



Appeal Decision

Inquiry held on 13 – 15 December 2016

Site visit made on 13 December 2016

by **Phillip J G Ware BSc(Hons) DipTP MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 24 February 2017

Appeal Ref: APP/U1620/W/16/3149412

Land to the south of Winnycroft Lane and north of the M5 motorway, Matson, Gloucester

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for outline planning permission.
 - The appeal is made by Barwood Development Securities Ltd against Gloucester City Council.
 - The application Ref 14/01063/OUT, is dated 5 September 2014.
 - The development proposed is the erection of up to 420 dwellings and community space/building as well as associated landscaping, public open space, access, drainage, infrastructure, earthworks and other ancillary enabling works.
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Procedural matters

1. The proposal is in outline with only the means of access to be determined at this stage, along with the principle of the development.
2. A fully drafted Unilateral Planning Obligation (UPO) was discussed at Inquiry, without prejudice to the positions of the parties. A final version¹ was submitted after the close of the Inquiry. It was agreed that no further comments were necessary on the final UPO, as all parties had set out their views at the Inquiry.
3. After the close of the Inquiry the Government published a Housing White paper entitled "Fixing our broken housing market". The main parties were consulted on this document. The Council did not respond. The appellants noted that this is only a consultation document although the White Paper focusses on delivery, which emphasises the need for any permission to be demonstrably capable of being viably developed². I have taken this response into account.

Decision

4. The appeal is allowed and planning permission is granted for the erection of up to 420 dwellings and community space/building as well as associated landscaping, public open space, access, drainage, infrastructure, earthworks and other ancillary enabling works on land to the south of Winnycroft Lane and north of the M5 motorway, Matson, Gloucester, in accordance with the terms of

¹ Document 12

² Document 14

the application, Ref 14/01063/OUT, dated 5 September 2014, subject to the conditions set out in the Schedule to this decision.

Applications for costs

5. At the Inquiry applications for costs were made by Gloucester City Council against Barwood Development Securities Ltd, and by Barwood Development Securities Ltd against Gloucester City Council. These applications are the subject of separate Decisions.

Main issues

6. The position of both parties is, unusually, that planning permission should be granted. However their respective positions in relation to the inclusion of an affordable housing element differs – as will be explained below.
7. With that background the main issue in this case is the level to which the development should include affordable housing and whether there should be a review mechanism, in the light of the viability of the development.

Reasons

The site and the history of the proposal

8. The appeal site is a broadly rectangular area of c.20 hectares of Grade 3B³ pastureland on the south-eastern edge of Gloucester. It is in Flood Zone 1. There are a number of trees on the site subject to Tree Preservation Orders, although the illustrative plans show none being removed. A number of public rights of way cross the land. Beyond the M5 motorway to the east the area forms part of the Cotswolds Area of Outstanding Natural Beauty.
9. The application was originally submitted in September 2015, and was the subject of a substantial amount of additional information. This is set out in detail in the Statement of Common Ground (SOCG)⁴.
10. In December 2015 and again in April 2016 the Council resolved to grant planning permission subject to the provision of 20% affordable housing (amongst other matters). Following the lodging of the appeal against non-determination, the Council resolved (July 2016) to present evidence at the Inquiry and seek not less than 10% affordable housing and a review mechanism.

The position of the parties

11. There is agreement between the main parties on all site specific matters, including access and the full range of illustrative material. I have no reason to disagree with that established position, as set out in detail in the SOCG.
12. The completed UPO provides for a range of matters, most of which are agreed between the parties and again there is no reason to disagree with that position. There are three exceptions – the police contribution, the County Council monitoring fee, and the affordable housing element. These are all included in the UPO, but there is a 'blue pencil clause' allowing for some, all or none of

³ It is therefore not within the definition of Best and Most Versatile agricultural land

⁴ Submitted before the Inquiry

these elements to be struck out in this decision⁵. I will address each of these matters when dealing with the UPO below.

13. The Council emphasises the national need for affordable housing, which finds expression in the emerging Gloucester, Tewkesbury and Cheltenham Joint Core Strategy (JCS), which is undergoing examination in public.
14. The Council considers that the proposed housing is needed and the authority wishes to see it delivered, especially in the light of the absence of a five year housing land supply. The Council therefore supports the allocation of the site for housing in the emerging JCS and has resolved to grant planning permission for the appeal scheme – subject to the provision of not less than 10% affordable housing. The Council’s position is that 20% might be achievable.
15. The Council’s position on the appeal is therefore that I should issue a ‘minded to approve’ letter which would require the completion of a UPO which would secure not less than 10% affordable housing – no specific figure was put forward. In the alternative, if such a letter and UPO were not forthcoming, the authority considers that the appeal should be dismissed, although it was accepted that this would result in a substantial and regrettable delay in housing delivery.
16. The appellant’s position is that the development is unviable if it includes any affordable housing. The completed UPO includes provision for affordable housing, but the appellant requests that this be struck out using the ‘blue pencil’ clause. The appellant considers that planning permission should be granted and that the development should go ahead without any affordable housing.

Policy context

17. Due to local authority boundary changes, the site is not covered by any adopted plan. There is no emerging or adopted Neighbourhood Plan.
18. Since 2012 the area has been included in various Council documents as part of a wider site considered suitable for residential development⁶ and it is included in the Council’s housing trajectory. However, although the Council’s calculations at the JCS Hearings presumed the delivery of housing on the appeal site, it was not originally allocated in the emerging plan.
19. In the light of the Council’s resolutions to grant planning permission, the site has now been identified by the Council in Main Modifications to the JCS as a strategic housing site. It was confirmed at the Inquiry that the Council intends to allocate the appeal site as such regardless of the decision on this appeal.
20. The JCS Inspector considered that the wider Winnycroft site was unlikely to bring forward affordable housing at the expected level. An overall uplift of 5% was applied across the JCS area to ensure the delivery of additional affordable housing.
21. The progress of the emerging JCS is important in that the parties agree that, until the JCS is adopted, the Council cannot demonstrate a five year housing land supply and paragraph 49 of the Framework is therefore triggered. The

⁵ Document 12 Paragraph 4.2

⁶ SOCG 3.6.2-3.6.5

presumption in favour of sustainable development in paragraph 14 of the Framework is agreed to apply.

22. The parties have identified the relevant policies in the JCS⁷ to which weight should be attributed in accordance with paragraph 216 of the National Planning Policy Framework (the Framework). The key policy related to the viability issue is SD13, dealing with affordable housing. This provides that, on sites of 10 or more dwellings, 40% affordable housing will be sought. The policy also allows for viability assessments, and the supporting text further explains the viability position. The Council agreed that, if the conclusion on viability shows that the development cannot afford to provide affordable housing, then the proposal would not be in conflict with JCS policy SD13 or national policy.
23. In addition the Council made reference to emerging JCS policy SD12. This seeks mixed and balanced communities in relation to, amongst other matters, tenure. The appeal scheme would provide a mixed community in terms of family size and composition. What it would not do, taking the appellant's position, is provide an element of affordable housing but, after some discussion at the Inquiry, the Council agreed that this emerging policy did not require a mixed community solely within the boundaries of a particular development site. This is of significance as the wider area is varied in socio-economic terms, and includes a significant amount of affordable housing⁸. The Council's position on JCS policy SD12 was stated to be that, even if the proposal were considered to breach the policy, this harm would not outweigh the benefits of the development⁹.
24. There was no site specific viability assessment before the JCS Inspector to demonstrate the likely ability of the appeal site to provide affordable housing, and the only exercise encompassed a much wider area. It is clear that any future allocation of the site in the emerging JCS would not automatically imply that a development on the appeal site could or should provide affordable housing – the Council accepted at the Inquiry that this must be assessed on specific viability evidence.
25. For this reason, the question of the viability of the scheme in relation to the provision of affordable housing remains the only issue between the parties and I will now turn to consider it.

Viability – background matters

26. The appellants made numerous references to the Council Committee's consideration of the proposal at various stages, and the fact that the decision of Council Members did not accord with the professional planning and valuation advice which had been given. However what is central to the appeal is the extent to which the parties supported their position with evidence, rather than the process which led them to their positions.
27. In a similar vein, the Council referred to a number of proposals for affordable housing which the appellants made before the Council's decision in April 2016. However these proposals were made at various times during the process of negotiation with the Council, and do not greatly assist me in considering the evidence at the appeal.

⁷ SOCG 4.2.13

⁸ CD 1.20

⁹ Mrs Meneaud paragraph 10.12 and in xx

28. There was an extent to which the Council's case¹⁰ was that, because other developments in the area had provided affordable housing (to varying levels) it would stand to reason that a greenfield development of this scale must similarly be able to provide an element of affordable housing. However this approach does not equate to a proper consideration of the viability of the appeal scheme, especially as I had little evidence about these other developments.
29. The parties signed a Statement of Agreed Valuation Facts (SAVF)¹¹ before the viability evidence was heard. This very useful document confirmed agreement on a number of important matters including the use of the Residual Valuation approach and Benchmark Land Value. In some instances, the SAVF also identified differences between the parties, but was nevertheless useful in clarifying the respective positions. However there was one aspect – average revenue value – where the Council's witness on the matter then departed from the SAVF. I will deal with this matter below.
30. As can be seen from the SAVF, there is a difference between the parties on costs – abnormals and infrastructure. However, given the scale of the difference in relation to other matters, this is not particularly significant.
31. The key matters in dispute between the parties are:
- Revenue values and the issue of incentives
 - Site coverage and unit sizes
 - Cashflow and finance

I will deal with these in turn below.

Viability – revenue values and incentives

32. The SAVF stated that the Council agreed that £212 psf was the average revenue value (the appellant's position was £207 psf). But following questions from the appellant's advocate and myself, the Council's witness stated that he considered a figure of £221 psf was preferable (as was set out in his original assessment). During the Inquiry, he put forward even higher figures (up to £233 psf), however none of these figures were included in the Council's closing submissions.
33. This conflicting evidence from the Council was unhelpful, but it is nevertheless important that I consider the evidence for any Council figure above the £212 psf figure in the SAVF.
34. The Council's £221 psf figure was first suggested as an arguable position in rebuttal evidence. However this figure assumed a significant change to the dwelling mix – namely the omission of 3 and 2.5 storey housing. This omission does not appear to be justified because housing of this height was included without objection in the Masterplan and in the Design and Access Statement. The Council's planning witness confirmed at the Inquiry that she could not suggest any reason why a reserved matters application including this height of development would be resisted by the authority.

¹⁰ Particularly in closing submissions

¹¹ Document 3

35. It seems likely that any application for approval of details would include development of this height, as the appellant's unchallenged evidence was that there would be market demand for such units. There was no evidence which justified the omission of the 3 and 2.5 storey housing. The conclusion is therefore that there is no evidence to exceed the £212 psf figure publically accepted by the authority.
36. There is an underlying concern with the approach of the Council to revenue values. Although it was not clear from the evidence, it emerged at the Inquiry that some of the material which had been submitted as average sales prices should in fact have described them as asking prices. Leaving aside the apparent error in the description of these values, the problem with asking prices is that they give only a general indication of the price actually obtained. In contrast the appellant's position and supporting material is internally consistent and supported by the clear evidence of achieved prices by those knowing the local market.
37. The Council criticised the appellant's position in that the evidence was not presented as a formal valuation. However the appellant's evidence is clear and I would not expect to see a formal valuation for the purpose of a planning Inquiry.
38. In part the supporting evidence to the appellant's case relies on a 'comparable' development at The Oaks, which the Council criticised as being materially different to the appeal scheme. However The Oaks is relatively close to the appeal site, is similarly located on the edge of the built up area, and appears from the evidence to be part of the same market area. It is rare that a development put forward as a comparable will reflect all the characteristics of a proposed scheme and I saw a number of differences between The Oaks and the appeal proposal, particularly in terms of scale and access. However I am persuaded that it represents the best comparable put forward by the parties, and supports the appellant's position of £207 psf.
39. There is also a disagreement between the parties as to the usefulness of Land Registry (LR) figures in terms of ascertaining the actual price paid, and the extent to which LR figures include incentives. The evidence of the parties' witnesses differed as to the extent to which LR figures represent the actual price paid, and the Council's witness differed from the co-author of his report who stated that a 2.5% discount should be applied to reflect incentives. I note that the LR guidance note¹² states that entries are based on information provided to them, is not verified by the LR and may not represent the complete picture. It also states that certain incentives, such as legal and moving costs, are not treated as discounts. Furthermore the Council's witness stated that it was not in the interests of housebuilders or those purchasing houses to declare the net figure to the LR, as this could be commercially damaging.
40. The balance of the evidence is that the LR figures are not a wholly reliable guide to the prices paid, and should be discounted. If a 2.5% discount were applied to the Council's £212 psf figure, this coincidentally results in the appellant's £207 psf figure. This approach had been adopted by the co-author of the report on which the Council relied.

¹² Document 2

41. For the above reasons, the clear balance of the evidence is that the appellant's average value of £207 psf should be adopted for the viability appraisals.

Viability – site coverage and unit sizes

42. There are a number of aspects of site coverage which were discussed at the Inquiry but where the extent of the difference is not material. For example the appellant's change in site coverage during the evolution of the scheme was accepted by the Council to increase the viability of the development rather than decrease it, as had been first considered by the authority.
43. The main difference between the parties relates to unit sizes. An element of the Council's evidence was based on Barwood Homes unit sizes, but this was not pursued when it was explained and accepted by the authority that the appellants are a different entity and that Barwood Homes are most unlikely to be the eventual developer.
44. The parties broadly agreed the appropriate unit sizes for two and three bed units, but there is a very considerable difference in relation to the size of the four bed units. As was accepted by the authority at the Inquiry, the Council's figures contain a substantial typographical error – the four bed figures are given as 2,131 sq.ft. when in fact they are 1,131 sq.ft. This error was then fed into the Council's modelling and conclusions.
45. The effect of this error is very significant. The appellant stated that it results in a fall in revenue of £2.98m and that the bottom line effect of that single error reduces the affordable housing potential by around 5%. Those figures were not contested by the authority but, even if the precise figures varied to an extent, it is clear that this error significantly detracts from the Council's position.

Viability – cashflow and finance

46. The delivery trajectory is not agreed by the parties and this consideration makes a significant difference to the cashflow and finance costs, and hence the viability of the development. The consequence of the difference between the assessments is very considerable. It is best illustrated in the SAVF which shows (for example) a difference of c.£3.4m in finance costs (at 10% affordable housing).
47. To a great extent this arises from the different approaches adopted by the parties. The appellant has used a scheme-specific cost plan and cashflow. This used known trigger points for infrastructure and contributions arising from the UPO. In contrast the Council used the default 'S' curve in the Argus software package which, as I will summarise below, produces a number of difficulties in relation to this scheme.
48. As a general principle, the use of a scheme-specific cashflow is likely to be more accurate than a standard package. This is especially the case when, as in this case, the appellant's specific cashflow approach is not substantially challenged. The Council's approach exhibits a number of flaws, which were explored at the Inquiry. The most important of these are as follows:
- The Council's cashflow assumed a 10 month period from site acquisition by a housebuilder (with the benefit of only an outline planning permission) to the first residential sales. This is an exceptionally short period to deal

with all the reserved matters, discharge all the pre-commencement conditions, and provide the necessary infrastructure. Despite questioning, this highly optimistic suggestion was not supported by any examples where such a timetable has been achieved. If the time period were extended, there would be a consequently longer period when costs were being incurred and financed before any income is received.

- The Council's calculations show more units being sold in months 10 – 15 (i.e. 42 units) than is covered by expenditure – which only provides funding for the construction of 12 units. The Council produced a new table¹³ which sought to support the original cashflow. However this continued to exhibit the same problem – too little cost being expended near the start of the development in comparison to the revenue apparently flowing from the sale of the units. This would have the effect of artificially increasing the viability of the development.
- The infrastructure costs appear too late in the Council's assessment. These are known costs and timings, and the appellant's appraisal correctly includes them in the earlier stages of the development.
- There is a flaw in the Council's cashflow in relation to the costs included in the UPO. The Council's model shows these as £103,000, whereas in fact they are £929,000, payable on commencement. The Council confirmed the accuracy of the higher figure at the Inquiry and there was no real explanation as to why the authority's valuation witness had apparently been given such a substantially incorrect figure by those instructing him.
- Finally, the appellant's witness stated in cross-examination that he would approach the cashflow in the way adopted by the appellant if he had been instructed by a housebuilder. It is unclear why he took a different approach simply because he was instructed by the authority.

Viability – conclusion

49. Overall, the Council's viability appraisal, aimed at demonstrating that the development would be able to support at least 10% affordable housing, suffers from a number of flaws, as summarised above. In particular the cash flow bears little resemblance to the reality of scheme development, including phasing of infrastructure costs, there are a number of internal contradictions in the evidence, and there are a number of admitted errors which rob the Council's modelling of much of its credibility. In contrast the appellant's appraisal, which demonstrates that the scheme cannot sustain an affordable housing element, is based on clear and often unchallenged evidence. It is clear from the evidence that the scheme cannot support affordable housing.
50. There was another matter which was raised by the Council in its resolution to oppose the appeal. That is whether the development should include any form of review clause. However no evidence was given by the Council on this matter, whereas the appellant's evidence drew attention to the advice in Planning Practice Guidance which is that viability should be assessed at current costs and values. No evidence has been put forward to suggest that this is a scheme where changes in the value of development and changes in costs of

¹³ Document 4

delivery should be considered. In the absence of evidence to the contrary, there is nothing to suggest that a review clause should be included.

Planning Obligation

51. The draft of the UPO was made available to the Council well before the Inquiry, and the authority made written legal submissions on the enforceability of the draft¹⁴. Perhaps the key criticism was that the obligation purported to impose reciprocal covenants on the Council. These concerns were discussed at the Inquiry and the resulting final UPO was in a more 'Grampian' style and addressed these concerns. The final UPO was not the subject of further concern by the Council on that basis.
52. The final UPO contains a wide range of provisions, as might be expected for a development of this size. The majority of these provisions are not contested by any party and are the subject of CIL Compliance Statements¹⁵ in relation to education and libraries, and highways and transportation matters. This uncontested evidence is persuasive and, save for the elements discussed below, I conclude that the UPO meets the policy in paragraph 204 of the Framework and the tests in Regulation 122 of the Community Infrastructure Levy Regulations 2010. I have therefore taken it into account and given weight to those matters which go beyond mitigation related to the impact of the development.
53. I will now turn to those elements of the UPO which are the subject of dispute and which the appellant has invited me to strike out from the completed UPO.

Police contribution

54. Gloucestershire Constabulary seek a phased payment totalling £156,409 related to additional demands on police services¹⁶. Neither the appellant nor the Council support this request as they considered it to be a pooled approach unrelated to the development.
55. The statement from the police explains the perceived consequences arising from the additional dwellings, and sets out the impacts this could have. This is said to be based on empirical data and a specific figure (£156,409) has been provided as contributions to a range of matters ranging from personal equipment for staff, contributions to the Police National Database, and premises. Many of these matters are based on the proposed increase in population to calculate the size of contributions. However, this is not based on policy or any Supplementary Planning Document and it is not clear that there would be an adverse effect that needs to be mitigated. Nor is there a clear link in some instances between the proposed development and the mitigation – it is not demonstrated that a number of the proposed mitigations would be directly related to the development or fairly and reasonably related in scale and kind to it.
56. Therefore I consider that this element of the UPO does not meet the policy in paragraph 204 of the National Planning Policy Framework or the tests in Regulation 122 of the Community Infrastructure Levy Regulations 2010. This

¹⁴ Document 7

¹⁵ Documents 6 and 11

¹⁶ Document 9

element of the UPO should be severed from the deed in the context of Paragraph 4.2 of the document.

County Council monitoring fee

57. The County Council seeks a monitoring fee of £6,000 (in addition to a separate Travel Plan monitoring fee). This is the sum set out in the UPO – subject to the ‘blue pencil’ clause. The County Council’s statement¹⁷, amplified at the Inquiry, sets out the background to the request. The appellant’s position is that this is not a reasonable figure for “processing five cheques”¹⁸ – however the Council persuasively explained that the work to be undertaken was appreciably more than that.
58. In my judgement, the proper monitoring of the UPO is necessary to make the development acceptable in planning terms, and this falls outside the Council’s reasonable everyday functions. The amount sought has been comprehensively justified, and this element of the UPO should not be severed from the deed in the context of Paragraph 4.2 of the document.

Affordable housing

59. The final ‘blue pencil’ clause relates to the affordable housing element in the Second Schedule of the UPO. For the reasons set out above, I consider that this element of the submitted UPO does not meet the policy in paragraph 204 of the National Planning Policy Framework or the tests in Regulation 122 of the Community Infrastructure Levy Regulations 2010. This element of the UPO should be severed from the deed in the context of Paragraph 4.2 of the document.

Conditions

60. A wide range of conditions was agreed between the parties and discussed at the Inquiry. I am satisfied that these all meet the tests in the Framework, are necessary, and are fairly and reasonably related to the development.
61. A number of initial conditions are necessary for clarity related to plans and the submission of details (1-4, 35). These details should be in broad accordance with the illustrative plans, in the interests of the appearance of the development and highway safety (5). The development would be undertaken in phases and a phasing plan needs to be submitted for approval, so as to inform some subsequent conditions (6).
62. In the interests of highway safety, amenity and pollution control, a Construction Method Statement needs to be agreed (7). For the same amenity reason, the hours of construction need to be controlled (8).
63. The development incorporates considerable areas of landscaping and planting. The details and management of these areas need to be submitted for approval in the interests of the appearance of the development (9-12).
64. In the interests of ecology a site-wide ecological management plan and more detailed plans for each phase need to be submitted for approval (13-14). To protect nesting birds there should be controls over tree and hedge removal

¹⁷ Document 8

¹⁸ Schedule of S106 commitments

(15). To encourage awareness of local ecology, a condition is necessary related to the provision of information (16).

65. Parts of the site are affected by noise from the M5 motorway and, to a lesser extent, from surrounding roads. To protect the occupiers of the development noise mitigation and controls are necessary (17-20).
66. A programme of archaeological work needs to be submitted for each phase of the development, for heritage reasons (21).
67. To protect health a contamination risk assessment and remediation arrangements are necessary for each phase of the development (22-25).
68. A range of highway conditions are needed to ensure highway and personal safety. These include highway improvements to surrounding roads, by way of a 'Grampian' style condition, and the provision of accesses (26-33).
69. So as to prevent contamination or flooding a strategy for foul and surface water drainage across the entire site needs to be submitted for approval (34).

Conclusion

70. The appeal clearly engages paragraph 14 of The Framework, such that planning permission should be granted unless the adverse consequences of doing so would significantly and demonstrably outweigh the benefits. This position is common ground between the parties.
71. The benefits arising from the development are agreed by the parties¹⁹ and particularly include:
 - The provision of new market homes in a range of sizes (although the Council maintains its position on the need for affordable homes).
 - Areas of green space, public open space, orchard and allotments, and play facilities.
 - Enhanced footpath links across the site.
 - A boost to the local economy.
 - Increased spend from new residents.
72. There is no development plan covering the site. The emerging JCS includes two relevant policies. JCS policy SD13 deals with the provision of affordable housing, and makes specific reference to viability considerations. The Council agree that, if the conclusion on viability shows that the development cannot afford to provide affordable housing, then the proposal would not be in conflict with this policy. For the above reasons, the viability evidence clearly shows that the development cannot support affordable housing, and therefore this policy is not breached. JCS policy SD12 deals with social mix, although the Council confirmed that it does not require that every development should provide a mix of tenure. In any event, even if this policy were considered to be breached, which I do not consider to be the case, the Council's position is that such harm would not outweigh the benefits of the proposal.

¹⁹ SOCG 5.4.1

73. Part of the Council's case was that permission should be refused even if the viability work clearly demonstrates that the development cannot support affordable housing. This is not the approach taken by the Framework or the Council's emerging policy and would delay or prevent development which should be approved.
74. In conclusion the evidence is clearly that the proposal should not include affordable housing in the light of the viability evidence. It should be allowed without the affordable housing element and the police contribution in the UPO.
75. For the reasons given above I conclude that the appeal should be allowed.

P. J. G. Ware
Inspector

Schedule of conditions

Land to the south of Winnycroft Lane and north of the M5 motorway, Matson, Gloucester

Plans

1. Approved Plans

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

- Site Location Plan (Drawing Reference EDP 1806/15)
- Site Location & Site Boundaries Plan (Drawing Reference EDP 1806/64a)
- Access Drawing (Drawing Reference 21099/08/020/01b)
- Access Drawing (Drawing Reference 21099/08/020/02b)

Reserved Matters and Implementation

2. Reserved Matters

Details of the appearance, landscaping, layout and scale of the site, (hereinafter referred to as the "reserved matters"), shall be submitted to the local planning authority. No development of any phase shall commence until approval of the details of the reserved matters for that phase have been approved in writing by the local planning authority. The development shall be carried out as approved.

3. First Reserved Matters Submission

The first application for approval of reserved matters shall be made to the local planning authority no later than three years from the date of this permission.

4. Commencement of Development

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

5. Development Principles

The reserved matters applications to be submitted shall broadly comply with the development principles established in the illustrative plans: EDP 1806/61a (Indicative Masterplan); Drawing EDP 1806/75 (Landscape Masterplan); EDP 1806/89b (Illustrative Density Range Plan); and Drawing EDP 1806/91c (DAS - Movement Strategy), and the principles of the Design and Access Statement (dated September 2014) (as amended in November 2015).

Phasing

6. Phasing Plan

Prior to commencement of development, a phasing plan for the site shall be submitted to the local planning authority for approval in writing. The phasing plan shall include details of the site access delivery, site highways, footways, accesses for pedestrians, cyclists and vehicles, surface water drainage, green infrastructure, a framework landscape masterplan including identification of

pedestrian links to the land at the north east boundary, play spaces (LEAP, NEAP and MUGA), sports pitches and community facilities, including the approved community building, grow park and orchard. The approved details shall be implemented in accordance with the approved phasing.

Construction

7. Construction Method Statement

No development shall take place on any phase until a Construction Method Statement has been submitted to and approved in writing by the local planning authority for that phase. The Statement shall:

- Identify the construction access arrangements
- Provide for the parking of vehicles of all site operatives and visitors on site
- Provide for the loading and unloading of plant and materials
- Provide for the storage of plant and materials used in constructing the development
- Provide details of any lighting during the construction period (security compounds etc.)
- Identify measures to control the emission of dust and dirt during construction
- Include provision of wheel washing facilities
- Set out the site security measures and temporary boundary treatments
- Provide details of trees / hedgerows to be removed or retained during construction
- Provide details of protection during construction for any trees or hedgerows to be retained
- Measures to control the risk of pollution to air, soil, controlled water, and to protect biodiversity
- Measures to avoid, minimise and manage the production of waste

The approved Construction Method Statement shall be adhered to throughout the construction period. No materials are to be burnt on site during the construction of the development hereby approved.

8. Hours of Construction

Construction works shall not take place outside the hours of 0800 hours to 1800 hours Mondays to Fridays and 0830 and 1300 hours on Saturdays, nor at any time on Sundays or Bank Holidays.

Landscape Design

10. Landscape Management Plan

A landscape management plan, including long term objectives, management responsibilities and maintenance schedules for all landscape areas other than small, privately owned, domestic gardens, for each phase of development shall be submitted to and approved by the local planning authority, prior to the occupation any building within that phase of development. The landscape management plan shall be carried out as approved.

11. Boundary Treatments

No development shall take place in any phase until there has been submitted to and approved in writing by the local planning authority a plan indicating the positions, design, materials and type of boundary treatment to be erected for that phase of development. Development shall be carried out in accordance with the approved details.

12. Replacement Planting

For each phase of development if within a period of five years from the planting scheme being implemented that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes seriously damaged or defective, another tree of the same species and size shall be planted at the same place, unless the local planning authority gives its written consent to any variation.

Nature Conservation and Ecology

13. Ecological Management Plan

No development shall take place until a site wide Ecological Management Plan (EMP) has been submitted to and approved in writing by the local planning authority. The site-wide EMP shall demonstrate how it will deliver the mitigation identified in accordance with the principles in the submitted Ecological Report from EDP (July 2014, Report Reference EDP1806_04b) as updated by the EDP Bat Survey Report (January 2015, Report Reference EDP1806_08a) and amended EDP Ecology Note (dated 12th November 2015 Reference: C_EDP1806_01_12.11.2015_kh). It shall include a timetable for implementation, and details for management & maintenance. Development shall be in accordance with the approved details and timetable in the EMP.

14. Detailed Ecological Management Plan

At the submission of the first application for the approval of Reserved Matters on each phase, a detailed ecological management plan (DEMP) for that phase, shall be submitted to and approved in writing by the LPA. It shall include based on up to date surveys for that phase: details on how the protected species will be safeguarded; details for habitat creation, enhancement or restoration. The development within each phase shall be carried out in accordance with the approved DEMP for that phase.

15. Hedge and Tree Removal – Bird Nesting Season

No trees or hedges shall be removed between 1st March and 31st August inclusive, unless a survey has been submitted to and approved by the local planning authority assessing nesting bird activity on site during this period.

16. Protection of SAC

Each householder, on first occupation of each dwelling, shall be given information relating to the accessibility of leisure and recreation facilities at Robinswood Hill.

Noise Mitigation

17. Noise Mitigation – Residential Dwellings

Development of any phase shall not begin until a comprehensive scheme for protecting the approved dwellings within that phase from noise from the M5 Motorway and from Winnycroft Lane to meet internal noise criteria specified within BS8233:2014 (or any subsequent replacement BS guidelines) has been submitted to an approved in writing by the local planning authority. The scheme shall include a plan that identifies those properties that require the noise mitigation to be in place to reach the standard. All works which form part of the scheme shall be completed prior to occupation of the properties identified.

18. Internal Noise Standards

Prior to occupation of any permitted dwellings requiring mitigation under Condition 17, noise testing should be carried out by a professional and competent contractor (Member of the Institute of Acoustics) within four mitigated properties to be agreed in writing by the local planning authority at the reserved matters stage for that phase. The purpose of the noise test will be to establish whether the noise criteria as specified in Condition 17 has been met through the approved mitigation measures. The testing procedure should be submitted to and agreed in writing by the local planning authority at least 7 days prior to noise testing being carried out.

19. Noise Mitigation – External Areas

Development shall not begin on a phase, until a comprehensive scheme for protecting external residential areas of the development site from noise from the M5 Motorway and from Winnycroft Lane, which will meet the WHO Guidelines for Community Noise 1999 (55dB(A) LAeq,16hr) has been submitted to and approved in writing by the local planning authority. All works which form part of the scheme shall be completed prior to occupation of any of the permitted dwellings.

20. External Noise Standards

Prior to occupation of any external areas requiring mitigation under Condition 19, noise testing should be carried out by a professional and competent contractor (Member of the Institute of Acoustics) within four mitigated properties to be agreed in writing by the local planning authority at the reserved matters stage for that phase. The purpose of the noise test will be to establish whether the noise criteria as specified in Condition 19 has been met through the approved mitigation measures. The testing procedure should be submitted to and agreed in writing by the local planning authority at least 7 days prior to noise testing being carried out

Archaeology

21. Programme of Archaeological Work

No development shall take place within any phase of the development until a programme of archaeological work in accordance with a written scheme of investigation has been submitted by the applicant and approved in writing by the local planning authority. Development of each phase shall be carried out in accordance with the scheme of investigation.

Ground Conditions

22. Risk Assessment

For each phase, an investigation and risk assessment, in addition to any assessment provided with the planning application, must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme are subject to the approval in writing of the local planning authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report is subject to the approval in writing of the local planning authority. The report of the findings must include:

- a survey of the extent, scale and nature of contamination;
- an assessment of the potential risks to:
 - human health,
 - property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,
 - adjoining land,
 - groundwater and surface water,
 - ecological systems,
 - archaeological sites and ancient monuments;
- an appraisal of remedial options, and proposal of the preferred option(s) This must be conducted in accordance with DEFRA and the Environment Agency's '*Model Procedures for the Management of Land Contamination, CLR 11*'.

23. Remediation Scheme

If the risk assessment identifies the need for remediation for any phase, a detailed remediation scheme for that phase to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and is subject to the approval in writing of the local planning authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must accord with the provisions of the EPA 1990 in relation to the intended use of the land after remediation.

24. Remediation Scheme - Implementation

The approved remediation scheme for any phase must be carried out in accordance with its terms prior to the commencement of development other than that required to carry out remediation, unless otherwise agreed in writing by the local planning authority. The local planning authority must be given two weeks written notification of commencement of the remediation scheme works. Following completion of measures identified in the approved remediation scheme, a verification/validation report that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval in writing of the local planning authority.

25. Unexpected Contamination

In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the local planning authority. An investigation and risk assessment must be undertaken in accordance with the requirements of

condition 22, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 23, which is subject to the approval in writing of the local planning authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the local planning authority in accordance with condition 23.

Highway conditions

26. Highway improvements

No part of the development hereby approved shall be carried out until the following matters have been delivered:

- pedestrian crossing improvements along Matson Avenue at Gatmeres Road, Munsley Grove, Hill Hay Road, St Peter's Road, Red Well Road and Winsley Road
- capacity improvements to the signalised junction of Norbury Avenue/Painswick Road, as set out in the submitted Transport Assessment (Report Reference 21099/08-14/3631 and its Addendum (Report Reference 21099/02-15/3895).

27. The details to be submitted for the approval of reserved matters shall include vehicular parking and turning for each dwelling and the dwellings hereby permitted shall not be occupied until the facilities for that dwelling have been provided in accordance with the approved plans and shall be maintained available for those purposes for the duration of the development.

28. Bus Shelter Provision

Prior to the occupation of the first dwelling on the site a bus shelter (to include seating and lighting) shall be erected at the existing stop along Matson Avenue located between the junction of Gatmeres Road and Caledonian Road on the south western bound direction in accordance with details to be submitted to and agreed in writing by the local planning authority.

29. Vehicular Accesses

No dwelling shall be occupied until the carriageway(s) (including surface water drainage/disposal, vehicular turning head(s) and street lighting) providing access from the nearest public highway to that dwelling have been completed to at least binder course level and the footway(s) to surface course level.

30. Street Management and Maintenance

Prior to the occupation of the first dwelling in any phase of the development details of the proposed arrangements for future management and maintenance of the proposed streets within that phase shall have been submitted to and approved in writing by the local planning authority. The streets shall thereafter be maintained in accordance with the approved management and maintenance details until such time as either a dedication agreement has been entered into or a private management and maintenance company has been established.

32. Development Access Works

The vehicular access shall be implemented in accordance with the timetable

approved through the Phasing Plan under Condition 6. It shall be laid out and constructed broadly in accordance with the submitted plan drawing nos. 21099_08_020_01B and 21099_08_020_02B, and shall be maintained for the duration of the development.

33. For each phase of the development as approved by the Phasing Plan under Condition 6, details of the existing and proposed site levels including details of earthworks and excavations required in connection with the re-development of the site, shall be submitted to the local planning authority for approval in writing. The development of each phase shall then be carried out in accordance with the approved details.

Drainage

34. Foul and Surface Water Drainage

The first application for the approval of reserved matters on the site shall be accompanied by a foul and surface drainage strategy for the entire application site, the strategy will follow the principles contained in the MEC Flood Risk Assessment Report dated September 2014 (Ref: September 2014: 21099/09-14/3689). No building hereby permitted within each phase of the development shall be occupied until foul and surface water drainage works have been implemented in accordance with details that have been submitted to and approved in writing by the local planning authority as part of the reserved matters applications for that phase. The information submitted shall be in accordance with the principles set out in the approved drainage strategy. Before these details are submitted, an assessment shall be carried out of the potential for disposing of surface water by means of a sustainable drainage system in accordance with the principles set out in DEFRA's non-statutory technical standards for the design (March 2015, or any subsequent replacement guidance), maintenance and operation of sustainable drainage systems to drain surface water (or any subsequent version), and the results of the assessment provided to the local planning authority. Where a sustainable drainage scheme is to be provided, the submitted details shall:

- provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving groundwater and/or surface waters;
- include a timetable for its implementation;
- provide a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker or any other arrangements to secure the operation of the scheme throughout its lifetime.

Waste Storage

35. Any reserved matters application shall include the location of the storage spaces for waste and recycling facilities associated with each dwelling. The approved facilities shall be installed before each dwelling is occupied.

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:	
Mr T Graham of One Legal	Instructed by Planning Manager, Gloucester City Council
He called	
Mr D Durden BA(Hons) CIOH(PQ)	Senior Enabling Officer
Mrs J Meneaud MA T&CP MRTPI	Principal Planning Officer
Mrs L Follett BSc(Hons) MPhil T&CP MRTPI	Principal Planning Officer
Mr C White BSc DipTP DipSurv MRTPI	Director, White Land Strategies
Ms C McDonald-Roberts	Solicitor, One Legal (S106 Obligation discussion only)
Mr N Jonathan	Solicitor, One Legal (S106 Obligation discussion only)
Ms B L Boucher FCILEx	Senior Lawyer, County Council (S106 Obligation discussion only)
Ms T Yates	Solicitor, One Legal (S106 Obligation discussion only)
Mr J Medlin	S106 Officer - Economic Development and Strategic Planning, Gloucestershire County Council (S106 Obligation discussion only)

FOR THE APPELLANT:	
Mr R Warren QC	Instructed by Bird Wilford and Sale
He called	
Mr K Fenwick BA(Hons) MRTPI	Director, WYG
Mr T Hegan BA(Hons) MRICS	Partner, Turner Morum LLP
Mrs L Marjoram LLB	Bird Wilford and Sale (S106 Obligation discussion only)

INQUIRY DOCUMENTS

1	Lists of persons present at the Inquiry
2	Extract from Land Registry website, submitted by Mr White
3	Statement of Agreed Valuation Facts
4	Cashflow table submitted by Mr White
5	Mr Hegan's response to Doc 4.
6	County Council CIL Compliance Statement (Education and Libraries Infrastructure)
7	Council's legal submissions in respect of the Planning Obligation
8	County Council statement on S106 Monitoring Fees

9	Gloucestershire Police statement on S106
10	County Council CIL Compliance Statement (Highways)
11	Unilateral Planning Obligation (21 December 2016) submitted after the close of the Inquiry
12	Council's Closing Submissions
13	Appellant's Closing Submissions
14	Appellants letter (14 February 2017) regarding Housing White Paper

CORE DOCUMENTS

1	Full suite of application documents as submitted 5th September 2014 and validated 29th September 2014:
1.1	Cover Letter
1.2	Application Forms
1.3	Application Drawings Location Plan Site Location and Boundaries Plan Illustrative Masterplan Landscape Masterplan
1.4	Landowner Notices
1.5	Planning Statement (including draft Section 106 Heads of Terms)
1.6	Statement of Community Involvement
1.7	Access Drawings Drawing 21099_08_020_01b Drawing 21099_08_020_02b
1.8	Air Quality Assessment
1.9	Geophysical Survey
1.10	Archaeological Evaluation
1.11	Archaeological Evaluation accompanying letter dated 12 August 2014
1.12	Arboricultural Baseline Assessment
1.13	Design and Access Statement
1.14	Ecological Assessment
1.15	Environmental Risk Assessment
1.16	Flood Risk and Drainage Strategy Revised Heritage Report (with amended Appendices) – September 2014
1.17	Landscape and Visual Impact Assessment
1.18	Noise Assessment
1.19	Services Report
1.20	Socio-Economic Report
1.21	Topographical Survey Topographical Survey 21099_06_170_01.1 Topographical Survey 21099_06_170_01.2
1.22	Transport Assessment
1.23	Travel Plan

2	Additional Information Submission 22nd October 2014
2.1	Revised Noise Assessment
3	Additional Information Submission 17th November 2014
3.1	Transport Assessment Revision A – dated November 2014
3.2	Travel Plan Revision A – dated November 2014
4	Additional Information Submission 15th January 2015
4.1	Waste Audit Statement – January 2015
5	Additional Information Submission 30th January 2015
5.1	Covering Letter
5.2	Drawings Drawing EDP 1807_89b (Density Range by Block) Drawing EDP 1806/90a (Sketch Vignette: Blocks 17 and 18) Drawing EDP 1806/91c (DAS Movement Strategy) Drawing EDP 1806/92 (Possible Location of Pumping Station) Drawing EDP 1806/93 (Sketch Vignette: Block 2) Drawing EDP 1806/94 (Sketch Vignette: Block 11 and 12)
5.3	EDP letter regarding Community Building
5.4	Sport England Design Guidance Note 'Village and Community Halls
5.5	Community Grow Park: Proposed Specification
5.6	Draft Conditions Schedule
6	Additional Information Submission 2nd March 2015
6.1	Transport Assessment Addendum (reference 21099/02/02-15/3895)
7	Additional Information Submission 10th March 2015
7.1	Updated Noise Assessment Covering E-Mail
7.2	Amended Noise Plans: Appendix d01 21099_04_120_01a Daytime LAeq, 16hr 1.5m Appendix d02 21099_04_120_02a Night Time LAeq, 8hr 4m Appendix d03 21099_04_120_03a Daytime LAeq, 16hr 1.5m bund and fence Appendix d04_21099_04_120_04a Night Time LAeq, 8hr 4m with mitigation
8	Additional Information Submission – 23rd June 2015
8.1	ME-C Correspondence in connection with submitted noise report – dated 23 rd June 2015
8.2	Day Time Road Emission Information
8.3	Day Time Sound Level 10m from M5 Information
9	Additional Information Submission – 26th June 2015
9.1	Noise Assessment Addendum – June 2015 (21099/06/15/3998 Rev B)

10	Additional Information Submission – 8th July 2015
10.1	EDP Letter regarding Appropriate Assessment
11	Additional Information Submission – 30th October 2015
11.1	Covering Letter regarding Pumping Station
11.2	Drawing EDP 1806-92 (Possible Location of Pumping Station)
12	Additional Information Submission – 4th November 2015
12.1	Covering E-mail regarding Sustainable Urban Drainage and proposed Play Trails
13	Additional Information Submission – 5th November 2015
13.1	Letter responding to updated Planning Policy Consultation Comments
14	Additional Information Submission – 10th November 2015
14.1	Covering E-mail
14.2	Drawings: Illustrative Masterplan (EDP/1806/61a) Existing Public Rights of Way Plan (EDP/1806/97) Proposed Footpath Plan (EDP/1806/98)
15	Additional Information Submission – 18th November 2015
15.1	Bus Link Position Statement
16	Additional Information Submission – 20th November 2015
16.1	Community Grow Park Position Statement
17	Additional Information Submission – 24th November 2015
17.1	Addendum Bat Survey Report – January 2015
18	Additional Information Submission – 26th November 2015
18.1	Design and Access Statement Addendum – November 2015
19	Additional Information Submission – 9th December 2015
19.1	EDP Ecology Addendum Note
20	Additional Information Submission – 14th December 2015
20.1	Letter Regarding Committee Options
21	Viability Matters
21.1	Turner Morum Viability Study – 13 th April 2015
21.2	Lionel Shelley Viability Study – 20 th November 2015
21.3	Turner Morum Response – 25 th November 2015
21.4	JM E-Mail setting out LPA Position – 10 th December 2015
21.5	Turner Morum Response – 11 th December 2015
21.6	PBA Viability Report – 2 nd February 2016
22	Other Relevant Application Documents

22.1	Appellant Pre Application Meeting Request – 10 th June 2014
22.2	LPA Pre Application Response Letter – 1 st September 2014
22.3	Appellant Screening Opinion Request – 12 th June 2014
22.4	LPA Screening Opinion – 7 th July 2014
22.5	LPA Application Validation Letter – 14 th October 2014
22.6	GCC Highways Response – 3 rd November 2014
22.7	GCC Environmental Health Officer Response – Undated, received 17 th November 2015
22.8	GCC Highways Response – 29 th May 2015
22.9	Freedom of Information (FOI) Request – 29 th June 2015
22.10	GCC FOI Response – E-Mail – 10 th August 2015
22.11	GCC FOI Response – Covering Letter – Undated, received 10 th August 2015
22.12	GCC FOI Response – E-Mail dated 7 th May 2015
22.13	GCC FOI Response – E-Mail dated 11 th June 2015
22.14	GCC FOI Response – Phillip Ardley Comments dated 8 th June 2015
22.15	15 th December 2015 Committee Report
22.16	Appellant’s Committee Presentation – 15 th December 2015
22.17	GCC 15 th December 2015 Committee Minutes
22.18	GCC 16 th February 2016 Committee Report
22.19	GCC 1 st March 2016 Committee Report
22.20	GCC 12 th April 2016 Committee Report
22.21	GCC 12 th April Committee Report – Later Committee Material
22.22	23 rd December 2015, Appellant Letter Post December 2015 Committee Resolution – undated
22.23	12 th April 2016 Planning Committee Minutes (to follow after publication)
23	Local Planning Policy and Evidence Base
23.1	South West RSS Revocation Order 2013
23.2	Gloucester, Cheltenham and Tewkesbury Pre-Submission Joint Core Strategy - April 2014
23.3	Cheltenham, Gloucester and Tewkesbury Submission Joint Core Strategy – November 2014
23.4	EHO104b Strategic Housing Market Assessment update paper: Impact of new objectively assessed need figures Dec 2014
23.5	JCS Exam Document 226 – JCS Housing Trajectory Update – 25 th April 2016
23.6	JCS Exam Document 119 – JCS OAN Update – September 2015
23.7	JCS Exam Doc 118 & 118a JCS SHMA Update Sept and October 2015 Section 5 A.2 Outputs for Gloucester
23.8	JCS Exam Document 146 – Inspector’s Preliminary Findings (Green Belt and Spatial Strategy) – undated
23.9	JCS Exam Document 188 – Gloucester City Housing Sites of between 200 and 500 Unit Capacity – undated
23.10	JCS Exam 232 Inspectors Interim report on the JCS 31 st May 2016
23.11	JCS Exam 248 JCS Trajectory update July 2016
25	Relevant Correspondence
25.1	Council letter dated 12 th September 2014 to Alliance Planning
25.2	Letter from Alliance Planning dated 26 th September 2014

25.3	Council email dated 3 rd October 2014
25.4	Letter from Alliance Planning dated 6 th October 2014
25.5	Email from WYG enclosing viability report dated 15 th April 2015
25.6	Lionel Shelley Final Briefing Note dated 2 nd December 201
25.7	Parkwood Consultancy report dated April 2016
25.8	Email enclosing Draft Unilateral Undertaking submitted on 4 th November 2016 and subsequent email exchange
25.9	Council planning committee report dated 5 th July 2016
25.10	Minutes of Council planning committee dated 5th July 2016
25.11	Late material for December Planning Committee 2014
26	Core Documents DJD
26.1	Planning Policy Guidance 3: Housing, 2000.
26.2	Building the Homes we Need, KPMG and Shelter (2014)
26.3	HOME TRUTHS 2015/16 - The housing market in the South West, National Housing Federation
26.4	Com- Res National Housing Federation -Affordable Housing Research
26.5	Housing Needs Assessment Gloucester City Council June 2010, Fordham Research
26.6	"Changes in real earnings in the UK and London: 2002 Office for National Statistics
26.7	Planning for housing in England: Understanding recent changes in household formation rates and their implications for planning for housing in England, Neil McDonald and Peter Williams, University of Cambridge, 2014
26.8	English Housing Survey First Time Buyers and Potential Home Owners Report, 2014-15, Department for Communities and Local Government
26.9	The Clipped Wing Generation Analysis of adults living at home with their parents, Shelter July 2014.
26.10	Homes for our Children. How much of the housing market is affordable?, Shelter April 2015
26.11	Strategic Housing, Market Assessments Practice Guidance Version 2, Department for Communities and Local Government, 2007
26.12	Local Authorities of Gloucestershire Strategic Market Assessment Final March 2014, HDH Planning and Development, 2014.
26.13	Joint Core Strategy – Gloucester, Cheltenham and Tewkesbury, SHMA, Further Update, Affordable Housing, HDH Planning and Development, September 2015
26.14	Gloucester City Council Revised Deposit Local Plan Chapter 6 – Housing, August 2002, Chapter Six: Housing
	NPPG Guidance Housing need assessment revision March 2014
27	Policy and Housing Land Supply Position Documents
27.1	JCS Exam 232 Inspector's Interim Report http://www.gct-jcs.org/Documents/Examination-Documents-Library-6/EXAM232---JCS-Inspectors-Interim-Findings---31052016.pdf
27.2	JCS Housing Implementation Strategy Draft 4 October 2016 (HIS) http://www.gct-jcs.org/Documents/New-Evidence-Base-and-Associated-Documents/JCS-Housing-Implementation-Strategy.pdf
27.3	JCS Main Modifications (October 2016) http://www.gct-jcs.org/Documents/New-Evidence-Base-and-Associated-

	Documents/SD11-SD12-SD13-Housing-Policies-MAIN-MODS.docx http://www.gct-jcs.org/Documents/New-Evidence-Base-and-Associated-Documents/SA1-Strategic-Allocations-MAIN-MODS.doc
27.4	JCS 'Plan Viability, Community Infrastructure Levy and Affordable Housing Study' (Feb 2016) ²⁰ http://www.gct-jcs.org/Documents/Examination-Document-Library-4/EXAM-176---JCS-CIL-and-Plan-Viability-Report-Final-January-2016.pdf
27.5	Pre-Submission JCS (June 2014) http://www.gct-jcs.org/Documents/PublicConsultation/Pre-Submission/JCS-Pre-Sub-FINAL-180614-v2.pdf
27.6	Gloucester City Plan Sites & Places Consultation Document (May 2013) http://www.gloucester.gov.uk/resident/Documents/Planning%20and%20Building%20Control/City-Plan-Strategy-Consultation-2013.pdf
27.7	JCS Exam 195C Gloucester City SALA table 2016 and maps http://www.gct-jcs.org/Documents/Examination-Document-Library-4/EXAM-195C---Gloucester-City-SALA-and-Maps.pdf
27.8	JCS Exam 213 Secretary of State Decision Perrybrook North Brockworth http://www.gct-jcs.org/Documents/Examination-Document-Library-5/EXAM-213---Secretary-of-State-Decision---Perrybrook-North-Brockworth.pdf
27.9	JCS Exam 216 WYG Note – Land at Winnycroft http://www.gct-jcs.org/Documents/Examination-Document-Library-5/EXAM-216---WYG-Note---Land-at-Winnycroft.pdf
27.10	JCS Exam 230 WYG Note – Winnycroft Lane Position Update http://www.gct-jcs.org/Documents/Examination-Document-Library-6/EXAM-230---WYG---Winnycroft-Lane-Position-Update.pdf
28	Turner Morum Viability Assessment
28.1	13.04.15 Turner Morum Viability Assessment - Application stage
28.2	22.10.15 Turner Morum Viability Assessment - Further negotiation LS stage
28.3	17.03.16 Turner Morum Viability Assessment - Further negotiation PBA stage
28.4	10.10.16 Turner Morum Viability Assessment - Appeal initial stage
28.5	21.10.16 Turner Morum Viability Assessment - Appeal revision 1 stage