

APPLICATION NO: 18/00704/FUL		OFFICER: Mrs Victoria Harris	
DATE REGISTERED: 11th April 2018		DATE OF EXPIRY : 6th June 2018	
WARD: Benhall/The Reddings		PARISH:	
APPLICANT:	Arlo Homes Ltd		
LOCATION:	Blenheim Villa, The Reddings, Cheltenham		
PROPOSAL:	The erection of two dwellings, and formation of new vehicular access.		

REPRESENTATIONS

Number of contributors	26
Number of objections	24
Number of representations	0
Number of supporting	2

Fernleigh
The Reddings
Cheltenham
Gloucestershire
GL51 6RY

Comments: 7th May 2018

As the destruction of Cotswold View and the resulting monstrosities which are being built in it's place aptly demonstrate, garden grab infills in The Reddings are a bad idea in principle and execution. If you couple that with the excessive over-development the area has suffered in recent years and the continued onslaught by developers we are experiencing, the negative impact of this proposal is clear.

That aside, these are my objections;

- 1) Removal of the hedgerow. The impact on wildlife is obvious.
- 2) Grovefield Way is a link road. This type of application, with access points off the carriageway, was established as undesirable when it was built. Previous applications have been rejected on these grounds, and nothing has changed in this application.
- 3) Grovefield Way is now over-used. The chaos of delivery lorries, refuse collections, visitor parking, site traffic during construction and so on, will all add to the mayhem of this road. We will end up with something next to BMW, even if it isn't the Aldi/Costa madness and this will just compound the problems.
- 4) Safety. It's next to a roundabout. On a busy road. It's a stupid idea.
- 5) Visibility splays. As the CC won't be interested in maintaining the hedges so sight-lines can be guaranteed, the whole thing becomes untenable.
- 6) Precedent. Each of these inappropriate developments that get through, add weight to developers trying to make the case for carving up more of our community and destroying more of the Green Belt. The fact that they cite Cotswold View to make the argument here proves this. In time, the folly of that application will be proven and, as with BMW before that, Councillors who voted for it will be quoted again saying 'I hadn't realised it would look that bad. Had I known, I would have voted against it.' I suspect the same will be true here, if it gets approved.
- 7) New homes quotas can be met elsewhere in the JCS.

So there you have it. Seven good reasons for rejecting this (there are probably more). The only reason for passing it - developer greed.

I object.

22 Long Mynd Avenue
Up Hatherley
Cheltenham
Gloucestershire
GL51 3QN

Comments: 8th May 2018

I often with my wife use this cycle/footpath along with many other people from the surrounding area where the proposed access to the busy main road is going to be. What is the point of creating safe areas for people to use, if the result is having to be aware of vehicles accessing across path all the time.

Salalah
The Reddings
Cheltenham
Gloucestershire
GL51 6RT

Comments: 1st May 2018

The planned access for these new dwellings is extremely silly and downright dangerous
We do not need these additional dwellings so they are completely unnecessary
They will be an eyesore on the lovely setting of this part of The Reddings

Iona
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 9th May 2018

I wish to object to this application on the following grounds:

- 1) When Grovefield Way was built the decision was made that no private dwellings would exit on to the road.
- 2) The plans show that there are parking spaces for 2 vehicles at each of the 2 dwellings but the application quotes 8 spaces. if there were 8 vehicles parked there would be no room to manoeuvre and cars would be forced to reverse onto the road.
- 3) Vehicles exiting this development would cross the cycle path and foot path and would cause obstruction whilst waiting to join the road. Also, the exit does not have a clear view to the left and traffic coming off the roundabout.
- 4) There is no provision for vehicles to wait whilst turning right across the carriage way to gain access from the South, this could cause a hazard to traffic exiting the roundabout.
- 5) There is no space for a refuse collection vehicles within the development which would mean they would be forced to park on Grovefield Way whilst collecting the refuse from the properties.

Flowerdale House
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 4th May 2018

Whilst I can see the sense in the infilling of this garden scheme which will have enormous economic benefit to the landowner I have reservations on 3 counts which leads me to object:

1. This development is directly opposite Green Belt land which has been subject to speculative applications by a large local company and a housing development company, plus, I suspect, the owner of Chesnut Farm is watching this application closely. Close control needs to be maintained in this area to prevent inappropriate development and maintain the Green Belt barrier between Cheltenham, Churchdown and Gloucester.

2. The required removal of the hedgerow to allow the suggested access will have an impact on local wildlife which has already been significantly impacted by another local but major development (BMW). The street scene along Grovefield Way would be significantly impacted by a break in a continuous hedgerow from the nearby roundabout to the B&Q development save for a small gap to allow pedestrian access to North Road West.

3. Grovefield Way is a designated Distributor route which is severely congested at peak times, carries cars at 40mph (and often significantly higher speeds) and is on a quite significant curve. What is more the access is across a well used cycle track which helps the sustainable transport policy of the local authority which has been quoted in support for local employers GCHQ, B&Q, Asda and BMW. Another break in this cycle path is dangerous for cyclists and may well encourage cyclists to use the main carriageway as they will have one less break in the cycle path to cope with.

Whilst previous applications on this site have been rejected with access off The Reddings down the side of Blenheim Villa I think access here would be significantly better than that which is now proposed for the above reasons.

I therefore object to this planning application in this format

4 The Grange
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 9th May 2018

1. I'm surprised that Cheltenham Borough Council have elected not to require display of planning notices for this application. The Emerging Local Plan has specific guidelines to moderate and control garden grabbing which this is.

2. The application will need to destroy the existing hedgerow which shields property behind from the road noise, and possible BMW noise from the new site.

3. Vehicles accessing the site will have to cross both the pavement and cycle path, blocking the cycle path. And safety of users cyclists and pedestrians will be jeopardised by this.

4. stormwater will be disposed of to a soakaway, but the geology of the area is a heavy, impermeable clay where a very high number of trees and hedges are being proposed for removal. Significant ground heave problems will occur as the clays rehydrate at differing rates.

The design is therefore thought inappropriate and not capable of acceptance. In respect of surface water treatment.

5 The applicant at 13b of the application says that no important habitats, trees or hedges are to be removed. This is entirely untrue. This can be seen by the number of deaths of hedgehogs along the Grovefield Way in the past 2 weeks. All of which have been registered on the <https://www.hedgehogstreet.org> website.

6 I agree and support all of the objections also put in the comments by the Reddings Residents Association submission.

7. Entry of vehicles out of the site and across the cycleway would not be expected. Pushchairs would be a risk from emerging vehicles.

8 There are no precedents to break the hedge in the visual street scene to provide access for two properties.

9. The landscaping sensitivity is high. Development will "cause harm to the architectural integrity, townscape and environmental quality of the area by eroding open space around the existing buildings" contrary to the JCS criteria set out in SD4B and SD4C.

10. No consultations have been made with regard to biodiversity and geodiversity. However, neighbours identify bats, sparrows and buntings as protected species. The site is clearly in use by hedgehogs.

11. The project does not enhance ecology, landscape or biodiversity in any sense; it simply provides a significantly reduced environment to that which presently exists. Proper consultation and surveys are required. The application proposes felling large areas of hedge and subsequent trimming and maintenance of a hedge that is not under the ownership or control of the applicant, for the benefit of the two private dwellings and the pecuniary gain of the applicant. Such maintenance would be at public expense if the project is allowed, and is not acceptable.

12. The applicant assesses the hedgerows as being in accordance with the DEFRA 2007 criteria to be listed as "habitat of principle importance for the purpose of conserving biodiversity in England" section 41 of the NERC Act 2006. A much greater portion of the hedge than the applicant shows will need to be removed in order to comply with the requirement for an estate car and refuse vehicle to cross.

13. The applicant does not show the views from Grovefield Way of the continuous hedge and the significant biodiversity that it affords as an intact hedgerow in his submission. It is also noted that applicant's hedges H2 and H3 are also listed as intact hedgerows which are species-rich and also compliant with the DEFRA 2007 "criteria to be habitat of principle importance".

14. Preservation of trees should be most important issue since the destruction of the environment on the BMW site. They should not to allow them to be felled simply for relatively low value development purposes.

15 The granting of such an approval will encourage, and reward, such thinking and set further precedents for inappropriate development in The Reddings area.

16. For all of the reasons listed above, the application must be refused.

Ragged Stone
Old Reddings Road
Cheltenham
Gloucestershire
GL51 6RZ

Comments: 2nd May 2018

I'd like to offer my support for this application for a high quality scheme. The proposal has clearly been well thought through with advice sought by consultants, which is not always the case.

Cheltenham is a desirable place to live and two bespoke, architect designed homes offer far more character than the typical edge of town developments which are a repeat of two or three designs.

These two will be snapped up as soon as they hit the market. As a Reddings resident I can attest to the need for decent sized family housing, particularly where the existing infrastructure can cope with the development.

I cannot see an issue with access as Grovefield Way offers extended views in both directions and the driveway is well set back. Both North Road West and the BMW development access this road without issue. The mature hedgerow appears to be mostly retained on the plans and would provide a good level of privacy.

Lastly, the development ties nicely into the existing roofline between the neighbouring properties.

2 Barrington Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6TY

Comments: 8th June 2018

Object

Carobs
The Reddings
Cheltenham
GL51 6RL

Comments: 9th May 2018

Repetition occurs frequently when objections are raised to Planning Applications. To avoid this situation we endorse all the comments submitted by The Reddings Residents' Association on Tuesday 08 May 2018' and support the view that the application be refused.

22 Barrington Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6TY

Comments: 18th April 2018

So I'm assuming this will be refused as it was previously in 2002 as nothing has altered apart from the more recent info on garden grabbing: <https://www.gov.uk/government/news/new-powers-to-prevent-unwanted-garden-grabbing>.

Apart from the destruction of the fantastic habitat for small birds and animals, the access to the incredibly busy main road, across a bicycle lane and very near to the roundabout would be an accident waiting to happen.

24 Barrington Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6TY

Comments: 7th May 2018

I strongly object to this application for two dwellings to be build on the garden within Blenheim Villa, The Reddings, Cheltenham for the following reasons:

1 - Approval of new housing under the JCS

There are already enough houses that have now been approved by CBC within the Joint Core strategy until 2031 to meet current and future requirements for Cheltenham. In the short term the very large developments currently underway in Leckhampton and Bentham to name a few both of which are within 3 miles from this proposed development provide opportunity to purchase houses in the area. As at 06/05/18 there are currently 20 4 bedroom detached houses within a 1 mile radius of the applicants address for sale of which 6 of these have been reduced in price providing plenty of opportunity for people to move into the area in already establishes homes.

2-Comprised Highway Safety

The location of the proposed access to this development couldn't be in a more dangerous position. Grovefield Way is part of a sensitive Highway Network and is a local distributor road and subject to congestion at peak times. The proposed access to the development is on a substantial curve and within the hardest braking zone of the approach to the Redding's roundabout and the fastest acceleration zone in the opposite direction. At rush hour AM and PM this would be an incredibly difficult exit to join the busy road. Any of the proposed vehicles trying to gain access to the site or leave the site would be significantly blocking the cycle/pedestrian path upon leaving the site and the road upon entering.

There is no provision for visitors parking or delivery vehicles, if vehicles/vans drive onto the site and into the central point allocated as the turning area especially when all of the 4 allocated parking spaces are utilised there would be no option but for them to reverse out of the site onto Grovefield way or the cycle path and pavement in an attempt to re-join Grovefield way. This is incredibly dangerous for pedestrians, cyclists and other vehicle users of Grovefield Way and goes against the Highways Agencies recommendations for safe access to and from the site.

3 - Loss of wildlife

There would be a substantial detriment to long established wildlife should the suggested access point be approved. There are squirrels and I believe possibly bats present (evidence to follow) in the area around Tree T11 (Arboricultural Survey) and T4 (Ecological Appraisal) and a large area of hedgerow would be removed solely for the purpose of allowing access to the site. The Preliminary Ecological appraisal report provided by Focus Ecology - dated Feb 18 provided as part of the developers documents notes that:

Hedgerows: Hedgerow 1 and Hedgerow 2 meet the criteria to be defined as 'species rich' as they both contain five or more native woody species (Defra, 2007). All of the hedgerows on site meet the environmental criteria (BRIG (ed. Ant Maddock), 2008) to be listed as a 'habitat of principal importance for the purpose of conserving biodiversity in England as listed under S.41 of the NERC Act 2006.

A large section of hedgerow 2 will be removed for the sole purpose of allowing access to this propose development.

Page 8 3.3 Protected/Notable Species

Birds: House sparrow and dunnock were recorded on site. The house sparrow is a red listed bird of conservation concern owing to significant decline in population of over 50% since recording began in 1969 (Eaton et alii, 2015). The house sparrow is listed as a 'species of principal importance in England under section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. The Dunnock is amber listed due to longer term declines in breeding populations of more than 20% but less than 50% since 1969 (Eaton et alii, 2015). The report concludes that 'It is likely that both the house sparrow and the dunnock utilise the hedgerow and scrub on site for both nesting and foraging and they are therefore likely to be directly impacted by any future development of the site'.

4- Detrimental impact for residents of Barrington Avenue

The positioning of the houses would have a detrimental impact on our privacy, the new houses would directly overlook our garden, rear bedrooms and conservatory. The amount of trees that would need to be removed to make way for this development would be a substantial loss to both our privacy and our current outlook. It is anticipated that we would also experience a significant increase in noise pollution from the traffic using Grovesfield Way and light pollution without the large trees and hedgerow to block it.

There are other issues that I wish to raise, a full detailed objection will follow via email.

Comments: 21st May 2018

Please find enclosed some supplementary comments that I would like to add to our already documented objection to planning application -

I would like to reinforce the concerns we have regarding access to the site and the impact the unsuitable development design will have on Grovesfield way.

The developer has enclosed a letter dated 20th December 2017 by the Highways Development Management which states that in principle a new access site in this location may be acceptable subject to certain information being considered and provided at application stage.

The swept car analysis (SPA) undertaken by the applicant has been carried out as per the Highway letters recommendation of two estate cars, however, they fail to address or even mention the issue of servicing and waste collection. The Highways letter states that if the development is to accommodate a refuse or service vehicle then an additional SPA would be required to be undertaken of a refuse vehicle passing an estate car, to the best of my knowledge from the documentation provided to us during this consultation period it does not appear that this has been done and the document access point is not wide enough to accommodate this type of vehicle.

The applicant has stated on their application for planning permission form dated 05/04/18 in section 7 that the plans 'incorporate areas to store and aid in waste collection' and that waste and recycling is 'as per CBC waste collection and recycling standard policy'. The CBC document 'Requirements for refuse and recycling provision at new developments' along with the Gloucestershire County Councils planning document 'Manual for Gloucestershire Streets has

clear guidance on the type of roads that are suitable for refuse and service vehicles in new developments including those where a turning area is included. The proposed plans do not meet guidelines set out in either of these documents for safe access to development.

If the area is not suitable for refuse and service vehicles etc then the householders at these proposed new homes would have to place their waste at the kirb side which would be on the pavement/cycle path and the collection lorries would have to park up on Grovefield Way in order to collect their waste. As CBC operates a kirb side recycling scheme whereby the refuse collectors sort the recycling into the relevant areas of the collection lorry at the point of collection this could be for a substantial period of time and would surely lead to health and safety concerns for the CBC refuse workers and members of the public.

The same principle to the lack of safe access to this site would apply to other every day vehicles such as delivery vans, postal vans, utilities vehicles and more importantly emergency services vehicles such as fire engines or ambulances. If they drove into the development there would be no suitable parking and this would result in vehicles either driving in and being forced to reverse back out onto Grovefield way or reverse onto the pavement and cycle path in an attempt to rejoin Grovefield Way or vehicles parking on Grovefield way and walking into the development.

I also fail to see how large construction lorries/ cranes/ delivery vehicles and the workers associated with the development of the site will safely access the site to park and carry out the necessary deliveries of materials during the development stage without causing mass disruption on a very busy road at a poorly placed access point.

I hope that these points will be taken into consideration along with all of the other points raised during the consultation period.

Fayrecroft
North Road East
The Reddings Cheltenham
Gloucestershire
GL51 6RE

Comments: 1st May 2018

I object to this planning application for three principal reasons:

Safety:

I have been looking at the transport statement for Blenheim Villa and have extracted three quotes from the report:

Gloucestershire Highway quote:

"It must be noted that Grovefield Way is regarded as a local distributor road for the South West of Cheltenham, linking the A46 and A40. There are a few access junctions serving large developments and the occasional historic access. However there are few private accesses serving small residential developments taken from Grovefield Way. It must be robustly justified as to why the new access off of Grovefield Way is required and why it should be regarded as acceptable".

This looks good and it is a reasonable point that any new access from a local distributor road would have to be justified and acceptable.

And yet Cotswold Transport goes onto to say:

Visibility Section -" The Audit Team consider that vehicle speeds on Grovefield Way at the location of proposed access are likely to be slightly higher than those recorded as the access is located within the 40mph speed limit and further away from the roundabout which would influence vehicle speeds".

and :

11.2 "No wet weather reduction in the recorded speeds has been made in order to provide a robust analysis".

The way I have interpreted this is that cars will be going faster past the access point than the speeds recorded on the survey and that , it is assumed, that drivers will automatically go slower in wet weather.

A number of points need to be raised:

a) Do we really want the residents coming out of the two new houses, when it is likely that the traffic is still travelling at around 40 mph, which is higher than most residential areas?

(Also one needs to take into consideration that many drivers will have just come off the M5 and A40 Golden Valley and will have become accustomed to driving at much higher speeds.)

b) It is a rather broad assumption that cars will be going slower during wet weather. I have been driving for 31 years and don't seem to have noticed this, especially on motorways. Many police programmes suggest that driving in very wet weather is as dangerous as driving in snow.

c) Any future increase in traffic from the undeveloped Grovefield site is not taken into account and cannot be until the future use of the site is known. Already we have seen very large car transporters trying to negotiate around the area.

d) The drivers' reaction times seem to assume normal behaviour. However studies have shown that most accidents are not caused by mechanical failure, but through human error whether impaired by alcohol or drugs or not. Sadly, I still witness drivers using mobile phones while driving.

Loss of green habitat:

I fear that this would set a precedent for further loss of green space and habitat, which has already been severely placed at risk in the area following the loss of the green belt status of the undeveloped part of the Grovefield site.

Marketability and need.

The JCS has earmarked sufficient housing until 2031. Do we need more?

I fear that this application has been hastily made without due consideration to its marketability and its position near to a busy road.

As an example, there is a modest new house in a nearby village which has been built on a former garden, in a position that was deemed unsuitable by the Parish Council owing to its proximity to the A46.

I believe it has now only just been sold subject to contract after being on the market for over 6 months and after I believe at least 4 reductions in price. (The final price may be even lower; it is too early to say.)

Are we not in danger of promoting short term development for the sake of a quick profit, that may in reality be illusory? This is neither good for the developer, nor the local community.

Comments: 9th May 2018

I thoroughly endorse the very well researched and supported arguments of The Reddings Residents Association in objecting to this proposal.

As such I do not wish to repeat any of the issues raised.

However, I would like to add my own personal comment.

For most of my professional career I dealt with family bereavements. The most traumatic involved the sudden and tragic loss of life through motor accidents.

Perhaps the most shocking was when a driver pulled out of a poorly designed exit onto a busy road and where he and his passenger were instantly killed by an oncoming lorry.

Although a police investigation was set up to find out what had happened, this did not help the family who lost both their parents, nor the lorry driver who had two deaths on his conscience.

Road safety should not be compromised for the sake of a quick perceived profit.

The safety of this proposal needs to be revaluated before any work is carried out.

Comments: 22nd May 2018

I have been reading the GCC Highways report with interest, especially as it quotes:

"The carriageway is 2 way working with a posted speed limit of 30mph,"

It is a 40 mph road.

How can the report be taken seriously when it contains such a fundamental error?

Secondly, I would like to discuss the hedge.

It seems that the visibility of the splays is dependent upon the hedge being effectively trimmed.

Will the cost of the hedge maintenance be reflected in an increase in the council tax for these two houses?

It seems unfair that the rest of the community would have to subsidise the cost.

I understand that the Wildlife and Countryside Act prevents hedge trimming between certain months to protect wildlife (and quite rightly so).

I have looked at the hedge and it contains fast growing species such as hawthorn.

If the hawthorn growing in my back garden is anything to go by, it only takes some favourable weather conditions to encourage rapid growth.

This may or may not coincide with strict calendar dates of when trimming can be carried out.

Furthermore, I understand that the concept of a wildlife corridor relies on a continuous unbroken line of vegetation. The creation of the new access would destroy this very valuable concept.

Also, the removal of part of the hedge to create the vehicular access would destroy a valuable acoustic barrier and lead to higher noise levels in Barrington Avenue.

Residents in North Road East have seen increased noise levels following the removal of vegetation following the creation of the BMW showroom.

I feel that the potential safety, wildlife and noise issues outweigh the advantages of two new houses.

8 Frampton Mews
The Reddings
Cheltenham
Gloucestershire
GL51 6UG

Comments: 4th May 2018

Access is off a very busy main road, across a busy pedestrian path and cycle path.

Lynwood
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 8th May 2018

I object to this development on the following grounds:

- 1) The proposed access onto Grovefield Way would be dangerous. It is a very busy 40mph road and the driveway access would be very close to the roundabout. Grovefield Way and the housing on the east side of it were designed so there are no access points. Allowing access onto Grovefield Way would be a disturbing precedent for other proposals.
- 2) The access would cut across the cycle path, which is supposed to encourage cyclists. With the investment to improve the cycle path on Up Hatherley Way (going towards Morrison's), it seems a bit daft to be placing obstacles in their way here to discourage cyclists. Again, allowing access onto Grovefield Way would be a disturbing precedent for other proposals, which would completely negate the cycle path.
- 3) The hedgerow on Grovefield Way is a haven for wildlife and it would be a disadvantage to remove it - the same issue for the removal of trees on the plot to build the houses.
- 4) I do not feel that the proposal is consistent with the Cheltenham local plan, as it a 'garden grab' and removes green space and trees from the environment. This plan has required a huge effort from the Planning Department, and it should be adhered to. The new homes quota is already met in the plan.
- 5) I believe the proposal would exacerbate flooding risk, as I have noticed standing water on the ground in the plot.

I do not understand why notices have not been displayed, as it seems that this proposal could have a wide ranging effect on local residents, apart from just next door neighbours. If local residents dare unaware of a proposed development, then it does not seem a transparent approach to planning and allowing people to make comments.

Badgers Mount
Branch Road
The Reddings Cheltenham
Gloucestershire
GL51 6RP

Comments: 29th April 2018

This is a seriously unnecessary and crazy application

1. The access to the site is very close to a really busy roundabout on the approach with limited view, if you personally inspect the proposed access at peak traffic times you will see how dangerous this proposal is.

2, Trees and hedges will need to be removed and this is against the agreement in the local plan as it will effect wildlife

3. There are already enough houses that have been approved until 2031, there is no need for anymore

4. There has been no notification or consultation with local people - this is unacceptable

We strongly object to this proposal on safety and wildlife grounds and the fact that there is no need for further housing in Cheltenham

The Reddings Residents Association

Comments: 25th April 2018

We attach our copy of a preliminary objection and query why the planning notice is not being displayed anywhere on the site, why TRRA are not listed as a constraint/consultee, why we have not been pre-consulted per NPPF, or kept advised of this matter by Councillors?

Responses would be appreciated.

In the meantime, the period for consultation must not commence, until the statutory notices are displayed.

Please confirm that this will be "called into" committee for a planning decision following proper consultation.

We look forward to hearing from you ASAP please.

1) Why is The Reddings Resident's Association not a consultee?

2) Why is The Reddings Resident's Association not listed as a constraint?

2) No planning Application advisory notice is being displayed at the subject site. The comment period must be reset/extended until the proper notices are properly displayed.

3) The application represents a major departure from the emerging the local plan, requires a road entrance on Grovefield Way (an orbital road), close to a roundabout & is inappropriate.

4) The application is entirely unsuitable for delegated authority. It must be a committee decision.

5) Detailed objection to follow.

We will email you separately with a copy to Councillors requesting an urgent response.

Comments: 8th May 2018

The Reddings Residents' Association (TRRA) object.

1. Further to our initial comments on 25 April 2018, we remain surprised that Cheltenham Borough Council have elected not to require display of planning notices for this application. This has been raised with a planning officer. Our interpretation is that the site does not fall within the provisions of the development plan in force in the area in which the land that is the subject of the application relates. The officer advises that the site is an infill site within the Principal Urban Area (PUA) and as such, developments are in line with the provisions of the development plan, although they may still be found to be unacceptable assessed against the specific, more subjective policies, and may go on to be refused. As such, whilst notices do not need to be displayed, and whilst this may be a strict interpretation, it does not seem to be within the spirit of the JCS, NPPF, nor the Emerging Local Plan in respect of consultation with the local community. On 9 June 2010, councils were given immediate power to prevent the destructive practice of garden grabbing through similar, inappropriate, classification of gardens as "previously residential land" in the same brown field category as derelict factories and disused railway sidings. Councils were provided with the power to decide what level of density is appropriate for the area and close the loophole. The Emerging Local Plan has specific guidelines to moderate and control garden grabbing.
2. The application is technically invalid. The applicant does not seem to identify that the hedgerow that needs to be cut down is not within their ownership. Along the boundary with Grovefield way, the arboriculturalists and environmental reports identify two hedges; H1 and H2. H2 is within the curtilage of the applicant's site. The boundary of the applicant's site is clearly marked in red on the plan and does not include hedge H1, which is under the care and ownership of Gloucestershire County Council/Highways. The hedge was planted as a noise screen for the south west distributor road (Grovefield Way) between 1988 and 1992. The applicant does not identify that notices have been served on Gloucestershire County Council in this connection. Notice needs to be served for the application to be valid.
3. The application form indicates that provisions for refuse collection are identified on the drawings but we are unable to identify them.
4. The application form indicates 8 car parking spaces provided. This is not in accordance with the Local Plan, second review table for dwellings outside of the core commercial area.
5. Vehicles accessing and egressing the development will, of necessity, have to cross both the pavement and cycle path. Whilst awaiting gaps in traffic, vehicles would be blocking the cycle path, thus forcing cyclists to use the pavement; safety of users will be jeopardised by this. This at a time when cycling is being promoted in the area, with the new cycle path being created further along the same link road (Up Hatherley Way).
6. The applicant indicates that stormwater will be disposed of to a soakaway, but the geology of the area is a heavy, impermeable clay where a very high number of trees and hedges are being proposed for removal. Significant ground heave problems will occur as the clays rehydrate at differing rates. Use of soakaways will further exacerbate very uneven ground recoveries, and pipes will fracture or develop backfalls. Lightweight attenuation/soakaway crates such as Stormcell will become displaced and ineffective as pipes will fracture or develop backfalls. The design is therefore thought inappropriate and not capable of acceptance. In respect of surface water treatment.
7. The site is presently used as a smallholding/agricultural use, rather than a garden. CBC should clarify whether the land is actually designated as garden rather than agricultural under Section 65 (8) of the Town and Country Planning Act 1990.

8. The applicant at 13b of the application says that no important habitats, trees or hedges are to be removed. This is entirely untrue, as his own arboricultural and conservation reports detail.

9. For the reasons above, we believe that the application should not have been registered, and that the application is not valid. Notwithstanding, we will discuss the merits of the application against the various headings of concern in the items below:

Transport

10. The applicant refers to the pre-application advice from Gloucester County Council (GCC) and states that the conditions have been met. However, the applicant relies solely upon his own traffic survey along a section of Grovefield Way between Tuesday 9 January 2018 and Monday 15 January 2018. Department of Transport TAG Unit M.12 "Data Sources and Surveys" identifies that surveys must only be carried out during neutral months. Neutral months are March, April (excluding Easter), May (excluding Bank Holiday weeks), June, September (excluding return to school weeks), October and November. Neutral months are ones which avoid main and local holiday periods, local school holidays, half terms and other abnormal traffic periods. January is not a neutral month and observations of the Highway Network Operation gathered cannot be considered representative and must not be used to assess the impact of this development proposal.

11. GCC identify that Grovefield Way is a local southwest distributor road, with few private entrances, and that GCC will require robust justification of why a new access is required and why it should be regarded as acceptable. There is no robust justification set out by the applicant. This is a small development on "agricultural" ground. Despite speculation by the applicant that an agricultural smallholding is inappropriate in the area, the whole area historically was market garden and it is only repeat development and garden grab applications that have changed the nature. This development commenced in the 1970's. The Reddings does however have a history dating back to 1560 and is not an estate development with its roots in the 1960's/1970's, as the applicant suggests. The development will provide 2 substantial four-bedroomed dwellings with garages. There is no shortage of houses of this type in the area, nor within the Borough. As such, we do not find robust justification here.

12. Although the applicant has considered crossover provisions for 2 estate cars passing, the estate car dimensions used are adopted from 2006. This is not considered typical of current estate cars.

13. In addition to the analysis for 2 estate cars, GCC require consideration of a refuse vehicle and an estate car passing in the entrance. The applicant does not consider this, nor do they provide swept circle analysis for the refuse vehicle turning onto the road, nor do they provide analysis of turning circle for the refuse vehicle once on site, nor do they identify where the bins are to be stored. Requirements for a refuse vehicle access are 5m wide, plus 0.5m clearance either side. The access must also be a minimum of 0.5m from the nearest tree. The refuse vehicle will therefore require a minimum of 6.5m, and the estate car adjacent to it will require a further 2.05m, meaning that the gap in the hedge which the applicant seeks to show as 4.1m will in fact need to be a minimum of 8.55m.

It would not be acceptable or safe for refuse vehicles to be parking on Grovefield Way, and adequate turning provision must be considered and shown on the applicant's drawings and layouts, together with details of bin stores. A 23m swept circle must be shown for the refuse vehicle's right and left turns into the development.

14. The applicant states that the visibility splays can be achieved by trimming the hedge. However, the current hedge overgrows a cycleway and the signage for the roundabout. The tenant does not identify the signage location, which will block the visibility splay. The arboricultural and ecological and planning statement and arboricultural survey and constraints

report all anticipate a low maintenance hedge with light trimming in the autumn. However, there is no detail as to who will be carrying out the trimming, in particular, in respect of the hedge H1, which is owned and maintained at public expense. Hedge H1 contains many fast-growing species. Following cutting-back, the tree/hedge species will rapidly re-grow and when they do, the visibility splay will be compromised within a matter of days/weeks. The owners of the property will not be entitled to cut back the hedge (as they do not own it). The requirement will fall to the Local Authority for maintenance of the hedge at public expense, whilst the applicant will gain significant pecuniary advantage from the development. This is neither equitable, nor fair. The local authority could also be found liable for the cause of any accident because they have failed to adequately maintain the visibility splay. Further, the Wildlife and Countryside Act will prevent trimming of the hedges through the critical growth periods March to August and thus, the visibility will be compromised. The applicant's proposal is not therefore sustainable. The height of the hedge is also such that tower scaffold or similar would be required to maintain the hedges safely, unless a mechanical flail is used. These are likely to be beyond the budget of the domestic owners of the property. Indeed, currently, only the front is trimmed, and the top has not been cut for some time. The design proposal is not therefore in accordance with the Construction Design and Management Regulations 2015 in that it introduces a significant hazard in respect of working at heights to maintain the visibility splay. The cutting of the hedges will also, at least partially, obstruct the cycleway, or the road if a tractor mounted flail is used.

15. Whilst a small area of tactile pavement to warn pedestrians/cyclists has been introduced by the side of the proposed hedge opening, it would not be clear what hazard is being advised, and entry of vehicles out of the site and across the cycleway would not be expected. Pushchairs would be a risk from emerging vehicles. The applicant does not make any clear statements with regard to priority.

16. The applicant does not detail the number of anticipated vehicle movements per day, which may reach 30 or more movements per day, given that parking for 8 cars is being provided.

17. Many residents have recently reported excessive speeds for vehicles travelling south on Grovefield Way, approaching The Reddings roundabout, as vision is now partially obscured by the hedge, which also obscures the signage. The introduction of a new private opening, close to the roundabout, would constitute a "change in road layout" as the many drivers that use Grovefield Way each day, and those that have used the road since 1989, would not be expecting vehicles to stop the traffic to turn right into the development or, to turn left into the development ahead of the roundabout where drivers would be expecting that the vehicle would be indicating to turn at the roundabout.

18. Significant road hazards could result in the event that a delivery vehicle was parked in the hammerhead simultaneously with the arrival of refuse, recycling trucks, or similar. The applicant makes no provision for this in his design.

19. Grovefield way was constructed as the southwest distributor link road. Relevant applications which should be listed in the Related Cases/Constraints tab are :

- CBC 88/01459/KZ - approval of reserved matters - outstanding
- CBC 89/00765/PM - construction of new road
- CBC 89/01826/PF - road layout and drainage
- CBC 92/00919/PF (Alt ref: CB 18844/01) - road section Golden Valley roundabout to B&Q roundabout
- GCC 92/00011/County (cross ref: CB 18844/1) - link road rail bridge
- GCC 92/00012/County (cross ref: 93/8436/0143/FUL) - link road rail bridge.

20. When the southwest distributor road was constructed, there were Highway design statements to the effect that no individual property access would be permitted onto the road, or similar. Indeed, dwellings constructed on North Road East since the time that Grovefield Way was built have a warranty that says that no entrance between North Road East and Grovefield Way will ever be reopened. At the time that permission was granted, there was great emphasis that

Grovefield Way was to be a link road and not a local distributor road. The residents' association has requested access to CBC records. In the interim, planning officers should investigate for themselves. In general, the link road principle has been upheld since 1992 as recent accesses onto Grovefield Way have been in the form of roads serving multi properties such as the Symphony Way housing development and most recently, the Cotswold BMW development (which has had a hugely negative effect upon traffic flows in the area since it opened in August 2017). No individual access has been created, save for the Coldpool Lane playing field which, it could be argued, is more akin to a multi access, and which it can also be argued has not yet been brought into use. The drop kerbs along Grovefield Way (where BMW staff currently park their cars) were for historic access to the farm fields. GCC conceded that these could remain in order to avoid delay in construction of the road. At no time during the conception or construction of the Grovefield Way link road has there been any suggestion that these farm accesses would ever be used for anything other than field access, because the greenbelt was then assessed as being highly valuable as the buffer to Gloucester, and there were no proposals at all to extend the PUA into it; or that access for BMW and the employment site E3 adjacent to it; or for the Symphony Way development; or, for the Coldpool Lane field, would ever be created.

The applicant's Design and Access statement does not suggest to us that there have been any significant discussions with GCC, rather, an in-principle decision has been requested, and the applicant has then not acted upon all of the matters raised. The drawings and reports submitted by the applicant in support of the transport policy are all marked "preliminary". If this application were to be permitted, the applicant would need to revert to the officers/planning committee for an amendment. It is therefore considered to be completely unacceptable to contemplate planning permission approval for the development, with a condition regarding transport, as the proposal by the applicant is completely misleading and he would be unjustly rewarded. At worst, it is misleading because the applicant recognises that approval would not be granted for the access that will actually be required. The hedgerow is much valued in the local character of the area. It was designed to act as a sound attenuation buffer for traffic and to ease pollution. As we have set out, the applicant will require a much larger hole in the hedge than has been indicated. The site is also located at the point where vehicles will be braking on the approach to the roundabout, and accelerating having left the roundabout. There will be considerable noise pollution to many nearby properties if the attenuating effect of the hedge is lost.

This is clearly measurable following the additional noise from the A40 which is now present within The Reddings area following the drastic removal of trees and hedges around the Cotswold BMW site at the bottom of Grovefield Way. Many residents within Leyson Road and along Grovefield Way are now raising significant concern with regard to pollution levels along Grovefield Way as a result of the vast increase in traffic, and in particular, periods of slow moving/stationary traffic from 07:30 to 08:30 and 16:00 to 18:30 hours each weekday. As we have reported, the traffic analysis supporting the application is fatally flawed as it has not been undertaken during a neutral month. Notwithstanding, the applicant has taken no account of the almost certain future increase in traffic flows: along Grovefield Way which will result from the development of the remaining site adjacent to Cotswold BMW (extent outline permission for B1 offices); nor the development of employment site E2 for B1 offices (adjacent to Pure Office/Asda); nor for the 27 houses granted permission adjacent to Asda; nor for the 80 bedroom care home facility being constructed in the former woodland behind Cheltenham Film Studios; nor for the increased traffic which JCS identify will be flowing into the park and ride where the spaces are to be more than doubled to more than a 1000 vehicle capacity; nor does it account for the additional bus traffic servicing the Churchdown housing developments on the Gloucester Cheltenham link; nor does it account for the new school and dwellings to be constructed in Leckhampton which will be accessing via the Grovefield Way "link road". All of this traffic will pass through The Reddings. Similarly, the use of Grovefield Way as a "rat run" to avoid the congested A40 and Hatherley Lane is not accounted for. This will cause significant increase in local pollution (the residents' association are already calling for pollution monitoring at this position on Grovefield Way where acrid fumes linger for many hours of the day and are thought to be breaching, or close to breaching, the national thresholds). With an 8m-10m gap in the hedge for access and significant reduction in the hedge

volume for visibility splays, the fume pollution to the residents of the new properties and to nearby existing residents, will rise significantly, and unacceptably, contrary to policy.

21. TRRA suggest that a headlight path analysis should be carried out to determine the nuisance that will result to neighbours due to the light pollution caused from headlights travelling into and out of the development, as well as the background lighting.

Previous applications

22. The planning history is noted, as is the inspector's report. The applications are now over 16 years old, during this time, local and government policies in respect of garden grabbing, vehicles, pollution, etc have varied significantly, and there has been a great deal of very local commercial and residential development. The applicant seeks to avoid the Emerging Local Plan by arguing that it is at the consultation stage and too early to give any weight to it. The Local Plan was most recently advised as being the final consultation ahead of submission to the inspector circa August 2018, having undertaken 3 prior consultations over a number of years. The Local Plan is considered to be a much better guide to emerging policy than retained policies CP4 and CP7. Notwithstanding, CP4 states that permission should not be granted where it will cause harm to adjoining landowners, or if it causes traffic to reach environmentally unacceptable levels. TRRA consider that the proposal breaches CP4 as the removal of the hedge to create an access for the 2 dwellings will have profound implications for many local dwellings in removing the designed sound and pollution baffle associated with the link road permission. The access will benefit only 2 dwellings. The Local Plan advises that the current 5 year housing land supply is robust. Once again, we can find no robust reason to permit a development of 2 houses, when it will have a significant negative impact on many more local dwellings and their amenity through noise and fume pollution, whilst to the much wider area, the additional disruption that it will cause to traffic will have a significant negative effect, particularly in respect of deliveries to the new dwellings from supermarkets, online retailers, post and refuse and recycling collections in being undertaken, as well as during the construction period when heavy plant will need to access and leave the site.

23. The site is not considered sustainable, as the adverse impacts will significantly and demonstrably outweigh any benefits for these 2 houses, when assessed against the policies of the NPPF as a whole.

24. Whilst the NPPF requires the planning authority to look for solutions, applications and appeals for vehicular access off The Reddings has already been discounted. That leaves only the possibility of access off Grovefield Way and this is contrary to its designation as a link road, where harm caused will outweigh the benefit. This application and other access points must fail because it is not sustainable or safe.

25. The NPPF requires refusal where the residual effects on traffic will be severe. This proposal is contrary to paragraph 32 which specifically requires safe and sustainable access for all.

26. The application is not in accordance with section 7 of the NPPF and does not contribute positively to making the area better for people. Rather, it will place a further strain on an already strained transport infrastructure, foul and storm water drainage infrastructure, health infrastructure (there are no doctors or dental surgeries, or similar within The Reddings area). We note that in previous applications there was mention of the applicant being willing to negotiate section 106/CIL levies for playing areas etc, but these are not repeated within this application. As such, the application does not in any way contribute positively to making the places better for people. However, it will significantly disrupt the local scene by introducing a gap into a hedge which is almost continuous from The Reddings roundabout down to the park and ride roundabout/B&Q, save for a gap on North Road East.

27. There are no precedents to break the hedge in the visual street scene to provide access for two properties.
28. The application is contrary to NPPF paragraph 53 in relation to garden grab. The paragraph states that local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens where development would harm the local area. The Emerging Local Plan makes it clear that the proposal cannot be approved.
29. The landscaping sensitivity is high. Development will "cause harm to the architectural integrity, townscape and environmental quality of the area by eroding open space around the existing buildings" contrary to the JCS criteria set out in SD4B and SD4C.
30. No consultations have been made with regard to biodiversity and geodiversity. However, neighbours identify bats, sparrows and buntings as protected species. The site is clearly in use by hedgehogs. This was proven recently, as a hedgehog was run over opposite the proposed entrance to the site on 3 May 2018 (photographic evidence available).
31. The application of previous policies to the application is not equitable. The applications in 2002 and the inspector's rulings cannot be considered as relevant because, since that time, close to the site, Cotswold BMW, B&Q, Pets at Home, Home Bargains, the Nuffield Hospital, Symphony Way housing estate, Asda, Pure Officers, Harvester, KFC and Travelodge have all been built. Presently, there is a large care home under construction, site E3 on Grovefield Way (over 4 acres of employment land) and E2 on Hatherley Lane for B1 offices and a further 27 houses have also been granted permission and/or are under construction.
32. The proposal is contrary to Emerging Local Plan policy D3 because it removes open private space that makes a significant contribution to environmental quality. The trees that are proposed to be removed have a minimum 10 years life expectancy by the applicant's own analysis.
33. The project does not enhance ecology, landscape or biodiversity in any sense; it simply provides a significantly reduced environment to that which presently exists. Proper consultation and surveys are required. The application proposes felling large areas of hedge and subsequent trimming and maintenance of a hedge that is not under the ownership or control of the applicant, for the benefit of the two private dwellings and the pecuniary gain of the applicant. Such maintenance would be at public expense if the project is allowed, and is not acceptable.
34. The application does not meet the requirements of INF1 of the JCS.
35. The contribution to the economy is negligible. The cost to the public purse of maintaining the crossover and the hedges and the loss to the environment and local character is far more significant.
36. The applicant assesses the hedgerows as being in accordance with the DEFRA 2007 criteria to be listed as "habitat of principle importance for the purpose of conserving biodiversity in England" section 41 of the NERC Act 2006. A much greater portion of the hedge than the applicant shows will need to be removed in order to comply with the requirement for an estate car and refuse vehicle to cross and to keep treelines and hedge lines out of the visibility splays.
37. The applicant does not show the views from Grovefield Way of the continuous hedge and the significant biodiversity that it affords as an intact hedgerow in his submission. Rather, the view is only included from within the applicant's garden. It is also noted that applicant's hedges H2 and H3 are also listed as intact hedgerows which are species-rich and also compliant with the DEFRA 2007 "criteria to be habitat of principle importance".
38. Policy G12 requires preservation of trees and not to allow them to be felled simply for relatively low value development purposes.

39. Policy G13 states that development causing harm to trees will not be permitted. This application will cause very significant harm to multiple trees.

40. It is of great concern to us that the applicant, Arlo Homes, state on their website that they are looking for "large rear or side gardens" and "corner plots". The nature of the developer's business is clear and seems to have little or no regard to the appropriateness of such a development or the environmental or aesthetic impact it would have on a community. The granting of such an approval will encourage, and reward, such thinking and set further precedents for inappropriate development in The Reddings area.

41. For all of the reasons listed above, the application must be refused.

Comments: 24th May 2018

The Reddings Residents' Association reply to GCC Highways comments on application:

We have reviewed the comments by the Highways Planning Liaison Officer dated Thursday 17 May 2018. Regrettably, the comments are factually incorrect.

1. The speed limit is 40mph, not 30mph as the Planning Liaison Officer states. A small section close to the roundabout with "The Reddings" is 30mph, but the position where the application proposes to make a junction with Grovefield Way is well within the 40mph limit. This is easily verified by a site visit, or google street view where speed signs can be clearly seen.

2. Along Grovefield Way there are just three openings: The Reddings, The BMW site and the Symphony Way housing development. A few yards beyond the entrance to Symphony Way, the road becomes "Coldpool Lane". Grovefield Way therefore only has two access junctions serving large developments, and an historic junction with The Reddings (which pre-existed Grovefield Way by hundreds of years). The other "redundant" minor accesses are for farmers fields (now used as parking for BMW staff). Historically, these were permitted in order to gain permission for the South West Distributor link road with the applications that we have listed from 1988 to 1992 when it was constructed with a warranty saying that no entrance would ever be reopened between North Road East and Grovefield Way and with great emphasis that it was to be a link road, and not a local distributor road (see item 19 on our objection dated 8 May 2018).

3. GCC Highways/CBC Planning Department need to refer to the relevant applications listed in item 19 of our objection dated 8 May 2018 and the conditions that were placed upon them and advise when and how the status of the road has been altered. GCC/CBC reference to supporting documents that do not support what we have set out would be welcome.

4. On the Coldpool Lane section of the link road, there are two historic entrances to residential properties that pre-date the construction of the link road by many years. These are within the 30mph section of the link road as it approaches the junction with Up Hatherley Way. One entrance has a chevronned, right turn filter lane; the second entrance (where the road narrows) still has a chevron separator for traffic. A more recent junction was made for the playing fields (still to be brought into use) that was constructed to replace those lost to the Symphony Way housing estate. Once again, there is a right turn lane refuge, it is within the 30mph section and, there is a pelican crossing immediately before the junction. This is easily verified on a site visit or google street view. We are not aware that highway design criteria has changed since 1992, so why are double standards being applied for this application compared to those on Coldpool Lane?

5. As set out above, there are no precedence for a private access serving small residential development on Grovefield Way and none whatsoever along the length of the link road for a junction to be formed into a small residential development in the 40mph section, close to the roundabout.

6. GCC Highways do not note the large direction signage adjacent the proposed site entrance on the approach to the roundabout, which will obscure the visibility from the proposed junction /access and prevent a viable visibility splay being formed.

7. GCC do not note that the hedge (which was an integral part of the 1988/1992 permissions for the link road), is not in fact within the ownership of the applicant. It most likely belongs to them and they will be responsible for maintaining the visibility splay out of public funds. Why?

8. GCC Highways do not address the point that the traffic survey has been undertaken during a non-neutral month (see point 10 of our objection 8 May 2018 below).

9. GCC confirm that the proposed access, as drawn, is sub-standard, ie, it is not factually correct. It is very clear within the planning regulations that drawings submitted must be accurate and to scale. The drawings are neither, and the application should not have been validated.

10. We suggest that it would be unreasonable for the proposed condition to be attached to an approval. Not least of all because it is simply not possible to create an adequate visibility splay through a hedge that neither the applicant, nor the future owners of the proposed houses will own, and which they will be unable to maintain. This is because the seasonal hedge growth will restrict the visibility splay. The height and positioning of the hedge will be beyond the scope that a normal domestic resident could safely maintain (in accordance with the Construction Design and Management Regulations 2015), even if the hedge owners were to grant permission. Notwithstanding, in order to maintain visibility splays, and conserve the safety of those entering and exiting the site, the hedge will require constant trimming through the summer period. This would contravene the Countryside and Wildlife Act because wildlife and birds will need the habitat to be undisturbed (see our point 14 - objection dated 8 May 2018 below).

11. Swept vehicle analyses and turning circles for vehicles within the development and entering and leaving the development must be properly designed and drawn - the applicant submits only preliminary drawings and no designs. The GCC Highways Officer's contention that the pre-application advice issues have been addressed is patently wrong because drawing 01 is substandard in width and because any discussion of 85th percentile speeds on the highway are entirely invalid, because the data has not been collected in a neutral month.

12. GCC Highways do not address the residents' concerns over the significant potential introduced by this opening to users of the "Important National Cycleway" and the footpath, particularly pushchairs. This section of cycle path is regularly used by families and those joining the Sustrans Cycle Network route 41 (approximately 500 yards from this proposed entrance) which connects Bristol, Gloucester, Stratford-Upon-Avon and Rugby. With such a large amount of money and time being spent on improving the cycle provisions in this area, we are astonished that permission is being sought to allow vehicle access to cross it. It is simply inadequate to suggest that a condition should be placed on the applicant, when those conditions are rarely enforced by CBC. We would be interested to know the level of enforcement that would be applied by CBC or GCC were the condition to be ignored (because it is foreseeable). The issue of conditions can be avoided by making the applicant carry out detailed design and drawings to satisfy all of the design criteria now, so that there can be absolute certainty about what is to be constructed and how it is to be maintained and by whom. The safety is made all the more pertinent by the serious vehicle/cyclist collision on the Cold Pool Lane section of link road, 2 days ago.

13. The question of why it should then be maintained at public expense in order to service two private dwellings also needs to be answered by GCC/CBC/the applicant/developer.

14. We can only wonder why GCC Highways are stating the number of vehicle movements on the site and not the applicant. Notwithstanding, the former applications on the site in 2003 included for 5 dwellings, with an assessed 50 vehicle movements per day. These properties had two parking spaces each. This equates to 5 vehicle movements per day, per parking space. The

proposed properties have 4 parking spaces each, making a total of 20 vehicle movements per property, per day, or a total of 40 vehicle movements for both properties per day. The properties are 4 bed roomed and it is quite likely that 4 vehicles will be attributable to each property and there is no on-road parking nearby. In addition, supermarket and courier/postal deliveries will also be being made, as well as recycling and refuse collections. GCC Highway's suggestion of 10 vehicle movements per day is considered fanciful.

15. We maintain that the drawings are inaccurate and the design is not adequately developed to be able to satisfy the highway conditions in the pre-application advice. As such, the advice from the Highways "Technician" is simply wrong and no credence should be given to it. We are at a loss to know why GCC Highways appear to be trying to do the developer's job for them.

16. Notwithstanding the technical arguments, the application should not have been validated at all because the drawings and designs are marked preliminary, are inaccurate, and because the applicant has not served notice on adjoining landowners who would be affected, principally, the owners of the hedge at the edge of the highway which has a specific design purpose to act as a noise and pollution barrier to residents. The hedge is an ecology haven and yet no ecology reports have been called for in the consultation. Why? The public consultation is also flawed inasmuch as public notices have not been posted.

17. Otherwise we repeat verbatim points 1-41 in our objection of 8 May 2018. These take a forensic and detailed review of the merits of the application, and should not be dismissed as "NIMBY". If these points can be adequately addressed by CBC and GCC Highways and by proper designs and submissions by the applicant, we would be pleased to review them and comment/support them. In the interim, we maintain that this application is neither valid nor credible, and must be rejected.

Badgeworth Manor
Badgeworth
Cheltenham
GL51 4UL

Comments: 26th April 2018

I would like to register my support for this application.

There is a growing need for new homes throughout the UK which has been widely advertised by the Government and I cannot see any reason why this development should not be brought forward.

The previous application was rejected on the grounds of access, mainly due to safety concerns from The Redding's. The applicant has addressed this matter and provided the necessary evidence within their Transport Statement to display that a new access from Grovefield Way is both suitable and safe.

Looking at the supporting documentation this area of the site is currently used to house livestock, which is not wholly suitable in a residential area and would be better suited for use as a development site.

Hamilton
The Reddings
Cheltenham
GL51 6RY

Comments: 22nd May 2018

I won't repeat the many valid reasons stated by The Reddings Residents Association and others. With an inaccurate highways report, a misleading plan, and an overall approach that goes against many of the local plans and historical principles, I object to the application.

27 Chalford Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6UF

Comments: 11th June 2018

I object strongly to the new access to these houses being created on to Grovefield Way. There is a 40 mile an hour speed limit and any access would be too close to an already busy roundabout. Cars approach this roundabout at high speed, often greater than 40, so pulling out would be impossible, and not safe. I do not see why access cannot be given through the current driveway being expanded and the plans being redrawn.

It also sets a precedent along this road. There is no other access to housing within the North Road East area for a good reason. Safety.

Coppalex
North Road East
The Reddings Cheltenham
Gloucestershire
GL51 6RE

Comments: 7th May 2018

Objection is made for the following reasons:

Providing access to the new development onto Grovefield Way is of great concern. Traffic travels at excessive speeds (try crossing near the roundabout on foot as I do) and there is very limited visibility when entering and leaving the roundabout. At peak time traffic is at a standstill. How will the residents be able to make a right turn out of the development without either blocking the shared foot/cycle path or the oncoming traffic.

There doesn't appear to be enough space in the development to allow the weekly refuse/recycling/food and garden waste vehicles to enter and exit safely. Will these vehicles pull up onto the foot/cycle path making it dangerous for users of the pathway and will the residents be leaving their bins etc on Grovefield Way? There is always a lot of waste on the roadside following recycling day, this will only add to the amount of rubbish that accumulates along Grovefield Way.

Cars are now parked daily in any available pull in/bus stop along Grovefield Way. Any new development along this road may encourage further thoughtless parking.

Destroying the hedgerow to allow two houses to be built will have an impact on local wildlife which has already been significantly impacted by the BMW development.

According to the JCS and the local plan the housing supply is sufficient through to 2031 so there is no requirement for additional housing and certainly not of the four bedrooms and double garages variety.

Springfield
The Reddings
Cheltenham
Gloucestershire
GL51 6RY

Comments: 8th May 2018

I object to the application for the two dwellings for the following reasons.

An entrance onto the Grovefield Way will be required. The Road is a 40mph speed limit and as such, right turns out of the property would be extremely difficult and indeed dangerous.

Grovefield Way, when constructed, was covenanted to not have any entrances onto it, which is why North Road East is a cul-de-sac.

The NPPF takes a very dim view of garden grab development. That is what this application seeks to do. The JCS has already identified sites to fulfil housing needs until 2031. The houses in this application are therefore not needed, they are purely to make money for the developer. The grant permission will make a mockery of the JCS.

Allowing access onto Grovefield Way would create a precedent which developers would then be able to use when applying for permission to build on the greenbelt area of Chestnut Farm opposite this site. Developers are already expressing an interest in building on it.

The proposed entrance to the site passes over a cycle path. As Grovefield Way is an extremely busy road, any car waiting to exit these two houses would, of necessity, have to block that cycle path for a considerable period of time waiting a break in traffic.

Where are bin and delivery lorries supposed to stop/park?

In order to create entrances, it would be necessary to fell a significant length of mature hedgerow to facilitate access to the site. As can be seen in the applicant's own biodiversity report, this hedgerow is a "habitat of principal importance for the purpose of conserving biodiversity in England". Recent successful planning applications have seen the decimation of wildlife habitats in The Reddings. Within the last few years, it has seen, the development of 250 houses near Coldpool Lane, the destruction of ancient woodland at Arle Court Manor, the new bus lane, Cotswold BMW being built in greenbelt and its shameless felling of hedgerow and mature trees (including a protected oak). Local wildlife is in desperate trouble and every inch of natural habitat is vital to try to salvage some of it.

Of my reading, the hedgerow that the applicant proposes to cut down doesn't even belong to them! This is an amenity that was provided for the benefit of all of the residents of The Reddings to act as a noise buffer when the Grovefield Way link road was built. It's astonishing that anyone would think it acceptable to make a large gap in this precious hedgerow just to build 2 houses.

The report talks of new hedgerow being planted. We already know from the woeful lack of action to control BMW staff parking that such items are merely wishes and aren't enforceable. As such, it certainly cannot be assumed that there will be anything nearly as valuable planted in it's place.

Hopefully the planning department will not allow this nonsense of an application to proceed any further, and that commonsense will prevail.

7 Chalford Avenue
The Reddings
Cheltenham
Gloucestershire
GL51 6UF

Comments: 4th May 2018

I object to this application for the following reasons.

1. No planning Application advisory notice is being displayed at the subject site. I believe that this is therefore not in line with the appropriate process/procedure.
2. If I remember correctly there was a similar application in 2002 that was rejected because of the access of Grovefield Way and a worry about safety. I cannot see that anything has changed to address this.
3. I feel concerned that a driveway would be allowed to access Grovefield Way. I have always understood that Grovefield Way was the "south west relief road for Cheltenham" and therefore would not be subjected to any additional junctions. When it was built North Road East was sealed off. I feel that having a driveway here would be unsafe and goes against the reason d'etre of Grovefield Way. My safety concern relates to a driveway being on a busy 40 mph road, near a roundabout and cutting across a cycle path.
4. The required removal of the hedgerow to allow the suggested access will have an impact on local wildlife which has already been significantly impacted by another local but major development (BMW). The street scene along Grovefield Way would be significantly impacted by a break in a continuous hedgerow from the nearby roundabout to the B&Q development except for a small gap to allow pedestrian access to North Road East. In 1995 the reason d'etre for the hedgerow was to provide a buffer zone between the road and the new housing estates.

March House
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 8th May 2018

I have read and support the other objections to this proposal. In particular, I object in the strongest possible terms to the proposed vehicle access on to Grovefield Way. Other objectors have pointed out the COMPLETE FOLLY of this proposed access onto a busy road with a 40mph speed limit so close to a roundabout.

In addition:

Approval of this access would set a precedent for other potential developers with land adjacent to Grovefield Way. This road already carries a large volume of traffic, with long queues and consequent delays at peak periods. We should not be adding to this problem with unplanned developments of this sort.

The application makes no mention of how contractors vehicles will access the site during the construction process. If this is from Grovefield Way, the consequent disruption would be unacceptable.

For these reasons alone this application should be rejected.

Comments: 22nd June 2018

Blenheim Villa already has vehicular access to The Reddings. There is plenty of room between Blenheim Villa and the eastern boundary of the property.

If the owner really wants to build two house in his back garden, I can see no reason why access to them should not be via an extension to the existing driveway.

Therefore the proposed access from Grovefield Way (and all the grossly detrimental side affects) is entirely unnecessary,

The Hedgerows
The Reddings
Cheltenham
Gloucestershire
GL51 6RL

Comments: 8th May 2018

I object to the proposal for the following reasons:

1) There are very serious safety issues with the proposed location of the vehicular access to the site. An access intended to serve two very sizeable family houses yet located on a very busy 40 mph distributor road, positioned adjacent to a roundabout and traversing a well-used cycle path.

Furthermore, there does not appear to be sufficient provision for the accommodation of refuse bin and re-cycling lorries and other service vehicles delivering to/collecting from the site, which represents a further serious safety issue in this location.

2) The development of this garden land with the consequent loss of yet more valuable green space, trees and hedgerows would be detrimental to wildlife, the environment and to the character of the location.

5 Springfield Close
The Reddings
Cheltenham
Gloucestershire
GL51 6SE

Comments: 4th May 2018

I have only just been made aware of this planning application. I walked by the site and did not see any public information notice.

Safety is a major concern. The siting of the entrance for the proposed houses seems very close to the roundabout. The road curves and unless most of the hedgerow is removed, visibility would seem to be an issue. The speed limit is 40mph and this is busy road, which until BMW was built, did not have any "breaks" apart from long established junctions with side roads.

The disruption to the cycle path is undesirable.

If the property owner wants the development to go ahead, perhaps they would be willing to lose land to the side of Blenheim Villa to allow access onto Th Reddings, rather than disturb the traffic flow on Grovefield Way.

The hedges are full of life and the loss of habitat would be detrimental as well as removing a buffer zone for neighbouring houses.

If this proposal is passed, then it seems likely that applications from nearby similarly positioned sites would follow, with the same safety issues.

4 Shakespeare Cottage
North Road West
The Reddings
Cheltenham
Gloucestershire
GL51 6RF

Comments: 7th May 2018

We wish to object to this application for the following reasons:

1. This application should not have been validated - the application site indicated by the red line does not include land where works are required to achieve the visibility splays indicated in the Highways Technical Note. This land should be included in the application and a notice served upon the owner (presumably GCC Highways). At present it gives a false impression of the works required.

2. A site notice has not been displayed. This application is of sufficient wider interest to require one.

3. The design of the proposed dwellings is of insufficient quality to justify the loss of Local Green Space and therefore against policy.

4. Highways issues:

- The visibility splays shown cannot be achieved without significant cutting of existing hedgerow and removal of a large traffic sign. The drawings do not accurately reflect the current situation where hedgerow steps out and covers half of the shared cyclepath as you approach the roundabout.

- The creation of a junction so close to The Reddings roundabout is dangerous and would be an aberration on Grovefield Way and contrary to the intention of the road when it was built as a link road i.e. there are no private dwelling accesses off it.

- It is not clear who will have to give way where the proposed access crosses the cyclepath. It appears as though exiting cars will have to make a two stage departure but it is still likely that cars will end up straddling the cyclepath at times. Users of the cyclepath will not be expecting a junction of this nature.

- Cars exiting the roundabout towards Arle Court have the possibility of being faced immediately with stationary vehicles waiting to turn right into the new properties.

5. All but one tree appears to be proposed to be removed from the site with limited new planting. Hedgerow will have to be severely cut as above and this would represent an unacceptable puncturing of the green buffer zone along Grovefield Way.

Comments: 21st May 2018

The latest GCC Highways are factually incorrect and state the road has a 30mph limit when it is in fact 40mph.

They suggest unachievable and unenforceable conditions regarding visibility splays and appear to be written by someone looking to apply standard sentences from their manual without any knowledge of the site and locality.

No mention of a Section 278 agreement?

No comment on the ownership of the land where alterations are required to achieve the visibility splays.

Given the significant loss of hedgerow required why has the Biodiversity Officer not been consulted?