



## CHELTENHAM BOROUGH COUNCIL

Ms J. Desmond

*Sent via email*

ask for: Tracey Crews  
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email: [tracey.crews@cheltenham.gov.uk](mailto:tracey.crews@cheltenham.gov.uk)  
our ref:  
your ref:  
date: 6 July 2015

Dear Ms Desmond

**Re: 14/00838/FUL**

Further to contact with my colleague Philip Stephenson in regards the submission of comments in response to revised plans for application 14/00838/FUL, please find below a response on behalf of Cheltenham Borough Council. I apologise for the delay in getting these comments to you and thank-you for understanding our recent capacity constraints. The comments provided have been reviewed and endorsed by the Leader of Cheltenham Borough Council.

Whilst the Borough Council does not object to the principle of development it does object to development being brought forward in a piecemeal way, failing to adequately demonstrate its contribution to comprehensive master planning of the strategic allocation proposed by the submission JCS. This requirement for comprehensive planning and development of the strategic allocation was a key reason for Cheltenham Borough Council's refusal of outline permission for 650 dwellings (13/01605/OUT) on the 31st of July 2014.

Having reviewed the revised scheme the Borough Council would wish to add to the comments submitted in our previous correspondence to you dated 1<sup>st</sup> December 2014. I would be grateful if you could bring both this letter and our previous letter to the attention of the applicants and the Planning Committee of Tewkesbury Borough Council and take into account in your consideration of the scheme.

### **Master planning**

Whilst there have been amendments to the scheme, including a reduction in the land take to the sensitive south of the site, the proposals are far from acceptable and do not fit well with the masterplan suggested at earlier stages of our consideration of this area. The result of the masterplan presented is that the built form continues too far towards the AONB. There appears to be no cohesion between the layout subject to application 14/00838/FUL and that proposed in the appealed proposal within CBC's boundary, application 13/01605/OUT.

There is a slight reduction in numbers but the reduction in land-take referred to above and the slight softening of the southern edge has probably pushed up densities further to the north. There are certainly some worryingly dense terrace and courtyard layouts in the northern section of the plan.

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Mike Redman - Director

Environmental and Regulatory Services

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Internal landscape is weak, and does not match the more sensitive approach being proposed in the appealed scheme.

The NPPF has established a strong basis for sustainable development which involves

"...seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including...

- achieving net gains for nature;
- Replacing poor design with better design;
- Improving the conditions in which people live...;
- Widening the choice of high quality homes."

The NPPF states that the Government attaches "great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people."

Elsewhere, NPPF requires developments to function well, create a sense of place, respond to local character, be safe and be visually attractive.

In terms of designing and building places to live these statements mean that the planning system should be creating places which are pleasant to live in and which make a positive contribution to the quality of the local built and natural environment.

Looking at the scheme, parts of the site (particularly the less dense south) will meet some of these objectives (the buildings may be pleasant to live in and have a pleasant outlook), but not all of them. However the northern part of the site will not deliver a "better place for people to live" and has some serious shortcomings. In its worst parts, the site will function badly.

As a whole, the layout does not suggest a strong sense of place which is grounded in a response to local character. The council's Townscape Manager has not analysed the built form, but no matter how visually attractive the built form might yet prove to be, the layout suggests that the scheme will struggle to deliver a satisfactory place to live across the piece and fails to respond to the AONB setting.

#### **Landscape: setting of the AONB**

The proposal site abuts the boundary of the Cotswolds Area of Outstanding Natural Beauty (AONB). Paragraph 115 of the NPPF states that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The duty of regard extends outside the boundary of the designated area to include development or activities which might affect its setting.

The Strategic Landscape Masterplan for the proposed development shows the principal areas of landscape to be around the boundary of the site (Linear Park, Attenuation Lagoon, Farm Lane Woodland), with one central public open space (Central Green). No other public green spaces are proposed within the interior of the site. The main landscape buffer between the southern edge of the development and the boundary with the AONB would be the Farm Lane Woodland. This is wider in the revised scheme than that originally submitted

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which is supported. Nevertheless, it is unlikely that the strategic landscape proposed would provide adequate mitigation given the density of proposed development. Without a reduction in density and the inclusion of more open green spaces, the setting of the AONB would be adversely affected. This would not be in accord with Paragraph 115 of the NPPF or Policy SD8: The Cotswolds Area of Outstanding Natural Beauty (AONB) of the submission Joint Core Strategy (JCS).

#### **Landscape: green infrastructure**

The Design and Access Statement shows the evolution of the proposed development resulting in the proposal to include a dual tree-lined avenue along the primary route through the development, linking Leckhampton Lane and Farm Lane. This is shown in the proposal drawings submitted in September 2014, with street tree planting in verges between the road and public footpath. Unfortunately, this element of green infrastructure has been reduced in the most recent proposals (May 2015). The verge has been almost entirely removed and new street trees proposed only at the access points to the site. Elsewhere along the main route Liquidambar styraciflua street trees have been replaced with Juniper 'Sky Rocket' in front gardens. This change will reduce the mitigation effect of the landscape proposals.

Elsewhere in the proposed development most new tree planting is located in private gardens. This leaves them vulnerable to removal by residents at a later date, which would result in a reduction of green infrastructure in the locality. With little street tree planting there is a danger that the streets will become dominated by parked cars.

Given the sensitive nature of this site, abutting the Cotswold AONB, it requires a more comprehensive green infrastructure strategy – one which can be secured in perpetuity and is reflective of a comprehensive masterplan for the wider strategic allocation as proposed by the JCS. Policies of note within the Submission JCS are SD7: Landscape and INF4: Green Infrastructure.

The landscape design should have regard for the landscape character of the area – in this case Settled Unwooded Vale transitioning to Cotswold AONB Escarpment. With the landscape character as a starting point a design should be developed around a green infrastructure network which complements the landscape character. This would inevitably lead to a reduction in density of built form.

#### **Conclusions**

The conclusions drawn by Cheltenham Borough Council following review of the revised plans remain as set out in our letter dated 1 December 2014. The Borough Council support in principle the location of this proposal for strategic development as set out in the Submission JCS. However, considers that the scheme has failed to demonstrate how the development proposed fits appropriately within a wider master plan for the area and that if this site is progressed in isolation that it will not prejudice the sustainable development of the remaining part of the strategic allocation proposed by the JCS.

Cheltenham Borough Council has concerns over the landscape and visual impact of the proposal with regard to the AONB, the density of the proposed development and the lack of information as to how the scheme will contribute to the economic role of sustainable development by ensuring that development requirements are co-ordinated, including the provision of infrastructure.

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It is the Council's view that whether the applicant relies on the adopted 2006 Tewkesbury Borough Council's SD2 allocation policy, or the emerging allocation in the JCS policy SA1 (plan A6 strategic allocation) in support of the development; there is an undeniable requirement within both of these for the development to be carried out comprehensively to integrate well with the rest of the South Cheltenham Leckhampton area proposals.

Should you wish to discuss any of the points of this letter or my previous correspondence, please do not hesitate to get in touch.

Yours sincerely



**Tracey Crews**  
Head of Planning