

**REGIONAL SPATIAL STRATEGY
FOR THE SOUTH WEST**

EXAMINATION IN PUBLIC

**RESPONSE TO PANEL NOTE 2:
PROGRAMMING OF
DEVELOPMENT AREAS**

**AREA SEARCH I: NORTH /
NORTH WEST CHELTENHAM**

**PREPARED ON BEHALF OF
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RSS EIP REFERENCE 715B

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1.0 INTRODUCTION

- 1.1 Further to the publication of Panel Note 2, it would appear that potential participants who are promoting the development of these areas have been invited to contribute information on the programming of development.
- 1.2 We have submitted comments on the draft list of attendees, noting in the strongest possible terms that it would be both unfair and unsound for only one party promoting development within the appropriate sub / search areas to be able to contribute to the debate, as this is likely to present one-sided and imbalanced evidence. Linden Homes consider that there are particular factors, evidence and critical factors that need to be considered in open debate at the EiP and that they have an invaluable contribution to make to this debate, which the Panel would benefit from hearing.
- 1.3 Linden Homes are therefore greatly concerned that only selected parties have been invited to comment on the Topic Paper 2 as there are other parties, including Linden Homes, that are able to make valuable contributions to this issue in order to assist the Panel in coming to their recommendations.
- 1.4 On this basis, and in the interests of providing both concise and positive evidence to the Panel, the following paper briefly sets out the opinion of Linden Homes on the ability to deliver the necessary levels of housing within the Gloucester / Cheltenham sub area, drawing particular attention to Search Area I.
- 1.5 Linden Homes has also sought to highlight potential obstacles to the delivery of the dwelling requirement and made suggestions to the Panel for assisting such delivery in the period up to 2026.
- 1.6 Linden Homes are promoting land to the north / north west of Cheltenham, which is within the administrative area of Cheltenham Borough Council.
- 1.7 The evidence submitted is based upon significant experience of large scale developments, major urban extensions and new communities throughout the south of England.

2.0 EXPECTED START DATE

2.1 Given the scale of development proposed north / north west of Cheltenham, it is considered that there are a number of factors influencing the expected start date for a strategic urban extension at north Cheltenham. These factors are identified as:

- Adoption of RSS
- Adoption of LDF Core Strategy
- Adoption of Site Specific Allocation DPD
- Undertaking an Environmental Impact Assessment
- Submission of outline planning application and attendant 16 week determination period.
- Delivery of signed legal agreements securing relevant physical and community infrastructure provision.
- Reserve Matters application
- Physical Infrastructure Delivery

2.2 Delays to the delivery of dwellings from large scale developments are likely to occur from a combination of:

1. Joint Working between local planning authorities
2. Infrastructure requirements prior to the delivery of dwellings, for example significant new road construction
3. Site Constraints
4. Uncertainty in the planning process
5. Land ownership disputes

Joint Working

2.3 Linden Homes has submitted representations to the draft RSS on the important issue of Joint Working. Linden Homes' experience of large scale developments elsewhere in the UK has highlighted the delays that can occur when developments are proposed across more than one administrative area.

2.4 In such scenarios, whilst the Government departments may seek to encourage adjoining Local Planning Authorities to

work together in allocating and delivering large scale developments through Joint Area Action Plans, the realities of political influence and differing planning objectives frequently result in significant uncertainty and subsequent delay to the delivery of much needed dwellings and community infrastructure.

- 2.5 A timely example of the difficulties of joint working and how this can affect a start date is highlighted by the recent work commissioned by Cheltenham Borough Council on the Green Belt, which should have been undertaken jointly with Tewkesbury Borough Council. However, as the recommendations will not be "owned" by Tewkesbury Borough Council, this work will no doubt need to be repeated for Tewkesbury Borough. The concern here is that does the Cheltenham Study present a fait accompli which is acceptable to Tewkesbury Borough, which may have a development agenda of its own. Such lack of joint working at this early stage does not bode well for any development dependent upon joint working.
- 2.6 It is worth noting that the Local Development Schemes for Cheltenham and Tewkesbury Borough's are already significantly "out of sync", thereby affecting the delivery of any proposal that requires joint working.
- 2.7 This is demonstrated with the draft LDS for Tewkesbury Borough showing the Issues and Options consultation on the Site Specific DPD commencing no earlier than post 2010, where Cheltenham anticipates such a DPD being submitted to the Secretary of State by mid 2008.
- 2.8 Therefore, whilst the draft RSS may include very worthy encouragements for adjoining authorities to work together, Linden Homes is sceptical on the ability for this to take place without delay to the delivery programme. Even with the threat of Government Office / Secretary of State intervention, delays will still occur.
- 2.9 The Panel are therefore respectfully urged to identify broad locations for development where they do not cross administrative boundaries. This is in order to minimise procedural delay arising in the delivery of new housing.
- 2.10 The Panel are also respectfully urged to encourage the appropriate County Councils to assist in the speedy delivery of

the necessary infrastructure and assist the developers in making the earliest start to the development as possible.

Infrastructure requirements / Site Constraints

- 2.11 Large scale developments can often be delayed if they are unnecessarily complex by virtue of their infrastructure or site constraints. For example, developments required to be served from a new bypass / relief road can result in delays whilst they are assessed, designed and constructed, irrespective of the land ownership constraints that may exist.
- 2.12 Site constraints, such as flooding, sensitive ecology, archaeology and mineral deposits can result in significant delays to the commencement of development.
- 2.13 However, the proposed development North / West of Cheltenham in the vicinity of Hyde Farm is neither constrained by the requirement for a new bypass / relief road or by any significant environmental matters.
- 2.14 As part of the CO2 reducing agenda, the timing of any public transport infrastructure is essential in encouraging modal shift from the early occupiers of new developments, rather than bolting it on as a reactionary measure. As a result, certainty in the planning process, combined with public sector funding and assistance can ensure the early delivery of public transport schemes.
- 2.15 One such example is the proposed LRT system utilising the former Honeybourne Line which will provide an important link though Cheltenham into the Town Centre from the Hyde Farm Site.
- 2.16 Whilst such public transport provision can take some time to implement, opportunities to improve bus provision in the interim on direct and accessible routes (for example Evesham Road north of Cheltenham) can provide a useful interim measure to ensure modal shift occurs from the outset to inform travel patterns for future occupants.
- 2.17 It is therefore suggested that in making recommendations on the draft RSS, the Panel avoid road led development solutions that will be necessary to serve such development.

- 2.18 Furthermore, local planning authorities responsible for delivering large scale developments need to be required to assess site constraints and assess the implications on the delivery of development before such land is allocated.
- 2.19 Where public transport improvements are rightly required to serve new development, the Panel should ensure local planning authorities alongside the developers are tasked at an early stage with securing any additional funding and delivering such provision from the outset.

Uncertainty in the Planning Process

- 2.20 One of the major delays to the commencement of large scale developments is the uncertainty over the principle of development, the precise location and the implications of the political process. Until that certainty exists, developers will be reluctant to commence the preparation of detailed masterplans, the detailed design process, community engagement, or infrastructure provision.
- 2.21 The earlier that an allocation can be secured in the appropriate DPD, with the necessary development briefs / masterplans prepared and outline consents granted, the earlier development will commence.
- 2.22 The Panel should therefore recommend that local planning authorities look to an early grant of an outline consent and recommend the Government Office oversee the process to avoid any unnecessary delays, including the necessary community involvement in the process.

Land Ownership Disputes

- 2.23 Large scale developments can sometimes be subject to significant delays if their delivery requires third party land for any infrastructure or development.
- 2.24 Local Planning Authorities should therefore be required to assess, at an early stage, the necessary infrastructure requirements and determine if any third party land is required.
- 2.25 In the event that third party land is identified, local planning authorities and developers should be required to demonstrate that agreements are in place for the delivery of such land prior to the precise location of development being determined.

In the event that Compulsory Purchase is required, local planning authorities should be required to use their powers and commence this process in association with the developers at an early stage so as to avoid any delay to the commencement of development and delivery of dwellings.

- 2.26 The land being promoted by Linden Homes north / north west of Cheltenham has the advantage that it does not have any site constraints or infrastructure that would result in any significant delays to the commencement or delivery of development.
- 2.27 Whilst this development seeks to provide a light rail link to the town and railway station, in association with early cooperation and assistance with the County and Borough Councils, this work can be commenced at an early stage. Furthermore, the ability to integrate with the town and provide direct / short bus routes from the development to the town centre ensure that occupants will benefit from public transport provision from the outset. Furthermore, this development does not require Joint Working with adjoining authorities as the land is wholly within the jurisdiction of Cheltenham Borough Council.
- 2.28 On this basis, the following timetable for development North / North West of Cheltenham is suggested:

RSS published	End 2007
LDF / DPD site allocation	End 2008 / early 2009
Masterplan / Development Brief	End 2008 / early 2009
EIA	Mid / End 2009
Outline consent, in association with legal agreements	Mid 2010
Reserved Matters consent (in whole or in parts)	Mid 2011
Site Assembly / Pre-commencement infrastructure	Mid 2010 – Mid 2011
Commencement of development	End 2011

3.0 BROAD DEVELOPMENT PROGRAMME

- 3.1 Assuming the above timetable, Linden Homes consider there to be scope to deliver at least 5000 dwellings north / north west of Cheltenham by 2026.
- 3.2 With any major development, there is always a lead-in time before the development reaches its peak development rate.
- 3.3 It is worth noting that such developments may involve a number of developers, in this case 2-3, who will build out the approved scheme to the requisite standards identified and promoted through the RSS / LDF and planning application and masterplanning processes.
- 3.4 Furthermore, the following programme reflects the fact that the housing market can fluctuate, resulting in the varying delivery of different types of housing (flats, family housing etc) at different times, according to market requirements.
- 3.5 It is also worth noting the importance of creating a “community” and not just residential development. The delivery of housing therefore needs to be phased with the delivery of the community infrastructure, open space, employment space etc.
- 3.6 The following projected housing completions are therefore suggested for North / North West Cheltenham:

Year	Annual Completions	Cumulative completions
2012	150	150
2013	300	450
2014	450	900
2015	550	1350
2016	600	1950
2017	600	2550
2018	600	3150
2019	600	3750
2020	500	4250
2021	400	4650
2021	200	4850
2022	150	5000

- 3.7 This programme allows for a significant level of flexibility and in order for 5000 dwellings to be completed assumes an average annual completion of only 313 dwellings.
- 3.8 The above programme for the proposals north / north west of Cheltenham also allows for the opportunity to increase the scale of development beyond 5000 dwellings prior to 2026, whilst allowing for further fluctuations in the housing market in addition to (although hopefully avoided) delays in the planning process.
- 3.9 Developments dependent upon joint working between local planning authorities and the adoption of an Area Action Plan will therefore be subject to much further constraint and may struggle to complete the requisite level of development prior to 2026.

4.0 IMPLICATIONS OF ANY STRATEGIC INFRASTRUCTURE

- 4.1 Environment and physical investigations undertaken to date confirm that the development north / north west of Cheltenham being promoted by Linden Homes is relatively unconstrained.
- 4.2 As highlighted above, the proposals seek to provide a Light Rail system along the former Honeybourne Line to the town centre and railway station. It is recognised that this will require a reasonable level of investment and may take a number of years to bring forward. However, the benefits to the town, the racecourse and the development north / north west of Cheltenham are so significant that Linden Homes are convinced that the investment and time required are wholly worthwhile.
- 4.3 Early assistance by the County and District Councils will greatly assist this important public transport provision.
- 4.4 However, the location of development in close proximity to Evesham Road allow for simple and significant improvements to the existing bus services to provide direct and attractive services to the town centre , railway station and beyond, from the outset of the development.
- 4.5 In contrast, proposals requiring significant road infrastructure, particularly those promoting or dependent upon a bypass / relief road to the north / north west of Cheltenham and

junction improvements to the M5 are very likely to be subject to delay due to the Highways Agency objection in addition to the timescale for delivery.

- 4.6 Linden Homes has undertaken initial investigations into the ability to serve the development with the necessary utilities and is able to confirm that no constraints are known to exist that will result in the delay in the programme outlined above.
- 4.7 In terms of strategic planting to define the revised boundary to the Green Belt, with the agreement of the Borough Council, the opportunity exists to undertake early planting to ensure established and defensible boundaries exist from an early stage in the development, if not prior to commencement of development.