

APPLICATION NO: 22/01891/FUL		OFFICER: Mr Ben Warren
DATE REGISTERED: 1st November 2022		DATE OF EXPIRY : 13th December 2022
WARD: St Marks		PARISH:
APPLICANT:	Mr John McCreadie	
LOCATION:	Playing Field Adj 10 Stone Crescent Cheltenham	
PROPOSAL:	Construction of 6 semi-detached dwellings	

REPRESENTATIONS

Number of contributors	9
Number of objections	9
Number of representations	0
Number of supporting	0

15 Wharfdale Square
Cheltenham
Gloucestershire
GL51 8DL

Comments: 14th June 2023

All of my previous comments related to Health and Safety, increased traffic flow, limited parking, flood risks, impact on wildlife, etc. still apply. Please ensure you take them into consideration prior to making a decision on this Planning Application. In its current form the proposed new development will have a significant detrimental impact on the local area and its residents. This is the reason why the existing estate has been in place since 2001 and the land for the proposed new development has never been built upon. It is also the reason why you have so many objections raised against this current Planning Application and the others mentioned in the previous paragraph for the adjacent piece of land. This current Planning Application should really go to the Planning Committee for approval.

Comments: 23rd June 2023

There are quite a few reasons why the Planning Application should not be approved. As a resident of the area who was NOT consulted directly via a notification letter, I feel I am best placed to know the problems and issues that the proposed new development will cause to the area and local residents. My concerns / points about this particular Planning Application are as follows:

* I would expect all Objections raised against previous Planning Applications 14/01276/OUT, 17/00407/FUL, 18/01661/FUL and 18/02215/FUL to also be considered relevant to this current Planning Application, as they all use the same access point (i.e., the site in question is directly adjacent to the site which was covered by the aforementioned Planning Applications).

* The following articles are also pertinent, and I will be getting in touch with the press to make them aware of this new Planning Application:

- <https://www.gloucestershirelive.co.uk/news/cheltenham-news/fears-plans-homes-near-cheltenham-1148653>
- <https://www.gloucestershirelive.co.uk/news/cheltenham-news/plans-new-housing-estate-could-1472592>

* There is a clear imbalance and discrepancy between the number of residents that were informed about the previous development versus the number that have been aware this time around. Residents of Wharfdale Square, Stone Bank and Lucinia Mews should also have been informed about this planning application. Due to there being only a single entry / exit point to the proposed new development I would have expected at least 60 residents to have been provided with letters of notification. Only 11 letters of notification were sent out to residents of Stone Crescent. The Planning Office were pulled up on this previously by me, admitted fault and thereafter sent additional letters out. This has not been the case this time around and as such I have a Stage 2 Complaint in progress, which will likely have to progress to the Local Government Ombudsman, unless CBC do the right thing.

* There will be an increase in traffic and congestion to / from the area, which is already overburdened. This is both during the development phase and once the houses have been built. According to the plans the proposed new development may only be for 6 houses, but 13 houses have already been approved under previous planning applications (mentioned above). Residents of Wharfdale Square, Lucinia Mews, Stone Crescent and South Bank will be heavily impacted by this increase in traffic, as there is only a single entry / exit point to the area. Construction traffic would have to access the site via Wharfdale Square and Stone Crescent. Construction traffic may not be able to negotiate / manoeuvre these tight turns safely when there are cars parked on both sides of the road. The existing road on Stone Crescent via Wharfdale Square was not designed to sustain such a large, potential increase in traffic flow. There have already been instances of vehicles belonging to existing residents being damaged by HGVs passing through the square. HGVs are required to reverse into Stone Crescent rather than drive straight in. Come and see this for yourselves if you don't believe me (Tuesday mornings are the best)! It's worth noting that New Dawn Homes (NDH) did some work on their existing site (18/02215/FUL) last year and had issues getting their HGVs into and out of the square. Refuse collectors also have issues and regularly have to ask people to move their cars. Only last year their negligent driving caused them to reverse into my car, which ended up getting written off (they admitted guilt and I did receive a payout after a few months of wasted effort chasing on my part). The point I'm trying to make here is that the local block paved roads are not geared up to handle HGVs and the additional traffic. This area has been established and maturing for over 22 years now. Residents should not have to tolerate this additional upheaval!

* There will be severe disruptions to the lives of existing residents. At present when cars are parked outside their own properties it is difficult if not impossible for 2 moving cars travelling in opposite directions to pass one another, as the roads are very narrow. There is no mention of the number of vehicular trips the site will generate, and a trip generation exercise has not been undertaken.

* According to the plans the proposed new development will be for 6 houses / 18 bedrooms. However according to the Revised proposed site layout plan, there are only 11 parking spaces allocated to these houses. This is clearly not enough and such residents of these new houses will impeach on existing parking.

* We have one narrow entrance roadway into the area with cars permanently parked down one side of it which is a nightmare normally when entering and exiting the square. This means only one vehicle can travel up or down the road at a time. How will this work for large lorries and building works vehicles on what is essentially a one-way access to the area? Then there is the added issue of how the block paved road itself will cope with the additional heavily laden lorries and diggers, etc. Has anyone visited the square at peak times (i.e., school drop off / pick up times) to see the issues that we currently experience? Probably not....

* There will be a reduction in the amount of parking available in the area. Parking is already at a premium in the area. Construction vehicles parked in the existing estate will further exacerbate this problem. If contractors' and site workers' vehicles were to park in the existing development during construction, they would quickly swamp and block the existing development. This would be unacceptable for current residents. Construction traffic must not be allowed to park on the existing development if this Planning Application is approved. During school start and finish times cars are parked alongside the entrance to the square and all around it. Access is impeded by parents dropping off and collecting children from Rowanfield Infant and Junior schools and using the square as a car park. There are a lot of cars parked illegally around this time, which has been highlighted to CBC and our local Councillor in the past, but they have chosen to ignore this fact, as it would involve them doing something about it and earning their keep! The entrance road is often double parked during these times, making passage even more difficult and dangerous. This will make it difficult for construction vehicles to enter / exit the site. An average of 1.83 cars has been allocated per house in the proposed new development. This will increase exponentially if the dwellings are Houses in Multiple Occupation (HMO), which a high quantity of the existing houses in the area already are. What are CBCs parking guidelines - specifically what is the minimum level of car parking that proposed new developments should offer, according to its size? I do not believe that the proposed new development provides sufficient parking space to meet these requirements. The proposed development is likely to generate a significant increase in the amount of local traffic and as such any loss of on-road parking could mean the loss of a valuable residential amenity.

* With the proposed new development there will be a loss of existing parking spaces at the end of Stone Crescent that are in regular use. Where will these cars park? You should visit Stone Crescent in the evening and see all of the parked cars you will be displacing if this Planning Application is approved.

* Annex 5 Manual for Gloucestershire Streets (4th Edition) 2016 - "Developers are encouraged to calculate the parking demand that would be generated by the proposed development using the methodology set out in the NPPF and submit this evidence with the planning application. 2011 Census data in respect of car ownership is available for super output areas and this should be the starting point for determining likely car ownership levels for your development". No justification for parking standards based on census data has been provided in the Planning Design and Access Statement.

* No assessment of the site's accessibility and opportunities for sustainable travel have been undertaken. It is necessary to identify what local services and amenities are located in proximity to the site, and also what alternative sustainable travel opportunities are present to enable future residents and visitors to choose sustainable alternatives i.e., walking, cycling and public transport facilities in proximity to the site.

* Please take the time to visit the local area at the pertinent times (e.g., school start times, school end times, in the evening when people have returned from work, when the refuse collections are taking place, etc.) prior to making a decision about the Planning Application. This clearly has not happened up to now or you wouldn't even be considering this Planning Application.

* I would expect the NDH literature (Design and Access Statement) to be updated for the following reasons:

- to accurately images of the parking situation, as the image shown on Page 3 was clearly taken at a time of day when there is plenty of available parking (i.e., people are at work). This image has also been stretched (i.e., doctored deliberately?) by the document creator to mislead the Planning Office into thinking that Stone Crescent is a lot wider than it actually is.
- to accurately reflect the number of houses that are being proposed. Says 7 when the application is for 6 houses.
- to accurately reflect the number of garages and parking spaces being made available.

A decision must not be based on the inaccurate / incorrect representation of the current situation, which NDH has provided in their literature.

* See the image provided in the objection letter provided by 6 Stone Crescent (Planning Application 17/02460/FUL) for an accurate representation of the parking situation in Stone Crescent. Also see the images in Gloucestershire Live (<https://www.gloucestershirelive.co.uk/news/cheltenham-news/fears-plans-homes-near-cheltenham-1148653> and <https://www.gloucestershirelive.co.uk/news/cheltenham-news/plans-new-housing-estate-could-1472592>) for an accurate representation of the parking situation at school pick up time. Against Planning Application 18/01661/FUL, I supplied Michelle Payne (previous Planning Officer) with a document which provides an accurate representation of the parking situation on Stone Crescent and in the local area. The provided document should be taken into consideration when making the decision about this current Planning Application and was uploaded on 31/08/2018 if you want to see it for yourself.

* The NDH literature (Design and Access Statement) states - "3.1 - Paragraph 14 of the NPPF is clear that for decision taking, the presumption in favour of sustainable development means approving development proposals that accord with the development plan without delay". However Paragraph 13 of the NPPF states - "The National Planning Policy Framework constitutes guidance for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications." Guidance is defined as "advice or information aimed at resolving a problem or difficulty, especially as given by someone in authority." As such it may or may not be followed dependent on external factors. What the NDH literature (Design and Access Statement) does not state is that "where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless: - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or - specific policies in this Framework indicate development should be restricted." As such, due care and consideration should be taken prior to making a decision about the Planning Application. This means not making a rash decision without knowing the full facts as the NDH literature (Design and Access Statement) seems to be intimating that approval is a foregone conclusion.

* The Construction Method Statement is not on the Website against the Planning Application. Please make this statement publicly available and provide details of who to contact / escalate this to if NDH does not meet its obligations under the provided Construction Method Statement if this Planning Application is approved. My understanding of this is as follows - ""No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall:

- i. specify the type and number of vehicles;
 - ii. provide for the parking of vehicles of site operatives and visitors;
 - iii. provide for the loading and unloading of plant and materials;
 - iv. provide for the storage of plant and materials used in constructing the development;
 - v. provide for wheel washing facilities;
 - vi. specify the intended hours of construction operations;
 - vii. measures to control the emission of dust and dirt during construction
- Reason: To reduce the potential impact on the public highway."

* Children can regularly be seen playing around the area throughout the day and there are also children walking to / from the school during school pick up and drop off times. This poses a health and safety issue, as during the development phase and post the development phase traffic flow will increase significantly, which also increases the chances of a traffic related incident / accident occurring. Pedestrian safety is imperative! No assessment has been made of the local highway network in terms of reviewing personal injury collisions in proximity to the site, etc. Note that there are no designated footpaths / pavements in Wharfdale Square, so individuals (adults and children alike) are regularly seen walking on the roads as there is no alternative due to existing residents park outside their houses (i.e., effectively the pavement). Residents of the local area have over the years become aware of this and drive accordingly but there are still several 'near misses' in the area.

* The Joint Core Strategy (JCS) is a partnership between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council. The link is here - <https://www.gloucester.gov.uk/media/5441/jcs.pdf>. At a minimum I would expect the following Policies to be met in this Planning Application - SD4 and INF1. Please articulate where and how you are not meeting them?

Policy SD4: Design Requirements

1. Where appropriate, proposals for development - which may be required to be accompanied by a masterplan and design brief - will need to clearly demonstrate how the following principles have been incorporated:

- i. Context, Character and Sense of Place; New development should respond positively to, and respect the character of, the site and its surroundings, enhancing local distinctiveness, and addressing the urban structure and grain of the locality in terms of street pattern, layout, mass and form. It should be of a scale, type, density and materials appropriate to the site and its setting. Design should establish a strong sense of place using streetscapes and buildings to create attractive and comfortable places to live, and having appropriate regard to the historic environment.
- ii. Legibility and Identity; New development should create clear and logical layouts that create and contribute to a strong and distinctive identity and which are easy to

understand and navigate. This should be achieved through a well-structured and defined public realm, with a clear relationship between uses, buildings, routes and spaces, and through the appropriate use of vistas, landmarks and focal points.

iii. Amenity and space; New development should enhance comfort, convenience and enjoyment through assessment of the opportunities for light, privacy and external space, and the avoidance or mitigation of potential disturbances, including visual intrusion, noise, smell and pollution.

iv. Public realm and landscape; New development should ensure that the design of landscaped areas, open space and public realm are of high quality, provide a clear structure and constitute an integral and cohesive element within the design. The contribution of public realm designs, at all scales, to facilitate the preferential use of sustainable transport modes should be maximised.

v. Safety and security; New development should be designed to contribute to safe communities including reducing the risk of fire, conflicts between traffic and cyclists or pedestrians, and the likelihood and fear of crime.

vi. Inclusiveness and adaptability; New development should provide access for all potential users, including people with disabilities, to buildings, spaces and the transport network, to ensure the highest standards of inclusive design. Development should also be designed to be adaptable to changing economic, social and environmental requirements.

vii. Movement and connectivity; New development should be designed to integrate, where appropriate, with existing development, and prioritise movement by sustainable transport modes, both through the application of legible connections to the wider movement network, and assessment of the hierarchy of transport modes set out in Table SD4a below. It should: - Be well integrated with the movement network within and beyond the development itself - Provide safe and legible connections to the existing walking, cycling and public transport networks; - Ensure accessibility to local services for pedestrians and cyclists and those using public transport - Ensure links to green infrastructure; - Incorporate, where feasible, facilities for charging plug-in and other ultra-low emission vehicles; - Be fully consistent with guidance, including that relating to parking provision, set out in the Manual for Gloucestershire Streets and other relevant guidance documents in force at the time.

2. Detailed requirements of masterplans and design briefs, should the Local Planning Authority consider they are required to accompany proposals, are set out in Table SD4d. These requirements are not exhaustive.

Policy INF1: Transport Network

1. Developers should provide safe and accessible connections to the transport network to enable travel choice for residents and commuters. All proposals should ensure that:

2. Planning permission will be granted only where the impact of development is not considered to be severe. Where severe impacts that are attributable to the development are considered likely, including as a consequence of cumulative impacts, they must be mitigated to the satisfaction of the Local Planning Authority in consultation with the Highway Authorities and in line with the Local Transport Plan.

3. Developers will be required to assess the impact of proposals on the transport network through a Transport Assessment. The assessment will demonstrate the impact, including cumulative impacts, of the prospective development on:

4. Where appropriate the Local Planning Authority may require applications to be accompanied by a Travel Plan that has full regard to the criteria set out in the NPPF.

* Hedges around Wharfdale square are renowned for blocking and impairing the vision of individuals driving around the square (i.e., lots of blind corners). There have been several near misses on Wharfdale Square due to the hedges being overgrown and not thinned appropriately, thereby making it difficult to see oncoming vehicles and increasing the potential of a traffic related incident / accident occurring. As near misses at these corners are already common with the current occupation and traffic levels, and are likely to increase, and lead to actual accidents, both during construction and after occupation of the new site, what are the Developers proposing to alleviate this? This has been highlighted to CBC's Parks and Landscapes department several times, but they have said they only cut the hedges once a year. Construction vehicles entering / leaving the site via one entry / exit point will further exacerbate the issue as the roads are very narrow (especially with residents' cars parked in front their houses). The road around the square is only wide enough for a single car most of the time.

* To ensure highway safety is not compromised, the following needs to be considered: traffic generation, road capacity, means of access, visibility, car parking and effects on pedestrians / cyclists.

* The site of the proposed new development which is prone to flooding when there is heavy rain will be even more vulnerable now than it already is. The site currently functions as a sink for surface water from the surrounding higher area. Adjacent houses and roads already flood in wet weather. Has a FRA been undertaken to ensure that existing residents will not be further impacted by the proposed new development in this current Planning Application? It should also be noted that even without the new development, Brooklyn Road suffers from drainage issues. STW can attest to this, as they have been doing some work to address these issues. The new development will exacerbate these issues. I also suggest going back to any archives you have for 2007 floods, as the plot of land in question and Brooklyn Road were flooded!

* The Cheltenham Local Plan Objective 30 states the following - "to reduce the risk of flooding and flood damage." The Cheltenham Local Plan (Para 13.4) states the following - "The primary responsibility for safeguarding land and property against flooding lies with the owner." Several the houses on Lucinia Mews, Brooklyn Road, etc. which back onto the site next to the proposed new development currently experience issues when it rains heavily (i.e., flooded toilets, sewage reflux, drainage problems, etc.). As this new site, will further exacerbate the issue. have any of these residents been approached by NDH to advise how their development plans will impact these existing houses? A local resident has commented against Planning Application 17/02460/FUL, that Brooklyn Road experiences "localised flooding during and after periods of heavy rain." Has anyone in the Planning Office investigated this aspect, as it was highlighted to them during a meeting with them on 5th February 2018? Also, Severn Trent Water regularly get called out to address drains overflowing on Brooklyn Road. This is without the proposed new development being factored into the equation. I would suggest that STW are approached for comment.

* The Cheltenham Local Plan (Para 13.15 and 13.17) states the following respectively - "Development usually increases the area within a site covered by impermeable materials. This will result in an increase in the quantity and rate of surface water run-off to watercourses. Many watercourses are susceptible to flooding or are only capable of accommodating run-off under pre-development conditions. Additional run-off from development can instigate or exacerbate flooding. In addition, development within flood plains, as well as increasing the risk of flooding, can disrupt existing flood flow regimes,

which, in turn, can result in damage to buildings, property and infrastructure. Supplementary Planning Guidance on Flooding and Sustainable Drainage Systems has been published which sets out in greater detail the requirements for sustainable drainage measures." and "PPG25 states that it is the responsibility of the developer to provide an assessment of whether proposed development is likely to be affected by flooding and whether the development will increase flood risk elsewhere. An assessment may also be needed of the risk of groundwater or local flooding due to overland sheet flow or run-off exceeding the capacity of drainage systems during prolonged or intense rainfall. The developer must satisfy the Council that any flood risk arising from proposed development can be successfully managed with the minimum environmental effect." I believe that the proposed new development is a direct contravention of these principles, and that the Developer intends to direct excess water to Brooklyn Road. The dip in Brooklyn Road has standing water when it rains heavily, and this is without the new development in place. There are regular drainage issues (i.e., overflowing onto the pavements) on Brooklyn Road, as I have already mentioned and I'm sure STW can also attest to this, as they can regularly be seen addressing these issues.

* The site, as shown on Environment Agency flood maps, identifies the risk of pluvial flooding is classified as 'High' and 'Medium'. I would suggest looking into these aspects. As per NPPF guidance it is recommended, given the pluvial flood risk, that a Level 2 Flood Risk Assessment (FRA) is carried out to examine this risk in more detail. The Level 2 FRA should also demonstrate how, through the use of SuDS, the amount of surface water entering sewer systems or local watercourses is managed to minimise the risk of pluvial flooding. Considering the site is undeveloped greenfield land, it is vital to show how any excess surface water resulting from an increase in impermeable areas as part of the development is to be managed. Currently it looks as though the mitigation is to direct excess water to surrounding gardens, particularly those at the bottom of Brooklyn Road. Things will get worse for local residents now the trees have been felled (highlighted against previous Planning Applications), as they would previously have absorbed some of the rainwater during heavy rainfall.

* I understand there is a culverted stream / brook (River Chelt possibly?) that runs under the site. The Cheltenham Local Plan (Para 13.34) states the following - "Both the Council and the Environment Agency are in general opposed to the culverting of watercourses because of the adverse ecological, flood defence and other effects that are likely to arise, unless there is no reasonably practicable alternative or if the detrimental effects of culverting would be so minor that they would not justify a more costly alternative. Where practicable, the Council seeks to restore culverted watercourses to open channels and will require existing culverts to be opened up where they are affected by development proposals. Culverting can exacerbate flooding and destroy wildlife and amenity habitats. Where exceptionally culverting is permitted, suitable measures of mitigation or compensation must be provided (including the opening up of other sections of culvert and enhancing open stretches of watercourse within close proximity to the development). Such measures would be secured within the development by condition or planning obligation." Please can the Developer highlight what they intend to do with this culverted stream in order to meet the Cheltenham Local Plan?

* The drainage and power to the existing development is flaky at best normally, with drainage issues, power cutting off and low water pressure being an intermittent issue. Building new houses and linking them to the same systems and services will only cause more problems. We do not need any more problems!

* Severn Trent Water have said the following against 17/02460/FUL:

"Severn Trent Water advise that there are public sewers located within this site. Public sewers have statutory protection and may not be built close to, directly over or be diverted without consent. You are advised to contact Severn Trent Water to discuss the proposals. Severn Trent will seek to assist in obtaining a solution which protects both the public sewer and the building. Please note, when submitting a Building Regulations application, the building control officer is required to check the sewer maps supplied by Severn Trent and advise them of any proposals located over or within 3 meters of a public sewer. Under the provisions of Building Regulations 2000 Part H4, Severn Trent can direct the building control officer to refuse building regulations approval."

Please can you ensure STW are approached for comment as they may identify issues and stipulate safeguards. Their views are vital to residents of the existing development. I believe there is a high flood risk by building on this plot of land. We have seen actual evidence of this back in the floods of 2007 and when it rains heavily. However, this evidence seems to have been ignored.

* Please can you confirm whether Bromford Housing Association has been made aware of the Planning Application? They have between 15 - 20 houses in Lucinia Mews which will be negatively impacted by the proposed new development, as this Planning Application expands the building plot upon which NDH will already be building 13 houses. Lucinia Mews backs onto it and some of them already experience issues when it rains heavily (i.e. flooded toilets, drainage problems, etc.).

* I have in the past provided CBC's Planning Office with an email chain between local Councillors (John Webster, Sandra Holliday, Mike Skinner, Charmian Sheppard and David Fidgeon) and the ex-lead of the local area's Neighbourhood Watch Scheme stating the following - "the land behind has lots of sewer pipework underneath it and I believe and a ducted watercourse and can't be built on event though it is CC property." I would like to understand what has changed which has now made building on this land possible and whether it will negatively impact the residents of the existing development in any way. The Cheltenham Local Plan (Para 13.38) states the following - "Responsibility for sewerage and sewage treatment lies with Severn Trent Water, which has a duty to provide such public sewers as may be necessary for effectively draining their area, and to provide sewage disposal works which deal effectively with the contents of sewers. Development proposed over or adjacent to a public sewer which would make maintenance or replacement of that sewer unacceptably difficult or would prejudice the structural integrity of the sewer will generally be unacceptable." I believe that the proposed new development is a direct contravention of this principle.

* The building of residential homes will ruin a much-needed recreational area and reduce green space in this part of the town. This land could easily have been made into a children's play area. My understanding was that the land in question was originally going to be used as a nature reserve by the local school. Why did this plan not come to fruition?

* The Human Rights Act, in par

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Comments: 7th December 2022

I am frustrated that residents of Wharfdale Square have not been consulted about this proposal given that all cars accessing this new development, as well as construction vehicles will need to travel via the narrow road in front of their properties. It came as a surprise to see this application given that no work seems to have started with regards to the previous application. The only activity seems to have been a couple of pieces of machinery being on site temporarily which blocked access to the entire estate earlier this year. They were unable to navigate the tight corner, which gives me considerable concerns that the same will be true for other construction vehicles and needs to be addressed in the development plan.

I see that the majority of my concerns have been raised in the comments by the residents of Stone Crescent, but I would also draw your attention to previous planning applications for the site, and the eventual reduction in the number of dwellings. This new application combined with the existing one negates a number of the mitigations in the eventually agreed proposal with regards to instructure load. By splitting the planning in two I am also concerned that they are avoiding some of the regulations, such as those round affordable housing requirements.

The parking layout is also concern, as in reality only half the spaces will be available and it seems that one of the spaces for P7 and P5 would not be able to both be used. This will result on parking on the access roads to the area, preventing access from emergency vehicles, as has happened previously.

Please can the residents of Wharfdale Square be informed of this planned development, and given an opportunity to comment.

26 Cornwall Avenue
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Comments: 23rd June 2023

As most people have already said, this application is just getting round the original refusal of the number of houses originally requested.

Every single one of the previous objections stand - this way to game the number of dwellings requested is making a mockery of the council and planning committee.

To add to the parking problems and cars travelling in the area, the council have put up posts in from of Rowanfield school on both sides of the road to prevent parking.

This has caused people in the morning, lunchtime and evening for school pick ups to park in the side roads in the area.

This will impact even more on the parking problems and, at school drop off / pick up times, put more people at risk with the increased traffic.

Again I can only point out the sly way this planning application has been put in - many people in the immediate area have not received letters saying this is being planned, with a single road receiving them.

I hope that the council see sense and deny this application.

4 Lucinia Mews
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GL51 8DR

Comments: 23rd June 2023

Relationship with 18/02215

22/01891 cannot be considered in isolation. It adjoins another larger proposed development, already approved but not yet built (18/02215). The two sites would effectively form a single development. The impact on the existing site will therefore be not just that of the 6 units in the new proposal, but that of the 19 units in both proposals taken together.

Impact

The main impact of both proposals is on the existing site roads. All residents of, and services for, both the existing and new sites have to use the existing roads. They are already heavily parked, heavily used for school traffic, and have two hazardous blind corners (at the north and east). The grass square is bordered by a fence and hedge, consistently at least 1.7-1.8m high, thus completely hiding approaching compact cars and vans. Many pedestrians, adults and children, residents and school-runners, believe they're safe here because it's a cul-de-sac, but there have already been near-misses at these blind corners.

Risk level

Traffic is likely to be proportionate to the number of units served. The existing site has approximately 60 units and already has traffic issues. We already know 18/02215 will increase this by 13 units (22%) above present. If 22/01891 is also approved, the two new proposals combined will instead increase it by 19 units (32%) above present. A 32% increase in RTA hazards would seriously dent the safety environment for existing residents and school-runners, and would be a poor welcome for prospective purchasers on the new development.

Consultation

NDH consultation on 22/01891 has been insufficient. Because the impact on existing site roads will affect all current residents, NDH should have consulted all existing residents. It has not contacted me, and I don't think I'm alone in that. It claims to have posted two notices during the consultation period, but I didn't see them.

9 Stone Crescent
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Comments: 21st November 2022

I would like to express my objections to 22/01891/FUL. Of gravest concern is that of safety, but I also object on traffic, noise, privacy, visual impact grounds and potential security issues.

The infrastructure within Wharfdale Square and Stone Crescent struggles to safely accommodate its current residents. As a pedestrian and cyclist, I have encountered a number of 'near misses' with cars and vehicles. There are no pavements or raised curbs on Wharfdale Square (in particular, in front of houses 7-11). The road is narrow too, and the tight and blind corners make it extremely difficult to traverse this area safely, no matter what mode of transport. Despite the obvious obstacles, road users do not slow enough, and an extension to Stone Crescent's road will only encourage more speed.

In addition, there are already parking issues around the estate often meaning road users are focused on weaving between stationary vehicles rather than on other vulnerable road users. Access and egress for service vehicles, including that of emergency services, may become problematic.

At school/rush hours these issues are exacerbated. In addition to more traffic and vulnerable pedestrians, I have also experienced first-hand how turning right into Wharfdale Square from Alstone Lane is also a danger. I have had vehicles undertake me, almost hitting me, while I wait for a gap in oncoming traffic. Further development will increase congestion, amplifying the current issues due to the increase in traffic levels.

Application 22/01891/FUL is not "just 7 houses". This plan is in addition to that of 13 houses still yet to be built. This yields 20 houses (of differing nature and resulting residential numbers) in total which alongside the above is unacceptable. Since residing in Stone Crescent, I have seen no indication of work starting on the original planning application.

The seven newer houses are not in-keeping with any of the various styles within the current estates of Stone Crescent, Wharfdale Square, (etc.). They are also of increased storeys, further impacting the privacy of, and potentially that of sunlight for, existing residents.

The current houses within the area are also built close to roads or pavements, in-keeping with the style of a closed Close. With more traffic, residents, etc., current residents will experience disturbances from increased noise levels, and a negative impact on their privacy.

The plan to build 20 residential properties in such a small area of land seems to imply over development.

I am also concerned about the local infrastructure problems which have been mentioned elsewhere. In particular, those such as sewers and the storm drain capacity that will

increase the risks of surface water flooding and back flow of sewage and grey water waste. The development does not seem to have sufficient capacity to drain water away effectively, nor have any mitigation plan in place; particularly should an extreme weather event occur - events that seems to be happening more regularly.

Finally, many of the public comments mention a connection to the KGV playing fields. I object strongly to the idea of installing another access into the park. This would further amplify the points above, and in addition I have witnessed how gangs of youths congregate around the KGV park entrances and would fear the increased anti-social behaviour that I have experienced at these, along with personal safety and security concerns.

Owner of 9 Stone Crescent

Comments: 21st April 2023

I would like to take this opportunity to confirm that my objection and comments as of the 21st November 2022 still remain, despite the small amendment to the site plan.

Furthermore since my previous comment, parked cars and a lack of safe passage around the Wharfdale Square area has worsened.

Finally, I agree and echo the comments and concerns of my neighbours, and trust they are being given all due consideration.

,
Owner of 9 Stone Crescent

5 Stone Crescent
Cheltenham
Gloucestershire
GL51 8DP

Comments: 22nd November 2022

To whom it may concern,

I am a resident of the Stone Crescent, Cheltenham and I am writing to the Council to object the construction at the playing field ask 10 Stone Crescent.

First, the photo of the proposal is misleading, the wide of the road of the Stone Crescent looking towards the application site is just about 2 cars wide, including the driveway parking of 2 opposite sides of the house in Stone Crescent, the left of the road can only drive through by one car only. Also, the road in front of the house 10 and 11 is usually for vans or trucks to reverse their way out since the Stone Crescent is cul-de-cal.

Secondly, since the Stone Crescent, the Lucinia Mews, the South bank and the Wharfdale Square are all cul-de-cal, all the residents of these 4 streets can only drive in and out through the only road, the Wharfdale Square. Besides, during the school drop off

time and pick up time, many cars even parked into the Wharfdale Square. There is a lot of traffic flow in the Wharfdale Square. If the construction proposal is being accepted, the traffic would be really crowded with construction trucks and vans, it would become dangerous for all the students walking to the school and the residents of these 4 streets. In addition, the nearby the Princess Elizabeth Way is already a busy road, the traffic congestion would be more severe if more houses build in the neighborhood. The proposal area is in a well developed living area except the surrounding road is built in years ago and cannot be wider.

Thirdly, suppose the building company cares about the sustainability. The houses in the proposals should not install the gas pipeline and install the solar panels on the roof, electricity boiler and heat pumps in the houses and electric car chargers for environmental reasons. Electricity is a greener and cleaner energy than gas. The government had committed to reduce the carbon emissions and planned to ban the installation of gas boiler in the future.

We understand that the need of housing in Cheltenham area is raising rapidly ,however, is it a great solution to find a little developed area to build a few houses? Are we going to build on every inch of vacant land in the developed area of Cheltenham? There are many vacant areas that can build houses surrounding Cheltenham, with a long term big plan for the development with shops and schools, more houses can be built and more jobs can be provided, thus more people can find affordable house in Cheltenham.

I trust that the council offices can make a right decision.

The residents of Stone Crescent

4 Stone Crescent
Cheltenham
Gloucestershire
GL51 8DP

Comments: 9th April 2023

Hi, I am one of the tenants at 4 Stone Crescent.

I've read all the existing objections and I couldn't agree more with them.

Also, this will affect not only Stone Crescent but anywhere between Alston Ln and the building site. As my neighbours said, these roads are tiny and full of parked cars causing a massive nightmare, especially in the morning when parents drop off kids at school, they also use those roads to park their vehicles.

Almost every day when I go to work I have difficulties driving out of this area due to the school run heavy traffic which must be done very carefully as there are a lot of children around. How it would be with heavy machinery driving around? I don't believe they will even be able to access those roads in certain circumstances.

The picture in the documentation is not accurate and I believe it's very old, as the normal scenario is totally different. We have several cars parked everywhere from Alston Ln until

the building site, even worse after COVID because most of us can work from home full-time, so the normal daily scenario is a lot of cars everywhere.

I am not going out to move my car if any big lorry or heavy machinery can't access the building site and I'll be glad to check CCTV due to any damage was caused to any of our cars.

Other problems concerning me:

- How dirty are the roads going to get?
- How the noise it'll be controlled? considering a lot of people are working from home.
- How much pollution (including dust) it'll make? I have severe asthma and I bet other people around may have similar health issues).
- Where all the contractor's vehicles are going to park as the road already is a complete nightmare to park?

I am glad to take photos around the area which reflects a much more accurate situation including all the traffic in the morning, children walking everywhere from Alston Ln until Stone Crescent and how chaotic is the car parking situation.

The picture provided in the documentation makes the road looks much wider than actually is, and there is only one car parked.

A simple example is if you access Google Map Street View from June 2019 you can see how many cars normally we have around. But as said before, in the morning it's chaotic and this will be the time that the builders are going to be around too.

<https://www.google.com/maps/@51.9055232,-2.1043726,3a,75y,232.44h,76.11t/data=!3m6!1e1!3m4!1sInepB3rgnCIT0DyEBhYdCg!2e0!7i13312!8i6656>

11 Stone Crescent
Cheltenham
Gloucestershire
GL51 8DP

Comments: 20th November 2022

,

I would like to express my concerns in regard to planning application no. 22/01891/FUL. I am an owner of a property at 11 Stone Crescent, and I would like to describe several issues related to traffic, safety and amenity in relation to that application.

Traffic in the area is very heavy. The school on Alstone Ln and adjacent to Stone Crescent is a big public school attended by hundreds of students every day. The road that leads to stone crescent from Alstone Ln is used for a drop-off at 9:00 and pick-up at 15:00 everyday excluding term holidays. Only one lane is available on the access road from Alstone Ln on through Wharfdale Square to Stone Crescent, because of the number of cars that are being parked there. Children are running around to access the cars. Moreover, there is no curb on the side of the road next to Wharfdale Square number 7-11. Stone Crescent is already full of vehicles as some of the houses are shared between multiple tenants. On the stone crescent alone, at least 7 children live and use the road to

play together and meet with each other. Everyday these children go on walks to the KGV park in various parts of the day. One of them being my son. That leads me to my first concern. I believe that safety measures are inadequate to the traffic, and transport of heavy-duty equipment and materials to build the development of 7 big houses in addition to 13 previously proposed houses and all of the infrastructure required.

During the first work that has been done in relation to the accepted development of 13 houses adjacent to stone crescent no.10. I have been woken-up around 7:30 by a construction company that was loading an excavator next to my car and entrance to my house. Not only the company (a contractor of New Dawn homes) were performing work outside of their permitted working hours 8:00 - 18:00. I have confirmed that with a planning enforcement officer from Cheltenham Borough Council. There was also no-one who was supposed to oversight the work and inform people about potential safety issues during that operation.

When I asked an owner of the land and proposer of the application 22/01891/FUL about the risk assessment for that loading operation, the answer was "there is one, probably". That leads me to thinking that he does not perform his due diligence in ensuring a safe manner of work and he does not control his contractors with the work being done. It is absolutely unacceptable to perform this type of activity without any safety measures, especially when there are multiple children in the area.

My last concern is related to the amenity of the area which will be damaged by the fact that all of the proposed dwellings in this application are terraced or semi-detached houses. Considering the fact that all of the houses on stone crescent are detached houses, that development will impact the attractiveness and pleasantness of the street. Additionally, traffic created by 20 houses in total, using that one street in my opinion will be unbearable and very dangerous in the long term.

To sum up, I would like to express my serious concerns about the issues above, especially safety and I would kindly ask you to consider this comment in a very serious manner. Protection of our little ones should be a priority and without additional access to the site from for example the park I cannot see it being safe enough.

Yours faithfully,

Owner of 11 Stone Crescent.

15 Wharfdale Square
Cheltenham
Gloucestershire
GL51 8DL

Comments: 23rd June 2023

There are quite a few reasons why the Planning Application should not be approved. As a resident of the area who was NOT consulted directly via a notification letter, I feel I am best placed to know the problems and issues that the proposed new development will cause to the area and local residents. My concerns / points about this particular Planning Application are as follows:

* I would expect all objections raised against previous Planning Applications 14/01276/OUT, 17/00407/FUL, 18/01661/FUL and 18/02215/FUL to also be considered relevant to this current Planning Application, as they all use the same access point (i.e., the site in question is directly adjacent to the site which was covered by the aforementioned Planning Applications).

* The following articles are also pertinent, and I will be getting in touch with the press to make them aware of this new planning application:

- <https://www.gloucestershirelive.co.uk/news/cheltenham-news/fears-plans-homes-near-cheltenham-1148653>

- <https://www.gloucestershirelive.co.uk/news/cheltenham-news/plans-new-housing-estate-could-1472592>

* There is a clear imbalance and discrepancy between the number of residents that were informed about the previous development versus the number that have been aware this time around. Residents of Wharfdale Square, Stone Bank and Lucinia Mews should also have been informed about this planning application. Due to there being only a single entry / exit point to the proposed new development I would have expected at least 60 residents to have been provided with letters of notification. Only 11 letters of notification were sent out to residents of Stone Crescent. The Planning Office were pulled up on this previously by me, admitted fault and thereafter sent additional letters out. This has not been the case this time around and as such I have a Stage 2 Complaint in progress, which will likely have to progress to the Local Government Ombudsman, unless CBC do the right thing.

* There will be an increase in traffic and congestion to / from the area, which is already overburdened. This is both during the development phase and once the houses have been built. According to the plans the proposed new development may only be for 6 houses, but 13 houses have already been approved under previous planning applications (mentioned above). Residents of Wharfdale Square, Lucinia Mews, Stone Crescent and South Bank will be heavily impacted by this increase in traffic, as there is only a single entry / exit point to the area. Construction traffic would have to access the site via Wharfdale Square and Stone Crescent. Construction traffic may not be able to negotiate / manoeuvre these tight turns safely when there are cars parked on both sides of the road. The existing road on Stone Crescent via Wharfdale Square was not designed to sustain such a large, potential increase in traffic flow. There have already been instances of vehicles belonging to existing residents being damaged by HGVs passing through the square. HGVs are required to reverse into Stone Crescent rather than drive straight in. Come and see this for yourselves if you don't believe me (Tuesday mornings are the best)! It's worth noting that New Dawn Homes (NDH) did some work on their existing site

(18/02215/FUL) last year and had issues getting their HGVs into and out of the square. Refuse collectors also have issues and regularly have to ask people to move their cars. Only last year their negligent driving caused them to reverse into my car, which ended up getting written off (they admitted guilt and I did receive a payout after a few months of wasted effort chasing on my part). The point I'm trying to make here is that the local block paved roads are not geared up to handle HGVs and the additional traffic. This area has been established and maturing for over 22 years now. Residents should not have to tolerate this additional upheaval!

* There will be severe disruptions to the lives of existing residents. At present when cars are parked outside their own properties it is difficult if not impossible for 2 moving cars travelling in opposite directions to pass one another, as the roads are very narrow. There is no mention of the number of vehicular trips the site will generate, and a trip generation exercise has not been undertaken.

* According to the plans the proposed new development will be for 6 houses / 18 bedrooms. However according to the Revised proposed site layout plan, there are only 11 parking spaces allocated to these houses. This is clearly not enough and such residents of these new houses will impeach on existing parking.

* We have one narrow entrance roadway into the area with cars permanently parked down one side of it which is a nightmare normally when entering and exiting the square. This means only one vehicle can travel up or down the road at a time. How will this work for large lorries and building works vehicles on what is essentially a one-way access to the area? Then there is the added issue of how the block paved road itself will cope with the additional heavily laden lorries and diggers, etc. Has anyone visited the square at peak times (i.e., school drop off / pick up times) to see the issues that we currently experience? Probably not....

* There will be a reduction in the amount of parking available in the area. Parking is already at a premium in the area. Construction vehicles parked in the existing estate will further exacerbate this problem. If contractors' and site workers' vehicles were to park in the existing development during construction, they would quickly swamp and block the existing development. This would be unacceptable for current residents. Construction traffic must not be allowed to park on the existing development if this Planning Application is approved. During school start and finish times cars are parked alongside the entrance to the square and all around it. Access is impeded by parents dropping off and collecting children from Rowanfield Infant and Junior schools and using the square as a car park. There are a lot of cars parked illegally around this time, which has been highlighted to CBC and our local Councillor in the past, but they have chosen to ignore this fact, as it would involve them doing something about it and earning their keep! The entrance road is often double parked during these times, making passage even more difficult and dangerous. This will make it difficult for construction vehicles to enter / exit the site. An average of 1.83 cars has been allocated per house in the proposed new development. This will increase exponentially if the dwellings are Houses in Multiple Occupation (HMO), which a high quantity of the existing houses in the area already are. What are CBCs parking guidelines - specifically what is the minimum level of car parking that proposed new developments should offer, according to its size? I do not believe that the proposed new development provides sufficient parking space to meet these requirements. The proposed development is likely to generate a significant increase in the amount of local traffic and as such any loss of on-road parking could mean the loss of a valuable residential amenity.

* With the proposed new development there will be a loss of existing parking spaces at the end of Stone Crescent that are in regular use. Where will these cars park? You should visit Stone Crescent in the evening and see all of the parked cars you will be displacing if this Planning Application is approved.

* Annex 5 Manual for Gloucestershire Streets (4th Edition) 2016 - "Developers are encouraged to calculate the parking demand that would be generated by the proposed development using the methodology set out in the NPPF and submit this evidence with the planning application. 2011 Census data in respect of car ownership is available for super output areas and this should be the starting point for determining likely car ownership levels for your development". No justification for parking standards based on census data has been provided in the Planning Design and Access Statement.

* No assessment of the site's accessibility and opportunities for sustainable travel have been undertaken. It is necessary to identify what local services and amenities are located in proximity to the site, and also what alternative sustainable travel opportunities are present to enable future residents and visitors to choose sustainable alternatives i.e., walking, cycling and public transport facilities in proximity to the site.

* Please take the time to visit the local area at the pertinent times (e.g., school start times, school end times, in the evening when people have returned from work, when the refuse collections are taking place, etc.) prior to making a decision about the Planning Application. This clearly has not happened up to now or you wouldn't even be considering this Planning Application.

* I would expect the NDH literature (Design and Access Statement) to be updated for the following reasons:

- to accurately image the parking situation, as the image shown on Page 3 was clearly taken at a time of day when there is plenty of available parking (i.e., people are at work). This image has also been stretched (i.e., doctored deliberately?) by the document creator to mislead the Planning Office into thinking that Stone Crescent is a lot wider than it actually is.
- to accurately reflect the number of houses that are being proposed. Says 7 when the application is for 6 houses.
- to accurately reflect the number of garages and parking spaces being made available.

A decision must not be based on the inaccurate / incorrect representation of the current situation, which NDH has provided in their literature.

* See the image provided in the objection letter provided by 6 Stone Crescent (Planning Application 17/02460/FUL) for an accurate representation of the parking situation in Stone Crescent. Also see the images in Gloucestershire Live (<https://www.gloucestershirelive.co.uk/news/cheltenham-news/fears-plans-homes-near-cheltenham-1148653> and <https://www.gloucestershirelive.co.uk/news/cheltenham-news/plans-new-housing-estate-could-1472592>) for an accurate representation of the parking situation at school pick up time. Against Planning Application 18/01661/FUL, I supplied Michelle Payne (previous Planning Officer) with a document which provides an accurate representation of the parking situation on Stone Crescent and in the local area. The provided document should be taken into consideration when making the decision about this current Planning Application and was uploaded on 31/08/2018 if you want to see it for yourself.

* The NDH literature (Design and Access Statement) states - "3.1 - Paragraph 14 of the NPPF is clear that for decision taking, the presumption in favour of sustainable development means approving development proposals that accord with the development plan without delay". However Paragraph 13 of the NPPF states - "The National Planning Policy Framework constitutes guidance for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications." Guidance is defined as "advice or information aimed at resolving a problem or difficulty, especially as given by someone in authority." As such it may or may not be followed dependent on external factors. What the NDH literature (Design and Access Statement) does not state is that "where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless: - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or - specific policies in this Framework indicate development should be restricted." As such, due care and consideration should be taken prior to making a decision about the Planning Application. This means not making a rash decision without knowing the full facts as the NDH literature (Design and Access Statement) seems to be intimating that approval is a foregone conclusion.

* The Construction Method Statement is not on the Website against the Planning Application. Please make this statement publicly available and provide details of who to contact / escalate this to if NDH does not meet its obligations under the provided Construction Method Statement if this Planning Application is approved. My understanding of this is as follows - "No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall:

- i. specify the type and number of vehicles;
 - ii. provide for the parking of vehicles of site operatives and visitors;
 - iii. provide for the loading and unloading of plant and materials;
 - iv. provide for the storage of plant and materials used in constructing the development;
 - v. provide for wheel washing facilities;
 - vi. specify the intended hours of construction operations;
 - vii. measures to control the emission of dust and dirt during construction
- Reason: To reduce the potential impact on the public highway."

* Children can regularly be seen playing around the area throughout the day and there are also children walking to / from the school during school pick up and drop off times. This poses a health and safety issue, as during the development phase and post the development phase traffic flow will increase significantly, which also increases the chances of a traffic related incident / accident occurring. Pedestrian safety is imperative! No assessment has been made of the local highway network in terms of reviewing personal injury collisions in proximity to the site, etc. Note that there are no designated footpaths / pavements in Wharfdale Square, so individuals (adults and children alike) are regularly seen walking on the roads as there is no alternative due to existing residents park outside their houses (i.e., effectively the pavement). Residents of the local area have over the years become aware of this and drive accordingly but there are still several 'near misses' in the area.

* The Joint Core Strategy (JCS) is a partnership between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council. The link is here -

<https://www.gloucester.gov.uk/media/5441/jcs.pdf>. At a minimum I would expect the following Policies to be met in this Planning Application - SD4 and INF1. Please articulate where and how you are not meeting them?

Policy SD4: Design Requirements

1. Where appropriate, proposals for development - which may be required to be accompanied by a masterplan and design brief - will need to clearly demonstrate how the following principles have been incorporated:

- i. Context, Character and Sense of Place; New development should respond positively to, and respect the character of, the site and its surroundings, enhancing local distinctiveness, and addressing the urban structure and grain of the locality in terms of street pattern, layout, mass and form. It should be of a scale, type, density and materials appropriate to the site and its setting. Design should establish a strong sense of place using streetscapes and buildings to create attractive and comfortable places to live, and having appropriate regard to the historic environment.
- ii. Legibility and Identity; New development should create clear and logical layouts that create and contribute to a strong and distinctive identity and which are easy to understand and navigate. This should be achieved through a well-structured and defined public realm, with a clear relationship between uses, buildings, routes and spaces, and through the appropriate use of vistas, landmarks and focal points.
- iii. Amenity and space; New development should enhance comfort, convenience and enjoyment through assessment of the opportunities for light, privacy and external space, and the avoidance or mitigation of potential disturbances, including visual intrusion, noise, smell and pollution.
- iv. Public realm and landscape; New development should ensure that the design of landscaped areas, open space and public realm are of high quality, provide a clear structure and constitute an integral and cohesive element within the design. The contribution of public realm designs, at all scales, to facilitate the preferential use of sustainable transport modes should be maximised.
- v. Safety and security; New development should be designed to contribute to safe communities including reducing the risk of fire, conflicts between traffic and cyclists or pedestrians, and the likelihood and fear of crime.
- vi. Inclusiveness and adaptability; New development should provide access for all potential users, including people with disabilities, to buildings, spaces and the transport network, to ensure the highest standards of inclusive design. Development should also be designed to be adaptable to changing economic, social and environmental requirements.
- vii. Movement and connectivity; New development should be designed to integrate, where appropriate, with existing development, and prioritise movement by sustainable transport modes, both through the application of legible connections to the wider movement network, and assessment of the hierarchy of transport modes set out in Table SD4a below. It should:
 - Be well integrated with the movement network within and beyond the development itself
 - Provide safe and legible connections to the existing walking, cycling and public transport networks;
 - Ensure accessibility to local services for pedestrians and cyclists and those using public transport
 - Ensure links to green infrastructure;
 - Incorporate, where feasible, facilities for charging plug-in and other ultra-low emission vehicles;
 - Be fully consistent with guidance, including that relating to parking provision, set out in the Manual for Gloucestershire Streets and other relevant guidance documents in force at the time.

2. Detailed requirements of masterplans and design briefs, should the Local Planning Authority consider they are required to accompany proposals, are set out in Table SD4d. These requirements are not exhaustive.

Policy INF1: Transport Network

1. Developers should provide safe and accessible connections to the transport network to enable travel choice for residents and commuters. All proposals should ensure that:
2. Planning permission will be granted only where the impact of development is not considered to be severe. Where severe impacts that are attributable to the development are considered likely, including as a consequence of cumulative impacts, they must be mitigated to the satisfaction of the Local Planning Authority in consultation with the Highway Authorities and in line with the Local Transport Plan.
3. Developers will be required to assess the impact of proposals on the transport network through a Transport Assessment. The assessment will demonstrate the impact, including cumulative impacts, of the prospective development on:
4. Where appropriate the Local Planning Authority may require applications to be accompanied by a Travel Plan that has full regard to the criteria set out in the NPPF.

* Hedges around Wharfdale square are renowned for blocking and impairing the vision of individuals driving around the square (i.e., lots of blind corners). There have been several near misses on Wharfdale Square due to the hedges being overgrown and not thinned appropriately, thereby making it difficult to see oncoming vehicles and increasing the potential of a traffic related incident / accident occurring. As near misses at these corners are already common with the current occupation and traffic levels, and are likely to increase, and lead to actual accidents, both during construction and after occupation of the new site, what are the Developers proposing to alleviate this? This has been highlighted to CBC's Parks and Landscapes department several times, but they have said they only cut the hedges once a year. Construction vehicles entering / leaving the site via one entry / exit point will further exacerbate the issue as the roads are very narrow (especially with residents' cars parked in front their houses). The road around the square is only wide enough for a single car most of the time.

* To ensure highway safety is not compromised, the following needs to be considered: traffic generation, road capacity, means of access, visibility, car parking and effects on pedestrians / cyclists.

* The site of the proposed new development which is prone to flooding when there is heavy rain will be even more vulnerable now than it already is. The site currently functions as a sink for surface water from the surrounding higher area. Adjacent houses and roads already flood in wet weather. Has a FRA been undertaken to ensure that existing residents will not be further impacted by the proposed new development in this current Planning Application? It should also be noted that even without the new development, Brooklyn Road suffers from drainage issues. STW can attest to this, as they have been doing some work to address these issues. The new development will exacerbate these issues. I also suggest going back to any archives you have for 2007 floods, as the plot of land in question and Brooklyn Road were flooded!

* The Cheltenham Local Plan Objective 30 states the following - "to reduce the risk of flooding and flood damage." The Cheltenham Local Plan (Para 13.4) states the following - "The primary responsibility for safeguarding land and property against flooding lies with the owner." Several the houses on Lucinia Mews, Brooklyn Road, etc. which back onto

the site next to the proposed new development currently experience issues when it rains heavily (i.e., flooded toilets, sewage reflux, drainage problems, etc.). As this new site, will further exacerbate the issue. have any of these residents been approached by NDH to advise how their development plans will impact these existing houses? A local resident has commented against Planning Application 17/02460/FUL, that Brooklyn Road experiences "localised flooding during and after periods of heavy rain." Has anyone in the Planning Office investigated this aspect, as it was highlighted to them during a meeting with them on 5th February 2018? Also, Severn Trent Water regularly get called out to address drains overflowing on Brooklyn Road. This is without the proposed new development being factored into the equation. I would suggest that STW are approached for comment.

The Cheltenham Local Plan (Para 13.15 and 13.17) states the following respectively - "Development usually increases the area within a site covered by impermeable materials. This will result in an increase in the quantity and rate of surface water run-off to watercourses. Many watercourses are susceptible to flooding or are only capable of accommodating run-off under pre-development conditions. Additional run-off from development can instigate or exacerbate flooding. In addition, development within flood plains, as well as increasing the risk of flooding, can disrupt existing flood flow regimes, which, in turn, can result in damage to buildings, property and infrastructure. Supplementary Planning Guidance on Flooding and Sustainable Drainage Systems has been published which sets out in greater detail the requirements for sustainable drainage measures." and "PPG25 states that it is the responsibility of the developer to provide an assessment of whether proposed development is likely to be affected by flooding and whether the development will increase flood risk elsewhere. An assessment may also be needed of the risk of groundwater or local flooding due to overland sheet flow or run-off exceeding the capacity of drainage systems during prolonged or intense rainfall. The developer must satisfy the Council that any flood risk arising from proposed development can be successfully managed with the minimum environmental effect." I believe that the proposed new development is a direct contravention of these principles, and that the Developer intends to direct excess water to Brooklyn Road. The dip in Brooklyn Road has standing water when it rains heavily, and this is without the new development in place. There are regular drainage issues (i.e., overflowing onto the pavements) on Brooklyn Road, as I have already mentioned and I'm sure STW can also attest to this, as they can regularly be seen addressing these issues.

* The site, as shown on Environment Agency flood maps, identifies the risk of pluvial flooding is classified as 'High' and 'Medium'. I would suggest looking into these aspects. As per NPPF guidance it is recommended, given the pluvial flood risk, that a Level 2 Flood Risk Assessment (FRA) is carried out to examine this risk in more detail. The Level 2 FRA should also demonstrate how, through the use of SuDS, the amount of surface water entering sewer systems or local watercourses is managed to minimise the risk of pluvial flooding. Considering the site is undeveloped greenfield land, it is vital to show how any excess surface water resulting from an increase in impermeable areas as part of the development is to be managed. Currently it looks as though the mitigation is to direct excess water to surrounding gardens, particularly those at the bottom of Brooklyn Road. Things will get worse for local residents now the trees have been felled (highlighted against previous Planning Applications), as they would previously have absorbed some of the rainwater during heavy rainfall.

* I understand there is a culverted stream / brook (River Chelt possibly?) that runs under the site. The Cheltenham Local Plan (Para 13.34) states the following - "Both the Council

and the Environment Agency are in general opposed to the culverting of watercourses because of the adverse ecological, flood defence and other effects that are likely to arise, unless there is no reasonably practicable alternative or if the detrimental effects of culverting would be so minor that they would not justify a more costly alternative. Where practicable, the Council seeks to restore culverted watercourses to open channels and will require existing culverts to be opened up where they are affected by development proposals. Culverting can exacerbate flooding and destroy wildlife and amenity habitats. Where exceptionally culverting is permitted, suitable measures of mitigation or compensation must be provided (including the opening up of other sections of culvert and enhancing open stretches of watercourse within close proximity to the development). Such measures would be secured within the development by condition or planning obligation." Please can the Developer highlight what they intend to do with this culverted stream in order to meet the Cheltenham Local Plan?

* The drainage and power to the existing development is flaky at best normally, with drainage issues, power cutting off and low water pressure being an intermittent issue. Building new houses and linking them to the same systems and services will only cause more problems. We do not need any more problems!

* Severn Trent Water have said the following against 17/02460/FUL:

"Severn Trent Water advise that there are public sewers located within this site. Public sewers have statutory protection and may not be built close to, directly over or be diverted without consent. You are advised to contact Severn Trent Water to discuss the proposals. Severn Trent will seek to assist in obtaining a solution which protects both the public sewer and the building. Please note, when submitting a Building Regulations application, the building control officer is required to check the sewer maps supplied by Severn Trent and advise them of any proposals located over or within 3 meters of a public sewer. Under the provisions of Building Regulations 2000 Part H4, Severn Trent can direct the building control officer to refuse building regulations approval."

Please can you ensure STW are approached for comment as they may identify issues and stipulate safeguards. Their views are vital to residents of the existing development. I believe there is a high flood risk by building on this plot of land. We have seen actual evidence of this back in the floods of 2007 and when it rains heavily. However, this evidence seems to have been ignored.

* Please can you confirm whether Bromford Housing Association has been made aware of the Planning Application? They have between 15 - 20 houses in Lucinia Mews which will be negatively impacted by the proposed new development, as this Planning Application expands the building plot upon which NDH will already be building 13 houses. Lucinia Mews backs onto it and some of them already experience issues when it rains heavily (i.e. flooded toilets, drainage problems, etc.).

* I have in the past provided CBC's Planning Office with an email chain between local Councillors (John Webster, Sandra Holliday, Mike Skinner, Charmian Sheppard and David Fidgeon) and the ex-lead of the local area's Neighbourhood Watch Scheme stating the following - "the land behind has lots of sewer pipework underneath it and I believe and a ducted watercourse and can't be built on event though it is CC property." I would like to understand what has changed which has now made building on this land possible and whether it will negatively impact the residents of the existing development in any way. The Cheltenham Local Plan (Para 13.38) states the following - "Responsibility for

sewerage and sewage treatment lies with Severn Trent Water, which has a duty to provide such public sewers as may be necessary for effectively draining their area, and to provide sewage disposal works which deal effectively with the contents of sewers. Development proposed over or adjacent to a public sewer which would make maintenance or replacement of that sewer unacceptably difficult or would prejudice the structural integrity of the sewer will generally be unacceptable." I believe that the proposed new development is a direct contravention of this principle.

* The building of residential homes will ruin a much-needed recreational area and reduce green space in this part of the town. This land could easily have been made into a children's play area. My understanding was that the land in question was originally going to be used as a nature reserve by the local school. Why did this plan not come to fruition?

* The Human Rights Act, in partic