

**DOCUMENT 10**

**PLANNING STATEMENT**



## PLANNING STATEMENT

**SOUTH WEST BYPASS FINAL PHASE, GLOUCESTER | August 2018**

*On behalf of Gloucestershire County Council*

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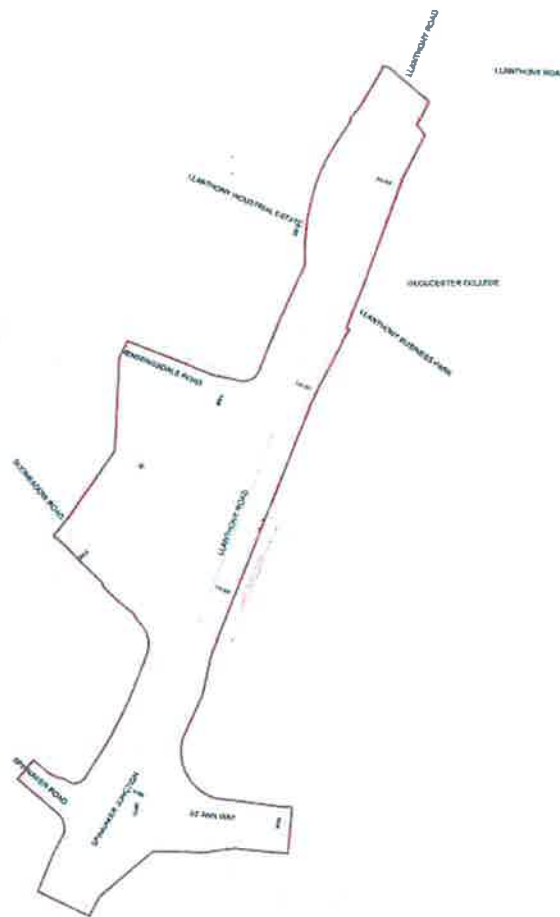
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## 1.0 Introduction

- 1.1 This Planning Statement is prepared by SF Planning Limited on behalf of Gloucestershire County Council. It should be read in conjunction with the submitted application and other supporting documentation.
- 1.2 Full planning permission is sought for the final phase of the Gloucester South West Bypass (GSWB), involving the widening of a stretch of the A430 from the Spinnaker Road junction to Llanthony Industrial Estate. To enable the highway works, the proposals also include demolition of the City Business Centre on land between Hemmingsdale Road and Sudmeadow Road.



Location Plan showing the site edged red

## 2.0 The Site and Development Proposal

### THE SITE

- 2.1 The application site is largely formed of existing highway boundary along the A430 between the Llanthony Road junction in the north and the A430/St Ann Way junction in the south.
- 2.2 The application site encompasses the main A430 carriageway and associated pavements, as well as parts of Spinnaker Road, Hempsted Lane (A430), St Ann Way, Sudmeadow Road, Hemmingsdale Road and the accesses to Llanthony Business Park and Llanthony Industrial Estate.
- 2.3 The majority of the land included within this application is highway land under the control of Gloucestershire County Council. However, third party land primarily along the western side of the A430, is also included as part of the application site to enable the proposed scheme. This includes land on the northern side of Hemmingsdale Road, the southern corner of the Sudmeadow Road/A430 junction and the entirety of the City Business Centre between Hemmingsdale Road and Sudmeadow Road.
- 2.4 The only buildings located within the application site are associated with the City Business Centre. This consists of a part single storey/part two storey commercial building. The building features a number of uses, primarily in the B-Class (B1, B2 & B8), with other retail (Class A1) and café (Class A3) uses.
- 2.5 The site is surrounded by residential development to the west along Sudmeadow Road and Hemmingsdale Road; industrial uses at Spinnaker Park in the south and Llanthony Business Park/Llanthony Industrial Estate in the north; Gloucestershire College to the north east; Llanthony Secunda Priory to the east and The High Orchard public house to the south east.
- 2.6 Although located outside the application site, it is important to note that Llanthony Secunda Priory is a Scheduled Ancient Monument with Grade I and Grade II Listed buildings, including the Grade I Listed wall and gatehouse immediately abutting the site to the east opposite the City Business Centre. Notwithstanding this, the site does not lie within a Conservation Area.
- 2.7 According to the Environment Agency maps, the site is located entirely within Flood Zone 2, but the majority of the site has a "Very Low" risk of Surface Water flooding.



Photograph looking north along the A430, showing the City Business Centre building



Photograph looking south along the A430, showing the City Business Centre building

## DEVELOPMENT PROPOSAL

- 2.8 The proposals subject of this full planning application for the final phase of the Gloucester South West Bypass (GSWB), involving the widening of a stretch of the A430 from the Spinnaker Road junction to Llanthony Industrial Estate. To enable the highway works, the proposals also include the demolition of the City Business Centre on land between Hemmingsdale Road and Sudmeadow Road.
- 2.9 The proposals represent the final phase of the GSWB and are required to reduce congestion at peak periods, improve journey time and support growth.
- 2.10 The Full Business Case (FBC), prepared by Gloucestershire County Council, submitted alongside this application, describes the scheme as follows:

*"involves widening on the A430 Llanthony Road from north of the Spinnaker Road Junction to Llanthony Industrial Estate. This option allows the two northbound lanes further north, from the two lane merge at the junction at Spinnaker Road to the existing two lanes merge north of the Llanthony Road Junction. It also extends the two southbound lanes further north to the junction with Hemmingsdale Road. The westbound approach from St Ann Way is widened to three lanes to accommodate two right turn lanes into Llanthony Road, and new traffic signals at Sudmeadow Road improve access to and from the side road. To optimise the signals, the staggered pedestrian crossing has been relocated from the south arm of Spinnaker Road signalised junction to the south arm of the newly signalised Sudmeadow Road."*

- 2.11 Additionally, the FBC also notes the following elements of the scheme:
- Inclusion of additional dedicated turning lanes to maximise traffic flows and improve accessibility for residents and businesses on side roads;
  - Increased width of footways to west side of scheme to allow combined footway/cycling facilities;
  - Creation of a pedestrian central reserve area at a new crossing point, to improve pedestrian facilities and safety, whilst also maximising traffic flows; and
  - Demolition of the City Business Centre required to enable the scheme.



- 2.12 The applicant undertook public consultation during Summer 2017, including the circulation of letters to all affected residents in the near vicinity of the site, as well as the key stakeholders. The consultation also included a couple of Public Share Events on 5<sup>th</sup> and 11<sup>th</sup> July 2017. The outcome of the public consultation was that there was overwhelming support in favour of the proposals.
  
- 2.13 A full analysis of the public consultation and responses is provided in the FBC at Sections 6.4 – 6.6 and this is also summarized in the Statement of Community Engagement, prepared by Amey Consulting.
  
- 2.14 Pre-Application discussions have also been held with Planning Officers at Gloucestershire County Council to determine the scope and detail to be supplied with the application. Furthermore, discussions are ongoing with Historic England and the Conservation Officers at Gloucester City Council in relation to the design of the footpath adjacent to the Grade I Listed Llanthony Priory Secunda, also a Scheduled Ancient Monument. It has been determined that a separate Scheduled Ancient Monument consent will be required and that this will be submitted alongside this planning application.
  
- 2.15 As the development is submitted by and will be carried out by Gloucestershire County Council, this application has been submitted to Gloucestershire County Council as the Local Planning Authority, under Regulation 3 of the Town & Country Planning General Regulations 1992 (SI No. 1492).

## GLOUCESTERSHIRE COUNTY COUNCIL SUPPORTING STATEMENT

- 2.16 The approval of this planning application is sought to enable the delivery of a highway improvement scheme to widen a critical section of the Gloucester South-West Bypass (A430 Llanthony Road). The project is considered high-priority by Gloucestershire County Council (GCC) and is a high impact traffic capacity improvement scheme for this arterial route connecting the north of Gloucester (A40/A417) to the south (A38).
  
- 2.17 A public consultation, undertaken in 2017 as part of a work on a business case for a highway scheme, has shown that this is an improvement scheme with a high public profile, and is supported by users and welcomed by local businesses.
  
- 2.18 It is intended that the scheme will be complete and open by the end of 2022.



- 2.19 The proposed scheme will significantly improve productivity by reducing travel time for the users of this corridor by between 5 and 10 minutes. Using the Department for Transport's web-based transport analysis guidance (WEBTAG) this equates to a present value benefit of £64,270,000 to the local economy over a 60-year appraisal period, with a Benefit Cost Ratio (BCR) of 12. The scheme is therefore considered to represent very high value for money.
- 2.20 The importance of capacity improvements along this corridor were identified in Gloucestershire's Strategic Economic Plan (SEP) in 2015. Detailed traffic modelling has been undertaken to optimise the design to ensure that the final scheme delivers best value for the public, local businesses, and all other partners and interested parties.
- 2.21 The scheme provides an opportunity for the enhanced redevelopment of a parcel of land along the route, which has the potential to act as a catalyst for other business improvements and developments along the Llanthony Road/A430 frontage. With approximately 25,000 vehicles a day using the GSWB, it is estimated that between 40,000 and 50,000 people would benefit from improvements to this section of road every day.
- 2.22 This scheme links directly to SEP priorities by providing strategic linkages between the M5 Growth Zone at Junction 12 and the A40. It will also provide wider regeneration benefits in both the immediate vicinity in Gloucester as well as further afield, including access to the Forest of Dean, A40, and Cheltenham.
- 2.23 It will directly benefit areas of significant importance to the local and regional economy, such as Gloucester Quays and Gloucester Docks. The scheme will also ensure that the area will continue to be attractive to private investors and can continue to fulfil a role as a top visitor attraction in Gloucestershire where some events (Gloucester Docks and Gloucester Quays) can attract in excess of 30,000 visitors a day. The improvements will also future proof the access route to accommodate for future development such as 'Bakers Quay' and 'Gloucester City AFC', which will increase demand on the corridor.

### 3.0 Planning Considerations

- 3.1 The relevant local planning policy background for the consideration of the application is provided in the adopted development plan and related supplementary planning policy.
- 3.2 Relevant national planning policy and guidance is provided in the National Planning Policy Framework (the Framework) and the National Planning Practice Guidance (PPG).
- 3.3 Section 70 (as amended) of the Town and Country Planning Act states that Local Planning Authorities should have regard to:
  - “(a) the provisions of the development plan, so far as material to the application;
  - (b) any local finance considerations, so far as material to the application; and
  - (c) any other material considerations.”
- 3.4 Paragraph 2 of the Framework reiterates this statutory requirement and confirms that the Framework is a material consideration in planning decisions.
- 3.5 Paragraph 48 of the Framework states that due weight should be given to relevant policies in existing Plans according to their degree of consistency with the Framework; the closer the policies in the Plan to the policies in the Framework, the greater the weight that may be given.
- 3.6 Paragraph 11 of the Framework is clear that, *“Plans and decisions should apply a presumption in favour of sustainable development.”* Paragraph 14 also states that for decision taking, the presumption in favour of sustainable development means approving development proposals that accord with an up-to-date development plan without delay.

#### ADOPTED DEVELOPMENT PLAN

- 3.7 The adopted development plan for the area consists of the Joint Core Strategy (2017) and the remaining Saved Policies of the Gloucester City Local Plan (1983).

- 3.8 The Gloucester Deposit Local Plan (2002) was adopted for development control purposes and although it does not form part of the statutory development plan, the policies within are a material consideration in the determination of planning applications.
- 3.9 The Local Plan 2002 Proposals Map acknowledges that the application site forms part of the safeguarded land for the South West Bypass (Policy TR.5). The rest of the South West Bypass and St Ann's Way Bridge Link have already been completed and the application site is the final phase of this strategic road improvement.
- 3.10 In the determination of this application the relevant saved Policies within the Gloucester City Local Plan (1983) are:
- Policy A2 (Particular regard will be given to the city's heritage in terms of archaeological remains, listed buildings and conservation areas)
- 3.11 The local policies that are a material consideration in the determination of this application within the Gloucester Deposit Local Plan (2002) are as follows:
- Policy ST.8 (Creating Attractive Routes to the Centre)
  - Policy TR.5 (South West Bypass)
  - Policy TR.6 (Developer Contributions South West Bypass)
  - Policy TR.31 (Road Safety)
  - Policy TR.32 (Protection of Cycle/Pedestrian Routes)
  - Policy TR.33 (Providing for Cyclists/Pedestrians)
  - Policy TR.34 (Cyclist Safety)
  - Policy TR.38 (Public Footpaths)
  - Policy E.4 (Protecting Employment Land)
- 3.12 At a more strategic level, the following policies within the recently adopted JCS are also material consideration in the determination of this application. A number have superseded policies in the aforementioned plans:
- Policy SD1 (Employment – except retail development)
  - Policy SD3 (Sustainable Design and Construction)
  - Policy SD4 (Design Requirements)
  - Policy SD8 (Historic Environment)
  - Policy SD9 (Biodiversity and Geodiversity)
  - Policy SD14 (Health and Environmental Quality)

- Policy INF1 (Transport Network)
- Policy INF2 (Flood Risk Management)
- Policy INF6 (Infrastructure Delivery)

## EMERGING DEVELOPMENT PLAN

### *Draft Gloucester City Plan 2016-2031*

- 3.13 The Draft Gloucester City Plan was released for public consultation in January & February 2017. It is expected that the Pre-Submission version of the Gloucester City Plan will be released for public consultation later in 2018, after which it will be submitted to the Secretary of State for examination. Once adopted, it will replace the policies all remaining policies within the 1983 & 2002 Local Plans.
- 3.14 Although the emerging Draft Gloucester City Plan is some way off adoption, important policies in the Draft City Plan document include:
- *Policy H1 (Sustainable Transport)* – The Council will work closely with Gloucestershire County Council and other organisations with regard to all local transport matters. The Council will take direction from both the transport strategy and policies of the JCS and the Gloucestershire Transport Plan (2015-2031) with regard to the priority projects for implementation, including the capital and revenue funded transport projects identified in the City. The policies set out in the JCS and the Gloucestershire Transport Plan will also be used with regard to development management matters and planning application decision making.
  - *Policy I1 (Infrastructure)* – Infrastructure provision in Gloucester will reflect the council's priorities for infrastructure set out in the JCS, LTP and the Infrastructure Delivery Plan. The council will focus on the delivery of infrastructure for the following:
    - New transport infrastructure projects contained within the Gloucestershire LTP
- 3.15 This application has been submitted in line with the principles of these emerging policies.

## PRINCIPLE OF DEVELOPMENT

- 3.16 The Gloucester South West Bypass (GSWB) was first allocated under Policy TR.5 of the Gloucester Deposit Local Plan (2002). Since this time the majority of the GSWB has been upgraded in line with this policy, although the application site is the only section along the entire route that has not benefitted from any improvements to date.
- 3.17 Due to the narrow nature of the road at this point, it has created a bottleneck and congestion and travel times are a significant issue. The issues have been exacerbated by the number of completed developments in the locality in recent years. The issues will continue to grow in severity, as a result of further planned developments through the JCS and the emerging Gloucester City Plan.
- 3.18 The latest Infrastructure Delivery Plan (IDP) was submitted as part of the evidence base for the JCS and is dated August 2014. Within this document the final phase of the GSWB is mentioned under Paragraph 4.9.8.4 (Gloucester Urban Areas), as a transport project that the new residential developments allocated through the JCS could contribute towards. The IDP followed the acknowledgement of the GSWB as a "Congestion Pinchpoint" within the Gloucestershire Strategic Economic Plan (SEP) prepared by GFirst LEP in March 2014.
- 3.19 Policy INF6 of the JCS acknowledges that the priority for the provision of infrastructure delivery will be assessed on a site-by-site basis and having regard to the mitigation of cumulative impact, together with the implementation of the JCS IDP.
- 3.20 The most recent Local Transport Plan (LTP) for Gloucestershire was adopted in Summer 2016 and was updated in November 2017 to take account of an update to the JCS evidence base. The current LTP covers the period between 2015-2031. Section 14 of the LTP outlines the transport delivery priorities within the plan period and separates them out into short-term (2015-2021) and long-term (2021 – 2031) delivery phases. The GSWB has been identified as a "*short term capital project delivery priorities (2015 – 2021)*" which means that it has been identified as one of the most important transport infrastructure projects within the plan period. As mentioned, completion is now due to take place in 2022.

- 3.21 In line with the priority nature of the project outlined in the IDP and LTP, Gloucestershire County Council applied for Growth Deal funding from GFirst LEP. In February 2017, they were able to secure £2m worth of funding through this mechanism, which is scheduled to be available during the financial year 2018/19. The total scheme will cost in the region of £7.3m, including the funding above.
- 3.22 The importance of delivering these important transportation priorities is not only identified at a strategic scale within the JCS, but is also at a local level within the emerging Gloucester City Plan at Policies H1 and I1.
- 3.23 The aforementioned Full Business Case (FBC) prepared by Gloucestershire County Council, provides an in-depth analysis of the strategic and economic need for the GSWB. It was this case that ultimately secured funding under the Growth Deal.
- 3.24 It is not the intention to reiterate all of the points made in the FBC, although it has been clearly demonstrated that the proposals subject of this application provide the following significant economic, social and environmental benefits:
- Reduction in congestion and waiting times by between 5-10 minutes at peak times on the GSWB corridor;
  - Reduction in economic disadvantages on the GSWB corridor and the provision of up to £65m to the local economy over a 60-year period (considered "Very High Value for Money");
  - Improve access between the west of Gloucester and the identified strategic employment growth site at Innsworth;
  - Improve access to skills, jobs, goods and services, including Gloucestershire College adjacent to the site;
  - Improvements in local air quality and regional air quality will be "slight beneficial";
  - Improvements to pedestrian permeability;
  - Improvements to the landscape and heritage setting of Llanthony Secunda Priory through the widening of the road and demolition of a large industrial building;
- 3.25 The need and the benefits of the GSWB have clearly been demonstrated and it has been a priority for Gloucestershire County Council over a number of years. The provision of the scheme would therefore clearly accord with the relevant development plan policies in this regard.



- 3.26 It is acknowledged within the FBC that in order to enable these priority improvement works, third party land will need to be acquired. Gloucestershire County Council have commenced communication with landowners of the necessary land, largely on the western side of the A430 as previously mentioned.
- 3.27 Included in this third party land is the City Business Centre, highlighted in the photograph below. The City Business Centre will need to be demolished to enable the development of the GSWB.



Aerial photograph showing location of City Business Centre (highlighted red) (Source – Google Maps)



- 3.28 As part of the overall consideration of this scheme, the applicant has instructed a structural engineer to review the impact of the proposed road widening on the structure of the building. Due to the nature of the building, this review outlined that 50% of the floor area of the City Business Centre would need to be demolished in order to make way for the road widening in any event. The remaining 50% of the building would not be structurally sound and would not result in a commercially viable building. Even if the remaining structure was sound, demolition in part would still require all of the existing businesses to vacate the building.
- 3.29 In addition to this, the existing building is utilitarian and unsightly in nature, particularly given its location directly opposite and in close proximity to the historic Llanthony Secunda Priory. Demolition of the building, as part of these proposals would further separate the built form from the boundary with the Priory and remove a building that clearly has a negative impact on the setting of the Scheduled Ancient Monument and Listed Building.
- 3.30 Following demolition of the City Business Centre, the site will be used in the interim to provide a safe and secure compound for construction accommodation and equipment associated with the GSWB construction.
- 3.31 The site area of the City Business Centre is approx. 6,000m<sup>2</sup>. The land required for the widening of GSWB would result in the permanent loss of approx. 1700m<sup>2</sup> (28%) of this employment land. 72% of the site will be available for employment uses following demolition of the building and completion of the road scheme.
- 3.32 There are clear benefits to support a new employment use here:
- Make better and full use of Previously Developed Land;
  - Removal of building detrimental to the setting of Llanthony Secunda Priory and replacement with a more appropriate built form further separated from the Listed Building; and
  - Reduction in site size enables a key transport priority for Gloucestershire.
- 3.33 Policy SD1 of the JCS, allows for the redevelopment of land already in employment use for new employment uses.

- 3.34 The benefits of the GSWB scheme to the local and wider community are clear and as a result it is considered that the demolition of the City Business Centre in its entirety is acceptable and in line with development plan policy. Both criteria of Policy E.4 would be met.
- 3.35 Overall therefore it is considered that the proposals are sustainable and suitable and should therefore be supported in principle.

## OTHER MATTERS

### Heritage/Archaeology

- 3.36 To support this application, the applicant has instructed Cotswold Archaeology to prepare a Heritage Desk-Based Assessment and have also prepared a Landscape and Townscape Appraisal that was initially submitted as part of the FBC. Heritage matters are an important consideration given the proximity of Llanthony Priory.
- 3.37 Scheduled Ancient Monument Consent is required alongside this application given that the application site is bordered by the Scheduled Ancient Monument of Llanthony Priory Secunda. The Llanthony Priory wall and gatehouse (List Entries 1271694 & 1271696) are also Grade I Listed. Following pre-application discussions with Historic England and the Conservation Officer at Gloucester City Council it has been determined that as the remodeled pedestrian footpath will immediately abut the wall and gatehouse, this has given rise to the need for Scheduled Ancient Monument Consent. As a result of this, Listed Building Consent would not be required in this instance.
- 3.38 It has been confirmed that Scheduled Ancient Monument Consent can be sought alongside the planning application and separate discussions on this will be ongoing.
- 3.39 It is not the intention to reiterate the findings in full as part of this Planning Statement, although it is important to note the following key points:

#### *Archaeology*

- There are no designated heritage assets within the Site or heritage assets of commensurate value to that of a designated asset.

- Equally, no designated heritage assets or heritage assets of commensurate value to that of a designated asset will be physically affected by the proposed development.
- There may be some potential for medieval and modern remains below the site, although the any medieval remains would be at a significant depth, greater than 1.8m. As a result, medieval deposit may not be impacted by the proposed development. Any post-medieval remains found on site at lower levels would be of low heritage value. Any modern industrial remains found are anticipated to be of negligible heritage value.

#### *City Business Centre*

- The City Business Centre is the standing remains of the former Stephen's Glevum Incubator Works, built in the early 20<sup>th</sup>-century.
- The remains are not considered to be of any evidential, historical or aesthetic value. The remains are not of any sufficient heritage value to require preservation in-situ.

#### *Setting of Llanthony Secunda Priory (Scheduled Ancient Monument & Listed Buildings)*

- The proposed development would not result in any harm to the significance of any designated heritage assets as a result of changes to their setting.
- Where the pedestrian footpath immediately abuts the Grade I Listed boundary wall and gatehouse, and consequently the Scheduled Ancient Monument, a scheme involving a brick course detailing running the length of the wall is in the process of being agreed with Historic England and the Conservation Officer at Gloucester City Council. A lime mortar infill to the gap between the brick course and the wall is also proposed to protect the wall.
- The reduction in traffic flow along the GSWB, increased pedestrian access to the heritage asset, widening of the carriageway and demolition of a negative building would have a beneficial impact on the significance and setting of the designated heritage assets.

- Any new building on the City Business Centre site could be designated to respect the significance and setting of the designated heritage assets.

3.40 Overall therefore, it is considered that the proposals would accord with the relevant policies of the development plan, the provisions of the Framework and the Planning (Listed Buildings and Conservation Areas) Act 1990.

#### **Transport Assessment & Highway Safety**

3.41 A full Transport Assessment has been prepared by Amey Consulting and has been submitted with this application and it is not the intention of this Planning Statement to reiterate the findings in detail.

3.42 Importantly, as this application is for a highway improvement scheme, it should be acknowledged that the proposals will not generate any new traffic for the network. The main conclusions in relation to traffic impact are as follows:

- The scheme has been designed to increase the capacity of the corridor, which is considered a key scheme for the County Council in terms of reducing the level of delay for all users of the network;
- Extensive traffic modelling has been undertaken to ensure that the scheme achieves the aims of the scheme;
- Traffic Rerouting - the scheme will result in additional capacity on the network, particularly southbound where congestion is significant at present particularly during the PM peak. Some local rerouting is anticipated, but no significant inducement of traffic in to the area. The City Centre route that is currently used by traffic avoiding the Bypass route is expected to benefit from reduced flows, and work is being undertaken separately to propose improvements to the centre of the city when the scheme is completed;
- The Economic Case for the preferred scheme produced a Benefit Cost Ratio (BCR) value of 12.0, which corresponds to "Very High Value for Money".

3.43 The proposals would therefore accord with the relevant policies of the development plan, the provisions of the Framework.

### **Ecology & Trees**

- 3.44 An extended Phase 1 Habitat Survey and a preliminary bat roost assessment has been carried out on the site and was initially submitted with the FBC.
- 3.45 Crucially, no bat roosts were found within the City Business Centre on site and although the building provided a low potential of being used as a roost, given its urban location, light emissions and uses it is unlikely to provide a suitable roost habitat.
- 3.46 Although the site is located adjacent to a number of habitats (including a pond) which would have potential for protected species within the grounds of Llanthony Secunda Priory, given that all work would be undertaken outside of the Priory boundary it is considered that there would be a negligible risk to ecology in this instance.
- 3.47 In terms of trees, a Tree Survey and Arboricultural Impact Assessment has been prepared by Amey Consulting and submitted with this application.
- 3.48 Although there will be some tree losses associated with this scheme, these losses are typically of trees of a lower quality (Category C) and the impact to visual amenity caused by such losses can be readily mitigated by additional tree planting.
- 3.49 There is sufficient room within the scheme extents to accommodate new tree planting to replace tree losses.
- 3.50 The proposals would therefore accord with the relevant policies of the development plan, the provisions of the Framework.

### **Flood Risk/Drainage**

- 3.51 A Surface Water Management Strategy Report has been prepared by Amey Consulting and is submitted to support this application.
- 3.52 As previously mentioned, it is acknowledged that the site is located within Flood Zone 2, but the majority of the site has a "Very Low" risk of Surface Water flooding. At present the surface water from the site is drained through a series of highway gullies and kerb drains in Llanthony Road. The water then gravitates towards a 450mm diameter surface water sewer on Hemmingdale Road before discharging into the River Severn.

- 3.53 Due to the nature of the scheme, the vast majority of the site is already hardstanding. As small amount of grassed areas will be removed and replaced with hardstanding highway/footpath as part of the scheme.
- 3.54 The proposals will provide attenuation storage at one location within the site and will ensure that the final outflow at Hemmingsdale Road would not exceed the pre-development flow rate for up to 100-year storm event plus 40% climate change. A further betterment solution for the highway drainage system on Llanthony Road will also be provided as per discussions with the Lead Local Flood Authority.
- 3.55 The solution proposed reduces the peak flow rates at Llanthony Road from 104.6 l/s to 54.4 l/s for a 100-year storm event plus 40% climate change. The peak flow rate at Hemmingsdale Road will also be improved from 309.7 l/s to 285 l/s. The proposals will therefore create an improvement to the current drainage regime in the area of the site.
- 3.56 The proposals would therefore accord with the relevant policies of the development plan, the provisions of the Framework.

#### **Neighbouring Amenity, Air Quality & Noise**

- 3.57 The nearest neighbouring dwellings are located in Sudmeadow Road and Hemmingsdale Road to the west of the City Business Centre.
- 3.58 Air Quality and Noise Assessments have also been prepared by Amey Consulting and have been submitted in support of this application. In terms of air quality, as a result of the overall highway works, the local and regional impacts would be considered to have a slight beneficial impact. In terms of noise, the report concluded that the road improvement scheme would give rise to negligible adverse noise impacts for adjacent noise sensitive receptors.
- 3.59 The reduction in congestion and waiting times will have a positive impact on air quality and noise and as a result neighbouring amenity in the locality will be improved from the current situation.
- 3.60 The proposals would therefore accord with the relevant policies of the development plan, the provisions of the Framework.

## 4.0 Conclusion

- 4.1 This Planning Statement, in conjunction with the other statements that have been submitted in support of this application, demonstrates that the proposed development is in accordance with the policy objectives of the Framework, the policies of the Development Plan and the emerging Development Plan policy situation.
- 4.2 The economic, social and environment case for the final phase of the GSWB, involving the widening of the A430 and the demolition of the City Business Centre, has been made in full. There has been support for the scheme for a number of years through planning policy, the IDP, the LTP and the SEP. It has now been fully costed and the funding is in place to implement the scheme. The proposals provide a significant community and highway benefit.
- 4.3 The demolition and removal of the City Business Centre in its entirety is necessary to implement this scheme. However, only 28% of the land area of the City Business Centre is permanently required of the GSWB, leaving 72% of the land area available for employment uses following completion of the scheme.
- 4.4 The proposals have been considered against the surrounding constraints, including the historic Llanthony Secunda Priory and it has been found to represent a benefit of the existing situation.
- 4.5 The proposal has been demonstrated to accord with relevant planning policy considerations and there are no material considerations that would suggest otherwise. It is therefore respectfully requested that planning permission is granted. We would urge the Council to adopt the proactive and positive approach to planning that the Framework advocates and to grant consent for the development in light of the case made herein.





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