



March 2020

 **GLADMAN**
PLANNING STATEMENT

LAND SOUTH OF HEMPSTED LANE

GLOUCESTER

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APPENDICES

Appendix 1

Section 106 Draft Heads of Terms

EXECUTIVE SUMMARY

- i. This planning statement supports an outline planning application made by Gladman for a site at Land South of Hempsted Lane, Gloucester. The development will comprise up to 245 dwellings (including 20% affordable housing), public open space, landscaping, a sustainable drainage system and a vehicular access point from Hempsted Lane.
- ii. The application is made in outline, with all matters reserved except for access. The access details provide certainty that the site can be accessed acceptably and safely by vehicles, cyclists and pedestrians.
- iii. The application site is well located to the existing urban area and represents a suitable and sustainable location for housing.

Design Led Approach

- iv. The proposed development has been carefully considered to ensure that it will provide high quality sustainable development. The design-led approach, informed by consultation with the key stakeholders and the local community, responds sensitively to the site setting, respecting the grain of the surrounding landscape, both built and undeveloped.
- v. The design directs residential development to the northern part of the site, providing significant open space, including a circular trim trail and two play areas, on the site's southern section. The east and west corridors have also been retained for open space and landscaping, with the east corridor designed to enhance the use of an existing public right of way.
- vi. The complete design framework allows for the provision of a sustainable housing development while retaining 39.7% of the site as public open space.

Benefits Arising from Development at this Location

- vii. The proposal offers the opportunity to deliver:
 - Local benefits, through investment in the local community;
 - New areas of public open space, a publicly accessible trim trail, and local and neighbourhood children's play area;
 - Improvements to biodiversity through on site mitigation strategies and enhancements including additional planting of native species and hedgerows;
 - On site Sustainable Drainage System (SuDS) to improve the surface water flood risk on site
 - District wide benefits, in terms of making a strategically important contribution to housing supply and economic objectives; and

- National objectives in boosting the supply of homes and delivering sustainable development.

Accordance with the Development Plan

- viii. Development proposals should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- ix. The 2017 Joint Core Strategy prepared between Gloucester City, Cheltenham Borough and Tewkesbury Borough sets the housing requirement for the combined area at 35,175 new homes over the plan period 2011-2031. Of these total numbers, it is specified that at least 14,359 new homes represents the requirement for Gloucester and 13,287 dwellings will be provided within the Gloucester City administrative boundary.
- x. In the Inspector's Final Report on the Joint Core Strategy in October 2017, it was noted that while the housing requirement for each of the authorities was accepted in principle, the current strategy could not demonstrate how Gloucester was going to meet the full scope of its housing delivery numbers over the plan period.
- xi. The core strategy was adopted under the explicit understanding that it would be necessary for there to be an immediate review of Gloucester City Council's long-term delivery of their part of the Joint Core Strategy's housing requirement. While a review of the Joint Core Strategy is underway, and a separate Gloucester City Plan has published a Pre-Submission draft, neither document provides sufficient further allocations to ensure the housing requirement for Gloucester City is met in full.
- xii. Furthermore, the 2019 Annual Monitoring Report produced by Gloucester City Council sets the authority's housing land supply at 5.4 years, using the Liverpool Methodology which was expressed as an appropriate measure of the joint authority's housing land supply within the Inspector's October 2017 Report.
- xiii. Gladman contends that these figures overestimate the deliverable supply of housing within Gloucester City, and that the longer-term provision of housing delivery over the entire plan period up to 2031 throughout Gloucester continues to still be unaccounted for.
- xiv. While the development of Land South of Hempsted Lane conflicts with the Joint Core Strategy, insofar as it is not allocated development outside of Gloucester City's administrative boundary, the lack of full housing provision for the Joint Core Strategy's plan period brings into question the weight that the policies of the current strategy should be accorded. This is because it is noted by the inspector that without appropriate review to ensure complete delivery of the required housing figures, the Joint Core Strategy's plan approach would be unjustified, and therefore unsound.
- xv. Without full plan period delivery and in the absence of a housing land supply, these policies should therefore be attributed limited weight in the determination of this proposal. The intention for this scheme to deliver needed housing for the fulfilment

of the Joint Core Strategy's housing requirement should be given significant weight during determination.

Summary

- xvi. An assessment against the up to date provisions of the Development Plan and the Framework where relevant, demonstrates the scheme comprises sustainable development:
- The proposals will comprise a range of benefits, including making a significant contribution towards meeting the objectively assessed market and affordable housing needs of Gloucester Authority, assisting the completion of the Joint Core Strategy's housing requirement
 - As with any greenfield site, the development will introduce changes to the area causing some urbanising effects. The loss of agricultural land is however to be expected, and the LVIA demonstrates the scheme can be delivered without unacceptable wider landscape and visual impacts
 - The scheme adequately demonstrates that it overcomes potential odour concerns and that development of this location will not be adversely affected by smell from Netheridge Works.
 - The proposal offers local betterments via the provision of multiple play areas and a trim trail for the use of the local community. The development framework plan of this proposal demonstrates new planting and green infrastructure will be integrated across the site.
- xvii. The proposals of this development are in accordance with the technical policies within both the Joint Core Strategy and Pre-submission Gloucester City Plan. Gloucester City Council cannot demonstrate how the entirety of its housing requirement will be delivered, nor have they made progress with the required review. Therefore, the policies regarding housing provision should only be given limited weight.
- xviii. The proposals of this development are fully compliant with the Framework and should be considered as acceptable for approval without delay.

1 INTRODUCTION

1.1 Scope of this Statement

1.1.1 This Planning Statement has been prepared in support of an outline planning application for the development of 245 dwellings on Land South of Hempsted Lane, Gloucester. The application is submitted by Gladman Developments Ltd (Gladman).

1.1.2 The description of development is as follows:

“Outline planning application for the erection of up to 245 dwellings with public open space, structural planting and landscaping, surface water flood mitigation and attenuation and vehicular access point from Hempsted Lane. All matters reserved except for means of vehicular access.”

1.2 The Development Plan

1.2.1 The starting point for the determination of this application is the Development Plan comprising of:

- The Cheltenham, Gloucester and Tewkesbury Joint Core Strategy, adopted 11th December 2017;
- Saved Policies from both the 1983 Gloucester Local Plan and 2002 Revised Deposit Local Plan;

1.3 Scope of the Planning Application

1.3.1 The outline planning application is seeking approval in principle for the development proposals. Together, the description of development, Design and Access Statement (DAS) and other supporting documents describe the nature and content of the development proposed.

1.3.2 Details of the parameters of the development for which outline planning permission is sought are included within the DAS, ensuring that an appropriate level of information is provided on the scale, nature and general arrangement of the development proposed at the outset.

1.3.3 The following documents have been submitted in support of the planning application:

- Location Plan
- Development Framework (GM10710-012)
- Design and Access Statement
- Landscape and Visual Appraisal
- Planning Statement
- Socio economic report
- Skills and Employment Assessment
- Transport Assessment (Access Plan included in TA – drawing P19105-00-03)
- Travel Plan
- Enhanced Ecology Appraisal
- Best and Most Versatile Agricultural Land report
- Arboricultural Impact Assessment
- Phase 1 Geo Environmental Report
- Flood Risk Assessment
- Foul Drainage Analysis
- Noise Assessment
- Air Quality Assessment
- Heritage Statement
- Geophysical Survey
- Odour Assessment
- Cordon Sanitaire report
- Utilities Statement
- Statement of Community Involvement

1.3.4 The information contained within the application documents are summarised in Section 3 and provides the framework for future detailed Reserved Matter planning applications.

- 1.3.5 This Planning Statement explains why development is needed in this location and the significant social, environmental and economic benefits that the proposal will bring to the area. It also confirms, drawing on the supporting technical information, that no significant and demonstrable adverse impacts would arise as a consequence of the development, to outweigh these benefits.
- 1.3.6 The Statement further explains the policy context and how the proposed development complies with the Framework and why it is appropriate to bring forward development now at this site.
- 1.3.7 This Statement is one of a suite of documents submitted to support this application and comprehensively demonstrates the suitability and sustainability of the site for development, as proposed.

1.4 The Proposal

- 1.4.1 The drawings submitted as part of this outline planning application for approval are:
- Site Location Plan (Drawing Number: GM10710-020)
 - Access Plan (Drawing Number: P19105-00-03)
- 1.4.2 The application proposal includes the following:
- Up to 245 residential dwellings (including 20% affordable housing delivered in accordance with current adopted planning policy);
 - Structural landscape planting and the retention and positive management of key landscape features, retaining the open setting of the public right of way along the site's eastern green corridor;
 - 4.85 ha of formal and informal open space, including two play areas (totalling 39.7% of the gross site outline application area);
 - Fully integrated drainage solution utilising existing and proposed drainage basins
 - New access arrangements including a footway and highway improvements to Hempsted Lane; and

- A comprehensive trim trail track for communal use.

1.4.3 It is proposed that the site will be accessed from Hempsted Lane, via a simple priority junction. It has been confirmed that the required visibility splays can be achieved and that the site access junction will operate comfortably within capacity in both the morning and evening peak periods with the proposed development traffic as demonstrated by the Transport Assessment prepared by Stirling Maynard.

1.4.4 A range of densities and house types are proposed to meet local need. 20% of the units would be affordable in order to meet the requirement of current adopted local planning policy. Affordable housing provision will be secured by a Section 106 Agreement.

1.4.5 The illustrative Development Framework Plan for the site demonstrates how the built development will be set within a framework of open space and green infrastructure. The green space will include a formal locally equipped children's play area (LEAP), as well as a formal neighbourhood equipped play area (NEAP), as well as informal open space. The proposal seeks to retain existing landscape features; the existing hedgerows are maintained where possible and any loss will be mitigated elsewhere on site. The illustrative Development Framework Plan incorporates these elements within a strategic landscape framework.

1.5 EIA Screening

1.5.1 As the application proposals are for urban development on a site of more than 0.5 hectares, the proposals fall under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017. Such projects only require an EIA if the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

1.5.2 The Local Planning Authority will be required to screen the proposals as part of its legal requirements however the applicant does not consider that an Environmental Statement is required. An EIA screening letter is provided along with this application.

1.6 Planning History

1.6.1 The site has no relevant past planning applications.

2 THE NATIONAL HOUSING CRISIS

2.1 Introduction

2.1.1 This section of the Planning Statement will set out the context to the national imperative to boost significantly the supply of housing, the response required of Gloucester City Council, in collaboration with Cheltenham and Tewkesbury Borough Councils, and the observed effects on affordability in the City Council area

2.2 National Delivery of Housing

2.2.1 It is widely acknowledged at all levels that there is a housing crisis in this country, which has arisen as a direct consequence of too few houses being completed to keep pace with a growing population and household formation rates.

2.2.2 The solution to address this pressing national issue is a sum of the individual parts, i.e. every local authority must ensure that a five year supply of housing is achieved urgently against up to date, objective assessments of their needs.

2.2.3 The House of Lords Select Committee on Economic Affairs said:

To address the housing crisis at least 300,000 new homes are needed annually for the foreseeable future. One million homes by 2020 will not be enough.¹

2.2.4 In recognition of the national housing crisis, the government responded in the 2017 Autumn budget with a commitment to deliver 300,000 new homes a year. Since the start of the financial crisis, delivery of new homes has not yet come close to delivering this nationally recognised need:

Year	Net Additional Dwellings²
2007/08	223,534
2008/09	182,767
2009/10	144,870
2010/11	137,394

¹ House of Lords Select Committee on Economic Affairs 1st Report of Session 2016–17 HL Paper 20 Building more homes

² Ministry of Housing Communities & Local Government *Table 122: housing supply; net additional dwellings, by local authority district, England 2001-02 to 2017-18* (Accessed January 2019)

2011/12	134,896
2012/13	124,722
2013/14	136,605
2014/15	170,693
2015/16	189,645
2016/17	217,345
2017/18	222,194

- 2.2.5 Having regard to the evidence on past completions, it is self-evident that a significant step change is required in the delivery of new homes, in order to get anywhere close to meeting requirements and preventing the housing crisis from being exacerbated further.
- 2.2.6 In order to reach the government’s targets, Kit Malthouse MP, then Minister of State for Housing, Communities and Local Government said in *The Times*, “If we want to achieve 300,000 homes a year, we need to have one million homes in production and four to five million in planning.”³
- 2.2.7 In 2017 consultancy Lichfield also identified that in order to meet the 300,000 a year delivery target, a constant stock of between 900,000 and 1.1 million implementable planning permissions would be required⁴.
- 2.2.8 This application therefore responds to the national housing crisis and the need to grant additional planning permissions in order to meet the government’s objectives. In addition, as will be explained later in this Planning Statement, this document responds to the local housing issues in Gloucester which are contributing to the problem overall.

2.3 The Local Authority Position

- 2.3.1 One effect of the national housing crisis is a profound effect on affordability. The following information, based on DCLG Live tables, showcases the need for further

³ Anne Ashworth (2019) ‘Kit Malthouse: It’s time to ‘keep calm and keep building’’, *The Times*, 4th January 2019

⁴ Nathaniel Lichfield and Partners (2017) *Stock and Flow, Planning Permissions and Housing Output*, NLP, January 2017

affordable housing in Gloucester City. This has led to the increasing unaffordability of housing in the City Council area since the start of the Local Plan period in 2011:

Year	2011	2012	2013	2014	2015	2016	2017	2018
Affordability Ratio	5.53	5.30	5.49	5.60	6.06	6.24	6.26	6.68

- 2.3.2 Mortgage lenders typically offer loan to income ratios from 3.25 annual salary up to a cap at around 4.5 times annual salary. More often than not this requires a deposit and loan to value (LTV) ratio of 95%.
- 2.3.3 As can be seen from the data, affordability ratios in Gloucester consistently sit significantly higher than the 4.5 ratio cap and have continued to rise into recent years. Affordability remains a chronic issue across Gloucester and the average house price for the area is substantially beyond the accepted affordability ratio.
- 2.3.4 It is also true that there has been a failure to deliver the 152 affordable houses required in the City Area each year dwellings against the 3,039 identified within the Gloucestershire Local Housing Needs Assessment in October 2019.
- 2.3.5 The reality is therefore that those most in need in Gloucester City Area are unable to afford to buy their own homes.

3 SITE AND LOCATIONAL SUSTAINABILITY

3.1 Site Location

- 3.1.1 The 12.22 ha site lies adjacent to the existing residential development in Hempsted, an area encapsulated within the settlement boundary of the City of Gloucester.
- 3.1.2 The settlement lies approximately 3.2 km from the centre of Gloucester City, and is also within range of Cheltenham and Stroud, which lie approximately 14km and 13km away respectively.
- 3.1.3 The site is in a sustainable location and will be able to make a valuable contribution to the supply of housing in Gloucester.

3.2 Suitability of Location

- 3.2.1 The application site comprises three fields in agricultural use. The site is well contained by existing hedgerows and trees, which obscure the site from the nearby roadways on the west, east and northern boundaries, as well as existing homes to the north. South of the site is further agricultural land.
- 3.2.2 The site is well related to the settlement, with a public right of way passing through the eastern portion of the site.
- 3.2.3 The development would be a logical extension to Hempsted and the Gloucester area. It would not result in built form extending further west than the existing settlement edge.
- 3.2.4 The City of Gloucester is the primary location for development within the authority. It is the major settlement for the area and as such is considered a suitable location for development.
- 3.2.5 The site access is situated within approximately 4km of the centre of Gloucester giving the site access to existing shops, services and employment opportunities, by car, foot or bicycle, throughout the City of Gloucester area. The site's proximity to key services and facilities is shown on page 11 of the Design and Access Statement (DAS) and details of facilities are shown within the Transport Assessment in Section 5.1 which illustrates all amenities are within recommended guideline walking distances.
- 3.2.6 Growth at Hempsted, and in turn the City of Gloucester, will both support, and be supported by, a range of services and facilities that are within easy walking and cycling distance of the site. These include bus routes; local primary school and high school; post office; and a major hospital. The City of Gloucester also contains an abundance of job opportunities. To the site's north the centre of Gloucester hosts a significant number of office-based businesses, while to the site's east and further south, a number of industrial estates provide local avenues into industry.

- 3.2.7 Two bus stops lie within close proximity to the proposed access to the site, at 200m and 300m respectively. Both the 12 and 66 bus routes run between the centre of Gloucester and into Quedgeley to the south, with both services running from early in the morning until early evening. The 12-bus route also provides Sunday services to enhance local public transport connections.
- 3.2.8 The site is connected to Gloucester train station along bus route 12. This station provides access to a range of neighbouring settlements, with Bristol, Cheltenham and Cardiff, amongst others. Bus route 12 is a well-serviced route, running from 06:12 for first pickup, until 23:10 for final return. The journey to the station only takes 10 minutes, and then each of the destinations listed here can be reached in around an hour each direction.
- 3.2.9 Rail travel is therefore a convenient and accessible option of transport that enables access to a range of regionally strategic locations and major settlements.
- 3.2.10 The following is relevant in terms of the site's suitability and sustainability for development:
- The site is well contained within the landscape and important trees and other landscape features are retained;
 - The local highway network has capacity to accommodate the additional traffic associated with the development, without adverse impact;
 - The site comprises land in agricultural use, but its usefulness for agricultural purposes is limited and its loss would not be significant in Framework terms (Framework 170);
 - The site has a low ecological value on the basis of the evidence submitted with the application (Preliminary Ecological Appraisal Report prepared by Wardell Armstrong). The loss of habitat would therefore not be significant and mitigation and net biodiversity gains can be readily achieved;
 - The site can demonstrate that effects of odour from Netheridge works to the south is not significant, with full analysis and breakdown of the considerations involved prepared in both the Odour Assessment Report

by Wardell Armstrong and addendum Cordon Sanitaire Report prepared by BLBB.

- The parcel of the site proposed for development falls within the EA Flood Risk Zone 1 (i.e. land assessed as having a less than 1 in 1,000 annual probability, or <0.1% chance of flooding);
- There are no designated heritage assets within or immediately adjacent to the site, and the development is not considered to affect the setting of any listed buildings.

3.2.11 The DAS prepared by Wardell Armstrong and submitted in support of the application sets out how the site can accommodate the quantum of development proposed in a manner which reflects the local landscape character and the edge of Gloucester City.

3.2.12 In summary the application site presents an opportunity for the sustainable growth of Hempsted and the wider Gloucester area:

- The land to which the development proposals relate is not of high environmental value.
- The site is suitable for residential development in terms of its general location and characteristics.
- There are opportunities through development to improve the environmental conditions of the area.

4 THE DEVELOPMENT PLAN

4.1 Introduction

4.1.1 At the time of writing, the adopted Development Plan applicable to the site comprises:

- The Cheltenham, Gloucester and Tewkesbury Joint Core Strategy, adopted 11th December 2017;
- Saved Policies from both the 1983 Gloucester Local and 2002 Revised Deposit Local Plan;

4.1.2 As the site lies outside the City of Gloucester administrative boundary, it is accepted that the proposed development is in conflict with certain development policies in the Joint Core Strategy. However, it is the case that material considerations exist, particularly the lack of demonstrable delivery for housing in Gloucester over the entire plan period, and the argument in regard to the deliverability of the council's claimed housing land supply. These considerations provide sufficient reason for weight to development plan conflicts to be considered as a limited, and the assistance in fulfilment of the Joint Core Strategy's policy objectives by this scheme to be given significant weight.

4.1.3 This section describes the adopted and emerging Development Plan for the site and considers the relevance and weight that should be attributed to the policies contained within it.

4.2 The Development Plan: Weighting

4.2.1 Section 38(6) of the Town and Country Planning and Compulsory Purchase Act 2004 places a statutory duty on local planning authorities to determine planning applications in accordance with the development plan unless material planning considerations indicate otherwise. Section 39 of the Act requires decision makers to exercise their functions with the objective of contributing to the achievement of sustainable development.

4.2.2 The Framework is a material planning consideration but does not change the statutory status of the Development Plan as the starting point for decision making. Paragraphs 2 and 12 of the Framework confirm:

2. **Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.**
12. **The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.**

4.2.3 Further, in determining the weight to relevant policies the guidance at paragraph 213 of the Framework confirms:

“...existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).”

4.2.4 The planning application should be considered in this context.

4.3 Five-Year Housing Land Supply

4.3.1 The supply of available and deliverable sites for housing in Gloucester is a material consideration in determining the weight to relevant policies for the supply of housing. Paragraph 11 and footnote 7 of the Framework states:

“Plans and decisions should apply a presumption in favour of sustainable development.

...

For decision-taking this means:

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

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁷, 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; 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."

...

"This includes, for applications involving the provision of housing, situations 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. Transitional arrangements for the Housing Delivery Test are set out in Annex 1."

- 4.3.2 The Framework requires local planning authorities (LPAs) ensure a continued supply of land to meet five years' worth of housing requirements, with a delivery buffer of either 5%, 10% or 20% (moved forward from later in the plan period) depending on past performance. Local authorities should also make every effort to redress previous underperformance within the immediate 5-year period (commonly referred to as the 'Sedgefield Approach') and the delivery buffer should be applied to both the requirement and the accrued backlog.
- 4.3.3 It is however understood that it has been deemed acceptable for the Joint Authorities of Cheltenham, Gloucester and Tewkesbury to address housing delivery shortfalls over the entire plan period (referred to as the 'Liverpool Approach') by the Inspector during the final report on the Joint Core Strategy.

- 4.3.4 The Liverpool Approach is also what forms the basis of Gloucester's claims in regard to the current housing land supply for the authority. This was assessed to be 5.4 years in the June 2019 Housing Monitoring Report.
- 4.3.5 Gladman dispute this assessment of Gloucester's land supply as being unrealistic as to the expected delivery time for a number of sites included within the trajectory figures. Primarily, it is noted that 972 dwellings are included within the five-year trajectory assessment from potential allocations within the emerging Gloucester City Plan.
- 4.3.6 The Framework updates the definition for 'deliverable' in the Annex 2 Glossary section of the document. This is considered a 'closed list', meaning that sites that do not specifically fit within the listed criteria posed in the NPPF should not be considered as fulfilling the requirements of the definition in question. In this case, sites that do not fulfil one of the listed criteria for deliverability within the NPPF Annex Glossary, should not be considered deliverable until such time that they fit within the relevant criteria.
- 4.3.7 For the purposes of the assessment of Gloucester City Council's five-year housing land supply, the inclusion of emerging allocations, none of which have received planning approval, is not deemed to be acceptable under the guidance of the 2019 National Planning Policy Framework, as emerging allocations are not included within the closed list of what can be considered deliverable sites in the Annex 2 Glossary section.
- 4.3.8 With the removal of these emerging allocations, and the reassessment of several other sites within Gloucester City Council's land supply that also fail to reach the standard of deliverability set by the NPPF, it is considered that the Council is unable to demonstrate a five year housing land supply.
- 4.3.9 Under these circumstances, Gloucester City Council cannot demonstrate an adequate supply of housing for the upcoming five-year period, and this situation would not be rectified simply with the adoption of the Gloucester City Plan. The council must make further efforts to assess and approve sites within the authority

area that can demonstrate they are sustainable developments, and that which once approved can be made quickly available for construction and development.

- 4.3.10 The market and affordable homes proposed on this site could be made immediately available to assist with Gloucester City Council's housing figures, and would make a significant contribution in resolving the deficit found in the council's housing land supply. This consideration should be given significant weight during the determining of this application.

4.4 Gloucester, Cheltenham and Tewkesbury Joint Core Strategy

- 4.4.1 The Joint Core Strategy was adopted on 11th December 2017 to guide development across the three authorities over the period extending from 2011 to 2031. The development proposals have therefore been assessed against relevant policies within the Joint Core Strategy, with the policies of significance, and their relation to the development, summarised below.

- 4.4.2 **Policy SP1: The Need for New Development** sets out each Authority's overall housing requirements, with **Policy SP2: Distribution of New Development** and **Policy SD10: Residential Development** providing a more specific breakdown on the allocated housing figures for the major settlements, rural service centres and service villages, and the criterion for housing delivery. It should be noted that the 14,359 total homes, and the 13,287 homes allocated to the City of Gloucester are both expressed as **minimum** requirement of delivery.

- 4.4.3 While this proposal conflicts with Section 7 of Policy SP2 and Section 4 of Policy SD10, as it is outside the administrative boundary of Gloucester and has not received allocation within the Joint Core Strategy or other development documents, Gladman contend this should only be given limited weight. The proposed development is compliant with all other policies within the development documents and represents a logical extension to the built form.

- 4.4.4 Furthermore, Gladman argue that the lack of a substantive five-year housing land supply and a lack of housing to cover the entire Joint Core Strategy plan period necessitate the due consideration of further development in the Gloucester City

area that has not yet been allocated and included in the current development plan. Policies that seek to restrict development or maintain existing administrative boundaries should only be given limited weight until such time as the Authority can again adequately demonstrate full fulfilment of plan period delivery figures and sufficient five-year housing land supply.

- 4.4.5 **Policy SD3: Sustainable Design and Construction** and **Policy SD4: Design Requirements** outline the ways in which development within the Joint Authority area will be expected to contribute towards sustainability through incorporated principles and the submission of relevant documentation. This proposal demonstrates how these design principles can be met in principle during development. The details as to the specifics of these elements of development can be agreed in full during the Reserved Matters stage of planning application.
- 4.4.6 **Policy SD6: Landscape** sets out that development must seek to protect landscape character for the benefit of economic, environmental and social well-being, as well as its own intrinsic beauty. All proposals will be expected to demonstrate how landscape character will be enhanced or protected.
- 4.4.7 In giving due regard to Policy SD6 this proposal has been submitted with a Landscape and Visual Impact Assessment. This provides certainty that the landscape and current local urban character can be retained and preserved during the course of development of this site. Equally, this proposal integrates green infrastructure enhancements that demonstrate the green character of this site can be improved during development.
- 4.4.8 **Policy SD11: Housing Mix and Standards** sets out how development will be expected to accommodate for an appropriate mix of dwelling sizes, types and tenures, in such a manner that the housing needs of the local area will be addressed, as set out in the most recent local housing evidence base.
- 4.4.9 The site can be shown to support a variety of housing mixes, types and sizes, with the Socio-economic Statement submitted alongside this application providing a full breakdown in principle. The specific mix will be determined during the

Reserved Matters stage of development, however Gladman is committed to upholding the affordable housing requirement set out by Gloucester City Council and will comply to the full 20% affordable housing being sought through **Policy SD12: Affordable Housing**.

4.4.10 **Policy INF2: Flood Risk Management** sets out the elements of flood risk management and further strategies that should be considered by all development proposals within flood risk zones. Priority should always be given to development within Flood Zone 1, if flood zone development is to come forward. Development in either Flood Zone 2 or 3 will only be considered once the exception test has been applied. Irrespective of any flood zone, all development should prove it will be safe, without increasing flood risk elsewhere.

4.4.11 This proposal situates all the proposed residential development within Flood Zone 1. Through the course of this proposal's Flood Risk Assessment prepared by Enzygo, it is demonstrated that risk of flooding is considered negligible with no increase in flooding risk elsewhere.

4.5 Saved Policies: 2002 Gloucester City Council Revised Deposit Local Plan

4.5.1 The Second Stage Deposit City of Gloucester Local Plan was adopted to assist development management for the area in 2002. In light of the Joint Core Strategy and the adoption of the National Planning Policy Framework, the policies of the Deposit Local Plan were reviewed. A number of policies within the document were considered to be a material consideration for plan decision-making, and as such should continue to be attributed weight during the planning process.

4.5.2 Relevant saved policies within the Deposit Local Plan have therefore been taken into consideration during the process of development of this proposal. The policies of significance and their relation to this proposal have been summarised below.

4.5.3 **Policy FRP.12 Sewage Works Cordon Sanitaire** sets out that any development within the area designated under the cordon sanitaire policy on the proposals map

will not be permitted should there be an adverse effect due to the smell from either Netheridge or Longford Sewage Works.

- 4.5.4 It has been demonstrated through both the Odour Assessment Report prepared by Wardell Armstrong, as well as the Cordon Sanitaire Addendum Report prepared by BLBB that while the site is within the Cordon Sanitaire designated area for Netheridge sewage works, there is no significant odour present on-site, either during the course of investigation or that would be otherwise expected under varying weather circumstances.
- 4.5.5 The proposal therefore overcomes the restriction to development put into place under Policy FRP.12, as no adverse effect due to smell will be present across the site area.
- 4.5.6 **Policy BE.2: Views and Skyline** sets out that all proposed development should respect the current city skyline and maintain important views and vistas of the nearby countryside from within the city.
- 4.5.7 This policy has been taken into account in tandem with Policy SD6 of the Joint Core Strategy during the preparation of a Landscape and Visual Impact Assessment for this proposal. This determines that the views of the countryside from within the city will not be adversely impacted due to development at this site, in short due to present obscurement which will be maintained by the proposed development.
- 4.5.8 The proposals are therefore compliant with the requirements of Policy BE.2, through the same means as it demonstrates compliance with Policy SD6.
- 4.5.9 **Policies OS.2: Public Open Space Standard for Residential Development** and **OS.3: New Housing and Public Open Space** provide guidance on the appropriate design and levels of provision for public open space and recreation areas within Gloucester City Council area. Development is expected to provide 2.8 hectares minimum per 1,000 people at full occupancy, as well as facilities for play, sport and passive recreation to the Council standard.

- 4.5.10 The applicant has given these policies due consideration during the course of preparing the development design in principle. The site is maintaining 4.81 hectares of public open space, representing approximately 40% of the total site area. It will also provide a local equipped area for play, and a neighbourhood equipped area for play for use by existing and future residents of the area. This level of provision noticeably exceeds the requirements of these policies and will bring significant usable open space to the area.
- 4.5.11 The proposals are therefore fully compliant with the requirements of Policies OS.2, OS.3.
- 4.5.12 **Policy A.1: New Housing and Allotments** sets out that for sites with 30 or more dwellings proposed, provision of allotments will be expected at 0.2 hectares per 1,000 people at full occupancy. It is specified that should allotment provision on site not be feasible for the proposal, then off-site allotment contributions will be considered acceptable by Gloucester City Council.
- 4.5.13 While no allotments are currently proposed on-site for this proposal. Gladman is willing to discuss a CIL compliant financial contribution towards allotment provision during the course of this application.

4.6 The Emerging Development Plan

Gloucester City Plan

- 4.6.1 Gloucester City Council is in the midst of preparing the Gloucester City Plan, which is set to govern development for the authority area alongside the Joint Core Strategy. It is expected to cover the same period as the Joint Core Strategy, from 2011 to 2031.
- 4.6.2 A Local Development Scheme was prepared and published in October 2017. At this time, it was predicted that the Gloucester City Plan would be adopted in Winter 2019/Spring 2020. Progress on the City Plan however has been slower than expected, with a Pre-submission version of the Gloucester City Plan having only been published for consultation in early 2020.

- 4.6.3 Given the current position of the Gloucester City Plan, as it has not been formally submitted for further consultation and review by the Planning Inspectorate, the Local Plan is still at the early stages of preparation.
- 4.6.4 Furthermore, while the Gloucester City Plan version submitted for consultation allocates further locations than those proposed within the Joint Core Strategy, the proposed figures in their entirety still fail to cover Gloucester's shortfall for the Joint Core Strategy plan period. The plan is therefore likely to need to identify further sustainable sites for development prior to formal adoption. Doing so is also likely to increase the time before the City Plan is ready for submission and potential adoption.
- 4.6.5 As such, the time between now and the adoption of the Gloucester City Plan should be considered substantial. Therefore, limited weight should be given to the policies and guidance within this emerging document in accordance with paragraph 48 of the NPPF.

Joint Core Strategy Review

- 4.6.6 Following the adoption of the Joint Core Strategy by Tewkesbury, Cheltenham and Gloucester, a review of the Core Strategy has been agreed in order to ensure that the plan can fully support development in the area for the foreseeable future.
- 4.6.7 A consultation ran through late 2018 and into early 2019 presenting Issues and Options as to how the plan could develop going forward. Since this consultation concluded, no further updates as to the progress of the Core Strategy Review have been publicly provided.
- 4.6.8 It should also be noted that these initial Issues and Options did not address the lack of housing identified within the Core Strategy for Gloucester City, which was notably required to be part of a review of the Core Strategy under Policy REV1.
- 4.6.9 Notwithstanding this, significant work must still be undertaken before the review of the Core Strategy will reach adoption. As such, only very limited weight can be afforded to the plan at this time.

4.7 Summary of the Development Plan

- 4.7.1 In the light of the above, the development proposal is compliant with the technical policies that govern residential development. Any restrictions on development can be overcome through either appropriate mitigation strategies, and the potential adverse impacts are not sufficient to lead to significant adverse effects to the area.
- 4.7.2 Where a conflict arises, those policies are restrictive of development under the assumption that the authority has a substantial housing land supply for the upcoming five-year period. Gladman contends that the provided figure of 5.4 years is an overestimate of the deliverable figures for Gloucester City, in part due to its reliance on emerging City Plan allocations, contrary to the guidance of Annex 2 Glossary in the National Planning Policy Framework. Furthermore, Gloucester City Council continues to have a shortfall in housing for the plan period, as noted during the final inspector's report for the Joint Core Strategy.
- 4.7.3 Until such time as the Authority can again adequately demonstrate full fulfilment of plan period delivery figures and sufficient five-year housing land supply, policies that seek to restrict development or maintain existing administrative boundaries should only be given limited weight.
- 4.7.4 The application therefore should be approved without delay.

5 SUSTAINABLE DEVELOPMENT: THE NATIONAL PLANNING POLICY FRAMEWORK

5.1 Introduction

5.1.1 The government published a revised Framework in February 2019.

5.1.2 This section of the Planning Statement sets out why the planning application meets with the objectives of the Framework in delivering sustainable development.

5.2 The Presumption in Favour of Sustainable Development

5.2.1 At the heart of the Framework is the ‘presumption in favour of sustainable development’ (paragraph 10). For decision-taking this means approving development where it accords with an up-to-date development plan, or where there are no relevant development plan policies or where the policies which are most important for determining the application are out-of-date, granting permission unless adverse impacts would significantly and demonstrably outweigh the benefits, or policies in the Framework indicate development should be restricted (see paragraph 11).

5.2.2 The relevant technical reports that accompany this planning application demonstrate that there are no unacceptable adverse impacts that would significantly and demonstrably outweigh the benefits associated with the proposals. Further, the application site is not the subject of any of the designations cited within footnote 6 of the Framework and therefore policies do not apply which indicate the presumption should be disapplied.

5.2.3 This section describes how the development proposals meet the relevant objectives of the Framework.

5.1 Building a Strong and Competitive Economy

5.1.1 The Framework is clear that the government is committed to delivering sustainable economic growth identifying that planning policies should, “positively and proactively encourage sustainable economic growth.” (paragraph 81).

5.1.2 Housing development is a key component of economic growth and this is fully recognised in Government policy and more recently the White Paper – Fixing our broken housing market (2017), which states on page 15:

“If we fail to build more homes, it will get ever harder for ordinary working people to afford a roof over their head, and the damage to the wider economy will get worse.”

5.1.3 Through the development of the site a significant amount of investment will be made to the area in terms of the construction value of the project and associated spend during the construction period. The construction industry and house building in particular make an important contribution to both the local and national economy in terms of job creation. The accompanying Socio-economic Sustainability Statement estimates the following key benefits arising from the proposal:

- Construction spend - £25.9 million
- GVA over the build period - £10.1 million
- Resident annual expenditure - £8.01 million
- Council tax - £4.1 million over 10 years
- New Homes Bonus - £1.4 million over a four-year period

5.1.4 The provision of quality housing in Gloucester is central to the achievement of sustainable economic growth across the entire Gloucester City authority and is fully supported by the requirements and advice of the Framework; indeed, paragraph 80 is clear that, “significant weight should be placed on the need to support economic growth through the planning system”.

5.2 Promoting Sustainable Transport

5.2.1 At paragraph 102, the Framework requires LPAs to consider transport issues from the earliest stages of the plan-making process and development proposals, encouraging:

“...opportunities to promote walking, cycling and public transport use...”

5.2.2 At paragraph 103, the Framework requires significant development to:

“...be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”

5.2.3 Gloucester has a wide range of services and facilities within walking and cycling distance of the site. Further locations are easily reached via existing bus and rail routes within proximity to the site.

5.2.4 To support the application a Transport Assessment (TA) has been undertaken which confirms that the site is well located in relation to sustainable transport options and is well positioned in relation to the local and strategic highway network. It concludes that no significant impacts, in terms of highways capacity, highways safety or site access, will come about due to development at this location.

5.3 Delivering a Wide Choice of High Quality Homes

The Need for Market and Affordable Housing

5.3.1 There is a wealth of evidence from figures at the highest levels of the Government, the Bank of England and internationally, within the European Commission and International Monetary Fund, which demonstrate that there is a consistent and pressing requirement to build more homes to meet the significant level of unmet need, particularly for homes that are affordable. In the foreword to the White Paper ‘Fixing the Broken Housing Market’, former Prime Minister Theresa May stated:

“Our broken housing market is one of the greatest barriers to progress in Britain today. Whether buying or renting, the fact is that housing is increasingly unaffordable – particularly for ordinary working class people who are struggling to get by.

Today the average house costs almost eight times average earnings – an all-time record. As a result it is difficult to get on the housing ladder, and the proportion of people living in the private rented sector has doubled since 2000.”

5.3.2 The government outlined its aim to build 300,000 homes per year in the Autumn Budget 2017. Delivery of this site will contribute to this delivering the housing the country needs.

5.3.3 In addition to a pressing need for new market homes in Gloucester, there is a significant need for affordable housing, as outlined in the Gloucestershire Local Housing Needs Assessment published in October 2019.

5.3.4 This assessment makes clear that for the joint Gloucestershire authorities:

“Given that the need for affordable housing and affordable homeownership in particular is very high, it is necessary to consider how this need can be addressed within the overall need established.”⁵

5.3.5 The affordable housing need of Gloucester is particularly acute amongst the Gloucestershire authorities. Gloucester represents the authority with the highest affordable housing delivery figure identified in the Local Housing Needs Assessment, with an affordable housing need of 3,039 dwellings. As such the necessity for suitable provisions, and the importance of the quoted section referenced above, should be considered critically important for Gloucester.

5.3.6 The UK has a persistent problem with inadequate housing supply, which has led to low income and middle-income families being priced out of the housing market. National Government recognise that house price inflation is getting to dangerous levels and that building new homes is necessary in order to address this issue. The delivery of 20% affordable homes should be given significant weight.

Ensuring Choice in the Competition for Land

5.3.7 The Framework sets out the Government’s key housing objective, which is, “to boost significantly the supply of housing”. Paragraph 73 sets out how LPAs should achieve this boost in the supply of housing, including a requirement to provide a delivery buffer of 5%, 10% or 20% to ensure choice and competition in the market for land. Gloucester City is currently considered to be under a 5% buffer, given the results of the 2019 Housing Delivery Test.

5.3.8 The proposals entirely accord with this national policy objective in so far as the application will deliver new housing development which will assist the Council to

⁵ Gloucestershire Local Housing Needs Assessment 2019, Page 66, Para 8.64

contribute towards the central government objective of boosting significantly the supply of housing now.

5.4 Achieving Well-Designed Places

5.4.1 The DAS demonstrates how the scheme will deliver a high quality residential sustainable development. The proposals are based on sound design principles that have taken into account site constraints and opportunities presented by the site.

5.4.2 Whilst design is a matter reserved for future determination, the DAS demonstrates the site could accommodate a scheme that would be in scale and character with its surroundings and Gloucester through delivering dwellings of a suitable size and through utilising materials that reflect the local vernacular. It is demonstrated through the DAS and TA that the site would be accessible to people on foot, cycle and to those with disabilities. The illustrative master plan seeks to create an attractive place that responds to the attributes of the site and the local context.

5.4.3 The development has been designed taking into account the recommendations of the Landscape and Visual Assessment (LVA). The green infrastructure within the built development will sit as an integral part of the framework and is key in creating an accessible, open and engaging place within which to live. The proposal provides a strong green framework comprising;

- The creation of a 4.81Ha of Green Infrastructure comprising a variety of potential habitats and open space;
- Inclusion of 0.87Ha of incidental greenspace and habitat enhancement space; and
- Reinforcement of existing hedgerows, as well as the inclusion of additional hedgerows and trees, around and within the site to improve the quality and connectivity of habitat.

5.5 Conserving and Enhancing the Natural Environment

5.5.1 The site is not subject to any landscape quality designation such as National Parks, Areas of Outstanding Natural Beauty (AONBs), or additional local landscape

conservation areas. Neither the site, nor the immediate landscape, contain any rare or unusual landscape features and so the LVA prepared for the application concludes the site does not comprise a valued landscape.

5.5.2 The LVA also assesses the visual impact of developing at this location. While it is recognised that development of this kind will result in a change to the character of the application site, the LVA concludes that there no unacceptable or overriding landscape or visual effects that would adversely impact the surrounding area. This is due to natural visual limitations provided by the naturally gentle topography and the screening effects of existing field boundary vegetation. The proposals aim to retain notable existing landscape features and to enhance the existing landscape area.

5.5.3 The Ecological Assessment confirms that the proposal is unlikely to have any significant effect on any statutory designated sites, as the only designated site in a 2km radius of the site is 1.7km to the north, therefore no adverse effects on designated sites are expected from development of this site.

5.5.4 In accordance with the required guidance, the Ecological Appraisal is able to demonstrate that a net gain in biodiversity as a result of the development is feasible and attainable for this site, through the creation and extensions of the nearby wildlife corridors, as well as general enhancements further outlined within the Ecological Appraisal.

5.6 Meeting the Challenge of Climate Change

5.6.1 Paragraph 148 of the Framework requires the planning system to “help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions...” The application proposal meets these criteria as it will be delivered to the relevant Building Regulations or equivalent standard applicable at the time of permission.

5.7 Conserving and Enhancing the Historic environment

- 5.7.1 Section 16 of the Framework provides policy guidance on the conservation and investigation of heritage assets. The Historic Environment Statement includes an assessment of both potential impact on nearby heritage assets as a result of development of this site, as well as investigation into the potential presence of archaeological remains within the boundaries of the area.
- 5.7.2 The statement concludes that there is no evidence to indicate the presence of archaeological remains which would be greater than low importance, and that development of this site would have no direct or indirect impact on designated heritage assets in the nearby Hempsted Conservation Area.
- 5.7.3 As such there is no expectation of harm to historic or conservation assets in the immediate area that would preclude development in this location.

5.8 Summary

- 5.8.1 From the above, it is clear that the application proposal complies with relevant provisions of the Framework. Accordingly, it can reasonably be concluded that the proposal is also in compliance with the broad planning objectives of the Framework.
- 5.8.2 The assessment against the relevant policies does not indicate any circumstances under which permission should be restricted which might result in the disapplication of the presumption in favour of sustainable development.

6 Planning Balance and Conclusions

6.1 Summary of Case and Identified Benefits and Harm

- 6.1.1 The outline planning application is made in the context of the government's requirement to boost housing land supply and the presumption in favour of sustainable development. The proposal responds positively to the identified lack of a five-year housing land supply after assessment of Gloucester's current land supply position and the identified needs for both market and affordable housing in the Authority, as shown in the final inspector's report for the adoption of the 2017 Joint Core Strategy.
- 6.1.2 The positive determination of the application in accordance with Framework paragraph 11 is not reliant on the absence of a five-year housing land supply or any established shortfall in housing delivery within the authority area. Nevertheless, the current land supply figures rely on the inclusion of a large quantity of potential allocations under review within the Pre-submission Gloucester City Plan, which are not considered to be deliverable, and therefore relevant for the purposes of determining housing delivery for the next five years, in the National Planning Policy Framework's Annex 2 Glossary definition of deliverability. With the removal of these figures, Gloucester is unable to demonstrate a five year housing land supply. Without due consideration to further avenues of sustainable development within the authority area, this is not a situation that can be expected to be corrected quickly.
- 6.1.3 Furthermore, Gloucester continues to have a shortfall of housing allocated to meet its needs over the whole plan period. Even if the current proposed allocations in the draft of the Gloucester City Plan were adopted in full, this would still not cover all of the shortfall in housing identified by the Inspector in their review of the Joint Core Strategy.
- 6.1.4 This proposal would be deliverable in the short term and increase the supply and choice of housing for the City of Gloucester, which is designated to deliver the majority of housing under the Joint Core Strategy policy provisions. It would

contribute towards economic growth and have wider social benefits to the local community, meeting a range of housing requirements, including affordable housing. The principles outlined within the DAS would secure a high quality scheme.

- 6.1.5 The supporting material, assessments and reports demonstrate that there are no technical or environmental constraints that would preclude the development of this site, subject to planning conditions and/or obligations. Gladman is willing to enter into constructive dialogue with the Council to agree a list of conditions and Section 106 Heads of Terms that are necessary to make the development acceptable in planning terms. In order to commence this process, a list of suggested Heads of Terms for a Section 106 Agreement is enclosed at Appendix 1.
- 6.1.6 As with any greenfield site, the development will introduce changes to the area and some urbanising effects. Care has been taken to ensure that the perceived impact on Hempsted, as well as the wider City of Gloucester, is minimised and acceptable, through careful design and siting, the provision of extensive open space and green infrastructure improvements both along the site boundary as well as within the site itself.
- 6.1.7 The development of the site, as proposed, would be both suitable and sustainable, and there is justification to grant planning permission in accordance with the presumption in favour of sustainable development.
- 6.1.8 The relevant material considerations in this case are:
- Gloucester City Council's claim of a five-year land supply is contested by Gladman
 - The Authority continues to operate with an identified housing shortfall for the entirety of the Joint Core Strategy plan period, extending to 2031. Policy REV1 required Gloucester to have begun an immediate review to identify delivery of this shortfall, however, to date this review is at a very early stage and can only be afforded very limited weight.

- The Gloucester City Plan has still not been submitted for examination and the allocations it proposes have not been reviewed for soundness. As such matters included should be given limited weight.
- The site is suitable for residential development in terms of location and characteristics and it is not of high environmental value;
- The provision of affordable housing, without subsidy, is a significant benefit in circumstances where the Council has identified a shortfall in the affordable delivery figures, leaving people in pressing need of suitable homes.

6.2 Benefits

6.2.1 The table below highlights some of the key benefits arising in respect of the application proposal:

Market Housing	It will help to deliver much needed new, quality, family homes, in a community where people wish to live, in a suitable and sustainable location close to existing public transport, shops, employment opportunities and community services.
Affordable Housing	It will provide a wide range of homes including a policy-compliant provision of affordable housing (20% or up to 49 units) in an area where there is an existing unmet need unlikely to be delivered through alternative means.
Jobs and the Economy	<p>Immediate Impacts</p> <p>The build cost for the development is expected to be around £25.9m. Calculations suggest that this construction expenditure would support around 221 Full Time Equivalent (FTE) construction jobs over the period of the build.</p> <p>The construction of new homes in the proposed development could help to address local unemployment in the industry and provide apprenticeship and training opportunities for young unemployed people.</p> <p>Over the four years following the completion of the development, Gloucester City Council will benefit from circa £1.4m via the New Homes Bonus.</p> <p>Lasting Impacts</p>

	<p>It is anticipated that 298 residents from the new development will be of working age and in employment.</p> <p>Household expenditure from the 245 new homes would be circa £8.01 million per year.</p> <p>The scheme will supply new affordable rented and intermediate housing, helping to address substantial local affordable housing needs by providing opportunities for lower income households to own their own home or to secure rented accommodation.</p>
Protecting and enhancing Vitality and Viability	<p>The new residents will increase demand for and use of local services and businesses and increased spending will help to protect, maintain and enhance the services available and accessible within the city and surrounding area.</p>
Public Open Space and Recreation	<p>It will provide formal and informal public open space and green infrastructure and secure its long-term management for use by the new and existing community.</p> <p>It will improve connectivity and access to public rights of way.</p> <p>It will include both a local equipped area for play, and a neighbourhood equipped area for play on-site.</p>
Environmental Benefits	<p>Biodiversity of the site will be protected, diversified and improved through new hedgerow and tree planting and delivery of new garden spaces and formal and informal green spaces. Overall, the proposal will achieve a net gain in biodiversity.</p>

6.3 Harm

- 6.3.1 The supporting material, assessments and reports demonstrate that there are no unacceptable adverse impacts associated with the scheme.
- 6.3.2 As with any greenfield site, the development will introduce changes to the area and some urbanising effects and it will involve the loss of some agricultural land however, this is to be expected and the LVA demonstrates the scheme can be delivered without unacceptable wider landscape and visual impacts.
- 6.3.3 Under the cordon sanitaire policy, an evaluation of potential odour concerns is required for development at this location. All relevant evidence has been produced

and it can be concluded that no adverse effect from odour will effect development of this site.

- 6.3.4 Despite these changes, significant and demonstrable harm will not arise through development overall as proposed.

6.4 Planning Balance and Conclusions

- 6.4.1 The Framework policies on the delivery of sustainable housing development carry significant weight, and the delivery of the proposed development would support housing and economic development objectives and meet the aims and objectives of sustainable development, securing net gains across all three strands of sustainable development (economic, social and environmental).
- 6.4.2 There are no technical or environmental impacts that would significantly or demonstrably outweigh the substantial benefits of the proposal and specific policies of the Framework and Development Plan do not indicate that development should be restricted.
- 6.4.3 In accordance with paragraph 11 of the Framework, the development proposal clearly constitutes 'sustainable development'.
- 6.4.4 It is clear there are significant material considerations, including the identified housing shortfall in the Gloucester City area and the contestable nature of Gloucester's current housing land supply, meaning that any areas of conflict with the development plan and this proposal should only be given limited weight. This development is poised to deliver much needed housing for Gloucester and can demonstrate technical soundness and a lack of harm for the wider area. The application should therefore be approved without delay.

APPENDIX 1

APPENDIX 1: SECTION 106 DRAFT HEADS OF TERMS

The applicant notes that Gloucester City Council have an adopted CIL Charging Schedule, any matters not covered by this schedule will be considered as part of a Section 106 agreement.

Gladman will seek to enter into constructive dialogue with Gloucester City Council to agree Section 106 obligations for any obligations which, in accordance with the CIL Regulations (2010) (as amended) are necessary, directly related to the development and fairly related in scale and kind to the development.

The following Heads of Terms are suggested:

AFFORDABLE HOUSING

- i. The Agreement will provide for 20% affordable housing with a tenure split to be agreed with the Local Authority.

OPEN SPACE

- i. The Agreement will require the Developer to provide onsite informal open space and both an equipped children's play area and a neighbourhood equipped area of play.
- ii. Appropriate phasing requirements will be specified together with the requirement to agree with the Council an appropriate scheme for the long term maintenance and management of these areas, including any off-site commuted sums as applicable.

OTHER

- i. Other contributions may be identified through the planning consultation process, and subject to meeting the appropriate tests of necessity and reasonableness, consideration will be given to their inclusion.



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