
APPLICATION NO	05/00799/OUT	DC_SR
DATE REGISTERED	10th January 2006	
PROPOSAL	Outline planning permission for B1 industrial uses and the extension to the Arle Court Park and ride facility	
LOCATION	Land At North Road West/ Grovefield Way Cheltenham	
APPLICANT	Industrial Sales Ltd	
EXPIRY	11th April 2006	
RECOMMENDATION	Refuse	

CONSULTATIONS

Building Control	Building Regs required
Engineering Services	
CBC Car Parks	
Strategic Planning	Strategic planning and highways objection.
County Surveyor	
County Property Services English Nature	
Environment Agency	Object - application may present a significant flood risk from the generation of surface water run-off but is not accompanied by a FRA. 16.12.2005 The formal submission of this strategy would remove ENVA objection on flood risk grounds. Please re-consult if application re-registered, so Env Protection can be consulted..
Gloucestershire Wildlife Trust	
Central Networks	No objections but comment that there is a network within close proximity to the proposed development.
Local Plans & Development Control Unit Tewkesbury Borough Council Tree Preservation Order	
Cheltenham Civic Society (Trees) Cheltenham Tree Group	
Landscape Architect	
Urban Design Manager	The proposal is in outline with all matters except access reserved. However, the accompanying plan shows the layout and landscaping which this access arrangement is likely to inform, so this response

includes comments on the layout and strategic landscape treatment as well as more general comments.

The extension to the park and ride is logical and supported. However, in strategic urban structure terms, there must be questions about a large piecemeal employment development like this taking place irrespective of any other complementary development proposals (housing, community uses etc) which might help it be part of a sustainable framework for development of the town. In this regard, it is particularly unfortunate that it is being proposed adjacent to a major motorway junction - which is likely to impact on transport choices to and from the site.

Given the relatively isolate nature of the proposal, and its size, if it is approved, it is important that it includes uses complementary to the employment function, which may go some way to reducing movements from the site at lunchtimes and making it a pleasant working environment. So it ought to contain facilities for staff such as a crèche and restaurant/café. These might be provided individually in each unit, but there are more likely to be economies of scale and the ability to build some sense of community if facilities were provided to serve the whole development in dedicated buildings. Additionally, the site should provide some open space for recreation (passive or active) at lunchtimes - somewhere for employees to relax, walk. All these communal elements could be provided and managed through a management company.

The site is within the Green Belt, adjacent to the A40. There is some landscape screening along this boundary, part of an historic established copse. Latham's approach study for the A40 has identified the importance of the verdant character with occasional copses on this approach, some historically ass

South West Of England
Development Agency
Strategic Land Use
Team
Strategic Land Use
Team

Support the proposals.

Contrary to Council's response to Local Planning Inspectors report (Council 25.07.05). Proposal does not fully address strategic extension to Arle Court Park and Ride. Premature in advance of conclusions of Green Belt review.

Parish Council

Strong objections from Up Hatherley P.C. - land is in the Gloucester/Cheltenham Green Belt and all of the Strategic and Local Plans for the area rule out residential and industrial development. UHPC supports GOSW recommendation to review the Green Belt boundary especially in the south and north west of Cheltenham because such a review is likely to confirm that the Up Hatherley/Reddings Green Belt is in the most sensitive part of the whole C and G Green Belt complex, and it is imperative that development of the sort proposed here should be resisted until this review is carried out. It was suggested that this point should be made clear as it may discourage other speculative development proposals of this sort.

The Local Planning Authority should uphold their Green Belt policy and refuse this application.

Highways Agency (J
Ashman)
Highways Agency
(Colin Buchanan)
County Education

No comments - negligible impact on M5

County Archaeology	Recommend the applicant is requested to commission a field evaluation of the archaeological implications of the proposed development, the results of which should be made available prior to the determination of the application. 02/12/2005 Evaluation found no evidence for significant archaeology on this site.
Cheltenham Civic Society	We are concerned that this site may be part of the Green Belt and that its development may open the door for the release of adjoining areas of land. However, the proposal appears to be of a higher standard than many industrial developments and the lead taken by landscaping is to be encouraged. The bank of trees screening the site from the Golden Valley Bypass must be maintained, if the approach to Cheltenham is not to be severely damaged by this development.

Ward Councillors

REPRESENTATIONS

No. of Letters Received

REPORT

1. Description of Proposal

An outline application for B1 industrial uses on 6.4 hectares of land at North Road West/Grovefield Way.

Reserved for future consideration is the external appearance, siting, design and landscaping of the development. For consideration at this stage is the principle of the development and access (off Grovefield Way).

2. Site and its surroundings

The site is located to the west of Cheltenham, adjacent to the A40 (Golden Valley), 2km east of its junction with the M5 and 4.5km from the centre of Cheltenham by road.

The site is roughly 6.4 hectares in size and consists of four fields used for pasture. It slopes gently down to the north west, so that the lowest point is against the edge of the embankment with the A40. The site is broadly flat and divided into sections by hedgerows.

The site abuts the urban edge of Cheltenham and there are a variety of buildings and uses in the area. To the east of the site is the Borough Council Park and Ride. To the south-east of this is the residential area of the 'Reddings' which extends through to 'Hatherley'. There is housing and a community centre immediately adjacent on North Road West.

On the south-eastern side of Grovefield Way is the new B&Q Superstore, with Nuffield Hospital beyond and allocated employment land beyond that. There are notable developments at Arle Court beyond the Park and Ride roundabout with the KFC drive through recently being completed to finish the 'Travelodge' development.

There are no public footpaths across the site, listed buildings, conservation areas or other landscape designations covering or adjacent to the site. A watercourse crosses the site close to the boundary with the Park and Ride site.

The site is, however, located within the Green Belt which at this point, divides Cheltenham and Gloucester.

3. Relevant Planning Policy

Structure Plan, Second Review (1999)

- S.1 Bulk of New Development
- S.2 Development in Principal Settlements
- S.7 Environmental Quality of Development

- E.1 District Employment Land Provision
- E.2 Location of most Employment Development

- T.1 New Development and the Transport System
- T.2 Walking
- T.3 Cycling
- T.4 Public Transport
- T.5 Park and Ride
- T.8 Car parking Provision in New Development

- GB.1 Green Belt

- WM.4 Recovery – Recycling and Composting of waste

- TC.2 Development which Generates Many trips

- NHE.3 Agricultural Land

- F.1 Flooding and Flood Risk

- P.1 Pollution Control

Gloucestershire Local Transport Plan 2006 - 2011

Park and Ride strategy for Arle Court

Adopted Local Plan (1997)

- GP6 Changes of Use
- GE37 Green Areas, Open Space and Gardens
- GE41 Trees, Landscape features and Wildlife habitats

- BE34 Nationally Important Archaeological Remains
- BE35 Archaeological Investigations and Recording

- CO44 The setting of Cheltenham
- CO48 Definition of Green Belt
- CO49 Development in the Green Belt
- CO53 Agricultural Land

- EM66 Employment Uses
- EM70 Location of business Development
- EM71 Business Development

- UI117 Surface Water Run-off
- UI118 Land subject to Flooding

- TP126 Transport Provision in Development
- TP127 Access onto the Highway Network
- TP129 Standards for Infrastructure in Development

Emerging Local Plan Second Review Post Inquiry Minor Modifications Draft (2006)

CP1 Sustainable Development
CP2 Sequential Approach to Development
CP3 Sustainable Environment
CP5 Sustainable Transport
CP4 Safe and Sustainable Living
CP8 Provision of Necessary Infrastructure and Facilities

BE34 Nationally Important Archaeological Remains
BE34a Archaeological Remains of Local Importance

GE37 Private Green Space
GE40 Protection and Replacement of Trees
GE42 Accommodation and Protection of Natural Resources

CO44a Landscape Character
CO48 Definition of the Green Belt
CO49 Development in the Green Belt
CO53 Agricultural Land

EM66 Employment Uses

UI117 Development and Flooding
UI118 Development in Flood Zones
UI118a Sustainable Drainage Systems

TP127 Development and Highway Safety
TP129 Development and Highway Safety
TP130 Parking Provision in Development

Supplementary Planning Guidance

Submission of Planning Applications
Sustainable Development
Planning Obligations
Planning Obligations: Transport
Landscape in New Development
Flooding and Sustainable Drainage Systems

Government Guidance

Planning Policy Guidance 1: General Policy and Principles
Planning Policy Guidance 2: Green Belts
Planning Policy Guidance 4: Industrial Commercial Development and Small Firms
Planning Policy Statement 7: Sustainable Development In Rural Are
Planning Policy Guidance 13: Transport

Regional Planning Guidance 10: South West

Circular 02/99 Environmental Impact Assessment. Detailed guidance on the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999,

4. Commentary on relevant Planning History

04/01791/OUT an outline application for B1 industrial uses was due to determined at the December 2004 planning committee but was withdrawn prior to the star of the meeting,. The officer recommendation was to refuse.

5. Third Party Representations

To date we have received 110 letters of objection, including two petitions containing 68 signatures, objection from the ward Councillor Britter and up Hatherley Parish Council. The scheme has received a great deal of exposure in the Echo, with several articles appearing and correspondence in the letters page.

All of the letters have been copied to Members in the normal way. Common themes of objections are:

- loss of Green Belt land unacceptable
- Traffic implications, safety and congestion
- Industrial development wholly out of character with area
- Noise and light pollution
- Dangerous precedent
- Impact on wildlife
- Sequentially unacceptable. Development for industrial purposes should happen elsewhere in town (on Brownfield sites before Greenfield)

Gloucestershire County Council has submitted comments. The archaeological officer has reviewed the field evaluation survey undertaken on the applicants behalf and advised that no further archaeological investigation or recoding be required on the site. The Strategic Planning section has raised concerns about the incremental loss of Green Belt ahead of the comprehensive review coupled with objections to the size of the site to be allocated for expansion of the Park and Ride. This, we are advised, is too small and would not accord with the long terms aims of the County Council to create a 1000 space facility. Officers in the waste section of the County advise that the applicant has carried out appropriate consideration of waste minimisation on the application. It is suggested that conditions be attached to any consent to ensure the measures are carried through to reserved matters stage. The highway section has submitted a strong objection to the application and this is explained in further detail in the main body of the report. The Highways Agency advised that redevelopment of the site would have a negligible impact on the M5 motorway.

The South West Regional Development Agency has written in support of the application which they believe would "...help to deliver the Region's Economic Strategy (RES). The development can be seen to continue to help to develop the economic role of Cheltenham, as one of the Principal Urban Areas within the South West Region, by proposing an additional B1 employment development".

The Civic Society expressed concern that this site may be part of the Green Belt and that its development may open the door for the release of adjoining areas of land. However, they advised that the proposal appears to be of a higher standard than many industrial developments and the lead taken by landscaping is to be encouraged. The bank of trees screening the site from the Golden Valley Bypass must be maintained, if the approach to Cheltenham is not to be severely damaged by this development.

Central Networks raised no objections but commented that there is a network within close proximity to the proposed development.

6. Considerations

Main Issues

Green Belt

The key issue in this case is the fact that the proposed development is within the Green Belt, where certain types of development are considered acceptable in principle. PPG2 sets out a series of acceptable uses and forms of development, providing that they do not compromise the openness of the Green Belt.

The county Structure Plan and the borough Local Plan generally reflect the guidance laid out in PPG2 in terms of their own policies for Green Belt areas. The Structure Plans sets out that the Green Belt between Gloucester and Cheltenham and north of Cheltenham will be maintained.

The proposed change of use and redevelopment to form 6.4 hectares of B1 industrial space is not listed as an acceptable use within the Green Belt. It is therefore inappropriate development in principle and, in accordance with PPG2, should only be permitted in exceptional circumstances.

The application argues that the development of this site is essential to help address the employment land situation in Cheltenham. The background to this is that the Second Review to the Local Plan has failed to provide the requisite employment land for the period up to 2011 with a potential shortfall of 22.1 hectares. This is a similar line, if not identical, to the recent debate at the Local Plan Inquiry and full Council meetings in July last year and February this year. The site in question was promoted as an omission site that should be deleted from the Green Belt and redeveloped for B1 industrial uses.

Members will be well aware of what the Local Plan Inspector recommended in relation to this site. Some summary points to his considerations on this site are as follows:

'One of my main concerns is the very limited choice both of location and quality of sites or buildings, and I have no doubt that a proposal of this kind could widen that choice and offer a significant improvement in quality. Whatever other buildings or sites may be available in the Borough there is not, as the objectors argue, a site such as that proposed here'.

'I conclude on this issue, therefore, that this proposal could meet one of the shortcomings in the provision of employment land in the Borough's which I have identified in Chapter 12'.

'In this case, however, it seems to me that the effect of this proposal on the purposes of including this land in the Green Belt would be limited: there would be little effect on coalescence for a site of this size; as I discuss below the site has little countryside character limiting fears of encroachment; and a planned and controlled development could allay concerns about sprawl. In these circumstances, I have no doubt that any impact would be outweighed by the economic benefits of the development.

Notwithstanding this, the decision taken by full Council in February has set the policy context for the assessment for the application. Members were very clearly of the view that the site should not be allocated in accordance with the Inspectors recommendations, citing amongst other reasons, that allocation would be premature to the strategic review of the Green Belt.

The applicant argues that the Council has provided no reasoned justification why their employment land provision should not be provided as recommended by the Inspector or provided sufficient explanation of how the estimated employment growth can be accommodated through the strategy for rationalisation of existing sites. It is contended that the chosen employment strategy would lead to an acute shortage of employment land in the Borough over the Plan period, to the detriment of local businesses in the area. This strategy would also prevent the structured employment growth of local businesses established in the Borough and prevent the influx of new business.

This, it is argued, does not sit well with the town's designation as a Principal Urban Area which should be a central focus for growth on the County. This is a view shared, in part, by the South West Regional Development Agency, who support the provision of B1 industrial uses on the site and release from Green Belt designation.

By contributing to the provision of much needed employment land within the Borough, the applicant believes that there is a case for exceptional circumstances warranting departure from the Green Belt designation.

The employment land situation has been covered in several high profile applications recently debated by planning committee and was a key topic of discussion at the Local Plan Inquiry and full Council. There is no doubt that this is a complicated issue.

Policy E.1 of the Structure Plan requires provision to be made for a choice of employment sites to provide for flexibility and competition in meeting the social and economic needs of communities. However, the plan states that the employment land estimates for each district included in the policy should not be used with mathematical exactitude, nor as targets, as they represent an indicative distribution only.

The current position in respect of employment land provision in the Borough since 1991 is set out in the Local Plan. Whilst some additional employment land has been provided, a greater amount has been lost to redevelopment for other uses. Furthermore, planning permissions as yet unimplemented will further reduce the existing stock of employment land. Together the actual and potential changes and unimplemented schemes amount to an impending reduction of 10.1 hectares since 1991.

We have undertaken a comprehensive appraisal of opportunities for the allocation of additional land for employment, and this has identified only one site suitable for employment use within a mixed use development. There are no greenfield sites in the urban area that are considered appropriate for B2 (general industrial) use or B8 (warehousing).

Although the identified provision of employment land falls short of the Structure Plan's indicative estimate, the emerging Local Plan sets out that the circumstances which make the proposed level of provision appropriate in paragraph 12.13.

Notwithstanding the Inspectors comments, allocation of land at the site in question would require amendment to the Green Belt boundary. Policy GB1 of the Structure Plan seeks to maintain the Green Belt between Cheltenham and Gloucester to prevent coalescence. The review to the Local Plan sets out that the Council does not propose to review the Green Belt boundary over the plan period. As mentioned, to change the boundary of the Green Belt, 'exceptional circumstances' would have to be identified. We do not consider that exceptional circumstances exist to remove this land from such a designation. This approach accords with the advice given in PPG2 which also states that changes to the boundaries should not be made unless alterations to the Structure Plan have been approved.

The now abandoned County Structure Plan Third Alteration did not propose a review of the Green Belt up to 2016, as development can be accommodated in urban areas. The County Council has acknowledged, however, that a Green Belt review will be necessary as part of sub-regional work within the preparation of the Regional Spatial Strategy. This work is underway, partially funded through Planning Delivery Grant to assist it. The Government Office for the South West confirms that the most appropriate mechanism for reviewing the Green Belt is via the emerging Regional Spatial Strategy, and in particular its sub-regional work, currently in progress. It is through that process that the most sustainable options for meeting Cheltenham's need to accommodate growth will be determined.

In this specific context, our view is that the development is unacceptable in principle; that no special circumstances exist to warrant an approval against national and local planning policy; and release of land from the Green Belt at this stage would be premature to the strategic review of the Green Belt. In this respect, we place significant weight on the County Council's objection on this point. The application should fail because of this.

However, in order to try and narrow the margins of contention, we had asked the applicant to provide further information in order that we could assess questions about impact on the openness of the Green Belt and traffic/highway safety implications. Regrettably, the applicant has chosen not to submit this information which is somewhat disappointing. The following issues would therefore contribute to additional reasons for refusal.

Accessibility and Highway Safety

In relation to the site and highway grounds, the Inspector's report says:

'Clearly, the traffic generated by a development of this size will have an impact on roads and junctions. However, I heard nothing at the inquiry to persuade me that this would amount to an objection in principle to this proposal. Rather, I have no doubt that the impact could be dealt with at the development control stage by the application of policies in the Plan; the submission and consideration of a transport assessment; and the use of a travel plan'.

Officers have considered the submitted transport assessment. In short there is dispute about the capacity of the local highway network and measures required to mitigate the impact of the development in question.

We know the proposed development will generate a significant amount of traffic. The local network already exhibits a number of problems including congestion, primarily on the A40 corridor, and 'rat running' through residential parts of Hatherley. This can be clearly demonstrated. The increase in traffic from the development can only exacerbate these problems.

Although discussions have taken place with the developer about managing these impacts, they have taken the extraordinary decision not to formally revise the application. Regrettably, we are advised that it will not be amended and they request a decision on the application as submitted. We regard this as an error of judgement on their part since there is a solution to the problem which could be addressed at the application stage. Instead of a constructive dialogue, they appear to have chosen to argue this point at any appeal stage. This flies in the face of PPS1 which advises developers and local planning authorities to adopt a positive approach to discussions.

As a result the situation is that the application does not propose measures to address the safety and capacity issues on the network. The scheme is therefore not considered to be in the interest of highway safety or sustainability, in conflict with the development plan. The Council is presented with no choice but to add a refusal for refusal on this point.

In terms of accessibility, the peripheral location of the site and ease of access to the M5 and the A40 make this an attractive site to access by car. The Inspector comments on this point in his report but advises that the site is accessibility is no worse than other peripheral sites which are likely to be considered for the future long term growth of the town.

The key to this is the acceptability of a travel plan, which Members will be aware accompany most major planning applications. This current submission is no different.

Travel Plans provide a means of reducing the impact of travel to work and transport activity associated with work. They consist of a series of measures tailored to suit individual circumstances, locations and company requirements, and are designed to encourage sustainable travel and working practices. Green Travel Plans tackle a variety of aspects associated with work -related travel, including:

- Commuting;
- Business travel;

- Fleet management;
- Deliveries and other commercial traffic.

Although a Travel Plan inevitably results in some level of expenditure for the business involved, to cover staff time in developing and managing the plan, together with set-up and support costs, these costs need not be significant, and should be off-set by the following benefits:

Employees - benefit through greater flexibility in working practices, improved health, and potential cost savings generated through travelling by alternative means, or by sharing costs with others;

Employers - benefit through having a healthier, more motivated workforce, reduced levels of absenteeism, reduced parking requirements, and a better environmental corporate image;

The Community - benefits through reduced traffic, noise and pollution levels, and reduced conflict between vulnerable road users and motor vehicles.

At the time of writing, the engineering development manager was still assessing the Green Travel Plan. Even if it is determined that the plan is worthy of support, it would need to be secured by way of legal agreement. No discussions have taken place on such an agreement since the application is flawed in other respects. An update on these deliberations will be provided for committee.

Park and Ride

The Arle Court Park and Ride is situated to the east of the site and is extremely popular. Indeed the County Council has advised that it is the most successful in the County.

The current site has a capacity of 364 parking spaces but is situated on the largest single feeder of traffic into the town (paragraph 18.81 of the emerging Local Plan).

Recent work has been undertaken by the South West Regional Assembly (SWRA) on Transport Modelling for Cheltenham and Gloucester Joint Study Area has identified that in general, Park and Ride sites have been a success within this area. In the future it is anticipated that they can contribute further to the congestion relief in Cheltenham. Arle Court now operates close to capacity helping to reduce the number of cars entering Cheltenham daily by 1200 – 1500, alongside the other four sites around the town.

Within the Transport Modelling report it identifies that 67% of cars travelling to Cheltenham arrive from Stroud, the South and South West. The total number of passenger trips made on the Arle Court Park and Ride (by financial year 1 April – 31 March) has risen from 128,933 in 1998/1999 to 228,597 in 2003/2004. There was a 16% increase in passenger trips made in the last financial year. It is easy to demonstrate, therefore, the demand for increased parking facilities on this side of the town. It is already at capacity and evidence of this is congestion and overspill parking on site to non designated parking bays.

Planning consent has been granted to expand the number of spaces on site within the confines of the site to 534 spaces (application 05/00894/FUL permitted at the August 2005 committee meeting). Funding is already in place to implement this work.

There seems little dispute, however, that the Park and Ride will need to be further increased at some stage in the not too distant future and it is clear that the only direction for expansion would be to the west, into the application site. The point of contention is the degree of expansion and amount of land required.

The Inspector recommend that land be safeguarded on the site for a further 100 spaces to the Park and Ride. However, this figure directly flowed from the information placed before him. Not only was this information quite limited at the time of the Inquiry, but it has moved on considerably in the intervening period. The Inspector specifically mentions in his report that he heard no evidence at the Inquiry of greater need. We are now in a policy context where the Local Transport Plan 2006-2011 identifies expansion of the site to 1000 spaces.

The justification for this 'greater need' is as follows:

- the in bound traffic that might reasonably be expected to be intercepted by Arle Court (A40 Gloucester, A40, M5 and B4063) is currently measured at 26600. Projections from the SATURN transport model suggest that by 2016, this figure will increase to 39700. This projection is based on the housing allocation proposed in the Principal Urban Areas in Local and Structure Plans. Indications from the draft Regional Spatial Strategy are that the Council will be asked to accommodate RPG10 levels plus 8% by 2026. This will increase traffic flows significantly. It is assessed that by this time congestion will be at extreme levels without action.
- Projects are already underway that will provide an inbound bus lane between Benhall roundabout and Griffiths Avenue and an outbound bus gate at Shelbourne Road. Both projects will improve the journey times for buses, and more importantly reliability of the bus, thereby making it more attractive to use.
- Local Transport Plan 2 identifies the introduction of decriminalised parking as a priority and the County Council intends to work with district councils to introduce it within the next 24 months. This would allow the existing free car parking around the central area in Cheltenham town centre to be the subject of control and charging, which in turn would encourage use of Park and Ride.
- Notwithstanding the current emphasis on maintenance and road safety issues, the County's longer term strategy to address growing problems of congestion still includes passenger based transport based solutions. In particular, two proposed major schemes have regional support – the ring of 1000 space Park and Ride sites and the Integrated Transport at Elmbirdge Court. Both these projects will include high quality, high frequency services and bus priority measures, which will raise the profile of bus travel at the same time that an effective mix of travel options becomes essential.

In addition, other demand management measures may also have an impact. For example, the Government is committed to a national road pricing system within the next 15 years. The Borough Council also has its Civic Pride initiative that aims to remove cars from the town centre, whilst encouraging the use of Park and Ride.

Indications at this stage are that 4.5 acres of usable land in a reasonable configuration would be required. This is going to be significantly more than the 100 space allocation offered in the application and the subject of debate at the Inquiry. It follows that the application should be resisted since it does not provide the necessary space for the expansion of the Park and Ride required.

This matter is not straight forward, however, and complicated by certain events. Members need to be aware of the following points.

Guidance on the matter of safeguarding land for strategic transport initiatives such as Park and Ride is quite clear – that any safeguarding scheme would need to be set out in a policy contained within the Local Plan and cross references to a designation on the proposals map to the plan. We are nearing the end of a lengthy review process to the Local Plan and there has been ample opportunity to raise this through the various stages of evaluation. The County Council as highway authority and strategic planning authority did not request that such a safeguarding policy appear for this site. No such policy appears in the review to the Local Plan and this can only be described as unhelpful. Having said this, the County have raised objections to the submitted application on this specific point.

This presents a quite difficult situation and potential risk of costs at any appeal for unreasonable behaviour. Naturally, the issue has not been treated lightly and we have taken Counsels advice on the application and land allocation.

The outcome of careful considerations is that since the policy context has moved on since the Public Local Inquiry and it can be robustly demonstrated that additional land on the application site is required for strategic expansion of the Park and Ride, this should form a separate reason for refusal.

Other Issues

Archaeology

The County Council requested a statement of archaeological impact be submitted, including pre-determination trial excavations on site. This made the application invalid. The findings of the report were accepted in December, with officers at the County recommending no further action be taken on this matter.

Flooding

The application was also made invalid following objections from the Environment Agency that the submission lacked a flood risk assessment. A statement of flood impact was duly submitted, coupled with measures to address sustainable drainage on site. The Agency has confirmed that the measures identified by the applicant are appropriate and conditions would need to be attached to any consent to reflect this.

Environmental Impact Assessment

The main aim is to ensure that the authority giving the primary consent (the 'competent authority') for a particular project makes its decision in the knowledge of any likely significant effects on the environment. The regulations, therefore, set out a procedure that must be followed for certain types of project before they can be given 'development consent'. This procedure, known as Environmental Impact Assessment (EIA), is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This helps to ensure that the importance of the predicted effects, and the scope for reducing them, are properly understood by the public and the relevant competent authority before it makes its decision

It is clear that an EIA is not always required. An environmental statement will need to accompany a planning application where proposed development is of a type listed in Schedule 1 to the Town and Country Planning (Assessment of Environmental Effects) Regulations 1988, as amended, or is of a type listed in Schedule 2 and is likely to have significant effects on the environment. For any given proposal, the more environmentally sensitive the location, the more likely it is that environmental effects will be significant and that an environmental statement will be required.

The works at North Road West and Grovefield Way do not fall within Schedule 1. Annex A advises of the indicative thresholds and criteria for identification of Schedule 2 developments, and because of the size of the site redevelopment falls within 10 (a) of the Regulations. The proposals are therefore "Schedule 2 development" within the meaning of the legislation and the Council must screen every application for Schedule 2 development in order to determine whether or not an Environmental Impact Assessment (EIA) is required. This determination is referred to as a 'screening opinion'. In each case, the basic question to be asked is 'Would this particular development be likely to have significant effects on the environment?'

Officers have concluded that the scheme will not be EIA development and provide the development with a screening opinion to this effect. This should be recorded on any decision notice for the application.

7. Conclusion

For the arguments set out above, it is not considered appropriate at this stage to make ad hoc deletions from the Green Belt to provide land for employment. If it is shown that additional employment land is required, the Council considers this should be provided only after a comprehensive review of the Green Belt, as indicated in Regional Planning Guidance for the South West, now Regional Spatial Strategy, to create the most

sustainable solution. At this stage, any other approach to the situation would be prejudicial to the aims of the adopted Second Review to the Structure Plan.

In the absence of information convincing otherwise, a further reason for refusal should be the impact on the openness of the Green Belt and highway safety.

Redevelopment of the land as shown on the submitted drawings would also prejudice the strategic expansion of the Park and Ride.

The recommendation is to **refuse** this application for the reasons to be circulated under separate cover.

An update will be provided regarding deliberations on accessibility and the validity of the travel plan. It could form a further reason for refusal.