

<b>APPLICATION NO:</b> 15/00202/FUL	<b>OFFICER:</b> Miss Michelle Payne
<b>DATE REGISTERED:</b> 4th February 2015	<b>DATE OF EXPIRY :</b> 1st April 2015
<b>WARD:</b> Pittville	<b>PARISH:</b> NONE
<b>APPLICANT:</b>	William Morrison Estates
<b>LOCATION:</b>	3 Cleevelands Drive Cheltenham Gloucestershire
<b>PROPOSAL:</b>	Demolition of existing dwelling and construction of single block containing 9 apartments, alteration to site access and associated hard and soft landscaping

### **ADDITIONAL REPRESENTATION**

Plan A Planning & Development Ltd  
Suite D  
Swan Yard  
9-13 West Market Place  
Cirencester  
GL7 2NH

**Comments:** 13th July 2015  
Letter attached.



Our ref: AP/P/R-011  
Your ref: 15/00202/FUL

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Planning Services  
Cheltenham Borough Council  
Municipal Offices  
Promenade  
Cheltenham  
Gloucestershire  
GL50 9SA

13 July 2015

Dear Sirs,

**RE: 15/00202/FUL – 3 CLEVELANDS DRIVE, CHELTENHAM, GLOUCESTERSHIRE**

Further to publication of the officer's report to Planning Committee on Friday 10<sup>th</sup> July 2015 in respect of the above application, I am instructed by a number of local residents to submit further representations on their behalf.

As confirmed within section 5 of the officer's report, **at least 100 objections** have been received by the Borough Council in respect of the proposed development. A bulleted list of the grounds on which these objections are based is set out within the officer's report, and the associated issues are each referred to within the officer's assessment.

I fully endorse the officer's conclusions in respect of design, layout and the significant intensification of the existing residential use (section 6.3 of the officer's report), but consider that insufficient weight has been attributed to the harm to residential amenity that is likely to arise as a result of the proposed development (section 6.4). Furthermore, notwithstanding the views of the highway authority, local residents are well placed to understand the likely impact of the proposal on highway safety (section 6.5) and their views should therefore also be attributed more significant weight.

However, my main concern in respect of the officer's report is that it fails to address the specific policy implications of the Council's current housing land supply position. This is a potentially critical omission, given that the applicant's revised Planning Statement (Evans Jones Ltd – 12<sup>th</sup> May 2015) appears to imply that the Council have little option other than to approve the proposal due to a shortfall in the five year supply of housing land within the Borough. However, any such implication is not a balanced reflection of national planning policy, as set out within the National Planning Policy Framework (*the Framework*).

It is acknowledged that para 49 of the *Framework* states that policies for the supply of housing should not be considered up to date where a local planning authority is unable to demonstrate a five year

supply of housing land. However, in such cases, para 14 makes clear that permission should not be granted where:-

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits;
- Specific policies in the *Framework* indicate that development should be restricted.

In this case, **significant and demonstrable harm** has been identified by both objectors and the local planning authority in respect of the design and layout of the proposed development which clearly outweighs the limited benefits arising from a small increase in housing supply. Furthermore, the *Framework* contains specific policies in relation to the design of new development. In particular, para 56 confirms that good design is a key aspect of sustainable development and indivisible from good planning, such that *“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.”* [para 64].

Therefore, notwithstanding any shortfall in housing land supply, there remain clear and defensible grounds upon which to refuse planning permission for the proposed development. Accordingly, the Planning Committee are urged to add conflict with para 14 of the *Framework* to the proposed reason for refusal.

Yours sincerely,

A large black rectangular redaction box covering the signature and name of the sender.

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