

Written Statement

CHELTENHAM BOROUGH COUNCIL LOCAL PLAN 2011 – 2031 EXAMINATION

REPRESENTOR ID: 436

COMMENT NUMBER: 1165 & 1166

1.0 INTRODUCTION

- 1.1 This written statement has been prepared by Walsingham Planning Ltd (WP) on behalf of Bovis Homes Limited (Bovis Homes) in relation to the examination of the legal compliance and soundness of the Cheltenham Plan 2011-2031 (CP).
- 1.2 WP are representing Bovis Homes at the hearing sessions on Matter 3: *Housing and mixed-use development* and Matter 4: *Green Belt and Green Infrastructure*. This written statement responds to the relevant Inspectors Issues and Questions (revised), received on 14 January 2018.
- 1.3 In accordance with the Examination Guidance Note this written statement is limited to the issues and questions relevant to our original representations, it relates only to new matters that have arisen since those representations and does not repeat what is in the previous representations. It should therefore be read in conjunction with our original representations.

2.0 MATTER 3: HOUSING AND MIXED USE DEVELOPMENT

Question 5

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

- 2.1 The allocations in the CP are intended to complement the strategic allocations made through the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) to ensure that the objectively assessed housing need is met.
- 2.2 In our original representations we set out Bovis Homes major concern that there is insufficient flexibility in the CP to ensure an adequate level of housing supply and that

Written Statement

this was especially pertinent given the reliance on large strategic allocations with significant infrastructure requirements alongside land assembly issues.

- 2.3 At the time of our original representations Cheltenham Borough Council 2017 Annual Monitoring Report, claimed to demonstrate a five-year housing land supply. However, the Council subsequently issued a Five Year Housing Land Supply Position Statement August 2018 (Position Statement), as one of the submission documents, that sets out a housing supply of just 4.6 years. This is primarily attributed, by the Council, to the delivery of strategic allocations being slower than first anticipated when the JCS was adopted. In Bovis Homes view this proves that their concerns were well founded.
- 2.4 In their Letter of Support for Examination September 2018 the JCS Authorities state that as the delivery delays for Cheltenham relate directly to the strategic allocations it is therefore an issue to be dealt with through the JCS review as opposed to the local plan.
- 2.5 Whilst Bovis Homes consider that the JCS review must address the shortfall and delivery issues related to strategic allocations, it is nonetheless appropriate for the CP to identify additional housing capacity to provide greater flexibility in light of the delivery issues related to strategic allocations. This could be done by identifying additional housing sites and/or extending existing allocations to ensure that all suitable development land is included.
- 2.6 Bovis Homes consider that timing is also a relevant consideration. The indicative timeline for the JCS review anticipates adoption in winter 2021. Waiting this long to resolve these issues may result in further undersupply that will exacerbate the problem. Identifying additional capacity through the CP offers a more immediate way of easing the problem.

3.0 MATTER 4: GREEN BELT AND GREEN INFRASTRUCTURE

Question 1

“Policy INF3 of the JCS deals with Green Infrastructure and seeks to deliver a “series of multifunctional, linked green corridors across the JCS area”. Does the approach adopted in the CP through Policies GI1, GI2 and GI3 deliver that requirement in a

Written Statement

manner consistent with national policy as set out in the NPPF paragraphs 76 and 77 and accompanying guidance in Planning Practice Guidance (PPG)?”

- 3.1 As set out in our original representations, Bovis Homes considers that Policy GI1 is not consistent with national policy as set out in the NPPF paragraphs 76 and 77. The reasoning for this is set out in detail within our original representations and supported by Opinion from Counsel.

Question 3

“To what extent does the Council’s Local Green Spaces Study Report parts 1 and 2 provide the justification for the designation of the sites listed in Table 8 of the CP as LGS in accordance with National policy and advice?”

- 3.2 As set out in our original representations, Bovis Homes does not consider that the above-mentioned report provides sufficient justification in accordance National policy and advice. Again, the reasoning for this is set out in detail within our original representations.

Question 5

“Table 8 of the CP proposes significant areas of LGS to be identified at Leckhampton Fields, the North West Cheltenham Strategic Allocation at Swindon Village, and at the West Cheltenham Strategic Allocation. Is there any evidence that areas of 39.91, 24.5 or 18.25 ha could be considered not to be “an extensive tract of land”?”

- 3.3 As set out in our original representations Counsel’s advice is clear that, while there are no hard and fast rules or thresholds in relation to an acceptable maximum size for LGS, compelling and cogent reasons are required to allocate large areas of LGS exceeding 2 hectares, and in such circumstances decision takers have consistently regarded such areas as being “an extensive tract of land”. We are not aware of any evidence or recent decisions that would indicate otherwise.

Question 7

“For Leckhampton Fields, guidance was provided by the JCS Inspector in her report. She stated it would be for the CP to identify the detailed boundaries of the LGS. Can

Written Statement

the scale and extent of the proposed LGS be fully justified in accordance with the JCS, and National policy and guidance?"

- 3.4 Again, as set out in our original representations, Bovis Homes consider that the scale and extent of the proposed LGS at Leckhampton Fields cannot be justified in accordance with the JCS and National policy and guidance. The Opinion from Counsel attached to our original representations, considered the guidance provided by the JCS Inspector and the discussions that followed. Counsels advices was clear that there is no justification whatsoever within the Inspector's preliminary findings, or the JCS itself, for LGS of the size proposed at Leckhampton to be designated.