



# The Reddings Residents Association

c/o Fayrecroft North Road East The Reddings Cheltenham Gloucestershire GL51 6RE

## **Response to Cheltenham Local Plan communication of 21st December 2018**

### **ID no: 494 – The Reddings Residents’ Association**

We would like to comment as follows on the Inspector’s Questions please.

#### **Introduction**

In respect of site E3 in the Local Plan, we attach copies of the closing arguments from the Appellant developer and the LPA in respect of an Appeal heard by Inspector Paul Jackson from 8 January to 15 January 2019. The Inspector’s report is due for publication on, or before 1 March 2019.

The Appeal concerns the inclusion of A1 and A3 class retail and D class childcare/education on this sensitive employment site which has extant permission for B class use. The site was in the greenbelt but was taken out by the JCS Inspector, because the BMW building was in progress at the time.

The site is listed in table 11 of the Local Plan (LP) as being for hybrid use, although there is no permission for this and we objected on that point.

The Barrister for the Appellant was very critical of the LP and its policies on a number of points, including the unusual decision by the Council to have:

*(Para. 3.4.2) “made no amendments whatsoever to the submission version. Indeed, there is no evidence that the Council considered any objections raised against the emerging plan. Thus, all objections to the emerging plan remain unresolved and, so far as the evidence suggests, they have not been considered”.*

Within the appeal, many points that the Inspector makes in her questions on the various matters are parried between the barristers. In doing so, they raise significant points in relation to site E3, but generally in relation to: Policies SD1, EM2, SD4, CP7, the emerging local plan, paragraph 22 and 118 of the NPPF, EM3, the JCS, employment land supply, the tilted balance, and points of law, amongst others, upon which the Inspector has raised questions.

Copies of both closing submissions are included for balance, but serve to illustrate the non-robust nature of the drafting of the LP. This is of great concern to ourselves and many other respondents that the Council seem to have ignored following the consultations.

In respect of site E3, there is no existing retail policy which is relevant to The Reddings, yet much retail has been built since 1998.

The site was in the very thin greenbelt strip separating Cheltenham from Churchdown (which has now broadly been merged with Gloucester by the JCS) and the Tewkesbury BC boundary. The JCS process has allowed the developer to remove it from the green belt and introduce retail. If either of the Appeals are allowed, there will be a retail frontage along Grovefield Way.

The LP proposes significant extensions to the PUA’s along the remaining greenbelt strip adjoining Grovefield Way. If these Appeals are permitted, the Council indicates that the new green belt sites will be available for employment and/or housing. The risk of “retail contagion and uncontrolled sprawl” across the remainder of site E3 and along Grovefield exacerbated by the absence of any retail plan in the area is significant and will be facilitated by the proposed and sometimes unconnected policies proposed within the draft local plan.



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The issues on site E3 variously concern the local plan green belt, housing supply, economic policy, vision statements, health and environmental quality and transport policies of the LP in combination and can be seen as a microcosm for the borough. The policies in the LP must therefore be robust in order to realise the visions.

## **Matter 4. Green Belt and Green Infrastructure**

2. A review history of site E3 shows that this policy is not justified.
3. See above – no. None of the Local Plan is clearly worded as we set out in our earlier submission.

### **Main issue**

1. In The Reddings the green corridors are under threat, and the LP promotes the risk to the existing green spaces and greenbelt.

In our consultation submission, we raise concern about the proposed extensions to the PUA along Grovefield Way, which will extend into the last remaining very narrow strip of local Green Belt which separates Cheltenham from Tewkesbury and Gloucester. CBC dismiss our concerns very lightly in their summary report. The resulting development in the PUA's would cause the length of the Grovefield Way to be "built out", leaving only a small ribbon of undeveloped Green Belt behind it. The Green Belt will be significantly harmed. Pressure to develop the remaining narrow ribbon is foreseeable and the wording of the policies in the local plan and JCS, and the precedents set by taking site E3 out of the Green Belt, may not be sufficient to resist it. The PUA's will therefore lead to "Urban Sprawl", contrary to the aspirations of the local and JCS policies.

The stated aim of the PUA extensions is to "advise" developers that the area within the PUA is available for development, even though SALA has already assessed the sites as unsustainable. Already, developers are seeking to construct 90 homes on land earmarked for the PUA extension and on Green Belt land that is not included. The current JCS review will no doubt lead to developers re-submitting their proposals following the "call for sites".

With reference to the attached Arup report (Phase 2 JCS traffic evidence) – (see our comments on matter 8) each of the PUA sites will need an entrance onto Grovefield Way for access and egress. The traffic will have exactly the same difficulties joining the traffic on Grovefield Way that Arup identify for junction 14, North Road West (even more so if the appeal to permit retail on the B1 Grovefield site is approved in January 2019, as retail traffic is not modelled by Arup). If traffic lights, or roundabouts, become the solution, the South-West Distributor road will simply become an estate road and the distributor road function will be lost. Pollution (both fume and noise) will also rise significantly, possibly beyond government guidelines as a consequence of the sprawl.

As such we believe that approving the PUA extensions in The Reddings (Chestnut Farm, The Hayloft & along North Road West and The Reddings), will cause significant harm to The Reddings area as a whole (contrary to SD14 and various other policies set out in the JCS and draft local plan, as we rehearse in our previous submission) and should not be permitted.