

Cheltenham Local Plan (2011-2031) Examination

Matter 3 Hearing Statement Housing and Mixed Use Development

Land north of Church Road, Leckhampton

Prepared by Black Box Planning (495, 1327)
on behalf of Redrow Homes



Matter 3: Housing and Mixed Use Development

Main Issue: Do the proposals for residential and mixed use development in the CP Policies H1 and H2 deliver the requirements for residential development in the JCS set out in Policy SP2 and Table SP2a?

- 2.1. No, the proposed allocations in the CP do not deliver the requirements for residential development in the JCS. Insufficient levels of housing and employment are allocated to achieve the requirements of the JCS. The CP has not been positively prepared in seeking to meet the objectively assessed needs of Cheltenham Borough.
- 2.2. Can the Borough Council provide an update on windfall completions since the adoption of the JCS, in relation to the 784 windfall allowance in the calculation for Cheltenham supply in SP2a? If windfall completions are not coming forward at an appropriate rate to realistically achieve the 784 dwellings identified in the SP2a, then the CP should identify additional allocations to make this up.

1. Table SP2a identified a supply of 1,011 dwellings to be identified through the Cheltenham Plan. Does the CP identify sufficient land to meet this requirement?

- 2.3. No, the proposed allocation in the CP identified under Policies H1 and H2 amount to 730 dwellings, therefore falling a significant way short of the **minimum** requirement set by the JCS. Overall, the CP is not positively prepared as insufficient allocations have been identified.

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2. Does the allocation of any sites under Policy H1 or H2 affect the soundness of the CP?

- 2.4. No, the allocations are broadly sound. Whilst some may be aspirational with regard to their full delivery within the plan period, this can be redressed modifications to the CP to increase the total number of allocations to ensure the plan is effective and positively prepared.

3. To what extent has the trajectory in Table 8 of the CP been agreed with the relevant landowners, developers and agents? Are the sites identified in Policies H1 and H2 likely to deliver 1,011 dwellings by 2031 in accordance with the requirements of the NPPF para 47?

- 2.5. It is almost certain that the sites identified in policies H1 and H2 will not deliver 1,011 dwellings by 2031, and therefore the CP fails paragraph 47 of NPPF (March 2012). The JCS set a housing target for Cheltenham of **'at least'** 10,996 dwellings, therefore presenting the minimum requirement. There is no boost in the CP, rather it is planning for the minimum requirement, and even then, it falls short of realistically delivering the quantum of homes suggested. The CP allocations only amount to 730 dwellings against the 1,011 dwellings being planned for. Furthermore, the delays associated with the delivery of challenging brownfield sites is well documented both nationwide and more locally, and therefore the CP's reliance of some brownfield sites to deliver in full during the plan period is unrealistic.

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2.6. The Council will also be familiar that the JCS trajectory for strategic sites is already somewhat behind and whilst the JCS review is underway and will no doubt seek to redress any delivery shortfall, in the short term, the CP provides an opportunity to ensure that sufficient allocations are made to boost housing delivery, and therefore helping to ensure development decisions in the Borough are plan led.

2.7. In order to make the plan sound in this regard, Redrow Homes propose that modifications are required to identify additional local plan allocations in order to have any confidence that the plan will deliver 1,011 dwellings in the plan period.

4. Has sufficient regard been given to the impact of development on historic assets and their settings at the following housing allocations: HD2, HD3, HD4, HD7, HD8?

2.8. N/A to Redrow Homes.

5. Would it be appropriate to allocate additional housing sites in the CP in order to provide more choice and help ensure that the target figure of 1,011 dwellings is met?

2.9. Yes. In order for the CP to be sound it is clear that additional allocations are made in order to have any confidence that the target figure of 1,011 dwellings will be met during the plan period.

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6. Is there adequate justification for the siting of a school within the Leckhampton allocation (MD5)?

- 2.10. N/A to Redrow Homes, but the principal of a new secondary school on Leckhampton Fields generally, which respond to local need in Cheltenham is supported.