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**CHELTENHAM BOROUGH PLAN
2011 – 2031
EXAMINATION STATEMENT ON
MATTER 3
NEWLAND HOMES
(REPRESENTOR NUMBER 448
COMMENT 1280,1283)
21 January 2019**

CHELTENHAM BOROUGH PLAN 2011 – 2031 EXAMINATION

STATEMENT ON MATTER 3
21 January 2019

Prepared for

Newland Homes
Representor number 448
Comment Numbers 1280, 1283

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1. INTRODUCTION

Newland Homes Limited (Newland), controls land within Cheltenham Borough at The Reddings/Grovefield Way. Newland has submitted duly made representations on previous versions of the Cheltenham Plan, including the Regulation 19 submissions made in April 2018.

This statement sets out responses to the Inspector's questions for Matter 3: Housing and Mixed-Use Development, insofar as they relate to Newland's previous comments, conform with the Inspector's Guidance note (ED007) and/or have arisen since the Regulation 19 submissions of April 2018.

2. MAIN ISSUE: DO THE PROPOSALS FOR RESIDENTIAL AND MIXED USE DEVELOPMENT IN CP POLICIES H1 AND H2 DELIVER THE REQUIREMENTS FOR RESIDENTIAL DEVELOPMENT IN THE JCS SET OUT IN POLICY SP2 AND TABLE SP2A?

- 2.1. *Q. 1 Table SP2a identifies a supply of 1,011 dwellings to be identified through the Cheltenham Plan. Does the CP identify sufficient land to meet this requirement?*
- 2.2. Newland notes that Policy SP2 sets a requirement for '...at least 10,996 new homes' to meet the needs of Cheltenham Borough and that Table SP2A identifies 1,011 dwellings from the Cheltenham Borough Plan as Further Potential.
- 2.3. Comparing JCS Table SP2a with Table 2 in the CP, there are common elements such as windfalls at 784, completions at 1,724, contribution from strategic allocations at 5,385. The remaining elements however, are described and have alternative values.
- 2.4. JCS table SP2a identifies commitments at 2,178, existing Local Plan allocations at 10 and CP contribution of 1,011.
- 2.5. CP Table 2 identifies planning permissions of 1,524 and urban capacity permissions of 446 totalling 1,960 dwellings within the CP area. The allocations at H1 and H2 total just 790 dwellings, as designated rather than the 1,011 dwellings set out in JCS table SP2a. A further contribution of 377 dwellings from a planning permission in Tewkesbury brings the supply total to 10,917 which is below the JCS Policy SP2 dwelling requirement of '...at least 10,996 new homes'.
- 2.6. It is clear that neither the 1,011 contribution nor the JCS dwelling requirement is met by the CP.
- 2.7. *Q. 2 Does the allocation of any of the sites under Policy H1 or H2 affect the soundness of the CP?*
- 2.8. As set out in their regulation 19 representations, Newland believes that there are capacity issues with a number of the allocated sites and that they are not supported by an appropriate evidence base (see below for further details).
- 2.9. In that regard Newland questions the soundness of those allocations.
- 2.10. *Q. 3 To what extent has the trajectory at Table 10 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?*
- 2.11. Newland notes that there is no evidence to support the delivery trajectory in Table 10.

- 2.12. In addition, and as set out in their regulation 19 representations, Newland believes that there are delivery and capacity issues with several the allocated sites. The following provides an update on those sites:
- a. Christ College Site B (HD1) - No further information has been submitted and original concerns remain.
 - b. Land at Stone Crescent (HD5) - 17/02460/FUL –was refused 22nd June 2018. 18/01661/FUL – erection of 18 dwellings with associated road and sewers – withdrawn. 18/02215/FUL – construction of 13 dwellings and ancillary works – permitted 21st December 2018 subject to S106 Obligations to secure affordable housing and education contributions. Therefore, capacity is 13 dwellings rather than 20.
 - c. Priors Farm Fields (HD7) - 17/01547/DISCON – discharge of condition 6 (tree and hedge protection plan) and 8 (ecological appraisal) for flood alleviation scheme. Original capacity concerns remain.
 - d. No progress on North Place/Portland Street (MD2).
- 2.13. On the basis of the update above Newland considers that their original concerns regarding capacity are valid in that the allocations are not supported by sufficient evidence to be sound and is concerned that the figure of 1,011 is not achievable without additional sites being allocated.
- 2.14. *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?*
- 2.15. As set out at ED010c and ED010d it is still unclear as to the impact on the heritage assets and their settings from the proposed allocations. Newland notes Historic England’s objection to the planning application for Oakhurst Rise (HD4-25 dwellings) which adds to the deliverability concerns raised by Newland above.
- 2.16. *Would it be appropriate to allocate additional housings sites in the CP in order to provide more choice and help to ensure that the target figure of 1,011 dwellings is met? (NB: this does not seek the identification of sites currently omitted from the CP)*
- 2.17. For the reasons set out above and contained in their Regulation 19 submissions, Newland is convinced that the allocation of further sites is essential to the soundness of the plan’s requirement to deliver 1,011 dwellings.
- 2.18. *Is there adequate justification for the siting of a school within the Leckhampton allocation (MD5)?*
Newland has no comment to make on this question.



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