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## LAND AT OAKLEY FARM, CHELTENHAM, NEW RESIDENTIAL DEVELOPMENT

Tuesday 5th September 2023, Cheltenham Borough Council Offices

### Presenters

Amanda Taylor – Nash Partnership

Tony Clements – Nexus Planning

Nigel Lush – Vistry Cotswolds

Kevin Charsley – IDP

### Design Review Panel

Toby Coombes – CE Architects – Chair

Ross Sharpe – Yiangou Architects

Charles Cox – Sutton Cox Architects

Nick Harman – Rappor – Landscape Architect

Helen McHollan – EDP – Landscape Architect

Emma Williams – Design Panel Administrator

### Planning Officer

Lucy White – Cheltenham Borough Council

### Context of the Development

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The Review meeting was held to discuss the emerging masterplan for the Land at Oakley Farm following the approval of an outline planning permission

The site is greenfield and set within the Cotswold area of outstanding natural beauty (AONB). It has steep slopes falling to the North and a mix of existing trees and hedges scattered both through the site and to the boundaries. The location within the AONB sets a high bar for the visual impact of the development but this setting is not perceived as open landscape, with the site being surrounded on the North, West and South by residential properties. The only green link is to the Eastern boundary which is a Listed underground reservoir.

The scheme was approved at appeal following refusal by the Local authority. The inspector highlighted there is a local housing land supply shortfall, so on balance, the contained characteristics of the site and its greater relationship to the adjacent residential areas and the topography of the site overcame the restrictions of the AONB and the outline planning permission was granted for 250 units.

### Presentation

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The panel felt the clarity and explanation of the presentation was high quality and allowed a good understanding and therefore review of the proposals. The presentation was based on the PPA3: Emerging Masterplan and Character document dated August 2023. The presentation talked through the scheme and how it had evolved into its current form. The proposals were based on the following principles:

- It was agreed that the site was unusual for the AONB with 3 sides being enclosed by residential development. The outline had addressed the visual impact by locating the development on the lower slopes and maintaining a landscape margin along Harp Hill.
- Although the site is large the proposed densities of the site are closer to a standard developable area (40 dwellings/hectare) when you discount the green spaces and take account of the site topography.
- The natural setting and topography allow amazing landscape views out of the site but will equally mean the site is visible from long range viewpoints.
- The site needs to maximise the scale of development in the outline approval to allow the

quality of the proposals to be viable. This sets the thresholds at 250 dwellings with 40% affordable housing scattered through the site.

- The topography means the site access road meanders through the site but this is viewed as a positive as it allows a journey through the character areas.
- The breaking up of the site into various character zones or neighbourhoods allows some variation in materials which if completed sympathetically could provide a high-quality solution.
- The houses are designed to provide the necessary on site terracing with both 'stepping up' and 'stepping down houses'. This was to avoid large sections of stand alone retaining walls.
- The intention is to retain the majority of the on site trees and hedgerows.
- Aesthetically the houses are contemporary in form with some reference to historic window proportions and scale. Materials will be high quality with a mix of stone, render and timber to reflect the emerging character areas.
- The project proposes sustainable drainage with the provision of 2 basins and supplemented by below ground attenuation to the bottom (North) of the site.
- The integration of pedestrian links and play spaces are important and are scattered through the site.
- The presenters discussed 'building with nature' and how the principals of this were integrated through the site. This is really down to the retention of the existing trees and hedgerows and the creation on pockets of soft landscape through the scheme.

## Design Panel Comments

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### Layout

The principle of the layout reflected the masterplan approved as part the appeal. The main questions on this are the visual impact of the new access road on the Harp Hill and how this crosses the landscape margin. However, it was agreed that the lower sections of the site are much closer in character to the Northern residential than the open landscape. This means the proposed layout responds positively to the landscape setting.

The proposals to design bespoke dwellings which deal with the changes in levels across the site is a good solution and reduces the need for large retaining walls. The 'gaps' between buildings do also need a sensitive response and will impact on the success of the scheme, the nature of the retaining features that will exist in these locations should be fully considered and respond positively to the different character areas of the proposed development.

The nature of the open spaces and their landscape planting is a positive as are the stepped play spaces through the site which will provide a much softer and more interactive solution. Questions were raised on the maintenance of these as there will be works and monies, required to ensure the longevity of the public realm.

The relocation of the allotment to the eastern boundary was also felt to be an improvement from the earlier proposals.

### Connectivity

The principle vehicle access from Harp Hill raised concerns on visual impact as the winding road cuts through the retained green space and will be highly visible from distant views. The lack of highway footway on either side of Harp Hill, was also a concern – however the principals of this were agreed at outline and therefore not appropriate to labour these issues as part of the review at this stage. It was felt the visual impact of the elevated entrance portion would benefit from further review and landscape screening from long range views. Concern as to how the levels physically work with the drainage pond, pedestrian and cycle crossings also needs more consideration. Although pedestrian and cycle routes are provided through the site we would like to see better links into the surrounding areas to connect the site into its locality. This has been suggested as an option to the East but links to the retail centre to the North and the Schools across Harp Hill to the South should be considered to reduce vehicle movements.

### Landscape Design

The retention of the majority of trees and hedges on the site is positive and provides benefit in both initial maturity and breaking down the visual impact as well as ecology. This, coupled with additional tree planting will help to improve the nature and quality of the development. However, the new tree belt separating the built up areas to those along Harp Hill, appears

to be creating layout issues around the retained oak tree. We understand the line of the planting was established at outline and that the line of development has been kept consistent with that of the outline planning permission parameter plans. However, this line does not reflect the contours of the Site and we would suggest amending this line to provide a more natural curved tree belt. This would allow more space around the tree and not be detrimental to the overall design. In addition, it would afford additional space within the proposed development parcel to accommodate more meaningful street trees and also allow for improved garden layouts to the properties on the edge of the development parcel.

The hedge running North - South to the West of the site is shown to be retained, but it was felt to be unrealistic given the proximity to the housing and the stepped nature of the buildings. It is uncertain how the changes to existing levels adjacent to the hedges will impact on them? The 1m either side of the hedge was very inadequate in terms of maintenance access. If the hedge is to be retained more space must be given and necessary method statements for its retention during the construction period provided.

The nature of the street trees was also discussed, and the panel were unconvinced that adequate space was provided for rooting volume or to allow decent canopy trees. Providing more space for these would be of benefit to break up the massing of the development going up the slope when viewed from the AONB and Cheltenham to the North and to enhance the quality feel of the development. Indeed the masterplan shown at outline, had significantly more street trees indicated. Trees shown to rear gardens, were felt unlikely to provide any visual contribution to the wider setting, given that their retention cannot be guaranteed and their nature was more likely to be of a smaller fruiting tree variety; however they were a welcome addition for home owners

The intent of the images presented for the open spaces and play areas was welcomed and it was felt it could provide a real benefit to the area but it needs to turn into reality for the success of the scheme.

Biodiversity Net Gain was mentioned but there was no evidence of a baseline or proposed strategy / assessment presented.

## Drainage Strategies

A more integrated response to the sustainable drainage strategy (SuDS) would be preferred, and it was disappointing that there was no source control indicated and that much of attenuation volume was through underground tanks located to the bottom of the site. There are green areas through the site which could be included or the provision of on street / on plot rain gardens, permeable parking areas, swales incorporated into soft landscape or play areas, etc. The principles need to be developed and a more holistic approach to the drainage design established to provide more source control and interception of everyday rainfall as part of a fully integrated management train throughout the site rather than an end of pipe solution.

## Massing and Unit Layout

The proposals included some interesting proposals on unit plans, sections and massing which we believe overcomes the sloping nature of the site in a positive manner. Questions were raised as to how level changes were dealt with between the buildings and this requires further development.

A question / option was raised as to the roof forms of the apartment buildings. These appear to step down the site and therefore their plan form is more broken down. With regards to elevations we felt the top floor mansard adds more animation and interest to this rather than a straight 3 storeys with parapet walls.

## Aesthetics

A contemporary approach is preferred rather than a pastiche, with the presented research on Cheltenham aesthetics being reflected in the suggestion of a grounded base course and the fragmented design caused by its developer origins adds the potential for further diversity reflected in the variety in building forms provided a mix through the site.

However, the use of the Regency precedent for proportions has created some elevations where the balance of horizontal and vertical is slightly awkward. As the housing types are bespoke to this site, the approach to proportioning could similarly be unique to the setting.

How the houses deal with the sloping nature of the site is also positive and will allow variety in designs. This will provide multiple long-range views out of the site which can also only be a positive. The narrow vertical dwellings, with space between to allow level changes creates its own vernacular.

Generally, the suggested materials, brick, stone, render appear suitable although there was some debate about the use of timber cladding in the more verdant settings. There is no consensus on this so it will be down to the quality and nature of its use.

The massing and designs, coupled with the suggested materials, provides the potential for an interesting scheme. The aesthetics of the apartment blocks benefit from the mansard roofs as this adds vertical interest to the designs and also serves to further justify the character areas.

## Sustainability

The suggestion that the site will be 'better than building regulations' and discussions on fabric first over on site energy generation were positive although in our experience some energy generation and battery storage will be required for a scheme which could be built out over the next few years. ASHP use electricity and can become an expensive way to provide heating and hot water. The incorporation of working from home, cycle storage, electric vehicle charging, etc is a minimum for all plots not just to be considered in some cases.

## Summary

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The scheme was well presented and includes some interesting design responses to what could be a difficult site. We have raised several questions through the commentary but in principle we believe this is a well designed development of the principals agreed at outline; which with some further exploration around green blue infrastructure could be further integrated into the wider setting and provide a more exemplar development suitable for its location within the AONB. The key to its success will be in the detail; this runs across the whole proposal from landscape, integration into the local context, high quality materials, detailing, sustainability, drainage and quality of construction.

We do however view this as a positive starting point.

**Housing Enabling Comments- Oakley Farm, 23/01691/REM.**

**Summary of Housing Enabling Comments:**

In summary, the proposed scheme generally accords with relevant policy requirements, as set out within JCS Policies SD4, SD11 and SD12 respectively. The types and tenures provided (see the proposed AH mix table) are reflective of local housing need delivering 32 x social rented homes, 38 x affordable rented homes, and 30 shared ownership units, in addition to including 56 x affordable M4(2) level access affordable homes and 2 x M4(3)(2)(b) wheelchair accessible affordable homes.

The scheme proposals have been agreed following extensive consultation between this officer, Vistry and Stonewater.

Whilst certain elements of the site could benefit from amendments to better reflect policy requirements (as described within the [Clustering and Distribution](#) and [Wheelchair Accessible Homes](#) sections), it is nevertheless recognised that the context of this scheme (located on steeply sloping land), combined with the unique neighbourhood characteristics means that additional scheme amendments, specifically relating to the relocation of the 4 & 5 bedroom affordable homes and 2 x 1b2p Wheelchair Accessible Homes are not feasible.

Accordingly, this officer is supportive of the affordable housing proposals for this scheme.

**Level of Affordable Housing Provision:**

The Joint Core Strategy Policy SD12: Affordable Housing states that “on sites of 11 dwellings or more... a minimum of 40% affordable housing will be sought in Cheltenham Borough”. The affordable housing requirement found in the JCS has been superseded by the latest NPPF, which requires that schemes of 10 dwellings or more should deliver affordable housing.

This application is comprised of 250 residential units. Therefore at 40% provision in line with JCS Policy SD12: Affordable Housing the Council will seek 100 affordable homes on this scheme.

**Affordable Housing Mix:**

Having regard to local needs, community cohesion and affordability considerations, and following on from pre-application discussions and subsequent discussions relating to this reserved matters application in consultation with the applicant, the following mix of affordable dwellings will be sought on a policy compliant site (see table below):

**Proposed Affordable Housing Mix Table:**

Tenure & House Type (100 units, 40% affordable)	Social Rent	Affordable Rent	Shared Ownership	Totals:	%
1b2p GF Maisonette, M4(2) Cat 2, 50m2	9			9	9%
1b2p UF Maisonette, 50m2	9			9	9%
1b2p Bungalow M4(3)(2)(b), 60m2	2			2	2%
1b2p Bungalow M4(2) Cat 2, 50m2	4			4	4%
2b4p House, 71m2			14	14	14%
2b4p House, M4(2) Cat 2, 79m2		12	4	16	16%
2b4p GF Maisonette M4(2) Cat 2, 71m2		4		4	4%
2b4p Flats M4(2) Cat 2, 71m2		6		6	6%
3b5p House, 83m2		6	8	14	14%
3b5p House, M4(2) Cat 2, 93m2		6		6	6%
3b6p House		4	4	8	8%
4b7p House, 108m2	6			6	6%
5b8p House, 121m2, M4(2)	2			2	2%
<b>Totals</b>	<b>32</b>	<b>38</b>	<b>30</b>	<b>100</b>	
<b>%</b>	<b>32%</b>	<b>38%</b>	<b>30%</b>		

**Viability:**

JCS Policy SD12 states that where the viability of development impacts upon delivery of the full affordable housing requirement, developers should consider:

- Varying the housing mix and design of the scheme in order to reduce costs whilst having regard to the requirements of other policies in the plan... and the objective of creating a balanced housing market.
- Securing public subsidy or other commuted sums to assist delivery of affordable housing.

If a development cannot deliver the full affordable housing requirement, a viability assessment conforming to an agreed methodology, in accordance with Policy INF7 will be required. Viability assessments will be independently appraised at the expense of the applicant. It is expected that any

such assessment will be published in full prior to determination for all non-policy compliant schemes except in exceptional circumstances.

The council considers that information submitted as a part of, and in support if a viability assessment should be treated transparently and be available for wider scrutiny. In submitting information, applicants should be aware that this will be made publicly available. Further clarification around the viability process that Cheltenham Borough Council will follow in exceptional circumstances can be found in JCS Policy SD12.

In exceptional circumstances, where it is agreed that it is not possible to deliver 40% affordable housing on site due to viability issues, the council will build a viability review mechanism into the Section 106 agreement. This would likely take place within 2 years of the date of the last viability review.

### **Dwelling Mix and Tenure:**

Our adopted policy JCS Policy SD11: Housing Mix and Standards states that: - “Housing development will be required to provide an appropriate mix of dwelling sizes types and tenures in order to contribute to mixed and balanced communities”, before continuing to require that new development should: “address the needs of the local area...as set out in the local housing evidence base, including the most up-to-date SHMA”.

To facilitate a mixed and balanced community in this location, this officer will seek a range of 1-5 bedroom affordable homes including a diverse mix of Social Rent, Affordable Rent and Shared Ownership homes, as detailed under the [Affordable Housing Mix table](#), above. The proposed affordable housing mix has been informed by the latest evidence bases of affordable housing need, including the Housing Register, Local Housing Needs Assessment and past and future projected affordable housing delivery.

This officer has begun conversations with Stonewater (Vistry’s chosen Registered Provider partner) about the potential for the site to deliver a small element of additionality, likely through a small proportion of additional Shared Ownership units above and beyond the Section 106 requirement, supported via Homes England grant funding (subject to Homes England approval, and sign off by Vistry and Stonewater).

The units proposed as additionality (subject to approvals and agreements from the relevant parties) will be agreed in due course, being mindful of community cohesion.

### **Affordable Housing Scheme: Registered Provider (RP) Feedback**

To inform the proposed affordable housing scheme, feedback was sought from Stonewater (Vistry’s chosen RP partner), who have submitted this application jointly with Vistry Homes, with the Housing Enabling Officer meeting with Stonewater on 21/11/2023 to discuss outstanding issues. Stonewater were generally happy with the provision of affordable housing on this scheme, which did not raise any significant community cohesion issues from their perspective. Stonewater’s responses to the two outstanding issues (clustering of 4 and 5 bedroom homes and

## **Rents:**

JCS Policy SD11 requires that new developments must address identified local housing needs, as set out in the local housing evidence base. Additionally, JCS Policy SD12: Affordable Housing states that “provision should be made... to ensure that housing will remain at an affordable price for future eligible households”.

Considering identified housing needs, [The 2020 Gloucestershire LHNA](#) finds that Cheltenham Borough should deliver 1,510 new rented homes between 2021-2041, of which 1,325 (88% of rented need) should be social rented homes.<sup>1</sup> By delivering social rented homes, the Council is thereby delivering against identified housing needs and simultaneously meeting our policy position set out within JCS Policy SD11.

In this officer’s view, the most effective way to- “ensure that (affordable housing) will remain at an affordable price for future eligible households” as per JCS Policy SD12: Affordable Housing, is to deliver the rented element at wholly social rented levels. This approach is justified as the calculation of social rents is informed by local house prices and local incomes, and thus are inherently affordable by design.

Additionally, this officer will aim to ensure that the Affordable Rented homes are capped in line with Local Housing Allowance (LHA) levels. This approach will help to mitigate the potential issue of rising rents associated with Affordable Rented properties which, over time, could place tenants in housing stress if appropriate safeguards are not put into place.

It is notable that Homes England has also designated Cheltenham Borough as an area of [high affordability pressure](#), meaning that the difference between the average social rents and private rents is £50 per week or more, further underlining the importance of delivering social rented homes to address acute existing affordability issues within the Borough.

Social Rents should comply with the Government’s [December 2022 Direction on the rent standard 2023](#), in addition to the Government’s December 2022 [‘Policy statement on rents for social housing’](#) as updated from time-to-time.

The Council’s affordable housing mix seeks the delivery of 70% (70) of the affordable housing requirement through rented tenures, with 32% (32) of the affordable homes being delivered via social rent levels and the remaining 38% (38) being delivered at affordable rents, in reflection of identified housing needs and affordability issues. This is reflective of discussions between the Housing Enabling Officer and the applicant, which have informed the proposed tenure mix.

## **Service Charges:**

Any service charges on the affordable dwellings should be eligible for and fully covered by Housing Benefit.

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<sup>1</sup> Opinion Research Services (ORS), ‘2020 Gloucestershire Local Housing Needs Assessment’, (September 2020) p. 155.



The Council recognises that social rented charges are set through the national rent regime, with rents being exclusive of any service charges. It is crucial, therefore, that service charges should be kept to a minimum. Following pre-application discussions leading up to this application, this officer can confirm that service charges for tenants have been minimised through the scheme design.

### **Clustering and Distribution:**

In terms of clustering and distribution, JCS Policy SD12: Affordable Housing clarifies that new development should ensure that affordable housing is “seamlessly integrated and distributed throughout the development scheme”.

The latest planning layout submitted with this application (Site Layout 23044-1002, P1, dated 03/10/2023) indicates that the affordable homes (coloured in orange) will be seamlessly distributed throughout the development scheme, being found in small clusters (with the maximum cluster size being 12 units). This approach, which was agreed following extensive consultation between the applicant and this officer, meets the policy requirements set out within JCS Policy SD12: Affordable Housing in terms of the distribution and clustering of affordable homes.

Additionally, The [National Model Design Guide](#) (NDG) emphasises that new development should be ‘socially inclusive’. In practice, this means that the applicant should aim to maximise the potential for social integration between affordable and market residents through the distribution of the affordable homes throughout the scheme. The NDG proceeds to state that: “(good design) avoids features that could create actual or perceived barriers, or contribute to segregation, both within the development and with its surroundings”.<sup>2</sup>

The proposed planning layout (Site Layout 23044-1002, P1, dated 03/10/2023) also complies with the best practice outlined within the National Model Design Guide, with social integration being achieved on this scheme through the even and seamless distribution of affordable homes throughout the development, which has been balanced against the need to deliver level access affordable homes. In this officers’ view, the affordable homes are not located in disadvantageous locations that could contribute to ‘actual or perceived barriers or contribute to segregation’ between market and affordable residents. To the contrary, the location of certain clusters of affordable homes (e.g., plots 136-141, 125-135 and plots 168-171) directly overlook the SUDS pond, providing the affordable residents with an attractive outlook onto landscaped areas of the scheme. In summary, therefore, this officer is satisfied that the clustering and distribution of the affordable homes indicated on the proposed planning layout (Site Layout 23044-1002, P1, dated 03/10/2023) complies with JCS Policy SD12: Affordable Housing and relevant guidance within the National Model Design Guide.

Notwithstanding these points, in this Officer’s view, the location of the 4 bedroom (Plots 35, 36,37 and 48,49 and 50) and 5 bedroom (Plots 34 & 47) affordable homes could be improved to better comply with policy requirements. JCS Policy SD4: Design Requirements. Specifically, JCS Policy SD4: Design Requirements sets out that: “development should also be designed to be adaptable to

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<sup>2</sup> Ministry of Housing, Communities & Local Government (MHCLG), ‘*National Design Guide*’ (January 2021), p. 36.

changing economic, social and environmental requirements". Additionally, JCS Policy SD4 also states that- "new development should be designed to contribute to safe communities".

Whilst a cluster of 8 affordable units would not normally be problematic, the aforementioned plots- (Plots 35,36,37 and 48,49 and 50) are located in adjacent and parallel locations, meaning that, in effect, there is a cluster of large (4 & 5) bedroom homes contained within a small area. In practice, this design choice could (from speaking anecdotally to local Registered Providers) create community cohesion problems, as this clustering arrangement has potential to lead to a large number of young children (and eventually teenagers/young adults) living in close proximity, creating conditions for potential future anti-social behaviour and low-level community disruption.

Following discussions with Vistry and Nexus Planning on 08/11/23, it was agreed that Stonewater would engage with the Senior Housing Enabling Officer to discuss whether any potential ongoing housing management issues may arise from this housing arrangement.

Stonewater subsequently met with the Housing Enabling Officer on 21/11/23 to discuss the clustering of the 4/5-bedroom affordable homes as described above. During these discussions, Stonewater provided this officer with reassurance that these units would be managed effectively by Stonewater's community management teams, with the incorporation of these 4/5 bedroom affordable homes amongst market units of a similar size further aiding long-term management and ensuring that the affordable homes provided are tenure blind.

If necessary, this officer would be happy to talk to Stonewater (subject to planning permission being granted) about the possibility of setting up a Local Lettings Plan to aid community cohesion at the outset of this development.

On this basis, whilst the current siting of Plots 35,36,37,48,49 and 50 could (in this officer's view) be improved to aid community cohesion, reasonable confidence has been provided by Stonewater and the wider scheme design to allay officer concerns and overcome any objections. On balance, this officer is therefore satisfied with the current clustering arrangements of these specific plots.

### **Visual Appearance:**

JCS Policy SD12 requires that the design of affordable housing should meet required standards and be equal to that of market housing in terms of appearance, build quality and materials. To be clear, this means that all affordable homes should be tenure-blind and visually indistinguishable from their market counterparts.

Reviewing the submitted planning layouts and drawings (covering both market and affordable house types), this officer is satisfied that the affordable house types are visually substantially similar to the market homes in terms of their external and internal appearance. Both air source heat pumps and Solar Photovoltaic (PV) panels are included on both affordable and market dwellings (with one exception- see the [Net Zero Carbon section for further details](#)). Accordingly, this officer is satisfied that the affordable homes (with one exception) are tenure-blind and visually indistinguishable from the market homes.

### **Affordable Housing Standards/Occupancy Rates:**

JCS Policy SD4: Design Requirements outlines that new development should be designed to be adaptable to changing economic, social and environmental requirements, as well as specifying that new buildings should also be 'fit for purpose'. Additionally, JCS Policy SD11: Housing Mix and Standards sets out that new housing should meet, and where possible exceed appropriate minimum space standards.

A significant body of research, [including the 10 year review of the 2010 Marmot Report](#) drew a strong link between overcrowding and poor health outcomes in children, to quote: "Children living in overcrowded homes are more likely to be stressed, anxious and depressed, have poorer physical health, attain less well at school and have a greater risk of behavioural problems than those in uncrowded homes".<sup>3</sup> [The National Housing Federation \(NHF\)'s briefing paper on overcrowding](#) also found a wide range of negative mental and physical health outcomes associated with overcrowded homes.

To be clear, officers would expect that any affordable homes should be suitable to reasonably accommodate the following occupancy levels: 1 bedroom 2 person, 2 bedroom 4 person and 4 bedroom 7 person. The delivery of affordable homes at these sizes is necessary to maximise the number of households on the Council's Housing Register who can access the affordable accommodation and provide adequate living, circulation and storage space.

The proposed affordable housing mix, which is substantially similar to that agreed at appeal stage of this development, meets the Council's requirements in terms of meeting, and in some cases exceeding, the Council's minimum space standards. In this specific context, the development therefore complies with both JCS Policy SD4: Design Requirements and JCS Policy SD11: Housing Mix and Standards respectively and is supported by this officer.

### **Provision of Accessible Homes:**

JCS Policy SD11 emphasises that- "housing should be designed to be accessible and adaptable as far as is compatible with the local context and other policies". Additionally, JCS Policy SD11: requires that new development should- "address the needs of the local area, including the needs of older people, as set out in the local housing evidence base including the most up to date SHMA". JCS Policy SD4: Design Requirements compliments this position, requiring that- "New development should provide access for all potential users, including people with disabilities, to buildings... to ensure the highest standards of inclusive design".

When assessing planning applications, due regard must be given to [S.149 \(Public Sector Equality Duty\) of the 2010 Equality Act](#), which requires the Council to take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.<sup>4</sup>

The applicant's current scheme proposal seeks to deliver 56 x affordable M4(2) units, in addition to 2 x M4(3)(2)(b) wheelchair accessible affordable homes.

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<sup>3</sup> Institute of Health Equity, 'Health Equity in England: The Marmot Review 10 years on' (2020), p. 108.

<sup>4</sup> With the protected characteristic in this context being disability.

Reviewing identified need, the [2020 Gloucestershire LHNA](#) identifies a need for a minimum of 67% of new homes built between 2021-2041 should be built in accordance with that M4(2) Category 2 standards (as updated from time-to-time).<sup>5</sup> More specifically, between 2021-2041, the LHNA identifies that Cheltenham has a need to build 7,215 new level access (M4(2)) homes.<sup>6</sup> Nevertheless, this requirement must be considered in light of the scheme context, (namely, a sloping site which includes steep gradients). Accordingly, seeking a higher percentage of M4(2) homes would be impractical and somewhat unrealistic in this context. The provision of 56 affordable M4(2) units is therefore supported by this officer.

### **Provision of Wheelchair Accessible Homes:**

Similarly, the 2020 Gloucestershire LHNA projects that, to meet housing need, 213 new affordable wheelchair accessible homes (M4(3)) should be built between 2021-2041 (11 per annum).

The applicant's affordable housing statement (dated 03/10/2023) indicates that 2 x 1b2p M4(3)(2)(b) wheelchair units will be provided (on Plots 215 & 216).

Whilst this provision is welcome and broadly policy compliant (whilst reflecting need and the site context), upon reflection, policy compliance would be enhanced if the proposed wheelchair accessible homes could be more appropriately located (on the lower slopes of this development) to ensure that wheelchair users can independently move about the scheme freely and without any restriction (due to the gradients inherent to this scheme). Ideally, relocating the wheelchair accessible units could enable wheelchair users to live in closer proximity to essential community facilities, such as the Sainsbury's superstore and Priors Road shops, in addition to facilitating easier access to bus stops on Priors Road- helping wheelchair users to access essential local services, job opportunities and their local communities and support networks.

Notwithstanding this, the applicant's revised covering letter, dated 22.11.23, (which provides a rationale justifying the current locations of the affordable wheelchair user homes) broadly states that, due to the steeply sloping gradients across the site, plots 215 and 216 have been located to facilitate connections to Priors Road and non-motorised travel more generally.

With regards to potentially relocating Plots 215 and 216 to more amenable locations (nearer to the northwest SUDs Pond)- this has been rendered untenable by the community design, and considerations of overlooking and privacy for neighbouring homes (within and surrounding the scheme). These supporting arguments, when combined with the late stage of this application, are compelling enough to satisfy this officer that, (despite scope for improvements around the siting of the wheelchair units), the current proposals for affordable wheelchair accessible homes are the best provision that could be secured within the specific scheme context. Accordingly, this officer is satisfied with the provision of wheelchair accessible homes as proposed.

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<sup>5</sup> ORS '2020 LHNA', p. 124.

<sup>6</sup> *Ibid*; Figure 83, p. 126.

### **Energy Efficiency & Zero Carbon Housing Delivery:**

JCS Policy SD3: Sustainable Construction requires that development should- “contribute to the aims of sustainability by increasing energy efficiency...which will be expected to achieve national standards” (i.e., Part L of the 2021 Building Regulations).

[Cheltenham’s June 2022 Climate Change SPD](#) sets out that, in terms of energy efficiency, new homes should “be built to zero carbon standards as defined by LETI and should seek to achieve their KPI’s detailed on Page 8”. Additionally, Page 33 states that applicants should ensure that relevant measures outlined within the Climate Change Checklist, including sustainability, energy efficiency and integrating renewable energy are implemented on new developments.

Reviewing the applicants Energy Sustainability Statement dated 03/10/23, this officer notes that the energy performance of all dwellings (including the affordable homes) will exceed the 2021 Building Regulations Part L1A, as reflected within Table 3 (Page 12)- the scheme in totality will exceed the 2021 Part L Building Regulations by 66% (Page 24). In this regard, the scheme therefore complies with JCS Policy SD3: Sustainable Construction. Additionally, the applicant has reassured this officer that all affordable units will benefit from air-source heat pumps (exceeding current policy requirements).

Whilst not achieving zero-carbon standards as set out by Cheltenham’s 2022 Climate Change SPD, this development does go beyond the Building Regulations in terms of the energy efficiency of the affordable homes, thereby lowering bills for tenants and owners and reducing the risk of fuel poverty. These key objectives have been achieved via improved dwelling fabric, the utilisation of air source heat pumps, and the use of solar PV on all affordable house types (with the exception of the North East Flats). Notably, the North East Flats (Drawing Number 1820, Revision P3) indicate that the units will include “roof-mounted photovoltaics”, however, the plans seemingly don’t reflect this. This officer would therefore appreciate some reassurance by the applicant that PV will be mounted on these homes to ensure that the affordable and market homes are built to equitable standards.

This officer welcomes the provision of electric vehicle charging infrastructure, (via smart chargers) which stands to benefit affordable residents over time as Electric Vehicle usage becomes increasingly mainstream and affordable.

### **Section 106 Agreement:**

The Council will expect the owner to enter into a Section 106 agreement to deliver the affordable homes, using the Council’s [latest Precedent S.106 agreement](#) as a template. This agreement will specify the affordable housing schedule, affordable housing plan, requirement to transfer the affordable homes to a Registered Provider amongst other matters and will ensure that the affordable homes remain affordable in perpetuity.

### **Registered Providers & Nomination Rights:**

All affordable housing should be provided by a Registered Provider who will be expected to enter into a nominations agreement with the Local Authority, providing 100% nominations on first letting/sale and 75% of all subsequent lettings thereafter, with the exception of the M4(2) and M4(3) units, where this officer will seek 100% nominations on first and all subsequent lets, to ensure that,

wherever possible, these valuable homes are allocated to households in the greatest need for accessible properties.. This officer understands that the developer (Vistry Homes) has submitted a joint application on this scheme alongside Stonewater to deliver the affordable housing element of this application.

Complying with these nomination agreements will therefore assist Cheltenham Borough Council in meeting its statutory housing duties under the relevant Housing and Homelessness acts.

**Ewan Wright**

**Senior Housing Strategy & Enabling Officer**

**04<sup>th</sup> December 2023**

# Oakley Farm – Final Landscape Comments

Rev A

## Summary of landscape comments based on IDP Dwg 001

1. **Main Access Footpaths** - The main access road has its footpaths stopped short of the bell mouth. I recognise that this reflects comments from PPA4 but Glos CC as Highway Authority may have concerns about it for people who may wish to access from Harp Hill. Glos CC may also wish to see the paths constructed in anticipation of a footpath being formed on Harp Hill.
2. **Y-Headed paths in POS** – My suggestion of having Y-headed paths instead of T-junctions to paved paths in the POS has not been picked up to prevent desire lines being formed. I would not apply the same thing to the mown paths but would recommend the three paved path junctions have them and tree planting put in the central space the Y-Headed junctions form.
3. **Street trees** - The inclusion of trees in the street is welcome but it should be noted that there is a gap in the street trees along the main spine road to the NE of the feature oak. Trees here would shade the southern elevations of the houses and is a minor omission that will emphasise the presence of tree elsewhere in the streetscene of the development. The reason for their omission from this stretch could be discussed with the Applicant at the final PPA meeting.
4. **Communal Garden to north east side** – Perhaps more an impression of the landscape masterplan there appears almost as a communal garden.
5. **Proximity of western houses to footpath hedge** – The hedge that runs to east side of FP86 appears at two places to have houses proposed very close to it. This hedge is a very large one and requires maintenance to keep it as a valuable, sustainable feature in the local scene. A drawing annotation speaks of future management but does not explain what this is – sectional laying over three years is recommended, starting with the sections next to the two western-most houses.
6. **Visitor parking** - As discussed at previous PPA meetings there appears a lack of general visitor parking and understanding of road width with a line of parked cars to one, or both sides of it need to be understood..
7. **Sainsburys path** – Limited information is presented other than it will be a 3m wide tarmac path with ‘robust illuminated bollards’ set along it to create a safe route. Illuminated bollards will not be adopted by Glos CC and will remain the responsibility of the Management Company in charge of the estate. I have raised concern about vandalism to such features and repeat it here. Lower pedestrian lights on 4 to 5m columns will likely be more resistant.
8. **Path widths between houses** – The western paved path through the housing line to the POS appears quite tight, particularly when compared to other wider routes between houses elsewhere on the Site. Is there the opportunity to widen this a little so it does not become oppressive for path users or problematic for the two houses’ residents?
9. **POS paved path surfaces** – Is explained as self-binding gravel in the annotations. I have expressed concern about run-off erosion on these paths, particularly the north to south sections that run straight up and down the slope of the hill. These N-S paths at the very least should be in a bound surface e.g. coloured tarmac or resin bound paving with extensive drainage solutions (e.g. cross path run-off channels) to manage surface water. Timber edging to the bound surface would not be a robust treatment.
10. **Drawing anomaly** – Part of the Sainsburys building appears to be subject to tree planting, may need to modify the drawing before it is shown to Sainsburys!

11. **Potential curve in POS path through eastern tree belt** – To assist with gradient management and screening value of tree belt the path could be curved through the tree belt instead of run straight up and down through it.

Overall I think the proposals are however reflective of the landscape treatment that we have discussed at the PPA meetings.

### Landscape Policy Compliance

The landscape planning policies that need to be considered are set out in the following order:

- JCS
- Cheltenham Adopted Plan
- NPPF

### Joint Core Strategy 2017

#### JCS SD6 – Landscape

Part 1 – The proposals cannot be considered in keeping with the character of the Site and its rural context, including the AONB, so there is **technical conflict** with this part of the policy. However as the Inspector found at Inquiry there is sufficient similarity between the proposals and the surrounding houses to consider that the proposals are in keeping with the nearby residential areas in character terms so there is deemed to be **compliance**.

Part 2 – The proposals remove parts of the sloping open fields and associated rural character. The proposals are required to draw upon existing Landscape Character Assessments and Sensitivity information and have done so in their LVA so there is **compliance** with this first part of SD6 Pt2. The proposals will not enhance existing landscape character but retain the key features of landscape character in terms of the mature trees on Site. There is judged to be **technical conflict** with Part 2 of the policy but given the premise that the character of this collection of fields is going to change the scheme attempts to minimise it as far as it can whilst still accommodating 250 units;

Part 3 – An LVA has been submitted by the Applicant, landscape mitigation measures discussed and indicative landscape treatments are shown on the submitted masterplan. There is therefore **compliance** with this part of the policy.

Overall and on balance there is **greater compliance than conflict** with the various parts of SD6..

#### JCS SD7 – Cotswolds AONB

I consider the proposals adversely affect the character to the AONB and there is **conflict** with this policy. However the degree of harm is considered acceptable by the sitting Inspector.

SD7 also refers to the Cotswolds AONB Management Plan, the current version of which is the Cotswolds National Landscape Management Plan 2023-25. Policy CE1: Landscape is the most pertinent to considerations. The proposals do not conserve or enhance the landscape character of the Site so are in **conflict** with this policy. However as determined by the Inspector the adverse effects on the character of the AONB are considered acceptable.

The Cotswold Conservation Board issued a Position Statement on development affecting the National Landscape in 2021 titled '*Landscape=Led Development.*' This document should be reviewed in the submitted combined Planning Statement (if not already done so) to evidence how the proposals have been 'landscape-led' to give due regard to the approach laid down in that document.



## JCS SD4 – Design Requirements

**Part i) – Context, Character and Sense of Place;** New development should respond positively to, and respect the character of, the site and its surroundings and these proposals do so as far as they can internally. Linkages to the nearby developments could be improved There is judged to be **compliance** with this part of SD4.

**Part 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 landscape strategy proposals retain as much native hedgerow as possible and more mature trees to the north east of the Site than I initially thought possible. There is judged to be an overall compliance with this part of SD4.

You will need to conduct an assessment of the other parts of the policy to judge if the proposals comply or conflict with the other parts of SD4 and the policy as a whole.

## Adopted Cheltenham Borough Local Plan 2011 to 2031

### Policy L1: Landscape and Setting

This policy states that. *‘Development will only be permitted where it would not harm the setting of Cheltenham including views into or out of areas of acknowledged importance.’* It goes onto clarify the town’s setting is formed from the AONB and local character improved through high architectural quality and myriad of green open spaces. The proposals were initially argued to adversely affect local character and this is the case when judged against the rural appearance of the Site as a piece of the AONB and as part of the Cotswold escarpment. However when judged against the houses set around it to the north and west and to a lesser extent to the south along Harp Hill the proposals are considered to be similar to the existing form of Cheltenham.

The broader setting to Cheltenham is not adversely affected and even though local distinctiveness is lost from the area of Oakley the wider setting and character of the town remains unchanged. There is deemed to be **compliance** with this policy.

## NPPF

### NPPF 131 – Street trees

There are street trees indicated but further details should be sought to judge their effectiveness to comply with highway requirements. There is anticipated to be **compliance** with this national policy.

### NPPF 174 a) – Valued landscape

The Site is considered a ‘valued landscape’ as part of the Cotswolds AONB so this part of NPPF 174 is engaged. The proposals do not preserve or enhance the character of the Site as a valued landscape or the character of other parts of the adjacent Cotswold AONB. There is **conflict** with this part of the NPPF but as the Inspector has already determined this is considered an acceptable harm when weighed against the benefits of the scheme.

### NPPF 174 b) – Intrinsic quality of countryside

The Site also has intrinsic value as a piece of countryside as reflected by its national landscape designation. There is **conflict** with this part of NPPF 174 but it is considered acceptable by the Planning Inspector. The POS to the south will retain some elements of the countryside in terms of ridge and

furrow and grass land character but the introduction of numerous trees will change its character to one that is more parkland in nature.

**NPPF 176 – Nationally designated landscapes**

Great weight should be given to conserving and enhancing landscape and scenic beauty in AONB's such as the Cotswolds AONB. There is *conflict* with this part of the NPPF as the proposals would reduce the landscape character of the Site as a piece of the AONB and its context to the east. The Inspector considered that even with great weight applied to the landscape character change there was still greater benefits accruing from the proposals.

Stuart Ryder

3/11/23

Rev A – AONB Management Plan and CCB Landscape-Led Development Position Statement added

**Name** Matt Haslam (BA (Hons), Dip UD, MA UD)  
**Title** Urban Design Consultant  
(on behalf of Cheltenham Borough Council)  
**Email** [matt@futurescapedesign.com](mailto:matt@futurescapedesign.com)  
**Telephone** 07990 528310  
**Application No.** 23/01691/REM



**Description** **Application for approval of Reserved Matters (access, appearance, landscaping, layout and scale) following outline planning permission for residential development of up to 250 dwellings and associated infrastructure, ancillary facilities, open space and landscaping, demolition of existing buildings and creation of a new vehicular access from Harp Hill (in accordance with the terms of outline planning permission 20/01069/OUT). Details are also submitted in relation to conditions 6 (phasing), 9 (Energy and Sustainability Statement), 13 (Harp Hill access junction details) and 25 (hard and soft landscaping and boundary treatment) of 20/01069/OUT**

**Address** Oakley Farm Priors Road Cheltenham Gloucestershire GL52 5AQ  
**Date** 26/10/23  
**Case Officer** Lucy White

Lucy,

Please find below urban design comments on the above application. This follows a lengthy and detailed pre-application process over a 4 month period, within which the applicant and design team have made a concerted effort to overcome numerous constraints and a very awkward site which presented many design challenges.

I have set out comments which identify a number of mainly detailed design points which it is suggested should be dealt with as part of an amended scheme design.

### **Connections / access**

While the various access and movement routes within the site are set out on page 24 of the Design and Access Statement (DAS), important access points into the site from surrounding areas are not shown. Possibly the only significant outstanding issue is the provision of access routes into the site from the north and east. This issue has been discussed during pre-app meetings but I do not feel that a conclusion has been reached on this. Certainly access from the residential area to the east is essential to be agreed and would allow adjacent communities to access and experience this site and the very positive existing landscape and environment, as well as the proposed play areas.

### **Parking**

Another significant part of any scheme design is how parking is dealt with. Overall, parking is well-considered and it feels like there will be sufficient provision to meet the needs of the residents. However, I would have to defer to Highways and they will be commenting in detail on this and other aspects. A particular issue is that representatives from the Highways team have not been involved during any of the regular PPA pre-application meetings with the borough council so it is very hard to understand if there are any significant issues relating to this from their perspective. Given that this site is some

distance away from the town centre, but is very close to the Sainsbury's supermarket accessed off Redmarley Road adjacent to the site to the NW, this site should be treated as suburban, requiring an appropriate level of parking.

Page 24 of the DAS notes that the minimum garage sizes are 3 x 6m, but this is not sufficient for people to be able to comfortably park their cars and exit the vehicle on both sides. We know from the experience and feedback from other schemes that around 80% of garages at those dimensions are not used for parking cars, but rather for the storage of household items. Private vehicles in general are also becoming wider and longer, which will exacerbate this issue further. This will inevitably lead to allocated spaces not being used, which will lead to more pressure on on-street space, for both residents and visitors. A good example of where an integral garage works well is the open market Hazel Undercroft house type, where there is a good level of space to the sides of cars, including some space for the storage of items.

**Density**

250 homes are proposed, and according to the DAS (page9), the developable site area not including the root protection areas of the trees, results in an overall (net) density of 39 dwellings per hectare (dph). Given the significant area of the site left as open space or for the setting of existing trees, this is a comfortable level. This strikes a sensible balance between the provision of much-needed affordable and market homes, and the edge of settlement location.

**Bin storage and access**

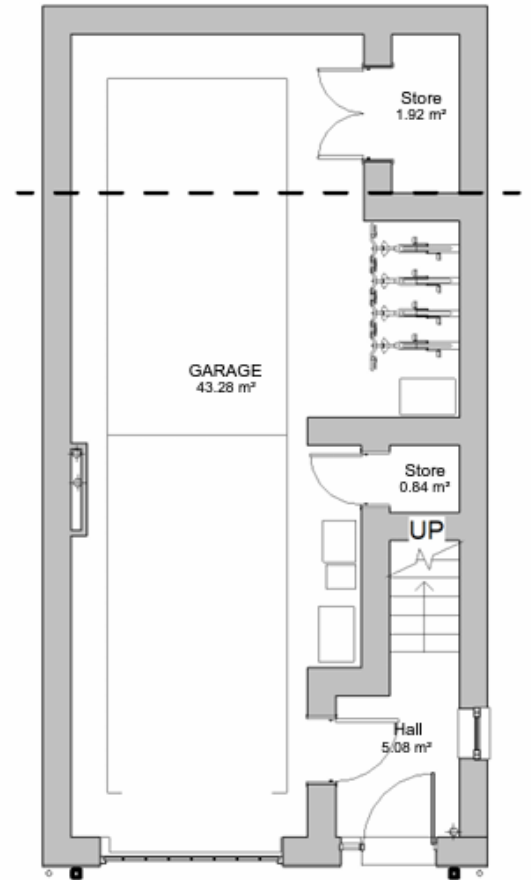
All terraced houses have front bin storage which is certainly a positive feature. We would need to see detailed plans of the construction, application of materials and sizes, to ensure that sufficient space is provided for the required bins. It might also be sensible to consider if additional storage space could be provided for EV charging cables.

**Specific layout comments**

The sub-station opposite plot 1 - this is a highly prominent position and is right at the end of the long view line along the main access route (from west). The first suggestion would be to move this to a less prominent position, or screen the structure with vegetation.

The area of parking and green space to the south of unit 155 could form a slightly more positive terminal vista from the street which runs past plots 94 and 95. The end gable of plots 155-157 defines the space well but could a tree in that space create a focal point?

A path will be needed to the rear of plot 217. If people from the development to the east wanted to visit the central play area, the desire line would be through this space, rather than to the front of plot 217 and 218, then back up the steps to the side of plot 220. Nothing is shown within the main DAS but an informal mown path is shown in the landscape document. Is a mown path sufficient given the potential importance of the connection to the east? Mown paths are fine in the summer but can quickly become muddy and slippery in the wetter months and offer a very limited accessibility provision.



**Architecture / application of materials**

The following comments are more detailed and relate to the house types and the application and specification of materials.

Where dark cladding is applied to the upper levels of properties, it is generally better to continue wrapping the cladding around the front and the sides (as with the Spruce Retaining GF, applied to plots 26, 28, 89 and 90, or the Chestnut No Gable type). This avoids awkward joins in prominent locations and the effect of the cladding just stopping partly around the corner, which is not a positive way to finish the effect. For example, for the mews plots including no.27 (Buckthorn), the sides should be clad, finishing into the corners. The sides, although partly concealed by the first floor amenity spaces, will still be visible as people move along the streets.

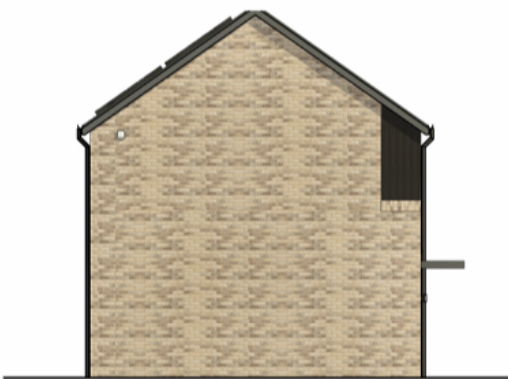
The different effects can be clearly seen within the Plot 25 (Buckthorn side balcony) elevation sheet (see below), with a more positive effect seen in the examples where cladding is applied across the whole facade.



1101 Front Elevation  
1 : 100



1101 Rear Elevation  
1 : 100



1101 Side Elevation  
1 : 100



1101 Side Elevation 2  
1 : 100

For the mews plots (and other house types where a dark cladding is used), the garage doors and front door are shown as a mid/light grey. This just introduces another colour into the composition which doesn't seem to complement the other tones. It would be more balanced to use the same darker grey/black as the cladding, or use a simple, untreated/uncoloured timber.

Query: for the Hazel open market SL-Down Gable elevation plan, it looks like the garage roof is constructed of slates/tiles but it is flat. This would likely not be possible unless a form of clipped and sealed tile system is used which stops water running back under the tiles. Is this going to be a form of rubber covering?

The open market Hazel SL-Up Pitch house type shows the 1st and 2nd floors joined with a darker feature. The first thought was why doesn't this project, as in a box dormer feature, as there is an opportunity to create a more three-dimensional impression, with more depth. In addition, when water runs off the darker material and then across the lighter material below, we would need to be sure that the join between materials will work well but that also staining does not occur.

The open market Hazel SL-Down Gable house type is a good way of increasing floorspace with minimal impacts.

The Oak Tree Flats (plots 51-56, 68-73) are generally positive. The main long elevation facing the Oak faces west and so will benefit from views across the open space towards the west. All of the apartments benefit from private amenity space, in the form of balconies, however, each of these is fairly narrow and will not allow a range of activities. These measure 2m wide, by 1.5m deep (3m.sq), and this is well below the more standard 5m.sq. balconies seen in many other developments.

The overall building is essentially split into four main blocks, with circulation between and a courtyard space within the centre, accessed off the parking areas. However, this courtyard will not benefit from much natural light and there are only two flats which have windows which overlook this space, plus the windows from the stairwells.

Query: why are there two separate staircases each serving only 3 flats, on the northern side of the building? I'm assuming this might relate to fire regulations, but unless there is a good reason to provide two stairwells, would it not be more efficient to have 6 flats accessed off a single stairwell, as with the flats on the southern side?

The elevations are positive, but as suggested in my final comments as part of the pre-application process, the use of both flat roofs and mansards does depart from the established character seen in the rest of the development. You do get a very clear sense of the different parts of the building, looking at the side elevation (eastern elevation) in the top right corner of the elevations sheet.

The submitted scheme is well-ordered, with good-sized windows. The use of a multi light brick across the majority of the facades is a more refined approach than including smaller elements of render and the different building lines also contribute to a sense of variety and interest. The projecting bricks at ground floor will need to be carefully considered, in terms of how many courses between each. Two bricks between each projecting course might work well and not create too heavy an impression. This could be tested within sample panels.

How the mansard roof material joins the lighter bricks below will be really important to carefully consider. The material itself should also be very high-quality, possibly a metal. The quality of the finishing in these areas is critical as certain areas will be very visible given the varying ground levels, and slightly longer views towards this building.

Query: the eastern elevation shows ground levels across three different levels, but the layout plan seems to only indicate two main levels. It would be very useful to see a 3D multi-view of this block to be able to better understand the levels.

The elevation plan shows a 2-storey blank retaining wall as part of the front elevation. I would suggest that a form of creeping vine is grown against this, possibly Virginia Creeper, which doesn't damage materials. This would create a living green wall which changes during the seasons.

For the Glade apartments, its position between the mature oak trees is positive and will provide good overlooking over the Glade play area. Access to the various entrances within the block is via steps but this is somewhat unavoidable given the topography. The position of this building has been moved further north to compensate.

The view from the car park towards the northern elevation is generally positive, however the first floor balcony over the bin store is not cantilevered, and there will likely be an issue with possible conflicts between the balcony supports and bin movement in that area.

One suggestion could have been to provide elevations based on NE, SE and SW facing sides, rather than the traditional compass points as that would have shown that the block actually has quite a simple but refined structure, which might not be apparent from the angled submitted elevations.

Similar comments apply to this as have been noted for the Oak tree apartments, particularly in terms of the size of the balconies.

## **Materials**

In terms of the principal materials, a refined, modern and high-quality palette has been developed, which both references the Cotswold stone and light render seen in Cheltenham, and the stone seen in the various Cotswolds settlements in the wider area. The use of a Cotswold stone reference brick is a good choice and can create a modern but robust finish.

For recon stone, I would suggest avoiding the very yellow-toned types, as these always look artificial. Newly quarried Cotswold stone tends to start out with a range of creamy/light/yellowish tones, but this fades to a pale creamy grey fairly quickly. This process doesn't seem to occur to the same extent in the recon products which can add to a sense that the recon stone is not a natural product. In my opinion, a very high-quality and varied multi brick provides a much more positive finish than the best recon stone products available. I would suggest using either a good quality natural Cotswold Stone or a high-quality multi brick, but of course testing the different recon products which are available is essential.

Another detailed design issue are the mortar joints between recon stone units. The ashlar stone approach traditionally involves finely worked and smooth stone, placed very close to each other with very thin joints. There are many examples of this style in Cheltenham but the recurring problem with this approach in modern buildings is that mortar joints are almost always much too thick and they are constructed as if they were bricks or blocks, often with standard mortar joints which are around 10mm.

I cannot find any reference to the Clerkenwell Romsey brick which is mentioned in the DAS, but there would need to be a process of checking various samples to select a textured, multi-toned and high-quality product. This would also have to include sample panels. The quality of the selected brick must be very high given the extensive use of this material across the site.

For the render, this should be complementary but also slightly contrasting to the recon stone and brick, in terms of tone and texture. Again, this will need to be tested through samples and a sample panel.

The dark-toned cladding in areas adjacent to landscaping, needs to be robust and not require on-going maintenance, given that it is often placed at higher levels and will be hard to access. I have previously suggested the Cedral weatherboard cladding material, as this provides a maintenance-free and robust finish. This has been tested on numerous schemes in the past and creates a positive impression.

For roof materials, a dark grey slate would be the primary contextual reference and covers both Cheltenham and the wider Cotswolds character areas (Stroud, Painswick, Cirencester etc.) The more traditional material would be a natural stone tile, but there are a few fairly obvious issues with that approach, such as cost, weight, and supply. Using a dark grey slate (or high-quality equivalent fibre-cement tile), would also provide some visual contrast with the much lighter facing materials.

### **Landscape / public art / boundary treatments**

The site has a strong landscape character, which consists of a combination of steeply sloping topography, strong field boundaries, and numerous stand-alone mature trees. There is also a borrowed character which is formed by the raised site level relative to the surrounding land, which provides long distance views across Cheltenham, incorporating numerous built and natural landmark features. I will defer to comments from landscape colleagues on detailed landscape issues, but there are a number of points which cross-over into the broader urban design area.

We will need information on how the public art features will be dealt with, created, commissioned, and the process which should be followed. Any public art features should be site-specific and ideally community-led.

The brown lines on the boundaries materials plan indicates timber fence forms, but these are shown on the plan as finishing many of the garden boundaries which define areas of public realm. Unless there is a very robust and high-quality example which can be shown for this approach, it would be better to generally use a solid construction approach, such as a brick wall, as this is always more robust, requires less maintenance, and is more visually appealing. Examples include the sides of the gardens of plots 114, 115, 67, 77, 83, 102, 105, 106, 153 etc.

The boundaries plan also doesn't seem to indicate where the solid wall boundaries are.

For the plots with boundaries facing north towards the existing landscape features (e.g. plot 143), we will need to be sure that this approach is going to be robust and sufficiently secure. There is certainly an argument that timber boundaries might relate well to the landscape setting but something more than standard fence panels will be required.

Query: are timber fences needed to the rears of the mews plots? Aren't those solid construction (part of the building)?

The 2-storey brick retaining wall within the Oak Tree car park is also shown as timber fencing? This needs to be amended.

Timber fencing also shown around plots 219-222 but these are shown as open or brick, on the street scenes plans.

Just one comment on the landscape document (page 41). Just thinking about providing a more direct stepped route down the slope, particularly from where the number 1 is shown, to the next level down. At present, there is a long curved route, which is fine, but there is a clear desire line straight down the slope too.



## Conditions

As noted above, there are various elements which will need to be covered under conditions, principally the materials, including (but not limited to) the following;

- Recon stone, render, brick, dark timber/cladding
- Roof tiles (fibre-cement / slate), mansard roofing
- Boundary materials, including any solid materials, railings, fencing, paving, edging, kerbs
- Details and finishes of the terraced housing bin stores
- Balconies, windows, metal cappings
- Details of the public art - locations, process, methodology, outline general approach, some mechanism for agreeing overall costs/budget. From my perspective, it would be appropriate to seek to integrate some of the intended artworks into the functional landscape, perhaps as usable furniture, such as benches, play space items etc. It would be positive to allow for at least a few stand-alone artworks within the scheme, possibly with an element of interaction, but all of these issues should be covered within a public art strategy, produced by a public-artist alongside community groups/representatives/local residents.

## Summary

These proposals constitute a significant increase in quality, over the more recently permitted housing schemes in the area. More generally, this scheme, subject to the provision of high-quality materials and finishes, could challenge the better quality schemes nationally. This is possible through the combination of landscape and the various bespoke built forms, which includes a strong commitment to integrating the topography into the core design approach. Attempts to include surrounding landmarks into view corridors through the scheme and the split-level housing, takes advantage of the opportunities created by the sloping land.

The approach references parts of the historic Cheltenham architectural language and brings in styles from the Cotswolds, while developing a character which is also partly unique to this site. This approach is very successful. The use of a light brick which aims to reference the natural stone seen in Cheltenham and the Cotswolds, as well as the light render from Cheltenham, is perhaps the critical feature, and allows a modern style, which has clear and strong connections to the two areas.

The provision of numerous play areas and the large swath of green space along the southern boundary, also adds to a sense of purpose and consideration. The main central Glade play space is one of the highlights of this scheme, including the surrounding landscape and built forms. The street network is generally well-considered and logical and creates a functional and effective access network within what is a very challenging site.

**Many thanks,  
Matt Haslam**

[www.futurescapedesign.com](http://www.futurescapedesign.com)