

Thank you Chairman

Hugh Lufton - Planning Consultant Chartered Town Planner - representing LEGLAG.

Limited time to address committee – like to refer members to the Submitted 'Blue Pages' **submitted - Grounds for Refusal.**

Obviously this is a significant proposal for Cheltenham – it will have significant impacts on the locality – the AONB – the local road network – services.

But approving this application NOW would have a significant impact on prejudicing the whole direction of planning for town.

## **HOUSING SUPPLY**

Of course we want to ensure that the future population have good housing – and a choice of housing.

Good planning and good planning decisions are about housing in the right place and at the right time.

Should not just be when the development industry see a profitable opportunity and a hiatus in the Development Plan.

### **5-year land supply –**

Much is made of the government's policy about - ensuring a 5 year land supply - one of the most contested issues at appeals.

5 year supply - Must not be the only consideration – assure you elsewhere it is not – Secretary of State himself has recently refused applications – where this '5-year land supply' is only 0.7 years Land off Glebelands in Thundersley in Essex – a recovered appeal – July 2013.

There is housing land in Cheltenham – Housing Land supply show there is planning permissions for 2,000 dwellings on the ground now in the Borough.

Council can update.

4.7 years in Cheltenham Borough.

## **PREMATURITY**

Everything about this proposal feels rushed and pushed.

Your JCS at Pre-Submission is a Plan for the future of the Boroughs to 2031 not 2020 not 2015.

I understand that Full Council on 9<sup>th</sup> April were still looking at evidence about the overall housing numbers and at 28<sup>th</sup> February Full Council resolved to remove Leckhampton as a JCS Strategic site.

This proposal is a major component of that Strategy and if approved now prejudices that JCS process that's simply not yet concluded.

JCS has not been through Public Examination.

## **NOT A COMPREHENSIVE PROPOSAL**

This proposal is uni-lateral just one part of a strategic allocation.

There's no substantial evidence of the landowners/developers working together. No joint Masterplan.

There can't be assurances that necessary infrastructure can be delivered adequately – across the much larger strategic allocation.

Been very clearly envisaged by the LPA's for this location to in anyway be acceptable in must be a comprehensive scheme,

## **ENVIRONMENTAL STATEMENT UNDER-ESTIMATES THE IMPACT**

The ES accompanying application under-estimates the env. impacts.

Substantially under-estimates the landscape impacts and visual impacts to and from the AONB.

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## **STOPPED**

In under-estimating these impacts what the ES is saying is that this site is much more influenced by the adjoining urbanity of Cheltenham than it is any the AONB and the broad countryside. This is not true.

The LVIA assessment and description of CA1 and CA2 land units (CA1 particularly) continually refers to them as *'already heavily influenced by urban edge land'*, *'urban edge land uses'*, *'urban characteristics and unmanaged / neglected landscape'* and *'urban fringe land uses... surrounded by built development'*.

These descriptions are used at

**paragraphs 6.5.4.1, 6.5.4.2, 6.5.5.2, 6.5.8.1, 6.5.8.2, 6.5.8.8, 6.5.8.10, 6.5.9.1, 6.5.9.2, 6.5.9.3, 6.5.10.4, 6.5.10.5, 6.5.10.6, 6.6.3.1, 6.6.3.2, 6.6.3.4, 6.6.9.3, and 6.7.2.1.**

Proposal offers lots of mitigation but to mitigate substantial development you need to plant lots of trees and if you plant lots of trees all the views to the AONB from the south of Cheltenham will be lost.

I understood that this Council strongly protected the integrity of the AONB

## **TRAFFIC, TRANSPORT AND HIGHWAYS**

Refer to Statement made by ENTRAN - Blue Pages.

The traffic modelling that supports the application advises that by 2023 traffic conditions in across Cheltenham resultant of all development proposals will increase;

1. The number of over capacity queues at junctions by 1000% (150 to 1,500)
2. Total travel time by 40%
3. Total distance travelled by 20%.
4. Transient queues by 60%

Local impacts and wider cumulative impacts on network from this proposal and other pipeline developments and SA's. All impact on network.

Critically the HA doesn't consider impacts at junctions are severe because it assumes all TP measures will be successful. Very optimistic modal shift to sustainable modes.

Entran don't agree impacts on Kidnappers Lane are minor.

Serious ? of TA accuracy. ? of HGV flows that are wrong.

Entran also seriously ? the pedestrian and cycle infrastructure will cope and this is a requirement for modal shift.

Just not assured at all that this proposal is in the right place and absolutely not assured it's at the right time.