

Summary of Consultation Comments	Responses
Traffic and highways impact / Road Safety	
<ul style="list-style-type: none"> <li>• The local village roads are small and narrow with several areas having only a single pavement</li> <li>• Dangerous with vehicles, cyclists, people coming in and out at this point. With already multiple recent developments nearby, this is bringing a huge amount of additional traffic to the already congested Secunda Way / Hempsted Lane.</li> <li>• The proposal places additional demands onto the Highway network which has not been mitigated.</li> <li>• Do not have the infrastructure to cope with all the extra vehicles, as there is only one main road (Secunda Way) that gives access to Hempsted Village.</li> </ul> <p>Access / Safety</p> <ul style="list-style-type: none"> <li>• Entrance to site is on narrow segment of Hempsted Lane which will become a bottleneck to turn right onto main road.</li> <li>• The proposed access road is too close to the Traffic Lights at the junction of Hempsted Lane/Secunda Way.</li> <li>• Hempsted Lane is extremely narrow, and the proposed access is located very close to the signalised junction of Hempsted Lane with the A430.</li> <li>• Rea lane and the bridle path is not a safe place for an increase in pedestrian access due to the traffic already present.</li> <li>• Pedestrian Safety should also be considered with respect to the width of the pavement opposite the proposed entrance. It is narrower than the recommended 2m width, especially when footway parking is taken into consideration.</li> </ul> <p>Parking</p> <ul style="list-style-type: none"> <li>• Emergency service vehicles need unhindered access if they are to carry out their roles as lifesavers, crime prevention and medical professionals, increased parking on roads will hinder their access.</li> <li>• The lower end of the village is now being used as a Car Park by many College/University students making it difficult to get in and out of the village and causes much congestion.</li> </ul>	<p><i>During the process of developing a comprehensive application for consideration, the local traffic situation and implications of further development have been analysed as part of a Transport Assessment. This assessment clarifies the impact of a development of this scale and character would be expected to have on both Hempsted and the broader Gloucester area, and whether or not works will need to be conducted to ensure that unsustainable traffic situations are not caused through the course of this development.</i></p> <p><i>The highway authority has no objection following the receipt of additional and updated information subject to conditions and planning obligations.</i></p> <p><i>The Transport Assessment that has been prepared as part of this development proposal investigates the current and potential future implications on road safety by understanding the accident rates for the local network.</i></p> <p><i>This element of the Transport Assessment has concluded that the surrounding area has no major high-accident locations, and that further to this conclusion, there should be no expectation that a development of this size would significantly increase accident rates for the area.</i></p> <p><i>The accessibility of the site is set out in the Transport Assessment and further reinforced in the first and third Technical Notes. As set out in these documents the transport impacts of the proposed development have been extensively analysed and no material or severe impacts have been identified.</i></p> <p><b><i>More detailed information may be found in the Statement on Transport Matters produced by Stirling Maynard Transportation Consultants.</i></b></p>
Local Services	
<p>Community Infrastructure</p> <ul style="list-style-type: none"> <li>• There is already three new developments under construction which will increase pressure on the infrastructure and increase village population.</li> </ul>	<p><i>As part of the application process for this development, NHS England were consulted for their views on surgery capacity concerns for the local area around Hempsted.</i></p> <p><i>We have received feedback from a</i></p>

<ul style="list-style-type: none"> <li>• No real infrastructure to support this ever-growing village.</li> <li>• Pressure on existing village services.</li> <li>• Extra schools, medical facilities, dentist, are much needed now</li> <li>• 245 properties will put a huge strain on the existing sewage system</li> <li>• The water pressure in the village is already low, meaning we are often unable to have a shower or use our washing machine</li> <li>• Hempsted has an active VILLAGE community which is already being strained by continued excessive development over the past 5 years.</li> <li>• The local Spar shop was converted into flats, forcing residents to drive to supermarkets for their weekly shop and adding to traffic congestion/pollution.</li> <li>• Hempsted only has one shop / post office</li> </ul> <p>Schools</p> <ul style="list-style-type: none"> <li>• Little ability for the school to expand.</li> <li>• Pressure on the road around school time is already considerable</li> <li>• The Village C of E School is already oversubscribed, forcing children to be driven to schools outside the area</li> <li>• 245 dwellings including a large number of family homes will lead to a significant increase in the number of primary school age children</li> </ul> <p>GPs/ Doctors/Healthcare</p> <ul style="list-style-type: none"> <li>• Pollution increase may lead to illnesses putting pressure on local surgeries (none of which are in the village of Hempsted) and Gloucester hospital.</li> <li>• no Doctors Surgery or Dentist in the village</li> <li>• It is already difficult for those in the village to register for GPs and dentists, yet again these vital facilities have not been considered with this proposal to increase the population further.</li> </ul>	<p><i>representative for the NHS, who has made us aware that contributions will be sought to ensure appropriate hospital and surgery capacity can be provided. Gladman are grateful for the prompt response from the NHS representative, and are keen to engage with their organisation to determine the contributions necessary for sufficient local provisions.</i></p> <p><i>It is agreed that the proposals will be liable for a Community Infrastructure Levy (CIL) payment at a rate to be determined at the Reserved Matters stage.</i></p> <p><i>Gladman agree that the provision for community infrastructure which is necessary to make the development acceptable in planning terms, and is not funded by CIL, is necessary to be included in a Planning Obligation (pursuant to Section 106 of the Town and Country Planning Act 1990, as amended) where these meet the requirements of Regulations 122 of the 2010 Community Infrastructure Levy Regulations (as updated).</i></p> <p><i>Gloucestershire County Council's Education Department do not object to the Appeal Proposals, subject to the provision of an appropriate financial contribution to provide increased secondary school (11-16) provision in order to accommodate the appeal proposals, Gladman is happy to oblige with this.</i></p>
<p>Landscape</p>	
<p>Landscape / Visual impact</p> <ul style="list-style-type: none"> <li>• The view of the site from the A430 has been appreciated and commented on by visitors and would be totally lost by the proposed development. We understand that this is governed and protected by a Policy of the JCS(SD6).</li> <li>• Bridle Path views are spectacular, much appreciated by walkers and are not totally obliterated by summer growth as intimated by Gladman in their report, The development would deny users of the path these spectacular views.</li> </ul>	<p><i>While this scheme is proposing development over a green field, all landscape features and natural characteristics of the site will be retained, and where possible enhanced, during the course of delivering residential dwellings on this location.</i></p> <p><i>The need to develop some greenfield sites within the open countryside and adjacent to existing settlements is an inevitable consequence of the necessary expansion of urban areas to cater for a naturally increasing population; An issue that is further compounded by existing shortfall, both</i></p>

<ul style="list-style-type: none"> <li>• The fields have an elevated position and are therefore highly visible as noted in various detailed landscape assessment studies.</li> <li>• This is a prominent, sensitive site and development will inevitably have a significant landscape and visual impact both in short and longer views destroying the rural landscape character of the villages surroundings.</li> </ul> <p>Use of greenfield sites</p> <ul style="list-style-type: none"> <li>• Reduction in green space amenity for residents.</li> <li>• Impact on greenbelt land which is not allocated for development within the City Plan</li> <li>• This site is the only remaining farm growing harvested crops of the original 12 in the village.</li> <li>• Gloucester has a huge number of brownfield sites which would be far more suitable for such large developments.</li> </ul> <p>Layout</p> <ul style="list-style-type: none"> <li>• The outline planning application would overlook and overshadow existing properties.</li> <li>• Loss of privacy.</li> <li>• Overshadowing - Loss of light.</li> </ul> <p>Conservation</p> <ul style="list-style-type: none"> <li>• It is on a site of possible historic/roman importance.</li> <li>• Strategic oil pipeline in the area.</li> </ul>	<p><i>local to the Gloucester City area as well as growing on a national scale.</i></p> <p><i>It is agreed that this should be done in a manner that does not detrimentally affect the local environment to existing settlements. This potential harm has, because of this fact, been assessed as part of the LVIA document included as part of this development proposal. <b>More information can be found in the LVIA which concludes that development of this site can be achieved without adverse environmental impact.</b></i></p> <p><i>Gladman demonstrate that sufficient open space could be provided on the site to comply with policies OS.2 and OS.3 (7.51ha of public open space, including a Locally Equipped Area of Play [LEAP] and a Neighbourhood Equipped Area of Play [NEAP]), and will be secured via S106 along with ongoing management and maintenance. This would also include the on-site areas of informal open space, wildflower planting, and potential green buffers to enhanced hedgerows as natural protection areas to wildlife migration corridors. The areas of public open space would exceed the requirements of the adopted Local Plan policies.</i></p> <p><i>Gladman considers that the appeal scheme would not be incompatible with existing residential uses in close proximity to the site and the protection of residential amenity can be controlled through the reserved matters application stage.</i></p> <p><i>Gladman considers that the appeal scheme would cause no harm in respect of impact on the significance of heritage assets and in particular, to the setting of Hempsted Conservation Area.</i></p>
<b>Environment</b>	
<p>Impact on Trees/ Hedgerows</p> <ul style="list-style-type: none"> <li>• The hedgerows between these fields supports a variety of wildlife and these would be lost to the locale forever, and the hedgerow on Hempsted Lane severely impacted by loss and cutting back to enable clearer visibility for entry and exit to the proposed development site.</li> </ul> <p>Impact on Wildlife and/ or Protected Species</p> <ul style="list-style-type: none"> <li>• Area is well used by wildlife</li> <li>• Negative imbalance in nature in this area</li> </ul>	<p><i>From a purely arboricultural point of view, development would provide an opportunity to increase tree cover in the area provided a suitable landscaping scheme comes forward and can be agreed.</i></p> <p><i>Gladman believe that there is no adverse impact in respect of air quality, noise, and vibration to weigh in the planning balance, subject to the imposition of appropriately worded planning conditions.</i></p>

<ul style="list-style-type: none"> <li>Leaving a pond in the plan would not leave a suitable environment for the existing wildlife to continue as at present.</li> <li>The area is full of unique habitats which have taken many years to establish and the effect of building on this site would clearly damage and destroy these habitats. - This is contrary to Policy SD6 of the JCS as the development will not protect the essential value wildlife brings to environmental and social wellbeing.</li> <li>Species and Protected Species spotted on site includes: Great Crested Newts, Bats, Owls (Barn Owls) Deer, Badgers, Roman Snails</li> </ul> <p>Pollution</p> <ul style="list-style-type: none"> <li>constant noise pollution of the environment.</li> <li>Severe pollution will be added due to the extra vehicles</li> <li>The local primary school is already oversubscribed so children will need to be transported to other schools, adding to the carbon footprint.</li> </ul> <p>Cordon Sanitaire</p> <ul style="list-style-type: none"> <li>Odours emitted from Netheridge Sewage Treatment Works</li> <li>Within the cordon sanitaire of the sewage treatment works.</li> <li>The village is already affected by the smells from the site, and we fear that the sewerage system could not sustain a further sprawling mass of housing-building.</li> <li>Houses should not be built even closer to this foul-smelling area.</li> </ul> <p>Flooding</p> <ul style="list-style-type: none"> <li>The bottom of the site is on a flood plain. I regularly see flooding there.</li> <li>If the development goes ahead, there will be a problem with surface water runoff, causing existing properties in the area in Rea Lane to be flooded.</li> </ul>	<p><i>Gladmans' revised Development Framework Plan received on 16th August 2022 illustrates a wider 'buffer zone' so as to keep the dwellings away from the projected higher odour contours flowing from the treatment works.</i></p> <p><i>The flood risk assessment that has been done for this location takes into account the existing designated flood zones within the nearby area. Built development is not proposed in the Environment Agency's high risk flood zones. Appropriate drainage solutions are proposed for the proposed development.</i></p> <p><i>With the solutions proposed, the assessment can conclude that not only will flood risk not be increased for the area, but it is also possible for this solution to deliver a betterment as a climate change allowance is provided for in the drainage scheme, meaning that the site will drain at a lower rate than it does now.</i></p> <p><b><i>More detailed information on drainage and flooding may be found in the Technical note produced by Enzygo Ltd.</i></b></p> <p><b><i>More detailed information may be found in the Ecology Response provided by Wardell Armstrong.</i></b></p>
<b><i>Planning Policy</i></b>	
<p>Site status in local plan</p> <ul style="list-style-type: none"> <li>The Draft City Plan Policy A requires that developments should be of a considerate scale and form to be commensurate with the locality. The housing density appears to be considerably greater in the proposed plan to the density of the adjacent developments, and the sheer scale of the venture is out of proportion to the rest of the area, and therefore would not be in keeping and would not respect the identity of the existing village.</li> </ul>	<p><i>All new dwellings will be designed to the requirements set out within Gloucester City Council's and Gloucestershire County Council's Supplementary Planning Documents.</i></p> <p><i>The proposal seeks to provide a range of housing types, tenures and sizes to cater for different requirements. Precise details of house types will be provided at reserved matters application stage.</i></p>

<ul style="list-style-type: none"> <li>• land has not been included for housing in the agreed Joint Core Strategy or the City Plan.</li> <li>• It is contrary to Policy SD6 of the JCS (Joint Core Strategy) which requires developments to protect landscape character for its own intrinsic beauty and for its benefit to economic, environmental and social well being.</li> <li>• It is in contravention of Gloucester Council's Strategic Plan 2017-2020.</li> </ul> <p>Need for housing / 5 year supply</p> <ul style="list-style-type: none"> <li>• Council has already assessed the suitability of the site for residential development through its Strategic Housing Land Availability Assessment and concluded it was unsuitable for a number of reasons.</li> <li>• Whilst there is a clearly identified need for new housing in Gloucester and nationally, this does not mean that unsuitable sites should be released for development. The City Council is able to demonstrate an adequate 5-year supply of deliverable housing land and as such the relevant development plan policies carry full weight.</li> <li>• I understand developments are always needed as housing stock is always in short supply.</li> </ul> <p>Affordable Housing</p> <ul style="list-style-type: none"> <li>• This won't be affordable housing, nor will it contain bungalows or more sympathetic homes for the elderly or disabled.</li> </ul> <p>Size of development / Number of dwellings</p> <ul style="list-style-type: none"> <li>• The indicative layout suggests a relatively dense development of 38 dwellings per hectare. This is considered to be contrary to Policy SD4 of the JCS.</li> <li>• There is no allowance/provision for bungalows for the elderly as this is a big part of the original structure of the village</li> <li>• We would strongly disagree with any three-story houses as it would not only shade our garden but allow people to see into our house. If this development does go ahead, we would like consideration to a 3-meter planted buffer area (planted before development starts to allow maturity).</li> </ul>	<p><i>It is acknowledged that the proposal constitutes a departure from the development plan policies SP1, SP2 and SP10 because the site lies outside the defined boundary of Gloucester. However, as a consequence of a lack of five-year housing land supply, the most important policies for determining the application are out of date, and as guided by the NPPF, planning permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of doing so.</i></p> <p><i>The development proposal will provide a policy compliant level of 20% affordable housing which equates to up to 37 dwellings based on the most recent revision of the Development Framework Plan.</i></p>
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## APPENDIX 2

### 1 NATIONAL PLANNING POLICY FRAMEWORK

- 1.1.1 The latest version of the National Planning Policy Framework was published on the 20<sup>th</sup> July 2021 and, from the date of publication, its policies are a material consideration to be taken into account when dealing with applications<sup>1</sup>.
- 1.1.2 The Framework sets out the Government's planning policies for England and how these are expected to be applied; it also sets out the requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so.
- 1.1.3 Planning law requires that applications must be determined in accordance with the development plan unless material considerations indicate otherwise. This is confirmed by paragraphs 2, 12 and 47 of the Framework, which continue to place importance on the plan-led approach. The Framework is, however, a material consideration in decision taking from the date of its publication<sup>2</sup>.
- 1.1.4 The Government has made clear its expectation, through the Framework, that the planning system will positively embrace well-conceived development to deliver the economic growth necessary and the housing needed to create inclusive and mixed communities so that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.
- 1.1.5 The Framework, at paragraph 48, confirms that emerging development plans may also be afforded weight in the decision-making process according to their stage of preparation and the extent of unresolved objections to them.
- 1.1.6 My evidence explains how the presumption in favour of sustainable development set out at paragraph 11 of the Framework is engaged in the case due to absence of a five-year housing land supply.
- 1.1.7 As stated at paragraph 11(d)(ii), with the presumption engaged the decision should be to grant planning permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. Paragraph 11(d)(i) asserts that the presumption can be disengaged where policies in the Framework provide a clear reason for refusing development – this does not apply in the current case.

#### **Achieving sustainable development**

- 1.1.8 Paragraph 7 of the Framework summarises the objective of sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own

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<sup>1</sup> Paragraph 218.

<sup>2</sup> Paragraph 218.

needs. Paragraph 7 also makes reference to the UK's commitment to meeting the 17 Global Goals for Sustainable Development which address social progress, economic wellbeing and environmental protection.

1.1.9 Paragraph 8 notes that to achieve sustainable development, there are three overarching objectives that need to be pursued in mutually supportive ways: social, economic and environmental. Under the 2021 Framework greater reference is made to 'beautiful and safe' places as a social objective.

1.1.10 The appeal proposals will deliver homes that are required now to meet both market and affordable housing need at this sustainable location and allow for a choice of modes of transport to be used to access local facilities and services. Further, the site is situated in a location that is accessible to a range of industrial and commercial employment opportunities in both the centre and periphery of Gloucester. The appeal proposals will be required by the Framework to be "beautiful and safe" at the reserved matters stage.

### **Delivering a sufficient supply of homes**

1.1.11 Paragraphs 60-80 set out how the Government's objective of "significantly boosting" the supply of homes is to be achieved. The appeal proposals will assist the Council by helping to boost the supply of both market and affordable housing in an area where the Council acknowledges it has a pressing shortage.

1.1.12 Paragraphs 60/61 of the Framework state that local authorities should seek to deliver a wide choice of quality homes and widen opportunities for home ownership, planning for a mix of housing based on current and future demographic trends. The proposal would provide for a range of market and affordable homes of various sizes and tenures meeting the expectations of the Framework.

1.1.13 Paragraph 61 of the Framework states that strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance, unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

1.1.14 The definition of local housing need is set out at Annex 2 of the Framework, as follows:

**"The number of homes identified as being needed through the application of the standard method set out in national planning guidance, (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach...)"**

1.1.15 Paragraph 63 of the Framework states that planning policies should also specify the type of affordable housing required and expect it to be met on site. In this instance, the Appellant has been guided by the Council as to the appropriate affordable tenure mix to be secured via the planning obligation and the appellant anticipates that the appropriate affordable housing requirement will be met in full on site. The proposal will provide for a range of market and affordable homes of



various sizes and tenures. These new dwellings will also help to free up existing dwellings that are under-occupied, enabling more efficient use of existing housing stock to be made.

- 1.1.16 Paragraph 74 of the NPPF notes that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a **minimum** five years' worth of housing against their housing requirement or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of either 5%, 10% or 20%. A 20% buffer should be applied where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.
- 1.1.17 It is common ground that Gloucester City Council are unable to demonstrate a five-year housing land supply. For the purposes of this appeal, the current claimed supply is 4.41 years.
- 1.1.18 The consequence of that inability to demonstrate a 5YHLS is that the tilted balance must be applied: see footnote 8 of the NPPF, and §008 of the PPG on "Housing and economic land availability assessment":

***"What happens if an authority cannot demonstrate a 5 year land supply?"***

*'In decision-taking, if an authority cannot demonstrate a 5 year housing land supply, including any appropriate buffer, the presumption in favour of sustainable development will apply, as set out in paragraph 11d of the National Planning Policy Framework.'*

**Building a strong, competitive economy**

- 1.1.19 Paragraph 80 of the Framework maintains that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 1.1.20 The economic benefits associated with the appeal proposals are set out at appendix 5 of my evidence and in more detail within the Socio-economic Sustainability Statement (CD6.4) submitted with the planning application. In my opinion, these are real benefits that are derived from the scheme and should be given moderate weight in the planning balance.

**Promoting healthy and safe communities**

- 1.1.21 Paragraph 92 of the Framework promotes the aim of achieving healthy, inclusive and safe places by promoting social interaction, creation of places which are safe and accessible and also supporting healthy lifestyles through the provision of green infrastructure places. The Illustrative Masterplan that is included within the DAS and the revised Development Framework Plan demonstrates how the provision of open space, landscaping, and informal open space and potential footpath linkages could be integrated into a detailed design for the site at reserved matters stage.
- 1.1.22 The Development Framework Plan (CD6.17) shows a total of 7.51 ha of formal and informal open space (over 61% of the gross site outline application area); including accessible open space, three

children's / youth play areas, informal parkland, community orchard and recreational footpaths. The green infrastructure framework will allow for appropriate landscape and ecological mitigation measures to be applied, the provision of new public open space and the incorporation of new hedgerow and tree planting to create a firm, green edge to the settlement.

- 1.1.23 These components of the scheme will enable the new resident community, together with the existing, to use these networks in order to take exercise and thus the proposed scheme will actively promote general well-being for the new and existing resident community.

### **Promoting sustainable transport**

- 1.1.24 Paragraphs 104-113 of the Framework set out how transport factors should be taken into account when considering development. In accordance with paragraph 113 of the Framework, the application was supported by a detailed Transport Assessment (CD1.9) and Travel Plan (CD1.10). The submitted documents demonstrate that the development proposals are acceptable in highways and transportation terms, in accordance with paragraph 111 of the Framework.

- 1.1.25 Paragraph 111 of NPPF states:

**“Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road networks would be severe.”**

- 1.1.26 The Local Highway Authority does not object to the proposals subject to the imposition of conditions and also contributions to be secured by planning obligations towards the costs of improvements to uncontrolled crossing points at Hempsted Lane/Court Gardens and Hempsted Lane/Hinton Close. They do not consider that there will be a severe impact upon the highway network, nor do they consider there will be an unacceptable impact on highway safety.

- 1.1.27 The locational sustainability of the site is discussed in Mr Weeks' proof of evidence. Mr Weeks is clear that the appeal site is in a sustainable location and that future residents will have a real choice of transport modes available to them to allow them to access services and facilities both in Gloucester and further afield.

### **Making effective use of land**

- 1.1.28 Paragraph 119 of the Framework states that:

**“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions...”**

- 1.1.29 The application proposals provide a suitable location for housing development and would be an effective use of the land. The proposals also accord with paragraph 120 as they would offer opportunities to achieve net environmental gains by both enabling new habitat creation and improving public access to open space, not previously available.

- 1.1.30 The overall average net density for the residential development area is 35-40 dwellings per hectare (dph), which respects the character and form of the surrounding area. The density within the main part of the Site equates to 40 dph, with lower density housing proposed in the southwestern area of the development at a density of 35 dph.

### **Achieving Well Designed Places**

- 1.1.31 The Framework states that good design is a “key aspect of sustainable development”; the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. The latest iteration of the Framework places greater emphasis on design being “beautiful”, with paragraph 129 focusing on the need to produce design codes at an area-wide, neighbourhood or site-specific scale. Paragraph 131 states that planning decisions should ensure that new streets are tree-lined, for amenity and climate change resilience reasons.
- 1.1.32 The scheme is in outline, with all matters reserved except for details of the main site access. The DAS (CD1.4) demonstrates how the site will deliver a high quality sustainable residential development. It provides a comprehensive appraisal of how the design of the proposals have evolved through an iterative process that was informed by environmental and technical work and an understanding of the development’s relationship with Gloucester and the surrounding context.
- 1.1.33 The most recent Development Framework Plan (CD6.17) prepared for the application demonstrates that the new streets proposed will be tree lined. This can be secured by a suitably worded planning condition.

### **Meeting the challenge of climate change, flooding and coastal change**

- 1.1.34 This section of the Framework states that the planning system should support the transition to a low carbon future in a changing climate, helping to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience (particularly in respect of flood risk) and support renewable and low carbon energy.
- 1.1.35 Paragraphs 153 to 158 set out the Government’s approach to tackling climate change through the planning system. It is stated that new development should avoid vulnerability from impacts arising from climate change, ensuring adaptation measures are brought forward such as encouraging green infrastructure, and helping to reduce emissions through the location, orientation and design of development.
- 1.1.36 The above matters have been taken into account in designing the proposal, which includes a considerable net gain in biodiversity and green infrastructure provision. Matters such as design and massing will be required to conform to the Framework and any local policies in place at the Reserved Matters stage. Development will also be required to meet the requirements of the Building Regulations in place at the time in respect of energy generation.
- 1.1.37 Paragraph 159 of the NPPF states that development should be directed away from areas at highest risk of flooding.

- 1.1.38 Paragraph 167 of the NPPF deals with potential flooding issues by requiring applications to be supported by a site-specific flood-risk assessment where appropriate. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:
- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
  - b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;
  - c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate
  - d) any residual risk can be safely managed; and
  - e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.
- 1.1.39 A Flood Risk Assessment (FRA) (CD1.16) was submitted with the planning application and a further technical note to the appeal (CD8.1). The FRA considers the existing flood risk of the site and includes an assessment of the surface water drainage requirements of the site. The FRA is clear that the appeal proposals would be at minimal risk from flooding, would not increase flood risk elsewhere and are compliant with the requirements of the Framework. The appeal proposals also allow for the control of surface water run-off from the appeal site.

## **Conserving and Enhancing the Natural Environment**

### ***Ecology***

- 1.1.40 Paragraph 174(d) of the Framework states that planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- 1.1.41 It is common ground that subject to securing the recommended mitigation through conditions, the proposals will not have an unacceptable impact on protected species and or habitats within the site.
- 1.1.42 The Biodiversity Net Gain Assessment Update (CD6.13.1) concludes that the Appeal Scheme would result in a meaningful net gain in biodiversity for both 'Habitat Units' and 'Hedgerow Units' capable of exceeding 10% net gain.

### ***Landscape***

- 1.1.43 Paragraph 174 of the Framework states that the planning system should contribute to and enhance the natural and local environment by *inter alia* protecting and enhancing valued landscapes (in a

manner commensurate with their statutory status or identified quality in the development plan) and recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

1.1.44 The Planning SoCG confirms that:

- The Appeal Site is not covered by any landscape designation and does not form part of a ‘valued landscape’ for the purposes of Framework paragraph 174.
- Any landscape harm arising from the development would not give rise to significant adverse impact, albeit landscape impact is a matter to be considered in the planning balance. The parties agree that any degree of landscape harm would be outweighed by the benefits of the proposals in the planning balance.

1.1.45 Releasing greenfield sites for development is an inevitable consequence of meeting the city’s housing needs.

### ***Environmental Health***

1.1.46 Paragraph 185 of the Framework states:

**“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development...”**

1.1.47 Paragraph 185a of the NPPF states that planning policies and decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.

1.1.48 Paragraph 187 of the Framework further states:

**“Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities..... Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed”**

- 1.1.49 Having regard to the accompanying evidence of Mr Walton and these elements of the Framework, it is my view that there are no adverse impacts in respect of air quality, noise, and vibration to weigh in the planning balance, subject to the imposition of appropriately worded planning conditions.

### **Conserving and Enhancing the Historic Environment**

- 1.1.50 Section 16 of the Framework provides policy guidance on the conservation and investigation of heritage assets.

- 1.1.51 In the Framework, heritage significance is defined as:

**“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”**

- 1.1.52 Paragraph 202 of the Framework states:

**“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”**

- 1.1.53 It is common ground between the parties that a programme of further archaeological investigation would need to be carried out prior to submission of reserved matters, and this can be secured by planning condition.

### **Facilitating the sustainable use of minerals**

- 1.1.54 Paragraph 211 of the Framework states that when determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy.

- 1.1.55 The parties agree that the site is not appropriate for mineral extraction/prior extraction, such that there will be no harm relating to minerals.

### **Planning Conditions and Obligations**

- 1.1.56 Paragraphs 55-58 of the Framework restate previous advice on conditions and obligations and Community Infrastructure Levy charges, emphasising their impact on viability. Paragraph 55 requires conditions precedent to be avoided, unless there is clear justification. Footnote 25 of the Framework refers to a legislative requirement for applicants to provide their written agreement to the imposition of any pre-commencement conditions.

- 1.1.57 The appellant will seek to agree a schedule of draft list of conditions with the Council prior to the opening of the inquiry.

- 1.1.58 A final unilateral undertaking will be provided in advance of the inquiry, which will make provision for all infrastructure and contributions requested by statutory consultees through the planning application process.

### **Conclusion**

- 1.1.59 The appeal proposals have been assessed against the various relevant chapters of the Framework, which confirms that they comprise sustainable development as a result of:
- i. Providing a deliverable housing development that will make a valuable contribution towards national and local objectives for economic growth;
  - ii. Being accessible by public transport and other sustainable means, promoted through a Travel Plan as well as enhancements to promote travel by sustainable modes;
  - iii. Making an important contribution towards meeting the five-year housing land requirement in the district;
  - iv. Contributing to housing choice and the mix of housing in the area; in particular making an important contribution to affordable housing needs;
  - v. Being capable of delivering a beautiful high quality design;
  - vi. Promoting healthy communities through integration with the existing settlement and the provision of open space;
  - vii. Being located on land at low risk of flooding and ensuring that the development will not increase flood risk downstream; and
  - viii. Conserving and enhancing the natural environment.
- 1.1.60 Accordingly, I consider the above demonstrates the proposals amount to sustainable development.





# Gladman Site Delivery: 01.04.2016 - 31.03.2021.

Issued December 2021

	Local Planning Authority	Site Address	App Reference	Outline Permission Granted Date	Number of Dwellings	% Affordable	Purchaser	Reserved Matters Planning Application Reference	Reserved Matters Permission Granted Date	Conditioned Timescale of Reserved Matters	Commencement on Site	Timescale from Initial Planning Permission to Commencement
1	Amber Valley Borough Council	Roes Lane, Crich, Phase 2	AVA/2016/0464	12/04/2017	60	30%	Harron Homes	AVA-2018-0750	22/03/2019	3 years	October 2019	29 months
2	Aylesbury Vale District Council	Lower Road II, Stoke Mandeville	16/00448/AOP	08/03/2017	190	30%	Bloor Homes	17/01221/ADP	14/09/2017	2 years	January 2018	10 months
3	Aylesbury Vale District Council	Lower Road I, Stoke Mandeville	15/04341/AOP	09/03/2017	117	30%	Abbey Developments	18/01857/ADP	19/06/2019	2 years	July 2019	28 months
4	Aylesbury Vale District Council	North End Road, Steeple Claydon	15/01490/AOP	17/06/2016	60	30%	Bovis Homes	17/00543/ADP	12/09/2017	18 months	May 2018	23 months
5	Ashford Borough Council	The Street, Smarden	16/00045/AS	12/06/2017	50	35%	Countryside Properties	18/00576/AS	25/02/2019	3 years	August 2019	26 months
6	Braintree District Council	Oak Road, Halstead	14/01580/OUT	03/06/2016	292	30%	BDW Homes	17/01952/REM	25/01/2018	3 years	April 2018	22 months
7	Braintree District Council	Western Road, Silver End	15/00280/OUT	21/03/2017	350	40%	Redrow Homes	18/01693/FUL	03/12/2018	2 years	December 2018	21 months
8	Braintree District Council	Sudbury Road, Halstead	17/00575/OUT	09/11/2017	205	40%	Bellway Homes	18/01749/FUL	11/06/2019	2 years	December 2019	25 months
9	Braintree District Council	Station Road, Earls Colne	18/00121/OUT	08/01/2019	115	40%	Bellway Homes	19/00802/REM	27/09/2019	3 years	September 2020	20 months
10	Braintree District Council	Stone Path Drive, Hatfield Peverel	16/01813/OUT	08/07/2019	140	40%	Bellway Homes	20/01906/REM	14/05/2021	2 years	May 2021	22 months
11	Breckland District Council	Dereham Road, Mattishall	2015/0498/O	06/03/2018	50	40%	Hopkins & Moore Developments	3PL/2020/0462/F	30/07/2021	2 years	October 2021	43 months
12	Central Bedfordshire Council	Mill Road, Cranfield	CB/14/05007/OUT	13/06/2016	113	35%	Bloor Homes	CB/16/04924/RM	21/03/2017	3 years	April 2017	10 months
13	Central Bedfordshire Council	Chapel End Road, Houghton Conquest	CB/15/01362/OUT	02/06/2016	125	35%	Kier Homes	CB/17/01389/REM	26/06/2017	3 years	August 2017	14 months
14	Central Bedfordshire Council	Biggleswade Road, Potton	CB/16/03943/OUT	03/01/2018	85	35%	Mulberry Homes	CB/19/00085/RM	02/05/2019	3 years	June 2019	18 months
15	Central Bedfordshire Council	High Street, Silsoe	16/01855/OUT	12/04/2018	105	35%	Kingstley Homes	CB/18/04409/RM	26/02/2019	2 years	April 2019	12 months
16	Central Bedfordshire Council	Shefford Road, Meppershall	CB/17/03887/OUT	22/05/2018	150	35%	Davidsons	CB/19/03877/RM	18/12/2020	3 years	June 2021	37 months
17	Central Bedfordshire Council	Hitchin Lane, Clifton	CB/15/02733/OUT	17/02/2017	97	35%	Mears Group	CB/18/02637/RM	27/12/2018	2 years	September 2019	31 months
18	Central Bedfordshire Council	Taylors Road, Stotfold	16/03344/OUT	18/09/2018	78	35%	BDW Homes	CB/19/01302/RM	19/09/2019	3 years	February 2020	17 months
19	Chelmsford City Council	Main Road, Great Leighs	14/01791/OUT	26/09/2016	100	35%	Bellway Homes	17/01949/REM	15/03/2018	3 years	March 2018	18 months
20	Chelmsford City Council	Plantation Road, Boreham	14/01552/OUT	25/05/2016	145	35%	Bloor Homes	18/00682/REM	10/08/2018	3 years	September 2018	27 months
21	Cherwell District Council	Sibford Road, Hook Norton	14/00844/OUT	04/08/2016	54	35%	Lioncourt	17/00950/REM	21/12/2017	18 months	May 2018	21 months
22	Cherwell District Council	White Post Road, Banbury	15/01326/OUT	20/12/2017	280	30%	BDW Homes	19/00895/REM	31/07/2020	3 years	October 2020	33 months
23	Cheshire East Council	Abbey Road, Sandbach	14/1189C	30/10/2016	165	30%	Lane End Developments	18/2346C	17/01/2019	3 years	March 2019	30 months
24	Cheshire East Council	Church Lane, Wistaston	14/3024N	21/09/2016	300	30%	Bloor Homes	17/6042N	11/07/2018	3 years	July 2018	22 months
25	Cheshire East Council	East Avenue, Weston	15/1552N	18/08/2016	99	35%	Lovell	18/1073N	13/12/2018	3 years	March 2019	31 months
26	Cheshire East Council	London Road, Holmes Chapel	14/5921C	31/10/2016	190	30%	Bloor Homes	17/6123C	14/05/2018	3 years	October 2018	24 months
27	Cheshire East Council	Dickens Lane, Poynton	17/4256M	27/11/2018	150	30%	Bellway Homes	19/1972M	15/05/2020	3 years	October 2020	23 months
28	Colchester Borough Council	Barbrook Lane, Tiptree	182014	07/04/2020	200	30%	Bloor Homes	210398	01/06/2021	3 years	July 2021	15 months
29	Cotswold District Council	Berkeley Close, South Cerney	16/02598/OUT	15/08/2017	90	50%	Wain Homes	18/04656/REM	05/07/2019	3 years	August 2019	24 months
30	Derbyshire Dales District Council	Main Road, Brailsford	16/00567/OUT	11/07/2017	75	35%	Avant Homes	18/00397/REM	12/09/2018	3 years	May 2019	22 months
31	East Cambridgeshire Council	Mildenhall Road, Fordham	17/00481/OUT	30/05/2018	100	30%	Bellway Homes	19/01054/RMM	07/02/2020	3 years	May 2020	24 months
32	East Cambridgeshire Council	Manor Road, Witchford	18/00820/OUT	07/11/2018	116	30%	Bellway Homes	19/01502/RMM	18/06/2020	3 years	August 2020	21 months
33	Folkestone & Hythe District Council	Ashford Road, New Romney	Y18/1404/FH	30/08/2019	117	30%	Pentland Homes	21/0007/FH	27/08/2021	2 years	September 2021	25 months
34	Forest of Dean District Council	Ross Road, Newent	P0969/14/OUT	10/04/2017	85	40%	Bellway Homes	P0328/18/APP	08/08/2018	2 years	October 2018	17 months
35	Forest of Dean District Council	Berry Hill, Coleford	P1482/14/OUT	11/04/2018	180	40%	BDW Homes	P1547/19/APP	14/02/2020	2 years	June 2020	26 months
36	Harborough District Council	Leicester Road, Great Bowden	16/01942/OUT	18/10/2017	50	40%	Mulberry	18/00692/REM	11/10/2018	3 years	January 2019	15 months
37	Harrogate Borough Council	Ripon Road, Killinghall	16/00582/OUTMAJ	07/12/2016	75	40%	Harron Homes	17/04957/REMMAJ	17/10/2018	2 years	January 2019	25 months
38	Harrogate Borough Council	Knarsborough II, Boroughbridge Road	17/01350/OUTMAJ	14/06/2019	120	40%	Galliford Try	19/04911/REMMAJ	05/08/2020	3 years	June 2021	24 months
39	Herefordshire Council	B4349, Clehonger	P141964/O	17/11/2016	90	35%	Stonewater Developments	P193878/RM	04/02/2021	3 years	October 2020	47 months
40	Herefordshire Council	Leadon Way, Ledbury	143116	04/04/2016	321	35%	BDW Homes	P160408/RM	21/12/2017	3 years	January 2018	20 months
41	Huntingdonshire District Council	Lucks Lane, Buckden	16/00576/OUT	18/07/2017	180	40%	Bloor Homes	18/02485/REM	16/07/2019	3 years	December 2019	30 months
42	Huntingdonshire District Council	Station Road 2, Warboys	16/02519/OUT	31/10/2017	80	40%	David Wilson Homes	18/00776/REM	30/11/2018	3 years	December 2018	14 months
43	Maidstone Borough Council	Mill Bank, Headcorn	15/507424/OUT	24/08/2016	62	40%	Bovis Homes	17/501093/REM	15/09/2017	2 years	March 2018	18 months
44	Maldon District Council	Soutminster Road, Burnham-on-Crouch	14/00845/OUT	21/04/2017	80	30%	Matthew Homes	18/01077/RES	01/03/2019	2 years	February 2021	46 months
45	Medway Council	Stoke Road, Hoo St Werburgh	MC/16/2837	13/02/2017	127	25%	Taylor Wimpey	MC/18/0702	13/07/2018	3 years	February 2019	24 months
46	Mid Suffolk District Council	Church Road, Stowupland	3112/15	25/05/2016	175	35%	Bloor Homes	DC/17/02755	07/11/2017	3 years	February 2018	21 months
47	Milton Keynes Council	Olney Road, Lavendon	17/00165/OUT	04/05/2018	95	35%	BDW Homes	19/00212/REM	02/12/2019	3 years	January 2020	19 months
48	Northumberland County Council	Milkwell Lane, Corbridge	15/00381/OUTES	21/09/2016	233	15%	Miller Homes	17/04547/REM	14/08/2018	3 years	December 2019	39 months
49	North Hertfordshire District Council	Holywell Road, Pirton	15/01618/1	27/05/2016	82	40%	Cala Homes	16/02256/1	30/05/2017	3 years	June 2017	13 months
50	Nuneaton & Bedworth Borough Council	The Longshoot, Nuneaton	033157	11/04/2016	330	25%	BDW Homes	034334	11/01/2017	3 years	September 2017	17 months
51	Oadby & Wigston Council	Welford Road, Wigston	17/00539/OUT	10/10/2018	43	40%	Redrow Homes	19/00160/REM	18/08/2019	3 years	September 2019	11 months
52	Peterborough City Council	Uffington Road, Barnack	15/01840/OUT	27/03/2017	80	30%	Linden Homes	18/00377/REM	06/07/2018	3 years	October 2018	19 months
53	Preston City Council	Preston Road, Grimsargh	06/2014/0902	09/05/2016	150	30%	Story Homes	06/2018/1243	09/04/2019	3 years	September 2019	40 months
54	Ribble Valley Borough Council	Henthorn Road, Clitheroe, Phase 2	3/2018/0688	19/06/2019	110	30%	Miller Homes	3/2020/0266	26/06/2020	18 months	September 2020	15 months
55	Rushcliffe Borough Council	Lantern Lane, East Leake	17/02292/OUT	18/07/2018	195	20%	Miller Homes	20/02632/REM	12/03/2021	3 years	April 2021	32 months
56	Ryedale District Council	Langton Road, Norton	15/00098/MOUT	22/07/2016	85	35%	Keepmoat	17/01517/MREM	08/06/2018	3 years	October 2018	25 months
57	South Cambridgeshire District Council	Highfields Road, Highfields Caldecote	S/2510/15/OL	05/07/2017	140	40%	Linden Homes	S/4619/18/RM	14/11/2019	2 years	February 2020	31 months
58	South Cambridgeshire District Council	Rampton Road, Cottenham	S/2413/17/OL	09/08/2017	200	40%	Redrow Homes	S/2679/19/RM	18/02/2020	2 years	June 2020	34 months
59	South Gloucestershire Council	Poplar Lane, Wickwar	PK16/4006/O	24/05/2017	80	35%	Bellway Homes	PK17/5966/RM	29/06/2018	3 years	October 2018	17 months
60	South Kesteven District Council	Sheepwash Lane, Grantham	S14/3571	27/07/2016	300	35%	Countryside	S19/1056	21/11/2019	3 years	January 2020	42 months
61	South Somerset District Council	Forton Road, Chard	15/04772/OUT	02/08/2017	200	35%	Kier Homes	18/01902/REM	21/02/2019	3 years	August 2019	24 months
62	Stratford-on-Avon District Council	Warwick Road, Kineton	15/03101/OUT	17/11/2016	78	35%	Morris Homes	17/03010/REM	09/10/2018	3 years	May 2021	54 months
63	Stratford-on-Avon District Council	Knightcote Road, Bishops Itchington	14/03419/OUT	20/06/2016	84	35%	Bovis Homes	17/01884/REM	22/03/2018	3 years	August 2018	26 months
64	Stroud District Council	Box Road, Cam	S 17/1366/OUT	19/12/2018	90	30%	Wainhomes	S 19/0810/REM	19/02/2020	3 years	March 2020	15 months
65	Telford and Wrekin Council	Haygate Road, Wellington	TWC/2013/1003	15/04/2016	290	25%	Bovis Homes & Anwyl	TWC/2017/0643	22/03/2018	3 years	June 2018	26 months
66	Tendering District Council	Parsons Heath, Bromley Road	17/00859/OUT	13/09/2018	145	30%	Bellway Homes	19/01392/DETAIL	05/05/2020	2 years	August 2020	23 months
67	Tewkesbury Borough Council	Twigworth, Tewkesbury Road	17/00852/OUT	19/12/2018	74	35%	Wainhomes	19/00953/APP	20/10/2020	3 years	February 2021	26 months
68	Tewkesbury Borough Council	Stoke Road, Bishops Cleeve	18/00249/OUT	11/11/2019	215	40%	Spitfire Bespoke Homes	21/00214/APP	10/09/2021	2 years	October 2021	23 months
69	Tonbridge & Mailing Borough Council	Kings Hill, Teston Road	18/01013/OA	10/09/2019	120	40%	Crest Nicholson	20/00171/RM	15/07/2020	3 years	February 2021	17 months
70	Vale of White Horse District Council	Townsend Road, Shrivenham	P15/V0663/O	06/05/2016	116	40%	Bovis Homes	P17/V0800/RM	18/04/2018	3 years	December 2018	30 months
71	Vale of White Horse District Council	Main Street, East Hanney	P15/V0343/O	03/05/2016	55	40%	Bovis Homes	P17/V2973/RM	23/08/2018	18 months	May 2019	36 months
72	Wealden District Council	Mill Road, Hailsham	WD/2016/0658/MAO	26/05/2016	165	35%	Linden Homes	WD/2017/1708/MRM	24/10/2017	3 years	December 2017	19 months
73	West Oxfordshire District Council	Cote Road, Aston	15/01550/OUT	28/04/2016	41	50%	Mears Group	17/0782/RES	20/10/2017	5 years	January 2018	21 months
74	West Oxfordshire District Council	Burford Road, Witney	14/1215/POP	25/08/2016	260	40%	BDW Homes	17/03338/RES	02/02/2018	2 years	April 2018	20 months
75	West Oxfordshire District Council	New Yatt Road, North Leigh	15/01934/OUT	02/11/2016	76	50%	Bellway Homes	17/02463/RES	13/03/2018	2 years	March 2018	16 months
76	West Oxfordshire District Council	Former Stanton Hardcourt Airfield	16/01054/OUT	06/08/2017	50	50%	Hayfield Homes	18/01611/FUL	22/01/2019	3 years	April 2019	20 months
77	Wycombe District Council	Barn Road, Longwick	14/06956/OUT	19/05/2016	160	40%	Bellway Homes	17/00691/REM	19/10/2017	3 years	December 2017	19 months

The Site Delivery table records Gladman outline planning applications that were approved or allowed at appeal during the period 01.04.2016 to 31.03.2021, and for which the associated development has since commenced.

Through strong relationships with our housebuilder clients, we can accurately record when development has commenced on site. This enables us to calculate the time taken for development to commence following the grant of outline planning permission for each application. As a result, we can determine how quickly Gladman sites begin delivering housing numbers once outline planning permission is granted.

Across these applications, both the average and most common timescale from the grant of outline planning permission to the commencement of development is calculated at 24 months, illustrating a strong track record of delivering sites quickly.



Our ref: TA/GM10710/LET-001

Date: 18 August 2022

Your ref:

Paul Roberts  
Gladman Developments Ltd  
Gladman House  
Alexandria Way  
Congleton  
Cheshire  
CW12 1LB

Sent by email: [P.Roberts@gladman.co.uk](mailto:P.Roberts@gladman.co.uk)

Dear Paul,

### **Hempsted Lane, Gloucester- Ecological Statement (CONFIDENTIAL)**

Wardell Armstrong LLP (WA) have reviewed the comments provided by the Local Planning Authority (LPA) and third parties. This letter details our response to such comments where required. Confidential information is detailed within this letter and should not be published in the public domain without redactions.

### **Precautionary Working Method Statement**

We agree with the LPA comments and recommend WA update the great crested newt (GCN) Precautionary Working Method Statement to take into consideration the common toad and include the statement *'ECoW will be a GCN licenced ecologist or accredited agent'*. A reptile PWMS has been provided within Appendix 9 of the Wardell Armstrong (June 2022) GM10710-009 Land off Hempsted Lane, Gloucester, Ecological Impact Assessment. Therefore, we consider no further updates to the GCN PWMS for reptiles are required.

### **Bat Surveys**

Bat Activity surveys and automated detector surveys have been undertaken in 2022 by WA and are ongoing. Bat activity surveys and automated detector surveys have been undertaken once per month between May-August 2022. Due to the timing of instruction, an activity





survey was not undertaken in April however, it is not considered a significant limitation to the surveys due to the low levels of activity identified within the site. Activity surveys have been undertaken on the following dates:

- 3<sup>rd</sup> May 2022
- 6<sup>th</sup> June 2022
- 4<sup>th</sup> July 2022 -5<sup>th</sup> July 2022
- 1<sup>st</sup> August 2022

The bat activity surveys undertaken in 2022 have identified low levels of bat activity across the site by common pipistrelle, soprano pipistrelle, Noctule and Myotis sp. Bat activity was concentrated along the hedgerows H3, H5 and H7 within the site and the stream bordering the site to the south. Activity identified was foraging and commuting behaviour.

The automated detector surveys have identified low levels of common pipistrelle, soprano pipistrelle, Nathusius' pipistrelle, Myotis sp., Noctule bat, lesser horseshoe, greater horseshoe, Leisler's bat, serotine and long eared sp. within the site. The most frequently recorded species was common pipistrelle. No bats were recorded within 30 minutes of sunrise/sunset.

The mature trees located within hedgerows 6 and 7 were categorised as having negligible bat roost potential during the updated walkover survey undertaken by Wardell Armstrong in 2022. Therefore, it is considered that no further assessments are required. Trees T3 and T5 as labelled within the Tree Protection Plan (drawing number GM10710-018) are located within hedgerows H3 and H5. These trees were categorised as having moderate bat roost potential during the updated walkover survey undertaken by Wardell Armstrong in 2022. Both trees have been subject to two emergence/re-entry surveys undertaken on 3<sup>rd</sup> May 2022 (emergence) and 20<sup>th</sup> May 2022 (re-entry) where no bat roosts were identified. Therefore, it is considered no further surveys are required to inform the planning application and the trees can be removed/pruned as required.

### **Biodiversity Net Gain**

The biodiversity net gain assessment was undertaken by Gladman (Gladman (2022), Land off Hempsted Lane, Gloucester, Biodiversity Net Gain Assessment). Wardell Armstrong have reviewed the biodiversity net gain assessment V01 dated 20.07.2022 to enable us to provide comment on this aspect of work. Upon review of the Defra metric spreadsheet prepared on 1<sup>st</sup> April 2022 by Henry Gunning (Gladman) we can confirm the 3.1 Defra Metric spreadsheet states a **3.92 gain (31.81%)** in hedgerow units and the biodiversity net gain assessment report



confirms this figure. Therefore, it is considered no further amendments to the biodiversity net gain assessment is required and therefore condition 3 is not required.

### **Third Party Responses**

A number of third-party responses have been provided to Wardell Armstrong for review and comment in document titled *'Ecology- Third Party Responses'* dated 16<sup>th</sup> August 2022. Wardell Armstrong have reviewed the comments and we provide our responses below.

#### General impact

Habitats on site are of limited value for wildlife as detailed within the ecological assessments prepared by Wardell Armstrong (Wardell Armstrong (June 2022) GM10710-009 Land off Hempsted Lane, Gloucester) and Gladman (Gladman (2022), Land off Hempsted Lane, Gloucester, Biodiversity Net Gain Assessment). The proposals for the site include the creation of greater value habitats for wildlife along the southern boundary of the site. This is detailed within the biodiversity net gain assessment prepared by Gladman (2022).

#### Arboriculture

There are no beech trees within the red line boundary or outside the red line boundary (but within influencing distance of the site) for the site. The only trees located within the red line boundary (and outside the red line boundary but within potential influencing distance of the site) on the western boundary of the site near Rea Lane are tree T7 (ash) and tree group G5 (plum and ash). These trees will not be impacted by the outline application for the development. There are no tree removals required to enable the Outline application.

Hedgerows are to be retained, apart from where the access into and through the site is proposed, where partial removal of hedgerows is required. The hedgerow removals are kept to a bare minimum, with this totalling 95m in length. There is 1,336m of hedgerow within and on the boundaries of the site. The removals are 7.1% of the total hedgerow length. New tree and hedgerow planting as part of a landscaping scheme for the Reserved Matters application would compensate for the partial loss of hedgerows.

#### Great crested newts

The site and ponds within 500m of the site have been subject to assessment for great crested newt (GCN) between 2019 and 2022.

Environmental DNA surveys were scheduled to be undertaken in 2022 of the pond 6 within the site. However, during the survey the pond was found to be dry (during the GCN breeding



season) and therefore, was considered to be an unsuitable breeding pond for GCN. Suitable habitat for GCN within the site are limited to the hedgerows and field margins. A GCN precautionary working method statement (PWMS) has been produced to avoid impact on these species during vegetation clearance and earth works within the site. If GCN are found during the works, the works must cease, and a Natural England European Protected Species (EPS) mitigation licence will be applied for.

Access to ponds outside of the site were not available during the 2022 surveys. Therefore, assessment of all ponds within 500m of the site was not possible.

### Bats

Bat activity surveys and automated detector surveys have been undertaken in 2019 and updated in 2022 (ongoing). Presence/Absence surveys of trees 3 and 5 were undertaken in 2022 as detailed above. No bat roosts were identified in Trees T3 and T5 within the site. Activity surveys and automated detector surveys identified low levels of activity within the site which were concentrated to the hedgerows throughout the site. Bat activity within the site includes foraging and commuting only. The proposals include the retention of hedgerows and trees around the boundary of the site. The landscaping plan also includes the creation of habitats within the south of the site, these habitats will be of greater value for bats than those that are currently present on site.

### Owls/Birds

The site consists of cropped arable fields with hedgerows with mature trees and a pond. The site is considered to have low foraging suitability and negligible roosting opportunities for barn owl and tawny owl. Tawny owl has been identified south of the site during a bat survey undertaken by Wardell Armstrong on 20<sup>th</sup> May 2022. No records of owls and no owls have been identified within the site during surveys undertaken by Wardell Armstrong between 2019 and 2022. Therefore, it is considered no further mitigation or assessment for these species are required.

We are unable to provide comment on flood risk to the Barn Owl Rescue Centre.

Common and widespread bird species have been identified within the site. It has been recommended in the EclA (Wardell Armstrong (June 2022) GM10710-009 Land off Hempsted Lane, Gloucester) to undertake vegetation clearance outside of the nesting bird season



(March-August inclusive) or if this is not possible then a nesting bird check to be undertaken by an experienced ecologist 28 hours before works commence. Suitable habitat creation to support nesting birds is proposed within the south of the site. No further assessment or mitigation is required for these species.

#### Deer

Deer have been identified within the site during the surveys undertaken in 2022 by Wardell Armstrong. Deer are protected under the Deer Act 1991 which makes it an illegal offence to take, kill and intentionally injure deer or the attempt to do so. Therefore, it is considered no further assessment or mitigation is not required for this species. Precaution should be taken during the works to avoid intentionally injuring deer.

#### Badger

[REDACTED]

#### Roman Snail

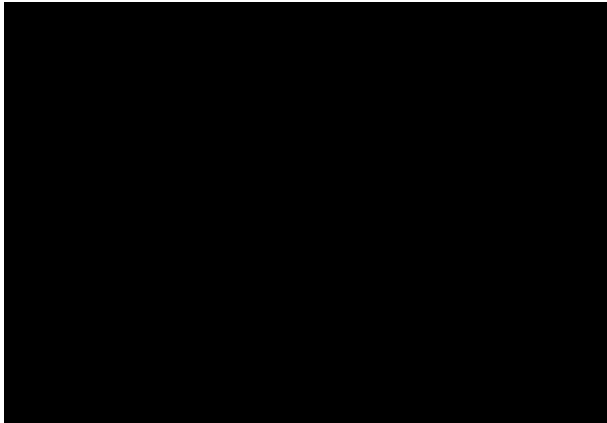
In the UK Roman snails have a limited distribution and are mainly found in southern England with particular hotspots associated with the Chilterns, North Downs and Cotswolds. Roman snails are typically found within calcareous grassland with scrub, woodland edges and hedgerows and on site with limestone geology. They can be found occasionally within field margins. Calcareous grassland and woodland is not present within the site and the site is not in a limestone location. No records of roman snail have been returned by the local record centre for the site or within 2km of the site. Roman snail has not been identified during surveys undertaken by Wardell Armstrong between 2019 and 2022. Therefore, it is considered that no further assessment is required.



We believe the above should answer all ecological queries that have been raised by the LPA and local community however, if you require any further clarification to support the planning application please don't hesitate to get in touch.

**Yours sincerely**

**for Wardell Armstrong LLP**





## Socio- Economic Benefits Summary Statement

Gladman is seeking outline planning permission for a residential development on land off Hempsted Lane, Gloucester. The description of development proposed up to 245 dwellings. However, it is intended that a planning condition would be attached to any permission to restrict the number of dwellings to 185 dwellings. Therefore, this Socio- Economic Benefits Summary Statement considers that the proposed development will provide up to 148 dwellings and 20% affordable housing. This page provides a summary of the report's findings setting out the economic benefits envisioned as a result of this scheme's realisation.

### **Estimated Construction Spend**

- A construction spend of **£19.6 million**, contributing significantly to GDP.

### **Full Time Equivalent Jobs Supported**

- **167** FTE direct construction jobs, and **182** FTE indirect jobs in associated industries available for local workers over the 4 year build-out period, benefitting the Local Planning Authority (LPA) with their specialist skills and enabling long term local job and apprenticeship opportunities.

### **New Residents**

- Development of up to 185 dwellings residential dwellings could be home to **444** new residents.
- **279** new residents of working age **232** of whom would be in employment
- Residents could generate total gross expenditure of **£7.03 million** per annum

### **Benefits to the Local Authority**

- New Homes Bonus payment of **£1 million** over a 4 year period
- Council Tax payments of approximately **£3.1 million** over 10 years
- **£565,730** in Section 106 Contributions to be spent on the local community
- A CIL receipt