

## **Matters 4 – Supplementary Statement for discussion - 26 February 2019**

Since the late 1980's, there has been much development in the once "semi-rural" area of The Reddings. This is located in the south west of the area and includes employment sites E2 and E3.

The area was an integral part of the "important" greenbelt setting of the town referred to in paragraph 7.5 of the draft Cheltenham plan.

In 1992 the South West Distributor Road (Grovefield Way) cut The Reddings in half. Much greenbelt was sacrificed to the east "urban" side of the new distributor road and a "defensible" boundary was established along the western side of Grovefield Way. This left a number of residential houses and farms within the greenbelt and outside of the urban area to the west of the distributor road.

Since the road was constructed, there has been much "off plan" development in the "urban side". This has included a Harvester, Travelodge, KFC, B&Q, Home Bargains, Pets at Home, Nuffield Hospital, Asda superstore, a new care home and approximately 400 new houses, all without any improvements to infrastructure, or any spending of the £2million Section 106 money in the area.

In 2007, following an appeal, permission to construct B1 offices on site E3 was granted within the greenbelt. There was no suggestion that the site should be removed from the greenbelt.

During the JCS enquiry, site E3 was removed from the greenbelt, despite protest from the residents due to the harm that would be caused to the greenbelt. The stated intention of CBC in making the change to the greenbelt boundary around site E3 was to make it truly "defensible". We therefore find the proposed urban extension incursions into the small remaining greenbelt in the area to be contradictory to this stated intention, and also to a number of paragraphs and stated intentions within the draft Cheltenham Plan and JCS policies.

In respect of site E3, contrary to the conditions of the Extant permission, the developer has cleared the greenbelt features from the site to leave it as a flat, sterile area. This gives an entirely false impression of the street scene which should be one of rural landscape with low-key B1 development "occasionally glimpsed through the hedges" (Inspector's report 2007). The brutal architecture of the BMW building is not in keeping with the area, nor the greenbelt. It can be seen from the surrounding escarpments and is now being used to predicate a hybrid appeal for A and D class development on the site to bring forward the B class development. The application has twice been refused by the Planning Committee, despite Planning Officer approval.

In the absence of a retail policy within the JCS/Cheltenham Plan, and with none of the retail that has been constructed since the 1990's being "planned development" there is considerable concern that retail "contagion" will spread across site E3 and also, to the surrounding greenbelt if the urban extensions are agreed as they are currently drawn in the Cheltenham Plan. The decision by Inspector Peter Jackson on reference APP/B1605/W/18/3200395/3214761 in respect of whether A and D Class are appropriate on this site is due on 1 March 2019.

In addition to the ad hoc retail, residential and other developments since 1990, the area has had much "garden grab" development, again, all off-plan. In each case, the planning officers predicate a recommendation to permit on the basis that the site is "within the urban area". One application has included for the construction of two houses, with an entrance off the South West Distributor Road/Grovefield Way close to the roundabout, and includes the removal of a good portion of the county council Highways hedge to create an access and visibility splay. The hedge was thought an essential design feature for the distributor road in 1992 to mitigate pollution and noise from the village and to maintain its rural character, which is in line with Cheltenham Plan paragraph 7.5. The Planning Committee has twice refused permission, despite Planning Officer recommendation, and the matter is now the subject of appeal (PIN Ref: APP/B1605/W/18/3211518). A date for the decision has still not been set.

With reference to appendix E (pages 21-24 inclusive) sites SO50, SO51, SO52, SO53, SO54, SO55, SO56, SO57 and SO58 are not assessed as a preferred housing site, or mixed-use allocation. SALA variously assess some of the sites as being available for housing and economic uses and some as not being suitable. Site SO52 is referenced as Site 21, The Hayloft, in appendix F for the Minor Amendments to the Existing PUA boundary. Similarly, site 53, the garden land which is attached to it. On each of these sites, the critical constraint is noted as being the greenbelt on the appendix 6 site summary columns. It therefore seems completely counter-intuitive to make PUA incursion into the greenbelt and the reasoning at 12.42 – 12.46 creates a general sweeping statement precedence which we respectfully suggest should

be redrafted, or the proposed urban extension shown on map 3 should not be made and the greenbelt boundary should firmly remain along the western boundary of Grovefield Way.

In the case of The Reddings greenbelt area:

- 12.42 will now extend the urban area well into the greenbelt and define a lot of sites where 10 or less houses could be built, i.e. below the definition of “major development”.
- 12.3 includes a reference to “encouraging consolidation”.
- 12.44 identifies that the PUA would advise developers etc where development is likely to be acceptable and where it is not. Also, to ensure a plan-led and more controlled approach to future development and to allow a presumption in favour of development of sites that are too small to be identified as formal allocations in the Local Plan.
- 12.45 JCS policy SP2 requires an accurate boundary for Cheltenham’s urban area. To extend the urban area in this way would conflict with the greenbelt policy for the last remaining high value area of greenbelt along the south west boundary with Tewkesbury Borough Council. This would be contrary to Proposed Policy GB1; paragraph 5.17 of the Cheltenham Plan; and paragraph 53 of the NPPF; also paragraph 7.5 of the Local Plan.
- 12.46 The authors of the draft plan have “rushed” to review anomalies and redraw a boundary without fully considering the implications.
- Already, Newland homes have made approaches to the Residents Association, local councillors and neighbours, as well as making representations to this examination that they should be granted permission for the construction of 90 houses within the existing greenbelt area, some of which also extends past the proposed urban area extensions.
- The development in the area since 1990 has removed the vast majority of the greenbelt and in doing so, has widely displaced and damaged the local wildlife and habitats, contrary to JCS policy SD9 and paragraph 10.5 of the proposed plan. The proposed incursions of the PUA into the greenbelt will take this past the tipping point.
- We are disappointed that paragraph 10.27 in respect of biodiversity does not actually include any “green policies for development” and we find the plan to be very unambitious in this respect. This comment was also made by Inspector Jackson at the recent public enquiry on the E3 site. The Local Plan treats development in the greenbelt in isolation “on its merits” but should set minimum standards for biodiversity, green roofs, carbon saving, identification and active removal of pollution by various means on greenbelt sites in particular, but on all sites included within the Local Plan.
- Paragraph 11.2 identifies the OAN housing sites for Cheltenham should the inspector agree that the proposed sites HD1-HD8 are viable and meet the allocation, there is no need to “set up” a greenbelt in The Reddings to take “windfall” unplanned development or to invite developers to target the area for development should the OAN falter.
- Paragraph 11.4 identifies the greenbelt constraints in accordance with JCS policy SP1 and aims to deliver development in urban areas and strategic allocations. To extend the urban area into the greenbelt within this small parcel of land within The Reddings, is entirely contradictory.

We respectfully request that the inspector modifies the proposal to maintain the greenbelt boundary along the western edge of Grovefield Way to maintain the stable and defensible greenbelt that the council stated was their intention with the greenbelt amendments initiated within the JCS. The PUA boundary should not be extended as proposed on A3, Map 3. This change will create a stable, identifiable, defensible greenbelt boundary along Grovefield Way, such that the greenbelt policies can be truly implemented.

Thank you.