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**CHELTENHAM BOROUGH PLAN
2011 – 2031
EXAMINATION STATEMENT ON
MATTER 4
NEWLAND HOMES
(REPRESENTOR NUMBER 448)
21 January 2019**

CHELTENHAM BOROUGH PLAN 2011 – 2031 EXAMINATION

STATEMENT ON MATTER 4
21 January 2019

Prepared for

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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, from September 2013 including the Regulation 19 submissions made in April 2018.

This statement sets out responses to the Inspector's questions for Matter 4: Green Infrastructure insofar as they conform with the Inspector's Guidance note (ED007) and/or have arisen since the Regulation 19 submissions of April 2018.

2. MAIN ISSUE: GREEN BELT

- 2.1. *Q. 1 Does the CP accord with Policy SD5 of the JCS in relation to the Green Belt?*
- 2.2. Newland notes that Policy SD5 of the JCS sets out the strategic context for protection of the Green belt at clause 1, in line with the NPPF. Clause 2 refers to the boundaries of the reviewed Green Belt and identifies that Borough Plans provide the opportunity for a limited review of the Green Belt, where justified by exceptional circumstances, which is also in line with the NPPF.
- 2.3. The clauses 3-6 of Policy SD5 relate to developed sites in the Green Belt including Cheltenham Racecourse which falls within Cheltenham and Tewkesbury Boroughs. No detailed policy is provided to deal with the element of Cheltenham Racecourse that falls within Cheltenham Borough.
- 2.4. Clause 7 deals with the Safeguarded areas.
- 2.5. Paragraph 6.3 of the CP introduces Policy GB1 which deals with residential infilling in the Green Belt. The first sentence of paragraph 6.3 states that '*Protecting the Green belt from harmful development is crucial as part of a coordinated and balanced approach to securing economic prosperity and good standards of health and well-being for the Borough in the future.*' However, there is no evidence to support this claim and evidence from previous planning decisions such as at Grovefield Way (See **Appendix A**) shows that the Green Belt reduces economic prosperity.
- 2.6. As set out below Newland is concerned that lack of employment and housing land is reason for a limited Green Belt review through the CP. The limited infilling element of GB1 provides very limited opportunities and only for residential development.
- 2.7. Policy GB2 deals solely with replacement or rebuilding of existing dwellings. This issue is not addressed by JCS Policy SD5 and is dealt with by the NPPF at paragraph 89, though it is noted that the NPPF is less restrictive with regard to the use of the building to be replaced.
- 2.8. The approach of Policy GB1 and GB2 in the CP are not considered to be in conformity with JCS policy SD5.
- 2.9. *Q. 2 Are there any exceptional circumstances which would justify a limited review of Green Belt boundaries through the CP?*
- 2.10. Through statements made by Newland and others in relation to Matters 2 and 3 it is clear that the CP is unable to deliver the requirements of the JCS without the identification of additional housing sites and employment sites.

- 2.11. These exceptional circumstances were sufficient to justify the strategic review of the Green Belt including removal of land from it, through the JCS. Newland believes that the exceptional circumstances remain valid for the CP and a Green Belt review should be part of the CP.
- 2.12. *Q. 3 Are policies GB1 and GB2 clearly worded and in accordance with national policy in paragraphs 79-92 of the NPPF?*
- 2.13. Paragraph 81 of the NPPF places a responsibility on LPA's to 'plan positively to enhance the beneficial use of the Green Belt' and then sets several examples. Newland notes that neither GB1 nor GB2 address this issue.
- 2.14. As set out above GB2 is more restrictive than national policy at paragraph 89 bullet 4 in that it provides no opportunity for the rebuilding of other uses than residential.



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