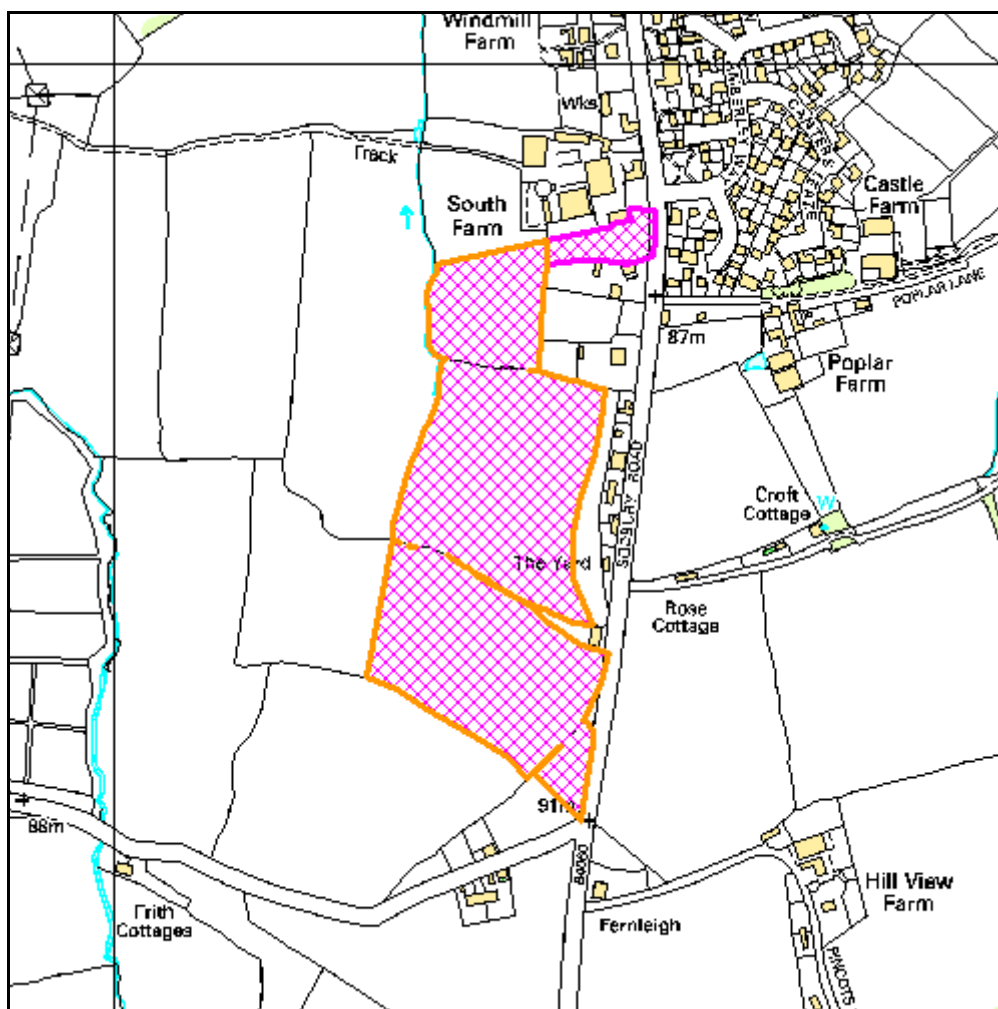


## STRATEGIC SITES DELIVERY COMMITTEE - 3rd August 2023

<b>App No.:</b>	P22/01300/O	<b>Applicant:</b>	Bloor Homes South West
<b>Site:</b>	Land At Sodbury Road Wickwar South Gloucestershire GL12 8PG	<b>Date Reg:</b>	22nd March 2022
<b>Proposal:</b>	Erection of up to 180 dwellings, a local shop and associated infrastructure (Outline) with access to be determined; all other matters reserved.	<b>Parish:</b>	Wickwar Parish Council
<b>Map Ref:</b>	372368 187581	<b>Ward:</b>	Chipping Sodbury And Cotswold Edge
<b>Application Category:</b>	Major	<b>Target Date:</b>	20th June 2022



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P22/01300/O

## **INTRODUCTION**

This applicant has lodged an appeal with the Planning Inspectorate against the Council's non-determination of this application. Jurisdiction for the application has now passed to the Planning Inspectorate. The Public Inquiry has been set for 31<sup>st</sup> October to sit for 8 days. This report is required to establish the Council's position, if the Council were in a position to determine the application.

Committee Members visited the site on 24<sup>th</sup> July 2023 and requested that:-

That a full and detailed report be presented to the Strategic Sites Delivery Committee to include:

- Landscape considerations
- Details of the Council's 5-year housing land supply including yearly delivery figures.
- Highway analysis to include a detailed sustainability assessment.
- Officer comment as to whether the sustainability assessment for Wickwar is considered to be up to date.
- Consideration of the safety of walking/cycling routes to local schools (including a map to show the routes).
- Details of bus service provision, including school transport and any contributions arising from the proposal towards the provision of primary and or secondary school transport.
- Consideration of highway safety at the access point on Sodbury Road, including plans to demonstrate the visibility splays are adequate to serve the proposed development.
- Clarification as to the number of trees to be removed from the site in order to accommodate the proposed development.
- Analysis with regard to school provision in the local area and whether there are sufficient places to accommodate the demand arising from the proposed development.
- Ecological considerations.
- Heritage considerations.

The majority of these issues are covered in this report, but where additional information is required, this will be reported as additional items to the Committee on 3<sup>rd</sup> August.

### **1. THE PROPOSAL**

- 1.1 This application seeks outline permission (with all matters reserved except for main vehicular access (es) from Sodbury Road) for up to 180 dwellings, a local shop and associated infrastructure at Sodbury Road, Wickwar, GL12 8PG. The site abuts the B4060 Sodbury Road to the east. The application proposes two access points in to the site to serve the development. One access point will be located to the north of Poplar Lane junction and south of the Amberley Way mini-roundabout. The other primary access point is proposed to be taken south of the Horwood Lane junction. Both of the proposed access points will be priority T-junctions.

- 1.2 The site measures 7.89 ha divided between 4 fields in agricultural use, which is grade 3 (i.e. good to moderate quality). The land has a varied topography ranging from 83m-90m AOD, although it is generally flat with a shallow depression running North-South in site. The boundaries are formed by a mix of hedgerows, some trees and areas without definition to a boundary. The southern boundary touches the junction at Frith Lane. A 'slither' of land is to be retained in agricultural use to the east of the site, between it and the houses which front Sodbury Road.
- 1.3 The site is in Flood Zone 1 but due to the site's topography and central running depression results in a potential surface water flooding risk (see comments on drainage later in report). The existing culvert headwall that lies within the site drains the existing run-off from the B4060 Sodbury Road.
- 1.4 There are no Public Rights of Way (PRoWs) that cross the site but several run nearby. The National Cycle Route 410 lies to the north of Wickwar and forms part of the Avon Cycleway, which connects to Bristol via the surrounding towns and villages.
- 1.5 There is a bus stop on Sodbury Road at the NE corner of the site with services 84 & 85 which until recently connected to Yate, Wootton -Under - Edge and Chipping Sodbury. However as of the end of June 2023 these services ceased to be run by Stagecoach and a less frequent service was picked up by The Big Lemon Bus Company. WECA has introduced Dynamic Demand Responsive Transport (DDRT) bus services.
- 1.6 The site and its surroundings fall within the north-eastern extent of NCA 118 'Bristol, Avon Valleys and Ridges' National Character Area, which encompasses the City of Bristol at its core and the surrounding area to the northeast, south and south west - including the Chew and Yeo valleys, Keynsham, Clevedon, Portishead and parts of the Cotswolds and Mendip Hills Areas of Outstanding Natural Beauty. The site is situated wholly within Landscape Character Area (LCA) 5 – 'Wickwar Ridge and Vale', described briefly as "a diverse undulating landscape covered with a mix of farmland, woodland and common."
- 1.7 The site does not contain any Heritage Assets and lies outside Wickwar Conservation Area (approx. 350m to the north). However, the site does lie in the setting of Grade 2 listed South Farmhouse (approx. 40m to the north) and Grade 2\* Listed Frith Farmhouse (approx. 440m to the southwest).
- 1.8 Nearby facilities within a 15-minute walk of the site are a Pub, a Coffee Shop; a Social Club; a Church; Alexander Hosea Primary School with Wickwar Playing Fields being a 10-minute walk. Yate, Chipping Sodbury, Cromhall and Charfield are all within a 10-minute drive.
- 1.9 The application is supported by a tree survey which identifies a total of 23 individual trees, 4 tree groups and 13 hedges. Of these, it was concluded there were; 1 Category A Tree; 9 Category B Trees & 2 Category B Tree Groups; 10 Category C Trees & 2 Category C tree groups and 2 Category U Trees.

- 1.10 An extended phase 1 habitat survey has been undertaken by EDP in support of the application. It concluded that the existing habitats of arable land and agriculturally improved grassland predominant within the site are considered to be of low ecological value. However, the existing native hedgerow network and mature trees are considered to be of good ecological value with potential to support protected and notable species.
- 1.11 A low voltage overhead transmission line crosses the site at the north, which will be undergrounded as part of the proposals. The length of undergrounding would be determined at reserved matters stage, but could be up to 100m. There is also a high-pressure gas pipeline in the south-west corner of the site and the HSE has outlined an Outer Zone and no development should take place in that part of the site.
- 1.12 The Design West Review Panel visited the site and were given a presentation of the originally submitted scheme on 29<sup>th</sup> June 2022. The key comments are as follow:-
1. Landscape – It was hoped that the scheme would meet the 10% BNG through on-site provision and to exceed if possible.
  2. Note POS all along western/open boundary. They appreciated that the surface water drainage flow had led to solution, but perhaps is too engineered. Placing most of the POS to the west means only a small proportion of homes have an aspect over significant POS. The POS appears peripheral to the scheme whereas a central element, offering greater potential for social interactions and improved aspect to homes within the body of the site (the houses along the west will retain an aspect over largely open countryside).
  3. Concerns over single large attenuation feature as this may not offer the best landscape and ecology benefit. Suggest they are dispersed through a range of design elements including rain gardens. The swales mentioned are part of this dispersal and could provide significant biodiversity and landscape value. Seeking to hold some water within the site would be helpful towards BNG.
  4. The construction of swales and attenuation elements will lead to significant amounts of cut and fill. As it is not to be removed from the site, the Landscape Architect needs to be involved from early on to incorporate it into design opportunities.
  5. Management of the landscape should be considered at an early stage.
  6. There may be benefit to the walking network and to the farm itself if additional non-motorised connection was made through the northern part of the site, linking with the existing PRoW to the northwest. This would utilize a field which is not part of the red line, but is understood to be in the same ownership and coupled with routes through the site and improved crossings over Sodbury Road, there is a real opportunity to enhance the PRoW network with health and wellbeing benefits.
  7. A movement strategy diagram would be helpful, which should include retained and altered networks of pedestrian and cycle routes.
  8. Furthermore, volumes and speeds of vehicles on Sodbury Road were observed to be a barrier to pedestrian movements across the road and the siting of the shop creates increased demand for this crossing. They

note the recent traffic calming on Sodbury Road and support the applicant's gateway feature located at the shop, with improved crossing facilities to address this issue.

9. Would be helpful to understand if improvements to the bus service are envisaged, particularly if a south-bound bus stop is proposed near the shop.
10. The 30mph design speed for the principal route was acknowledged as a mistake and it would also appear not compelling rationale for running a bus loop through the site. This will allow for compression of junctions etc. to create low speeds. The homes will be provided with 'fast' 7KW EV charging, but it is suggested that the shop offers 'rapid' 50kw charging.
11. The loss of 2 willow trees at the northern access is regrettable but compensation planting is proposed.
12. The 10.5m width of tarmac is unlikely to provide the characterful public realm that is desired. Discussions should be held to attain a better design solution.
13. The project team should consider ways in which the development might contribute to the changing character of Sodbury Road within the village. At the location near the shop signage, planting and street furniture etc. could all contribute to creating a lower speed environment as motorists enter the village.
14. Welcomed the reported use of managed access around the perimeter including public access across private drives to ensure ease of pedestrian movement around the development without requiring circuitous routes.
15. Parking at the allotments and shop should be considered at this stage.
16. It was noted that Charfield Station would open soon and any measures which might encourage cycle use to the station or Yate would be encouraged.
17. With regard to heritage, the panel considered that the proposal should not mimic the village centre but seek to ground the proposals in their context through using similar patterns of variety in building form, material and detail. This is a challenge, but design team should work to avoid perceptions of uniformity and banality which delivering repeated standard house types can produce.
18. Support the design team in their aim to create distinctive and appropriate public realm, ways and means of which have been mentioned in relation to the highways design at the village entrance. Is there a potential to create a greener heart to enhance social engagement. Reconsidering how play spaces for children and adults may contribute to this option for place making is something that might be usefully considered.
19. Noted illustrations indicate 2 nodes within the development, but they were not convinced that the use of hard landscaping and the sorts of houses enclosing the spaces would provide the sort of high quality distinctive public realm that is required. More distinctive public realm proposals tailored to the site are required, including utilizing the existing hedgerows and proposed swales as part of a rich and varied hierarchy of hard and soft public realm spaces.

20. The realignment of some streets would allow distant views to the church.
21. The undergrounding of the power lines to the north of the site is welcomed.
22. The panel noted that the road layout and building layouts appeared typical of the low density, suburban layout of the sort commonly seen across the region in the past 20 years. The form factor of this type of layout was significantly worse than that for terraced housing of at least 6 houses in length. If the houses were to offer the same operational energy performance there would need to be an increase in insulation thicknesses beyond what cavity insulation might easily accommodate. In short, the layout did not appear to offer the sort of inherently low carbon housing typology that the climate crisis will inherently require.
23. The orientation of the units does not appear to respond to solar orientation. It was confirmed by the applicant that the insulation and operational targets would be consistent with statutory requirements and there were no specific targets with respect to embodied carbon or whole life carbon.
24. The panel suggested that the project is of sufficient size so that part of it may be used to develop layouts and types which are more consistent with the move to zero carbon. Some use of appropriate terrace typologies would appear consistent with this.
25. The 10m strip to the east was noted as being retained by the landowner. This presented potential issues of the land potentially being just left offering little benefit. Suggest that the landowner is approached again about incorporating the land to a managed useful space.

## **2. POLICY CONTEXT**

### **2.1 National Guidance**

National Planning Policy Framework July 2021  
National Planning Practice Guidance  
National Design Guide

### **2.2 Development Plans**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that “where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise.

The development plan for South Gloucestershire comprises of the following documents:

- Local Plan: Core Strategy (2013)
- Local Plan: Policies, Sites and Places (PSP) Plan (2017)
- West of England Joint Waste Core Strategy (2011)

### **South Gloucestershire Local Plan Core Strategy Adopted December 2013**

CS1 High Quality Design

CS2 Green Infrastructure

CS4a Presumption in Favour of Sustainable Development

CS5 Location of Development  
CS8 Improving Accessibility  
CS9 Managing the Environment and Heritage  
CS16 Housing Density  
CS17 Housing Diversity  
CS18 Affordable Housing  
CS23 Green Infrastructure, Sport and Recreation Standards.  
CS34 Rural Areas.

**South Gloucestershire Local Plan: Policies, Sites and Places Plan  
Adopted November 2017**

PSP1 Local Distinctiveness  
PSP2 Landscape  
PSP3 Trees and Woodland  
PSP6 Onsite Renewable and Low Carbon Energy  
PSP8 Residential Amenity  
PSP10 Active Travel Routes  
PSP11 Transport Impact Management  
PSP16 Parking Standards  
PSP17 Heritage Assets and the Historic Environment  
PSP19 Wider Biodiversity  
PSP20 Flood Risk, Surface Water and Watercourse Management  
PSP21 Environmental Pollution and Impacts  
PSP37 Internal Space and Accessibility Standards for Affordable Dwellings  
PSP43 Private Amenity Space Standards

2.3 Supplementary Planning Guidance

The South Gloucestershire Design Checklist SPD (adopted)  
The South Gloucestershire Residential Parking Standards SPD  
(adopted)  
Waste Collection: Guidance for New Developers SPD (adopted)  
Extra Care and Affordable Housing SPD (adopted)  
Revised Landscape Character Assessment SPD (adopted)  
CIL Charging Schedule and CIL and S106 SPD (Adopted)

2.4 Emerging planning policy (New Local Plan)

The Local Plan is at an early (Regulation 18) stage in its preparation, and therefore carries little and limited weight (in line with NPPF para 48b).

**3. RELEVANT PLANNING HISTORY**

- 3.1 P21/030/SCR – Screening Opinion for the erection of up to 180 dwellings – EIA  
Not Required.

**4. CONSULTATION RESPONSES**

4.1 Wickwar Parish Council

*On original submission*

Object for the following reasons:

1. The proposed development is outside of the Wickwar development boundary contrary to South Glos Core Strategy and PSP policy. We do not accept the conjecture that the CS5 policy should be disregarded in favour of the National Planning Framework because Bloors claim of less than 5 years land supply is not evidenced in the planning documentation or elsewhere. In fact, South Glos Councils Five Year Housing Land Supply Calculation March 2022 update confirms a five-year supply of 5.99 years (including a 5% buffer). It will be for the new South Gloucestershire Local Plan to consider any appropriate site allocations in the village.
2. We do not agree that the site can be considered a sustainable location because key facilities are not accessible with the accepted definitions as acknowledged in Table 5.3 of the Transport Assessment Document and further confirmed on the Wickwar DAP. Residents have further raised concerns that the local primary school is already oversubscribed, and this is a situation that is likely to deteriorate further as more families move into the Linden development. Additionally, M5 J14 is already being monitored amid concerns that it is exceeding mandatory limits set by the European Directive 2008/50 and there are concerns around the capacity of the Downs Road junction within the village.
3. Wickwar is already the location of two large recent developments of 180 dwellings which represents a 35% increase. With the Linden development still to complete there has been insufficient time to integrate this change to the area and new residents have highlighted key issues with infrastructure and facilities that will need to be addressed before more development should be considered. The addition of a proposed shop to the development could in fact increase car journeys, due to its location at the very far end of the village.
4. We are aware that a decision on Bloor Homes application for up to 250 dwellings in Charfield has been deferred at the behest of National Highways. In its latest response to the Wickwar application (dated 8th April 2022) National Highways states that SGC should not grant planning permission for another 6 months in order to await the impact of current developments and for further modelling evidence to be gathered.
5. At the time of determination of the Linden development application PK17/4552/O, the Councils transport officers raised concerns regarding travel sustainability and the creation of car-dependent development, with a lack of walking routes and bus services to provide alternatives. This decision was made in November 2018 and the situation remains the same, if not worse, due to further development in surrounding towns and villages since.

*On revised submission*

No comment received.

#### 4.2 Yate Town Council

*On Original submission*

Objects and has Concerns that the plans will increase the traffic along this section of road, which will have a negative impact on an already overloaded road network between Wickwar and Yate.



#### *On revised submission*

Object on the grounds that this application is outside their parish but will cause a negative impact on their parish. The development will add more pressure to their travel infrastructure, which is already at breaking point as witnessed in January 2023 with multiple roadworks taking place in or around Yate causing travel disruptions and local amenities.

The loss of more countryside will greatly impact the environment.

Yate Town Council strongly supports the comments that have been made by residents in Wickwar seeking to stop further large-scale development.

#### 4.3 National Highways

##### *On original submission*

No objections following receipt of additional information and states: - National Highways is aware that significant queuing occurs at peak times at J14 of M5. Applicant engaged positively and provided additional information. The applicant provided information regarding traffic flow at M5 J14 in the “7909-TN01- J14 Vehicle Trips\_v1” dated 11 July 2022. The Addendum presented the Trip Rates in both AM and PM Peak hours, resulting in approximately 5 vehicles from the development using the northbound off slip of M5, J14 in the AM Peak. Noting the limited proportion of vehicle trips that are expected to route through M5, J14, it is considered that National Highways would be unable to sustain an objection to the proposal, based on the proposed traffic generation.

##### *On Amended plans*

National Highways comments summarized as: No objection in principle to planning application P22/01300/O subject to **planning conditions** being attached to any consent the Local Planning Authority is minded to grant to the effect that:

1. Prior to the commencement of the development hereby permitted a construction traffic management plan shall be submitted to and approved in writing by the local planning authority (in consultation with National Highways). The plan shall include as a minimum: construction vehicle movements; construction operation hours; construction delivery hours; expected number of construction vehicles per day; car parking for contractors' vehicles; arrangements for off-loading and storage of construction plant and materials. Works shall be carried out in accordance with the approved plan. Reason: in the interest of the safe and efficient operation of the M5

#### 4.4 Highways Officer -

##### *On Original Plans*

- Holding Objection Recommendations as to what should be supplied in transport assessment was given at time of SCR opinion.
- Application form does not specify dwelling bedroom numbers and also shows 243 residential units as opposed to 180 applied for – clarification

sought.

- We note the Transport Assessment dated 7th December 2021; the Residential Travel Plan dated 22nd February 2022 and the Design and Access Statement including its Access and Movement and Facilities and Services sections.
- The Design and Access Statement includes 9 named facilities within a 15 minute as the crow flies walking distance, appreciating that, as highlighted in para 5.23 of the PSP Local Plan, actual walking distances to these few facilities will be greater and the quality of route needs to be considered. The infrastructure proposals do not suggest additional or separate accesses for pedestrians and cyclists and do not appear to consider infrastructure beyond the site's boundary – i.e. there is no external mitigation proposed.
- The facilities mentioned omit the range of facilities shown in PSP11 which is assessed in table 5.3 of the TA and agreed that these facilities would require other modes from walking and cycling.
- The proposed pedestrian route to the primary school is not set out in the assessment and as there is limited potential for non-car travel, the proposed route(s) need to be described and assessed in terms of safe walking route to school criteria as well as its timing should parents or guardians intend continuing their journey to work for example.
- We note that the National Travel Survey from 2016 is included in the Transport Assessment where it suggests that nationally on average 51% of primary school pupils walk to school with 41% travelling by car and 5% by bus. We would recommend that in order to understand the likely walking levels from this development to the school, that the school's actual modal share is reviewed given it is a village school that doesn't just serve the village. A safe route needs to be identified including appropriate infrastructure along the route and for crossing the main road.
- There is very limited walking infrastructure in Wickwar - limited to its built form and no cycling network in terms of routes with cycling infrastructure to encourage that mode - the Avon Cycleway is mentioned in the Transport Assessment which runs east/ west through the north of Wickwar, however this leisure route in this area is on the highway rather than segregated from traffic, and could not be considered more than a leisure route for experienced cyclists rather than the wider range including less experienced and less confident cyclists that we and central government through its Active Travel England are seeking to encourage.
- The Transport Assessment has extracted elements of Policy PSP11 in terms of the [absolute] minimum bus service that could be considered acceptable for development in a rural location, and suggests the bus service to be appropriate. No assessment of available capacity has been made, nor how the service fits in with the predicted demand noting the proposed distribution northbound and southbound from the site.
- Noting paragraph 5.25 from Policy PSP 11 of the Local Plan, for such a substantial development the public transport provision is in officers' view, in need of significant improvement to have some chance of avoiding car dominated modal share for journeys to and from this development.

- "5.25 The larger the development proposal and, or the larger the reliance on public transport to access key facilities and services, the more frequent and extensive a bus service will be required, in order to avoid a reliance on private car journeys."
- Recommendations as to what should be supplied in transport assessment was given at time of SCR opinion.
- Application form does not specify dwelling bedroom numbers and also shows 243 residential units as opposed to 180 applied for – clarification sought.
- We note the Transport Assessment dated 7th December 2021; the Residential Travel Plan dated 22nd February 2022 and the Design and Access Statement including its Access and Movement and Facilities and Services sections.
- The Design and Access Statement includes 9 named facilities within a 15 minute as the crow flies walking distance, appreciating that, as highlighted in para 5.23 of the PSP Local Plan, actual walking distances to these few facilities will be greater and the quality of route needs to be considered. The infrastructure proposals do not suggest additional or separate accesses for pedestrians and cyclists and do not appear to consider infrastructure beyond the site's boundary – i.e. there is no external mitigation proposed.
- The facilities mentioned omit the range of facilities shown in PSP11 which is assessed in table 5.3 of the TA and agreed that these facilities would require other modes from walking and cycling.
- The proposed pedestrian route to the primary school is not set out in the assessment and as there is limited potential for non-car travel, the proposed route(s) need to be described and assessed in terms of safe walking route to school criteria as well as its timing should parents or guardians intend continuing their journey to work for example.
- We note that the National Travel Survey from 2016 is included in the Transport Assessment where it suggests that nationally on average 51% of primary school pupils walk to school with 41% travelling by car and 5% by bus. We would recommend that in order to understand the likely walking levels from this development to the school, that the school's actual modal share is reviewed given it is a village school that doesn't just serve the village. A safe route needs to be identified including appropriate infrastructure along the route and for crossing the main road.
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- The Transport Assessment has extracted elements of Policy PSP11 in terms of the [absolute] minimum bus service that could be considered acceptable for development in a rural location and suggests the bus service to be appropriate. No assessment of available capacity has been made, nor how the service fits in with the predicted demand noting the proposed distribution northbound and southbound from the site.
- Noting paragraph 5.25 from Policy PSP 11 of the Local Plan, for such a substantial development the public transport provision is in officers' view, in need of significant improvement to have some chance of avoiding car dominated modal share for journeys to and from this development.
- "5.25 The larger the development proposal and, or the larger the reliance on public transport to access key facilities and services, the more frequent and extensive a bus service will be required, in order to avoid a reliance on private car journeys."
- The development's location and distance from the majority of facilities is likely to mean car will be the travel mode of choice from this development without improvement to sustainable travel infrastructure and services. The in-frequent and subsidised bus services on the elongated clockwise and anti-clockwise circuits to serve local villages and hamlets does not offer a realistic choice for many journeys. For this scale of development much better public transport provision is needed to encourage a non-car dominated development.
- The train station at Yate is also referenced including its services. The TA suggests it is "approximately 7km walking distance to the south of the development", though in reality it is not walkable as there is no infrastructure to safely walk towards the boundary of Yate where there are footways. We would like this questionable reference to be clarified.
- A number of assessments have been provided for the site, using traffic survey information from the Horwood application carried out in 2016. This information is considered to be too old and requires new surveys. Any assessment requires the modelling files to be provided for review, together with any calculations (plans confirming geometries; where relevant signal settings; intergreen times etc.)
- The consented development in Wickwar is the only information considered by the applicant. A review of influencing developments is needed including the North Yate New Neighbourhood which continues on its build programme.
- The High Street shuttle working has been simplistically assessed with PICADY. This signalised shuttle working requires a validated base model that replicates the queuing found in morning and evening peaks for the development traffic to be considered further. The current form of assessment is considered inadequate and its results misleading.

- The motorway junction 14 of the M5 has not been assessed, and it is required to be. National Highways may require this in their response.

### *On revised plans*

#### **Requirement for further information**

##### **Public Transport:**

The developer / consultants were advised on 22<sup>nd</sup> July 2022 (comments above) that WECA would be seeking a bus service contribution from this development to enhance local bus services to enable them to provide a 30-minute frequency bus service. Given the significant scale of this development, a higher frequency is needed to attract bus use rather than the proposed reliance on the bare minimum provision for rural sites shown in PSP11. WECA's estimated contribution was £450K per annum over five years. No mention has been made of this requirement. Any developer discussions with WECA should be provided especially if they offer any changed agreement on this.

No public transport patronage assessment has been made on the existing bus services as also requested - i.e. to confirm there is suitable spare capacity for potential demand given the very limited local service frequency, and limited local facilities requiring the need to travel for key facilities. Lastly, as services are likely to be altered in April this year, confirmation is required that the services that the developer relies on (which is subsidised), will be maintained. There was mention of *Dynamic Demand Responsive Transport*, potentially covering this rural area, though the WECA webpage is no longer available – I understood that changes to bus service provision are happening from next month (April).

##### **Highway operational assessment:**

A very simplified LINSIG assessment has been summarised for the shuttle working in the High Street. This falls short of the assessment that was requested, which was for a validated model of the junction operation, which to transport planners would require including the influencing priority junction at the Downs (as well as the shuttle works), and would require observation and representation within the model (the validation element), of observed queue lengths – i.e. to model what currently happens and then predict the influence of the development from that. The provided information offers no value in the assessment. Modelling files need to be shared for review.

##### **Mitigation:**

It is welcomed that there is now a mitigation section for this substantial development, with a proposed zebra crossing at its southern access across the main road (B4060); a southbound bus stop at the zebra crossing (the details of the stop /shelter/ RTI are not provided); gateway and other potential traffic calming features to encourage the 30mph speed limit; as well as a small number of dropped kerbs / tactile crossings on the walking route to the school. Wayfaring signs are also proposed.

It is noted from the WCHAR that opportunities to widen sections of the footway are highlighted but have not been taken forward on the basis of footfall - no predictions of footfall are provided.

We also note the presumption that there is appropriate capacity at the local primary school– no information is provided to confirm this. The accessibility and likely car mode of travel to other primary schools is not provided or discussed, noting that irrespective of the school's capacity, parents and guardians are able to choose within limits (capacity and take up etc.) where they send their children.

Amendments are required to the Travel Plan.

*Comments (23<sup>rd</sup> June 2023)*  
summary

**Table of Facilities in Wickwar, measured from centre of the village**

Facility	Walking & Cycling Distance	Number within Catchment 2020	Number within Catchment 2018
Dedicated Community Centre	800m	3	3
Library		0	0
Post Office		0	1
Public House		1	1
GP Surgery		0	0
Pharmacy		0	0
Dentists		0	0
Comparison Retail Store <sup>1</sup>	1,200m	1	1
Designated Town Centre		0	0
Superstore		0	0
Convenience Store <sup>2</sup>		0	1
Employment – Town Centre	2,000m	0	0
Major Employers		0	0
Safeguarded Employment Areas		2	2
Primary School	2 miles	1	1
Secondary School	3 miles	0	0
<b>Sub Total</b>		<b>8</b>	<b>10</b>
Superfast Broadband	n/a	Yes	Yes
Train Station/ Service	2,000m	0	0

Notes: 1 - Comparison Retail Store is a shop selling goods and service other than food e.g. hairdresser or garage; 2 - Convenience Store is smaller shop selling everyday basic food and drink items e.g. bread, milk

Public transport was also assessed which showed the former 84/85 service connectivity to Yate and Wotton-Under-Edge as well as the 63A service. [All of](#) these subsidised services have been withdrawn.

## Summary

We have reservations, similar to those raised on the now consented developments to the west of the B4060, which are that Wickwar has limited facilities meaning that for the majority of needs, future residents will need to travel, and that travel from this development which is distanced from many

facilities is likely to lead to car dominated travel unless there is significant improvement to the bus services and walking and cycling infrastructure.

The Appellant is proposing mitigation measures for walking infrastructure to the school, and is proposing a zebra crossing of Sodbury Road and a new bus stop, as well as a new shop as part of the development. An appropriately frequent bus service is needed to help offer new residents the choice of sustainable travel to facilities and services not found locally.

We therefore require the confirmation of a funding a new bus service to make the development acceptable in transport planning terms. Without this commitment we believe the development will be car dominated and therefore be in conflict with Core Strategy Policy CS8 and Policy PSP11.

*Final comments – 28<sup>th</sup> June 2023*

If the contribution to the bus service is covered in the S106, then this can form part of discussions to justify the amount – based on £450k/annum as a starting point.

No objection on sustainability grounds.

#### 4.5 Lighting Engineer –

*On original submission*

No reference to any street lighting or external lighting.

I must stress that the planting, positioning and species selection of trees and other vegetation needs to be much more considerate of the task of designing lighting schemes than usually seen. It is important to make sure that lighting levels are retained through the life of the street and schemes take into account the species selection and expected growth during the normal life of a planting scheme. The more obstructions placed in the path of the light distribution e.g. trees placed in the vicinity of street lighting, the more lights required to meet the BS; clearly this is not conducive to low carbon or energy efficient objectives and will have a considerable impact on capital investment and future maintenance costs. Lighting design and tree positioning cannot be done in isolation.

*On amended plans*

No details on proposed lighting and original comments remain valid.

Adoptable road lighting (S38) shall be designed in line with SGC's Street Lighting Material Specification (we do offer adoptable road lighting design service for developments within SGC) and shall be approved in writing. Adjacent existing and proposed adopted and adoptable street lighting shall be taken into consideration and amended as necessary to be in with the proposed development. Alterations to the existing adopted highway (S278) shall also be looked into and designed accordingly. Private lighting shall be designed in line with the relevant ILP guidance, especially with respect to ULR. I must stress that the planting, positioning and species selection of trees and other vegetation needs to be much more considerate of the task of designing lighting

schemes than usually seen. It is important to make sure that lighting levels are retained through the life of the street and schemes take into account the species selection and expected growth during the normal life of a planting scheme. The more obstructions placed in the path of the light distribution e.g. trees placed in the vicinity of street lighting, the more lights required to meet the BS; clearly this is not conducive to low carbon or energy efficient objectives and will have a considerable impact on capital investment and future maintenance costs. Lighting design and tree positioning cannot be done in isolation.

4.6 Housing Enabling – Comments summarised as :-

Full comments available online.

Affordable Housing is sought in line with National Planning Policy Guidance: Planning Obligations and other requirements under Policy CS18 of the Council's adopted Core Strategy Development Plan Document.

This application generates the following Affordable Housing requirement to be provided on site at nil public subsidy and in line with the comments set out in the full response:

- 35% Affordable Housing (72% Social Rent and 28% Shared Ownership)

Recommendation: No Objection subject to the above requirements being secured in a S106 and planning condition.

4.7 Crime Prevention Officer – The D&A does not contain any information on Crime prevention. Paragraphs 92, 97 and 130 of the National Planning Policy Framework July 2021 require crime and disorder and fear of crime to be considered in the design stage of a development. Other paragraphs such as 8, 106, 108, 112, and 119 also require the creation of safe environments within the context of the appropriate section. Having viewed the revised information as submitted March 23 particularly the revised Masterplan and DAS I now find the design to be in order for an outline application and complies appropriately with the crime prevention through environmental design principles. The applicant is advised that at Reserved Matters the security design measures indicated in the DAS will be scrutinised.

4.8 Archaeology - I have reviewed the archaeological desk-based provided in support of this application, but I have **reservations about progressing to approval without further work** undertaken.

Whilst there is nothing wrong with the archaeological assessment, DBAs like this are inherently limited by available evidence and rarely can make firm assertions on the presence or absence of archaeology. They rely heavily on the absence of records in the HER (as in there is nothing logged on the site and therefore no archaeology) when it should be noted that no investigation has taken place on the application site to determine whether archaeology exists.



I note that LiDAR was assessed as part of the DBA, but I cannot see any images showing the results of this. The text implies that there was only limited coverage but I have DSM data covering the entirety of the site and upon processing with a simple hill shade model, does show features in the central field as well as possible further feature to the south. Some of these must relate to historic field boundaries as set out in the DBA, but there is a clear eastward linear in the central field that cannot be matched against historic mapping. Admittedly this was only a basic modelling but does highlight potential features on the site.

There are features in the surrounding landscape that are of note. I would agree that the putative Neolithic barrow is not the most convincing asset. Nevertheless, it can't be entirely discounted and if it were to be Bronze Age then there is the potential that other, similar, barrows could occur in the landscape including on the Project Site.

Also, whilst I recognise that only limited archaeology was found on the two developments east of Sodbury Road (i.e. directly across the road from the current application) it cannot always be said that the same would be true of the application site. Indeed, the application site directly abuts the known extent of the historic settlement of Wickwar, whereas the other two sites did not.

Furthermore, the two sites to the east of the current application were both subject to work prior to determination. This took the form of geophysical survey and then evaluation (the latter under condition). I do not see a reason why we should depart from that approach here.

For the scale of the site, the lack of previous disturbance, the proximity to other known archaeology of varying dates, the possible features identified on LiDAR and in accordance with para 199 of NPPF, I recommend that field evaluation in the form of geophysics be undertaken before the application is determined.

I am fairly confident about geophysical surveys in this location and should it demonstrate limited archaeological potential then other archaeological matters could probably be dealt with under condition.

Additional comments:-

Following the submission of a geophysical survey, the results have demonstrated that there is limited archaeological potential and certainly nothing to warrant any further objection or pre-determination work. However, there will still be a requirement for archaeological work under condition.

There is still a need to undertake trial trenching to eliminate the possibility that geophysics has missed smaller archaeological activity and plan any necessary mitigation. As a geophysical survey has been undertaken a sample strategy of 2.5% of the development area should be undertaken.

- 4.9 Public Art Officer - No Objection (original and revised submission). Policy CS23 – Community Infrastructure and Cultural Activity. Planning Condition for a Public Art programme that is relevant and specific to the development. Refer to SGC Art and Design in the Public Realm Advice Note.

- 4.10 Drainage Officer (original and revised submissions) – No in-principle objection. Proposes conditions and what would be expected in RM application.
- 4.11 Tree Officer – Objects (original and revised submissions). Not in accordance with policies CS1 and PSP1 because of the removal of 2 TPO willow Trees in H1 shown on the tree survey. Should seek an alternative access do the trees can be retained.
- 4.12 Conservation Officer –

*On Original submission*

Harm identified. Comments summarised (full comments are available online) as: In accordance with the Framework, I would consider that the proposals would result in less than substantial harm for all the above assets, however the impact on each asset within this category will vary. Subsequently, unless in the “weighing-up” exercise as required by paragraph 202 of the Framework robust material considerations are identified that are considered sufficient to outweigh the identified magnitude of harm, refusal is therefore recommended.

*On amended plans*

I note the amendments made to the DAS and the additional information on the contextual analysis the development of characters areas is welcomed, but I would defer to the Council’s Urban Design Officer on whether this address some of the previous concerns regarding the overall quality of the development proposals.

In regard to heritage matters, I cannot see any material difference in respect of layout, but we have received a Heritage Addendum as prepared again by EDP and dated February 2023. The purpose of this document appears to be a simple rebuttal of the case presented above in respect of the impact of the development proposals on the identified heritage assets but it also comments on the developed design mitigation measures as listed on page 4 of the Heritage Addendum (hereafter the HA) which are noted.

Of these measures, while the changes are not directly apparent, the allotments to the NE corner were proposed in that location originally but the land to the western area of open space has increased and the space between the two development parcels to the south has increased which would help improve the potential for a visual corridor to be achieved. Tree planting to the northern boundary is also noted.

Turning to the HA, again under the headings covering the relevant assets, I would make the following points in response to the revised proposals and the content of the HA.

***Impact of Revised Proposals on the Wickwar Conservation Area***

Some of the points raised by the HA in support of the application are difficult to

understand, as while the views of the application site from within the conservation area were never an issue that had been raised as a concern, the implication that the development would barely be visible in views from Sodbury Road is a highly questionable conclusion to come to, as to the south there would be clear views of the development and in views between the existing buildings to the west of Sodbury Road, the rural backdrop will be replaced with the built form of the new residential estate. Overall, the urbanisation of the application site will be one that will have a clear and significant impact on the existing landscape. I would add though the mitigation measures are noted in views from the PROW to the north, the impact of the tree planting will help soften views of the development edge.

Since my comments were produced (which were based on a desk-based assessment but with a knowledge of the area) I have visited the site on a number of occasions including a “site walk” with the previous case officer.

While I would maintain that the proposals will result in a dramatic change in landscape character, I would agree with the statement contained within paragraph 2.14 of the HA in that due separation distances involved between the application site and the Wickwar Conservation Area, it is difficult to consider how the development would impact on its historic character and appearance. Furthermore and equally critical, from visiting the site there is an appreciation of the visual impact of the developments on the eastern side that have now have clearly established a greater suburban context for the village. Therefore, while the development proposals would “enclose” the western side of part of Sodbury Road (a point which the HA disputes), the impact would not be one that could be considered to cause harm to the conservation area. To put another way, the successive developments to the south of Wickwar since in the 1990s have significantly changed how the approach to the historic village core is now experienced. From visiting the site also I do not see a case that we are in a “cumulative harm” situation. The key issue in understanding or assessing the harm is the separation distances involved, the character of Sodbury Road in the immediate context and the fact that, at least for now, there will remain a visual buffer between the southern edge of the conservation area and the application site.

Therefore, while in my view the impact of the scheme is not one that has been sufficiently recognised and assessed within both the HIA and now the HA, I would ultimately agree with the HA in that the development proposals would not cause harm to the character or appearance of the Wickwar Conservation Area due to the distances involved between the application site and the historic core of the village. To perhaps describe the potential impact of the development proposals in another way, we are in something of a “setting” of “setting” situation here and so in my view any objection on the grounds of loss of setting to the conservation area would be difficult to sustain.

#### ***Impact of Revised Proposals on the Grade II\* Listed Frith Farm***

For Frith Farm the response from the HA is that while there may be views from the building on its eastern elevations, the building was not designed to facilitate such views. The views therefore are entirely incidental. The HA notes also the intervening landscaping which would further screen views with the western

edge of the development is being left open with further tree planting. A photograph is shown looking in the direction of the application site from a PROW to the east of Frith Farm, but this just reiterates that views of the development will be limited to the upper floor windows of the building and I would confirm this following a walk of the PROW to the east and north-east of Frith Farm.

While the issue of designed views is noted and would of course add interest and significance if this were the case, I find it difficult to agree that notwithstanding the distances involved, topography or intervening planting, a development of this scheme could be “barely noticeable” as suggested within paragraph 2.29. Ultimately, I would again disagree with the HA conclusion that the development proposals would not cause harm to the significance of Frith Farmhouse. For clarity also the issue of views from the site towards Frith House are not an issue or concern.

I’m sure it would be agreed with the applicant that the significance of the farmhouse is primarily derived from its fabric and form, its rural setting can also be considered to make a contribution to its significance. As a building of clearly high status as reflected in the quality of its architectural and scale, its isolated setting can be considered to reflect the wealth and importance of the owner within the surrounding landscape. This is also arguably reflected in the position of the building topographically on something of a highpoint especially in views from the west.

The proposed development would encroach into its setting. While I would disagree that the impact would be “barely noticeable” and without any actual evidence to the contrary (i.e. wire frames from the views from the windows), from the visits to relevant areas I would maintain the previous view on this that the development proposals would result in a change in setting, or more specifically a change in how the setting is perceived from Frith Farmhouse. In light of all other material considerations, while the change in setting would potentially be very limited, it would still be harmful.

### ***Impact of Revised Proposals on the Grade II listed South Farm***

After reviewing the amended proposals, taking the further mitigation measures into account and having visited the site, I would agree with the HA that the development proposals would result in a less than substantial harm to the significance of the Grade II South Farm and would concur that the harm would also be limited as suggested, i.e. towards to the lower end of the spectrum.

## **1. Conclusion**

Further to the revised proposals which includes some further mitigation measures and having visited the site to help fully assess the visual impact of the development proposals, in respect of the impact on the three identified heritage assets, I would agree with the applicant that the development proposals would not cause any loss of significance to the Wickwar Conservation Area.

I would also agree with the identified magnitude of harm within the HA in respect of the development proposals causing less than substantial harm towards to the lower end of the spectrum to the significance of the Grade II listed South Farm.

Consequently, in respect of Frith Farm and South Farm, as the development proposals would therefore neither sustain nor enhance the significance of these designated heritage asset(s), they are considered contrary to local plan policies CS9 and PSP17 and sections 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

In accordance with the Framework and as noted above, I would consider that the proposals would result in less than substantial harm towards the lower end of the spectrum to the significance of both the Grade II\* listed Firth Farm and the Grade II listed South Farm.

The application is therefore to be considered within the context of paragraph 202 of the NPPF, which is matter for the decision maker. I would however advise that as harm has been identified, compliance with the requirements of paragraph 199 of the NPPF has not been achieved and so as established through case law and reflected in paragraph 202 of the NPPF, the finding of harm gives rise to what can be regarded as a statutory presumption against the granting of permission.

- 4.13 Historic England – No comment or advice.
- 4.14 Environmental Protection (Noise) – No objection **subject to conditions**. A comprehensive noise report has been submitted covering an appropriate noise assessment and criteria. Mitigation measures will be required to cover parts of the development to address road traffic noise and from nearby farming/dairy. A CEMP condition is required.
- 4.15 Environmental Protection (Contamination) – No objections subject to conditions. A desk Top Survey was supposedly taken previously but has not been submitted with the application – **this should be submitted**. The ground investigation did not identify any risks to human health or groundwater. Elevated Zinc was identified – no impact on vegetation was noted. Basic Radon protection is required.
- 4.16 The Phase 1 Preliminary Risk Assessment (Desk Study) at South Farm, Wickwar by Clarkebond dated 02/04/20 was submitted and from review, it has been noted that asbestos was identified as a contaminant of concern but does not appear to have been included within the analysis of the soil samples within the Phase 2 Ground Investigation report.
- 4.17 Therefore, care should be taken, particularly in the vicinity of the farm, the areas of potentially backfilled ponds and any made ground across site for potential asbestos.
- 4.18 Otherwise, we are satisfied that the site investigation and conclusions are suitable for this application site.

- 4.19 Health & Safety Executive (HSE) – Do not advise against planning permission but note that the development is within the consultation distance of a major hazard pipeline so developer may need to contact pipeline operator.
- 4.20 Self-Build Officer

*On original submission*

No objections **subject to conditions** - South Gloucestershire Council have kept a self-build register since the 1st of April 2016, as of the 17th of May 2022 the total number of entries on the register was 1155, against which 373 plots have been granted planning consent. PSP42 – Self Build and Custom Housebuilding. The Councils 1st Self-Build and Custom House Building SPD was adopted 30th April 2021.

The submitted Self-Build Delivery Statement is very brief and does not follow the structure of the Delivery Statement set out by the Council.

9 Service Plots are required. Appropriate locations (as per the Illustrative Framework Masterplan) are currently suggested as the following locations:

The two parcels of land in the top field section (northerly edge of the site, near the LAP)

- The two parcels on the westerly facing side (middle field, facing the proposed attenuation basin),
- The parcel on the westerly facing side (bottom field, facing the LEAP and proposed Swale).

Due to the site size and phasing the Council require that prior to site or phase commencement (as appropriate) a Design Code or brief will be approved for the self/custom-build element by way of condition to agree as a minimum the subdivision of plots, building line, scale, and boundary treatments. The Design Code should set out design parameters for self and custom housebuilding and should not be overly prescriptive allowing for design variation, creativity, and innovation.

No more than 30% of the market dwellings shall be occupied until all the self/custom-build plots are provided as serviced plots and are being marketed appropriately.

*On amended plans (summary – full comments available online)*

The submitted Self-Build Delivery Statement is incomplete and does not contain any of the required information. The submitted statement conveys a lack of consideration for the custom and self-build plot provision and does not follow the structure of the Delivery Statement set out by the Council in the Local Planning Application Requirements list:

- The type of model used to bring forward self-build plots.
- How the proposed model fulfils the Housing and Planning Act's (2016) definition of self-build and custom housebuilding.

- Phasing of the development (this is to ensure self-builders can claim self-build exemption for CIL) – to be added as a condition
- Where the plots will be located - a proposed layout plan with custom and self-build plots highlighted and grouped together.
- Servicing of the plots – who will be responsible for connecting to or extending the utilities, fences, or boundary treatments to be
- Installed, any shared maintenance areas of communal areas, access roads, and estimated timing of the servicing and provision of the plots.
- Will bond payments be required?
- Details of the Design Code and Plot Passports – included in s106.

The location of serviced self-build plots and phasing (including a phasing plan) need to be agreed during the determination of the outline planning application. The submission is missing these key pieces of information for us to assess if the proposal complies with policy PSP42.

#### Quantum

PSP42 (part 4): 5% of 180 dwellings equates to 9 serviced plots (that meet the definition of self-build and custom housebuilding plots within the Housing and Planning Act 2016) for sale to self and custom housebuilders.

The supporting Self-Build Delivery Statement para. 2.2 states there is a “strong preference for the delivery of Custom Build Homes as Shell Homes, as this has advantages for design and the efficient and safe delivery of homes at the site”. Policy PSP42 (part 4) “require[s] developers to supply at least 5% of the total dwellings on residential and mixed-use sites of over 100 dwellings, for sale to self and custom builders, on the following sequential basis:

Firstly.

As self and/or custom house building serviced plots (that meet the definition of self-build and custom housebuilding plots within the Housing and Planning Act 2016 as amended or any subsequent amendment).

Secondly.

Where it is demonstrated that it was not possible to deliver the self-build and/or custom housebuilding plots in accordance with A, above:

#### Shell homes

As stated above, no information has been submitted. There is no justification provided to suggest that the sequential basis has been properly considered or addressed.

## Delivery and phasing:

The applicant will be required to enter into a condition and / or S106 agreement that agrees the number of plots, general location /phase, and timing of delivery. A self-build phasing plan will be required showing the location of the self-build plots including any access works to be approved by the Council prior to commencement. The phasing plan should show each plot for self and custom housebuilding and any access works to be each phased separately via the self-build phasing plan. It is preferable that self and custom housebuilding plots are included in the earlier phases. See informative below for more information.

Plots for self and custom housebuilding to be serviced and in a remediated condition in line with agreed triggers within the S106 Agreement.

We recommend that plots are carefully selected to ensure they can be serviced in an agreed specified period in the construction programme and are attractive to prospective self and custom housebuilders. It will thus be expected that plots and any 'shell homes' will be offered ahead of the developer standard product. Appropriate locations (as per the Illustrative Framework Masterplan) are currently suggested as the following locations:

- The two parcels of land in the top field section (northerly edge of the site, near the LAP)
- The two parcels on the westerly facing side (middle field, facing the proposed attenuation basin),
- The parcel on the westerly facing side (bottom field, facing the LEAP and proposed Swale).

PSP42 (paragraph 8.58) – Delivery Statements. Applications which contain plots for self-build or custom housebuilding should be accompanied by a delivery statement which sets out the programme for delivering the self/custom build plots to a serviced and remediated condition including details of access, servicing, infrastructure, subdivision and boundary treatment and how the delivery of plots will meet the definition of self-build and custom housebuilding and the definition of serviced plots (The Housing and Planning Act 2016 (section 9, (1))). An example of what is required in a delivery statement can be found here.

## Design

PSP42 (part 9): It is expected that custom build dwellings should not exceed 108sqm (gross internal floor space). It is good practice for developers to provide a mix of serviced plot sizes to meet the range of demand and affordability, subject to site-specific negotiations and the nature of the proposed development. There is scope for a mix of plot sizes, if this relates to the demand identified on the Council's Self-build Register (data from the register can be provided by request to the Self-build Officer). This is to ensure that CSB plots secured through PSP42 cater to the variety of aspiring self-builders,



including first-time buyers, middle-income earners, downsizers, and other specialist groups. Supplying a mix of plot sizes also plays an important part in enabling the delivery of housing to specialist groups.

The initial occupier of any self or custom build dwelling shall have primary input into that dwelling's final design and layout.

**Design code:** This application seeks outline planning permission, and it is expected that custom-build plots will be brought forward by way of full planning application for individual plots. Due to the site size and phasing the Council require that prior to site or phase commencement (as appropriate) a Design Code or brief will be approved for the self/custom-build element by way of condition to agree as a minimum the subdivision of plots, building line, scale, and boundary treatments. The Design Code should set out design parameters for self and custom housebuilding and should not be overly prescriptive allowing for design variation, creativity, and innovation.

Plot passports are simple summaries of the design parameters for each plot capturing relevant information from the Design Code, planning permission and Delivery Statement. They act as a key reference point for prospective purchasers and form part of the marketing material available for each custom build plot to help private homebuilders to understand what they can build on a plot. Plot passports are required for approval before commencement of those phases which include plots for private homebuilding.

Further details on what should be included in the Design Code and Plot Passports can be found in our recently adopted SPD (from page 27) [here](#).

## Marketing

Self and custom housebuilding plots are to be marketed at open market value. Any plots which remain unsold following the first marketing period shall be made available as either self / custom housebuilding plots or as shell homes during the second marketing period.

A strategy for the marketing of the custom-build plots is required before commencement of any phase which includes custom-build plots and should set out how plots will be marketed to eligible purchasers, use of plot passports, the method for valuing plots, the proposed terms and conditions for the sale and the use of a reputable and experienced estate agent.

No more than 30% of the market dwellings shall be occupied until all the self/custom-build plots are provided as serviced plots and are being marketed appropriately.

## Principle access road and communal areas

The Council will also require the principal access road and communal areas serving self-build and custom build plots to be delivered to adoptable standards by an agreed trigger, during the build out of the site or phase as appropriate.

## Summary of comments and recommendation:

Self-build and custom housebuilding is sought in line with national Planning Policy Guidance: Planning Obligations and other requirements under Policy PSP42 of the Council's adopted Policies Sites and Places Plan (PSP).

The supporting Self-Build Delivery Statement para. 2.2 states there is a "strong preference for the delivery of Custom Build Homes as Shell Homes, as this has advantages for design and the efficient and safe delivery of homes at the site". However, no justification has been provided to suggest that the sequential basis has been properly considered or addressed. Without the required information (as per my comments dated 25.05.22), the Self-Build Officer cannot make any further assessment on the custom and self-build provision.

This application generates a self and custom housebuilding requirement of 9 serviced plots to be provided on site and in line with the principles / heads of terms as set out above.

- A delivery statement is required from the developer setting out self-build delivery under PSP42.
- A self-build phasing plan and a Design Code is required to be conditioned as part of the Outline application.
- A marketing strategy is required before commencement of any self-build phase.
- Plot passports are required as part of the marketing of each self-build plot
- Confirmation of principle access road for the self-build plots

## **Recommendation: Objection.**

Insufficient information has been submitted in relation to the delivery of custom and self-build plot provision on site. In order to fully assess if the proposal can comply with policy PSP42, the applicant is to provide the above requested information.

We welcome further information from the applicant

## Recommended conditions with reasons & informatives:

The self-build phasing plan must be referenced in the outline permission to ensure CIL is not inadvertently triggered across the whole self-build element of the scheme due to commencement elsewhere on the site.

A Design Code is required to be conditioned as part of the outline application to ensure standards of design.

#### 4.21 Landscape Officer –

##### *On original submission*

Objects - The planning application document and plan bundle does not include all the information required to support the application, as outlined above, and is required in order that the application can be fully assessed. From a landscape perspective, the proposed development is not acceptable in its current form given its encroachment into the countryside west of Wickwar, which is not in keeping with the established settlement form along the west side of the B4060. Furthermore, the proposed development lacks a well-articulated and appropriate green.

No framework LEMP has been provided to support the application as previously advised.

Screening Opinion advice has not been taken. LVA rather than LVIA submitted and no cumulative landscape and visual assessment of the scheme in conjunction with the 2 new housing developments.

A calculation as to the number of replacement trees is required as set out in P13 of the Trees and Development Sites: Guide for New Developments SPD. SGC tree strategy to increase tree cover to 15%.

Neither Framework Masterplan -03001Rev H of DAS fig. 25 provide a sufficiently detailed landscape design and mitigation strategy plan as previously advised as required.

The SUD and Swale will mean little meaningful planting can be accommodated. Lack of circular footpath.

No indication as to how existing and new habitat will be incorporated into the GI network – defer to Ecology Officer.

3 housing blocks encroach into C'side, but design of southern and western boundaries do not show a well-designed, articulated green edge/buffer between the housing and C'side.

Large trees are required to be seen above roof tops

**Comment on Soil toxicity from Zinc** – Need comment from applicant to provide evidence on levels present on the site, appropriate remediation measures, and any longer terms issues that cannot be appropriately mitigated.

##### *On amended plans*

1.1 This is an outline application for the erection of up to 180 dwellings, a local shop and associated infrastructure (Outline) with access to be determined; all other matters reserved.

1.2 Further comments are given in underlined text below in respect additional issues noted during joint site view with the Case officer on 7 June 2022, and in underline in respect of revised information submitted March 2023.

1.3 The site extends to some 8ha and comprises a series of 5No. agricultural fields off the west side of the B4060 Sodbury Road at the southern end of Wickwar, which wrap around the rear of Nos. 64 to 86, which front onto the road. The site directly fronts onto the B4060 to the south of South Farm, with a broader frontage to the south of No. 86. A number of field hedgerows

(predominantly Hawthorn) with scattered, mature trees sub-divide and bound the site fields (except SW field boundary), although the western boundary of the southern large field is not contained by a hedgerow. Group TPO 113 covers the Willows along the NE frontage of the site, which form a local landmark in views along the B4060. The site falls in level from just over 90m AOD within its SE corner by the Sodbury Road to just above 83m AOD at its NW corner. A ditch extends along the northernmost two thirds of the western site boundary.

- 1.4 Grade II\* listed Frith Farm lies some 0.5km SW of the site. Grade II listed South Farmhouse lies adjacent to the NE corner of the site. The southern edge of the Wickwar Conservation Area lies some 0.33km further north along Sodbury Road. Recent residential development (PK16/4006/O) lies opposite the central part of the site on the eastern side of Sodbury Road, with further housing under construction (PK17/4552/O) to the south of Horwood Lane opposite the SE site road frontage.
- 1.5 A number of public footpaths cross the fields to the west and south of the site, and conservation area to the north, as well as connecting with Sodbury Road on the eastern/opposite of the site. Wickwar Ridge lies to the west of the site and village and the Churchill Ridge to the east; both are Visually Important Hillside under SGC Policy CS2.
- 1.6 The proposed development will be accessed off Sodbury Road to the south of South Farm, and south of No. 86 with a connecting spine road running through the development. The houses will be laid out within 3No. large parcels comprising 'outward' facing perimeter blocks. The housing will be up to 2.5 storey in height. Open space will be located within the NE margin of the site between the spine road and listed farmhouse, and within the western margin of the site, with 2No. connecting greenways extending along the hedgerows within the central site area to subdivide the development footprint. The western ends of the 2No. greenway have been slightly widened on Revision M of the Framework Masterplan to better accommodate the siting of a LAP and LEAP. A series of 3No. attenuation basins is now proposed within the western POS zone with a swale extending eastwards between the southern and central development areas and rain garden within the central housing zone. Allotments will be located adjacent to the northern site entrance, and a potential shop to the north of the southern access point.
- 1.7 Screening request submitted in November 2021, under reference P21/030/SCR. Consultation feedback advised that an application be supported by the following information: • Proposed scheme should take into consideration guidance set out in the adopted South Gloucestershire SPDs: • Landscape and Visual Impact Assessment (LVIA) to GLVIA 3, including a cumulative assessment, and agreement of representative assessment viewpoints. • A current tree and vegetation survey, and tree protection plan, to BS5837:2012. • Proposed landscape design and mitigation strategy plan, supported by a list of proposed planting species, demonstrating how a robust, integrated, and multi-functional open space and green/blue infrastructure will be delivered as part of the development. • A framework

landscape and ecological management plan (LEMP) for the whole development site.

An LVA rather than a more comprehensive LVIA has been provided. Also, no cumulative landscape and visual assessment of the scheme in conjunction with the 2No. new housing developments to its east has been undertaken despite this being advised as part of the Screening Opinion feedback.

- EDP 2: Site Character and Context – Landscape Officer comment on analysis: - Points 1 and 5 - the plan clearly shows that development along the western side of Sodbury Road is generally more linear and limited form (as noted in LVIA para. 2.3), with the focus of C.20 and C.21 residential growth being along the eastern side of the B4060. Adjacent to the site, existing development is generally limited to one plot depth, which facilitates gap views of, and a sense of connectivity with, the countryside lying west of Wickwar; note one such view annotated on EDP Plan 3.

- Point 4 – the southern section of the western site boundary cuts across a large field and is not delineated by a field hedgerow.

- Point 6 – there is no mention that the SW part of the conservation area comprises open land crossed by several public footpaths, which afford views of the open countryside to the west and south (including towards the site).

- EDP 3: Findings of EDP's Visual Appraisal - representative assessment viewpoints have not been agreed with SGC, as requested in Screening Opinion feedback. Potential visual effects also need to be assessed from the following viewpoints:

- *There is a sequence of views between South Farm and VP7 on the footpath/linear receptor lying parallel to the northern site boundary, including viewpoints with more open/worse case views of the proposals than depicted by VP7 and at least one additional, intermediate viewpoint needs to be assessed.*

- *There are also views between VPs 7 and 8 on same route, and a further intermediate/worse case view needs to be also assessed from here.*

- *Footpath LWR/25 within the CA, further west of VP 9, to complete the visual analysis provided by VPs 9 and 10. On the footpath extending between VPs 8 and 9, which follows the southern boundary of the CA, there are views back to the Grade II\* listed church in the CA and also clear views across the site to the buildings being constructed on the opposite side of Sodbury Road. There are clear view lines/vistas towards No. 1 Frith Lane/VP 4, the views from which is discussed below. There is no clear view of the site from the Royal Observer Corp Volunteers pill box.*

- *Firth Lane between VPs 2 and 4, where a field gate affords a clear view towards the site and surrounding part of Wickwar. From VP 4 the proposed POS margin will appear foreshortened in the view. The tower of the Grade II\* listed church of The Holy Trinity, within the conservation area, is clearly seen on the skyline to the left (north) of the listed South Farm. Current, proposed layout would not preserve this view line/vista. There is also a clear view of the church tower from opposite No. 1 on Frith Lane, and there may be other noticeable views of the church in the vicinity of VPs 2 and 3 in winter when adjacent skyline trees have lost their leaves.*

*- There are open/panoramic views from the section of Sodbury Road across the southern part of the site (in the vicinity of VP2) of the wider landscape setting of Wickwar and countryside surrounding it; these will be wholly lost in terms of the current development proposals.*

*- B4060 between VPs 2 and 3, where there is a more open view than that from VP 3; the proposed housing within the SE corner of the site/frontage will be visible and will effectively 'combine' with the new housing on the opposite, east side of Sodbury Road to create an 'enclosed, built corridor' approach into the village.*

*- Consider that there will be some key views of the proposals from the footpath route crossing higher land near VP 5/paddocks, in which the new housing will be quite noticeable/prominent rather just glimpsed as annotated on the plan; this needs further review in the LVA. - The proposals will be seen in views from the listed Frith Farmhouse.*

*- Consider that the Zone of primary visibility needs to be extended to take account of the above site observations (e.g. pass VP 7 and also to take in VP5).*

*- Wireframes/photomontages/AVRs should be provided to illustrate the change in view from key viewpoints, at Year 1 and with the proposed mitigation in place between years 5 to 15 for example.*

- EDP 4: Landscape Opportunities and Constraints – identifies the opportunity to frame a view northward across the site towards Holy Trinity Church, lying at northern extent of Wickwar, which is also highlighted in LVA para 6.1 (bullet point 7). A potential vista towards the church is now shown along the northern section of the primary internal road on Landscape Strategy Plan EDP 6190-d026 Rev. A, together with a second view from the northern part of the western POS zone (see further comment below).

- LVA para 3.7- Group TPO 113 covers the Willows within the NE site margin.

- Para. 4.22 assesses the overall landscape sensitivity of the site as being 'medium'.

- Para. 8.3 acknowledges there will be a fundamental change to the character of the site, and Paras. 8.8 and 8.9 acknowledge that the effect on the surrounding part of LCA 5: Wickwar Ridges and Vale cannot be fully determined at outline planning stage, although overall this is expected to be of 'low magnitude'. Landscape Officer considers that the impact on LCA will be of higher magnitude in the vicinity of Wickwar area of LCA 5.

- Defer to further comment from the Conservation Officer in terms of the impact of the proposals on the setting of the listed South Farmhouse and the Wickwar Conservation Area. Note from a heritage perspective, that no key views towards or from the Conservation Areas have been identified as being affected by the proposals.

- Defer to further comment from Urban Design Officer on the appropriateness, siting, scale and appearance/character of the proposals.

### 3.2 Comments on LVA Addendum (February 2023):

- Section 2.1 states 3No. additional assessment viewpoints were requested, when in fact the above advice discussed some 6No. additional locations; Table 4.1 identifies new VPs 13-15 are respectively located at the field gate along Frith Lane (between VPs 3 and 4), field gate along B4060 (between VPs 2 and 3), and PROW LWR/25 NW of the site (between VPs 8 and 9), as

shown on the plan extract above. • Some of the original site photographs have been updated.

• The cumulative impact of the proposed scheme in conjunction with the 2No. recent development sites along the eastern side of the B4060 is assessed as requested. Note that the application is double the size of these two sites in terms of units, which in combination accommodate up to 170No. dwellings.

• Section 2.1 does not list all the concerns raised in the landscape consultation feedback.

• Disagree with the conclusion in Para. 7.2 that the proposed revisions to the proposals address/take into account the concerns of the Landscape Officer.

• Not able to find GI Plan -3601 Rev. E.

### 3.3 Existing Vegetation:

• Arboricultural Impact Assessment (Sept 21) identifies some 23No. individual trees, 4No. tree groups and 13No. hedges within the site including a Category A Oak at the SW corner of site, and 9No. individual and 2No. groups of Category B trees that largely lie within the northern site area.

• Tree Impact and Retention Plan in Appendix 3 of the AIA shows that the southern part of TPO group GI (i.e., 2No. Category B Willows) will be lost to accommodate the new northern spine road entrance, and that a section of Hedge 10 and Trees T18 and T19 will need to be removed to accommodate the southern entrance access. The AIA does not show that some hedgerows will need to be removed to accommodate the internal housing and road layout as indicated on DAS Figure 25, p.63, or prescribe any tree protection fencing/measures, and will need to be updated to support any RM application. Defer to further comment from the Tree Officer.

• A calculation of the required number of replacement trees will be required with reference to Page 13 of the Trees and Development Sites: Guidance for New Development SPD.

• SGC tree strategy (2011-22) has the target of increasing tree cover across South Gloucestershire to 15% (Ref. national DEFRA target of 15% as minimum needed to adapt to a projected changing climate).

### 3.4 Landscape Design and Mitigation Strategy:

• Neither Framework Masterplan -3001 Rev. H or DAS Figure 25: GI Parameter Plan (previous Figure 25 no longer included) do not provide a sufficiently detailed landscape design and mitigation strategy plan, as previously advised would be required to support the application. Landscape Strategy Plan EDP 6190-d026 Rev. A is annotated with more detailed notes, which is helpful, but is not supported by a schedule of typical tree and plant species as previously requested. The wildlife pond and orchard within the NW POS area are welcomed. The 2No. potential view corridors towards the listed church appear to conflict with both proposed built footprint and tree planting locations on the plan, rather than being of comfortably framed and by such feature routes. New tree planting opportunities within the western POS zone are still limited by the footprint of proposed SuDS basins, and along the southern boundary of the site by the proximity of the proposed built footprint.

• DAS Figure 27: Drainage Plan and Figure 26 cross-section show that the proposed SuDS basin footprint will occupy most of the central area of the western POS zone thereby limiting its recreational usage and space for new

structural mitigation planting (previous Figures 26 and 27 no longer included). Similarly, the proposed swale footprint will allow for little meaningful tree/structural planting between the central and southern housing blocks. Framework Masterplan -3001 Rev. M shows that although the original large SuDS basin has been divided into 3 No. basins, the character and recreational usage of western POS area will still be dominated by these features. The widening of the western sections of the 2 No. greenways is welcomed but does not overcome the fact that most of the POS provision is located along the northern and western peripheries of the site. Note that the Design West Panel also were concerned about this issue.

- Framework Masterplan -3001 Rev. M indicates a more extensive network of footpath links between the 3 No. development parcels and western POS, together with the opportunity to provide an off-site link to connect with the PROW network lying to the NW of the site. Landscape Strategy Plan EDP 6190-d026 Rev. A shows these links as being mown grass, which is not acceptable in terms of facilitating around year recreational usage. Defer to further comment from the POS Officer in terms of the distribution of POS categories and uses.

- The footprint of the 3 No. blocks of proposed housing will encroach into the surrounding countryside. Additional tree planting strips are shown along sections of the northern and eastern boundaries DAS Figure 25: GI parameter Plan, but the design of the western or southern site boundary treatments do not demonstrate delivery of a well-designed, articulated green edge/buffer between the proposed housing and wider countryside, and therefore, will not provide the 'softened transition to the adjacent countryside' cited at LVA paras 6.1 and 7.4, for example. With reference to both the Framework Masterplan and Landscape Strategy Plan, the central and southern parcels still present a 'hard and uniform' western and southern development edge, with little articulation with the POS zone except for its the junction of the dividing E-W greenway. The 'green edge' zones on Figure 29 of the DAS, described on p. 78, and illustrated on Figure 30 appear to be mostly built form with some frontage onto shared streets and drives (Ref. Figure 24), and little opportunity for any meaningful structural planting or transitional built/green edge treatment. In contrast, the proposed layout accommodates orchard tree planting adjacent to the western edge of the northern parcel, which is welcomed.

- Framework Masterplan -3001 Rev. M indicates some additional tree planting along the spine road including a rain garden within the central development parcel. The space currently allowed for street trees along the primary access road appears constrained by the proximity of building elevations and drainage routes. However, an appropriate quantum of tall, broad growing trees (12m plus height), with space to mature to full height and spread, would be required across the whole site so that these are seen above and between the new roof tops, provide appropriate screening in views, and form new structural/focal landscape features..

### 3.5 Framework LEMP:

- No framework LEMP has been provided to support the application, as previously advised. No information provided.



3.6 The above analysis has been undertaken as a desktop study, and with reference to published guidance and internet imagery such as Google Earth and Street View. 4.0

#### Conclusion/Recommendation

4.1 The planning application document and plan bundle does not include all the information required to support the application, as advised at the pre-application and earlier consultation stages.

4.2 From a landscape perspective, the proposed development is not acceptable in its current form given its encroachment into the countryside west of Wickwar, which is not in keeping with the established settlement form along the west side of the B4060. The village has principally expanded southwards from the Conservation Area along the east side of Sodbury Road thus preserving a single plot/shallow depth of development along the western side of the B4060 (see DAS p.18 and 19 diagrams). Rather than adjoin the built edge of existing development along the western side of the B4060 the northern site parcel will be off-set from this to effectively form an 'outlier' of housing. Development of the whole site will result in a noticeable south westerly projection to the built village footprint, which will have a significant adverse impact on the rural character of its westerly landscape setting.

4.3 Furthermore, the proposed development lacks a well-articulated and appropriate green transitional edge, together with other appropriate mitigation measures as described above in Section 3. The revised proposals still show the central and southern development parcels presenting a very 'hard and uniform' western and southern edge, which will adversely impact views from the public footpath and lane network lying to the NW, W and S of the site.

4.4 Although the recent, eastern development along the B4060 intrudes into the character of this rural approach into Wickwar, this is currently balanced by the open, undeveloped land within the site. The proposed development will result in the loss of existing open views across the southern part of the site to the countryside surrounding Wickwar, which forms its landscape setting (see VP 2 on the B4060, for example); and also, will impact on views both towards and from listed buildings.

4.5 *In conclusion, there is a landscape objection to the proposed development.*

4.6 If the application is given planning permission, the following will be required to be submitted by as a RM or condition application, as appropriate:

- Tree/hedgerow protection plan, including supporting construction method statements - agreed as part of enabling works/prior to start of main construction works, and calculation of replacement number of trees required.
- Detailed Green Infrastructure and Landscape Design and Mitigation Strategy Plan
- Phasing of all open space and landscape infrastructure works
- Detailed planting plans specifying the location, species, stock size, planting

centres and quantities of all proposed tree and structure planting (to be implemented in the first season following completion of construction works); including planting to open space and public realm areas, street frontages, site boundaries, and on-plot where this contributes to the wider landscape infrastructure. Locally indigenous native species should be included within naturalistic open spaces, with street tree species within more urban spaces, and supporting implementation specification.

- A landscape and ecological management plan covering the enabling works operations/period and a subsequent 20 Year management period, identifying existing and proposed landscape and ecology related site assets, associated management objectives, schedules of annual maintenance work together with longer term management operations.
- Details of all proposed boundary and hard landscape surface treatments, including proposed levels and any soil retention/retaining walls that may be required, together with supporting schedule of proposed manufacturer hard landscape materials and site furniture products.
- Detailed design for SUDs basins and features to demonstrate how these will be sympathetically integrated into open spaces/green corridors.
- Detailed designs for proposed play areas

4.22 Education Officer – On initial submission - No objections **subject to contributions** as set out below – (correct for 3 months from 12<sup>th</sup> May 2022).

	No of Dwellings	Nursery Children Yield	Primary Pupil Yield	Secondary Pupil Yield
	180	19	65	33

No of Dwellings	Nursery Contribution	Primary Contribution	Secondary Contribution Transport	Total Contribution
	£	£	£	£
180	200,583	1,032,915	287,000	1,520,498

4.23 *On revised submissions* –

4.24 1.1 Early Years: The provision for Early Years within the Chipping Sodbury & Cotswold Edge Ward is provided by 5 settings and 3 Childminders. This development is calculated to yield an additional 19 children that would increase pressure on places in the ward.

4.25 1.2 Primary: In South Gloucestershire there is 1 primary school within a 2 mile radius (straight line distance) of the development site. While there is some capacity within this area this will be absorbed by the impact of anticipated pupil yields from development sites, where planning applications have been approved or are in process.

- 4.26 1.3 Secondary: The nearest secondary school is Brimsham Green (3.8 miles) and the school falls in the area of Prime Responsibility of Chipping Sodbury School (4.1 miles). The projected numbers for the nearest school indicate insufficient places to absorb any additional yield from new housing developments based on projected numbers on roll by 2026. Additionally, and reflecting that both schools are over three miles away, the Local Authority would require a contribution towards costs for transport to school.
- 4.27 The most cost effective mode of transport to either Brimsham Green or Chipping Sodbury School would be by coach, currently costing £46,519 per year for 33 pupils in both cases. A student will be in secondary education for 7 years. The total cost of transport to school for 33 secondary pupils is therefore  $£46,519 \times 7 = £325,634$
- 4.28 2. Calculated Pupil Yields from the development.
- 4.29 Specifically, the proposed development options are estimated to generate the following pupil yields:

	No of Dwellings	Nursery Children Yield	Primary Pupil Yield	Secondary Pupil Yield
	180	19	65	33

- 4.30 Pupil Yields are based on the mix of dwellings identified by the developer. In the absence of this the yield for primary is 36 pupils per 100 dwellings, secondary is 18 pupils per 100 dwellings. Early Years children are calculated based on 40% take up of part time 2 year olds, 100% eligibility of part time 3 and 4 year olds and 80% eligibility of additional part time 3 and 4 year olds, this is equivalent to Primary yield divided by 7 multiplied by 2. Please note that actual contributions will be recalculated on the actual mix of dwellings.
- 4.31 3. Education infrastructure requirements arising from Land at Sodbury Road Contributions are required to fund the Nursery and Primary places identified from the pupil yield -see details below and accompanying table.
- 4.32 3.1 Early Years: The contribution would be required to cover the pupil yield from this development increasing demand for places in the area.
- 4.33 3.2 Primary: The contribution would be required towards the building of a new Primary school or for additional accommodation at an existing Primary school to allow them to breach current planned admission numbers, both options would be within a 2 mile radius of the proposed development site.
- 4.34 3.3 Secondary: The contribution would be required for additional accommodation at an existing Secondary school within 3 miles of the development site to allow them to breach current planned admission numbers, additionally transport to either Brimsham Green or Chipping Sodbury School will be required.

#### 4.35 3.4 Contribution Summary

No of Dwellings	Nursery Contribution	Primary Contribution	Secondary Contribution	Secondary Contribution Transport	Total Contribution
	£	£	£	£	£
180	210,368	1,083,295	833,550	325,634	2,452,848

4.36 The cost per place is calculated using the Department for Education cost calculator of £11,072 per additional nursery place, £16,666 per additional primary pupil place and £25,259 per additional secondary pupil place. Both are indexed as at the Quarter 4 2021 value of the Royal Institute of Chartered Surveyors Building Cost All-in Tender Price Index.

4.37 This advice is valid for a period of three months from the date that it is issued by the Department for Children Adults and Health. Should the mix of dwelling change, or should the development not proceed in the near future, the contribution would need to be reassessed. Estimates at this stage should not be viewed as minimum or maximum requirements and should not be taken as the final position of the Council. The final amount of contribution should be increased in accordance with any increases in the Royal Institute of Chartered Surveyors Building Cost All-In Tender Price Index.

#### 4.38 Community Infrastructure Officer –

##### *On original submission*

Summary of Community Infrastructure Section S106 requests – (Full details online)

(Please note the figures shown below are the current rates, which are uplifted annually)

**Contributions towards library enhancement £49,979.59**

**Contribution towards additional library stock £3,564.00**

**Contributions towards dedicated community centre provision £296,234.67**

NB All figures are subject to indexation using the Updating Percentages published by the Building Cost Information Service (BCIS).

The applicant should demonstrate that there will be sufficient and good access to existing community facilities in Wickwar including DCC space. If there is not, then the applicant should engage with the operators of those facilities and local community to understand what additional provision would be needed by this development and identify options for expanding or improving existing facilities. In response to the South Gloucestershire Dedicated Community Centre survey 2020 Wickwar village hall identified a need to upgrade facilities, to improve energy efficiency.

##### *On amended plans*

No Change in requirements.

#### 4.39 Ecology –

*On original submission*

***Designated sites for Nature Conservation (European Sites, SSSI's and local sites (Sites of Nature Conservation Interest or Regionally Important Geological Sites) :***

Bishop's Hill Woods SSSI (670m east from the Application Site) and Lower Woods SSSI (1.2km east of the Application Site) identified within the potential zone of influence of the Application Site. The appraisal considers no direct impacts to the designated sites or qualifying features. Indirect effects identified include recreation pressure and habitat degradation. Open green spaces included as part of development proposals to include semi-natural habitats such as allotments and play areas. I recommend that the design and management proposals are outlined within a Landscape and Ecology Management Plan.

I agree with the Landscape Architect's recommendations dated 21 June 2022 for the requirement of a Landscape and Ecology Management Plan covering the enabling works operations/period and a subsequent 20 Year management period, identifying existing and proposed landscape and ecology related site assets, associated management objectives, schedules of annual maintenance work together with longer term management operations.

I agree with the concerns of Natural England in their Correspondence dated 03 August 2022 for Lower Woods SSSI & Bishop's Hill Wood SSSI with regards to recreational pressure on these sites and the potential for settlement growth in close proximity to Lower Woods SSSI and Bishop's Hill Wood SSSI to result in an adverse effect on the reasons for designation for these sites.

I agree with the concerns of the Gloucestershire Wildlife Trust's Public Comment dated 12 August 2022 regarding recreational pressure on the two sites. The Trust disagrees that the inclusion of limited green space along the western boundary of the Application Site will serve to reduce footfall at nearby designated sites is sufficient. The Trust's view is that *'the proposals have not taken sufficient steps to avoid and mitigate the adverse impacts of substantial additional recreation pressure it is highly likely to impose on Lower Woods SSSI and nature reserve. As a result, it will be detrimental to a nationally designated biodiversity site and cause undue financial burden to a local charity'*.

Ladden Brook SNCI is within the potential zone of influence of the application site and no direct impacts anticipated. Indirect impacts may arise during construction and operation e.g. contamination run off, pollution incidents leading to deterioration of water quality and increase in suspended solids. I would expect pollution prevention measures to be outlined within a Construction Environmental Management Plan.

***Habitats (including habitats of principal importance (Priority Habitats) Section 41 Natural Environment and Rural Communities (NERC) Act 2006: Hedgerows***

Hedgerow H6 was considered to qualify as an important hedgerow. Native hedgerows are considered at local value and loss of circa 28m with associated culverting of ditches and to incorporate access roads and footpath links.

Creation of 670m new species-rich hedgerows, tree and shrub planting to enhance retained hedgerows along the Application Site boundaries. Root protection buffers included within the design and protective fencing to be erected as recommended within BS5837:2012 to protect retained habitats on site. I would expect the provision for hedgerow creation and management to be outlined within a Landscape and Ecology Management Plan.

#### **Arable field margins**

Arable field margins are Section 41 habitats of principal importance. The Ecological Appraisal does not acknowledge that field margins are Section 41 habitats and locations are not mapped/target noted as part of the Phase 1 survey.

#### **Invasive species (INNS)**

INNS is not acknowledged/included within the report therefore recommend a pre-construction walkover survey of the Application Site, and if required, an INNS management plan to be prepared by a suitably qualified/specialist INNS consultant.

***Species protected under the Conservation Regulations 2017 ('European Protected Species') as well as the Wildlife & Countryside Act 1981 (as amended):***

#### **Bats**

***Roosting*** - A suite of surveys was undertaken, and the Ecological Appraisal considered bats to be of local importance. Three trees identified as moderate potential and two as low potential. T3 (moderate) and T1 (low) are potentially lost. The aerial inspection did not identify evidence of bats and concluded that no impacts to tree roosting bats anticipated, however the Ecological Appraisal does not recommend emergence / re-entry surveys for the moderate tree (T3) potentially lost to facilitate construction. Further clarification is required for the absence of emergence/re-entry surveys.

***Foraging and commuting bats*** - The Ecological Appraisal states that '*Anabat SD2 (hereafter referred to as 'Anabats') were deployed in two locations throughout the Application Site*'. The bat report plan (refer to drawing title '*Plan EDP 4a: Automated Bat Detector Locations and Transect Route*') shows the location of two bat detectors outside of the red line boundary. There no automated bat detectors deployed within the Application Site boundary to further consider/understand bats how bats utilise the Application Site. Reference to the Bat Conservation Trust's Bat Surveys: for Professional Ecologists: Good Practice Guidelines was made in the report, however I wish to seek further clarification on why both detectors were deployed outside of the Application Site without any within the Application Site.

I agree with the recommendations outlined in the Ecological Appraisal for the installation of Schwegler bat boxes on retained suitable semi-mature trees for biodiversity enhancements.

As highlighted by the Lightning Engineer on 12 April 2022, no lighting designs have been submitted on the planning portal. Any lighting designs should adhere to the Bat Conservation Trust and the Institution of Lighting Professional Guidance Note.

The Ecology Appraisal acknowledges the requirement of a lighting strategy sensitive to bats, which should be secured through condition.

#### **Great crested newt (GCN)**

The Ecology Appraisal notes 'a pond circa. 10m' is present north of the application site. The pond P1 within the drawing '*Plan EDP 8: Great Crested*

*Newt Survey Results* show this pond to be >10m. Clarification is required to confirm where this 'pond circa. 10m' is located. A low population is concluded therefore I would expect avoidance and mitigation measures for GCN outlined within an amphibian mitigation strategy and appropriate Natural England licence application.

#### **Dormouse**

The surveys were undertaken within guidelines, however nest tubes are known to under detect in low density areas. It is disappointing that footprint tunnels were not used as supplementary technique. Guidance for these methods have been made available by People's Trust for Endangered Species (PTES) and the Chartered Institute of Ecology and Environmental Management (CIEEM) since 2018. Clarification is needed to confirm that the 23.11.21 survey date is 23.11.20 in Table EDO A7.1 of the Ecological Appraisal. Hedgerow creation proposed will provide foraging and dispersal habitats for dormice.

The surveys did not identify any evidence of dormice and are not considered further.

#### **Otter**

A single otter spraint was found along Ladden Brook SNCI. The Ecological Appraisal concluded the wet ditch network may facilitate the dispersal of otter across the wider landscape whilst associated hedgerows provide some cover to this species. Avoidance and mitigation measures for otter to be included within a Precautionary Working Method Plan/Construction Environmental Management Plan.

#### ***Species protected under the Wildlife and Countryside Act 1981 (as amended):***

##### **Nesting birds**

The Ecological Appraisal considered breeding birds to be of local importance. I would expect timing of vegetation clearance works to be undertaken outside of nesting bird season. If this is not possible, nesting bird checks and vegetation clearance to be undertaken by and under supervision of a suitably qualified ecologist.

##### **Reptiles**

The Ecological Appraisal scoped out reptile surveys due to limited extent of suitable habitat for common reptiles. The Ecological Appraisal acknowledges that it is unlikely that the Application Site supports a significant reptile population, and low numbers could be present in field margins. Avoidance and mitigation measures for reptiles to be included within a Precautionary Working Method Plan/Construction Environmental Management Plan.

##### **Water vole**

The surveys did not identify any evidence of water vole and are not considered further in this report.

##### **Fish**

There is a ditch network present within the Application Site. The Ecological Appraisal noted poor water quality and absence of a notable fish population of value. Fish are not considered further in this report. I would expect pollution prevention measures to the ditch network to be outlined within a Construction Environmental Management Plan.

##### ***Badger Act 1992***

There is no evidence of setts within Application Site. Three subsidiary and a single outlier sett were recorded outside the Application Site within wider survey area. Due to the presence of suitable habitats for badgers within the Application

Site, avoidance and mitigation measures for badger to be included within a Precautionary Working Method Plan/Construction Environmental Management Plan. A pre-construction survey should form a planning condition.

***Species of principal importance (Priority Species) Section 41 Natural Environment and Rural Communities (NERC) Act and Local Biodiversity Action Plan Species:***

**Hedgehog**

It is disappointing that hedgehogs are not acknowledged as a Local BAP or Section 41 species or discussed results from desk study records searches and there is suitable habitat within the Application Site for hedgehogs. In addition, hedgehogs are listed as Vulnerable on the Red List for England's Mammals. Avoidance and mitigation measures for hedgehogs to be included within a Precautionary Working Method Plan/Construction Environmental Management Plan.

**Invertebrates**

Invertebrate surveys were scoped out as the Application Site is dominated by agricultural land likely to support a limited assemblage of common and widespread species. Invertebrates are not considered further in this report.

**Amphibians**

General measures for the welfare of common amphibians to be included within a Precautionary Working Method Plan/Construction Environmental Management Plan.

***Birds listed on the Red, Amber or Green Lists of Species of Conservation Concern (PSP19)***

Six red list species and seven amber list species were noted in the Ecology Appraisal, of which five are priority species. BoCC5 was published on 01 December 2021. I recommend that this list is revised to check if bird status have changed since BoCC4.

The breeding bird assemblage within the Application Site has been assessed as local importance. Avoidance and mitigation measures for breeding birds to be included within a Precautionary Working Method Plan/Construction Environmental Management Plan.

***Wildlife corridors or new green infrastructure, which enable the dispersal and favourable status of flora and fauna species (PSP19) and the protection and enhancement of biodiversity through safeguarding ecological networks (NPPF para 174)***

Considerations for minimising loss of hedgerows and compensation for unavoidable losses to be outlined within a Landscape and Ecology Management Plan.

***Brownfield sites supporting notable assemblages of invertebrates (PSP19)***

Not applicable as brownfield sites are not present on site.

***Biodiversity enhancements and biodiversity gain (NPPF para 174 (b) and 175 (d) and PSP19)***

It is positive that calculations indicate that the development proposes to deliver >20% habitat units and >34% hedgerow units through creation and enhancement on-site with Trading Rules satisfied.

The wet and dry ditch habitat (D1, D2, D3, D7 and D8) not accounted for in the metric. Whilst this is included in association as a hedgerow feature, the ditch habitat should be included within the River calculation tab and any section that will be a culvert.



#### A-1 Site Habitat Baseline:

Incomplete cells '*Area Retained*', '*Area enhanced*' and '*Bespoke compensation agreed for unacceptable losses*'. The '*Assessor comments*' column is not readable and the '*Reviewer comments*' column is not complete;

It is not clear how the condition score was generated for modified grassland for baseline. Assessor comments should include this justification;

Strategic significance for crops '*Area/compensation not in local strategy/no local strategy*'. Arable is a habitat included in the Local BAP. Consider Strategic Significance '*Within area formally identified in local strategy*';

#### A-2 Site Habitat Creation:

Incomplete cells '*Habitat created in advance/years*' and '*Delay in starting habitat creation/years*'. The '*Assessor comments*' column is not readable and the '*Reviewer comments*' column is not complete;

It is not clear how the condition score was generated for each of the habitats (where applicable);

It is not clear how the local area for play and local equipped area for play and open space are accounted for;

Habitat types such as mixed scrub and other neutral grassland are ecologically valuable. Consider Strategic Significance '*Location ecologically desirable but not in local strategy*'.

#### A-3 Site Habitat Enhancement:

It is not clear how the condition score '*Moderate*' was generated for other neutral grassland;

Neutral grassland is ecologically valuable. Consider Strategic Significance '*Location ecologically desirable but not in local strategy*'.

Incomplete cells '*Habitat created in advance/years*' and '*Delay in starting habitat creation/years*'. The '*Assessor comments*' column is not readable and the '*Reviewer comments*' column is not complete;

#### B-1 Site Hedge Baseline

Incomplete cells for '*Length retained*' and '*Length enhanced*'. The '*Assessor comments*' column is not readable and the '*Reviewer comments*' column is not complete;

Hedgerows were assessed as '*Area/compensation not in local strategy/no local strategy*' however are included within the Local BAP. Recommend that these are amended to '*Within area formally identified in local strategy*';

#### B-2 Site Hedge Creation

'New hedge number' not complete;

It is not clear how the condition score '*Good*' was generated

Hedgerows were assessed as '*Area/compensation not in local strategy/no local strategy*' however are included within the Local BAP. Recommend that these are amended to '*Within area formally identified in local strategy*';

Incomplete cells '*Habitat created in advance/years*' and '*Delay in starting habitat creation/years*'. The '*Assessor comments*' column and the '*Reviewer comments*' column are not complete;

#### B-2 Site Hedge Creation

It is not clear how the condition score '*Good*' was generated

Hedgerows were assessed as '*Area/compensation not in local strategy/no local strategy*' however are included within the Local BAP. Recommend that these are amended to '*Within area formally identified in local strategy*';

Incomplete cells '*Habitat created in advance/years*' and '*Delay in starting habitat creation/years*'. The '*Assessor comments*' column and the '*Reviewer*

comments' column are not complete;

Paragraph on page 3 incomplete: *'The remainder of green space planting has been split between wildflower grassland and. The target condition for wildflower grasses and scrub is appropriately higher as future management plans will seek to maintain these for their benefit to wildlife;'*

'BIA' is included in 3.4 of the Biodiversity Net Gain Calculations report. The definition of BIA is required.

**National Planning Policy Framework (NPPF) and Local Plan Policy (South Gloucestershire Local Plan: Policies, Sites and Places Plan (PSP) (adopted November 2017)) Context**

NPPF Para 170 – 177 (Conserving and Enhancing the Natural Environment), National Planning Policy Framework

PSP18 – (Statutory Wildlife Sites: European Sites and Sites of Special Scientific Interest (SSSIs)) - South Gloucestershire Local Plan (PSP Plan)

PSP19 (Wider Biodiversity) - South Gloucestershire Local Plan (PSP Plan)

CS9 (Managing the Environment and Heritage) - Core Strategy

CS2 (Green Infrastructure) - Core Strategy

PSP3 (Trees and Woodland) - South Gloucestershire Local Plan (PSP Plan)

**Conclusion and Recommendations**

I would recommend that the stakeholder concerns are addressed especially Natural England and Gloucestershire Wildlife Trust comments regarding recreational pressure on Bishop's Hill Woods SSSI and Lower Woods SSSI prior to planning determination.

A lighting design to be submitted to support the planning application and implementation of a sensitive lighting strategy for bats to be part of a planning condition.

A low population of GCN is concluded therefore I would expect avoidance and mitigation measures for GCN outlined within an amphibian mitigation strategy and secured through condition with appropriate Natural England licence application.

I recommend that a detailed Landscape Masterplan and a Landscape and Ecological Management Plan is secured through a condition to demonstrate the delivery of biodiversity net gain for the habitats proposed with the proposed target conditions. In addition, the Landscape and Ecological Management Plan to demonstrate how maintenance and management for a 30-year period can be achieved. I recommend that the biodiversity net gain is recalculated, and the metric completed following detailed Landscape Masterplan, to include UK Habitat Classification and provide detailed condition scoring justification. The delivery of the proposed >20% biodiversity net gain to be a condition of planning.

It is recommended that all proposed construction stage avoidance and ecological mitigation is set out within a Precautionary Working Method Plan/Construction Environmental Management Plan and secured through a condition.

All concerns within my comments to be addressed prior to determination.

*On amended plans*

I have reviewed the Addendum to Ecological Appraisal and Biodiversity Net Gain Calculations, both prepared by EDP in February 2023. I have also reviewed the revised Masterplan and Landscape Strategy. I am satisfied that these documents have sufficiently addressed the ecology comments of 8th

February 2023 made by Arup on behalf of the Council. The revised scheme demonstrates additional ecological enhancements, as reflected in the new Biodiversity Net Gain (BNG) calculations. I note that additional measures are proposed to further reduce potential impacts from recreational pressures on Lower Woods SSSI.

Requirements prior to determination:

None.

Requirements prior to commencement / conditions to be attached to planning consent:

1. The mitigation measures that apply to the site clearance and construction phase of the development should be included in a Construction Environmental Management Plan (CEMP), with detailed Method Statements. It should include all the measures detailed in the Ecological Appraisal and Addendum to the Ecological Appraisal, including those proposed for GCN in accordance with the EPS Mitigation Licence or the District Licence. The CEMP should be submitted and approved by the LPA.

2. The mitigation and enhancement measures outlined in the Ecological Appraisal and Addendum to the Ecological Appraisal should be expanded on in the form of a Landscape and Ecology Management Plan (LEMP), including longer-term 2 management and monitoring activities. Management should be applicable for a minimum period of five years, although in relation to BNG this is to be for 30 years and include a monitoring regime to ensure habitats establish well and that wildlife features remain in good condition. It should include all the measures proposed for GCN in accordance with the EPS Mitigation Licence or the District Licence. It should also include plans showing locations and extent of all habitats and wildlife features, and a timetable of activities. A Responsible Person / organisation needs to be stated and the method by which the protection of retained and created habitats and open spaces will be secured. The LEMP should demonstrate that the BNG proposed in the BNG assessment has been achieved. It should be submitted and approved by the LPA.

3. Prior to commencement, details of external lighting should be submitted to and approved in writing by the LPA. The details should clearly demonstrate that lighting will not cause excessive light pollution or disturb or prevent bat species using key foraging / commuting corridors and habitat features or accessing roost sites. The details should include, but not be limited to, the following: i. A drawing showing sensitive areas and/or dark corridor safeguarding areas ii. Description, design or specification of external lighting to be installed including shields, cowls or blinds where appropriate. iii. A description of the luminosity of lights and their light colour including a lux contour map iv. A drawing(s) showing the location and where appropriate the elevation of the light fixings v. Methods to control lighting control (e.g. timer operation, passive infrared sensor (PIR)). All external lighting should be installed in accordance with the specifications and locations set out in the approved details. These should be maintained thereafter in accordance with these details. Under no circumstances should any other external lighting be installed unless agreed with the LPA.

4. The LPA would require receipt of the GCN EPS Mitigation Licence or the District Licence certificate prior to commencement.

National Planning Policy Framework (NPPF) and Local Plan Policy (South Gloucestershire Local Plan: Policies, Sites and Places Plan (PSP) (adopted November 2017)) context:

- NPPF Para 170 - 182 (Conserving and Enhancing the Natural Environment, Habitats and Biodiversity), National Planning Policy Framework1
- PSP18 - (Statutory Wildlife Sites: European Sites and Sites of Special Scientific Interest (SSSIs)) - South Gloucestershire Local Plan (PSP Plan)
- PSP21 (Wider Biodiversity) - South Gloucestershire Local Plan (PSP Plan)
- CS9 (Managing the Environment and Heritage) - Core Strategy • CS2 (Green Infrastructure) - Core Strategy
- PSP3 (Trees and Woodland) - South Gloucestershire Local Plan (PSP Plan)

The Environment Act 2021 contains provisions for the protection and improvement of the environment, including introducing Biodiversity Net Gain (BNG).

Wildlife legislation context:

- Wildlife and Countryside Act 1981 (as amended)
- Conservation of Habitats and Species Regulations 2017
- Natural Environment and Rural Communities (NERC) Act 2006
- Protection of Badgers Act 1992.

I note that additional measures are proposed to further reduce potential impacts from recreational pressures on Lower Woods SSSI, so these **should be included in the CEMP and LEMP**.

- 4.40 Gloucestershire Wildlife Trust – Objects on the basis of increased recreational pressure it will add to Lower Woods SSSI and nature reserve. The addition of 180 homes and a substantial number of new residents, just over a km and within walking distance of Lower Woods, will certainly increase the impact on this designated site which is already under pressure. This is in addition to new residential development within the locality. From our experience, it is almost inevitable that the site will become a main local recreational space for new residents, particularly for dog walking and mountain biking. We acknowledge that the increase in recreational pressure has been recognised in the ecological appraisal. However, we disagree that the inclusion of limited green space along the western boundary of the site will serve to reduce footfall at nearby designated sites. It is in the view of the Trust that the applicant has not provided sufficient information to demonstrate that this impact can be avoided or mitigated and we therefore do not consider the application to be compliant with the National Planning Policy Framework, specifically paragraph 180(b). We are also aware that some residents of Wickwar drive to Lower Woods to use it as a recreation space. During school holidays at the weekends, there is already insufficient parking capacity to deal with the existing number of visitors to Lower Woods. This results in haphazard and sometimes dangerous parking, which can negatively impact the biodiversity of the site. The potential addition of a large number of regular users visiting by car will cause additional wear and tear to the entrance track, imposing a substantial additional financial burden on Gloucestershire Wildlife Trust. In conclusion, the proposal has not taken sufficient steps to avoid and mitigate the adverse impacts of substantial additional recreation pressure it is highly likely to impose on Lower Woods SSSI and nature reserve. As a result, it will be detrimental to a nationally designated

biodiversity site and cause undue financial burden to a local charity.

- 4.41 *On amended plans* - The developers environmental consultants EDP have clearly looked at the ecological concerns expressed by GWT, Natural England and others, and, within the confines of the application site have tried to address them. What they have suggested in terms POS and its management is appreciated, and a move in the right direction.

Notwithstanding this, no matter how attractive the application site is made to residents, there will still be a desire to seek out more visually and ecologically interesting landscapes in the immediate locality. EDP make much of the immediate connections the site provides to the wider PROW network, and whilst we accept this is available, the land to the west of application site is generally flat, open, arable and ecologically and visually uninteresting. This is in stark contrast to the land to the immediate west of Wickwar (including Lower woods) which is undulating, intimate, wooded and ecologically very diverse. This will inevitably draw people to the site with the resulting degradation of the habitat.

As a Trust we understand that people have a desire and a right to visit and experience wild spaces, indeed our strategy is all about re-connecting people with wildlife, however, that has to be managed in a manner that does not destroy the very asset people want to visit.

- 4.42 There are mitigating works and processes that could be bought to play 'off site' that could do much to allow the development to go ahead without compromising the integrity and ecological value of lower woods. Mitigation works both soft (education) and hard (infrastructure improvements) do of course do come at cost and it does seem reasonable that the development rather than GWT - the owner of Lower Woods bears the substantial burden of this. We maintain our objection therefore unless the developer commits to fund agreed mitigating measures to manage the burden on Lower Woods of their development through a Unilateral undertaking or by whatever means can be agreed.
- 4.43 If minded to consent then this should be conditioned such that the ecological management plan is implemented in full, and if the above cannot be achieved that the developers at least enter into negotiations with GWT on how best to manage increased visitor pressure on Lower Woods.
- 4.44 Natural England – Objects. Comments summarised as: - Lower woods SSSI is exceptionally important in ecology terms. The SSSI is the most extensive ancient woodland in Avon and comprises a mosaic of different habitat types which give rise to an extraordinarily rich and diverse ecological community. This includes 12 species of bats recorded on the site notably a Bechstein's maternity roost and a likely Barbastelle maternity roost. Bishops Hill Wood SSSI is designated for species-rich, ancient broadleaved woodland together with associated and steeply sloping, neutral-grassland habitats on damp and heavy soils.

Concerns over increased recreational pressure as both are within short walking distance.

The Lower Woods SSSI management plan adopted in 2016 noted that increased visitor numbers were already having impacts on the site through paths becoming wider and muddier and the near total loss of trackside vegetation in some places. In addition to this, problems associated with more frequent use of the site by dog walkers such as defecation and disturbance are also noted. Natural England understand that recreational pressure at Lower Woods SSSI has increased during Covid. It is our understanding through conversations with Gloucestershire Wildlife Trust that increased visitor numbers are putting an increasing financial pressure on site management.

*On amended plans* – No objection subject to the measures in the Ecological Addendum being secured. The quantum of greenspace put forward in the application is reasonable in comparison with national standards such as Fields in Trust. The overall amount of greenspace provision is therefore considered acceptable.

The additional links to the Public Right of Way Network to the north are welcomed. In addition to the physical connection of the site to the PROW network, we would welcome if a welcome pack could be supplied to new residents highlighting the PROW network and accessible greenspace away from Lower Woods SSSI and Bishop's Hill Wood SSSI. This welcome pack should also highlight the sensitivity of the SSSIs to recreational disturbance and appropriate actions residents can take if visiting the SSSIs to limit disturbance.

There are known issues with recreational pressure at Lower Woods SSSI as highlighted in Gloucester Wildlife Trust's comments on the application. As the managers of the site GWT will have a good understanding of the current pressures on the site and its management, there may be specific onsite measures at the SSSI which the applicant may be willing to support due to the issues with recreational pressure at the SSSI

#### 4.45 Climate Officer –

##### *On original submission*

Fabric Efficiency figures worse than values indicative of very low carbon design and in the case of the ground floor and external walls only a marginal improvement on Building Regulations requirements. The proposed value for insulation at rafters is worse than the value set in the BR. I strongly encourage the applicant to review the specification and improve the fabric U-values as the simplest and most cost effective means of permanently reducing energy demand and energy running costs in this scheme.

Gas fired boilers – X. I strongly encourage the applicant to revise their heating and hot water strategy and specify renewable heating for this scheme.

Need to maximise PV on dwellings according to unshaded roof area of suitable orientation to minimise demand for grid electricity and energy running costs. Provision of internal space for battery storage is encouraged.

From the information presented in section 10 of the Energy Statement the reduction in residual emissions appears to have accounted for regulated emissions only and excluded unregulated emissions. As set out in the guidance above and Energy Table 1, the reduction in residual emissions is based on

regulated and unregulated emissions. As proposed the scheme does not comply with PSP6. Please amend the calculations and resubmit.  
Request assurance that the buildings will not overheat.  
EV charging provision (minimum power output of 7kW) should be include in the Energy Statement.

*On amended plans*

It doesn't appear that an updated Sustainable Energy Statement has been provided and thus previous comments stand.

4.46 Urban Design Officer -

*On Original submission*

Objection summarised as:

- Lack of food shopping – lack of detailed or convincing info in relation to proposed store. The development will be car dependent. The proposed shop location as far south away from established population. Particularly pertinent as SG have declared a Climate Emergency. Lack of suitable pedestrian connections to Wickwar. ..Whilst the actual proximity of the centre is relatively close, the quality of the route is very poor – narrow pavements very close to fast moving/heavy traffic; need to cross at various points as pavements stops, but no crossing points; Outside settlement boundary; No other development permitted on western side of B4060.. leads to clear development divide – the developments on the eastern side of the road combine to form an elongated and ribbon-like form of development which reaches past the 'comfortable' development limits.
- D&A - No mention of National Design Guide; no mention of PSP11 'Transport Impact Management'. Final para on p11 trails off with no end.
- Lack of info as to how the number of units can be accommodated – no indicative layout which allows more strategic road layout to be tested and ensure deliverable blocks.
- Lack of thorough context and character appraisal – focus on High Street, but lacks the back lanes which are equally locally distinctive; photos would help context. As an overall approach, it is better to primarily reference the best and most significant local character elements, then take account of modern features. This will provide a stronger baseline to create more locally distinctive design.
- Building heights is too general – some 2.5 storey OK but generally needs to be 2 storey. The approach should be linked to the street hierarchy info in subsequent pages.
- P58 sets out criteria for primary corridor – does not tie in with what Wickwar is. Roof tiles are not grey in Wickwar.
- Ensure attenuation basin on west does not remove all POS.
- Boundary treatments are critical – use of stone walling is one of the most obvious references – boundaries, street design and building form all need to be considered together – for e.g. stone walls could have

hedging behind.

- Solar panels in dark roofs only.
- Parking needs to be linked to the movement and built form hierarchy. Also indicate different approaches to parking as this will help reduce the visual impact within the street scene. Electric car charging needs to be considered at this stage.
- Bin storage considerations...terrace houses to have bin storage to the front in quality enclosures.
- Design Review Panel?

#### *On amended plans*

One of the main issues from previous comments focussed on the provision of a shop. Just based on the information set out in the DAS, there is no viability or supporting evidence. Is there a way to secure the shop under this Outline permission? Certainly, need to secure an area within which a future shop could realistically be provided. Page 82 of the DAS provides some information relating to the shop but nothing definitive or persuasive.

In terms of referring to the DAS under Condition, I would only recommend doing that if the DAS sets out appropriate design principles and materials. Detailed comments on the DAS have been provided given that the applicant has requested that it be included in a permission under a Condition. As the DAS stands, I would recommend that it is not included, or that various changes are made first.

Page 19 DAS – Buthay Lane extends behind the High Street, not just focussed on the southern end.

Page 20 – built form – longer terraced rows of houses but each house has a clear vertical separation, having been built at different times, including varying window forms and positions. Displays the classic organic character. Highlight the way in which the separate terraced rows have exposed and visible end gables which define the street and spaces between rows. The pitched roof forms are also noticeable where taller roofs sit adjacent to lower roofs.

Page 24 – Under the ‘roofs’ heading, need to highlight that one of the main characteristics is that gables are highly visible, either where facing directly onto the lane or when viewed between gaps in the built form. This is a clear difference between the High Street and Lanes character. The existing text for Back Lane needs to be amended. Highlight stone combined with brick quoins and window surrounds as a strong reference.

Page 26 – For Amberley Way, under the Urban Form heading, need to mention long stretches of inactive sides of buildings or rear gardens defining the public realm. The use of materials and overall character does not respond to the historic character of Wickwar (the High Street or back lanes).

Page 27 – Under the ‘roofs’ heading, need to note that most of the properties either have some form of gable feature facing the front, or the end gable can be



clearly seen from areas of public realm.

Page 29 – useful photo page with associated colour palette.

Key to this site is finding ways to create different character areas, not just basically the same style, heights and approach to parking across the whole area. There have to be clear differences, principally between the primary route through the site and development which defines the open countryside.

The Building Heights Parameter Plan on page 59 is broadly acceptable. The previous text does refer to 2.5 storey buildings being located in nodal spaces and along the primary street, but this may need to also be noted on the actual plan itself.

Need to introduce more apartments – not to necessarily increase density, but to respond to the huge affordability crisis in the housing market. Need to introduce choice in a wider range of housing types and sizes, not predominantly 3 and 4 bed houses.

Page 61 – shows a new Zebra crossing and bus stop, both of which are positive.

The Street hierarchy diagram on page 63 is logical. However, consideration should be given to segregated cycle lanes.

NDG Para 82 – ‘Priority is given to pedestrian and cycle movements, subject to location and the potential to create connections. Prioritising pedestrians and cyclists mean creating routes that are safe, direct, convenient and accessible for people of all abilities. These are designed as part of attractive spaces with good sightlines, and well-chosen junctions and crossings, so that people want to use them.’

NDG (Page 25) – good practice example of a dedicated pedestrian and cycle route separated from vehicles.

Numerous other guidance points towards, either the separation of cycle movement away from vehicle movement and that where this doesn’t occur, people are far less likely to choose to cycle, particularly families with younger children.

Page 66 – Shared streets – need to add in the following points which need to be considered when designing shared spaces within South Gloucestershire. This whole section will need to be amended as it does not incorporate many of the critical issues and features which are essential in any shared space setting.

Design of the shared space should be an integral and parallel process to design of the residential layout with the objective of creating a very low traffic speed (<10mph design speed), interesting and safe public realm incorporating space for an occasional substantial street tree or cluster of trees.

Generally, serve less than 100 dwellings. Use of shared space should be considered carefully as a tertiary part of a hierarchy of streets. Manual for Streets advises that they are most likely to work well in short lengths or where they form cul-de-sacs, where the volume of traffic is below 100 vehicles per hour.

Some variation in width based on a predominantly 6.5m wide carriageway (3.5m Fire appliance/refuse truck + 1m safety margin + 2m excavation/service margin). 6m wide where serve less than 10 dwellings (to allow for reversing).

Shared space streets must have a clear entrance threshold such as Copenhagen style crossings and demarcated by a change in materials.

Traffic calming must be a maximum of every 30m (typically a build out with tree and change in material. Raised table tops may also be used and often at junctions).

Surfacing should be distinct from other highway typologies. Suggest a minimum of 50% block paving to tarmac (use of hot rolled asphalt with a colour chip can further help define these streets). Carefully specify block and colour chip to reinforce character areas and distinguish streets.

Integrate parallel visitor parking (2.5m wide) and subtly demarcate in a different material.

Use Conservation kerbs: 125mm upstand to prevent unauthorised parking and vehicle overrun, 25mm elsewhere.

Carefully consider the build line set back (at least 1.5m) and front boundaries/gates to create safe thresholds that prevent direct stepping onto the shared space.

Avoid thin strips of kerb and hardstanding (block or tarmac) alongside the shared space that could be interpreted as footways. Planting strips to sides of house walls should be a minimum of 600mm wide to allow adequate space for soil between footings & kerb haunching to accommodate planting (shrubs and hedge etc. is preferred to grass to reduce maintenance and vehicle overrunning where these are conveyed to households).

Key points here are that shared spaces must feel and function as different types of spaces to create lower vehicle speeds and a safer environment, and a range of critical measures are needed to achieve that aim.

Page 65 – Is there any way to also incorporate trees within the ‘Primary streets with rain gardens’ cross-sections? All streets must be tree-lined but it would be sensible to suggest that fewer street trees could be provided if rain gardens were also provided.

Page 67 – shared drives – again, this page needs to incorporate the main features of shared spaces but given these shared drives are in all cases located adjacent to either countryside or GI/green open spaces, they should create a

different character to the often more urban shared surface streets. It would be sensible to incorporate a different approach to planting and landscaping, and possibly different palette of paving materials, all of which would complement the different approach to architecture in these areas. The use of black estate railings and stone boundary walls for example, could be a strong reference to a more rural character.

Page 70 (onwards) – Character and Appearance.

There are two main approaches to defining character in these sorts of developments. The first is to link the street hierarchy (primary, secondary, shared spaces) to character, street design and materials, whereby a specific set of features is applied to each category, so that a legible series of spaces is formed. The second approach is to create distinct areas (as shown on page 71), each with their own character or identity, not tied to street hierarchy. Both approaches can work well, the main thing to achieve is a well-designed scheme which uses high quality and appropriate materials and finishes.

The main issue with the approach set out in the DAS is that essentially all the different types of spaces are treated in the same way within each of the three main character areas. The streets would align with each other across the development, but the architecture and materials would be defined by area. This doesn't respond to either the historic settlement pattern of Wickwar or the new development approaches on the eastern side of the main road. The approach in the DAS tries to combine the two approaches by treating the green edge as a distinct character which runs across all areas.

As such, there is something of an overall hierarchy to the scheme (particularly in terms of streets), and opportunities to create distinct character areas. The DAS establishes the critical difference between the green edge areas and the rest of the development. There are, however, a number of issues with each character area, as follows.

Page 72 – the recurring use of the recon stone image is not positive and looks very much like a concrete product. I would suggest that a different image is used, of either a natural stone, or a much better recon stone. It is acknowledged that natural stone will likely not be applied to all suitable properties, but we need to make sure that it is used on the key buildings and the best quality recon in other areas. It is good to see images of pantiles and plain tiles.

While not a big issue, the two smaller diagrams on page 73 could be a bit more representative of low and moderate densities – they are almost exactly the same and the low-density example should probably have more garages. The main image is useful, but we need to be really careful about agreeing to accept this DAS under Condition unless the applicant adds text to the effect of 'this is an illustrative diagram only'. The other thing to add is that the diagram shows a couple of large, detached properties with hipped roof forms, but we really shouldn't be using that approach given the context.

Page 74 – while the photos are useful as a reference, the use of a palette of coloured renders is completely inappropriate in this area, in terms of the material and tones. Render is one of the worst materials in terms of on-going maintenance and staining and really turns into a liability for residents. It would be much better to use a grey/buff multi brick as the primary facing material for this character area (as a reference to the natural stone and lighter renders), with natural stone to key plots. This would differentiate this character area from the Orchard View area and the Southern Gateway to the south.

Page 75 DAS – Again, same issue with recon image and need caveat for main diagram.

Page 76 DAS – The use of a combination of red/orange brick and render is not locally distinctive. A better approach would be to use a natural or recon stone applied to primary facades, with a red/orange brick to sides, rear, finished into quoins. Stone should still be one of the primary materials.

Page 78 DAS – the main materials should be natural stone and timber, not render and red brick. The Green Edge should be referencing the rural or countryside vernacular and/or the really interesting and traditional materials found in the back lanes of Wickwar and also offers an opportunity to add a contrasting material. Red brick could be used as a detailing material, to quoins, window and door surrounds.

Roof materials should be clay pantiles, not grey concrete tiles. The two photos are not appropriate for this character area and should be replaced.

The following is a summary of the distinct materials for each character area.

Orchard View – Natural stone, recon stone, and scattered render

Development Core – Grey/buff/light multi brick, natural stone (a more modern style)

Southern Gateway – Natural stone, some red/orange brick combined with render

Green Edge – Timber, natural stone with red brick detailing

Boundary treatments also need to be referenced in the DAS and the use of estate railings around green edges, and stone walls within scheme, would be supported.

Page 82 – the information provided within the DAS to support the inclusion of the shop is very limited.

Page 83 – under the secure by design section, the first bullet point should reference that only solid construction boundary walls will be accepted where an area of public realm sits adjacent to a private boundary. Defensive planting could also be used to enhance security and add to landscaping.

Page 84 – while I would of course defer comments on technical open space requirements to colleagues, there is an issue of the on-going maintenance of the areas of POS by future residents. This level of on-site provision could burden future residents with a significant financial liability. The pattern with this type of greenfield development is to provide as much POS as possible, partly to respond to the general countryside context, but also to make the passage through the planning process smoother, with officers, Members, and local people.

While responding to the landscape and open character of the area is critical, the maintenance liability cannot be ignored, particularly with the numerous nation-wide issues around management companies and the way that charges increase sharply over time. This issue is particularly concerning for the proportion of affordable properties and if the issues around management company contributions might also apply to those properties, making affordability even less viable for those residents. The use of private drives, while not objectionable, will also add to the area covered under the management company.

The other significant issue here is that most of the open space shown on the plan are attenuation basins which may not be usable for large parts of the year, depending on the detailed design.

## Conclusion

While only Access is being sought for permission, the principle of this scale and use of development is also the key issue to determine. My original comments (in black above) raised serious concerns regarding the overall sustainability of the development, given its location, issues around walking conditions towards the town centre, the lack of evidence to support the inclusion of a viable convenience store, and the implied impact that this car-based development would have.

Unless there is an actual mechanism which ties the permission to the provision of a convenience store, any housing development in this area should be seen as car-based, and therefore unsustainable.

There are still a number of significant issues relating to the presentation of proposed materials within the design statement, and their quality and appropriateness. As I have said above, I would support referring to the DAS under Condition if the DAS was acceptable. However, further work is needed in this area.

There is a real danger that this development will simply be another standard housing scheme, with no real distinctiveness or reference to the positive local vernacular or development patterns. There is very little in the DAS that explains how the local character has been used, in terms of development pattern, typologies and materials. This is perhaps one of the critical issues for the next stage of the planning process (Reserved Matters or a Full application).

From an urban design perspective, **I would still raise an objection based on the content of the DAS (the design of the scheme) and the lack of convincing evidence** around the provision of the convenience store (affecting the principle of development). There are certainly various ways in which amendments can be made to deal with many of the comments raised and I look forward to assessing further submissions.

#### 4.47 Public Open Space Officer

Full comments are available online but the comments are summarised below. Comments on amended plan have been *italicised*:-

Set out below are comments and recommended S106 requirements needed to address the impacts of the proposed development on public open space. These are based on the expected future population.

This is a new residential development and it is reasonable to expect the future residents to have access to a full range of open spaces. Where existing provision, in terms of quantity, quality and accessibility would be inadequate to meet the needs of future residents, then new provision and/or enhancement must be made in accordance with the appropriate local standards set out in Core Strategy Appendix 5.

An audit of existing provision has demonstrated a shortfall or absence of all categories of public open space.

The following table shows the **minimum** open space requirements arising from the proposed development and shows the contributions that will be requested if open space is not proposed on site. Providing more than the minimum policy requirement of one category of POS does not mitigate for an under provision of another category.

**Policy CS24 requires provision to be delivered on site unless it is demonstrated that partial or full off-site provision or enhancement creates a more acceptable proposal:**

Category of open space	Minimum spatial requirement to comply with policy CS24 (sq.m.)	Spatial amount proposed on site (sq.m.)	Shortfall in provision (sq.m.)	Contributions towards off-site provision and/or enhancement	Maintenance contribution
Informal Recreational Open Space (IROS)	4,968	The Framework Masterplan shows that subject to suitable design it is likely that there is scope to provide sufficient IROS and N&SN on site. Applicant states 23,800sq.m. (excluding attenuation basin) is proposed in the DAS but the Masterplan states 32,000sq.m. Masterplan 3002 rev M states 32,500sq.m. of IROS and N&SN on-site whereas DAS rev B states			
Natural and Semi-natural Open Space	6,480				

(NSN)		23,100sq.m.			
Outdoor Sports Facilities (OSF)	6,912	0	6,912	£402,796.11	£121,913.16
Provision for Children and Young People (PCYP)	1,080	1,100	0	N/A	
Allotments	864	900	0	N/A	

A plan is required indicating the types and quantities of public open space proposed, along with details demonstrating how the application satisfies the requirements of Core Strategy Policy CS24. Although the plan would be indicative, we would need to agree the plan at this stage.

The DAS states for all categories of open space other than outdoor sports facilities, the development either meets or exceeds the required level of provision. I would point out that that the figures quoted in our table are MINIMUM policy requirements.

*Masterplan rev M shows 3.25ha of on-site open space including Informal Recreational and Natural & semi natural (urban) green space whereas the DAS states that 2.31ha of Informal Recreational and Natural & semi natural green space is proposed and that the attenuation basin is not included with POS calculations. Plans and documents should not contain discrepancies. Despite this discrepancy, there is scope to provide more than the minimum policy requirements for both of these categories of open space, which would be fitting for a development in this location.*

*In order to make the POS usable for the community, I would suggest sealed surfaced routes should be provided, which would be inclusive and not compromised by wet weather and erosion and traversing by machinery; something such as a tinted tarmac. Seating and bins should also be provided to encourage use of the POS. Paths through POS should be 1.5m wide as a minimum. The Drainage Strategy and Landscape Strategy show that in places the areas available for the proposed pathways are narrow and are likely to be compromised by the presence of boundary hedges and the drainage proposals.*

Outdoor Sports Facilities - None are proposed and no justification as to why off-site provision creates a more acceptable proposal than on-site. It is clear from the application documentation that although the current application is for 7.89ha, the applicant intends to apply for permission on 38ha in total. The current application is therefore only 20% of that land. I consider that they should

be providing entirely for their own needs within this application or within their land.

If permission were to be granted for the outline application, I feel it should be on the basis of four options.

1. A combination of on-site provision of something like a MUGA plus the balance on the remainder of the 38ha
2. A combination of on-site provision of something like a MUGA plus the balance by way of off-site contribution
3. An off-site contribution
4. If further development is approved, the entirety of the requirement should be delivered within the Bloor land.

I am not sure how feasible this is, and I know we can only look at the current outline application but the documentation is clear:

*The location and size of the LAP has been amended. Measured from the Landscape Strategy the size of the LAP is now circa 126sq.m. The Landscape Strategy shows access into the LAP from adoptable highway via a proposed footpath through POS. The LAP is located near to existing and proposed tree planting. There are likely to be issues with shade, root protection area constraints and potential effects of roots on surfacing, free space areas, etc.*

*The location of the LEAP has been amended. Measured from the Landscape Strategy the size of the LEAP is circa 850sq.m. The Landscape Strategy shows access into the LEAP from adoptable highway via a proposed footpath through POS. The LEAP is located close to residential property and is still likely to breach minimum separation distances; this would not be acceptable. There are also likely to be issues with shade, root protection areas and potential effects of roots on surfacing, free space areas, etc. as both existing and proposed trees are shown in close proximity. The Drainage Strategy Sheet 2 P04 shows both the foul and surface water sewers running through the LEAP, and a surface water sewer manhole is proposed within the LEAP. These would be exceedingly constraining features and the drainage must be kept out of the LEAP.*

*The Landscape Strategy gives the following details - "Play areas to be of natural character, incorporating wooden equipment and providing accessible doorstep play for residents". In order to count towards policy provision, the LAP and LEAP should be fully equipped and as inclusive as possible, catering for children with differing abilities.*

*Allotments – 0.09ha of allotments are proposed. Allotments must be laid out, levelled and topsoiled, with appropriate facilities including secure robust storage for each plot and a water supply (not just water butts) within reasonable reach (maximum distance of 30m from each plot), delivery area and parking for bicycles and cars. The paths between plots should be of a width adequate for access by wheelchair. The plots themselves should be clearly demarcated and*



*the overall allotment area should be fenced. Consideration should be given to their location to avoid shading & nutrient demands from existing and proposed trees. Additional information has been provided on pages 88-89 of the DAS rev B which is welcomed. A parking/delivery area is shown with four parking spaces and a turning area. This area would need to be reserved for the allotment holders. Small sized plots are proposed; I would recommend at least one, or even two smaller sized plots are made suitable for disabled use, including wheelchairs (path width, surface, raised beds, location of water supply, etc.). A central area with sheds and a water supply are shown and, providing this area is less than 30m distance from each plot, this is acceptable. The allotment area is still located within close proximity to the existing tree belt and consideration should be given to its location to avoid shading & nutrient demands from existing and proposed trees.*

*With reference to the following extract from the DAS, please note that the allotment plots should be for renting to residents of the development only, as there is not a massive amount over the minimum policy requirement.*

*The applicant must demonstrate that the elevated zinc levels will not have a detrimental impact upon plant growth anywhere on site but this is particularly important for the proposed allotment area.*

*The DAS rev B page 90 states that the basins “are designed to be a range of depths between 1m and 1.5m, with a maximum gradient of 1:3 for slopes. This will allow them to be accessible amenity space.” The basins and swale still dominate the areas of POS and I do not consider SuDS feature to be “accessible”.*

### **On-site open space maintenance**

Core Strategy policy CS24 seeks appropriate arrangements to secure the satisfactory future maintenance of any open spaces and outdoor recreation facilities (for sport, recreation and play) that are provided in conjunction with new development. Where these are provided on site the Council may be willing to negotiate their adoption and future maintenance providing that the developer meets the cost associated with future maintenance and all fees associated with land transfers. The Council will not adopt timber play equipment and will not adopt play equipment sited above underground structures such as attenuation tanks or utility easements. The Council will not adopt loose fill surfaces in play areas e.g. sand or bark. The applicant must clarify his intentions for the management and maintenance of POS, SWI, etc.

If the applicant proposes private management of POS and surface water infrastructure the Council must be confident that the value of any service to the public is sustainable and does not create ambiguity in how people access those services should they have concerns or requests; it is important that the community receives a seamless service. Provisions to ensure suitable and secure in-perpetuity arrangements for operation, management and maintenance of all the public open spaces, ancillary open space and surface water infrastructure (SWI within POS that is not adoptable by a statutory

undertaker) will need to be incorporated into the Section 106. The Council charges a fee (£63.96 per 100sq.m. plus £615.90 core service fee) to inspect the open spaces to ensure their compliance with the approved plans prior to transfer to the private management entity.

### **How the Environment & Community Services requirements for Open Spaces meet the Community Infrastructure Levy (CIL) tests**

#### **Necessary to make the development acceptable in planning terms**

Adopted planning policy requires sustainable development and provision of a range of good quality well connected open spaces where existing open spaces are not easily accessible or do not have the capacity to fully meet the needs arising from the proposed development. Without provision or enhancement of open spaces people living here would not have adequate access, which would prevent them from developing as a healthy, socially sustainable community. Without sufficient open space to meet local need this development would lead to increased pressure on existing facilities elsewhere.

#### **Directly related to the development**

Contributions towards off-site enhancements are only sought when there is evidence of a local shortfall in either quantity and/or quality/capacity to meet the additional demand arising from the new development and the policy requirements for open space are not being provided for on site.

If provision is not made on site, provision/enhancements would be made as close to the development as is feasible to serve the future residents of the proposed development, and are likely to be at the following area of open space or such other open spaces as may be appropriate:

Outdoor Sports Facilities - King George V Playing Fields, Wickwar

#### **Fairly and reasonably related in scale and kind to the development**

Where provision in line with minimum policy standards is not provided on site, the amounts requested towards the provision and/or enhancement of off-site open space and future maintenance are directly in scale with the quantity of open space required to offset the effect of the proposed development on existing provision; this is demonstrated in our calculations.

All calculations are based on the expected future population of the proposed development calculated using Census 2011 data on household size and the net gain and mix of dwellings proposed.

The calculator used to give costs for provision/enhancement and maintenance is regularly updated and reflects the type of spaces and facilities that the Council would expect to see delivered based on examples that have been adopted from other new developments, which have taken place within South Gloucestershire.

The capital contributions are based on a range of industry costs for the provision of open space facilities, and the maintenance costs are routinely

tested through APSE (Association of Public Sector Excellence). They are therefore considered reasonable and fully justified in order to ensure standards of open space meet standards of appropriate national bodies e.g. Sport England, national sporting governing bodies, Fields in Trust, National Society of Allotment & Leisure Gardeners and material relating to the Green Flag quality award scheme.

	Informal recreational open space	Natural & semi-natural green space	Outdoor sports facilities	Provision for children & young people	Allotments
Average provision/enhancement cost per sq.m.	£29.3029	£16.2383	£58.2749	£195.2660	£10.6865
Average 15yrs maintenance cost per sq.m.	£51.6516	£26.9377	£17.6379	£205.3237	£13.6260

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provision/enhancement and maintenance costs for each category of open space per sq.m.

NB These do not cover specialist features e.g. retaining structures, drainage structures such as underground tanks, penstock valves, hydrobrakes, etc. Should any of these be likely, a table of additional costs would need to be appended to the Section 106 to enable their cost to be factored into the maintenance contribution formulae.

These figures are subject to indexation using the Updating Percentages published by the Building Cost Information Service (BCIS) for the Schedule of Rates for Grounds Maintenance 1987.

#### 4.48 Wessex Water - *On Original submission*

No Objection - Foul – No Objection to strategy which proposes foul water to drain via network of adoptable foul water sewers to an adoptable pumping station in the NW of the site. This will pump foul water east to public sewer.

Surface Water Sewerage – Must follow SUDs hierarchy. The surface water strategy and maximum discharge rates from the site will need to be agreed with the LLFA.

Developers are expected to implement a full suite of SUDS Features. Elements of the surface water system may be eligible for adoption.

### *On amended plans*

No change in comments.

4.49 NHS - No comment received.

4.50 Comments from Local Residents

4.51 On Original Plans

#### 15 letters in support:

- 1) All areas need housing but needs to be done with correct infrastructure.
- 2) Village needs a shop, deli, duck pond and pre school etc.
- 3) Village school should be for local children – not those from Yate – so need houses to fill it.
- 4) Need to encourage walking.
- 5) Will save the village from 'death' as it has lost so much in recent years.
- 6) Shop needs to be on the road frontage so as to capture commuting trade.
- 7) Fair pricing will mean young people will not be priced out.
- 8) It will not destroy the countryside but will allow people to afford a house where they grew up.
- 9) Shop will create jobs.

#### 613 letters of objection

- Location and scale
- Such a development should only be considered as part of a wider planned strategy.
- Massive developments in Yate and Chipping Sodbury absorb necessary housing.
- Density is akin to inner cities.
- Bigger than the other 2 developments combined and is land grabbing opportunity showing the Council as weak.
- There are currently at least 20 new developments half-finished or planned in the area so what is the need for another.
- Along with approved solar farm within a mile of Wickwar, more housing will mean there is no countryside left.
- Loss of productive agricultural land.
- If these houses are built, combined with the other 2 new developments (170 homes), Wickwar will have had 64% increase since 2017.
- Government policy guideline for new developments favours previously developed sites or in-fill – Not Greenfield sites.
- If a proper Local Plan was to be completed by South Gloucestershire I am sure that this would not be the favoured site for development. Why can't any decision wait until the Local Plan is complete which will properly assess the best site for development?
- The shop has the potential to attract more traffic to the village. No fixed operator.
- The proposed Green Infrastructure is likely to be the same poor quality that has been implemented across the new housing already built...Trees are planted into

waterlogged compacted soil and then left. Species rich grassland is left unmaintained and quickly gets taken over by ruderal species with low ecological value. Dead trees and hedging are not replaced.

- Ribbon development is not community orientated
  - Not needed to meet 5 YHLS target.
  - Landscape Officer objects due to encroachment into the countryside.
  - The existing housing on the southwest side of the village will be completely enveloped by this proposed development, harming the aesthetic of the village.
  - Should look at the Marshfield Community led development of 12 new homes.
  - The other developments should be built and occupied before any more permissions are granted.
  - The new houses opposite dominate the view and the village only gets away with it as the landscape on the application side of the road remains. If this is lost, then the sense of place will be lost.
  - All towns and villages are joining together.
- 
- Transport/Sustainability
  - Road is inadequate now, so will not cope with additional traffic. Queues at both ends of High Street and bottle necking at certain pinch points.
  - Public Transport is shocking.
  - No safe cycle routes to nearest facilities.
  - No amenities within 10 minutes walking distance.
  - Wickwar needs a bypass.
  - Roads full of potholes and speed humps are urbanising the village. £1 million hasn't made any difference.
  - No safe crossings. Wheelchair users cannot access the village centre
  - No employment in Wickwar so everyone will need to commute.
  - Increase in road accidents.
  - Traffic Assessment in Section 3.3 based on assessment undertaken in March 2016- there has been a significant increase since then.
  - Congestion at M5 J14.
  - A report by Transport for New Homes - highlighting the unsustainability of developments like P22/01300/O Extract: New greenfield housing developments are locking residents into car dependency, making every day journeys impossible without a vehicle, a new report has found. Meanwhile, pledges for walking, cycling and public transport are often left unfulfilled. The group Transport for New Homes (TfNH) visited 20 new housing developments in England, finding that while those on urban brownfield sites generally lived up to sustainable transport pledges, greenfield sites were often far from shops and amenities, without public transport, cycling links or even pavements, and the homes themselves were seemingly designed around car parking.
  - Information gained through FOI Request FIDP/016193-20 has confirmed: 1) There are no plans to amend travel assistance policies in Wickwar to increase capacity of contracted transport 2) For those children travelling to Chipping Sodbury they are given tickets on a Stagecoach service which is both infrequent and not under the control of South Glos council. 3) The council has refused applications for travel assistance to Brimsham Green and parents have been forced to go through the

appeals process to claim their entitlement. 4) There are no plans to help 16-18 year-olds get to their place of education because the Council are not required by law to provide this.

- The B4509/B4060 'problem' junction was the only one in the latest survey that was re-assessed on 2021 survey results at a time before the end of all Covid restrictions.
- The transport document in the application suggests that the first bus from Wickwar is 6.35am and goes to Yate on a circular route. This is technically correct but the journey would take in excess of 1hr and 15 mins arriving in Yate at 7.50am. The first viable bus leaves Wickwar at 8.35am and so too late for many commuters, particularly those travelling to Bristol. Due to the distance of Yate railway station from yate shopping centre, the trip would require 2 buses before even getting to the station.
- People will drive to bigger shops rather than walk to the proposed shop.
- Frith Lane becoming a rat run to avoid high street congestion.
- Close to Amberley Way roundabout which is dangerous.
- Conflict with horse riders.
- Shop will only be useful for top-up shopping and weekly shopping will require a car trip to Yate or Chipping Sodbury.
- Additional cars will add to pollution and poor air quality.
- Driving through the village is like an assault course.
- 10 speed humps have been installed in a mile through the village to try and slow dangerous drivers.
- Not a sustainable location due to absence of facilities. This was raised with the Linden development.
- Wickwar suffered a catastrophic gas explosion at the North end of the High St in 1987 that was attributed, in part, to overweight lorries fracturing the gas main. It was repaired an 18T restriction put in place and traffic lights installed to prevent HGVs trying to pass one another, doubling the load. This is not adhered to. The road is not suitable for delivery lorries.
- HGVs approaching from the south very often unload on the road, can't turn around and continue empty through the limit restriction illegally.
- Huge HGVs block the road/high street. In 1 day there were 18 overweight NGVs ranging from 26T – 44T.
- The supposition that traffic will go south from the site is wrong – it will access M5 and Renishaw etc.
- A safe cycling route from Wickwar to Yate has been on the Council's list for over 5 years.
- The area proposed for the northern access is regularly under water in the winter (hence the thriving willows).
- How can a development with 300-400 vehicle movements a day be sustainable?
- No mention of PV, adequate EV charging facilities.
- The transport plan makes reference to a cycling officer – but this is not needed..the roads are too unsafe to cycle.
- The Transport Plan ignores any impact on the junctions of the B4509 and B4058.
- There will be construction noise 7 days a week.
- The Highways Officer heavily criticised the submissions including pointing out that there is no safe walking infrastructure from the site to Yate.

- Loss of agricultural land, which as the population grows is needed to grow food.
  - The travel plan data is from 2016, so is out of date.
  - Will bring minimal employment to Wickwar.
  - The submitted method of travel to work data from the 2011 census shows 84.3% of journeys to/from work utilise a car/van (national average is 60.7%) and assuming 2 adults per new dwelling would lead to another 303 additional journeys which would have a significant impact on morning/evening peak traffic.
  - If the development takes place the following need to happen: Wickwar train station to re-open; bus service improvement; guarantee no further development in the future; investment into protecting and enhancing woodland and wildlife; houses fitted with electric charging points and renewable energy sources.
  - The application fails on every level of the Council's objectives regarding Managing Future Developments – Scale; Transport; Sustainable.
  - Speed humps group cars together – need high-definition cameras.
  - The proposed footways do nothing to address the existing poor and narrow footways elsewhere in the village that disadvantage mobility impaired residents.
  - The isochrones show too many on road routes that are too hazardous to use.
  - The northern access area is regularly under water and the removal of willows will exacerbate this.
  - The traffic data is generated by a programme ARCADY, it does not use real data.
  - Tinkering with the traffic lights at High St/Station Rd/The Downs has not improved things.
  - Transport plan also ignores impact at B4509/B4058 junction at top of Charfield Hill.
  - It appears that a curbed access has been formed, which looks like undue process.
  - Delivery lorries will break the weight limits on the access roads. This already occurs and the police have been involved.
- 
- Infrastructure
  - Wickwar has no infrastructure to support the houses.
  - The school is full so some people have children in 2 different schools.
  - No doctor's surgery or dentist.
  - Shop will not survive. Village shop recently closed.
  - No facilities for youths. Need a bike/scooter track.
  - Because of lack of facilities – village will become even more dormitory.
  - Wickwar has recently lost its satellite doctors service, will lose its bus service and the mobile library is under threat.
  - A farm shop is not the type of shop that is required... should be a community type shop. Only facilities Wickwar has are a coffee shop; a hairdresser; a social club, pub and primary school
- 
- General
  - Once the village is gone, it's gone.
  - Impact on existing residents of years of construction.
  - Materials used on recent developments are not in keeping with Wickwar.
  - Detrimental impact on wildlife.

- Erosion of character of village and conservation area.
- The way that secondary school choices are being provided is likely to create a discriminatory divide with children on new developments being forced to schools in Chipping Sodbury when the nearest school and other village children go to KLB.
- Bloors claim that they have consulted the community, but have not responded to issues raised.
- Frequent power cuts.
- Developers are just being greedy.
- What are the vacancies in any of the businesses that are in Wickwar.
- Private gardens should not be counted as green infrastructure as there is no control over their future composition. The actual green edges are therefore reduced.
- Cumulative impacts.
- Biodiversity will only increase in urban species...loss of other biodiversity.
- Wickwar features in 3 of the 9 Strategic Green Infrastructure corridors and this application will go against that.
- Additional housing puts additional pressure on Lower Woods SSSI by adding people and dog walkers to the woodland environment, which is damaging the paths & flora with dogs disturbing nesting birds etc.
- The housing is not affordable to locals.
- Can the sewage system cope?
- Potential flooding.
- The field has natural spring and pond.
- Electricity and internet is poor to the area.
- Because the other developments aren't finished the end result of them is not known.
- Having the new housing at the end of the village creates an 'us and them' feel.
- 'Village life' is an important English culture.
- Lack of affordability for young people and therefore doesn't solve the housing crisis.
- New builds are very poor quality.
- Increase in crime in the area no community feel.
- No site notice on site.
- Destruction of landscape... a reason why people moved there.
- Profit over community.
- Design lacks imagination and design of entrance will increase danger on the road into the village.
- Paragraph 64 of NPPF states that poor design should be refused.
- Cumulatively impact of cars seeking motorway access (both from this and other consented schemes) on J14 of M5.
- The land should be kept in agriculture to benefit climate change and lessen reliance for food from other countries.
- Lack of community engagement.
- We responded to the pre planning application consultation and we have to say that we were shocked by the response we received for the council. The way it was written, praising the application and stating reasons why it should be approved, made it feel like this is already a done deal between planning officers and the developers. This is



contemptuous and just shows how broken the planning system is and how undemocratic and weak the council are.

- Increase in burglaries due to additional housing.
- Loss of village community.
- Not enough carbon neutral thinking or use of solar and ground source.
- Overpriced large housing when smaller affordable housing is needed for young villagers.
- Flooding increase.
- It's a way for the Council to make more money from Council Tax.
- Developer refused to attend a public meeting and was obstructive with the PC.
- The development will bring minimal new employers to Wickwar, nor increase employment opportunities for existing businesses.
- Will bring bare minimum additional sporting/leisure facilities for Wickwar.
- The Environmental Policy and Climate Change Team provided a very scathing assessment of the proposed energy efficiency and future proofing of the dwellings.
- The Heritage Officer identifies harm to heritage assets.
- The drainage officer states that the site is at risk of 1 in 30-year surface water flooding which has not been addressed.
- There is reference to this site being phase 1, but no information is given about further phases.
- Dedicated spaces to exercise dogs is required.
- There are 'No More Houses' posters in nearly every house in the village.
- Preliminary works put in with a curbed access and a gap in the new speed bumps that match the proposed junction. Potential Legal claim for undue process.
- Blocking of currently open views to the East.
- The residents of the Bellway estate are already complaining about lack of parking.
- Very stressful to keep living in fight mode against all the developments.
- Issues with uploading objections to the web.
- Increased litter; footpaths eroded.
- Raised levels of zinc on site maybe damaging to health.
- Water treatment facility already at full stretch.
- The submissions are just generic and not relevant to the village.
- SG Climate Emergency. Promised cycling route from Yate Wickwar has not materialised.
- Will not help SG meet its zero net carbon target.
- No pre-application consultation done by developers.
- Health and Safety is an issue with this developer.
- Need more mixed housing of 1, 2 & 3 bed to allow young people to stay.
- Impact on Heritage Assets as set out by Council Conservation Officer.
- Loss of beautiful views on approach to Wickwar.
- Area should be used to increase renewable energy sources.
- The catchment for the school bus to KLB secondary school stops at junction with Amberley Way.
- Removal of green space that absorbs excess water run-off.
- New estates look the same throughout the country, eroding village characters.

- The number of allotments is insufficient...there is already a waiting list in the village.
- Brownfield land should be sought and built on.
- Effect on biodiversity and nature.
- The neighbouring site's play area still isn't open 2 years on.
- Objections are split between comments and documents sections.... This should not mean they aren't read in conjunction.
- Against Government objectives for climate change.

On Revised plans:-

Issues not resolved & same objections as before summarised as:-

1. No consideration to increase in traffic. Whole road infrastructure needs an overhaul.
2. The promise of a shop is worthless given the last one closed down because people shopped elsewhere.
3. How does the harm identified to Heritage Assets balance with NPPF para 202.
4. The main road is deteriorating and lanes are becoming dangerous.
5. Soon Wickwar will no longer be a rural community.
6. Impact on wildlife.
7. Wrong development in wrong place...unsustainable location.
8. Allotments right next to the road – pollution from cars.
9. Need a skate park for the young people.
10. A development of this size means years of building with noise, disruption etc.
11. Wickwar needs a bypass.
12. Contrary to local plan.
13. Local school is full.
14. Walking and cycling in the area is hazardous.
15. The 84 & 85 bus service is discontinued.
16. Charfield Station will mean more commuters through Wickwar.
17. Frith Lane floods.
18. The Traffic Reports are based on faulty data that has not been rigorously assessed.
19. Empty properties and shops in towns should be used.
20. Sustainability doesn't just mean solar panels and EV charging points.
21. Frequent power cuts and poor broadband means that facilities are already overloaded.
22. Lack of Foul sewage capacity.

## **5. ANALYSIS OF PROPOSAL**

### **5.1 Principle of Development**

The proposal is for up to 180 dwellings with 2 access points onto the B4060 (Sodbury Road, Wickwar), together with a shop and associated infrastructure.

## 5.2 Settlement Strategy in South Gloucestershire

- 5.3 The National Planning Policy Framework (para 2) following Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 states that applications should be determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.4 As set out in the National Planning Policy Framework (paragraph 7) the purpose of the planning system is to contribute to the achievement of sustainable development. The three overarching aims of achieving sustainable development are set out in the following paragraph (8) covering Economic, Social and Environment objectives.
- 5.5 These objectives seek development to take place in the right place having regard to the provision of infrastructure, accessible services having regard to the future needs of the community and reducing the use of natural resources. The Locational Policies set out below are fundamentally in place to secure sustainable patterns of development and to create and plan comprehensively for sustainable communities rather than sporadic piecemeal development.
- 5.6 The application site is situated outside of a defined settlement boundary of Wickwar and therefore is situated in the open countryside for decision making purposes. The site is not located within the Green Belt or Cotswold Area of Outstanding Natural Beauty.
- 5.7 Policy CS5 of the South Gloucestershire Local Plan Core Strategy confirms among other matters that development will be concentrated within urban areas and these areas are set out in the policy. The policy states that outside of the Green Belt development on land such as the application site which is located in the open countryside outside a settlement boundary (but outside the Green Belt) should be strictly limited (CS5 5e). The proposed development of 180 residential units is therefore contrary to this policy.
- 5.8 However, Policy CS34 indicates that settlement boundaries around rural settlements should be maintained unless they are reviewed through Neighbourhood Plans (NPs), the Policies, Sites and Places DPD (PSP) or a replacement local plan, following local and stakeholder engagement. Wickwar does not have a NP and the Core Strategy and PSP were adopted more than 5 years ago and have not been reviewed. The South Gloucestershire New Local Plan is at an early stage (Regulation 18) in its preparation, and therefore carries limited weight (in line with NPPF para 48b). The Local Plan timetable is available on the Council's Website.
- 5.9 The Local Plan is at an early stage as it follows on from the Joint Spatial Plan (JSP) which was not continued after a Public inquiry and the more recent Spatial Development Strategy SDS), on which work ceased in May 2022.
- 5.10 The housing requirement on which the spatial strategy is based is reliant on a Strategic Housing Market Assessment (SHMA) that pre-dated the first iteration

of the NPPF in 2012. It therefore had no regard for the duty to co-operate or to consider the needs of the wider Housing Market Area (HMA), which includes Bristol, which is unable to meet its housing needs within its own boundaries.

- 5.11 Although the Examining Inspector found the CS sound, this was on the basis of an early review based on a Framework-compliant SHMA. It was anticipated that the new SHMA would be produced by 2015 and thus the examining Inspector considered that the requirement to review the CS by 2018 would be reasonable.
- 5.12 No update SHMA has been produced for the HMA as both attempts at a joint approach have failed, the most recent being work on the Spatial Development Strategy, which ceased work in May 2022. South Gloucestershire therefore needs to produce its own plan whilst co-operating with its neighbours on the issue of housing needs within the HMA. Whilst the duty to co-operate is not a duty to agree, it is likely that South Gloucestershire will need to play its part in helping meet the wider needs of the HMA.
- 5.13 Two Inspectors have recently, in their determination of appeals (Land West of Park Farm, Thornbury (LWoPF) and at Old Sodbury), stated that the housing requirement in the CS and the settlement boundaries that depend on it are not consistent with the Framework and are thus out of date. This is regardless of the 5-year housing land supply which both Inspectors somewhat skirted around with the Inspector for Old Sodbury not giving any figure for the 5 Year Housing Land Supply and the Inspector for LWoPF attributing 4.77 years, but making it clear that it was a snapshot in time and making their decision on the basis of 'notwithstanding' that figure.
- 5.14 Policy CS5 seeks to strictly limit development in the countryside, directing it to more sustainable locations. For the same reasons as set out above, this policy is not consistent with the NPPF and is considered to be out of date.
- 5.15 The housing related development plan policies for the determination of this application are CS5 & CS34, which are not consistent with national policy in the NPPF and are therefore out-of-date. The implications of this are discussed later in this report.
- 5.16 Housing Supply in South Gloucestershire
- 5.17 Wickwar has undergone two relatively new (and nearly completed) residential developments in recent years amounting to a total of 170 dwellings on the eastern of Sodbury Road, opposite the proposed development. These are land south of Poplar Lane for 80 residential units (PK16/4006/O granted 2017) with associated reserved matters application PK17/5966/RM (granted 2018) and Land south of Horwood Lane, Sodbury Road for 90 residential units granted under PK17/4552/O (granted 2018) and the associated reserved matters application P19/5258/RM (granted 2019).
- 5.18 Both applications were presented to Committee with recommendations to approve based on the fact that the council did not have a 5-year housing land supply at the time of determination. In the case of PK16/4006/O it was set at

4.28 years and for PK17/4552/O it was set at 4.66 years. In the Planning Balance of those applications, it was concluded that the benefits of the proposals significantly and demonstrably outweighed the dis-benefits.

- 5.19 Paragraph 74 of the National Planning Policy Framework (NPPF, July 2021) requires authorities to identify and update annually a supply of deliverable sites sufficient to provide five years' worth of housing against their housing requirements. Housing requirements are set out in adopted strategic policies, or against their local housing need [using the standard method for calculating local housing need], where the strategic policies are more than five years old.
- 5.20 As the Council's Core Strategy (2013) is now more than five years old, in accordance with the NPPF, the Council has identified and updated a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing supply against its local housing need (LHN).
- 5.21 The Council published its 2022 Authority Monitoring Report covering April 2021 to March 2022 with the Housing Land Supply covering the 5-year period 2022/23-2026/27. The 5-year supply was declared at 5.35 years. This includes the required 5% buffer in accordance with paragraph 74 of the NPPF, given the Council's 2021 Housing Delivery Test (HDT) is 133%. A 2021 figure is used because as of March 2023 the government had not published the 2022 HDT results for LPAs.
- 5.22 In terms of the Housing Delivery Test (previous 3 years), which is a mechanism specifically designed to assess an Authority's past performance on housing delivery, South Gloucestershire Council has comfortably passed the Housing Delivery Test and can demonstrate a very strong housing delivery track record with scores of 2019 – 134%, 2020 – 125% and 2021 at 133% over the past three years (The 2022 figures have not yet been published). Clearly, a Council's housing delivery test results are an important factor when considering if a council is demonstrating good housing delivery performance and is likely to be able to sustain that.
- 5.23 It is acknowledged, notwithstanding that the Council is stating that it meets its housing needs, as set out above, that the provision of 180 residential units with 35% of those being affordable provides a social benefit (one of the dimensions of sustainable development). In addition, there are just 2 landowners which reduces potential legal issues that could delay construction and it would be possible to complete some of the units within a relatively short period. At this stage the rate of delivery is not possible to predict, but it is likely that at least some houses will be delivered within 5 years. Dwellings to support the Council's 5 year supply provides a benefit of the proposal to be considered when undertaking a balancing exercise at the end of this report.
- 5.24 The published completions (taken from the 2022 Authority Monitoring Report covering April 2021 to March 2022) are as follows: -

### Analysis of completions in current monitoring year (2021/2022)

	South Glos Total
New build completions	1,577
Demolitions	122
Change of use (net gain)	182
Conversions (net gain)	20
Other gains	0
Net additional homes	1,657

**Table 6.2**

Source: Strategic Planning Policy and Specialist Advice Team (South Gloucestershire Council)

- 5.25 Of these completions 531 (32%) were in the north fringe, 386 (23%) in the east fringe, 298 (18%) were in the Yate and Chipping Sodbury area, 71 (4%) in Thornbury and with those completed elsewhere as 371 completions (22%). Those completions in Wickwar for example, would have contributed to this latter figure, as would any completions elsewhere in the authority that fell outside a settlement framework boundary.
- 5.26 Paragraph 74 of the NPPF requires that the supply of specific deliverable sites should also include a buffer and because the 2021 Delivery Test is at 133%, (which is in excess of the 85% delivery target) only a 5% buffer is required so that choice and competition in the market for land is appropriate.
- 5.27 As the Council's Core Strategy is now more than 5 years old, in accordance with the NPPF, the Council has identified an updated supply of specific deliverable sites, sufficient to provide a minimum of 5 years' worth of housing supply against its Local Housing Need, (calculated using the new standard method of calculating housing need).

### Five-year land supply calculation based on CLG 2014-based Household Projections

	<b>Numerator (identified supply)</b>	<b>Dwellings</b>
A)	Total identified deliverable supply 2022/23 to 2026/27	7,673
	<b>Denominator (housing need)</b>	
B)	Standard method for calculating Local Housing Need based on ONS 2014-based HHPs and 2022 affordability ratios)	1,366 <sup>4</sup>
C)	5% buffer to ensure choice and competition in the market for land (NPPF para.73 a) (B x 0.05)	68.3
D)	B+C	1,434
E)	<b>Five-year land supply (A/D)</b>	<b>5.35 Years</b>

**Table 6.5**

5.28 The figure of 7673 units is the figure that the Council concludes is the trajectory of built units to come forward based on monitoring and projection, largely based on developer information, but also reasonable assumptions by the Development Management and Major Sites Team Leaders. This supply figure is frequently challenged by developers, because it is not an exact science. However, the figure is based on sound reasoning and predictions and is given full weight in the application determination process.

5.29 As the Inspector at the West of Park Farm Appel noted, her 5yr HLS figure of 4.66 years was just a snapshot in time. There are a number of sites that have recently been granted planning permissions which would boost that supply. Given these, together with the published figure of 5.35 years of supply, the Council is considered to be in a strong position to demonstrate compliance with the 5 YHLS requirement.

#### 5.30 Affordable Housing

5.31 In the year ending April 2022 there were 562 Affordable Homes completions, of which 559 were new build and 55.7% of which were in the urban areas of the North and East Fringes of Bristol. Of the 562 homes, 282 were for social rent, 56 were for affordable rent and 224 were for shared ownership. The number of dwellings completed is set out below, noting the anomaly of 2020/2021 when the Covid pandemic stalled house building.

## Policy CS18: Gross affordable housing completions

Year	Number of completions
2013/2014	298
2014/2015	326
2015/2016	263
2016/2017	360
2017/2018	368
2018/2019	624
2019/2020	565
2020/2021	403
2021/2022	562

**Table 6.11**

Source: Strategic Planning Policy and Specialist Advice Team / Housing Enabling Team (South Gloucestershire Council)

5.32

### *South Gloucestershire's Affordable Housing Need and Projected Supply*

5.33 The most up to date evidence regarding affordable housing need for South Gloucestershire is the West of England Local Housing Needs Assessment (LHNA) published in September 2021.

- The LHNA 2021 identifies affordable housing need over 2 planning periods – for 15 years 2020-35 and for 20 years 2020-40.
- There is currently a need for 6,165 affordable homes for South Gloucestershire in the plan period 2020-35, or approximately 411 homes per annum.
- There is currently a need for 7,485 affordable homes for South Gloucestershire in the plan period 2020-40, or approximately 370 affordable homes per annum.

5.34 Using the higher figure as a 'worse case' position the identified affordable housing need for 2020-35 is 6,165 or an average of 411 per annum.

5.35 The Authority is of the view that it can demonstrate it currently has an appropriate supply of affordable housing to meet its annualised level of identified affordable housing need.

### *5.36 Historic Affordable Housing Delivery*



- 5.37 The LHNA 2021 is the most up-to-date evidence of affordable housing need and therefore includes any net effect of under/over delivery of affordable homes which may have occurred historically in South Gloucestershire. The easiest way to see this is, if there has been under provision previously more households would form part of the current assessed affordable housing need identified in the LHNA (i.e. the backlog would be higher). Any previous households whose need was not met will have left the area, are no longer in need, or remain in need and have been counted within the identified affordable housing need in the LHNA.
- 5.38 Undertaking an analysis of historic delivery is therefore not required. The LHNA 2021, which does not break down to a sub-area and identifies district-wide need, therefore remains the most up-to-date assessment of affordable housing need.
- 5.39 Notwithstanding the Inspector's comments at the LWoPF appeal, who queried deliverability targets in the district, it is considered that the Council is therefore able to demonstrate a robust history of delivery of Affordable Housing, which retains significant importance in the determination of housing applications and will be further analysed in the Planning Balance at the end of this report.
- 5.40 Access to Services and Local Facilities
- 5.41 Key to the social role in achieving sustainable development is the creation of built environments with accessible local services that reflect the community's needs and support its health, social and cultural well-being. Access to facilities that can be accessed by walking, cycling and public transport is considered a vital component in determining the overall sustainability of a development (this is set out in the NPPF which indicates that development should be well located with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being).
- 5.42 Policy CS8 of the Core Strategy also states that: 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. Developments which are car dependent or promote unsustainable travel behaviour will not be supported.
- 5.43 The site is located approximately 6.4km to the south and approximately 7.5km from Yate, which would be the closest town which offers supermarket shopping, access to health services etc.
- 5.44 PSP11 (3 i and ii)) of the Policies, Sites and Places Plan states that: Residential Development proposals will be acceptable where they are located on: Safe, useable walking and or cycling routes, that are an

appropriate distance to key services and facilities and .....where some key services and facilities are not accessible by walking and cycling, are located on safe useable walking routes that are an appropriate distance to a suitable bus stop facility, served by appropriate public transport service(s) which connect to destinations containing the remaining key serves and facilities.

#### 5.45 *Walking/Cycling*

- 5.46 The proposal has two access points onto the B4060, which is a busy road used by all vehicles, including large lorries, travelling from Yate to Charfield, Wotton-under-Edge and the M5 motorway. The first is to be situated approx. 40m south of the junction of Sodbury Road and Amberley Way, whilst the second will be situated approx. 100m south of the junction of Sodbury Road and Frith Lane. At the location of a current field access. Both will take the form of simple priority junctions with footways providing pedestrian access into and out of the site.
- 5.47 The site is situated at the southern end of Wickwar village, thus the greatest demand from pedestrians and cyclists will be routes to and from the village centre. The most direct route is via Sodbury Road/High Street.
- 5.48 Sodbury Road as it passes the development features only a partial footway on the western side of the road of varying lengths, narrowing to approximately 1.0m for some sections. There is a higher quality footway provided on the eastern side of the road that connects through the new developments to the east of Wickwar. Both routes can be followed northbound towards the town centre, or in the case of the western side from just north of 'Country Style Supplies Wood Yard.
- 5.49 Section 106 funding has been made available from the 2 recent housing developments for improvements in Wickwar village. The scheme was designed to address issues raised in the past by the local Councillor, the Parish Council and residents. The scheme comprises several elements including:
- Zebra crossing north of Amberley Way;
  - Extended 20mph zone through the High Street/Station Road, between Inglestone Road and Chase Lane;
  - Series of speed tables on High Street/Station Road, between Inglestone Road and Chase Lane;
  - Pedestrian refuge on High Street in vicinity of the Youth Club;
  - Waiting restrictions on High Street between Inglestone Road and Back Lane;
  - Junction improvements at High Street/Back Lane, and High Street/Buthay Lane, to improve visibility; and
  - Footway build-outs at Station Road/The Downs/High Street, to provide safer crossings for pedestrians.

- 5.50 The scheme is designed to reduce vehicle speeds through Wickwar and to provide safe crossing points where existing footways end, such that pedestrians need to cross the road to take up their journey on the opposite side of the road. Additionally other improvements funded by the Poplar Lane and Horwood Lane developments delivered a new foot/cycleway between Firth Lane and 'The Fence Yard' on eastern side of Sodbury Road; Footway improvements between the Horwood Lane site and the village centre, including across the frontage of the Citroen dealership; a new bus stop and traffic calming measures on Sodbury Road.
- 5.51 The applicant acknowledges that there are limited cycle facilities provided by the immediate street network with cyclists expected to use the carriageway in places and certainly travelling south on the B4060. However, the provision of a new foot/cycleway along the frontage of both the Horwood Lane and Poplar Lane developments has provided some dedicated cycle space and the Avon Cycleway passes through Wickwar via The Downs and Station Road, linking Wickwar with Thornbury and Chipping Sodbury. Whilst the applicant considers that this gives a viable alternative to car travel, the route south to Chipping Sodbury and Yate is along busy roads making it unattractive to use. It is not considered that cycle routes out of Wickwar are safe or attractive for use by cyclists.
- 5.52 That said, distance from shopping and other facilities and lack of accessibility on foot or by bicycle were not reasons used to refuse the two recent housing developments opposite this site and the Highways Officer does not wish to pursue a reason for refusal based on travel sustainability, provided that a suitable bus service is provided (see Public Transport Section below).
- 5.53 *Public Transport*
- 5.54 There is a bus stop located on Sodbury Road found in the northeast corner of the site. The services (84 & 85) that did connect to Yate, Wotton-Under-Edge and Chipping Sodbury have recently ceased and been replaced with a more limited bus service operated by The Big Lemon Bus Company and Dynamic Demand Responsive Transport (DDRT), although this is in trial for 2 years only.
- 5.55 A new/improved bus service is being investigated by the applicant's consultants and they do not consider WECA's request £2.25 million (£450k per year for 5 years) towards bus services to be justified. WECA have stated that this was generated by a figure given to them by Stagecoach. The developer has agreed to pay a reasonable contribution towards bus services, but wishes to negotiate on the amount to ensure it is proportionate to their site.
- 5.56 It is important to the sustainability of the development that there is a reasonable bus service from Wickwar. The newly introduced DDRT can only be concluded as acceptable at this time. This is because its recent introduction means there is insufficient information to confirm its use and practicality; or comparison with the former services, which were not well

used. Although on a 2-year trial, this could be successful and lead to its continuation. This cannot be known at this time.

- 5.57 Given the choices of bus transport that is currently available, the Council is not in a position to be able to refuse this application on lack of bus service, particularly as the developer is prepared to give a contribution to a bus service in whatever form that might take. This would need to be the subject of discussions of any S106 agreement.
- 5.58 The closest railway station currently is Yate, which has services to Bristol, Gloucester and Worcester. Changing trains services at Bristol Parkway, a 9-minute journey, offers mainline services including Swindon, London and Birmingham. The DDRT service would provide transport to the train station.
- 5.59 Charfield Railway Station has recently been granted full planning permission to be reinstated (P22/05778/R3F) and will significantly enhance alternative modes transport to destinations such as Bristol and Gloucester from Charfield and the surrounding villages, in particular. Wickwar lies approx. 5km to the south of the proposed station. Whilst a bus does not currently directly run between Wickwar and Charfield, The Big Lemon Bus Company has a circular route that provides a service that links the surrounding villages, including those two villages. It is hoped that when the station opens (approx. 2025), that a more direct bus service can be provided.
- 5.60 Notwithstanding this, the distance is not prohibitive to cyclists and the station will provide a viable alternative transport means to employment and shopping centres etc.
- 5.61 In addition to The Big Lemon bus service, the newly initiated DDRT would provide a bus service that would link residents of Wickwar to the station when it opens or currently, other destinations for onward travel.
- 5.62 The current residents of Wickwar have limited public transport choices and it is considered that the residents of the proposed development would have similar or marginally better choices. Therefore, it is considered that a reason for refusal on the basis of unsustainable transport cannot be justified.
- 5.63 *Existing Local Facilities*
- 5.64 The village of Wickwar does not have a shop as the one located in the village centre closed in recent years. A convenience store is proposed as part of this application. The nearest retail centre is Yate which is approx. 7.5km away to the south. The nearest facilities are found on Wickwar High Street including the Fox and Maple Public House, Wickwar Coffee shop and Wickwar Social Club.
- 5.65 Alexander Hosea Primary School is located along the eastern edge of the village and is an approx.15-minute walk from the site. Whilst many of the local residents' objections indicate that the school is at capacity, the Education Officer has not raised an objection, but has asked for a

contribution for its expansion.

- 5.66 Wickwar playing fields lie approx. 10 minutes away to the north and provides a space for dog walking, sports and informal play.

5.67 *Proposed Retail Facilities*

- 5.68 The proposal includes provision for a shop of no more than 1000sqm on a 0.15ha parcel of land. However, this size is not the actual likely size proposed, but more a figure to ensure no Retail Impact Assessment is required. The applicant states that market interest has come from providers seeking a floor space of approx. 400sqm and they consider that a condition restricting floor space to under 500sqm to allow some flexibility would be acceptable.

- 5.69 The land for the shop is shown clearly on the indicative masterplan with an area for car parking etc. The position of the shop is at the southern part of the site, adjacent to the proposed southern access into the site and also adjacent to Sodbury Road. It will therefore serve passing traffic as well as local residents.

- 5.70 The shop is not well located for the majority of residents of Wickwar as it lies at what would be the southern limit of the built-up area. However, for such a shop to be attractive to commercial operators it requires a prominent visual presence and adequate car parking so that it captures sufficient trade. Its location will be close to the entrance into the village and with the cycle/footway on the opposite side of the road and a pedestrian crossing point just to the south. It would, therefore, be possible for local residents to access the facility either on foot or cycling.

- 5.71 It is accepted that the shop would provide only a top-up shop type of facility, with other shopping trips needing to be made to Yate etc. However, as a village, such a facility is considered to be an appropriate size to provide sufficiently for this need. Comments about the viability of the proposed shop are noted as are concerns that it will not be delivered once/if planning permission is granted. However, a similar site at Morton Way in Thornbury with 300 dwellings Bloor Homes delivered a 270sqm (net) retail unit and when the proposal and the development directly opposite is taken together the sizes are comparable. The developer has included a letter of developer interest, but this can only be given limited weight, because interest cannot be seen to equate to commitment. The shop would, of course, cater for the wider village.

- 5.72 The applicant has stated that they predict that the shop will provide 10 full time and 10 part time jobs.

- 5.73 Additionally, the applicant is willing to have delivery of the shop tied into the S106 in a way that will give more certainty about its delivery. They have already been in discussions with retail providers. The comments about the shop at Charfield currently being unoccupied are not considered to be

relevant. The circumstances surrounding its non-opening are not understood to be about its viability.

- 5.74 Subject to suitable wording in the S106 agreement for the size and delivery, it is considered that the shop, whilst not ideally located for easy access, is a positive benefit to the village for day-to-day shopping needs.
- 5.75 In terms of the location of the development and access to local facilities and sustainable means of transport to the wider area, the proposal is considered to be acceptable. The provision of the shop, if in fact delivered, is a factor in this conclusion as it provides for the day-to-day needs of the existing and proposed residents.
- 5.76 Heritage Matters
- 5.77 The Planning (Listed Buildings and Conservation Areas) Act 1990 provides powers for the designation, protection and enhancement of conservation areas and the preservation of listed buildings. The Act requires that special regard should be given to the desirability of preserving a listed building or its setting (s. 66) as well as giving special attention to preserving or enhancing the character or appearance of the conservation area (s.72).
- 5.78 Paragraph 195 of the NPPF requires local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by the proposal (including any development affecting the setting of a heritage asset). Paragraphs 201 and 202 require local authorities to assess whether there is substantial harm, less than substantial harm or no harm to the heritage asset. Core Policy CS9 requires, amongst other things, that new development must be conserve, respect and enhance historic assets. Policy PSP17 of the PSP expands this to include understanding of the heritage asset and the impact of the development together with assessment of the development which affects the conservation or enhancement of a heritage asset.
- 5.79 The identified Heritage Assets are :-
- The Wickwar Conservation Area.
  - Grade II\* Frith Farm.
  - Grade II South Farm.
- 5.80 The Conservation Officer has now agreed with the applicant that the proposals would not cause harm to the character of the Wickwar Conservation Area due to the distances involved between the application site and the historic core of the village.
- 5.81 With regard to the impact on Frith Farm, there is disagreement between the Council's Conservation Officer and the applicant's consultant. For Frith Farm the Heritage Consultant writes that whilst there may be views from Frith Farm on its eastern elevations, those views are incidental and not designed. The Heritage Assessment also notes that there is intervening landscaping which

would further screen views and the western edge of the development lends itself to further screen planting. The Council's Conservation Officer, however, cannot agree that despite the distance and intervening vegetation that the scheme would be "barely noticeable" as cited. He therefore disagrees with the Heritage consultant that the development proposals would not cause harm to the significance of Frith Farmhouse.

- 5.82 The proposed development would encroach into its setting, but the Conservation Officer concludes that the development would result in a change in setting, or more specifically a change in how the setting is perceived from Frith Farmhouse. In the light of other material considerations, while the change in setting would potentially be very limited, it would still be harmful.
- 5.83 In reviewing the amended proposal, taking further mitigation into account, the Conservation Officer concludes that less than substantial harm to the significance of the Grade II South Farm would occur at the lower end of the spectrum.
- 5.84 Whilst harm to the identified Heritage Assets has been attributed at the lower end of the less than substantial harm scale to both of the identified heritage assets, it is still incumbent on the decision maker to have regard to the importance of these assets and their irreplaceable nature and very great weight and importance must be given to their conservation. The harm to heritage assets would not accord with policy CS9 of the Core Strategy, but that policy makes no provision for the consideration of public benefits and in this respect is inconsistent with the Framework. The more recent policy in the PSP (PSP17) does include such a provision, but there is a requirement to demonstrate that there is no other way to deliver similar public benefits through the development of an alternative site. This approach is also inconsistent with the Framework. On this basis, very little weight can be given to the fact that the proposal is contrary to the identified existing local plan heritage policies.
- 5.85 Paragraph 202 of the NPPF must be applied where harm has been found and that great weight and importance must be given to the conservation of heritage assets. The public benefits of the scheme are listed within the Planning Balance section and need to be balanced against the harm caused to the heritage assets which attract great weight. This balancing exercise is undertaken at the end of this report.
- 5.86 The landscape officer identified that the revised masterplan allowed views towards the Grade 2\* listed Holy Trinity Church. The setting of this Grade 2\* listed structure was not analysed by either the applicant or the Council's Conservation Officer. However, the Council's Conservation Officer has confirmed that he does not consider that the site lies within the church's setting and thus no heritage harm can be identified to it. This is because of the separation distances involved and the intervening features between it and the application site which allow only limited or partial views of the church tower. Moreover, it was not considered that the application site forms part of any key views or possesses important sightlines to or from the church. The

application site merely forms part of its wider rural landscape in which in the conservation officer's view, the application site forms an incidental part of. Therefore, as per the definition of "setting" within the NPPF, in light of the limited views of the church from the application site, it was considered that the application site does not make any contribution to how the Grade II\* church is experienced and so consequently, the application site was not considered to form part of the setting of the church. Therefore the impact identified by the landscape officer is one of landscape impact only.

5.87 Historic England were consulted on the application, but did not comment in relation to the impact of the proposal on any of the Heritage Assets.

5.88 Ecology

5.89 Following the initial comments of the Council's Consultant Ecologist an Addendum to the Ecological Appraisal and Biodiversity Net Gain Calculations was submitted for review. The changes made to the Framework Masterplan which is pertinent to ecology are:

- Revision to SUDS strategy replacing a single basin with 3 basins distributed across the site.
- Inclusion of rain gardens, which provide further opportunities for biodiversity enhancement.
- Relocation of LEAP and LAP from green open space to within the development to allow creation of additional habitat for wildlife.
- Additional planting along northern boundary of the site, enhancing wildlife corridors for dispersal of protected/notable species across the site, whilst providing additional breeding and foraging habitat.
- Additional tree planting across the development including orchard trees providing additional habitat and foraging and breeding habitat.
- Provision of additional footpath routes/connections through the site which improves links to the wider PRoW network, providing additional benefits to recreation and visual amenity whilst seeking to reduce recreational pressures on statutory designated sites in the wider landscape.

5.90 It is noted that both Natural England and Gloucester Wildlife Trust have raised significant concerns about additional recreational pressures on the Lower Woods SSSI and Bishops Hill Woods SSSI. Following the additional information, Natural England withdrew their objection, but Gloucestershire Wildlife Trust maintained theirs on the basis of increased recreational pressure on the SSSI.

5.91 Notwithstanding the exceptional quality of the woodland which is the most extensive ancient woodland in the area formerly known as Avon and comprises a mosaic of different habitat types supporting 12 species of bat, and whilst a matter of judgment, it is not agreed that the addition of 180 homes at approx. 1km away would place such an undue pressure on the woodland that would warrant a refusal. There are a number of PRoW in the vicinity that are well used and do not enter the woodlands. The addition of a



more convenient link to established PRoW to the west of the development is considered to reduce this pressure further. This is something that the Council's Ecology Consultant agrees with.

- 5.92 However, given the sustained objection by Gloucestershire Wildlife Trust and acknowledgement that there may be some increased use of the SSSI, which may add to the existing problems, this is ascribed some weight in the balancing exercise at the end of this report.
- 5.93 Ecological enhancements, as reflected in the new BNG calculations, demonstrate a 35.14% Biodiversity Net Gain and with respect to hedgerows a 50.91% net gain. Both are well in excess of the mandatory 10% net gain that is to be introduced later this year and can be seen as a benefit of the proposal.
- 5.94 Climate Change
- 5.95 No updated Sustainable Energy Statement has been provided following the Climate Officer's original comments, but that officer has confirmed that a suitably worded condition about a revised Sustainable Energy Statement is an appropriate approach.
- 5.96 Public Open Space.
- 5.97 There is some discrepancy between the Masterplan (3002 RevM) and the Design and Access Statement (DAS) RevB which state 32,500sqm & 23,100 sqm of combined Informal Recreational Open Space (IROS) and Natural and Semi-Natural Open Space (N&SN) respectively. However, both exceed the minimum requirement. The POS Officer requires that an indicative plan showing the required amounts of POS is contained within the S106 Agreement. The applicant confirms that the figures quoted do not include the attenuation basins.
- 5.98 The POS officer has criticised the landscape strategy which shows mown grass informal paths, as these are not considered to be acceptable to provide all year-round access and are likely to erode over time. Paths through POS should be 1.5m wide as a minimum and finished with a sealed surface. Seating and bins should also be provided. The Drainage and Landscape Strategies indicate that in places, paths will be compromised by hedging and landscaping and this will need further consideration at the more detailed stage.
- 5.99 The POS officer has commented that *no outdoor sports facilities are proposed and no justification as to why off-site provision creates a more acceptable proposal than on-site. It is clear from the application documentation that although the current application is for 7.89ha, the applicant intends to apply for permission on 38ha in total. The current application is therefore only 20% of that land. I consider that they should be providing entirely for their own needs within this application or within their land.* The application is a stand-alone application and future plans for a larger

site cannot be taken into consideration with this application. The requirement is for 6,912 sqm and if provided off site, this equates to a sum of £402,796.11 with a £121,913.16 maintenance provision. The applicant is aware of these requirements. The payment for off-site facilities would be subject to a S106 agreement.

- 5.100 In terms of provision for children and young people, a Local Area of Play (LAP) in the region of 126 sqm is proposed. The Landscape Strategy shows access into the LAP from adoptable highway via a proposed footpath through POS. The LAP is located near to existing and proposed tree planting. There are likely to be issues with shade, root protection area constraints and potential effects of roots on surfacing, free space areas, etc. This will need to be carefully considered at the detailed design stage to eliminate these issues.
- 5.101 Following comments from the POS Officer, the location of the Local Equipped Area of Play (LEAP) has been amended and measures approx. 850sqm. Unfortunately, the LEAP as shown is likely to breach minimum separation distances from residential properties, but this can be designed out a Reserved Matters stage. Again there is likely to be issues with shade, root protection areas and free space areas etc. as both existing and proposed trees are shown in close proximity. The drainage plans currently show both foul and surface water drainage running through the LEAP, which is not acceptable, but can be overcome at the detailed design stage.
- 5.102 The Landscape Strategy gives the following details - "Play areas to be of natural character, incorporating wooden equipment and providing accessible doorstep play for residents". In order to count towards policy provision, the LAP and LEAP should be fully equipped and as inclusive as possible, catering for children with differing abilities. This would be the subject
- 5.103 The proposal includes 0.09ha of allotments, which should be laid out, levelled and top soiled, with appropriate facilities including secure robust storage for each plot and a water supply (not just water butts) within Murra max distance of 30m from each plot. The masterplan shows parking for 4 cars with a turning area and this would need to be reserved for allotment users and allotment users should be from the development as there is not a significant provision over the policy minimum. It is recommended that at least 2 plots are made smaller with access for people with disabilities, including wheelchair access. It is noted that the plots are close to a tree belt which may cause shading. It was noted that the site has high levels of zinc and it will be important to ensure that soil is suitable for growing of food for human consumption. This should be conditioned.
- 5.104 POS officer has made comment on the Surface Water Infrastructure (SWI) which is relevant in that much of it sits within POS areas where access for maintenance is essential. However, the concerns raised relate to detail and as this application is in outline, they can be covered in a Reserved Matters submission. The revised FRA shows 3 smaller basins and a swale which are designed to have range of depths between 1-1.5m with a maximum gradient of 1:3. Whilst the basins and swale dominate the POS and are not

considered by the POS Officer to be accessible, the amount of POS is satisfactory in planning terms and this cannot be used to justify a reason for refusal.

- 5.105 The POS areas will need management and maintenance and the applicant will need to clarify the intentions for this. If the applicant proposes private management of POS and surface water infrastructure the Council must be confident that the value of any service to the public is sustainable and does not create ambiguity in how people access those services should they have concerns or requests; it is important that the community receives a seamless service. Provisions to ensure suitable and secure in-perpetuity arrangements for operation, management and maintenance of all the public open spaces, ancillary open space and surface water infrastructure (SWI within POS that is not adoptable by a statutory undertaker) will need to be incorporated into the Section 106. The Council charges a fee (£63.96 per 100sq.m. plus £615.90 core service fee) to inspect the open spaces to ensure their compliance with the approved plans prior to transfer to the private management entity.
- 5.106 Should the developer wish the Council to take on management of the facilities, then developer contributions will be sought through the use of S106 planning obligations and Community Infrastructure Levy (CIL). South Gloucestershire Developer has a CIL and S106 SPD (March 2021) which sets out the requirements.
- 5.107 Drainage
- 5.108 *Surface Water* - Where a site lies within a range of flood zones and a Sequential Test as to the vulnerability to flooding must be considered so that more vulnerable uses are given priority for lower risk land. The application is supported by a Flood Risk Assessment which was updated within the life of the application.
- 5.109 The site lies outside any Source Protection zone and has been shown to be 'Soilscape 18', described as slowly permeable, seasonally wet, slightly acidic, but base-rich loam and clayey soils with impeded drainage. Further assessment and infiltration tests have concluded that the site is unsuitable for infiltration drainage. I.e. soakaways are not a suitable method of drainage.
- 5.110 The site is entirely within Flood Zone 1, the lowest classification of flood risk (risk of fluvial flooding is less than 1 in 1000 year or 0.1% probability in any year). There is a narrow band (approximately 4m) of Flood Zone 2 (FZ2) associated with the tributary of Ladden Brook, which is approximately 215m southwest of the site boundary. Whilst the development for residential purposes is in the classification of 'more vulnerable' development, in accordance with Paragraph 79 of the NPPF all forms of development are compatible.
- 5.111 Although the site is not identified as being within a high-risk zone for fluvial/tidal flooding, the NPPF states that the FRA should assess the increased risk posed by climate change over the projected life of the

development. The submitted FRA does this and has not been challenged by the Council's Drainage Engineers.

- 5.112 There is an un-named ordinary watercourse that flows from south to north along the western boundary of the site. No flood zone is shown on any Environment Agency (EA) maps, possibly because it has not been modelled. The floodplain that would be expected is approx. 6m and any development should be set back at least 6m to minimize the risk of flooding.
- 5.113 Overall, the Surface Water Drainage approach using swales and attenuation basins is considered to be acceptable.
- 5.114 With regard to *Groundwater Flooding*, this typically occurs following extended periods of rainfall causing water levels to rise above surface elevations from underlying rocks or springs. The Level-1 SFRA provides general assessment of groundwater flood risk in South Gloucestershire, but information is limited. A more reliable measure of groundwater flooding is whether there have been any events in the past – no mention is made of such events on the site. There is no objection on the grounds of Groundwater Flooding.
- 5.115 Foul Sewer – Wessex Water has confirmed that there are no public sewers on the site, but multiple public sewers run parallel to the B4060 adjacent to the eastern boundary. The drainage strategy proposes foul water drainage to be via a network of adoptable foul water sewers to an adoptable pumping station at the north-west of the site. This will subsequently pump foul water flows east to the nearest public foul sewer on Sodbury Road and is an acceptable strategy for Wessex Water, based on the fact that a gravity solution is not achievable due to the topography of the site.
- 5.116 The site has been demonstrated to be able to be delivered with adequate drainage and not to flood. Details will be required at Reserved Matters stage.
- 5.117 Highways (including National Highways)
- 5.118 National Highways raised an initial objection on the basis of the impact of the development on J14 of the M5. Their overall concern was that the proposed site is located approximately 6.3km from M5 J14. National Highways is aware that significant queuing occurs in this location that has been recorded extending back onto the M5 mainline at the M5 J14 northbound off-slip during the weekday AM Peak periods. They stated that it should be noted that without an adopted Local Plan speculative development is likely to further degrade the safe and efficient operation M5 J14 and the local road network in this location.
- 5.119 Following additional information, however, National Highways removed their objection, because it was demonstrated by the applicants that there is no impact on J14 of M5. They do, however, require a Construction Management Plan to be controlled by way of a planning condition.
- 5.120 Initially concerns were raised by the Highways Officer, similar to those consented schemes opposite the application site. Wickwar has limited

facilities, meaning that the majority of the needs for future residents will involve travel likely to be dominated by car based means and without significant improvement to the bus services, walking and cycling infrastructure, and ideally with other development coming forward in the future to help offer local facilities to contain travel movement. The initial submissions also lacked sufficient technical information in terms of highway impact appraisal and required further information on sustainable travel options and likely use.

- 5.121 Subsequently further information was submitted by the applicant to address these concerns. The applicant has not agreed to WECA's requirement for £450k per year for 5 years as a public transport subsidy (total £2.25 million), considering that there has not been a robust justification given for its level. They have, however, agreed to pay a contribution towards a bus service, the level of which would need to be negotiated.
- 5.122 The Travel Plan has not been amended in line with the Highway's Officer's comments, but it is considered that an updated Travel Plan could be secured by way of a planning condition.
- 5.123 Local transport policy used to help evaluate or determine the proximity of services and facilities in order to understand how walkable, or cyclable they are, is Policy PSP 11 of the Policy Sites and Places Local Plan (Adopted November 2017). Policy PSP11 is named as Transport Impact Management.
- 5.124 It is noted that in the Appellants Statement of Case (for the submitted non-determination appeal) this policy is referenced as "deemed to be out-of-date", and references the Planning Inspector's report [para 46] for the Land South of Badminton Road, Old Sodbury Appeal Decision APP/P0119/W/22/3303905. As a witness at that Inquiry, The Highways Officer does not recall any such conclusion or suggestion and cannot see the equivalent reasoning set out (as inferred in the decision reference to the "first main issue" of the Inspector's report). He does not accept the policy to be out of date and as there has to be an agreed methodology for assessing the proximity of facilities and the likelihood of walking or cycling, PSP11 seems the most appropriate measure for this.
- 5.125 In 2018 and 2020 SGC reviewed settlements through its Data and Access Profiles relating to the facilities access tables in PSP11 – It shows the facilities and services required to meet day-to-day needs and appropriate distances to encourage travel by cycling or walking. For Wickwar 8 facilities were found compared to 10 in 2018 and a match for 5 of the 15 facilities, whilst appreciating that there is an overlap of themes.
- 5.126 The submitted Transport Assessment shows only community centres and the primary school to be within PSP11 appropriate distances, although the employment areas at Old Cider Mill and Arnolds Fields Trading Estates are within PSP distances thus making 3 out of the 16 elements satisfactory.
- 5.127

**Table of Facilities in Wickwar, measured from centre of the village**

Facility	Walking & Cycling Distance	Number within Catchment 2020	Number within Catchment 2018
Dedicated Community Centre	800m	3	3
Library		0	0
Post Office		0	1
Public House		1	1
GP Surgery		0	0
Pharmacy		0	0
Dentists		0	0
Comparison Retail Store <sup>1</sup>	1,200m	1	1
Designated Town Centre		0	0
Superstore		0	0
Convenience Store <sup>2</sup>		0	1
Employment – Town Centre	2,000m	0	0
Major Employers		0	0
Safeguarded Employment Areas		2	2
Primary School	2 miles	1	1
Secondary School	3 miles	0	0
<b>Sub Total</b>		<b>8</b>	<b>10</b>
<b>Superfast Broadband</b>	n/a	Yes	Yes
<b>Train Station/ Service</b>	2,000m	0	0

Notes: 1 - Comparison Retail Store is a shop selling goods and service other than food e.g. hairdresser or garage; 2 - Convenience Store is smaller shop selling everyday basic food and drink items e.g. bread, milk

- 5.128 The development does, however, propose a shop, albeit at the southern part of the village and furthest away from the greatest majority of the dwellings in the village. Although the size of the shop is described differently in different documents, the applicant has now confirmed that it is likely to be circa 400sqm, with land with adequate parking etc. The addition of a shop for the village would be a benefit and would help to reduce some car borne trips for top-up shopping etc. However, the applicant has not provided any documentation to give the Council certainty that it will be delivered as a viable option (the submitted letter of interest does not give this) and its inclusion must therefore be approached with an element of caution and given limited weight in the decision-making process.
- 5.129 Whilst the shop cannot be conditioned, the provision of the land, serviced, and the possibly building shell can give some comfort about its delivery, although this cannot be guaranteed.
- 5.130 At the request of the Highways Officer, the applicants carried out an assessment of the surrounding walking infrastructure through a WCHAR (Walking, Cycling and Horse-riding Assessment) as part of assessing a safe walking route to school. No cycling opportunities were noted, other than identifying those already included as part of the recent developments on the east side of Sodbury Road, and no horse-riding opportunities were identified.

- 5.131 The off-site mitigation proposals shown on Drawing 7909-SK04 Rev1 do not show any footway widening. Footways in Wickwar vary considerably and the proposed routes to school would exit the northern access to the site and continue northwards to Amberley Way. Route 1 then crosses the road via the existing uncontrolled island with dropped kerbs to continue along Amberley Way. Route 2 continues along Sodbury Road, past the Citroen garage to cross the road to the pedestrian route leading to the Amberley Way spur, and the third route continues further on the main B4060 to cross at Inglestone Road. Neither route 2 or 3 have pedestrian crossing infrastructure of the B4060 so Route 1 would be the preferred route, and that is where the wayfinding information would direct.
- 5.132 The bus services that the applicant originally relied upon for public transport (Services 84 & 85) stopped June 1<sup>st</sup> 2023. Although those services were used by the applicants in their accessibility by sustainable modes assessment, their removal and replacement with The Big Lemon bus service and DDRT means that the applicant's data is out of date and of little value now.
- 5.133 The appellants are proposing a zebra crossing of the B4060 at its southern entrance; and a southbound bus stop where the zebra crossing leads to. This infrastructure would be helpful, however it also requires a bus service of appropriate scale and frequency to offer a realistic alternative to serve the development, as discussed in this report.
- 5.134 Paragraph 5.25 from Policy PSP 11 of the Local Plan states:
- 5.135 *"5.25 The larger the development proposal and, or the larger the reliance on public transport to access key facilities and services, the more frequent and extensive a bus service will be required, in order to avoid a reliance on private car journeys."*
- 5.136 Dynamic Demand Responsive Transport (DDRT) has recently been introduced in the area instead of the previous supported services, but its operational performance and reliability from a users' perspective will need to be assessed. The DDRT cannot be proven to be a replacement or betterment to the 84/85 service, which in itself was infrequent, but it is an alternative.
- 5.137 The Big Lemon Bus Company service is not a frequent service, but does provide a level of bus service to Wickwar and the surrounding villages.
- 5.138 Notwithstanding this, however, the development's location and distance from the majority of facilities is likely to mean the car will be the travel mode of choice from this development without further improvement to sustainable travel infrastructure and services. This is however, the current situation for residents of Wickwar and given the bus service and DDRT, the level of public transport is unlikely to currently offer a worse service than previously and it may even be marginally better.

- 5.139 WECA have requested a bus service subsidy of £450,000 per annum for five years from this development, and Highways support the requirement for an improved bus service as part of this development. Whilst the figure is not agreed, the Applicant has agreed to pay a reasonable contribution towards a bus service.
- 5.140 An appropriately frequent bus service, including evenings and weekends to facilities in Yate would offer an alternative to car-based travel for future residents. The introduction of DDRT and the bus service offered by The Big Lemon Bus Company (which could be further improved with the S106 contributions) would facilitate such an alternative and ensure that an alternative to the private car is available. The success of both bus services is currently not available, because of their newness and thus lack of data, but their existence gives an alternative that carries weight in the determination of this application.
- 5.141 Walking and cycling in Wickwar offer limited options in this location because of the lack of facilities and the distances to be travelled to access any alternatives. Wickwar has areas of poor pedestrian infrastructure, with narrow footways or missing sections and few road crossing points. There is no cycling infrastructure other than the dedicated cycle way on the opposite side of the road built as part of the new residential developments.
- 5.142 Unless bus services are improved as set out above, the likelihood is that cars will be the preferred mode of choice for residents in and visitors to the new development, conflicting with Policy CS8 of the Core Strategy and PSP11 of the PSP Plan. However, 'car dominated' development is not defined and comes down to judgement. However, it is most likely that where travel is needed, cars will be used unless bus services are provided and unless the travel plan is proactively engaged.
- 5.143 The Highways Officer raised these concerns when the two residential schemes opposite were granted under applications PK16/4006/O & PK17/4552/O. However, planning permission was not withheld and in fact no contributions were made to the local bus service, instead an acceptance that the development would rely on car-based travel, which was weighed as a harm in the planning balance of those permissions. The proposed situation is broadly similar in terms of public transport provision (the 84/85 bus service was operational at the time of the grants of those schemes).
- 5.144 Subject to payment secured by any S106 agreement to help fund bus service to Wickwar, it is considered that overall the sustainability from a transport point of view will be no worse than the current situation. This is agreed with the Highways Officer.
- 5.145 Landscape
- 5.146 The revised plans submitted by the applicant have not overcome the Landscape Officer's objections which centre on the site being over developed



in this part of the landscape with the development form not being appropriate, adding to the magnitude of the landscape and visual impact, rather than mitigating it. The comments of the Landscape Officer are available in full online.

- 5.147 The site is formed from 5 fields off the west side of the B4060 Sodbury Road at the southern end of Wickwar, which wrap around the rear of 64-86 Sodbury Road. The site directly fronts onto the B4060 to the south of South Farm, with a broader frontage to the south of 86. Field hedgerows (predominantly hawthorn) with scattered mature trees largely bound and sub-divide the site, except for part of the western boundary of the southern site area. . Group TPO113 contains willow trees along the NE of the site, which contribute to the distinct character to that part of the road.
- 5.148 The site and village lie between the Wickwar Ridge to the west of the site and the Churchill Ridge to the east. Both are considered to be Visually Important Hillside under SGC Policy CS2 (Green Infrastructure). There are a number of public footpaths which cross the fields to the west and south of the site.
- 5.149 It is noted that the houses will generally be laid out in 3 outward facing perimeter blocks, with built form up to 2.5 storeys. Open space will be located within the northeast margin of the site to give land for allotments, with the western margin of the site (ranging from approx. 30m in width to 45m) divided into 3 drainage basins, with the northern section as POS. There are 2 'green fingers' west to east where the LEAP and LAP are to be sited with a swale also incorporated into the southern one. Rain gardens are now proposed within the development on the main street.
- 5.150 The site was the subject of a Screening Opinion wherein the Landscape Officer requested that viewpoints were agreed prior to the application submission. This was not done. A LVA Addendum (Dated February 2023) was submitted and includes an additional 3 assessment viewpoints of the site, although not the 6 originally requested, which potentially would show more visibility of the site from some PROWs than is portrayed in the analysis.
- 5.151 From Firth Lane, where a field gate offers views across the site, the Grade II\* listed Church of The Holy Trinity, within the Conservation Area is clearly seen on the skyline to the left of Grade II listed South Farm. There is also a clear view of the church possible from 1 Firth Lane as well as other potential vantage points when there are no leaves on the trees. The proposed development will impact on views both towards and from listed buildings. The revised layout allows better views of the Grade II\* listed Holy Trinity church from within the site in 2 locations. However, they appear to conflict with both the proposed built footprint and tree planting locations on the plan, rather than being comfortably framed by such features.
- 5.152 There are open and panoramic views from Sodbury Road across the southern part of the site, that give the observer an appreciation of the wider landscape setting of Wickwar and its character. The development proposals,

as set out in the illustrative masterplan would remove these. Although the recent, eastern housing development along the B4060 intrudes into the character of this rural approach into Wickwar, this is currently partially balanced by the open, undeveloped land within the site along the southern boundary which gives a reasonable transition between the rural approach and the built development. The housing in the south-eastern corner of the site will combine with the housing being developed opposite to create an enclosed built corridor on either side of the approach road.

- 5.153 The revised masterplan shows better links between the residential parcels and a connection with the diverted footpath that will potentially run through the north of the site to link to the PRow to the northwest. The landscape strategy plan (EDP 6190-d026 Rev. A) shows them as mown grass which is not acceptable for all year-round usage. Whilst it is desirable that these issues are dealt with at the outline stage, the layout and surfacing of the paths can be dealt with at Reserved Matters stage. It is important to have raised it now, however, so that the applicants are aware of the main issues that need to be addressed.
- 5.154 The Landscape Officer is still of the opinion that the Framework Masterplan and Landscape Strategy, as presented, still show the central and southern parcels with a 'hard and uniform' western and southern development edge, with little articulation or mitigation within the POS zone (except for its junction of the East-West greenway), which will adversely impact views from the public footpath and lane network lying to the NW, W and S of the site. This hard edge is particularly prevalent on the southern boundary where the masterplan shows a shared access road along the boundary with no meaningful space to plant any landscaping. The western edge is softer in its approach because of the off set of POS. However, the amount of meaningful planting that could be undertaken to integrate the built development into the rural landscape is significantly compromised by the placement of the 3 SUDS basins, which also limit the character and recreational usage of the western POS area to the northern and western peripheries of the site, a matter that was raised by the Design Panel.
- 5.155 The 'green edge' zones on Figure 29 of the DAS, described on p. 78, and illustrated on Figure 30 appear to be mostly built form with some frontage onto shared streets and drives (Ref. Figure 24), and little opportunity for any meaningful structural planting or transitional built/green edge treatment. In contrast, the proposed layout accommodates orchard tree planting adjacent to the western edge of the northern parcel, which is welcomed.
- 5.156 Framework Masterplan -3001 Rev. M indicates some additional tree planting along the spine road including a rain garden within the central development parcel. The space currently allowed for street trees along the primary access road appears constrained by the proximity of building elevations and drainage routes. However, an appropriate quantum of tall, broad growing trees (12m plus height), with space to mature to full height and spread, would be required across the whole site so that these are seen above and between the new roof tops, to provide appropriate screening in views, and form new

structural/focal landscape features. These latter elements could be incorporated into a Reserved Matters application, although it is understood how desirable it would be to establish these parameters at this stage as would a framework LEMP.

- 5.157 The Landscape Officer concludes that from a landscape perspective, the proposed development is not acceptable in its current form given its encroachment into the countryside west of Wickwar, which is not in keeping with the established settlement form along the west side of the B4060. Development of the whole site will result in a noticeable south westerly projection to the built village footprint, which will have a significant adverse impact on the rural character of its westerly landscape setting.
- 5.158 In conclusion, there is a landscape objection to the proposed development which is considered to be damaging to the inherent character of the area, to limit attractive open views out to the countryside and provide a poor landscape setting to the southern entrance of the village.
- 5.159 Whilst it is acknowledged that the landscape in this area has no special designation (it is not in the Cotswold National Landscape / AONB), it is agreed that it forms a very pleasant rural setting to the village of Wickwar and it is also agreed that the indicative layout in the Masterplan severely disrupts this.
- 5.160 It is accepted that the form and layout shown in the illustrative masterplan would result in harm to the landscape setting of the village and views out to the wider countryside and from the network of surrounding footpaths would be considerably compromised. From the submitted masterplan it would not be possible to design a scheme that would protect these views or incorporate the design features that the Landscape Officer seeks. This is in conflict with policies CS1, CS2 & CS9.
- 5.161 Policy PSP2 of the PSP Plan states that where proposal 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 minimized and mitigated through the form of the development and where reasonable the provision of landscape enhancements.
- 5.162 The benefits of the scheme are set out later in the report. Whilst the design of the scheme for Reserved Matters applications, the masterplan indicates the layout that is being sought and for the reasons stated above, this is considered to be unacceptable and cause significant harm. The objections raised by the Landscape Officer are given significant weight in the Planning Balance exercise at the end of this report.

5.163 Urban Design

- 5.164 The Urban Design Officer has raised concerns about the realistic prospect of delivery of the shop based on the information that has been provided. However, discussions with the applicant have confirmed that there is some commercial interest (see retail section above) and they are accepting of having the provision tied in some way into a legal agreement. This cannot be definitive, because ultimately it will be market forces that decide, but it can secure their commitment to providing the land, serviced and potentially the shell of the building.
- 5.165 The Design and Access Statement (DAS), which sets out the guiding principles for the development and has been amended from the original document submitted. The applicants have requested that the DAS is approved via condition, but the Urban Design Officer maintains significant concerns about it and has given detailed comments stating why it should not be included. The applicants have chosen not to incorporate those changes into an updated DAS. This does not generate a reason for refusal in that there is no requirement to include a DAS as a condition.
- 5.166 The comments of the Urban Design Officer are clear on discrepancies of approach and any subsequent reserved matters application (notwithstanding the recommendation) would need to address those concerns in their submission. The comments are available in full online but centre around how the character of Wickwar has been assessed and incorporated and into the DAS.
- 5.167 Additionally, the Urban Designer considers that more apartments need to be included, not to increase numbers, although this would help with the potential setting to the development (see landscape section). There needs to be a wider choice of homes, not just 3 & 4 bed houses. Policy CS17 states that there is a need to provide smaller family homes in order to enable new households to get on the housing ladder and for older households to downsize.
- 5.168 The National Design Guide at Page 25 makes reference to separating cyclists and pedestrians from vehicular traffic. There is also other guidance that suggest that where segregation of such uses doesn't happen, people are less likely to choose to walk or cycle.
- 5.169 There is criticism of the shared space which should be an integral and parallel process to design of the residential layout with the objective of creating very low speed traffic (less than 10mph) in an interesting and safe public realm incorporating space for occasional substantial street trees or a cluster of trees.
- 5.170 More detailed advice contained in the Urban Designer's consultation response which is available online. However, much of the advice, although not contained in the current DAS, which is supposed to set out the guiding principles, is a matter for the Reserved Matters application(s). The applicants wish the DAS to form part of any permission, but this is not a requirement.

This is a matter acknowledged by the Urban Design Officer, who does not wish to put forward a reason for refusal on this basis.

- 5.171 Overall, the Urban Designer's comments on the unsustainable location are noted but fall principally within the remit of the Highways Officer. The concerns raised in relation to the potential for the scheme to be another standard housing scheme are also noted but considered to be totally controllable under the Reserved Matters application(s). It is not considered, given the ability to be able to control the details that are not satisfactorily dealt with in the DAS within any Reserved Matters application(s), that a refusal reason based on design can be substantiated.

5.172 Community Facilities

- 5.173 An application for 180 dwellings would generate a population increase of approx. 432 residents, giving a significant demand for community and cultural facilities at Wickwar. Therefore, enhancements to existing facilities are required to provide for a wide range of activities for different age groups.

- 5.174 In line with adopted policy, it is reasonable for people to have access to community and cultural space within 800m straight line distance of where they live (easy walking distance). Libraries provide a valuable local service and a gateway to knowledge and culture. The nearest South Gloucestershire library is in Chipping Sodbury and is a community-run library offering limited but important library services. The nearest libraries which offer a full range of library services are at Yate and Thornbury. A contribution of £49, 979.59 (index linked) is required (based on 12.96sqm @ £3,856.45 per sq metre. Additionally, a contribution of £3,564.00 is required to provide stock. These monies would go to local libraries and be secured via any S106 agreement.

- 5.175 The Dedicated Community Centre (DDC) Facilities in Wickwar consists of the Olive Pollard Memorial Room and main hall (shared with Alexander Hosea Primary School), which is available for hire and currently is used for out of school club, a pre-school, keep fit and Zumba classes. The venue also provides for various fund-raising events and private hire.

- 5.176 The Community Infrastructure Officer has requested that the applicant demonstrates that there will be sufficient and good access to existing community facilities within Wickwar or engage with operators to understand what additional facilities are required. If there is insufficient capacity within the existing facilities to meet additional demand, enhancement will be required at 60.48sqm of DCC with funding secured via S106. This will amount to £296,234.67 (index linked) (based on 60.48sqm @ £4,898.06 per square metre), for improvements/extensions to facilities to be agreed at a later date.

- 5.177 The applicant has agreed to pay these amounts.

5.178 Environmental Protection

- 5.179 *Noise* - Whilst the EP Officer did not object to the application following a

review of the noise report submitted with the application, it was noted that some mitigation would be required in some parts of the development to address road traffic noise and nearby industrial noise from the existing farming and dairy activity. These issues can be resolved at Reserved Matters stage and a detailed CEMP and noise strategy could be controlled by way of condition.

5.180 *Contamination* – The Ground Investigation Report submitted with the application did not identify any risks to human health or ground water, but did identify elevated zinc levels, but did not identify any impact on vegetation. Whilst the EP Officer recommended that the Landscape Architect comment on this with regard to plant growth, this is outside their area of specialism. The levels of zinc could be most impactful at the allotments and it is proposed that this is covered by a suitably worded condition to ensure that the soil is appropriate for growing human food.

5.181 Whilst basic radon protection is required, based on the findings, no ground remediation is necessary.

5.182 Lighting Engineer

5.183 No details have been provided for street lighting, although this is something to be covered at RM stage. However, the lighting engineer stresses that the planting, positioning and species selection of trees and other vegetation needs to be wholly considerate of the lighting strategy to ensure correct levels of lighting are delivered from the outset of the development and maintained throughout its life, without having to remove or compromise planting. The more obstructions placed in the path of the light distribution e.g. trees placed in the vicinity of street lighting, the more lights required to meet the BS; clearly this is not conducive to low carbon or energy efficient objectives and will have a considerable impact on capital investment and future maintenance costs. Lighting design and tree positioning cannot be done in isolation. A suitably worded condition could be applied to ensure that plans detail services, drainage and street trees etc.

5.184 Education

5.185 Policy CS6 of the Core Strategy seeks to secure contributions towards the provision of necessary infrastructure support for the development of sustainable and healthy communities.

5.186 The adopted South Gloucestershire Council Community Infrastructure Levy (CIL) and Section 106 Planning Obligations Guide SPD adopted March 2021 sets out how funding for education, community and health facilities can be secured through S106 legal agreements.

5.187 The Education Officer has sent updated comments and requirements because in the passage of time, the requirement for secondary school places has been introduced, raising the requirement from approx. £1.5 million to approx. £2.45 million. Additional accommodation is required at an existing

secondary school within 3 miles of the development because of increased admission numbers. Transport to either Brimsham Green or Chipping Sodbury School will also be required. This is an unexpected cost for the developer, after the initial consultation response. The agreed contributions would be added to the S106 agreement for any permission.

5.188 Self-Build

The Self-Build Officer has raised concerns with the application on the basis of lack of information. The application is accompanied by a Self-Build Delivery Statement which is incomplete. The submitted statement conveys a lack of consideration for the custom and self-build plot provision and does not follow the structure of the Delivery Statement set out by the Council in the Local Planning Application Requirements list.

The location of serviced self-build plots and phasing (including a phasing plan) is desirable to be agreed during the determination of the outline planning application but can be dealt with by planning condition and wording in any S106 agreement.

Self-build and custom housebuilding is sought in line with national Planning Policy Guidance: Planning Obligations and other requirements under Policy PSP42 of the Council's adopted Policies Sites and Places Plan (PSP). 9 Self-Build plots are required if 180 dwellings are constructed. Whilst the lack of information is disappointing, the developer is not resisting building self-build plots and it is considered that clauses in a S106 agreement about delivery and phasing together with conditions would sufficiently secure the required amount in an appropriate location.

5.189 Archaeology

- 5.190 The Council's Archaeologist raised some concerns about the level of investigation to assess the presence of archaeological remains. The requested field investigations in the form of geophysical surveys have been submitted and the Council's Archaeologist is satisfied with their conclusions and recommends only conditions to any permission.

5.191 Affordable Housing

- 5.192 The Council has recently updated its mix requirement for affordable housing, which has been forwarded to the developer. The requirements for the provision of affordable housing are standard in any S106 agreement and essential for the correct delivery of the scheme to be in compliance with policies CS18 of SG CS and PSP37 of the PSP as well as the Affordable Housing/Extra Care SPD.
- 5.193 As such the following are necessary to be included in the S106 - 35% of homes to be affordable at nil public subsidy with: -
- 72% of those (i.e. 45 units) as Social Rent
  - 28% Affordable Home ownership (Shared Ownership) i.e. 18 units.

5.194 The type, minimum size, design criteria and phasing/delivery criteria as set out in the Housing Enabling Officers report online can be contained within a S106 agreement. If the proposals were deemed acceptable, Affordable Housing would be sought in line with National Planning Policy Guidance: Planning Obligations and other requirements under policy CS18 of the Council's adopted Core Strategy Development Plan Document.

5.195 Crime Prevention

5.196 Crime prevention is difficult to assess at the outline stage, but it is noted that access is being sought at this stage. Amendments were made to the Masterplan and DAS following initial comments by the Designing Out Crime Officer and are now considered to be acceptable. The security measures proposed will be scrutinized at RM stage.

5.197 Trees

5.198 The proposal will involve the removal of 2 willow trees protected by a TPO as part of a group, at the northern end of the proposed development where one of the access points is to be located. The Council's Tree Officer was resistant to this as it does not accord with policies CS1 and PSP1. However, the officer acknowledges that if the trees are removed because of the access, this can be suitably compensated for by 'significant mitigated planting' to ensure increased canopy cover, alongside any proposed landscaping.

5.199 Should permission be granted, then the Tree Officer requests conditions and approval of the Stage 1 and 2 Arboricultural Impact Assessment Report.

5.200 Loss of Agricultural Land.

5.201 Section 15 of the NPPF at paragraph 174 states that planning decisions should contribute to and enhance the local environment by protecting and enhancing valued landscapes and recognise the intrinsic character and beauty of the countryside as well as protecting the best and most versatile agricultural land. The proposal is on grazing agricultural land outside the settlement boundary. The land has no special landscape or ecological designation and lies within an area that is Grade 3 (Good to Moderate) and thus there is no additional protection for the land afforded by the NPPF. Policy CS9 (9) seeks to protect the most versatile land for food production, but at Grade 3, the land is not within this category and a reason for refusal on this basis cannot be sustained.

5.202 Comments on Local Residents' Objections not already covered.

5.203 The main issues raised can be summarized as follows:

- In countryside/not in local plan/speculative.
- Traffic impacts.
- Impact on wildlife/biodiversity/landscape
- Lack of facilities and infrastructure



- Lack of school places.
- Overdevelopment of the village.

- 5.204 It is considered that these are covered satisfactorily within the report or are controllable by way of the conditions and S106 suggested.
- 5.205 The amount and strength of local objection to the proposal is noted and has been given due consideration. Some issues raised are not directly planning matters and cannot be taken into consideration in the determination of the application.
- 5.206 The comments relating to traffic within the village at the traffic lights has been addressed by updated information from the applicant, which states that the signals are operated by vehicle actuation rather than MOVA. MOVA (Microprocessor Optimised Vehicle Actuation). The forecasting submitted by the developer, with the proposed development added, will add to queues and delays at peak times. However, in order for a reason for refusal on this cumulative impact to be justified, as set out in Paragraph 111 of the NPPF, there would have to be a severe cumulative impact on the local road network. The Highways Officer does not agree that such a cumulative impact would occur and thus no reason for refusal can be substantiated.
- 5.207 However, the developer has asked if the introduction of MOVA (Microprocessor Optimised Vehicle Actuation) would be of benefit and contributions towards the signals' upgrade could be sought within any S106. This is something the Highways Officer supports.
- 5.208 The lack of a doctors' surgery, dentist etc. is outside the control of the Council in this situation. The NHS were consulted on the application but have not commented. There is a general move to centralise services in the NHS.
- 5.209 Wickwar is not the subject of an Air Quality Management Area (AQMA). Policy PSP21 states that *....development that, on its own or cumulatively, has the potential for significant emissions to the detriment of air quality, particularly in or adjacent to air quality management areas, will be acceptable where potential adverse effects are mitigated to an acceptable level, by an appropriate scheme of mitigation....*
- 5.210 Air Quality was considered in the EIA Screening Report submitted in Oct 2021 (ref. P21/030/SCR) which identified the relevant AQMAs (none that are near to the application site), levels of pollutants at nearby monitoring stations, and likely impacts associated with the proposed development (in isolation and in combination with other relevant projects). Overall, no significant effects were identified in respect of Air Quality. This conclusion was confirmed in the Council's Screening decision (matrix) which confirmed that the scale and nature of the development and the location of the site would mean that construction impacts are likely to be localised and relatively short term, and that there would be no significant operational effects (and that these would reduce over time). Construction impacts would be mitigated by way of a Construction Environmental Management Plan (CEMP), secured via

standard conditions.

- 5.211 The guidance referenced below states (at 6.8 in respect of identifying the need for assessment) that “It is reasonable to expect that an assessment will be required where there is the risk of a significant air quality effect, either from a new development causing an air quality impact or creating exposure to high concentrations of pollutants for new residents”. It also confirms that professional judgement will be required to determine whether an air quality assessment is necessary. It is not considered that an Air Quality Assessment is necessary here as there are no risks of significant air quality effects.
- 5.212 The matters relating to oversize vehicles using Wickwar High Street are noted. Contravention of regulations is a police matter, but in terms of access to this site for construction, this will be the subject of a construction management plan, which will cover such things as routes to the site and timings of delivery vehicles.
- 5.213 **CIL and Developer Contributions**
- 5.214 The application is also CIL liable; which is the mechanism adopted by South Gloucestershire Council to determine the level of contributions for community infrastructure; including but not limited to off-site community space, health, policing, and education services resulting from the development, the CIL charge levied for the application is outside the remit of members for consideration. All other planning obligations have been carefully considered to ensure they meet the tests for S106 obligations
- 5.215 **Consideration of likely impact on Equalities**  
The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society; it sets out the different ways in which it is unlawful to treat someone. As a result of this Act the public sector equality duty came into force. Among other things those subject to the equality duty must have due regard to: eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not. The general equality duty therefore requires organisations to consider how they could positively contribute to the advancement of equality and good relations. It requires equality considerations to be reflected into the design of policies and the delivery of services.
- 5.216 With regards to the above this planning application it is considered to have a neutral impact on equality.
- 5.217 **Decision Making**
- 5.218 As set out earlier in the report, the local plan policies that are most important for determining housing applications are considered to be out of date.

5.219 In such circumstances, paragraph 11d) in the NPPF is engaged. Paragraph 11 of the NPPF (Framework) states for plans and decisions there should be a presumption in favour of sustainable development. For decision makers para 11c and 11d applies:

*c) approving development proposals that accord with an up-to-date development plan without delay;*

*d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (Green Belt, AONB etc. in footnote 6);*

*or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

#### 5.220 Heritage Balance

5.221 The harm to the Heritage Assets of South Farm and Frith Farm has been considered in the heritage section above. Frith Farm is a Grade 2\* listed building, which means it has special interest and every effort should be made to preserve it. The proposal does not affect its structure in any way, being over 400m away, but the Council's Conservation Officer, contrary to the submitted heritage assessment, concludes that there is some harm to its setting. He has attributed this as less than substantial harm at the lower end of the scale.

5.222 South Farm is a Grade 2 listed building set approximately 40m north of the site. Again, the proposal is considered to affect the listed building's setting. However, given the uses and surrounding development the Council's Conservation Officer has attributed less than substantial harm, again towards the lower end of the spectrum.

5.223 The benefits of the proposal are:

- Provision of housing
- Provision of affordable housing
- Provision of Custom Build plots
- BNG in excess of the soon to be mandatory requirement of 10%;
- Potentially a shop which will serve the whole community;
- Crossing points over the B4060;
- A gateway feature to the village;
- Redirected PRow which will improve the route and create better connections to the wider network and countryside beyond;
- Creation of new jobs.

- 5.224 Great weight needs to be given to the harm caused to the setting of the listed buildings albeit the harm is limited. It is considered that when this harm is balanced against the benefits of the scheme as required under paragraph 202 of the NPPF the benefits outweigh the harm to both South Farm and Frith Farm. Therefore the harm to heritage does not on its own provide a clear reason for refusing permission.
- 5.225 Footnote 8 to para 11 states that policies are out of date where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. This is not the case with this application, but the Settlement Strategy policies have been found to be out-of-date.
- 5.226 Therefore, in accordance with the NPPF, paragraph 11d ii) is engaged and planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole. This therefore requires the decision maker to undertake a balancing exercise as to the benefits and adverse impacts of the scheme to reach a decision as to whether permission should be granted.
- 5.227 Planning Balance
- 5.228 In line with how the Inspector at LWoPF appeal attributed weight within their decision benefits/adverse impacts are given to weight under the following levels : *Limited, moderate, significant and substantial ( save in respect of Heritage, where great weight is attributed to the harm to be in compliance with the NPPF)*
- 5.229 *Harms caused by the application –*
- 5.230 The most important policies in the determination of this application are policies CS5, CS9, CS34 and PSP17 and in the recent appeal at Land to the West of Park Farm (LWoPF) these policies were not considered to be consistent with national policy in the NPPF and are therefore considered to be out-of-date. Policies CS1, CS2 and PSP2 are, however, still considered to be relevant.
- 5.231 Even without a Settlement Strategy the Council considers that it has a 5.35-Year Housing Land Supply. Although at the LWoPF appeal (the most recent appeal decision where the 5 YHLS was addressed), the Inspector only accepted 4.77 years, she stated that it was a figure in a ‘snapshot of time’. There have been a number of recent decisions which will boost supply and the figure of 5.35 years has been generated using the Standard Housing Methodology to create the housing requirement and accepted data collection methods have been used to create the housing trajectory figures.

- 5.232 There is a clear landscape harm, as set out in the landscape section above and it is considered that the magnitude of this harm means that it should be given significant weight.
- 5.233 The site is likely to add to journeys made by private car, considering the level of public transport, and will be largely car dependent and this should be given moderate weight.
- 5.234 The application would conflict with the spatial strategy as it involves development on a greenfield site outside any currently identified settlement boundary, but because the policies are demonstrated to be out of date, this conflict is given limited weight.
- 5.235 The loss of 7.89 hectares of Grade 3 agricultural land would be harmful but is small in quantity and has limited potential for food production. The loss of the land from agriculture has limited weight.
- 5.236 The effect of increased recreational pressure on Lower Woods SSSI is considered to be minor and is thus given limited weight.
- 5.237 Less than substantial harm is caused to both South Farm and Frith Farm, this is at the lower end of the scale nevertheless, this harm is a matter of great weight and importance and falls on the negative side of the planning balance.
- 5.238 *Benefits of the application –*
- 5.239 The developer is a well-known national housebuilder and, despite the economic climate, is likely to deliver some of these houses within 5 years and the ongoing delivery would therefore make a contribution to the Council's ongoing need to provide a 5 Year HLS, which should be given weight. The LWoPF Inspector considered that future contributions to the supply was particularly relevant as it is unlikely that a plan-led solution to housing delivery will be in place for several more years. Significant weight should therefore be attributed to the proposed housing delivery.
- 5.240 The developer has accepted the provision of 35% of units being provided as affordable homes. In 2021 the *West of England Local Housing Needs Assessment* (LHNA) was published as part of the evidence base to the draft *Spatial Development Strategy*. Although it has not been scrutinised through public examination it is the most up-to-date information available. This finds that in the period between 2020 and 2035 there will be a need for about 411 affordable homes per annum and 370 over a longer timeline between 2020 and 2040. Whilst the Inspector in the LWoPF Inquiry considered that there would be a considerable shortfall in affordable housing provision and therefore the provision of up to 63 affordable units on that site would make a valuable contribution to the supply, Housing Enabling Colleagues have forecast delivery of affordable homes which exceeds the requirement. The delivery of affordable homes is given significant weight in this case.

5.241 Whilst the detail around delivery of custom build plots is minimal, the applicant has stated that they will provide the required 5%. The Council currently is falling short in its delivery and the addition of the 9 plots can be attributed significant weight.

5.242 There would be new jobs provided during the construction phase of the development as well as possibly in the operative phase if the shop is delivered and in relation to the maintenance of the open spaces. The local economy would benefit also from increased patronage. This benefit can be ascribed moderate weight.

5.243 There are a number of other benefits of the scheme BNG in excess of the soon to be mandatory requirement of 10%; the potential for a shop which if delivered will serve the whole community; crossing points over the B4060; a gateway feature to the village; redirected PRoW which will improve the route and create better connections to the wider network and countryside beyond. These can be attributed limited weight as benefits of the scheme.

5.244 It can be seen from the above that whether the adverse impacts significantly and demonstrably outweigh the benefits is finely balanced. However, in this case, after careful consideration, it is considered that they do not.

5.245 **Conclusion**

6.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, Local Planning Authorities are required to determine applications in accordance with the policies of the Development Plan, unless material considerations indicate otherwise.

6.2 The proposal would be contrary to policies CS1, CS2, CS5, CS9, CS15 and CS34 in the CS and policies PSP2, PSP17 & PSP40 in the PSP DPD. These are considered to be the most important policies in determining this application and so the proposal would conflict with the development plan when taken as a whole, unless there are material considerations that indicate otherwise, the decision should be made in accordance with the development plan.

6.3 However, recent appeal decisions at LWoPF and Old Sodbury concluded that policies CS5, CS9, CS34 and PSP17 were not compliant with the framework and thus could be disregarded. The decision where it refers to these policies is set out in the tilted balance above and concludes that, on balance, the adverse impacts of the development would not significantly and demonstrably outweigh the benefits and the application should be granted subject to a legal agreement and conditions as set out below:-

6.4 That authority be delegate to the Director of Environment and Community Services to grant permission, subject to:

- The conditions set out below; and
- Completion of a S106 agreement to incorporate the following to allow flexibility due to housing numbers being up to 180 (figures set for 180)  
:-

Topic/Item	Details	Actions/Notes
<b>S106 Planning Obligations</b>		
<b>Affordable Housing</b>		
Quantum	<b>35%</b> of up to 180 dwellings generates a requirement of up to <b>63</b> Affordable Homes;	As Housing Enabling Officer consultation response
Tenure	<ul style="list-style-type: none"> <li>• 72% Social Rent (SR) i.e. 45 homes</li> <li>• 28% Affordable Home Ownership i.e. 18 units.</li> </ul>	As Housing Enabling Officer consultation response
Mix and Layout	SHMA compliant mix requested, see detailed AH Officer comments	As Housing Enabling Officer consultation response
Standards	<ul style="list-style-type: none"> <li>• 8% of Affordable Housing to be provided as Wheelchair accommodation (social rent tenure) and meet Part M of the Building Regulations accessibility standards M4(3)(2)(a).</li> <li>• M4(2) &amp; M4(3)(2)(a) Building Regulations accessibility standards will be subject to planning conditions.</li> </ul>	As Housing Enabling Officer consultation response
<b>Transport and Highways</b>		
Public Transport	Bus Service Contribution <b>TBC</b> - Figure to be negotiated.	
Off-site Highway Works	Off-site highway works as shown on <b>NRP Drawing 7909-SK02 Rev 2.0</b> , comprising: <ul style="list-style-type: none"> <li>- New Southbound bus stop with footway extensions to tie in;</li> <li>- New Zebra Crossing, with footway extensions to tie in;</li> <li>- Village gateway with speed roundels and fencing;</li> </ul>	
Travel Plan Measures	Revised Residential Travel Plan required including monitoring fees.	
Upgrade signals at B4060/B4509 junction	Upgrade to MOVA	

<b>Education</b>		
Nursery Contribution	<b>£210,368</b> for 19 places (pupil yield)	As Education Officer Consultation response
Primary Contribution	<b>£1,083,295</b> for 65 places (pupil yield)	As Education Officer Consultation response
Secondary Transport (Contribution)	<b>£325,634</b> for 33 pupils (pupil yield)	As Education Officer Consultation response
Secondary School Contribution	<b>£833,550</b> for 33 pupils (pupil yield)	
<b>Public Open Space and Sport</b>		
<u>On-Site POS</u>		
Informal Recreational Open Space	At least <b>4,968sqm</b>	As POS Officer Consultation response
Natural and Semi-Natural Open Space	At least <b>6,480sqm</b>	As POS Officer Consultation response
Provision for Children and Young People	At least <b>1,080sqm</b>	As POS Officer Consultation response
Allotments	At least <b>864sqm</b>	As POS Officer Consultation response
POS inspection fees	<b>£63.96</b> per 100sq.m. plus <b>£615.90</b> core service fee	As POS Officer Consultation response
A plan indicating the types and quantities of public open space proposed together with plan for maintenance.		As per POS consultation response.
<u>Off-Site POS</u>		
Outdoor Sport Contribution	<b>£402,796.11</b> plus <b>£121,913.16</b> maintenance contribution	As POS Officer Consultation response
<b>Other Community Infrastructure/Services</b>		
Library Services	Library enhancement contribution of <b>£49,979.59</b> and Library Stock contribution of <b>£3,564.00</b>	As Community Infrastructure Officer consultation response
Dedicated Community Centre	Contribution of <b>£296,234.67</b> based on the January 2022 cost calculator	As Community Infrastructure Officer consultation response
Retail Unit	Secure 0.15ha for retail unit construct shell with servicing and fencing.	
<b>Self/Custom Build</b>		
Self or Custom Build Homes	<b>5%</b> of total dwellings (up to 9 plots) to be provided as Self or Custom Build homes.  Details of the number of CB plots on a plan	As Self-Build Officer consultation response



	<ul style="list-style-type: none"> <li>- Delivery Statement</li> <li>- Design Code</li> <li>- Marketing Strategy</li> </ul> <p>Plot Passports for all CSB plots</p> <p>Not more than 50% of non-CB dwellings shall be first occupied until 40% of the SCB plots are in a serviced, remediated condition and marketed appropriately.</p> <p>Not more than 85% of the non-CB dwellings shall be first occupied until all of the SCB plots are in a serviced and remediated condition and marketed appropriately.</p> <p>Each SCB plot shall be Marketed Appropriately during first marketing period.</p> <p>Initial Occupant of any SCB Dwelling shall only be persons who have primary input into Dwelling's final design and layout.</p> <p>First marketing period – SCB Dwelling Second Marketing period – either a SCB Dwelling or a Shell Home.</p> <p>Pay the Council sum of 1% of the purchase price agreed for the SCB Plot (per plot)</p> <p>End of second marketing period – offer to sell SCB plot to the council at open market value</p>	
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## 6.5 Conditions

1. The development hereby permitted shall be begun either before the expiration of three years from the date of this permission, or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

Reason: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. No development shall commence on site until details of the following matters (in respect of which approval is expressly reserved) have been submitted to, and approved in writing by, the Local Planning Authority:

- (a) The scale of the development;
- (b) The layout of the development;
- (c) The external appearance of the development;
- (d) The landscaping of the site;

The development shall be carried out in accordance with the approved details.

Reason: The application was made for outline planning permission and is granted to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 and Article 5 (1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

3. An application for the approval of all of the reserved matters shall be made to the Local Planning Authority before the expiration of three years from the date of this permission.

Reason: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990.

4. Prior to the submission of any Reserved Matters application or concurrently with the first submission, a plan showing the phasing of development shall be submitted to and approved in writing by the Local Planning Authority. The phasing plan shall indicate the scale and sequence of build out including the relationship of dwellings to the delivery of infrastructure. For the avoidance of doubt, it is essential that each self-build plot is an individual, future phase.

The development shall be carried out in accordance with the approved phasing plan.

Reason: To define the permission and to ensure that the development is comprehensively planned, designed and phased to ensure that the provision of the different land uses within the site are delivered and protected in order to comply with the relevant policies in the Development Plan.

5. The development hereby permitted shall be carried out in accordance with the following approved plans:

Revised Masterplan 3001 Rev M  
Landscape Strategy edp6190\_d026a  
Drainage Strategy B05313 P05 Sheet 1  
Drainage Strategy B05313 P04 Sheet 2

Proposed Access Plan - Southern – 7909-SK02 Rev 2.0

Received – 3<sup>rd</sup> March 2023.

Site Location Plan

Proposed Access Plan – Northern – B05313 Rev C SK05

Topography Plan 1002

Received 24<sup>th</sup> February 2022.

Stage 1 & 2 Arboricultural Impact Assessment Report by RSK biocensus received 22nd February 2022.

Reason: For the avoidance of doubt and in the interests of proper planning.

6. Any reserved matters application shall be provided with the following: -
- a) All building facing materials and finishes.
  - b) Details of access arrangements including: the internal highway hierarchy; all carriageway, footway, cycleway and shared surface widths and surface material finishes for the highways, footpaths, cycle ways, private drives and all other hard surfaces.
  - c) Car and cycle parking facilities.
  - d) Details of screen walls, fences and other means of enclosure.
  - e) Details of existing and proposed ground levels and proposed finished floor levels and building heights.
  - f) Broadband connection infrastructure timetable for implementation.
  - h) Details of the pedestrian and cycle links through the site.
  - g) Details of undergrounding of overhead electricity cables.
  - i) A combined drainage, landscaping and street lighting plan.
  - j) Minor artefacts and structures (e.g furniture, play equipment, refuse or other storage units, signs, lighting).
  - k) Soft landscape works showing planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate; implementation programme.
  - l) Details of all open space and landscape infrastructure works including timing of delivery related to triggers for occupation of dwellings
  - m) Details and the timing of the diversion of footpath LWR/23/30 to run through the north of the site.

The development shall be carried out in accordance with the approved details.

Reason: To define the permission and ensure the development is carried out in a timely and appropriate way.

7. All soft landscaping comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the first occupation of the building(s) or the completion of the development whichever is the sooner; All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of five years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the local planning authority, except where the planting relates to land within designated Public Open Space where the requirement for replacement planting is in perpetuity. All hard landscaping shall also be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a programme to be agreed in writing with the Local Planning Authority.

Reason: To ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

8. The retail unit hereby permitted shall not exceed 500sqm in floor area gross. The unit shall only be used for purposes within Class E(a) of the Town and Country Planning (Use Classes) Order 1987 (as amended) and shall be constructed with on-site parking to comply with the Council's Parking Standards.

Reason: To preserve the viability and vitality of planned town centres and to ensure the delivery of the required use.

9. Any Reserved Matters application shall be accompanied by an updated Sustainability Statement, to be approved in writing by the Local Planning Authority. The statement shall cover at least the following matters:
  - Climate adaptation and resilience to overheating.
  - Reduction in residual emissions.
  - On-site renewables
  - Heating and hot water systems
  - Fabric efficiency

Any agreed recommendations within the report shall be implemented in accordance with the timescales in the agreed report.

Reason: To ensure that any development reflects current guidance.

10. Prior to the commencement of the development hereby permitted a public art programme that is relevant and specific to the development and its locality and commensurate with its size and importance shall be submitted to and approved in writing by the Local Planning Authority. The programme shall include full details and designs to be agreed as part of reserved matters as well as a

scheme for the ongoing maintenance of the agreed work. The public art programme should be devised and managed by a public art professional to ensure a high quality scheme.

Reason: In order to comply with Policy CS1 Design point (7). This is required as a pre-commencement condition to ensure that any public art is successfully integrated into the wide scheme.

11. Any Reserved Matters application shall be accompanied by a phasing plan showing the location of the self-build plots together with a design code for their delivery on the development hereby permitted. The development shall be carried out in accordance with the agreed phasing plan and design code.

Reason: To ensure the correct delivery of self-build plots in accordance with Policy PSP42.

12. Prior to the commencement of development a programme of archaeological investigation and recording for the site shall be submitted to and approved by the Local Planning Authority. Thereafter, the approved programme shall be implemented in all respects.

Reason: To ensure the appropriate archaeological investigations and recording are undertaken in compliance with policy PSP17.

13. The development shall not be brought into its intended use until (i) the results of the programme of archaeological investigation and post investigation assessment has been completed in accordance with an approved Written Scheme of Investigation and (ii) that the provision for analysis, publication and dissemination of results (where necessary and based upon the significance of the archaeology found), and archive deposition, has been confirmed in writing to, and approved by, the Local Planning Authority.

Reason: To ensure the appropriate archaeological investigations and recording are undertaken in compliance with policy PSP17.

14. No demolition, site clearance or development shall commence on site, and no equipment, machinery or materials shall be brought on to site for the purpose of development, until an Arboricultural Method Statement, a Tree Constraints Plan and a Tree Protection Plan in accordance with British Standard 5837: 2012: "Trees in Relation to Design, Demolition and Construction - Recommendations"; has been submitted to and approved in writing by the Local Planning Authority.

No fires shall be lit within 15 metres of the furthest extent of the canopy of any retained trees or hedgerows on site or adjoining land and no concrete, oil, cement, bitumen or other chemicals shall be mixed or stored within 10 metres of the trunk of any tree or group of trees to be retained on the site or adjoining land. No machinery shall be stored within 10 metres of the trunk of any tree or group of trees to be retained on the site or adjoining land.

Reason: To ensure the retention of trees on the site in the interests of visual amenity.

15. Prior to the commencement of the development hereby permitted a construction traffic management plan shall be submitted to and approved in writing by the local planning authority (in consultation with National Highways). The plan shall include as a minimum: construction vehicle movements and routes (noting the 17 tonne weight restriction north of the site (in the centre of the village, and enforcement details); construction operation hours; construction delivery hours; expected number of construction vehicles per day; car parking for contractors' vehicles; arrangements for off-loading and storage of construction plant and materials. Works shall be carried out in accordance with the approved plan.

Reason: in the interest of the safe and efficient operation of the M5.

16. No dwelling shall be occupied, until a Revised Green Travel Plan has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall include details of implementation and monitoring and shall be implemented in accordance with these agreed details. The results of the implementation and monitoring shall be made available to the Local Planning Authority on request, together with any changes to the plan arising from those results.

Reason: In the interests of road safety and reducing vehicular traffic to the development.

17. No development shall commence on site until a scheme for the discharge of surface water from the site (including surface water from the access/driveway), incorporating sustainable drainage details, has been submitted to and approved in writing by the Local Planning Authority. The development shall not be first occupied until surface water drainage has been constructed in accordance with the approved scheme.

Reason: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to ensure that the development can be adequately drained.

18. Prior to any site clearance or the commencement of the development hereby permitted, a Construction Environmental Management Plan (CEMP) with detailed mitigation measures as set out in the Ecological Appraisal and Addendum to the Ecological Appraisal (Prepared by EDP and submitted February 2022 and 2023 respectively) shall be submitted to and approved in writing by the Local Planning Authority. The CEMP shall include those measures proposed for Great Crested Newts (GCN) in accordance with the EPS Mitigation Licence or the District Licence. The CEMP shall be adhered to at all times.

Reason; To prevent harm to Protected Species.

19. Prior to commencement, details of external lighting should be submitted to and approved in writing by the LPA. The details should clearly demonstrate that lighting will not cause excessive light pollution or disturb or prevent bat species using key foraging / commuting corridors and habitat features or accessing roost sites. The details should include, but not be limited to, the following:
- i. A drawing showing sensitive areas and/or dark corridor safeguarding areas
  - ii. Description, design or specification of external lighting to be installed including shields, cowls or blinds where appropriate.
  - ii. A description of the luminosity of lights and their light colour including a lux contour map
  - iii. A drawing(s) showing the location and where appropriate the elevation of the light fixings
  - iv. Methods to control lighting control (e.g. timer operation, passive infrared sensor (PIR)).

All external lighting should be installed in accordance with the specifications and locations set out in the approved details. These should be maintained thereafter in accordance with these details. Under no circumstances should any other external lighting be installed unless agreed with the LPA.

Reason: To mitigate the ecological impact of the development.

20. 35% of the Affordable Dwellings shall be constructed to meet Part M of the Building Regulations accessibility standard M4(2) with the exception of:
- 1) Any self-contained accommodation built above ground floor level where level access is not achievable;
  - 2) The 8% affordable homes required to meet;
    - Part M of the Building Regulations accessibility standard M4(3)(2)(a); and
    - Part M of the Building Regulations accessibility standard M4(3)(2)(b) and paragraph M4(3) paragraphs 3.37 and 3.39 to provide a ground floor level wheelchair accessible wet room which shall contain a WC, a basin and a level access shower.

Reason: To ensure inclusive design access for all in accordance with Policy PSP37 of the adopted South Gloucestershire Local Plan: Policies, Sites and Places Plan.

*Informative: The person carrying out the building work must inform the building control body of the Planning Condition requiring M4(2) & M4(3)(2)(a) & M4(3)(2)(b) compliance as the building control body will be required to determine compliance with Part M of the Building Regulations accessibility standards M4(2), M4(3)(2)(a) and M4(3)(2)(b) paragraphs 3.37 and 3.39.*

21. Prior to the first laying out of the allotments within the site, details of the method of laying out and providing topsoil/growing medium suitable for growth of human food, shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented before the first use of the allotments.

Reason: The land has been shown to possess high levels of zinc, which may lead to growing conditions unsuitable for human consumption.

22. Prior to the commencement of development, including any works of demolition, a Construction Management Plan shall be submitted to and approved in writing by the Local Planning Authority. All works shall proceed in accordance with approved details. For the avoidance of doubt, the Plan shall include details of:
- i. The hours of working
  - ii. Traffic management operations on the public highway:
  - iii. The management of parking of vehicles of site operatives and visitors
  - iv. Loading and unloading of plant and materials
  - v. Storage of plant and materials used in constructing the development
  - vi. The erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate
  - vii. Wheel washing facilities
  - viii. A detailed Dust Management Plan (DMP), with measures to control the emission of dust and dirt during construction
  - ix. Details to monitor air quality during construction
  - x. A scheme for recycling/disposing of waste resulting from demolition and construction works

The works shall be carried out in accordance with the agreed details.

Reason: To protect the residential amenity of local residents.

23. Prior to the commencement of any works within the site, including any earthworks at least one of the approved accesses shall be constructed to Council adoptable standards with hardstanding to a minimum of 20m within the site to enable wheel washing facilities etc.

Reason: To prevent mud egressing onto roads and causing a highway danger.

24. No development shall commence until a Landscape and Ecological Management Plan (LEMP) for the site has been submitted to and approved in writing by the Local Planning Authority. The management plan shall include the results of an ecological and tree surveys of the site, and a detailed scheme of protection, mitigation and compensation measures to be incorporated within the development, including a timetable for the implementation of the scheme and for the monitoring of the impact of the development on the ecological features.



The LEMP should include all the measures proposed for GCN in accordance with the EPS Mitigation Licence or the District Licence. It should also include plans showing locations and extent of all habitats and wildlife features, and a timetable of activities. A Responsible Person / organisation needs to be stated and the method by which the protection of retained and created habitats and open spaces will be secured. The LEMP should demonstrate that the Bio-Diversity Net Gain (BNG) proposed in the BNG Assessment has been achieved

The LEMP shall cover the enabling works operations/period and a subsequent management period (in perpetuity), identifying existing and proposed landscape and ecology related site assets, associated management objectives, schedules of annual maintenance works together with longer term management operations (e.g. cyclical management or replacement of dead/diseased/poor quality plant stock) for each landscape treatment or ecological habitat area/feature. Maintenance of hard landscape areas, boundary features, SuDs features, play areas should also be included where appropriate including any associated safety inspections/audits and replacement of damaged items or wear and tear.

The development and the requirements of the management plan shall subsequently be commenced prior to the development being occupied and carried out in accordance with the approved details.

Reason: To ensure that the development is undertaken in an acceptable manner and to ensure ongoing protection, mitigation and compensation for protected species and landscape features and site facilities throughout the lifetime of the development.

25. Prior to the submission of or concurrently with the submission of any Reserved Matters application, a Detailed Green Infrastructure and Landscape Design and Mitigation Strategy Plan at a 1:500 scale based on topographical and tree survey base information, with the new POS, greenways and the features they contain (e.g. SUDS) shown together with all existing and proposed structure planting and location of the proposed rain gardens, shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the landscaping of the whole development is considered at the outset of the development and provide the necessary landscape mitigation for the development.

26. Prior to the commencement of the development hereby approved, details of tree and hedge protection measures, including construction method statements and calculation of the replacement number of trees required, shall be submitted to and approved in writing by, the Local Planning Authority. Thereafter the agreed details and methods shall be adhered to throughout the life of the development's construction.

Reason: To protect the trees and hedges on site and secure their longevity.

27. The development shall be carried out in accordance with the noise mitigation measures contained within the Noise Assessment by Wardell Armstrong (dated November 2021 received by the Council on 24<sup>th</sup> February 2022, the details of which shall be supplied at reserved matters stage and once approved shall be permanently maintained thereafter.

Reason: To protect future residents from unacceptable noise levels.

28. The Phase 1 Preliminary Risk Assessment (Desk Study) at South Farm by Clarkebond dated 02/04/20 noted that asbestos was identified as a contaminant of concern and therefore particular care should be taken. In the event of any unexpected contamination being identified, all development on site shall cease in that area until such time as an investigation has been carried out and a written report submitted to and approved in writing by the Local Planning Authority, with any remedial works recommended in that report being undertaken and written confirmation has been provided to the Local Planning Authority that such works have been carried out. Construction shall not recommence until the written agreement of the Local Planning Authority has been given following its receipt of verification that the approved remediation measures have been carried out.

Reason: To ensure that land contamination can be dealt with appropriately prior to the use of the site.

**Case Officer: Charmian Eyre-Walker**  
**Authorising Officer: Eileen Paterson**



## **Strategic Sites Delivery Committee**

Thursday, 3rd August, 2023

### **Present**

Councillors: April Begley, Michael Bell, Liz Brennan, Katie Cooper, Mike Drew, Franklin Owusu-Antwi, Adrian Rush, Raj Sood and Kristopher Murphy

Eileen Medlin	Senior Planning Officer (Item 11)
Charmian Eyre- Walker	Principal Planning Officer (Item 12)
Eileen Paterson	Major Sites Manager
Myles Kidd	Transport Development Control Manager
Paul Johnson	Democratic Services Officer
Solicitor	Tonya Meers

### **Apologies for Absence**

There were no apologies.

#### **15 WELCOME AND INTRODUCTIONS (Agenda Item 1)**

Councillor Katie Cooper welcomed everyone to the meeting.

#### **16 APOLOGIES FOR ABSENCE (Agenda Item 2)**

There were none.

#### **17 EVACUATION PROCEDURE (Agenda Item 3)**

The Chair drew attention to the evacuation procedure.

#### **18 DECLARATIONS OF INTEREST UNDER THE LOCALISM ACT 2011 (Agenda Item 4)**

There were none.

#### **19 GLOSSARY OF TERMS (Agenda Item 5)**

This item was reported for information only.

#### **20 ANY OTHER ITEMS WHICH THE CHAIR DECIDES ARE URGENT (Agenda Item 6)**

There were no urgent items.

**21 MINUTES OF THE MEETING HELD 6 JULY 2023 (Agenda Item 7)**

**RESOLVED** that the minutes be confirmed as a correct record of the meeting for signing by the Chair.

**22 ACTIONS ARISING FROM THE SITE VISITS HELD 24 JULY 2023 (Agenda Item 8)**

The actions were noted.

**23 ITEMS FROM MEMBERS (Agenda Item 9)**

Further to issues raised at the previous meeting, Councillor Michael Bell welcomed the proposal to provide more detail within site reports.

**24 ITEMS FROM THE PUBLIC (Agenda Item 10)**

Representations received from members of the public are recorded under each respective item.

**25 P22/04365/RM - PARCELS PL2, PL4A, PL4B & PL5B LAND AT NORTH YATE NEW NEIGHBOURHOOD (Agenda Item 11)**

**Alex Winter, spoke on behalf of the applicant** and advised that following the debate at the previous meeting a couple of amendments had been made to the proposals, including:

- The replacement of a timber knee rail with a higher metal estate railing to further restrict access to the end of the Parcel PL2 parking courtyard
- The inclusion of a 2m timber acoustic fence along the end of the same parking courtyard to reduce noise transmission across the boundary

The applicant also acknowledged the concerns raised regarding the ongoing ability of YOSC to carry out its varied programme of activities once the proposals had been delivered and into the future. Barratt Homes considered YOSC to be a fantastic asset to all local residents and did not wish to see its activities curtailed. To this end, they have obtained consent under a Non-Material Amendment to the Infrastructure RM, to upgrade the proposed fence running the full length of PL4A to a 2m high acoustic timber fence. The fence would be installed in the first phases of construction of the parcel and will be complete prior to occupation of the adjacent plots in line with the proposed condition.

The Senior Planning Officer introduced the report and displayed a number of plans and images to show the site in its context. Members were advised that the following additional condition should be added to the officer recommendation:

The acoustic fence and estate railing located to the south of the parking area serving Plots 332 -338 as shown on the drawing 0642-14-102 H Planning Layout-A0L, received 18th July 2023 shall be provided before dwellings in plots 332 -338 are first occupied.

Reason:

In the interest of the amenities of existing and future occupants and to accord with policy PSP8 and PSP21 of the Policies and PSP21 of the Policies Sites and Places Plan (adopted) November 2017.

Councillor Adrian Rush moved

1. That reserved matters consent be granted subject to the conditions set out within the report.
2. That the following additional condition be imposed:

The acoustic fence and estate railing located to the south of the parking area serving Plots 332 -338 as shown on the drawing 0642-14-102 H Planning Layout-A0L, received 18th July 2023 shall be provided before dwellings in plots 332 -338 are first occupied.

Reason:

In the interest of the amenities of existing and future occupants and to accord with policy PSP8 and PSP21 of the Policies and PSP21 of the Policies Sites and Places Plan (adopted) November 2017.

The motion was seconded by Councillor Michael Bell.

Councillor Mike Drew welcomed the amendments made to the application following discussions at the previous meeting but drew attention to the fact that YOSC were now having to bear the cost of putting in a planning application for the erection a ball net along the boundary to stop any risk from balls going over.

On being put to a vote, Councillor Rush's motion was unanimously CARRIED and

## **RESOLVED**

1. That reserved matters consent be granted subject to the conditions set out within the report.
2. That the following additional condition be imposed:

The acoustic fence and estate railing located to the south of the parking area serving Plots 332 -338 shown on the drawings hereby approved shall be provided before dwellings in plots 332 -338 are first occupied.

Reason:

In the interest of the amenities of existing and future occupants and to accord with policy PSP8 and PSP21 of the Policies and PSP21 of the Policies Sites and Places Plan (adopted) November 2017.

**26 P22/01300/O – LAND AT SODBURY ROAD, WICKWAR (Agenda Item 12)**

**Jonathan Dodd, agent for the application** spoke in support of the proposal and made the following points:

- Bloor Homes have a track record of working with the Council to deliver homes in South Gloucestershire.
- All homes will have an enhanced building fabric, and will utilise air source heat pumps, solar panels and electric vehicle charging points.
- The harm to the landscape must be weighed against the benefits of a proposal. The site is not located in the Green Belt or AONB.
- Detailed design is a reserved matter.
- The proposed shop will enhance the sustainability of the village for both new and existing residents.
- The shop is planned to form an urban design feature, creating a new gateway character to the village alongside a new bus stop and crossing.
- The delivery of the shop can be safely secured through S106 and/or condition.
- The Council have recently secured an extension to the 84/85 service which runs on Sodbury Road, and additional contributions are secured through the Section Agreement
- The proposals include the construction of a southbound bus stop on Sodbury Road.

**Councillor Becky Romaine spoke as the Ward Councillor** and made the following points:

- Attention was drawn to the level of objection.
- The plans will increase the traffic along this section of road, which will have a negative impact on an already overloaded road network between Wickwar and Yate.
- The provisions made for a local shop were welcomed but the arising benefits did not outweigh the harm.
- Access to education was a concern.

The Principal Planning Officer introduced the report and displayed a number of plans and images to show the site in its context.

The Principal Planning Officer updated Members on the following issues:

Consultation responses

40 letters further have been received objecting again to the application. It is considered that most are due to the notification of the appeal, but 3 are specific to the item at this Committee. No new issues have been raised.

### Additional Conditions

The following condition should be added:

- Prior to the commencement of the development hereby approved, details of a pre-commencement badger survey shall be submitted to and approved in writing by, the Local Planning Authority. Any mitigation required shall be undertaken prior to commencement of the development.  
Reason: In the interests of safeguarding a protected species.

### Alterations to conditions

The following conditions require alteration as per the wording underlined and in italics.

Condition 6 –

Any reserved matters application shall be provided with the following: -

- a) All building facing materials and finishes.
- b) Details of access arrangements including: the internal highway hierarchy; all carriageway, footway, cycleway and shared surface widths and surface material finishes for the highways, footpaths, cycle ways, private drives and all other hard surfaces.
- c) Car and cycle parking facilities.
- d) Details of screen walls, fences and other means of enclosure.
- e) Details of existing and proposed ground levels and proposed finished floor levels and building heights.
- f) Broadband connection infrastructure timetable for implementation.
- g) Details of the pedestrian and cycle links through the site.
- h) Details of undergrounding of overhead electricity cables.
- i) A combined drainage, landscaping and street lighting plan.
- j) Minor artefacts and structures (eg furniture, play equipment, refuse or other storage units, signs, lighting).
- k) Soft landscape works showing planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate; implementation programme.
- l) Details of all open space and landscape infrastructure works including timing of delivery related to triggers for occupation of dwellings
- m) Details and the timing of the diversion of footpath LWR/23/30 to run through the north of the site.
- n) *Detailed design for SUDS basins and features to demonstrate how these will be sympathetically integrated into open spaces/green corridors.*
- o) *Detailed designs for proposed play areas.*

The development shall be carried out in accordance with the approved details.

Reason: To define the permission and ensure the development is carried out in a timely and appropriate way.

Condition 7 –

All soft landscaping comprised in the approved details of landscaping (with the exception of Public Open Space) shall be carried out in the first planting and seeding season following the first occupation of the building(s) or the completion of the development whichever is the sooner; All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of five years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the local planning authority, except where the planting relates to land within designated Public Open Space where the requirement for replacement planting is in perpetuity. All hard landscaping shall also be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a programme to be agreed in writing with the Local Planning Authority.

Reason: To ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

Condition 14 –

No demolition, site clearance or development shall commence on site, and no equipment, machinery or materials shall be brought on to site for the purpose of development, until an Arboricultural Method Statement, a Tree Constraints Plan and a Tree Protection Plan in accordance with British Standard 5837: 2012: "Trees in Relation to Design, Demolition and Construction - Recommendations"; has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

No fires shall be lit within 15 metres of the furthest extent of the canopy of any retained trees or hedgerows on site or adjoining land and no concrete, oil, cement, bitumen or other chemicals shall be mixed or stored within 10 metres of the trunk of any tree or group of trees to be retained on the site or adjoining land. No machinery shall be stored within 10 metres of the trunk of any tree or group of trees to be retained on the site or adjoining land.

Reason: To ensure the retention of trees on the site in the interests of visual amenity.

Condition 17 –



No development shall commence on site until a scheme for the discharge of surface water and foul sewage drainage from the site (including surface water from the access/driveway), incorporating sustainable drainage details, has been submitted to and approved in writing by the Local Planning Authority. The development shall not be first occupied until surface water drainage has been constructed in accordance with the approved scheme.

Reason: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to ensure that the development can be adequately drained.

#### Condition 19 –

Prior to commencement, details of external lighting should be submitted to and approved in writing by the LPA. In relation to adoptable road lighting, this will be designed in line with SGC's Street Lighting Material Specification. Private lighting shall be designed in line with the relevant ILP guidance. Additionally, the details should clearly demonstrate that lighting will not cause excessive light pollution or disturb or prevent bat species using key foraging / commuting corridors and habitat features or accessing roost sites. The details should include, but not be limited to, the following:

- i) A drawing showing sensitive areas and/or dark corridor safeguarding areas
- ii. Description, design or specification of external lighting to be installed including shields, cowls or blinds where appropriate.
- ii) A description of the luminosity of lights and their light colour including a lux contour map
- iv. A drawing(s) showing the location and where appropriate the elevation of the light fixings
- v. Methods to control lighting control (e.g. timer operation, passive infrared sensor (PIR)).

All external lighting should be installed in accordance with the specifications and locations set out in the approved details. These should be maintained thereafter in accordance with these details. Under no circumstances should any other external lighting be installed unless agreed with the LPA.

Reason: To mitigate the ecological impact of the development.

#### Condition 25 –

Prior to the submission of or concurrently with the submission of any Reserved Matters application, a Detailed Green Infrastructure and Landscape Design and Mitigation Strategy Plan at a 1:500 scale based on topographical and tree survey base information, with the new POS, greenways and the features they contain (e.g. SUDS) shown together with

all existing and proposed structure planting and location of the proposed rain gardens, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the agreed details.

Reason: To ensure that the landscaping of the whole development is considered at the outset of the development and provide the necessary landscape mitigation for the development.

#### Additions to S106 Agreement

The following should be added or noted to any Legal Agreement:

- 1) Wording amended In Transport Section to refer to 'controlled crossing' rather than zebra crossing and to include pedestrian crossing to North junction as shown on drawing B05313 Rev C SK05.
- 2) Remove ...'with plan for maintenance' from On-site POS as is covered by condition 24 (LEMP).
- 3) Retail Unit – Add in timings for delivery.
- 4) Indexation will be added to all figures.
- 5) The full requirements for each element are set out in detail in each consultee's response and will be included in the S106.

#### Additional information.

Highways confirm that in relation to the 2 junctions (which are for approval):

The proposed layouts of the two access points (vehicular and pedestrian) are acceptable in transport terms for the purposed of planning:

- The southern access is to tie in to the proposed (northbound) bus stop provided by the Land South of Poplar Lane development to the south of the junction, together with an uncontrolled pedestrian crossing point (also provided by the Land South of Poplar Lane development). The development provides a pedestrian crossing to its north to link to the pedestrian / cycle infrastructure on the east side of Sodbury Road, noting the lack of footway on the west side. It is accepted as impractical to provide a footway along the west side of Old Sodbury Road. The detail of the crossing may be amended at detailed design stage with associated road safety audit given the proximity of the traffic calming to its north. The visibility splays exceed those set out from Manual for Streets.
- The northern access (just south of Amberley Way) ties into the narrow footway either side, and proposed to move the uncontrolled pedestrian crossing island / refuge closer to the mini-roundabout at Amberley Way which is considered acceptable subject to detailed design and appropriate safety audit. Visibility splays are appropriate for 25mph speed of passing traffic from Manual for Streets, noting that the splay is influenced by the narrow footways, and the traffic calming feature to the

immediate south of the junction should help manage traffic speeds. I have no concerns over visibility.

Councillor Adrian Rush spoke against the proposal on the following grounds:

- Harm to heritage assets at South Farem and Frith Farm.
- Increased reliance on car borne transport.
- Provision of Affordable Housing in an area reliant on car borne transport.
- Inadequate infrastructure and services to support the development – access to education and public transport.
- Landscape impact.
- The Council was currently maintaining a 5-year housing land supply with good delivery rates.

Councillor Mike Drew spoke against the proposal on the following grounds:

- Inadequate infrastructure and services to support the development.
- Increased reliance on car borne transport.
- Inadequate public transport provision.
- Landscape impact.

Councillor Drew went on to ask whether the Section 106 Agreement could be amended to say that any public open space should be the responsibility of the Council and that the developer make the relevant contributions. Councillor Drew expressed concerns regarding the potential for management companies to exploit new residents through high management fees.

In response, the Major Sites Manager advised that developers have the option to choose whether the Council takes on the public open space or whether they run it through a private management company, or a management company that's operated by residents. The Core Strategy states that the Council is willing to take on adoption of public open space, but it is a matter for the developer - the Council cannot force the developer to put the land up for adoption by the Council.

The Chair guided Members through the planning balance. During the ensuing discussion the following issues were raised.

Members agreed that there was a clear landscape harm, and it was considered that the magnitude of this harm meant that it should be given significant weight.

The increased reliance on car borne transport was given substantial weight despite attention being drawn to the public transport contributions within the Section 106 Agreement, the recent introduction of Dynamic Demand Response Transport in the area, and Travel Plan measures aimed at establishing modal shifts during early occupation of the development by the Major Sites Manager.

Members were concerned that the development would be largely car dependent, and whilst it was noted that a contribution would be secured towards public transport during the first 5 years of occupation, concerns were raised that existing bus services were limited and that they were currently only funded in the short term and might not be operational in one years' time.

Members were concerned that the application would conflict with the spatial strategy as it involved development on a greenfield site outside any currently identified settlement boundary.

The Major Sites Manager advised that this should be given limited weight because of the findings of the Planning Inspector that the settlement strategy policies are out of date, and that this has been accepted by the Council.

Members considered that the conflict with Spatial Strategy should be given significant weight on the grounds that the Council had already taken a view that the settlement strategy was out of date when they approved the two housing developments on the opposite side of Sodbury Road, and that the current application represented a step too far given the lack of supporting infrastructure and impact upon the character of the village and the Conservation Area.

The Major Sites Manager reaffirmed her view that this should be given limited weight because the Council has agreed that its settlement strategy is out of date.

The loss of the land from agriculture was attributed limited weight.

The effect of increased recreational pressure on Lower Woods SSSI was considered to be minor and was therefore attributed limited weight.

Members agreed that less than substantial harm would be caused to the two heritage assets, South Farm and Frith Farm, which is at the lower end of the scale. Nevertheless, despite there being no objection from the Conservation Officer, this harm was a matter of great concern and importance. The impact upon the character and setting of South Farm was given moderate weight due to the impact that the proposed development would have upon the character of the village and the Conservation Area. The impact upon Frith Farm was given limited weight given that it was sited further away from the application site.

Members were concerned that the introduction of a shop would move the centre of the village outside of the Conservation Area, which would be harmful to the heart of the village, which is central to the Conservation Area. The harm to the character and appearance of Wickwar Conservation Area was attributed moderate weight.

It was noted that the Council was currently maintaining a 5-year housing land supply with good delivery rates. Significant weight was attributed to the proposed housing delivery as it was noted that the Settlement Strategy policies have been found to be out-of-date and delivery of this site would contribute towards the Council's ongoing need to provide a 5-year housing land supply.

The delivery of Affordable Housing was given significant weight. Members acknowledged that the provision of Affordable Housing was supported by policy but were somewhat concerned that the housing would be in a largely car dependent location.

Regarding the provision of Self-Build Plots, Members noted that a mix of plot sizes was proposed and acknowledged that the provision of self-build plots was supported by policy. These benefits were attributed significant weight.

Members noted that there would be up to 90 new jobs provided during the construction phase of the development as well as possibly 10 full time and 10 part time jobs in the operative phase if the shop is delivered. These benefits were attributed moderate weight.

Members noted the benefits of the scheme in terms of Biodiversity net Gain, crossing points over the B4060, a gateway feature to the village and the redirected Public Right of Way. The potential for a shop, which would serve the whole of the village was also noted, but concerns raised about its viability without the demand associated with shared trips to other services. These benefits were attributed limited weight.

Councillor Adrian Rush subsequently moved

1) The adverse impacts of the proposal with regard to:

- Landscape Harm (significant weight),
- Increase reliance on car borne transport (substantial weight),
- Loss of Grade 3 agricultural land (limited weight)
- Recreational pressure on SSSI (limited weight)
- Conflict with Spatial Strategy (significant weight)
- Harm to Wickwar Conservation Area (moderate weight),
- Less than substantial harm to South Farm (moderate weight)
- Less than substantial harm to Frith Farm (limited weight)

significantly and demonstrably outweigh the benefits, which are:

- Provision of housing (significant weight),
- Affordable housing (significant weight),
- Provision of self-build plots (significant weight),
- Provision of new jobs (moderate weight),
- Other benefits (potential for a shop, redirected Public Right of Way, highway improvements and connections) (limited weight)

Therefore, applying paragraph 11(d)(ii) of the NPPF, planning permission should be refused.

- 2) The proposal development fails to provide and/or secure adequate provision for necessary on-site and off-site infrastructure. Such infrastructure shall include (but is not limited to) Affordable Housing; Public Transport; off-site highways works; Travel Plan measures; Education contributions to nursery, primary and secondary education and associated transport; Public Open Space; Community Infrastructure; A retail unit and Self-build/custom build homes. The proposal is therefore contrary to policy CS6 of the South Gloucestershire Core Strategy 2006-2027.

On being put to a vote, the motion, which was seconded by Councillor Michael Bell, was unanimously CARRIED and

## **RESOLVED**

- 1) The adverse impacts of the proposal with regard to:

- Landscape Harm (significant weight),
- Increase reliance on car borne transport (substantial weight),
- Loss of Grade 3 agricultural land (limited weight)
- Recreational pressure on SSSI (limited weight)
- Conflict with Spatial Strategy (significant weight)
- Harm to Wickwar Conservation Area (moderate weight),
- Less than substantial harm to South Farm (moderate weight)
- Less than substantial harm to Frith Farm (limited weight)

significantly and demonstrably outweigh the benefits, which are:

- Provision of housing (significant weight),
- Affordable housing (significant weight),
- Provision of self-build plots (significant weight),
- Provision of new jobs (moderate weight),
- Other benefits (potential for a shop, redirected Public Right of Way, highway improvements and connections) (limited weight)

Therefore, applying paragraph 11(d)(ii) of the NPPF, planning permission should be refused.

- 2) The proposal development fails to provide and/or secure adequate provision for necessary on-site and off-site infrastructure. Such infrastructure shall include (but is not limited to) Affordable Housing; Public Transport; off-site highways works; Travel Plan measures; Education contributions to nursery, primary and secondary education and associated transport; Public Open Space; Community Infrastructure; A retail unit and Self-build/custom build homes. The proposal is therefore

contrary to policy CS6 of the South Gloucestershire Core Strategy 2006-2027.

The Major Sites Manager explained that this applicant has lodged an appeal with the Planning Inspectorate against the Council's non-determination of this application. Jurisdiction for the application has now passed to the Planning Inspectorate. Should the Spatial Planning Committee agree with the recommendation of from refusal from this committee. then officers would not be able to represent the Council at a public inquiry. Instead, consultants would be engaged to represent the Council. Should the Spatial Planning Committee endorse the officer recommendation to grant planning permission, officers will then write to the Planning Inspectorate and state that no evidence would be offered up to the public inquiry. The local authority would help the inquiry regarding the Section 106 and conditions.

Meeting closed 1.05pm

I confirm that the minutes are a correct record of the meeting.

Chair