Application Response 2

Land at Oakley Farm, Cheltenham 24/00251/CONDIT

Friends of Oakley Farm Pasture Slopes

www.oakleyfarmpastures.wixsite.com/oakley

The Friends of Oakley Farm Pasture Slopes – Response-2 to Planning Application 24/00251/CONDIT.

Thank you for the opportunity to once again comment on this application.

From our detailed review below, points for consideration:

1. Without the imposition of Condition 13 as written the appeal would not have been allowed.
2. The Inspector imposed the gradients limits within Condition 13 to ensure safe, permeable, and suitable access for all users. He wanted more than the local and national guidance offered.
3. The Inspector was aware that the gradient condition was an enhancement to the Manual for Gloucestershire Streets guidance and he had been made fully aware of the gradient's planning condition evolution.
4. The Applicant's concerns regarding adhering to the Alternative Illustrative Masterplan and gradient's planning condition compliance should have been fully recognised and raised pre-application.
5. Changing the gradient's condition to match the proposed scheme is not good planning practice.
6. It is regrettable that both the Highway Authority and the Applicant overlooked the gradient detail present in Condition 13.
7. With hindsight, we presume that had the applicant made themselves fully aware of the gradient planning condition, they would have proposed a gradient compliant plan at the outset. The opportunity is now available to do that.
8. The applicants must be minded that the approval is for a scheme of up to 250 houses, at its extreme that is between 1 and 250.
9. The applicant contends that the conditioned outline scheme cannot be implemented without losing TPO'd trees through significant ground engineering intervention and constructing large retaining structures in the Root Protection Zones of TPO'd trees.
10. In a similar vein, the applicant suggests that compliance with the outline scheme would require significant ground level changes, up to 5m in places.
11. The applicant also intimates, that the outline scheme as approved at appeal is not deliverable without the removal of a large number of TPO'd trees.
12. Regarding points 9 - 11. The applicant should be reminded that planning conditions and Parameter Plans are established to regulate future ground levels and safeguard all TPO'd trees within this National Landscape. Therefore, their argument lacks validity. Refer to Conditions 5 & 26 and Parameter Plans. (pg. 14 & 15 below)
13. Similarly, when the Planning Officer directs members to determine between the original Condition 13 and the newly revised version for the site's development,[1] it constitutes a false dilemma, failing to take into account the aforementioned factors. (Points 9-12 above).

[1] Officers Report to Committee. 6.58.

14. The claimed requirement for significant engineering intervention contradicts the documented statement made by the appellants during the appeal. See footnote 4, pg. 5.
15. The gradients of the main access route are not in general accord with the maximum gradient of 1:20 as conditioned. They exceed this maximum for c56% of the total road's length. See figs. 1&2.
16. c20% of the main access road is proposed with gradients at the "ultimate maximum"[2] of 1:12. See figs. 1&2. Again, highlighting not in general accordance as conditioned.
17. One section of the access road is a continual slope with an average gradient of 1:13.5 for 270m, far beyond the conditioned 30m maximum length.
18. A further small section of road fails compliance with both Condition 13 and the Manual for Gloucestershire Streets, with gradient exceeding 1:12.
19. Questionably, the Highway Authority has confirmed, albeit somewhat sympathetically, that the REM scheme complies with the MfGS. However, adherence to Condition 13, which imposes a more stringent gradient standard, is the goal rather than merely meeting the MfGS.
20. The consensus, excluding the applicant, is that the current wording of Condition 13 is clear and unambiguous, making any amendment to it unnecessary in this regard.
21. The inclusion of safety, landscape features, and other determinative elements in the newly proposed Condition 13 amendment, only serve to add complexity to an otherwise succinct and clear condition. These elements are already thoroughly addressed in other planning conditions and parameter plans. They are redundant in a gradient condition and would cloud its simple objectivity.
22. The newly proposed amendment also introduces unnecessary complication and ambiguity, and dilutes the condition's effectiveness, deviating from the straightforward and objective nature of the currently worded Condition 13.
23. The application to revise Condition 13 should be denied, as it already serves its intended purpose exceptionally well.
24. While it's regrettable that the applicants are encountering challenges, the potential burden of this oversight in road design should not fall upon or be detrimental to the future users of the development or the broader community of Cheltenham.
25. The Inspector's Decision Letter DL127 states: "...the requirement of the condition is fundamental to make the scheme acceptable in planning terms." Therefore, it's implicit within DL127 that without the current condition as written, the scheme would not be deemed acceptable.

[2] The maximum gradient is Condition as 1:20. We have used the term "Ultimate Maximum" to indicate a "considered" gradient of 1:12.

Introduction.

The application seeks consent to vary Condition 13 of the outline permission … to address ambiguity inherent in the original wording of the condition that has become apparent during the latter stages of the reserved matters determination process (23/01691/REM)

It is evident to us that the application is submitted solely to amend the wording of Condition 13 in order to address perceived ambiguity. The initial consultee response from the Friends addressed this issue, by focusing on the evolution of Condition 13 at appeal, and the inspector's rationale for including the condition in the outline permission. Subsequently, the applicant has submitted additional documentation, prompting us to provide a second response in order to offer our perspective in light of this new information.

Adherence to Planning Conditions.

Conditions are intended to ensure that proposed developments align with specific criteria or mitigate potential negative impacts.

The applicant is seeking to change the wording of Condition 13 of the subject planning application for reasons of ambiguity and preciseness. Our response to this is covered in our Initial Response document.

We recently became aware of additional information presented by the applicant,[2] suggesting that to adhere to the approved outline plan, it would purportedly lead to dire consequences for the AONB landscape. The applicants claim that TPO'd trees would be removed or damaged, existing ground levels would need to be raised by significant amounts, and there would be a greater incidence of overlooking to neighbouring land.

In response to this gloomy prediction, we offer the following rebuttal.

The applicant, in evaluating the feasibility of adhering to the Illustrative Masterplan of the outline planning permission, presents a pessimistic scenario.[3] They acknowledge that compliance with the approved outline plan and its Masterplan is possible but emphasise that there will be a need for the removal of TPO'd trees and extensive engineering efforts, including raising some ground levels by up to 5m and installing large retaining structures in the Root Protection Zone of TPO'd trees. Consequently, claiming that this would result in the loss of a substantial number of TPO'd trees. We perceive this portrayal as doom-laden and alarmist. There are planning checks and safeguards in place to control and prevent such possibilities, for example:

1. The removal or potential harm to TPO'd trees would necessitate a new planning application and subsequent approval.
2. The envisaged engineering works would conflict with existing planning conditions. Condition 5 requires that applications for approval of reserved matters shall be in substantial accordance with the Building Heights Parameter Plan. The BHPP carries the notice that "Future ground levels allows for a maximum of 1.5m above existing ground level…". See annexes.
3. TPO'd trees are protected under Condition 5, which states: "…For the avoidance of doubt applications for approval of reserved matters shall be in substantial accordance with the…Green Infrastructure Parameter Plan …". TPO'd trees are individually identifiable in the GIPP. See annexes.

[3] Email to Planning Officer, 5 Mar 2024 10:10. Para.2 Annex C

4. When referring to retained trees, (TPO'd trees) Condition 26 states "...Existing ground levels shall remain the same within the Root Protection Areas..."
5. Condition 26 also details the extensive protection for operations within the tree's RPZs, including no dig policy.
6. Condition 5 states that "...details to be submitted as part of the reserved matters for ...landscaping shall be in general accordance with the design and layout principles of the Alternative Illustrative Masterplan...in respect of the following:... retained structural landscaping..." TPO'd trees are individually identifiable on the AIM.

From a cynical perspective, it's plausible that the applicant might submit further planning applications to modify the wording and specifics of these restrictive conditions, ie. further section 73 applications. We would strongly oppose this should it transpire.

The appellants at the Inquiry assured the Inspector that a scheme based on the Alternative Illustrative Masterplan (AIM) and approved parameter plans was feasible and would not bring significant engineering issues,[4] whereas the new applicant, armed with the same information, disputes this assertion.

In truth, the approval of the planning appeal was based on the evidence provided at the inquiry, and the conditions set by the Inspector. Should it transpire that the conditioned scheme is truly unachievable, then the concerns raised by the current applicant should have been addressed earlier, either before submitting their planning request or even prior to that.

Worthy of note in this regard, from the Inspector's Decision Letter DL127, states: "A number of these conditions relate to pre-commencement activities. In each case, **the requirement of the condition is fundamental to make the scheme acceptable** in planning terms. Subject to the imposition of these conditions, I conclude that the appeal should be allowed." (our bold).

In our interpretation, this indicates that meeting the above conditions, numbers 5 and 26,[5] in addition to the subject gradients Condition 13, is imperative. In each instance, absolute compliance with these conditions is crucial for deeming the scheme acceptable in planning terms. Therefore, any material alteration to a condition, such as that now proposed for Condition 13, would render the scheme unacceptable, and consequently, approval should be refused.

When considering that the outline permission is for **up to** 250 houses on the site – we view that altering the dwelling count could indeed adjust the road configuration. Our view is that the layout of the road is notably influenced by the topography but also linked directly to the number of dwellings. Consequently, reducing the number of dwellings, within the constraints of the appeal decision, could make a reserved matters application acceptable.

Road Design for all Users.

In his decision letter, the Inspector did not delve into specific road design details for motorised vehicles. No particular speed limit for the main access road or recommendations for vertical curve design were suggested. Clearly, the Inspector anticipated that the Local Highway

[4] ID 24 "…Drawing 18017.202 however, illustrates that excessive engineering operations would not be required. The marginal amendment to the layout … in horizontal alignment within the residential parcel allows for the road to follow the contour without excessive cut and fill and the proposed dwellings can be accommodated comfortably within the requirements of the Parameter Plan."
[5] We understand that Condition 26 is not a pre-commencement condition, however it has relevance.

Authority would address these issues during the reserve matters stage, applying local and national guidance as appropriate.

The Inspector could have also chosen to delegate pedestrian-related gradient matters to the Local Highway Authority. However, he opted for an alternative approach, aiming to establish a more robust framework for accommodating pedestrian and cyclist movement on the site. This choice resulted in the imposition of Condition 13 and its gradient limits, which surpassed both National and Local guidance, as detailed in our Initial Response.

To guarantee safe, permeable, and suitable access for all users throughout the site, we view that the inspector determined that conditioning gradients in a clear and unambiguous manner was required. It now appears that both the applicant and the Highway Authority overlooked this conditioned standard, relying solely on the less than clear guidance provided in the MfGS.

When examining the proposed road design, it becomes clear that the applicant has extensively ridden the “ultimate maximum” limit of 1:12, and in one instance, even surpassed this criterion. Their statement that "at no point within any vertical curve sections does the gradient exceed 1:12" is debateable as there is indeed a gradient exceedance of 1:12 present,[6] albeit on a straight sloping section of road. Moreover, their assertion that the MfGS does not mandate the calculation of average gradients within vertical curves is a point also open to debate.[7]

It's indisputable and a simple fact that slopes within vertical curves cannot be ignored as they must be traversed by all users. They are slopes, and thus have gradient whether taken as a whole or in elements.

As conditioned, maximum gradients of 1:20 should be the general aim for roads and footways around the site, with exceedances, up to 1:12 for lengths of no more than 30m. This was the outcome of the appeal, and these were the limits imposed by the Inspector to make the scheme acceptable.

Pedestrians primarily seek assurance that a route is safe, comfortable, and aligns with their individual abilities, as do cyclists or those with protected characteristics.

The ultimate question is whether the route is physically manageable or too challenging, potentially leading individuals to stay at home or if available opt for using their cars.

Although the applicant is claiming that developing a scheme in accordance with the approved outline criteria, and in substantial alignment with parameter plans was never achievable without significant intervention,[8] this doesn't warrant changing the condition to accommodate their plan. Our viewpoint is that an access road and footpath arrangement can be devised to meet gradient standards and uphold compliance with the parameter plans, and other requirements. However, this is dependent on the applicant recognizing that approval was granted for a scheme of **up to** 250 houses.

[6] Between 765.411m and 790m a c25m section is shown as 8.6% this is equal to 1:11.6 and not the claimed 1:12. Exceeding the maximum gradient. See Fig. 3 below.
[7] MfGS pg.30. “Vertical Alignment**:** The Developer must consider the following when designing **vertical curves** on new developments…” We view that this section of MfGS is relevant to all vertical Alignment.
[8] Documents tab, Applicant - additional supporting information. Email from applicant to Planning Officer, 5 Mar, 24 10:10 para.2. Annex C

Latest Proposed Amendment to the wording of Planning Condition 13.

The applicant's proposal to revise the condition was to remove perceived ambiguity and therefore enhance clarity. It is now generally agreed, by all non-applicant parties, that the condition's wording is clear and unambiguous and therefore does not require amendment. This point alone is sufficient reason to recommend refusal of the application.

The latest proposed revision seems to now have a dual purpose. Firstly, to enhance clarity and precision in the condition and secondly, to align the condition with the MfGS. [9]

Dealing with these points in turn.

1. It is acknowledged, except by the applicant, that the existing Condition 13 is clear, unambiguous, and precise. There is therefore no necessity for an amendment in this respect.
2. The formulation of the existing condition was specifically designed to remove the necessity of consulting the Manual for Gloucestershire Streets (MfGS), which lacks the desired clarity as highlighted by the GCC during the appeal process. By ensuring precision and clarity, the current Condition 13, effectively addresses any ambiguity concerning the management of gradients ranging from 1:20 to 1:12. This rationale was thoroughly established in our Initial Response, emphasizing the deliberate distancing from the MfGS due to its inherent lack of clarity.

It is our view, that the newly proposed suggestion, much like its predecessor, would once again cloud the issue regarding clarity and precision and would add unnecessary complication. The existing Condition 13 is straightforward, objective, and independent. Conversely, the newly proposed wording would introduce ambiguity and reliance on subjective factors, which is contrary to what was deemed necessary by the Inspector and GCC, and why the condition is written as it is. See our Initial Response.

We also observe in the latest proposed condition, the inclusion of considerations such as safety, landscape features, topography, and amenity. However, these elements are unnecessary in this gradient's condition for several reasons:

1. They overcomplicate the condition, leading to the aforementioned imprecision and ambiguity.
2. The current condition already has regard to safe and suitable access for all users, prioritising highway safety.
3. Concerns about design, character, and appearance in the Area of Outstanding Natural Beauty (AONB) and neighbouring land users are adequately addressed in the previously highlighted Masterplan, as well as Conditions 5 & 26 and the Building Heights and Green Infrastructure Parameter Plans.[10]
4. Therefore, reiterating these concerns in a gradient condition is not only redundant, but serves to add complexity, complication, and uncertainty.

Moreover, when the Inspector applied his gradient condition in the manner he did, it was with the clear understanding that he was simultaneously safeguarding other elements, such as landscape, future ground levels and TPO'd trees, through additional associated conditions.

[9] Planning Officers report to committee. Para.6.62.
[10] See Annexes A & B.

Thus, a condition as convoluted as the one now proposed is unnecessary, as all its aspects are already adequately addressed.

Conclusion.

In his determination, the Inspector applied the tilted balance and concluded that the appeal could be granted, contingent upon the imposition of several conditions, including Condition 13.

The Inspector emphasized that **"...the requirement of the condition is fundamental to make the scheme acceptable..."** Implicit in this statement is the understanding that the appeal would have been unsuccessful without a gradient condition as currently formulated. It should not be permissible to modify conditions to accommodate development proposals and then reassess the balance to achieve the desired outcome for applicants. (Our bold)

The balancing exercise has already been conducted, and the conditions have been established. It is imperative to work within these parameters.

The present circumstances, though unfortunate, result solely from an oversight in recognizing and acknowledging the explicit details within a planning condition. No individual party holds greater responsibility than another in this regard. Nonetheless, it is imperative to prevent the burden of liability from impacting both current and future residents of the proposed development, as well as Cheltenham as a whole, by permitting an unsuitable road design.

The most sustainable approach is to reevaluate the design with a now comprehensive understanding of all conditions and parameter plans, encompassing the Green Infrastructure and Building Heights plans. This will facilitate the creation of an equally customized and carefully planned scheme as initially envisioned, while ensuring the protection or preservation of all previously identified features and amenities and addressing all site restrictions and intricacies.

Undoubtedly, there will be challenges in advancing this scheme. However, many of these issues are surmountable, especially when considering that it is a scheme for **up to** 250 dwellings. The appellants at the Inquiry expressed confidence in the feasibility of the proposed scheme at that time. Additionally, this applicant has not provided explicit evidence as to why a lower number of dwellings cannot be accommodated.

The Highway Authority acknowledges that the gradient condition has not been fulfilled. However, they appear to sympathetically acknowledge compliance with the MfGS, as an acceptable alternative, which, in reality, has little bearing on the matter at hand. Nevertheless, they are minded to note that: "This is clearly not what the MfGS and National Guidance are seeking to achieve, which promotes designs that do not disadvantage users with restricted mobility." And "...that pedestrians should be considered first, and development should meet the needs of those with protected characteristics..."

Finally, the wording of Condition 13 should remain unchanged. It is robust, succinct, unambiguous, precise, and its objective is clear. The Inspector applied it with a comprehensive grasp of its implications and its relevance to the landscape, acknowledging that without it, the appeal would have failed. The acceptability of the proposed development at Oakley Farm hinges on the inclusion of Condition 13, among the other supportive conditions.

The application to change the wording of Condition 13 should be refused.

Technical Detail.

Gradient Evidence.

Figures 1 & 2 shown below, highlight 4 zones where the gradients are non-compliant with condition 13.

Zone A: Road section, 40m in length with an average gradient of 7.5% or 1:13.3

Zone B: Road section, 270m in length with an average gradient of 7.41% or 1:13.5

Zone C: Road section, 150m in length with an average gradient of 7.03% or 1:14

Zone D: Road section, 40m in length with a gradient of 8.33% or 1:12. Within the 40m section is a 24.5m length with a gradient of 8.62% or 1:11.6. Also, non-compliant with MfGS.

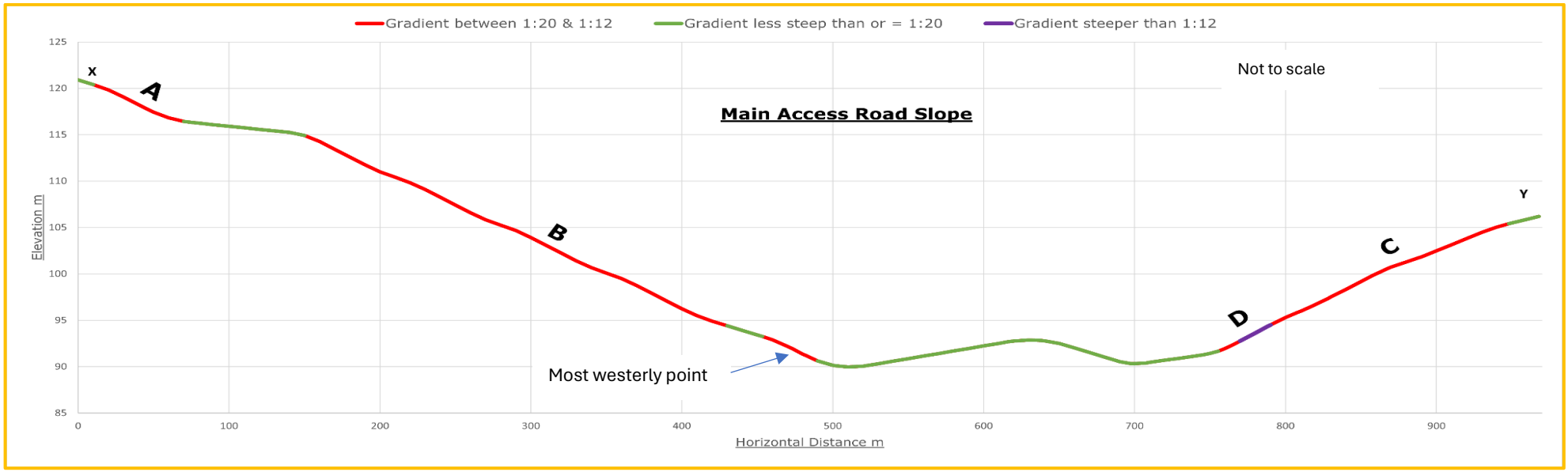


Fig 1. Main Access Road Vertical section

Figure 1 depicts the main access road as a vertical cross-section spanning 968m from point X, Harp Hill Access, to point Y, adjacent to plot 215. The road's elevation begins at approximately 121m, descending to 90m elevation at its western end where it curves around a solitary Oak tree before turning east and continuing for approximately 250m. It then ascends a further 200m to reach an elevation of 106m at the road's end.

In the diagram:

- Green sections represent road segments compliant with Condition 13.
- Red sections indicate road segments with gradients between 1:20 and 1:12, extending for more than 30m, thus non-compliant with Condition 13.
- Purple sections denote road segments where the gradient exceeds 1:12, also rendering them non-compliant with Condition 13 and MfGS

Approximately 56% of the road's total length surpasses the conditioned maximum gradient of 1:20, while 20% of the road features a gradient of 1:12.

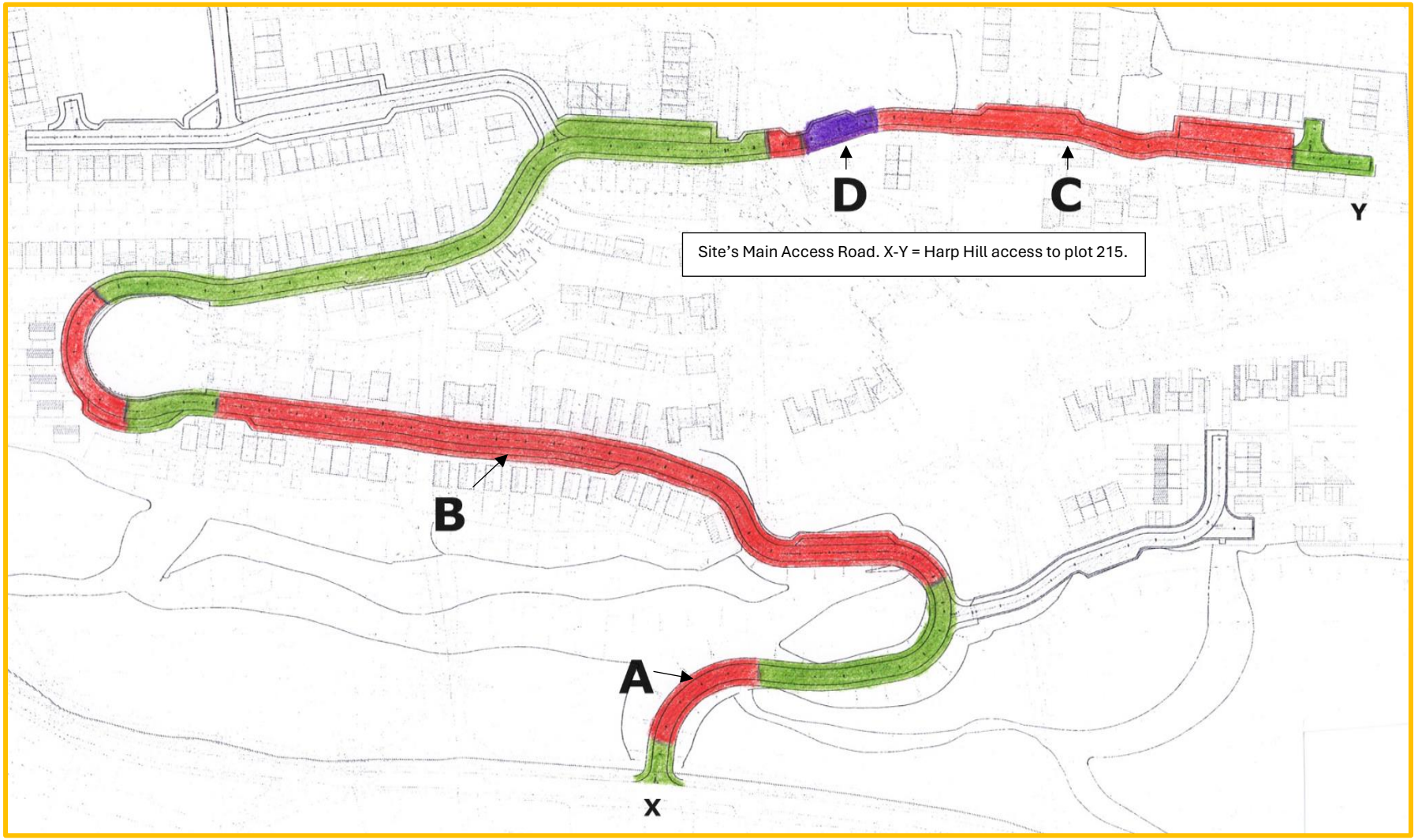


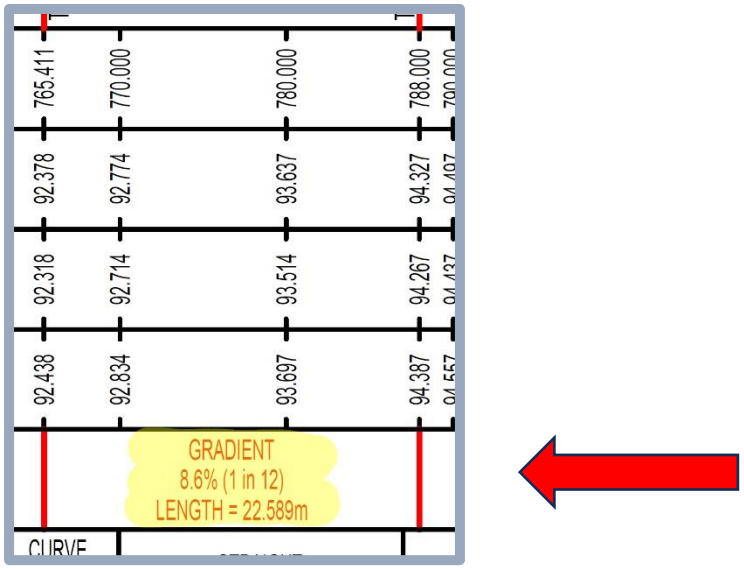
Fig. 2. Main Access Road Horizontal layout.

Road divided into zones corresponding to those shown in as fig. 1

Fig. 3 below.

Taken from the applicant's Access Strategy Longitudinal Sections diagram, this segment demonstrates further non-compliance with Condition 13. The depicted area corresponds to what we've identified as zone D. It presents a road section measuring 22.589 meters in length, featuring a gradient noted as 8.6% (1:12). However, when properly converted without rounding, 8.6% equates to 1:11.63. Zone D surpasses the prescribed 1:12 (8.33%) maximum stipulated by the condition. Furthermore, there's an argument for the overall non-compliance of Zone D due to its total length of 40 meters at an average gradient of 8.33% or 1:12. Detailed figures for Zone D are outlined in Table 1 below. Notably, Zone D also fails to comply with the MfGS standards.

Fig. 3. Extract of "Zone D" detail from Applicant's Longitudinal Section Drawing. Evidence of non-compliance with both Condition 13 and MfGS.



Gradient above should read: 8.6% (1:11.6)

Table 1. Zone D Detail.

Start Dist	End Dist	Dist Chg	Start Elev	End Elev	Elev Chg	Gradient	Gradient
760	765.411	5.411	91.957	92.378	0.421	**7.78%**	**1:12.9**
765.411	770	4.589	92.378	92.774	0.396	**8.63%**	**1:11.6**
770	780	10	92.774	93.637	0.863	**8.63%**	**1:11.6**
780	788	8	93.637	94.327	0.69	**8.62%**	**1:11.6**
788	790	2	94.327	94.497	0.17	**8.50%**	**1:11.8**
790	798	8	94.497	95.139	0.642	**8.02%**	**1:12.5**
798	800	2	95.139	95.289	0.15	**7.50%**	**1:13.3**

Evidence of non-compliance with both Condition 13 and MfGS. Average gradient between760m-800m of 8.33% (1:12) for 40m within which 25m at 8.6% (1:11.6).

We acknowledge use of the appellant's and applicant's data and drawings.

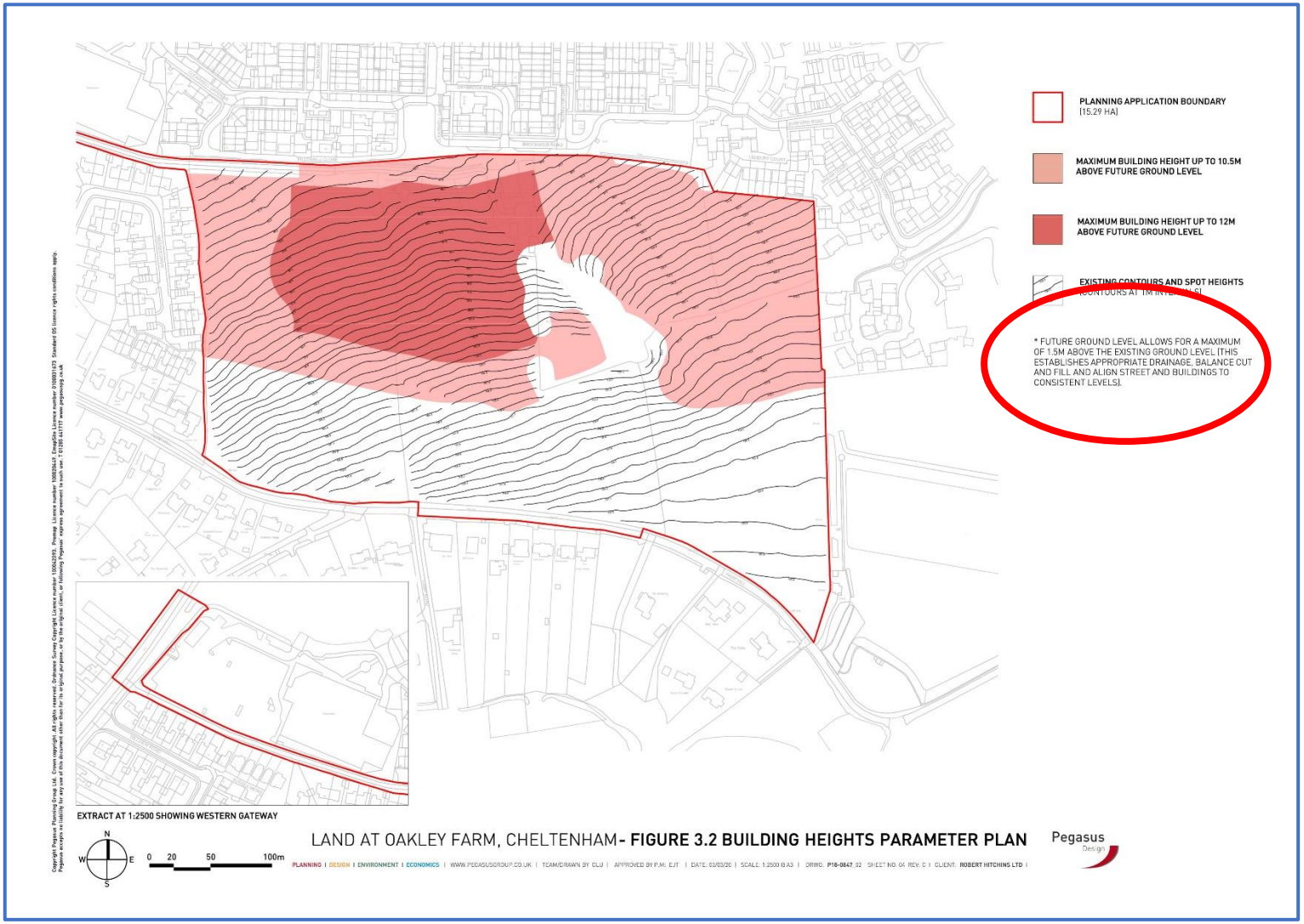
Annexes:

Annex A Building Heights Parameter Plan.

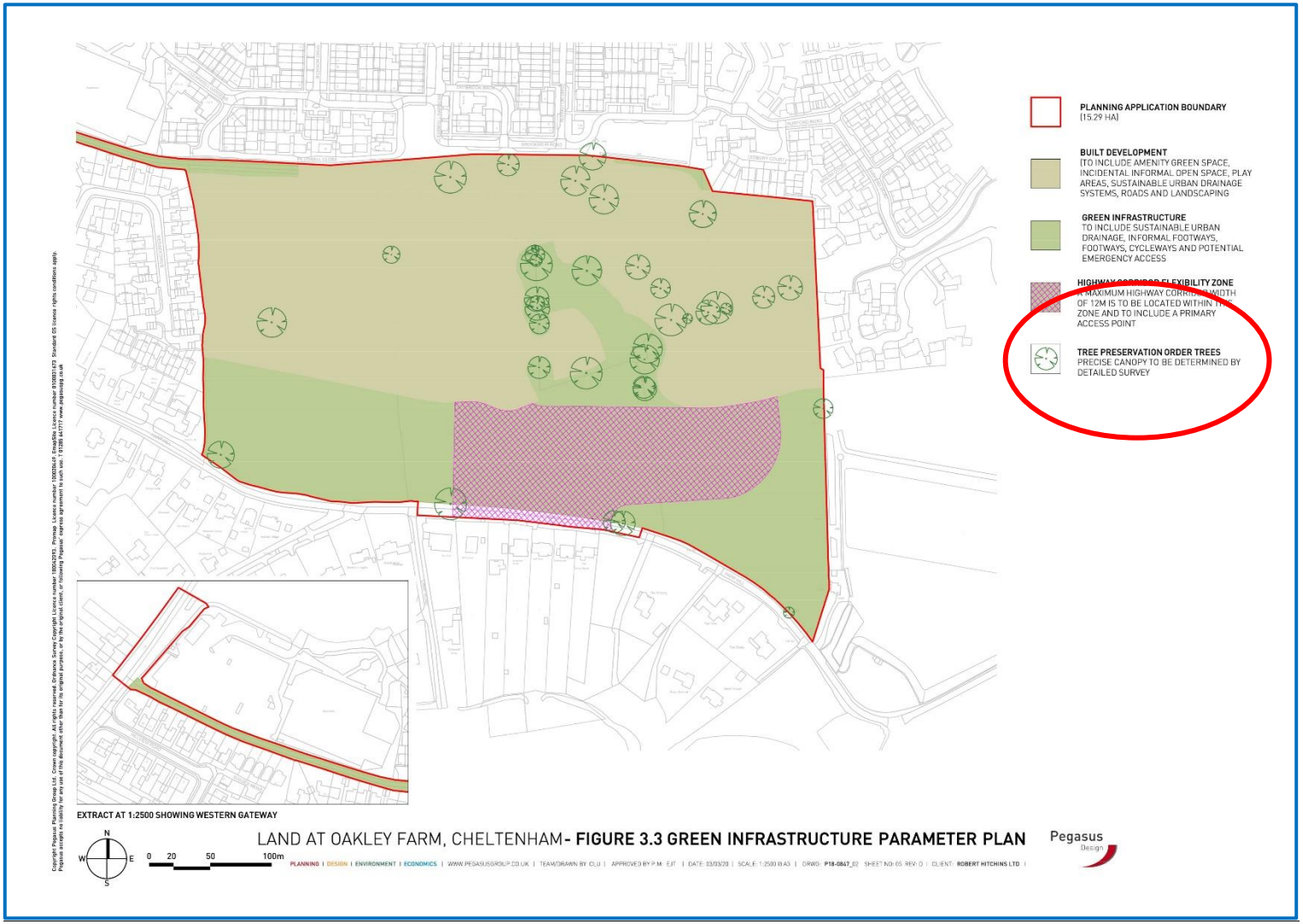
Annex B Green Infrastructure Parameter Plan.

Annex C email. Applicant – Planning Officer.

Annex A Building Heights Parameter Plan.



Annex B Green Infrastructure Parameter Plan.



Annex C

From: Tony Clements
Sent: Tue, 5 Mar 2024 10:10:00 +0000
To: Lucy White
Cc: Rob Stroud;Robert Derricott;Nigel Lush
Subject: Oakley Farm - Gradients
Attachments: PJS22-068-DR-002 - Alternative Masterplan Road Levels and Interfacing.pdf

Hi Lucy

Further to our earlier discussion I had a Teams meeting with Vistry/PJS earlier and can advise:

1. Vertical Curve Sections (Green) – at no point within any of the vertical curve sections does the gradient exceed 1:12. As explained there is nothing in MfGS that would require calculation of an average linear gradient across these sections.

2. Revised Illustrative Masterplan – we have not designed this road in detail in full (to include all of the various off shoot culs de sac and parking areas etc) but PJS carried out some assessment/appraisal work in early 2023 when Vistry acquired the site to assess the feasibility of following the masterplan and the main access routes through the site – you will recall it was discussed at the initial pre-app meeting in March, and subsequently when Nash were appointed as masterplanners. PJS established that the layout shown on the Revised Illustrative Masterplan (RIM) was not deliverable without adopting a strategy that would have required significant engineering interventions to raise the level of the site in parts, the result of which would have been removal of a large number of the TPO trees and much greater prominence of a number of the dwellings as shown on the plan. The corollary of this would be a much greater incidence of overlooking than would occur for the proposed RM scheme. The clearest illustrations of this occur along the eastern road section, which runs towards the boundary with the listed reservoir and the adjoining dwellings. A cul de sac is shown extending to the west from this section of the road, towards the area we have called The Glade. The edge of carriageway at this point is some 5m higher than the ground level of the TPO trees to the west at the end of the cul de sac. To achieve an acceptable MfGS gradient (no greater than 1:12) from the carriageway edge to the end of the cul de sac and the garages shown would mean that the end of the cul de sac would be c.3m above the bole of the adjacent tree. This would require provision of a large retaining structure within the RPZ of this tree, and the adjoining trees that would cause their failure/removal. The significant TPO tree located to the west, around which we have designed the access road and created the oak tree neighbourhood, would sit around 3-4m below the end of the carriageway shown on the RIM drawing. A parking area for the adjoining apartment block (?) would need to be accessed from here. To achieve the level change to comply with MfGS would also require a retaining structure to be built within the RPZ, also causing this tree to fail. The northern spur of the eastern access road on the RIM would also need to be constructed at a level approximately 4.5 – 5.0m above the prevailing ground level to ensure that the gradients required by MfGS could be achieved. This would necessitate provision of a very large embankment/retaining feature.

3. Therefore, while it would theoretically be possible to design the main carriageways

shown on the RIM to conform to MfGS (in the same way that the submitted scheme achieves conformity with MfGS) the implications would be significant:

a. Significant loss of TPO trees across the site due to the requirement for retaining structures within RPZ and excavation within RPZ

b. Significantly raised sections of carriageway above prevailing ground levels creating a significant level change (c.5.0m) between the edge of carriageway/top of embankment and the adjoining ground levels close to the northern site margins.

c. Pronounced/raised dwelling slab levels for dwellings accessed from the eastern road spur resulting in much greater visual prominence and greater potential for overlooking/overbearing impacts.

4. In short, while it would be possible to design the main routes to achieve the gradients that would satisfy MfGS the concomitant effects would be hugely damaging. The RIM was a theoretical paper exercise that demonstrated compliance with MfGS for the road infrastructure; it did not give detailed attention to the impacts arising from the provision of dwellings accessed from the roads, which would be far more harmful in respect of the prevailing character of the site than the RM scheme.

I attach a copy of the feasibility drawing prepared by PJS initially that informed the design process. Reference to the spot heights and the prevailing contours provides an illustration of the points outlined above. The large gold/yellow stars indicated are a feature of the RIM (not the engineering drawing) and relate to 'natural play areas'.

Anticipating that you may be asked about numbers of dwellings on the site – ie would a reduction in the number allow for a different and shallower profile for the access roads? Our advice is that the configuration of the road is not affected particularly by the dwelling numbers, it is a product of the topography. Therefore cutting the number of dwellings, within the parameters of the decision, would not make a material difference to the road gradients.

We firmly believe, as evidenced by the highly collaborative design process undertaken between March and December 2023 under the terms of the PPA, that the proposed arrangement is the best solution. The RM scheme as designed is a far more considered, sympathetic, and responsive design than the illustrative proposals that are shown on the RIM.

I hope that this addresses the relevant matters. If it would be useful to meet with yourself and GCC to explain/discuss the above we would be happy to do so.

Regards
Tony
Tony