CHELTENHAM
BOROUGH COUNCIL

Notice of an extraordinary meeting of Planning Committee

Thursday, 31 July 2014
6.00 pm
Council Chamber - Municipal Offices

Membership	
Councillors:	Garth Barnes (Chair), Jacky Fletcher (Vice-Chair), Paul Baker, Andrew Chard, Matt Babbage, Diggory Seacome, Flo Clucas, Bernard Fisher, Colin Hay, Helena McCloskey, Andrew McKinlay, Klara Sudbury, Pat Thornton and Malcolm Stennett

The Council has a substitution process and any substitutions will be announced at the meeting

Agenda

1. **APOLOGIES**

2. **DECLARATIONS OF INTEREST**

3. **PUBLIC QUESTIONS**

4. **13/01605/OUT LAND AT LECKHAMPTON, SHURDINGTON ROAD** (Pages 1 - 1418)

5. **ANY OTHER ITEMS THE CHAIRMAN DETERMINES URGENT AND REQUIRES A DECISION**

Contact Officer: Judith Baker, Planning Committee Co-ordinator
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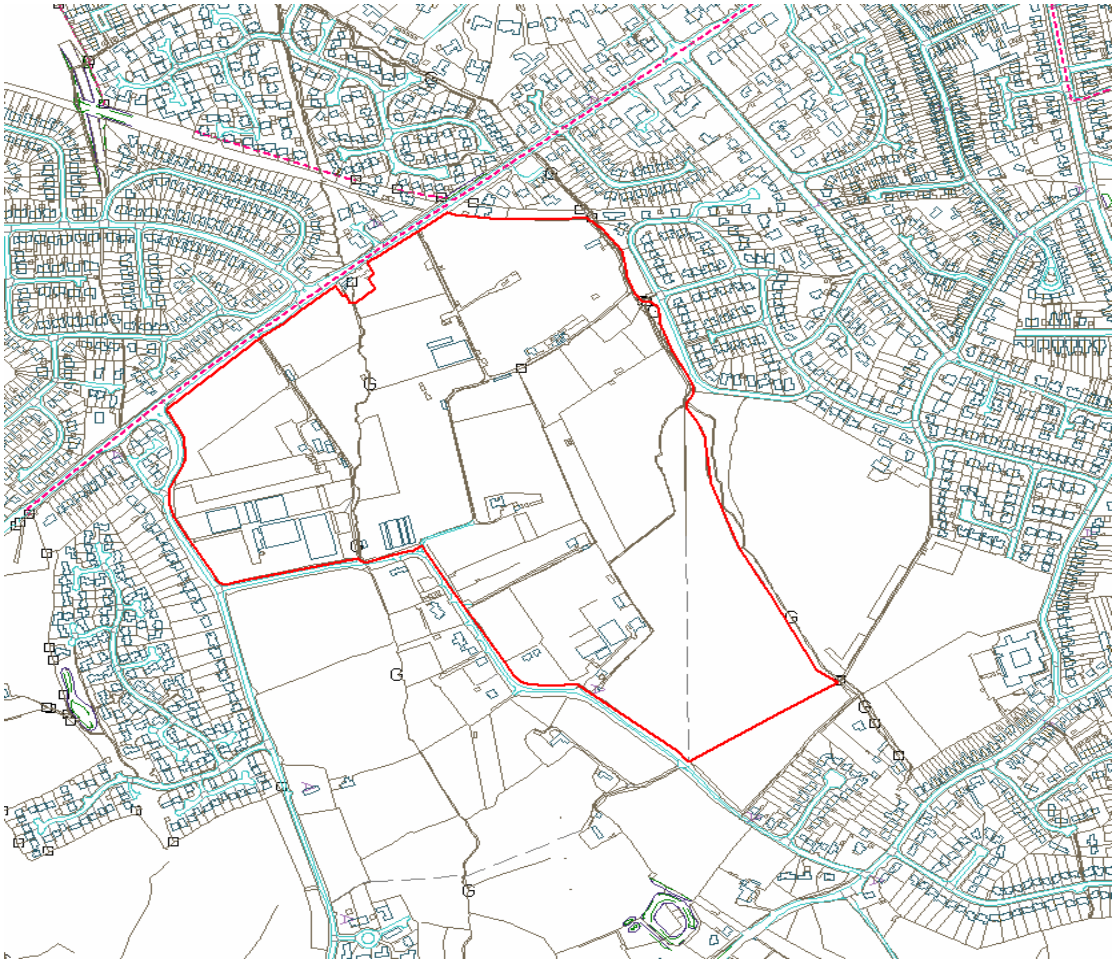
APPLICATION NO: 13/01605/OUT	**OFFICER: Mr Craig Hemphill**
DATE REGISTERED: 17th September 2013	**DATE OF EXPIRY:** 7th January 2014
WARD: Leckhampton	**PARISH:** Leckhampton With Warden Hill
APPLICANT:	Bovis Homes Limited & Miller Homes Limited
AGENT:	RPS Planning & Development
LOCATION:	Land At Leckhampton, Shurdington Road, Cheltenham
PROPOSAL:	Residential development of up to 650 dwellings; mixed use local centre of up to 1.94ha comprising a local convenience retail unit Class A1 Use (400sqm), additional retail unit Class A1 Use for a potential pharmacy (100sqm), Class D1 Use GP surgery (1,200sqm,) and up to 4,500sqm of additional floorspace to comprise one or more of the following uses, namely Class A Uses, Class B1 offices, Class C2 care home, and Class D1 Uses including a potential dentist practice, childrens nursery and/or cottage hospital; a primary school of up to 1.72ha; strategic open space including allotments; access roads, cycleways, footpaths, open space/landscaping and associated works; details of the principal means of access; with all other matters to be reserved.

RECOMMENDATION: Permit Subject to S106



1.0 Introduction

1.1 Structure of the report

1.1.1 The report within the introduction section 1 sets out the context of the site and surroundings, the detail of the application, relevant planning history, a summary of the comments that have been received from Statutory Consultees on the application, together with a summary of the concerns made form the public. Full details of the comments made can be read in full at appendix 1 for Statutory Consultees and at appendix 2 for public comments. The last part of section 1 picks up Community Infrastructure Levy requirements.

1.1.2 The following sections will deal with main considerations for the application as follows:

Section 2 – Principle of the Development
Section 3 – Landscape and Visual Impact
Section 4 – Design and Layout
Section 5 – Sustainable Transport and Highway Safety
Section 6 – Affordable Housing
Section 7 – Flood Risk and Drainage
Section 8 – Community facilities, open space, outdoor recreation
Section 9 – Education and Library Provision
Section 10 – Archaeological and Cultural History
Section 11 – Ecology and Nature Conservation
Section 12 – Air Quality
Section 13 – Other Material Considerations
Section 14 – Balanced Conclusions and Recommendation

1.2 The site and its surroundings

1.2.1 The application site is situated adjacent to the Cheltenham Urban Area as shown on the location plan. The site is located near to the administrative boundary with Tewkesbury Borough Council, land beyond The Lanes residential area and Farm Lane.

1.2.2 The site comprises a number of parcels of land north and east of Kidnappers Lane which are largely in agricultural use. The site area measures 33.44ha.

1.2.3 The Hatherly brook runs though the middle of the site from south to north with a watercourse also running along the western and eastern boundaries from north to south. There are a number of mature trees and hedges on the site and along field boundaries. Public footpaths cross the site within Lotts Meadow running from the Burrows Playing fields to Kidnappers Lane (CHL/13) and from Kidnappers Lane towards Merlin Way (CHL/11). There is also a public right of way to the northern part of the site linking Kidnappers Lane and Merlin Way (CHL/6).

1.2.4 To the north of the site is Shurdington Road, the A46 with residential properties on the opposite side of the A46. To the east, the site boundary meets further residential properties on Merlin Way and existing sports

pitches. The southern boundary facing the rear gardens of Vineries Close. The western boundary of the site runs along Kidnappers Lane with an established hedgerow along the majority of the boundary.

1.2.5 Further to the south of the site, beyond Church Road lies the escarpment of the Cotswolds Area of Outstanding Natural Beauty and the Green Belt, land to the west beyond The Lanes and Brizen Lane residential area is the Green Belt. The application site is located outside both of these constraints and has been historically been referred to as white land, defined by the Cheltenham Borough Local Plan (2006) as unallocated land.

1.3 Current application

1.3.1 The current application seeks outline permission for:

- Residential development of up to 650 dwellings;
- Mixed use local centre of up to 1.94ha comprising a local convenience retail unit Class A1 Use (400sqm),
- Additional retail unit Class A1 Use for a potential pharmacy (100sqm),
- Class D1 Use GP surgery (1,200sqm,)
- Up to 4,500sqm of additional floor space to comprise one or more of the following uses, namely Class A Uses, Class B1 offices, Class C2 care home, and Class D1 Uses including a potential dentist practice, children's nursery and/or cottage hospital;
- A primary school of up to 1.72ha;
- Strategic open space including allotments; access roads, cycleways, footpaths, open space/landscaping and associated works;
- Details of the principal means of access.

1.3.2 The application seeks to determine the principal means of access at this stage; however, appearance, landscaping, layout and scale are reserved for future consideration.

1.3.3 Whilst the above matters are reserved, the applicant has provided an indicative layout, which indicates how the development could be implemented which includes setting the context of the application site within a wider comprehensive scheme. Parameter plans and other illustrative plans have also been provided which elaborate on the indicative layout in respect of land uses, house density, building heights, access and movement, green infrastructure and phasing. These plans will all be displayed at the Planning Committee.

1.3.4 Further details about the development concept and design of the proposal are contained in the accompanying design and access statement.

1.3.5 In addition to these plans the following information which was originally submitted in October 2013, has been provided.

- Affordable housing delivery plan
- Agricultural resources assessment
- Flood risk assessment and drainage strategy
- Green infrastructure strategy
- Non-residential and residential travel plan framework

- Outline management plan
- Report on ground investigations
- Statement of community involvement
- Planning Statement
- Sustainability statement
- Transport assessment
- Utilities infrastructure report
- Utilities statement

1.3.6 The proposal represents EIA development in the context of the Town and Country Planning (Environmental Assessment) Regulations 2011 and therefore the application is also accompanied by an Environmental Statement (ES) and a non technical summary. The ES includes assessment of the following issues:

- Socio economic factors;
- Landscape and visual amenity;
- Archaeology and cultural heritage;
- Ecology and nature conservation;
- Movement;
- Noise;
- Air Quality;
- Alternative sites and options; and
- Cumulative effects.

1.3.7 In addition to the above documents the following information/addendums have been submitted up until April 2014:

- **January 2014**
  Supplementary traffic note
  Supplementary ES movement section
  Addendum to transport assessment
- **March 2014**
  Transport note 21- Highways Agency paramics modelling
  Environmental statement addendum relating to air quality
  Ground conditions evaluations
  Drawings
  Secondary access and bus/cycle access
  Western connection to Kidnappers Lane
  Eastern connection to Kidnappers Lane
  Southern connection to Kidnappers Lane
  Church Road improvements
  Leckhampton Lane traffic calming
  Farm Lane junction visibility splay improvements
  Revised illustrative masterplan
  Revised illustrative design for local centre on Shurdington Road
  Proposed northern connection to Kidnappers Lane - Realignment and priority junction

- **April 2014**
  Additional design and access statement
  Transport note 23-GCC/Atkins Saturn modelling
  JCS update on green infrastructure

Drawings:
Revised character areas plan
Revised maximum building heights parameter plan
Main access drawing

1.3.8 All details submitted have been available to view on the Councils web-page, public access and at the Planning reception area.

1.3.9 Each of these plans and documents will be considered in the relevant sections of the report.

1.3.10 The Council has been in pre application discussions with the applicant since 2012. Up until the summer of 2013 the pre application discussions had been done cross boundary with Tewkesbury Borough Council, at that time the consortium of developers included the Farm Lane land located in Tewkesbury Borough Council. The application has also been informed by a public forum which has been led by the application. This forum included 9 meetings which took place between April 2011 and August 2013.

1.3.11 Local Planning Authorities are, though Legislation, required to determine planning applications within identified timescales. Should applications not be determined within that time period, or within an agreed longer period with the applicant, the applicant has the right to submit a non-determination appeal. Concerns have been made regarding the timing of the application made by both members and the local community is acknowledged, however the Council has no discretion on this point and control the submission of development schemes for determination.

1.4 Relevant planning history

1.4.1 The potential of the site to accommodate development principally for housing has historically been the subject of much scrutiny. However the site has not been the subject of an application of this scale. The most significant and relevant recent planning decisions relate to land adjacent determined by Tewkesbury Borough Council. These include:

1.4.2 **2007**: Outline application at land adjacent to Farm Lane for up to 365 dwellings. The application was the subject of a non-determination appeal against Tewkesbury Borough Council. This application/appeal which Tewkesbury resolved that it would be minded to refuse was dismissed on the recommendation of an Inspector by the Secretary of State on two principal reasons; allowing the appeal would be likely to prejudice the development of the urban extension and especially the delivery of infrastructure necessary to achieve a high quality development and that insufficient open space was proposed.

1.4.3 **2008**: Outline application for a mixed use scheme comprising residential development to a maximum of 350 dwellings on land around Brizen Farm and part of the Farm Lane site. This application was also the subject of a non-determination appeal against Tewkesbury Borough Council. This application which Tewkesbury was also minded to refuse for the principal reasons; inappropriate development in the green belt; impact on the character and appearance locality and the Area of Outstanding Natural Beauty and that the granting of permission in advance of the consideration

of a wider comprehensive development in the locality, as recommended by the then emerging RSS, would prejudice the comprehensive planning of the urban extension. The appeal was later withdrawn.

1.4.4 **2013:** Outline application at Brizen Farm for a development of up to 175 dwellings. This application was refused for the principal reason of being inappropriate development in the green belt and impact on the rural landscape.

1.5 Summary of Statutory consultee comments

1.5.1 The following provides a summary of the comments received; the full responses should be read in full at Appendix 1.

1.5.2 **The Parish Council of Leckhampton with Warden Hill** – Objects very strongly on the following grounds:

- Conflict with the current Cheltenham local plan.
- Pre-emption of JCS.
- Conflict with Neighbourhood Plan and Local Green Space application.
- Harm to the setting of the AONB
- Strong public opposition
- Insufficient provision of schooling
- Flood risk
- Traffic Congestion
- Damage to the Local Economy
- Traffic pollution

1.5.3 **Shurdington Parish Council** – Objects to the application:

- Not comprehensive
- Coalescence between Cheltenham and Shurdington village;
- Impact on the setting of the immediate and surrounding area including AONB
- Traffic congestion and highway safety
- Pre-emption of the JCS
- Flooding
- Aggravate the present issues in the village.

1.5.4 **Tewkesbury Borough Council** – Supports, in principle the location of this site as a strategic location for development. Cheltenham Borough Council should ensure that the appropriate mechanisms are put in place to ensure that the proper planning of the area through the comprehensive development of this site is not prejudiced.

1.5.5 **Highways Agency** – Based on revised information the HA removed its holding order and provided no objection to the application. Regard needs to be given to the JCS.

1.5.6 **Highways Authority** – The development is considered to be acceptable subject to a number of planning conditions and planning obligations.

1.5.7 **Gloucestershire County Council Planning** – No objection subject to on site provision of pre-school a new primary school provision and suitable S106 for contributions to secondary education and libraries.

1.5.8 **County Archaeologist** – Requests that a larger area of the site should be surveyed to allow further Archaeological consideration.

1.5.9 **Environment Agency** – No objection to the principle of the development subject to conditions.

1.5.10 **Natural England** – is not able to comment fully as insufficient information has been provided on landscape and ecological impacts of all the development proposals for this area. Natural England is particularly concerned about the scale of the combined developments and the impact this will have on the setting and the Special Qualities of the AONB. The impact of all the proposals needs to be considered as a whole and not as individual developments. The development therefore has the potential to impact negatively on views towards the Escarpment and from the Escarpment, particularly from important public viewpoints.

1.5.11 **Campaign to Protect Rural England** – Has 3 three principal concerns namely; 1- the effect that this scale of development would have in worsening traffic congestion along the A46 with consequential implications for existing employment in Cheltenham and elsewhere; 2 - the impact that the development would have on the setting of the Cotswolds AONB and the loss of high quality agricultural land. The site is highly visible from the escarpment to the south and in turn the view of the escarpment from the site is a highly-valued feature of this part of Cheltenham, and 3- the principles on which the design and layout have been based. CPRE has also provided a list of JCS policies with key policy requirements.

1.5.12 **Cotswold Conservation Board** – The Board supports the contention of Natural England, together with those shown on the indicative masterplan, are likely to have significant adverse effects on the special qualities of the AONB and the users of the Cotswold Way National Trail.

1.5.13 **Crime Prevention Design Advisor** – General comments provided on secure by design principles.

1.5.14 **Severn Trent Water** – No objection subject to conditions.

1.5.15 **Sport England** – No response

1.5.16 **English Heritage** – No objection

1.5.17 **NHS England** – No response

1.5.18 **Gloucestershire Bat Group** - our records are forwarded to the Gloucestershire Centre for Environmental Records.

1.5.19 **National Planning Casework Unit** - We acknowledge receipt.

1.5.20 **Cheltenham Civic Society** - We appreciate the need for more houses in Cheltenham, and we do accept that this is a suitable site for new housing. Highway matters need to be looked at**.**

1.6 Public comments on the Planning Application

1.6.1 Notification of the application included letters being sent to neighbouring properties, site notices being displayed around the site, together with an advert being in the Gloucestershire Echo. Members of the public have been referred to the Councils web page, and the dedicated page in the planning section which has provided updates on the application since its receipt in October 2013. On receipt of additional information additional site notices have been displayed at the site with the web page being updated to provide links to the additional information. Officers supported a public meeting held on 27th November 2013 which provided the opportunity for members of the public to gain information on the application and set out their concerns.

1.6.2 There has been a significant amount of comments from the public on this application. Over 603 comments have been received, of the comments received 6 are in support, 10 provide observations the remaining 587 providing objection.

1.6.3 Of the objections received, 301 comments have been received on a standard return form produced by Leckhamption with Warden Hill Parish Council. The standard forms objections relate to: The JCS may have greatly over-estimated how many new homes are needed and the application is premature and must not permitted until the JCS is finalised; Traffic Queue on A46; Traffic Congestion in Church Road; Traffic pollution from the A46 traffic queue and Church Road, Risk of Flooding, Lack of sufficient school places; strong public opposition to development and loss of the open green space.

1.6.4 Leckhampton Green Land Action Group (LEGLAG) have provided objection to the application. Entran on behalf of LEGLAG submitted a report in objection to highways and transport matters with Lufton and Associates Chartered Planning Consultants submitting their planning objection. These documents can be read in full in appendix 2 along with all of the public comments received.

1.6.5 The objections received to this application were analysed in order to ascertain the key concerns and points made in each comment received which are as follows:

- 602 Traffic Congestion
- 501 Loss of Green fields
- 447 Pollution
- 430 Lack of school places
- 425 Prematurity/issues with JCS
- 369 Question need for housing
- 367 Highway Danger
- 356 Impact on Wildlife
- 353 Visual and Landscape impact on AONB
- 338 Traffic – Rat running
- 333 Amenity
- 321 Conflict with the Parish Plan
- 284 Lack of infrastructure
- 108 Flooding
- 37 Lack of Medical Facilities

- 24 Not enough Jobs
- 12 Overdevelopment/density too High
- 6 Impact on tourism
- 5 Lack of Sewage
- 4 inadequate local parking facilities supermarket parking
- 3 Impact on Public Transport
- 3 impact on Sports Pitches
- 3 Issue with Landscaping scheme
- 2 Increase in Crime
- 1 no provision for gypsy traveller accommodation

1.7 JCS Comments on the allocation of the site as part of a Strategic Allocation

1.7.1 There has been long standing public engagement in regards to the policy direction that has led to the identification of land at South Cheltenham as a strategic allocation within the Joint Core Strategy (JCS). A total of 284 representations commenting on the allocation of Leckhampton as a strategic allocation within the JCS were received during the most recent public consultation on the draft Plan. Considerable numbers of representations have been received during consultation on earlier JCS documents.

1.7.2 The comments raised reflect those submitted to the planning application.

1.8 The Community Infrastructure Levy Regulations

1.8.1 The Community Infrastructure Levy (CIL) allows local authorities to raise funds from developers undertaking new building projects in their area. The levy is intended to provide infrastructure to support the development of an area, rather than making individual planning applications acceptable in planning terms. Whilst Cheltenham Borough Council has not yet developed a CIL Charging Schedule the regulations place statutory limitations on the use of planning obligations under s.106 in that they must comply with the tests set out in regulation 122.Planning obligations must be:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

1.8.2 As a result of these regulations, Local Authorities and applicants need to ensure that planning obligations are genuinely ‘necessary’ and ‘directly related to the development’. As such, the regulations restrict Local Authorities ability to use Section 106 Agreements to fund generic infrastructure projects, unless the above tests are met. Where Planning Obligations do not meet the above tests, it is ‘unlawful’ for those obligations to be taken into account when determining an application. The need for planning obligations is set out in the relevant sections of the report.

2.0 Policy Context and the Principle of the development

2.1 Policy and Material Considerations

2.1.1 The substantive focus here is on the principle of development of the application site. Planning law requires that applications for planning permission are determined in accordance with the development plan unless material considerations indicate otherwise. The saved policies of the Cheltenham Borough Local Plan Second Review (2006) comprise the adopted development plan, analysis is provided in section 2.2 below.

2.1.2 Material considerations relevant to the application relate to:

- strategic constraints/designations;
- the Tewkesbury Borough Local Plan to 2011 (adopted 2006);
- the emerging JCS and its evidence base;
- the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG)

Consideration needs to be given to each of these considerations and the weight that may be attached to them. This is provided below.

2.1.3 Before consideration is given to each of the above points it is relevant for the purpose of background context to note the draft Regional Spatial Strategy for the South West (RSS). The RSS is not a material planning consideration because it was abolished in 2013. However, because the strategy allocated land at Leckhampton as an Area of Search for an urban extension to Cheltenham, it is part of the development planning history of the site. It is also worth noting that the role of the JCS at its inception in 2008 was to implement the RSS at the local level. The RSS Examination Panel who considered objections to this allocation in 2007 observed that:

> *The low-lying land at issue was originally excluded from the Green Belt in recognition of its development potential, and safeguarded from development at least partly in order to ensure its availability as an option to accommodate future growth of the urban area.*
>
> *The Inspector who held the Inquiry into objections to the Cheltenham Local Plan declined to recommend that the Leckhampton part of the land be given Green Belt status. He recommended instead that it should not be released for housing pending strategic review of development needs, effectively through this RSS process, with interim (and depending on the outcome, more permanent) protection being given by local landscape policy.*
>
> *There is in the Panel's view ample scope to provide for high standards of public amenity and high quality development including family homes, and to provide improved community facilities and public transport. In our estimation, it should be possible to accommodate about 1,300 dwellings in total in the Cheltenham and Tewkesbury Councils' areas while meeting these objectives, and we recommend accordingly. Necessary joint working in this respect is provided for by our recommended Policy J.*

2.1.4 The Panel went on to recommend that the land at Leckhampton be identified in the RSS as an Area of Search. The Secretary of State's proposed changes to the RSS (July 2008) upheld the Panel's recommendations in this respect.

2.2 Cheltenham Borough Local Plan Second Review (2006)

2.2.1 Chapter 4 of the Cheltenham Borough Local Plan 2006 contains Core Policies and Proposals including land allocations. Land at Leckhampton is not allocated. Whilst the plan consists now only of saved policies without their supporting text, the plan as adopted contained a statement at page 62 which set out the Council's position in relation to this unallocated land. In the statement, which reflected the views of the Inspector presiding at the Local Plan Inquiry, the council recognised the intrinsic value of the land as a resource for its recreational, landscape, wildlife and archaeological interest, but said that the land would be reassessed through cross-boundary working as a potential development site within the context of the RSS.

2.2.2 Saved policies in the Local Plan relevant to consideration of the principle of development include those relating to:

- Sustainable Development (CP1, CP3);
- Housing Development (PR1, PR2, HS1);
- Mix of Uses (CP6);
- Landscape Protection and Design (CP3, CO1, CO2, CO7, CO14);
- Flood Risk (CP3, UI1, UI2, UI3);
- Travel Transport and Accessibility (CP5, CP7);
- Infrastructure (CP8).

2.2.3 In considering the application of these policies to the proposal it is important to have regard to section 215 of the NPPF. This says that 'due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)".

2.2.4 Whilst some of the policies in the adopted Cheltenham Local Plan remain of relevance to evaluation of the proposal now being considered, application of them needs to be mindful of two other considerations.

- Firstly, the evidence base underpinning the Cheltenham Local Plan (which has an end-date of 2011), particularly in respect of meeting identified levels of housing need, is out of date and based on superseded data. The evidence base for the JCS now takes precedence. This means that the adopted local plan is not addressing the Objectively Assessed Need (OAN) for growth, a requirement of paragraph 14 the NPPF. In consequence the land allocations in the plan inevitably are inadequate and due to the end-date of the plan (mid 2011) they do not plan for current or future housing needs of the Borough.

- The Council is required to demonstrate a 5 year housing land supply incorporating a 5% buffer. Based on development within the Cheltenham boundary alone, the Council cannot demonstrate an

ongoing 5 year housing land supply, however by working together with Gloucester and Tewkesbury councils through the JCS, we have agreed to a shared housing supply to seek to achieve this. The JCS housing background paper July 2014 is the most recently published indication of Cheltenham's shared ongoing 5 year housing land supply. The housing background paper takes into account the JCS' strategic allocations as a source of housing supply. The paper's trajectory, (which requires updating) predicts that we currently have 5.1 years of housing land supply; parts of the Leckhampton allocation making up 0.2 years of this supply.

2.3 Material planning considerations

Strategic constraints/designations

2.3.1 In allocating land for development regard must be had to:

- the NPPF requirement to meet the Objectively Assessed Need for housing as set out in Policy SP1 of the JCS (see below);
- the sustainable spatial distribution strategy set out in the Pre Submission JCS (Policy SP2); and
- the JCS evidence base which demonstrates that it is not possible to meet all of the identified need by developing land within existing urban or brownfield areas.

2.3.2 In this context, development of land peripheral to the urban areas that is outside the Green Belt is in principle preferable to development of similarly situated land that is within the Green Belt. This is because the Green Belt, as a means of preventing urban sprawl by keeping land permanently open, should be protected for its own sake. Its boundary, once established, should only be altered in exceptional circumstances (through preparation or review of the Local Plan). The sequential approach to the location of development is an important tool in the development which is identified in the NPPF. For example, to locate new built development in the Green Belt, or to release land from the Green Belt requires a local authority or an applicant for planning permission to demonstrate that there are very special circumstances for this decision. In effect, this creates the need to apply a sequential test, to demonstrate that there is no more suitable location for the development which would lie outside the Green Belt. So, if land is to be released from the Green Belt for housing, it would need to be concluded that the housing could not be provided on land within urban areas. The application site is not within the Green Belt. Moreover, there is insufficient developable land within the existing urban area of Cheltenham to meet the objectively assessed need for growth set out in the JCS and as apportioned to each constituent authority.

2.3.3 Whilst the application site is not within the Cotswolds Area of Outstanding Natural Beauty it is in reasonable proximity and its impact upon the landscape is therefore a significant consideration. There will in any event be landscape impacts associated with a development on open land at the edge of the urban area. The application appears to respond well to the

strategic landscape context. The extent of the proposed built form corresponds with areas of low or medium landscape sensitivity. The majority of proposed new build is also located within areas of low or medium visual sensitivity.

2.3.4 The Level 2 Strategic Flood Risk Assessment commissioned by the JCS authorities identified land to the north east of the site as in flood zone 2/3. A later Flood Risk Assessment submitted by the applicant indicates that there are areas to the east and west of the application site associated with water courses that fall within Flood Zones 2, 3a and 3b (functional flood plain). This assessment shows that the flood risk could be mitigated. The Environment Agency agrees with this assessment. In general the outline proposals appear to respond well to the strategic flood risk context, with green corridors retained around the main watercourses.

Tewkesbury Borough Local Plan (2006)

2.3.5 This plan, adopted in 2006 covering a plan period to 2011 includes an allocation for housing development of 360 dwellings on land in close proximity to the application site and included in the JCS strategic allocation (Plan A6) and the RPS Illustrative Masterplan for the wider potential development area. Provisions relating to this land allocation are included in policies HOU1, HOU2 and SD2 of the Tewkesbury plan. The policies require a number of criteria to be satisfied in order to allow development of the land:

- that the wider area has been identified as a sustainable urban extension (specifically by the RSS, although this is now superseded by the JCS);
- that the proposal represents a comprehensive scheme (this is interpreted as meaning comprehensive in relation to other urban extension land in Cheltenham Borough); and
- that the proposal demonstrates satisfactory integration with Cheltenham urban area.

2.3.6 These criteria led to refusal of a scheme proposed on the Tewkesbury Borough land which was upheld at the appeal referred to in the relevant planning history.

2.3.7 While it is recognised that the policies of Tewkesbury Borough Local Plan do not apply to the application site within Cheltenham Borough, the sites are linked by proposals in the Pre-Submission JCS.

2.3.8 If the application is assessed as being likely to prejudice development of a comprehensive strategic allocation then it may prejudice the effective delivery of Pre-Submission JCS Policy SA1. It would also, by association, prejudice delivery of policies in the adopted Tewkesbury Borough Local Plan.

The Joint Core Strategy Pre-Submission

2.3.9 It is important to note that in resolving to consult on the Pre-Submission JCS the council has agreed the principle of development of a strategic

allocation at South Cheltenham, comprised, in part, of land subject of the current application. Having passed through three consultation phases the JCS has now reached an advanced stage in its development (regulation 19). Paragraph 216 of the NPPF says decision-takers may "give weight to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)".

2.3.10 It is the view of the JCS authorities that the Pre-Submission version of the plan should be accorded weight in the determination of this proposal.

2.3.11 The JCS sets out, in policy SP1, the scale of development based upon the OAN for growth over the plan period up to 2031. The spatial strategy is contained in policy SP2 "Distribution of New Development". This policy incorporates the objective of focusing development at Gloucester and Cheltenham including through the allocation of urban extensions.

2.3.12 The Pre-Submission JCS contains a substantial range of policies relevant to consideration of the proposal, several of which effectively update and supplant their counterparts in the adopted Cheltenham Local Plan.

2.3.13 Policy SA1 of the JCS is key to consideration of the proposal. The policy says:

New development will be provided within strategic allocations in order to deliver the scale and distribution of development set out in policies SP1 and SP2.

The strategic allocations are listed in Table SA1 and delineated on Plans A1 to A9 below and are marked on the proposed submission policies map. The red lines on Plans A1 – A9 (not including A7) mark the boundaries of the allocations and are separately and collectively part of this policy.

Proposals must be accompanied by a comprehensive master plan for the strategic allocation. This should demonstrate how new development will integrate with and complement its surroundings in an appropriate manner, in accordance with policy SD5.

Proposals will be required to demonstrate how the provision of new Gypsy, Traveller and Travelling Showpeople sites will be incorporated into development proposals for strategic allocations.

Strategic Allocations which include residential development should seek in all cases to retain and enhance areas of local green space within the boundary of the allocation which meet the criteria in NPPF paragraph 77,

whilst delivering the scale and distribution of development required by this policy. This is in addition to the requirements of policy INF 4.

Development proposals should enable a comprehensive scheme to be delivered across the developable area within each strategic allocation. Developers must engage with the relevant infrastructure regulators and providers to ensure implementation of the Infrastructure Delivery Plan or provision of other necessary infrastructure, as appropriate, and in accordance with policies INF7 and INF8. Developers must ensure that strategic allocations provide an appropriate scale and mix of uses, in suitable locations, to create sustainable urban extensions that support and complement the role of existing settlements and communities.

2.3.14 Plan A6 refers to "South Cheltenham – Leckhampton".
Key points to note from the policy are:

- emphasis on comprehensive development of the entire allocation;
- requirement for comprehensive masterplanning;
- provision of sites for the gypsy, traveller and travelling showpeople communities;
- appropriate scale and mix of uses;
- retention and enhancement of areas of local green space;
- provision of infrastructure and implementation of the Infrastructure Delivery Plan.

2.3.15 The proposal will be required to address all the above criteria together with any other relevant policy requirements in the plan. For the avoidance of doubt, comprehensive development of the allocation, which is within both the Tewkesbury and Cheltenham administrative areas, encompasses the provision of sites for the gypsy, traveller and travelling showpeople communities.

2.3.16 The requirement to retain and enhance areas of local green space must be considered within the permissive JCS policy context of comprehensive development of the area. Within this context and having regard to JCS policy INF4, the proposal appears on its face to make reasonable and proportionate provision, however this has not been tested within the context of a potential future designation of land as local green space as defined by the NPPF. Work is currently being commissioned to assist communities in this process- this will not be completed within the determination timescale of this application. It is not a matter for the developer to formally allocate or designate Local Green Space – this must be done by the Local Planning Authority through its development plan whilst having regard to paragraph 77 of the NPPF. The appropriate part of the development plan for this designation is the emerging Cheltenham Plan and, where necessary in the context of the entire strategic allocation, the emerging Tewkesbury Plan.

2.3.17 It should also be noted that two previous JCS public consultation documents ("Developing The Preferred Option" and the "Draft for Consultation") referred to the area containing the application site as a potential strategic allocation. Policy SA1 of the Pre-Submission version of the JCS now allocates the strategic site.

2.3.18 Members are reminded of paragraph 1.611 regarding the timing of this application.

The National Planning Policy Framework

2.3.19 References are made throughout this advice to the NPPF. By way of a resume, key elements of the NPPF in relation to this proposal are contained within paragraphs 14, 17, 47, 49, 215 and 216.

2.3.20 For decisions on planning applications there is a presumption in favour of sustainable development in paragraph 14 of the NPPF. Unless material considerations indicate otherwise this means:

- approving development proposals that accord with the development plan without delay; and

- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:

    - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
    - specific policies in this Framework indicate development should be restricted.

2.4 Comprehensive development and prematurity

2.4.1 The applicant has through the submitted ES and submitted documents has not looked at its site in isolation, detailed regard has been given to the wider strategic allocation A6 as identified in the pre submission JCS at Policy SA1. The ES and supporting information includes consideration of the impact of the proposed development, requirements and mitigation required to bring the larger strategic allocation forward which includes highways, flooding, infrastructure provision, education, community facilities. Clearly there are elements of each individual scheme to provide for beyond this application site. However, matters of comprehensiveness and the need for each scheme to contribute fairly to the overall requirements of the strategic allocation are important to allow compliance with CIL requirements (see paragraph 1.8. It is possible for these requirements to be secured though suitable wording in the S106 agreement. Based on the submitted application together with the detailed negotiations between the applicant, Council and relevant infrastructure stakeholders there is no reason to doubt that a comprehensive development can be delivered.

2.4.2 Paragraph 14 of the NPPF confirms that decisions should be taken in accordance with up-to-date development plans and, in their absence, promotes generally granting permission. The nPPG provides that prematurity is unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the NPPF and any other material considerations into account. For this application the site area is within a Strategic Allocation Area as defined in the pre submission JCS, with the application seeking to ensure it provides for the comprehnsive developement of the Strategic Allocation.

2.5 Principle of Development – Conclusion

2.5.1 Despite their age, several policies in the adopted Cheltenham Borough Local Plan are not out of step with the NPPF or the emerging development plan and they remain relevant to consideration of the proposal. However, caution needs to be applied in considering the weight that can be attached to the adopted Plan given its age, nature and evidence base.

2.5.2 Following the Local Plan Inquiry in 2004 the Inspector recommended that whilst the land at Leckhampton should not be included within the Green Belt it should also not be released for housing pending strategic review of development needs. That assessment was undertaken through the RSS process and more recently through the JCS.

2.5.3 The housing needs evidence base underpinning the Local Plan is out of date, paragraph 49 of the NPPF applies requiring housing applications to be considered in the context of the presumption in favour of sustainable development. In this context what needs to be considered is (a) whether the adverse impacts of allowing the proposal would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF taken as a whole or (b) whether specific policies in the NPPF indicate development should be restricted.

2.5.4 Taking (b) first, the restrictions relevant to this planning application are Green Belt and AONB. The site is not in the Green Belt and there is no recommendation to extend the designation to include it, detailed analysis of the Green Belt Boundary has taken place though the preparation of the JCS. In relation to the AONB, the NPPF focuses on restricting development *in* the AONB not outside of it. As previously noted however, the proximity of the site to the AONB means that matters of design, layout and landscaping are very important factors to be considered in assessing the acceptability of the proposal. Policy SD8 of the Pre-Submission JCS is of particular relevance here as are SD5 and SA1 for example together with CO2 of the adopted Local Plan.

2.5.5 In assessing (a), the JCS is required to be in conformity with the NPPF. The land subject of the planning proposal is part of a strategic allocation in the Pre-Submission JCS as set out in policy SA1. In relation to the assessment of the proposal against the policies of the NPPF as a whole, it may be argued that provided it accords with JCS policies it accords by default with the NPPF.

2.6 Conclusion

2.6.1 The JCS is at an advanced stage of preparation, the pre submission document has been approved by three authorities separately. And the site allocations within it are there to serve a strategic as well as local purpose. Weight should be attached to it in decision-taking. The application site forms part of an urban extension allocated in the JCS. Getting to that stage has entailed the assessment and evaluation of a significant amount of evidence over a number of years, including landscape and visual impact assessment, review of the Green Belt, assessment of flood risk and Sustainability Appraisal together with public consultation and analysis of

issues raised. In resolving to submit the plan for examination the council has agreed the principle of development in this area. On balance, having regard to the material considerations outlined above no objection in planning policy terms is made to the principle of development in this area.

3.0 Landscape and visual Impact

3.1 Introduction

3.1.1 One of the planning principles of the NPPF is that the planning system should recognise the intrinsic character and beauty of the countryside. Section 11 of the NPPF sets out that the planning system should contribute to and enhance the local environment by, inter alia, protecting and enhancing valued landscapes. Policy CO1 of the Local Plan sets out that in considering landscape character, development will only be permitted where it would not harm; (a) the attributes and features which make a significant contribution to the character, distinctiveness, quality and amenity value of the and landscape; and; (b) the visual amenity of the landscape. It is considered that policy CO1 is consistent with the NPPF. Policy CO2 seeks to resist development which would harm the natural beauty of the landscape within the AONB

3.1.2 Policy SA 1 of the Pre Submission document of the JCS provides its Strategic Allocations Policy; SA1 includes allocation A6 which identifies South Cheltenham to provide a development of 1,124 houses. To note, policy SD8 seeks to ensure that where developments are proposed nearby or adjacent to the AONB that proposals will be required to conserve, and where appropriate, enhance its landscape, scenic beauty, wildlife, cultural history of other special qualities.

3.1.3 The NPPF focuses on restricting development in the AONB not outside of it. As previously noted however, the proximity of the site to the AONB means that matters of design, layout and landscaping are very important factors to be considered in assessing the acceptability of the proposal.

3.1.4 The application has been supported (within the ES) with a Landscape and Visual Impact Assessment (LVIA) which considers the effects of the development on the landscape and visual resources of the site and the surrounding area. The content of this assessment was discussed at length by officers and the applicant prior to the submission of the application and it is advised that the methodology and criteria adopted within the assessment follows nationally recognised guidelines.

3.1.5 There are strong public concerns on the impact the proposed development may have on the setting of the AONB along with objections received from Natural England, CPRE, Cotswold Conservation Board, and Parish Councils.

3.2 Consideration

3.2.1 The Councils Landscape Officer has considered the application. The layout of the proposed development generally accords with the recommendations

for developable areas shown in the JCS *'Landscape & Visual Sensitivity and Urban Design Report'* which form part of the evidence of the JCS. The developable areas are derived from a Landscape and Visual Sensitivity Appraisal, described in the same report.

3.2.2 The LVIA deals with a wider Masterplan Area, but only those parcels of land which are the subject of the current planning application are considered here.

3.2.3 A LVIA is concerned with the impact of a proposed development on both the *landscape character* of an area and the *visual amenity and appearance* of the area. The LVIA submitted with this planning application mostly addresses these impacts at the localised level of the proposed development. The sensitivity of the landscape at a broader scale is considered in documents produced for the evidence base of the Joint Core Strategy including the Landscape & Visual Sensitivity and Urban Design Report *(pp 14-17),* Landscape Characterisation Assessment and Sensitivity Analysis *(p ii-iv; p 50; p 61)* and Strategic Allocations Report *(pp 74-75)*.

Landscape Impact Assessment

3.2.4 The Landscape Impact Assessment addresses direct and indirect impacts on both landscape features (e.g. trees, hedgerows) and local landscape character. The application site contains a number of landscape features, the most significant trees and hedgerows of which it is proposed to retain and enhance to form the basis of the structural landscape of the proposed development. Should planning permission be granted, this approach to the design of a landscape scheme is to be welcomed.

Landscape Character

3.2.5 The application site is located in character area SV 6B, Settled Unwooded Vale, as described in the *Gloucestershire Landscape Character Assessment* (*Ref. 3*). Although the site does not lie within the boundary of the Cotswold AONB, it forms part of the setting of the AONB.

3.2.6 In order to assess the impact on landscape character, the LVIA divides the application site into two local character areas (CA1, land to the front of the site at Shurdington Road stretching south to the middle, and CA2, stretching from the middle of the site to southern site boundary). The current boundary between CA1 and Shurdington Road is a hedge of varying height. Where the hedge is lower, expansive views are afforded of the Cotswold escarpment, with its setting of Settled Unwooded Vale in the foreground.

3.2.7 The ES states that development in the north of the application site (CA1 and part of CA2) would have a negligible impact on the character of the wider setting of the AONB. However, the Impact Assessment concentrates on landscape features i.e. impacts on landscape *character only within the* application site. When this land is considered as the setting to the escarpment, itself a special quality of the Cotswold AONB, it will have a more than negligible impact. Mitigation proposals have been incorporated within the scheme to reduce the impact the development would have on the setting of the AONB.

3.2.8 The mitigation includes retaining Lott's Meadow, in CA2, as strategic open space and a landscape buffer to the AONB. Along Shurdington Road it is proposed to set back the buildings from the footway and to create vistas through the development to the Cotswold escarpment. An area of green space, incorporating balancing ponds, has also been allocated, comprising about one third of the frontage along this section of the road. A number of existing landscape features within the application site are being retained which will help lend local character to the proposed development.

Visual Impact Assessment

3.2.9 The Visual Impact Assessment describes views of the site from each viewpoint and assesses the impact of development on each view. It concentrates on views of the site. It would have been helpful if it had given greater consideration to the impact of the proposed development on views of the Cotswold AONB. View Point 5 is located on the Shurdington Road, at a point where the boundary hedge is low, so there are open views of the site with the Cotswold escarpment in the background. A development would therefore alter the view of hedgerows and pasture to built development. Any development will therefore have an impact and therefore it is important to ensure this impact is acceptable.

3.2.10 In order to mitigate for this loss of view, a gap has been created in the built development edge along Shurdington Road. As mentioned above, it is about a third of the length of this section of road and should create an accessible viewpoint towards the escarpment. To soften the street scene, tree planting and other landscaping is planned and the buildings have been set back from the footway. These mitigation measures, together with other proposed landscaping, will help to integrate the built development into its landscape.

3.3 Conclusion

3.3.1 The site has been allocated within the Pre Submission JCS as part of the South Cheltenham Strategic Allocation through which there has been significant landscape and visual impact assessment carried out. The proposal would be visible from public vantage points within and outside the AONB, therefore the main consideration relates to if the proposal submitted achieves the requirements to minimise and mitigate its impact when viewed from public vantage points within and outside the AONB.

3.3.2 Development by its nature will impact upon the setting of the AONB. The main view through the site towards the escarpment of the AONB is where the site bounds the A46 Shurdington road. To help mitigate the effect of the development on views at this point, it is proposed to set the buildings back from the footway, and to create green space and vistas through the development using the green corridors. Views from the AONB will be minimised through the creation of strategic open space and Lott's Meadow and a landscape buffer to the AONB along with Green Infrastructure within the development site which will help to minimise impact.

3.3.3 The Landscape Officer concludes that the landscape mitigation measures proposed in the Masterplan and Green Infrastructure Parameter Plan will help to integrate the proposed development into the surrounding landscape

and reduce its impact on the setting of the Cotswold AONB. Should planning permission be granted, vigilance will be required during the development management process to ensure that these mitigation measures are not compromised as detailed plans emerge. The proposal will therefore ensure that the development will have an acceptable impact on the AONB, and therefore complies with the NPPF, pre submission JCS and Local Plan Policies.

4.0 Design and Layout

4.1 Introduction

4.1.1 The NPPF sets out that the Governments attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people and creating a sense of place. The NPPF also advises that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Major applications for new housing are required to include a design and access statement explaining the design rationale. Policy CP7 of the local plan seeks to achieve good design, with policy CP4 requiring no harm to the amenity of adjacent land users. Both these policies are in accordance with the NPPF.

4.1.2 Policy SA 1 of the JCS Pre submission requires that proposals must be accompanied by a comprehensive master plan for the strategic allocation. This should demonstrate how new development will integrate with and complement its surroundings in an appropriate manner, in accordance with policy SD5 Design requirements. Strategic Allocations which include residential development should seek in all cases to retain and enhance areas of local green space within the boundary of the allocation which meet the criteria in NPPF paragraph 77, whilst delivering the scale and distribution of development required by this policy. This is in addition to the requirements of policy INF 4 Green Infrastructure.

4.1.3 Primary access points are proposed to be determined in this current application; matters relating to appearance, landscaping, layout and scale are reserved for future consideration. The application has been supported with a Design and Access Statement (DAS), an illustrative master plan and parameter plans, other illustrative plans have also been provided which elaborate on the indicative layout in respect of land uses, house density, building heights, access and movement, green infrastructure and phasing. These plans provide an indication as to how the site could be developed. These documents would be used to inform the submission of any subsequent reserved matters applications.

4.1.4 Urban designers and landscape architects from both Cheltenham and Tewkesbury Borough Councils have been in discussion with the developer's urban design team throughout the pre application process and ongoing engagement post receipt of the application. The discussions were initially based on a masterplan for the whole of the JCS Strategic Allocation area around Kidnappers Land and Farm Lane, which includes land beyond the boundary of this application site. Nevertheless the negotiations hold good for this application and over recent months have focussed in on it. This

section of the report includes discussion of landscape and transport in so far as they impact on urban design considerations, wider considerations are dealt with as sections 3 and 5

4.1.5 The aim of urban design intervention here is related to place-making, with a view to helping create:

- a pleasant and sustainable place to live;
- a place that links well with and respects its immediate neighbours and wider setting
- a place that makes a positive contribution to the quality of south Cheltenham

4.1.6 This is a sensitive site on the edge of the built up area, below the Cotswold scarp (which is part of the AONB and of which there are expansive views into and out of). If the site is to be developed, contextually it is important that the development proposals mitigate impact. This landscape and visual impact is considered in more detail in section 3 of this report.

4.1.7 The built context is mixed. Immediately to the north, west and east is residential development (frequently estate development) from the 1960s-80s. The JCS strategic allocation itself contains a scattering of development, some commercial (nurseries etc.) some residential and undeveloped land in a variety of low impact used (recreation, small-holding etc.) Beyond the immediate area – along Church Road to the south and south east and Shurdington Road/Bath Road to the north and northeast – start elements of historic development – including village outliers and Victorian development; Victorian suburbs and outliers of Regency estates. The built form varies from villas and larger detached through semi-detached to humbler terraces. Materials include red brick, stone and render.

4.1.8 Uses are typical of residential estate development, predominantly residential, with community uses, play space, allotments; retail is catered for in the Bath Road and on a number of local and neighbourhood centres.

4.1.9 The outline proposal as set out in the DAS (September 2013, plus Addendum April 2014) broadly reflects discussions to date on Urban Design issues.

4.2 Consideration

General layout

4.2.1 The arrangement of built-up areas and green-infrastructure is logical; concentrating building on less visually sensitive land; minimising incursions into more sensitive areas; and establishing green fingers running through the site along watercourses. Whilst the expansive view of the scarp from the Shurdington Road frontage will be reduced as set out in section 3 of this report, the mitigation strategies are considered in paragraph will help to retain, albeit less expansive, views. The mitigation strategy is set out in paragraph 3.2.8 and 3.2.10.

4.2.2 The general distribution of uses seems appropriate. The “local centre” with retail, employment, school etc is adjacent to Shurdington Road – an accessible location which is a focus for much of the movement in this part of the site. It is also sensible to shift these uses to the western most part of the Shurdington Road frontage in order to give some balance to the community hub formed by Bath Road. The current proposed arrangement which places housing on the Kidnappers Lane/Farm Lane frontage is an improvement on previous iterations, which showed various community uses on this edge. The community hub is now shown as a landscaped square with parking – an improvement on earlier suggestions which had a fairly anonymous entry along a road lined with community uses.

Design Principles

4.2.3 The application is in outline, but the DAS offers an understanding of how the detail might be realised through a set of design principles and a series of layout drawings and precedent images. These suggest that streets and squares will be well landscaped, attractive places and that built form will follow traditional vernacular styles.

4.2.4 The layout diagrams, read with the written design principles, offer a reasonable understanding of the design intentions for the scheme. They suggest a degree of quality in the finished product. However, they are not developed to a detailed level, and there is a need to be cautious about the deliverability. It would be helpful to have a series of “typology” drawings which demonstrate, for example, typical street cross-sections and plans, but should members resolve to grant planning permission a condition can be attached to require this information to be provided at reserved matters. These plans can then be used to demonstrate the ability to deliver avenue planting, ease of cycle and pedestrian movement and other elements which make a well-designed and comfortable street. There is a written description of acceptable parking typologies (on-plot, on-street or in street-based courts or squares; not in rear courtyards); again, typology drawings can be secured though conditions to demonstrate how these strategies will work in areas of varying density at reserved matters. Conditions on any outline permission need to be used to protect the intent of the DAS and to guard against the potential for a gradual diminution of green infrastructure and public realm - a common occurrence in moving from masterplan to detailed application.

4.2.5 The DAS does set out a series of principles which follow good urban design practice – a set of principles which reflect Cheltenham’s historic urban design parameters – covering topics including:

- Neighbourhood identity and character
- Continuity and enclosure of streets by built form
- Quality public realm
- Ease of movement for pedestrians and cyclists
- Legibility

Development layout

4.2.6 Development layout is proposed in a series of perimeter blocks and design principles establish back-to-back distances between housing, how buildings

will front streets, treatment of corners. The general approach and the design principles set out are acceptable. There are a number of distinct benefits in this approach to urban form:

- ease of movement around the site – particularly for pedestrians and cyclists;
- clear definition of private and public spaces - a benefit in terms of amenity;
- passive surveillance of streets and public open space – a benefit in terms of security;
- efficient use of space;
- efficient provision of parking;
- a reflection of Cheltenham's historic Regency and Victorian layout.

4.2.7 The alignment of the blocks (with a predominantly north to south axis and one main east-west cross street) relates well to the alignment of linear green spaces (following watercourses) and the alignment of view corridors to the scarp.

Housing densities

4.2.8 Housing densities vary across the site; they are acceptable in principle and are not untypical of the range of nearby historic densities:

- 40-55dph fronting Shurdington Road;
- 33-40dph in the centre;
- 25-33dph on the western, southern and eastern edges.

Building heights

4.2.9 Building heights are acceptable and, again, not dissimilar to historic development nearby:

- southern, eastern and western edges are restricted to a maximum of 2-storeys;
- central areas are restricted to a maximum of 2.5 storeys, with a stipulation that no more than 20% of these should be at the maximum height (i.e. 80% will be no more than 2-storey);
- the local centre can reach 3-storeys.

Sustainable transport

4.2.10 Transport options are accommodated by the provision for bus access into the site. Walking and cycling to facilities at Bath Road and Leckhampton (both a comfortable cycle distance) are available via Shurdington Road; Church Road offers a rural cycle route towards Leckhampton and the wider network; there are pedestrian-only links to Merlin Way and Burrow's Field – though these aren't available to cyclists. Internally, the block structure creates a permeable layout which is suited to easy walking and cycling.

House types and building design

4.2.11 Housing types and building design is addressed through a series of precedent images which are included in the DAS. Through pre application discussion and ongoing officer engagement the suggested housing types have been amended. The suggested house types still need considerable

work undertaken to ensure that the building styles suggested deliver a high quality finished design. These matters would be resolved through reserved matters applications.

Local centre

4.2.12 The local centre is laid out around a landscaped parking square and accommodates the main entrance to the site from the south west. Uses enclosing the square include retail, office and surgery; the primary school is just off the square on the main access road. The arrangement appears to work well. There has been on-going discussion regarding the suitability of rear-servicing the larger retail unit on the west of the square from the stopped up route of Kidnappers Lane. Whilst the proposed arrangement may be capable of being delivered acceptably, officers continue to consider that an improved arrangement using front servicing (from the square) and applying a landscaped treatment to the stopped up road would be an improvement in terms of neighbour amenity.

Green infrastructure

4.2.13 Having regard to JCS policy INF4, the proposal appears on its face to make reasonable and proportionate provision, however this has not been tested within the context of a potential future designation of land as local green space as defined by the NPPF. Work is currently being commissioned to assist communities in this process- this will not be completed within the determination timescale of this application. It is not a matter for the developer to formally allocate or designate Local Green Space – this must be done by the Local Planning Authority through its development plan whilst having regard to paragraph 77 of the NPPF. The appropriate part of the development plan for this designation is the emerging Cheltenham Plan and, where necessary in the context of the entire strategic allocation, the emerging Tewkesbury Plan.

4.2.14 The application has been submitted with a detailed Green Infrastructure strategy which sets out that of the site area if 33.44ha, 14.9ha will be retained or incorporated as green space, approximately 44% of the site, with the majority of proposed new build is also located within areas of low or medium visual sensitivity.

4.3 Conclusion

4.3.1 There has been extensive discussion between officers and the applicant on both this outline scheme and the masterplan within which it fits. These outline proposals suggest that there is the basis of a successful development here. There is a strong set of urban design principles supported by written and drawn information which should deliver a comfortable place to live. The disposition of uses and use of a perimeter block approach and permeable street layout suggests that the site itself should work well. There are areas which require further work which is typical of an outline application in which appearance, landscaping layout and scale are reserved. The DAS does however suggest that the intent is to deliver a high quality place. Therefore, if approved, suitable conditions should be put in place to ensure a quality scheme is delivered though any future reserved matters applications.

5.0 Sustainable Transport and Highway Safety

5.1 Introduction

5.1.1 Traffic maters are one of the issues which have caused the highest level of concerns from local residents. This section sets out Gloucestershire County Council Local Highways Authority (GCCLHA) comments on the application. Their comments are set out in fall in the Statutory Consultee comments in Appendix 1 at the rear of this report.

5.1.2 It is important to note that the proposed development cannot be expected to mitigate for existing traffic problems.

5.1.3 Following initial discussion with the GCCLHA, Officers requested that in providing their comments consideration should be given not only to the impact of this application for 650 dwellings but also the cumulative impact of the remainder of the strategic allocation, along with the other strategic allocations identified in Policy SA1 of the pre submission JCS. The following paragraphs provide GCCLHA summary comments and conclusion on the application therefore the comments below should be read in conjunction with the full comments at Appendix 1.

5.2 Gloucestershire County Council Comments:

5.2.1 Gloucestershire County Council as the local highway authority has assessed this application in light of the NPPF, the CBC local Plan, and the emerging JCS, and other material considerations. In determining the type of recommendation the highway authority needs to assess if;

- the residual cumulative impact from the application is severe
- safe and suitable access for all can be achieved
- the opportunities for sustainable transport modes have been taken up
- any adverse impacts do not significantly and demonstrably outweigh the benefits of allowing the proposal

5.2.2 The applicant has used the SATURN strategic model as described earlier and local junction modelling techniques to understand the wider impact and the local capacity issues.

5.2.3 **Wider Strategic Impact** - The SATURN traffic modelling shows what happens if traffic travels along corridors of least resistance, and plots which routes that may be taken to avoid delays. The results shown that the best scenario is not to restrict flows on Leckhampton Lane, but allow traffic flow to balance along the corridors in Shurdington, Up Hatherley and Leckhampton.

5.2.4 **Local impact** - In is inevitable that this development will increase the number of vehicle trips onto the network. Primarily during the am and pm peak. The developer has sought to use containment and travel pattern plans to either reduce peak hour travel, or amend daily travel patterns to maximise the capacity of the highway corridors. The A46 is an important route from the A417 to the A46, and is busy during predominately 2 distinct

weekday periods, nominally 7am – 8 am and 4pm – 6 pm (GCC survey data April 2013).

5.2.5 Using this traffic data we can see that the A46 is relatively free flowing for 19 hours a day. During these remaining 5 hours, the A46 experiences queuing, of varying degrees.

5.2.6 It is perhaps worth understanding queuing and congestion. Congestion can be defined as an increase in the level of traffic flow, causing the average speed of vehicles to reduce. There are several types of congestion.

Recurrent congestion; this is a regular occurrence such as peak hour congestion or regular events.

Non-recurrent congestion—this is unexpected occurrences such as accidents or vehicle break-down.

Pre-congestion or borderline congestion—this is where vehicles have slowed, but are not actually affected by the congestion, such as before and after peak times, or approaching a congested area.

This report looks at recurrent congestion.

5.2.7 The A46 experiences recurrent congestion. Congestion leads to delays in journeys and unreliability in journey times. Slow and stationery traffic can have an effect on air quality. Therefore congestion can affect the economy, quality of life and the environment. However we need to measure the existing queuing and congestion, and determine what the impact of this development, and whether that impact is severe.

5.2.8 Two junctions (Moorend signals and A46/Leckhampton Lane) are noted to currently have capacity issues and this development will add to the performance of these junctions. However the development is only required to mitigate its own impact, and not any existing capacity issues.

5.2.9 From the traffic survey data these situations of congestion are relatively short lived and unlikely to translate into severe congestion, in terms of the NPPF.

5.2.10 Once again, this is not to say that there would be no queuing, but delays should be of relatively short duration and certainly not of such significance as to amount to a severe delay. In the off-peak no particular problems are predicted under normal conditions.

5.2.11 Some of the minor roads on to the A46 do experience queuing and this would be expected onto any Primary/Principal road. But the highway authority prioritised the A46 flows as unhindered as possible, especially to accommodate bus frequencies, and the sake of relatively small queue lengths on minor side roads.

5.2.12 Sever Impact - The NPPF states that; Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. Obviously the use of the term severe has been to convey something very extreme, to ensure that authorities only prevent development on transport grounds in overwhelming conditions. To

try and understand how you might calibrate severe in transport terms might be to look at how government pinch point funding is allocated. Pinch point funding seeks to remove bottlenecks on the local highway network which are impeding growth. The fund reflects the government's commitment to supporting economic growth by tackling barriers on the local highway network that may be restricting the movement of goods and people. The fund is aimed at those schemes that can be delivered quickly with immediate impact. No Pinch Point funding was sought for Shurdington Road, due to its relatively low ranking, strategically in Gloucestershire.

5.2.13 The application has been considered in the context of JCS and on the basis of the strategic allocation A6. The applicant is therefore required to contribute fairly to the overall requirements to allow the strategic allocation to be brought forward which can be secured in the S106.

5.3 Conclusion

5.3.1 The highway authority is satisfied that subject to the recommended conditions and contributions a safe a suitable access for all can be achieved, the cumulative impacts of the development are not severe, and the development will actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, to be made more sustainable.

6.0 Affordable Housing

6.1 Introduction

6.1.1 Local Plan Policy HS4 provides that the Council will seek to negotiate with developers to provide 40% of the total number of dwellings proposed for affordable housing. It is considered that this policy is consistent with the objective of the NPPF which encourages local planning authorities to identify the size type, tenure and range of hosing that is required in particular locations.

6.1.2 Pre-Submission JCS policy SD13 deals with affordable housing, and requires developments of sites with sites of 10 or more residential units to deliver 40% affordable housing.

6.1.3 The Affordable Housing Statement submitted with the application proposes that up to 40% of dwellings (up to 260 dwelling) would be provided with a tenure split of 70% as affordable rented and 30% as intermediate affordable housing. The proposed mix of dwellings proposed includes 13 one bedroom units; 130 two bedroom units; 104 three bedroom units; and 13 four bedroom units.

6.2 Consideration

6.2.1 Following discussions with the Housing Enabling Officer it was advised that provision of 40% affordable is consistent with the identified need along with the tenure split of 70/30. However it was also advised that the mixture of

properties to be provided to provide for identified local need should be amended to include the following mix; 13 one bed units; 122 two bedroom units; 91 three bedroom units and 21 four bedroom units.

6.2.2 At the time of writing this report discussion are ongoing on these requirements, however positive steps are taking place moving towards reaching an agreement.

6.3 Conclusion

6.3.1 The affordable housing provision is subject to discussions on the detail, however the principle agreement of 40% provision with a 70% as affordable rented and 30% as intermediate affordable housing. Once the detail is agreed with the Housing Enabling Officer it will be secured though the S106. The S106 will ensure that the affordable provision is provided at the appropriate time and to be located at appropriate positions though the development site. Subject to agreement being reached, the affordable provision will meet the provision requirements of both the local plan policy and the JCS

7.0 Flood Risk and Drainage

7.1 Introduction

7.1.1 The NPPF aims to direct development away from areas at highest risk of flooding. Development should be safe and should not increase flood risk elsewhere. Local Plan Policies CP3, UI1 and UI2 reflect this advice with Policy UI3 requiring that development proposals require the incorporation of Sustainable Drainage Systems (SUDS). These local plan policies are considered to be consistent with the objectives of the NPPF. Policy INF3 of the Pre Submission JCS also seeks to achieve the objectives of the NPPF.

7.1.2 There has been a significant level of objection to the application based on flooding concerns. It is stated that the site and the surrounding area frequently floods. Photographic evidence has been provided by some objectors. Reference is also made to the 2007 where flood water overtopped the A46 and flooded a number of residential properties. It is suggested that the proposed development would create an unacceptable risk of flooding and would also increase the risk of flooding beyond the site.

7.1.3 The application has been accompanied with a Flood Risk assessment (FRA) and drainage strategy. To note this document does not only consider the land within the red line of this application, it reviews the larger urban extension area and potential effects of tidal, fluvial, surface water, ground water and sources of flooding upon the proposed development and flood risk from the development to third parties.

7.2 Consideration

7.2.1 The Environment Agency (EA) maps indicate that the site is predominantly within Flood Zone 1 with small areas of Flood Zones 3 and 2. The Level 2

Strategic Flood Risk Assessment commissioned by the JCS authorities did identify land to the north east of the site as in flood zone 2/3. However the Flood Risk Assessment submitted by the applicant indicates that there are areas to the east and west of the application site associated with water courses that fall within Flood Zones 2, 3a and 3b (functional flood plain). This assessment shows that the flood risk could be mitigated. The Environment Agency has stated that their maps are indicative and that the applicants more detailed assessment and modelling shows that the flood risk can be mitigated. Consequently, the Sequential Test would be passed and the Exceptions Test would not be required.

7.2.2 The application site is on clay and is served by principal watercourses that flow northwards though it. Mitigation of the development surface water will be disposed of to these watercourses via 4 sets of attenuation ponds designed to the 100year standard, with extra storage allowed for to take into account increased rainfall resulting from climate change over the lifetime of the development at plus 20% for commercial development and plus 30% for residential. The four ponds are to be located to the north of the site adjacent to the A46 with 3 located centrally (ponds A, C and D) and one located to the east (pond B). Pond A would drain to Hatherley Brook and would serve the land area bounded by the brook, Shurdington Road, Farm Lane and Kidnappers Lane. Pond B would drain to existing brook running on the north east boundary of the application site and serve the land at the natural catchments divide of pond C and D and the strategic open space proposed to the south. Ponds C and D would drain to Hatherley Brook and serve the land bounded by the brook, Kidnappers Lane the south boundary of the site, the natural dividing line between pond B and Shurdington Road (to note pond C is drained in to pond D).

7.2.3 The submitted FRA in sections 9 and 12 set out in details how each of balancing pond attenuation measures will be design to achieve discharge at a controlled, low rate to the existing watercourse, which complies with the requirements of the NPPF on flooding. The new surface water drainage system will ensure that the development does not raise flood risk down stream, and that the quality of surface water discharge is high. The rate of run off from the site rainfall up to and including the worst climate changed 100 year event will be reduced as a result of the development, principally due to the large volume of surface water storage that will be installed between the developments surface water collection system and the watercourses.

7.2.4 The applicant has held discussions with Severn Trent Water who have agreed the maximum rate at which sewage from the development can be disposed of to local foul sewers. Severn Trent has been consulted and has raised no objection.

7.2.5 The FRA also sets out the importance of the regular upkeep and maintenance of the ponds and the overall drainage strategy. The applicant has agreed that this will be secured through a management strategy which will be required and controlled, in perpetuity or the lifetime of the development through the S106 agreement.

7.2.6 The Councils Engineer Officer has made comments on the application in reviewing the Flood Risk Assessment and Drainage Strategy submitted with this application concluding he is satisfied with its approach and concurs with

its recommendations and conclusions. I would also reiterate the comments made by the Environment Agency that all SuDS be designed in accordance with CIRIA guidance C697 - The SuDS Manual.

7.3 Conclusion

7.3.1 It is of note that the EA has fully considered the FRA and has not raised any objection to the principle of the proposed development. The EA does note that as this is an outline application additional work is still required, however these are not principal matters and can be agreed at reserved matters stage and controlled through conditions which they have recommended. The Borough Land Drainage Officer has also considered the application and is in agreement with the EA conclusions.

8.0 Community facilities, Open Space, Outdoor Recreation and Sports Facilities

8.1 Introduction

8.1.1 The NPPF sets out that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well being of communities. Policy CP8 of the Local Plan seeks to ensure that developments provide for the necessary infrastructure and facilities required which is consistent with the NPPF.

8.1.2 Local Plan Policies RC5, RC6 and RC7 relate to development on amenity space, and the provision of public play space and amenity space in new developments. Policy RC1 sets the overall minimum local standard for outdoor playing space at 2.65 per 1000 population of which 1.75ha should be sports pitches. New outdoor facilities should be generally subdivided as follows: 1.85-1.96ha youth and adult outdoor playing space for sport and 0.6 – 0.8ha children's outdoor playing space.

8.1.3 The JCS at Policy INF5 requires social and community infrastructure to be provided. Policy SA1 in identifying the Strategic Allocations sets out that development should implement the Infrastructure Delivery Plan or provision of other infrastructure set out in policies INF7 and INF8.

8.2 Consideration

8.2.1 Based on the local plan policy a proposal for 650 dwellings would require a minimum of 2.77ha of youth adult playing space and 0.898ha of children's outdoor playing space. The illustrative layout shows provision is to be made for 7.48ha of strategic open space and 6.38 of other open space within the development. Children's play provision is proposed within the application site comprising a Neighbourhood Equipped Area for Play (NEAP) and 3 Local Equipped Areas for Play (LEAP) and an area for kick about. Youth and Adult provision is to be though the use of the primary school field (0.85ha) and the proposed Multi Use Games Area (MUGA) which would

have an all weather surface which triggers a multiplier of 3 as it would provide mutable usage and availability compared to grass. Further provision has been identified at Lotts Meadow. Allotments are also proposed for the site which are shown located at the back of Vineries Close. A community orchard is also located adjacent to the allotments, The Parks Officer has however provided justifications to request that land be utilised for additional allotments. The applicant has agreed to make this change.

8.2.2 Of the overall site area of 33.44ha, 14.9ha will remain as open space/green infrastructure, 44% of the application site. In considering the breakdown of the open space, outdoor recreation and sports facilities the Parks Officer has provided no objection to the application. The Parks Officer has stated that, based on demand, that there is a no need for additional adult pitch, however as a way of managing the existing pitches at Burrow's field to the east, a pitch could be provided on the Lott's Meadow land once every 3 years at the Lott's Meadow to help maintain the existing pitches at Burrow's field.

8.2.3 The Illustrative Master Plan also provides for a local centre which would include a site for GP surgery, Dental Practice, Local Store and employment provision. This area is located to the front of the site on the west side. The allocation of these uses is sufficient to provide for the larger Strategic Allocation area, should or when other sites come forward. This would be controlled through the S106 agreements to ensure that the application is CIL compliant.

8.2.4 As the Council no longer adopts public open space and therefore a management strategy will be secured thorough a S106 agreement to ensure all public land within the application site is maintained to a satisfactory standard.

8.2.5 Policy SA1 of the pre submission JCS sets out that development should implement the Infrastructure Delivery Plan (IDP). The IDP which is a supporting document in the JCS was not advanced significantly via a Cheltenham CIL to inform this application, including prioritisation of infrastructure. However, in looking at the base information of the IDP compared to the provision levels provided in the application they are at a similar level, where there are differences the application is providing slightly higher provision than the IDP requirements and acts upon some of the issues of concerns raised by local residents in respect of infrastructure provision.

8.3 Conclusion

8.3.1 The application is considered to satisfy polices RC1, RC5, RC6 and RC7 of the Local Plan and the NPPF objectives, and therefore the illustrative masterplan for the application site demonstrates that sufficient provision of community facilities, open space, outdoor recreation and sports facilities can be provided within the site.

9.0 Education and Library Provision

9.1 Introduction

9.1.1 The NPPF states that the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Policy CP8 of the Local Plan seeks to ensure that development will only permitted where adequate provision is made for necessary infrastructure and facilities.

9.1.2 Policy INF 5 of the JCS requires Social and Community Infrastructure provision to be provided in new development. Essential social and community infrastructure includes schools, health services, community and spiritual centres, libraries, sports pitches, open space and children's crèche and play provision. Members should note that open space and recreation is covered in the previous section of this report. Also relevant is the potential requirements of the Infrastructure Delivery Plan as referred to in Policy SA1.

9.1.3 Gloucestershire County Council (GCC) is the relevant authority for education and libraries. GCC have commented on the application stating that while this application is for 650 dwellings it is important to consider the implications on education provision based on the wider JCS allocation area of 1,124 units, therefore their comments have regard to the higher number. GCC has reviewed and analysed pupil numbers at different development/dwelling types across the county and uses this research to forecast the likely number of places a development will generate.

9.1.4 Education provision is a key issue raised by both Members and the Local community. Concerns regarding provision have informed the S106 negotiations between the Council, GCC and the applicant.

9.2 GCC Requirements

9.2.1 **Pre School**: GCC calculations identify that 46 early year children are expected to arise from the proposal. Current demand is matched closely by supply in the area. A development of this size will increase demand significantly requiring additional provision. The increased demand resulting from the additional 2yr olds who will have a legal entitlement to free early education from 2014 should also be taken into account. The needs of pre school children generated by this proposal will be best met by provision incorporated within a new primary school. One early year's playroom and one play space for 2 year olds with associated office space, and toilets will be required. The provision of the identified provision would be secured and delivered through the S106 if the application is supported.

9.2.2 **Primary Education**: GCC calculations identify that 163 pupils are expected to arise from the proposal of 650 units, 1,124 units would generate 275 pupils. The primary schools closest to the development are Leckhampton and Warden Hill. Current forecasts indicate that Leckhampton is to remain over capacity to 2016/17 whilst Warden Hill is forecast to have only 21 surplus places in 2016/17. There is a need for this proposal to make primary education provision for the 163 children and for GCC to have regard for the additional 112 children from future development in the area. A one form entry school (1FE) provides 210 places and requires a site area of

1.1ha. a one and half form entry school provides 315 places and requires a site of 1.57ha.

9.2.3 A stand alone development of 650 dwelling would require the provision of a new primary school providing 1 form entry to accommodate the 163 pupils. A development to the size of the strategic allocation as set out in policy SA1 of the JCS for 1,124 dwellings would however require a school at one and a half form entry.

9.2.4 To ensure that an individual application is Community Infrastructure Levy (CIL) compliant it needs to provide planning obligations to make a development acceptable in planning terms and that directly relate the development proposed and relate to the scale and kind of development proposed. To this regard whilst the applicant is proposing the provision of a site area of up to 1.72 ha which is sufficient in size to provide a 1 and a half form entry school, however the applicant is only proposing to contribute to the provision of a one form entry up to 210 places. This would provide for the 163 pupils this development is likely to generate, and therefore CIL compliant. The balance of an additional 112 pupils which would be generated from the remaining land in the strategic allocation will need to be provided for. To resolve this, the developers who bring those sites forward would be required to provide the necessary contributions to GCC which would allow the new school to be erected or extended to provide a one and half form entry to provide the overall provision. The mechanism to achieve this would be through the S106 agreement between GCC and the Applicants and any future developers of the remaining land in the JCS strategic allocations.

9.2.5 The S106 agreement would also include an agreement on the timing of the delivery of the primary school with negotiations seeking to ensure it delivery in the early phases of development. It is anticipated that the primary school will be managed and maintained by the Diocese.

9.2.6 **Secondary Education**: The closest secondary school is Cheltenham Bournside and Sixth Form Centre (aprox 2.3km). The latest forecast indicates that from 2018/19 there will be no surplus places at Bournside. From 2019 there are forecast to be no surplus places within Cheltenham secondary school planning area. The other schools outside Cheltenham which could offer capacity is Chosen Hill.

9.2.7 GCC calculations identify that the proposed development would give rise to 97.5 secondary pupils and therefore a contribution of £1,738.620 will be required from the development to provide capital works to extend, remodel, upgrade and improve the capacity and suitability at Cheltenham Secondary Schools and/or Chosen Hill.

9.2.8 The S106 agreements will ensure this contribution is provided and paid in a timely manner.

9.2.9 As per the primary education GCC will seek contributions at the same level from the other parts of the strategic allocation at the time of considering applications. The strategic allocation would provide and overall total of 168 additional pupil places, therefore the contribution for the urban extension as a whole would raise to a total of £3,006,700. It should be noted that a

development at 1,124 is too small to trigger the requirement for a new secondary school.

9.2.10 **Libraries**: GCC has identified a need for contributions towards public libraries. Based on the scale of the development and the requirements necessary to serve the new population there is a requirement to provide an extension to the local service to meet the new demand and maintain the welfare of the new community. In order to meet this requirement, a contribution of £127,400 is required which will be used towards improving the local library at Up Hatherley and will include computers, stock, furniture, extended opening hours or capital works.

9.2.11 Consistent with education GCC will also seek this contribution from the other parts of the strategic allocation. The overall contribution will rise to a total of £220,304.

9.2.12 Policy SA1 of the pre submission JCS sets out that development should implement the Infrastructure Delivery Plan (IDP). The IDP which is a supporting document in the JCS was not advanced significantly through a CIL charging schedule for Cheltenham to inform this application. However in looking at the base information of the IDP compared to the education requirements to be provided by this application and the overall strategic allocation are similar, where there are some differences the application is again providing slightly higher provision than the IDP requirements.

9.3 Conclusion

9.3.1 With regards to CIL regulations, the contributions are considered necessary to make the development acceptable in planning terms as they would ensure that a sufficient choice of school places is available to meet the needs of existing and new communities. The contributions are directly related to the development and are fairly and reasonably relate to the scale and kind of development. The applicants have agreed to pay the requested contributions towards education and libraries which would be secured through a Section 106 agreement.

10.0 Archaeology and Cultural History

10.1 Introduction

10.1.1 The NPPF at paragraph 128 sets out that great weight should be given to the conservation of heritage assets. The more important the asset, the greater the weight should be. Significance can be harmed or lost thorough alteration or destruction of the heritage asset or development within its setting. Also that local planning authorities should require developers to submit an appropriate desk based assessment, where necessary field evaluation.

10.2 Consideration

10.2.1 The ES includes an assessment of the potential impact on Archaeological and Cultural History. A significant amount of the site (approximately 80%) has been subject to archaeological evaluation in the form of geophysical

survey followed by targeted trial trenching. The geophysical survey found several linear anomalies that could possible represent archaeological features. This was followed up with trial trenching though the site where built development is proposed and found evidence for activity during the prehistoric, roman, medieval and post medieval periods.

10.2.2 The effects on buried archaeological remains within the proposed site would result from loss of, or damage to, such remains during construction. The effect would be permanent and irreversible. Evidence suggests that buried archaeological remains are present with the site that could be affected by construction. The remains are not protected in themselves however could have the potential to contribute towards research and any unnecessary loss would have adverse impact. To avoid this impact a program of archaeological investigation ahead of any construction work would be required by a planning condition being attached.

10.2.3 The County Archaeologist has made comment on the application and has requested additional work to be done, which would include survey work to be undertaken on the remaining parts of the application site. There are two areas which have not been subject to the geophysical survey which are both located adjacent to the A46 Shurdington Road one area to the East of the site with the other to the West of the site. What is understood from the survey works that has been undertaken on the majority of the site there is evidence to suggest there is a protection for archaeological remains to be found though the entire application site. It is therefore considered reasonable that the recommended condition above will require the appropriate programme of mitigation to be undertaken to investigate and record any archaeological remains which would be adversely affected by any construction works for the entire site.

10.2.4 In considering built heritage, both the Councils Conservation Officer and English Heritage have provided no objection to the application. There are no listed buildings located on the application site, however there are a number of Listed Buildings nearby the site near which includes Grade II* Church of St Peter and Leckhampton Court, Grade II The Rectory; Church Farm House; Olde England and Moat Cottage. The master plan ensures there is suitable distance between the listed buildings and the built form of the proposal to the satisfaction of English Heritage.

10.3 Conclusion

10.3.1 Given the comments provided and subject to conditions being attached to ensure that a suitable program of archaeological investigation ahead of any construction work taking place, which is to be agreed by the County Archaeologist the proposal should not have a harmful impact.

11.0 <u>Ecology and Nature Conservation</u>

11.1 Introduction

11.1.1 The NPPF sets out that when determining planning applications local planning authorities should aim to conserve and enhance biodiversity by

encouraging opportunities to incorporate biodiversity in and around developments. Furthermore planning permission should be refused for development resulting in loss of deterioration of irreplaceable habitats. Local Plan Policy GE 7 of the local plan seeks to accommodate and protect natural features; NE1 NE2 and NE3 seeks to protect habitats of legally protected species, designated conservation sites and to resist development which would harm biodiversity and geodiversity of local importance. Policy SD10 of the pre submission document of the JCS also picks up the need to protect and enhance biodiversity and geodiversity.

11.2 Consideration

11.2.1 The ES contains an assessment of the potential ecological effects of the proposed development on the existing ecological features within the site at chapter 8. Within the EA is detailed consideration and contains Extended Phase 1 Habitat Survey, Hedgerow and Orchard Surveys, Bats, Badger Dormouse, Otter and Water Vole, Breading birds, reptiles, Great Crested Newts and Invertebrates Surveys. The ecological report confirms that the site and surrounding 1km area does not hold any form of statutory or non statutory nature conservation designation. However local records indicate the presence of a variety of species in and around the surrounding area.

11.2.2 The ES identifies that there are protected species on the site, albeit at a low level, and sets out detailed mitigation measure to ensure there protection. The key to ensuring biodiversity retention and enhancements will be in the production of a ecological management plan which incorporates all the areas identified and uses, planting of native species of emergent vegetation, shrubs, trees and wildflower mixes to ensure that the maximum biodiversity enhancements are gained. If all of the features identified cannot be established then there will be a loss to biodiversity in the long term. It is therefore recommended that an ecological management plan is produced before works take place on site to identify how all the inherent mitigation will be achieved as outlined in Chapter 8 of the ES, this can be secured though condition.

11.2.3 English Nature has not objected the application on Ecology and Biodiversity, however has provide comment on Protective Species, commenting that the main impact on European protected species will be foraging and commuting bats, nine species were identified using the site including rare bats such and Lesser Horseshoe. The hedgerows, streams and trees that provide foraging and commuting routes for bats should be retained with lighting being designed to minimise impact on bats. Chapter 8 sets out mitigation for bats, which can be included within the overall ecological management plan. Regarding other protected species English Nature has referred to their standard advice, the ecological management plan should achieve these standards which would be delivered though any reserved matters applications.

11.3 Conclusion

11.3.1 The application has been supported with extensive background and mitigation measures to respond to the existing Ecology and Biodiversity to demonstrate that the site could be brought and provide for the necessary

requirements to satisfy to objectives of the NPPF, Local Plan policies and the Pre Submission JCS subject to conditions being attached.

12.0 Air Quality

12.1 Introduction

12.1.1 The NPPF states that the planning system should enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

12.1.2 A number of comments have been received raising concerns regarding air pollution, stating that Cheltenham has been declared an Air Quality Management Area (AQMA) and that air quality already breaks EU limits in the Area. It is therefore suggested that the additional traffic generated from this proposal would further contribute to air pollution.

12.2 Consideration

12.2.1 Chapter 11 of the ES presents the results of the likely significant effects of the proposed development in terms of air quality. The additional housing that is part of the strategic allocation is included as part of the wider Masterplan. Further traffic modelling has been undertaken to reflect the changes and demonstrate the impact of the proposal in terms of air quality. The air quality assessment work has been updated using the revised traffic flows associated with the development proposal and the model verification includes the most recent monitored annual-mean nitrogen dioxide (NO2) concentrations for 2013.

12.2.2 The submitted Air Quality Assessment recognises that Cheltenham has been declared an AQMA. The assessment of air pollutions during the construction phase suggests that the impacts are likely to be in the high risk category with absence of mitigation or control; impacts during construction would include dust generation and plant vehicle emissions. However, with the implementation of recommended measures of mitigation, as set out in the ES which would include dust management plan, site management and monitoring to deal with site practices, this can be overcome.

12.2.3 With regards to air pollution from traffic associated with the proposed development, an assessment was undertaken using the Design Manual for Road and Bridges Localised Air Quality Assessment tool. This predicted the effect of the proposed development on air quality at a number of sensitive receptors. Additionally, as two new passive roadside monitors have been installed at Kidnapper's Lane and 97 Shurdington Road, the Councils Environment Protection Officer requested that data for these monitors are included in the model verification. Further modelling has been undertaken to reflect the 2013 data, included in the draft Progress Report 2014, and the two additional passive roadside monitors. The assessment predicted negligible effect at all of the receptors.

12.2.4 Members may be aware that as part on the evidence base of the Pre Submission JCS, Atkins were commissioned to assess the cumulative

impacts on air quality of the development proposals identified in the Draft JCS. This report presents a strategic level of assessment of air quality for the JCS, proportionate to the stage of development of the strategy using the current traffic model scenarios already available. The assessment of local air quality effects using illustrative air quality 'headroom' calculations indicated at the 12 locations selected for assessment (which includes Leckhampton) there would be no exceedance of annual mean NO2 UK AQS objectives and EU limit value thresholds in 2031 at human health receptors. There would also be compliance with EU limit value threshold for the protection of vegetation at designated ecological sites within 200 metres of the locations assessed.

Conclusion

12.2.5 The Councils Environment Protection Officer in considering Chapter 11 of the ES and the updated information has confirmed that the air quality impact of the proposed development will be minimal. Officers concur with the reports conclusions that the air quality effects associated with the operation of the proposed development are deemed to be of negligible significance (in terms of predicted air quality concentrations at existing receptors) and the operation of the proposed development does not conflict with any regional or local air quality policies.

13.0 Other Considerations

13.1 Neighbourhood Planning NPPF Concept Plan and Local Green Space Application

13.1.1 The Parish Council of Leckhampton with Warden Hill submitted to the Council in August 2013 their "Neighbourhood Planning NPPF Concept Plan and Local Green Space Application" for the purposes of "*making* a positive input into the JCS on the current strategic site allocation and to contribute to the process of updating the Cheltenham Borough Council and Tewkesbury Borough Council local plans to be NPPF-compliant" (pg. 7).

13.1.2 The document is not a Neighbourhood Plan in accordance with The Neighbourhood Planning (General) Regulations 2012 and The Parish Council of Leckhampton with Warden Hill has not sought designation as a 'neighbourhood area' which is a requirement in beginning the neighbourhood planning process. The document does not have status as a Parish Plan developed with the local authority, as such the document, in its present form cannot be considered as a supplementary planning document. The document therefore does not form part of the development plan for Cheltenham.

13.1.3 It is unclear whether the Concept Plan itself has been subject to widespread and effective community involvement. However, the document references public support for limiting development in the Leckhampton area and the formal response to this planning application (13/01605/OUT) from The Parish Council of Leckhampton with Warden Hill cites the document as a ground for objection.

13.1.4 The “Neighbourhood Planning NPPF Concept Plan and Local Green Space Application” seeks to make the case for the designation of a large part of the emerging Leckhampton strategic allocation as Local Green Space and sets out what the authors consider material reasons for avoiding large scale development in Leckhampton. The document was accepted as a representation to the Draft JCS consultation and was taken into account and evaluated during the production of the JCS’s current stage.

13.1.5 The Pre Submission JCS considered that whilst there was clearly strong need for strategic green infrastructure and effective and useful green and amenity space as part of the development, these requirements did not outweigh the value of a sustainable urban extension to this part of the town.

13.1.6 Cheltenham Borough Council met on the 9th of April 2014 and approved the Pre Submission JCS for publication and submission to the Secretary of State. This revision of the JCS included the application site as part of a larger strategic allocation at South Cheltenham.

13.1.7 At the Council meeting of the 9th of April 2014 the following recommendation of the Leader was also agreed: The Council resolved to: “Designate Local Green Spaces where appropriate as part of the Cheltenham Local Plan. We would particularly wish to evaluate the potential for Local Green Space designation in Leckhampton and North West Cheltenham, where green areas of particular local significance are known to exist. We further resolve that, with immediate effect, any planning application to be determined on strategic sites in Cheltenham will comply with the requirements of the JCS including policies SA1 and INF4 in regards to the identification of Local Green Space.”

13.1.8 As a result of this resolution work has begun on creating a consultation framework to begin engagement with local community groups and parish councils etc. to listen to their views on which areas of green space they deem special and could benefit from Local Greenspace protection. This protection would come as part of the Cheltenham Plan and will need to be balanced with the need to provide sufficient opportunities for development and assessed through the criteria set out in the JCS, NPPF and nPPG.

13.1.9 The timing of this application means that any outputs that would feed into the Cheltenham Plan on Local Green Space Designation cannot be taken into account in the Council’s determination of the scheme presented. However, the applicants have set out areas of the proposal which they consider meet the criteria for Strategic and Local Green Infrastructure as part of this application. It is the view of the Planning Policy team that these meet the broad requirements for Green Infrastructure set out in JCS policy INF4 and that the applicant has reasonably gone about discharging their duty under JCS policy SA1 to “seek in all cases to retain and enhance areas of local green space within the boundary of the allocation, which meet the criteria in NPPF Paragraph 77 whilst delivering the scale and distribution of development required by this policy”

13.1.10 However it is for the decision taker to be satisfied in his or her own mind that this is the case. The application must be considered on its own merits and according to the Development Plan and the weight given to emerging development plan documents such as the JCS.

13.2 Neighbourhood Planning NPPF Concept Plan and Local Green Space Application Traffic Considerations

13.2.1 Gloucestershire County Council as the local highway authority has in their comments provided technical commentary this document as follows in the next paragraphs.

13.2.2 The Parish has used mathematical formulae for traffic modelling, unfortunately I have no way of assessing how accurate, robust or credible the evidence base is, and whether the correct trip rates, distribution and growth patterns have been used, and what discount has been used for travel planning and trip banking.

13.2.3 Traffic models are primarily used to asses junction capacity in the morning peaks but this formulae appears to be measuring queue lengths, and does not appear to follow the DfT guidance on transport assessments.

13.2.4 In the conclusion at 6.11 it suggests that the LTP3 describes the A46 as the worst congested hot spot in the Cheltenham - Gloucester area, and refers to a plan, which shows the 30 most congested junctions in 2026. Unfortunately this plan has been totally misinterpreted, as the 2 junctions on the A46, refer to the side roads at Bentham and Whitelands Lane. These are very narrow width side roads and when assessed with their ratio of flow to capacity (RFC), the side roads will be over capacity by some margin, with queues of only 4 or 5. Not only is this a gross exaggeration of the facts, (albeit the plan is not particularity clear), minor queuing on to the A46 is not considered an issue in the determination of this application.

13.2.5 However I do agree with the statement regarding funding for infrastructure, and funding depends a lot on money from developers, however the NPPF only requires improvements to the transport network that cost effectively limit the significant impacts of the development.

13.2.6 The DfT approved SATURN modelling and isolated junction modelling has identified junctions currently without spare capacity, and this development will add to those junctions. Notwithstanding this the SATURN modelling does show that drivers will take alternative routes, modes, and choices and therefore with the package of capacity improvements, and travel planning, mitigation the view of the highway authority is that the development would not have a serve residual cumulative impact, in the context of the NPPF.

14.0 Conclusion and Recommendation

14.1 Conclusion

14.1.1 The strong views provided in objection to the application are understood and a summary of the objections is set out in section 1 of this report with the letters of objection being detailed at appendix 2. These views set out a number of material considerations and throughout this report, these have been fully considered.

14.1.2 The NPPF at paragraph 14 sets out a presumption in favour of sustainable development, unless material considerations indicate otherwise. The NPPF

identifies at paragraph 7, three dimensions to sustainable development which are economic, social and environmental. In considering the application the following is provided for:

- **Economic dimensions** – It is recognised that housing development is an important economic driver. The proposal also includes office provision and a local centre. The proposed development would contribute to local jobs, both directly and indirectly.

- **Social dimensions** – The proposal would deliver needed housing, including 40% affordable housing. The submitted DAS statement and illustrative masterplan demonstrates that the site could be designed to a good standard. The proposal would also have an acceptable impact upon the safety and satisfactory operation of the highway network. Furthermore, the site, through a S106 agreement, would deliver on site pre-school and a primary school with contributions to secondary education and public libraries. The site will provide for an on site doctors surgery and deliver the necessary outdoor and recreation play space.

- **Environmental dimensions** – The proposal would not be at an unacceptable risk of flooding and would not exasperate flooding problems for third party properties. Mitigation has been proposed to ensure that the development would not have a harmful impact on ecology or nature conservation. The development will be visible from vantage points looking into and out of the AONB, however the illustrative layout has been to designed to help to minimise the impact.

14.1.3 The application site is not located in the Green Belt or the AONB and therefore the NPPF does not exclude consideration to be given to the development of this land.

14.1.4 The NPPF requires the Council to demonstrate an ongoing 5 year incorporating a 5% buffer of deliverable site. This site forms part of the existing 5 year supply of housing, it is therefore necessary to ensure that the site is brought forward to ensure this delivery of the 5 year housing supply.

14.1.5 The site forms part of the allocated site A6 within Policy SA1 Strategic Allocation of the pre submission JCS. The larger strategic allocation has, through the advancement of the JCS evidence base, already been subject to detailed analysis to support its inclusion within Policy SA1.

14.1.6 Officers accept that it would be preferable for one application to be submitted for the pre submission JCS allocation. The Local Planning Authority however, has no control over the timing or format that a planning application is submitted. The submitted application has had regard to the wider strategic allocation. It has, in its assessment, included Highway matters of the larger strategic allocation and the provision of education facilities by allocating land for a primary along with land for local community facilities amongst other matters set out in the report. The application site will deliver its own infrastructure requirements and will allow this part of the allocation to be brought forward, without compromising the delivery of the larger strategic allocation of 1,124 dwellings.

14.1.7 Legislation requires that planning applications are determined in a timely manner, with each application being considered with regard to the development plan unless material considerations indicate otherwise.

14.2 Recommendation

14.2.1 The proposal requires a balance to be struck between the competing interests of the detailed objections to the application and having regard to the guidance provided in the NPPF, the emerging JCS and the relevant policies in the Local Plan. Officers conclude that the evidence provided demonstrate that this part of the JCS strategic allocation can be brought without compromising the wider allocation.

14.2.2 Officers considered that the proposal will provide for sustainable development as identified in the NPPF and that there are no overriding reasons to warrant the refusal of the application.

15.0 <u>Conditions / Informatives</u>

15.1 To follow.

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APPENDIX 1

13/01605/OUT

Land at Leckhampton

Consultee Comments

1. Leckhampton with Warden Hill Parish Council
2. Highways Agency
3. Contaminated Land Officer
4. HMO Division
5. County Education
6. Crime Prevention Design Adviser
7. Park and Landscapes Division
8. Severn Trent Water Ltd
9. Natural England
10. Gloucestershire Centre for Environmental Records
11. Campaign to Protect Rural England
12. English Heritage
13. Shurdington Parish Council
14. Gloucestershire Bat Group
15. Tewkesbury Borough Council
16. National Planning Casework Unit
17. Cheltenham Civic Society
18. Cotswold Conservation Board
19. County Archaeology
20. Environment Agency
21. Land Drainage Officer

APPLICATION NO: 13/01605/OUT	**OFFICER: Mr Craig Hemphill**
DATE REGISTERED: 17th September 2013	**DATE OF EXPIRY** : 7th January 2014
WARD: Leckhampton	**PARISH:** Leckhampton
APPLICANT:	Bovis Homes Limited & Miller Homes Limited
LOCATION:	Land At Leckhampton Shurdington Road Cheltenham
PROPOSAL:	Residential development of up to 650 dwellings; mixed use local centre of up to 1.94ha comprising a local convenience retail unit Class A1 Use (400sqm), additional retail unit Class A1 Use for a potential pharmacy (100sqm), Class D1 Use GP surgery (1,200sqm,) and up to 4,500sqm of additional floorspace to comprise one or more of the following uses, namely Class A Uses, Class B1 offices, Class C2 care home, and Class D1 Uses including a potential dentist practice, childrens nursery and/or cottage hospital; a primary school of up to 1.72ha; strategic open space including allotments; access roads, cycleways, footpaths, open space/landscaping and associated works; details of the principal means of access; with all other matters to be reserved.

Parish Council
4th March 2014

The Council objects very strongly to the application on the following grounds:

1. **Conflict with Cheltenham Local Plan**. The application is contrary to the existing, valid Cheltenham Local Plan (2nd review 2006) and it runs counter to the intention of the Local Plan in its specific policy on the land at Leckhampton in which Cheltenham Borough Council supported the conclusion of the Inspector that the intrinsic value of the land should be protected as a resource for its recreational, landscape, wildlife and archaeological interest. These issues have been well explained in the objections dated 9 January lodged by Martin Horwood, MP for Cheltenham.

2. **Pre-emption of JCS.** The application attempts to pre-empt the current process of consultation and refinement of the emerging Joint Core Strategy. The inclusion in the draft JCS of strategic developments on the land at Leckhampton is highly controversial. It was based on incorrect projections for population and employment growth and apparent ignorance of the very serious implications for traffic congestion and pollution, as explained in the Council's submission to the JCS Consultation attached at Appendix 2. The applicants seek to use the current shortfall in the housing land supply to justify early determination. But, as is well argued in the submission by Lufton and Associates, Chartered Planning Consultants, dated 28 October 2013, there is no immediate pressure on Cheltenham Borough Council to permit this application just to address the current short-term housing supply requirements; a positive determination at this time when the JCS is being refined would be contrary to the first core planning principle at paragraph 17 of the NPPF.

3. **Conflict with Neighbourhood Plan and Local Green Space Application.** The application is contrary to the emerging Neighbourhood Plan as described in the Neighbourhood Planning Concept that was submitted to Cheltenham and Tewkesbury Borough Councils in August 2013 by Leckhampton with Warden Hill Parish Council and Shurdington Parish Council respectively and which is attached at Appendix 1. The Concept includes a Local

4. **Harm to the setting of the AONB.** The proposed development would seriously harm the setting of the AONB including the iconic view from Leckhampton Hill and the Cotswold Way National Trail as well as the view of Leckhampton Hill from the A46. This is explained in detail by Natural England and the Cotswold Conservation Board in their objections to the

application. Natural England states: 'There are viewpoints of the highest sensitivity along the Escarpment of the Cotswold AONB, such as the Devil's Chimney. The view from the Devil's Chimney gives panoramic views across the Vale which would be interrupted by the proposed development. The scale of the potential development would significantly change the view from an open, rural expansive view to a predominantly urban view of the edge of Cheltenham'. Paragraphs 115 of the NPPF states that: 'Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty'.

5. **Strong public opposition.** There is extremely strong public opposition to the development. In the exit poll which the Parish Council conducted at the exhibition held by the developers, 94% of people were opposed or strongly opposed the development. In addition, all elected representatives of the area at District and County level are also strongly opposed and so is Martin Horwood, Cheltenham's MP, and Alex Chalk, the prospective Conservative parliamentary candidate for Cheltenham.

6. **Insufficient provision of schooling.** The application includes a new primary school, but this would not be built until a later stage in the development. In the meantime there would be no primary provision for the first 300 or so homes. Warden Hill Primary School and Leckhampton Primary School are both full and there is a shortfall in primary school places in Cheltenham because of the second generation post-war bulge. For secondary schooling, Balcarras and Bournside are always over-subscribed. They are both academies and cannot be forced to expand. Balcarras has insufficient land to expand anyway.

7. **Flood risk.** Warden Hill has been flooded on many occasions, most recently in 2007 when parts of Warden Hill were flooded to a depth of over 1 metre and houses were badly contaminated with swept-out sewage. Flood defences were improved in 2010 to protect against flooding from the south-west tributary of Hatherley Brook, but there remains the risk of flooding from the main tributary, which flows through the site of the proposed development. The main tributary frequently floods gardens in St Michaels Road, and some of the 2007 flooding of Warden Hill came from the direction of the main tributary. The Council is concerned that the proposed development would remove the option of building a flood alleviation scheme on the Leckhampton fields should this be needed to protect south Cheltenham in future from the effects of climate change. The Council is also concerned that the balancing ponds proposed by the applicants in the Flood Risk Assessment and Drainage Strategy (FRADS) may not give adequate protection from heavy rain falling on already saturated ground, as in 2007. As stated on page 26 of the FRADS, the balancing ponds will be cut well below the water table and there is uncertainty over the effects of underground water flow and hydrostatic pressure, especially if climate change produces frequent periods like this winter and last where the water table comes up to the surface for many weeks. Gardens in Woodlands Road across the A46 from the site of the proposed balancing ponds are flooded frequently by underground water flowing under the A46; one house was flooded inside in 2007 and again recently according to local residents. This demonstrates there are significant underground flows in the vicinity of the proposed ponds. The Council is concerned that the applicants may also be underestimating the groundwater flooding on the fields.

8. **Traffic congestion.** As discussed below in Annex A, the traffic problems that would be created by the proposed development are very serious and the applicants have been unable to find any solution to them. The Transport Assessment contains many weaknesses and omissions, as identified in the objections submitted on 22 October 2013 by Robert Williams of Entran Traffic Consultants, who has advised the Council. The traffic system in south Cheltenham is fragile and the extra traffic from the 650 new households would make it unstable during the morning peak traffic period. The 650 homes would directly add about 195 vehicles to the A46 queue, extending the queue down to Shurdington. But disruption to traffic flow through Church Road would add several hundred more vehicles. The traffic

queue could then extend to the A417 roundabout and affect traffic on the A417. If one also includes the extra traffic from the 300 homes at the SD2 site, which is included in the Tewkesbury Local Plan, the queue seems certain to threaten the A417. The Council has made many traffic surveys and studied and modelled the traffic problems in considerable detail, as have the applicants, and no way has been found to mitigate the problems.

9. **Damage to the local economy.** The traffic congestion that would be caused if the development was allowed to proceed would make it much harder to travel into Cheltenham on the A46. This would do serious damage to local economy. The great importance of transport to the local economy and the damage that traffic delays cause to local companies and employment are being emphasised by Gloucester County Council in the case for the A417 Loop road to reduce delays on the A417. The green setting of Cheltenham is also hugely important for attracting new companies into the town. These economic issues are covered in more detail in the Council's submission on the draft JCS at Appendix 2.

10. **Traffic pollution.** Measurements by Cheltenham Borough Council show that nitrogen dioxide (NO2) pollution levels exceed the EU-permitted limit of 40 micrograms per cubic metre near the A46 junction with Moorend Park Road. Although data has not been gathered over a full year, CBC has stated that the pollution at this location is likely to exceed the limit throughout the year. The NO2 pollution in Church Road also exceeds the EU limits in the winter months. The argument is sometimes made that the traffic pollution in Cheltenham is not as bad as in parts of London and in some other UK towns and cities. However, three important issues need to be considered in the context of the present application:

    a. Medical and epidemiological evidence is showing that the current limits on vehicle pollution may need to be reduced substantially (ref.1). WHO is recommending that the level for pm2.5 nanoparticles must be reduced by a factor of 2.5. This would mean that pm2.5 near the Moorend Park Road junction, Church Road and along the A46 will be over the pm2.5 limit. Compared to NO2, pm2.5 is more pervasive and persistent, and in urban areas background levels are not much lower than roadside levels (ref.2); pm2.5 from a long A46 queue can be swept up into Cheltenham by the prevailing SW wind.

    b. The European Commission in 2012 rejected the UK government's plea for further time to introduce anti-pollution measures and in 2013 the UK Supreme Court ruled that the UK government is failing its legal duty on air pollution. Following this ruling, the Commission launched legal proceedings against the UK in February 2014 (ref. 3). Many UK towns and cities now face the risk of multimillion euro fines (ref. 4). The Localism Bill includes clauses that would allow the UK government to pass EU fines on to regional and local authorities and the proportion passed would be relative to the degree to which each authority has power to tackle the problem and has failed to do so. It is one thing to have a pollution problem and to be taking steps to reduce it, but quite another to approve developments that would make bad pollution levels worse. Cheltenham Borough Council could face substantial fines and EU prosecution.

    c. As well as the pollution danger to residents, there is also a health risk to drivers and passengers inside vehicles (ref. 5). Tests have shown that the majority of pollutants inside a car originate from the vehicle immediately in front. The type of situation in the A46 queue with vehicles nose to tail at an average gap of 3 to 4 metres between vehicles is particularly bad. Some vehicles, notably buses, also ingest their own emissions, and studies have shown that the worst pollution levels can be inside buses in the queue. Cyclists and motor cyclists would also experience high pollution levels (refs. 6-8).

Conclusion: For the reasons set out in sections 1 to 10 and in Annex A below and Appendices 1 and 2, the Parish Council believes that Cheltenham Borough Council has no choice other than to reject the application. The Parish Council also believes that the same reasons will force the JCS to be revised to remove the land at Leckhampton from the list of potential strategic development sites.

References

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4. "UK Cities Face Ban on Heavily Polluting Traffic", Guardian, 28 June 2012. www.theguardian.com/environment/2012/jun/28/uk-cities-ban-polluting-traffic#history-link-box
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Appendices:

1. Neighbourhood Plan Concept submitted in August 2013 by Leckhampton with Warden Hill and Shurdington Parish Councils to Cheltenham and Tewkesbury Borough Councils.
2. Joint Core Strategy Consultation: Comments by Leckhampton with Warden Hill Parish Council dated 12 December 2013.

Annex A:
Why the traffic problems preclude any major housing development on the Leckhampton fields.

1. Introduction

The evidence in this annex is largely contained in the Neighbourhood Plan Concept, which was submitted jointly by Leckhampton with Warden Hill Parish Council and Shurdington Parish Council to Cheltenham and Tewkesbury Borough Councils in August 2013 and is included at Appendix 1. Annexes 2 and 3 of the NP Concept analysed the traffic implications for the various strategic developments under consideration in the draft Joint Core Strategy (JCS) as this was emerging in summer 2013. The purpose in Annex A is to analyse the traffic problems specifically for the context of the current application for 650 new homes on the Leckhampton fields.

2. Traffic surveys and model

The crucial traffic problems arise in the workday peak morning period from 07:30 to 09:15. To properly understand the traffic system, the Parish Council has conducted a large number of surveys of the peak morning traffic between 07:00 and 09:30 at all the main junctions along

the A46 from the A417 to the Moorend Park Road junction and at various locations in Leckhampton. The surveys along the A46 were carried out mainly in February and March 2013 and are described in Annex 3 of the NP Concept at Appendix 1. Six surveys were also carried out at the junction of Church Road and Kidnappers Lane in September/October 2012 and other surveys have been conducted in Farm Lane at the Church Road and Brizen Lane junctions in March/April 2013. The data from the A46 surveys was used to build a computer model of the inward traffic flow on the A46, which was validated by Robert Williams, Director of Entran traffic consultants. The model is described in Annex 3 of the NP Concept.

3. What causes the traffic queue?

The reason the A46 queue forms is that the junction of the A46 with Moorend Park Road has a maximum throughput capacity of about 900 vehicles per hour in each direction on the A46. This capacity also depends on how much traffic is crossing or joining the A46 from Moorend Park Road. From about 08:15 to 08:45, the capacity drops to around 750 vehicles per hour as more of the traffic light cycle is taken up by the Moorend Park Road traffic. The queue starts to form at around 07:40 when the vehicle arrival rate on the A46 exceeds the maximum junction capacity. It grows quickly, reaching the Woodlands Road junction in 5 to 10 minutes. The growth then slackens and the queue grows slowly to a final length of 0.8 to 1.3 km. The queue typically persists to around 09:00, although if the traffic is light the queue can be much shorter and dissipate quite quickly.

4. How the 650 new homes would affect the A46 traffic queue

The traffic from the 650 new homes would affect the A46 queue in two ways. First, vehicles from the new homes travelling into Cheltenham through the Moorend Park Road junction would add directly to the A46 queue. Secondly, the longer A46 queue would cause traffic to start diverting from Shurdington via Leckhampton Lane and Church Road in order to bypass the queue. This would destabilise the traffic flow through Church Road. What happens if Church Road jams is discussed in sections 5 to 12 below.

To calculate how many vehicles would be added directly to the queue by the 650 homes, the Council has used a mobilisation figure of 0.6 vehicles per household during the peak period. This is the mobilisation figure used by the applicants in their traffic modelling. It is consistent with the morning traffic flow that the Council measured in traffic surveys at the Lanes Estate, which is adjacent to the site of the proposed development and also to the SD2 and Brizen Farm sites. Using 0.6 vehicles per household and making a best estimate of the proportion that would travel into Cheltenham on the A46 (as discussed in Annex 3 of the NP Concept at Appendix 1) the 650 homes would directly add about 195 extra vehicles to the A46 queue.

As the queue lengthens beyond each junction, traffic wanting to leave at that junction becomes trapped in the queue, adding further to the queue length. This is taken into account in the traffic model. The model shows that the traffic from the 650 homes would extend the queue to a length of 2.6 km taking it to the Leckhampton Lane junction in Shurdington.

Whilst application 13/01605/OUT is only for 650 homes it is linked through the applicants' illustrative masterplan to the proposed development of 300 houses on the SD2 site, which is already included in the Tewkesbury Local Plan. The SD2 application was previously rejected at a planning appeal because it was deemed to be too isolated and unsustainable without the development now proposed in the present application. If the present application were permitted, approval for the SD2 application would seem likely. Adding the traffic from the 300 SD2 homes would increase the length of the A46 queue by a further 1.1 km, taking the queue through Shurdington to the Badgeworth Lane junction. There would be around 450 vehicles in the queue, of which around 320 were due to the developments. The model calculates that from the end of the queue it would take vehicles nearly an hour to reach the centre of Cheltenham.

5. How traffic would be likely to bypass the A46 queue

The A46 traffic model allows the queue speed to be calculated at each point along the A46 and it predicts that from the Leckhampton Lane junction in Shurdington vehicles in the queue would take about 35 minutes to reach the Moorend Park Road junction. However, drivers can bypass the queue by turning right onto Leckhampton Lane and continuing through Church Road and into Cheltenham either via Leckhampton Road or via Moorend Park Road. This bypass route is slightly longer in distance but would take less than 10 minutes provided that traffic was flowing freely through Church Road.

There would in fact be two bypass routes that drivers could take: one via Leckhampton Lane through Church Road to Leckhampton Road and the second via Leckhampton Lane and Farm Lane and then back to the A46 through the proposed development to the new traffic light controlled junction at the north end of the site, which would be close to the front of the A46 queue. The first route would be quicker, but once a long traffic queue built up in Church Road drivers would be tend to divert instead onto the second route.

Drivers would judge which route to take based on their experience of past congestion. Until about 07:45, most drivers would remain on the A46 knowing that the traffic queue would still be quite short when they reached it. After 07:45, drivers would increasingly decide to divert onto Leckhampton Lane and might choose which route to take at the junction with Farm Lane by observing the length of the traffic queue ahead of them into Church Road. If Church Road jammed up, they would all tend to use the Farm Lane route.

The traffic model shows that if all the vehicles heading to the Moorend Park Road junction diverted onto Leckhampton Lane this would add an extra 8.2 vehicles per minute on average to the 4.1 vehicles per minute that currently turn onto Leckhampton Lane. Such a three-fold increase in the traffic would be likely to jam Church Road as discussed in section 10 below.

6. Importance of Church Road to the Cheltenham traffic system

It is important to appreciate the vital role that Church Road plays in Cheltenham's traffic system and the consequences if Church Road jams up. The route through Church Road allows traffic to flow between south/south-east Cheltenham and west Cheltenham/A46/A417/M5/Gloucester without having to go through the town centre or through the Moorend Park Road junction.

The traffic flow in Church Road was surveyed by the Parish Council at the Kidnappers Lane junction on six mornings between 10 September 2012 and 1 October 2012. The surveys covered all five weekdays and a second Thursday survey was done because on the first Thursday the traffic jammed up (the cause of this is not known). The data from these surveys are in Table A.2.1 of the NP Concept at Appendix 1.

The surveys showed that each workday around 1320 vehicles used Church Road between 07:30 and 09:00, with 675 vehicles travelling in the SW direction (clockwise round Cheltenham) and 650 in the NE direction (anti-clockwise). Without Church Road, the majority of these vehicles would have to travel instead via the Moorend Park Road junction. The clockwise flow through Moorend Park Road would mainly turn left onto the A46; some might continue straight ahead if drivers were heading to west Cheltenham, the M5 or Gloucester. Either way, the vehicles would take up more of the traffic light cycle and would reduce the throughput for the A46 traffic, roughly on a 1:1 basis. The anti-clockwise flow would travel up the A46, adding to the A46 queue. Most vehicles would turn right onto Moorend Park Road. They would have to wait to cross the outbound A46 traffic flow and because there is only a short right turning lane they would hold up the rest of the traffic. This would mean the inward and outward A46 traffic could not cross simultaneously and would need separate traffic light periods. Overall, this could reduce the capacity of the junction to as little as 200 vehicles per hour and add of the order of 800 extra vehicles to the queue length. Such a small throughput would also mean that a long queue of outward travelling vehicles would form back through the centre of Cheltenham.

7. Reason that traffic in Church Road is liable to gridlock

The section of Church Road between Kidnappers Lane and the Leckhampton Road is narrow. Most of the houses on the north side of the road have no space for off-road parking and vehicles are parked along the north side of the road. They park on the pavement as much a possible, but even so it is hard for vehicles to pass in both directions. If a jam happens it is normally resolved quickly by drivers squeezing past each other. More protracted jams do occur occasionally and would be more frequent if the traffic levels were to increase. Mark Power of Gloucestershire Highways has emphasised the importance of keeping any extra traffic away from Church Road and this has been a key issue for the applicants. As Mark Power has also made clear, there is no way to mitigate the traffic difficulties in Church Road, because the road is hemmed in by housing and by the scarp of Leckhampton Hill and the AONB.

8. Current situation

Fortunately, very few drivers currently use Church Road to bypass the A46 queue. This has been confirmed by surveys made by the applicants using number plate tracking and also by the Parish Council by measuring the driving times by the two routes. The Parish Council found that as long as the A46 queue does not extend beyond the Kidnappers Lane junction, the bypass route offers no advantage. However, if the A46 queue reaches as far as the Up Hatherley Way roundabout, the bypass route becomes about 6 minutes quicker. At present, drivers in Shurdington deciding whether or not to use the bypass route do not know how long the A46 queue will be when they reach it. So they tend to choose to stay on the A46. However, the A46 queue does not need to become much longer before drivers can decide with confidence that it would be quicker to use the bypass route.

9. Effect of general increases predicted in traffic levels

Even without any further housing development, the A46 traffic queue is expected to increase by around 75 vehicles because of the general increase in traffic predicted by Department for Transport as the economy recovers. This would increase the queue length by about 0.6 km and make the bypass route clearly quicker for drivers reaching the Leckhampton Lane junction in Shurdington after about 08:15. It was on this argument that it was concluded in the NP Concept that there is no scope for any housing development on the Leckhampton fields that would significantly increase the traffic flow into the Moorend Park Road junction.

10. How close is Church Road to gridlock?

The traffic flows measured in the Council's traffic surveys in Church Road are shown in Table A.2.1 of the NP Concept at Appendix 1. Some indication of the maximum capacity of Church Road can be gleaned by looking at when a significant traffic queue forms waiting to enter the narrow section of the road. It appears that when the combined throughput in both directions is less than 16 vehicles per minute, the traffic generally flows well and any queue is short. When the combined throughput exceeds 16 vehicles per minute there is roughly a 50% chance that a substantial queue will form. The maximum throughput capacity seems to be around 19 to 20 vehicles per minute, though it is not clear that this could be sustained for long.

The survey data for 13 September 2012 also indicates how the flow can collapse due to congestion. Because cars and vans can squeeze past each other, the road is only likely to jam absolutely if a large vehicle is trying to get through in the peak period. The road has a 7.5 ton limit, but occasionally an articulated lorry or other very large vehicle does attempt to come through and it then depends on the traffic coming in the other direction stopping soon enough or reversing back. With a larger pressure of vehicles trying to get through, it would be more likely that reversing back would not be possible and the road could then lock up completely.

A more common scenario is for the throughput to progressively decline as the road becomes more congested and vehicles have increasing difficulty passing each other. Long queues then build back along Church Road towards Leckhampton Lane, along Kidnappers Lane and across and along Leckhampton Road. This was the situation for the traffic survey on 13 September 2012. In fact, even on a normal morning when the traffic is flowing well through

Church Road, a short queue does frequently spread back to the Leckhampton Road. So it is easy for problems in Church Road to spread back and block Leckhampton Road.

11. Direct traffic to Church Road from 650 homes

As discussed below in section 13, the applicants have proposed measures by which they believe they can limit the number of vehicles flowing to Church Road from the 650 new homes to an average of around 0.75 vehicles per minute in the peak period. It would also be important, however, that a big group of vehicles did not arrive at the same time. Also, as discussed in section 13, the measures are controversial and are unlikely to work well or to be acceptable in terms of road safety.

12. Effect of traffic diverting onto the bypass route and the impact on the A417

As noted in section 5, there would be two routes by which traffic could bypass the A46 queue: one via Leckhampton Lane through Church Road to Leckhampton Road and the other via Leckhampton Lane, Farm Lane and through the proposed development to the traffic light controlled exit near the head of the A46 queue. Vehicles using the Farm Lane route would all contribute to the A46 queue because they would still be passing through the Moorend Park Road junction. Vehicles using the Church Road route would also contribute if they then continued via Moorend Park Road but not if they continued via Leckhampton Road to the Bath Road. The Council's traffic surveys at the Moorend Park Road junction indicate that the traffic through Church Road would split roughly half-half between these two routes. So provided that the Church Road traffic did not jam up, the bypass route could significantly reduce the length of the A46 traffic queue, probably by around 60 vehicles (0.5 km).

On days when Church Road jams up, the situation would be similar to that already described in section 6 with the traffic diverting via the A46 and the Moorend Park Road junction. The clockwise traffic flow would add to the length of the A46 queue on a 1:1 basis by reducing the junction capacity for the A46 traffic. The anticlockwise traffic would flow back to the A46 via Farm Lane and the development. The overall outcome would depend on how badly Church Road jammed and at what stage this happened. A partial gridlock similar to that on 13 September 2012 and starting at about 08:10 would be likely to add somewhere around 270 vehicles to the A46 queue and around 130 vehicles to queues in Church Road, Moorend Park Road and at the exits onto the A46 from the development. This assumes that the traffic light sequences at the A46 intersections are set to avoid huge queues building up on Moorend Park Road and within the development. The traffic model indicates that the 270 vehicles added to the A46 queue would probably cause the A46 queue to extend as far as the A417 junction by about 08:55, although this depends on how quickly traffic flows adjust. This is without including the traffic from the 300 homes on the SD2 site or the general increased traffic levels predicted by the Department for Transport. Both of these would make the queue substantially worse as well as increasing the probability of Church Road jamming.

One might be able to mitigate the impact on the A417 by adding an extra queuing lane along the eastbound carriageway, but this would be expensive and would not necessarily prevent the queue reaching back onto M5 junction 11A. One could also widen the A46 south of Shurdington to allow a two lane queue on the A46, but again this would be expensive.

13. Proposed mitigation measures – reducing the traffic to and from Kidnappers Lane

To limit the number of vehicles coming to Church Road from the new development, the applicants have proposed closing Kidnappers Lane, creating an alternative route through the new development and making this deliberately torturous with multiple bends to discourage traffic flow. The hope is to discourage the through traffic that currently flows along Kidnappers Lane between Church Road and Up Hatherley Way. The flow is important because it links east and south-east Cheltenham to west Cheltenham and to the A40 and M5 junction 11. The combined flow on this route between 07:30 and 09:00 is of the order of 200 vehicles. The aim would be to reroute these 200 vehicles via the Moorend Park Road junction in order to reduce the traffic through Church Road so that Church Road is less likely to jam.

There are several problems with this proposal:

- The route via the Moorend Park Road junction is longer in distance and there are delays in both directions in queuing at the Moorend Park Road junction, particularly for traffic going anticlockwise round Cheltenham. So to discourage the through traffic, one would need to inject a long delay into the Kidnappers Lane route. This is not practicable and one could not delay the through traffic without also delaying vehicles from the development and existing housing along Kidnappers Lane, Farm Lane and the Lanes Estate. Re-routing via the Moorend Park Road junction would add to the A46 queue.

- Making the route through the development tortuous would create a serious hazard to children, pedestrians and road users.

- As Mark Power of Gloucestershire Highways pointed out at the public meeting on the application, it is difficult to get approval to close roads and it is not at all clear that approval would be granted to close Kidnappers Lane.

14. Proposed mitigation measures – reducing traffic to and from Leckhampton Lane

The applicants have sought ways to reduce the traffic in Church Road flowing via Leckhampton Lane. They outlined three possible approaches in their public exhibition in February 2013, but none of these works and the application and Transport Assessment leaves the issue vague. The three approaches considered were:

1 (a) To close Leckhampton Lane. This is impossible because of the vital importance of the Church Road – Leckhampton Lane route to Cheltenham's traffic system, as discussed in section 6 above.

(b) To alternatively close Leckhampton Lane just to traffic travelling in the NE direction. This would add around 400 vehicles to the A46 queue and would extend the queue beyond the A417 junction and onto the A417.

2 To route the traffic travelling NE on Leckhampton Lane back to the A46 by closing the access to Church Road. This would mean routing around 400 extra vehicles through the Moorend Park Road junction, with the same consequences as (1b) above. It would also be routing this traffic through the proposed development with attendant safety risks.

3 To impede the traffic travelling NE on Leckhampton Lane in order to remove the time advantage of this route compared with staying in the A46. The applicants have suggested using a string of chicanes along Leckhampton Lane. However, it is not practicable to inject a delay of at least 15 minutes needed to compensate for the increased delay in the A46 queue. If the chicanes were made sufficiently dangerous to be a deterrent, they would be likely to cause traffic accidents, including head on collisions. Also because the chicanes would be permanent they would create a 24-hour traffic hazard.

15. Proposed mitigation measures – more use of public transport

The applicants propose that significant mitigation might be achieved through more use of public transport. However it seems doubtful that buses will make a substantial contribution to reducing the traffic even if they are routed through the proposed development. Whilst, buses are an attractive option for travelling to the centre of Cheltenham for shopping later in the day, most commuters in the peak period are heading elsewhere and choose the flexibility and convenience of driving. Residents driving into Cheltenham from the proposed 650 homes will be able to join the A46 very near the front of the A46 queue. So they will not suffer significant delay and will have little incentive to use a bus. In several traffic surveys that the Parish Council carried out at the Kidnappers Lane / A46 junction, no residents from the Lanes Estate were observed to board the number 10 bus, even though this is a regular service with a bus every 10 minutes at that time of day. It is hard to see why it would be much different for residents in the proposed development.

16. Proposed mitigation – use of park-and-ride

The drivers who might have an incentive to use buses are those who are stuck at the back of the A46 queue. But this only applies if travel by a park-and-ride bus offers a big time advantage. Because there is no space on the A46 for a dedicated bus lane, the bus would be stuck in the

same queue as the cars. Widening the A46 to provide a bus lane would be very expensive and it would be necessary to bypass Shurdington. So this option is unlikely to be affordable and in any case experience with park-and-ride schemes elsewhere in Cheltenham shows that they do not succeed easily. It has also been suggested that a park-and-ride could be located near the Up Hatherley Way roundabout. However, by the time drivers reach this point, their remaining journey time is quite short. So, it would require some other incentive, such as making parking in Cheltenham or at their place of work seriously expensive. The problem is that such measures would deter people from working or travelling into Cheltenham and would hurt the economy.

17. Proposed mitigation – use of alternative routes into Cheltenham

The applicants have suggested that vehicles could travel by other routes to avoid the A46 queue. It is hard to see what these could be. To the west, the route via the M5 and A40 is very congested and Badgeworth Lane is a poor alternative to the A46 because vehicles would still have to travel into Cheltenham from Hatherley on already congested roads. To the east the only alternative route would be via the A417 to the Air Balloon roundabout and then into Cheltenham via Leckhampton Hill. This route is substantially longer in distance and the congestion up Crickley Hill and at the Air Balloon roundabout is notorious. The route down Leckhampton Hill has a 7.5 ton restriction and a quite dangerous curve below Salterley Grange. The proposed A417 Loop road would reduce the congestion on the A417 but make the route still longer, and even with the Loop, the traffic climbing up Crickley Hill would still be quite slow. It is also against the Highways Agency policy for the strategic highway network to be used for local travel and the case with the Highways Agency and Government for the A417 Loop road could be weakened if Cheltenham were allowing developments that would increase the local traffic on the Loop road.

18. Fundamental unsustainability

The analysis in this Annex has only concerned how the proposed 650 homes would increase the formation and length of the traffic queues. There is another issue over how long the congestion would persist. The existing queue on the A46 forms from 07:40 to 07:55, but typically persists for another hour until there is sufficient spare capacity in the system to allow it to dissipate. If the A46 traffic queue extends to the A417 or even to Shurdington, it will take much longer to dissipate. The A46 is the trunk route to the A417. There is little point in pleading the economic importance of the A417 Loop if the congestion on the A417 up Crickley Hill is merely replaced by congestion on the A46 and spreading from the A46 onto the A417. The traffic system in south Cheltenham is fragile because there is so little road capacity for vehicles to travel in and out of Cheltenham from the south. This cannot be altered. It is a fundamental limitation due to geography and Cheltenham's layout. The system is close to breaking. It is vital to keep it functioning by not overloading it more.

19. Conclusion

The Parish Council has been a member of the applicants' local forum and has given a great deal of detailed consideration to the traffic issues. The Council has explored various potential solutions to the traffic problems. But no ideas have been found to be feasible. The Parish Council is therefore absolutely convinced that these traffic problems are so severe and intractable that they not only prohibit the present application but also preclude any development that would significantly increase the net traffic flow into Cheltenham through the Moorend Park Road intersection in the peak traffic period.

Highways Agency
31st October 2013

Thank you for consulting the Highways Agency (HA) with regards to this application. We acknowledge this as a mixed use outline planning application seeking permission for 650 C3 Class dwelling houses; 400sqm retail unit Class A 1 Use; additional retail unit Class A1 Use for a potential pharmacy (100sqm): Class D1 Use GP surgery (1,200sqm,) and up to 4,500sqm of additional floorspace to comprise one or more of the following uses, namely Class A Uses, Class B1 offices, Class C2 care home, and Class D1 Uses.

Having considered the information prepared to support the proposed scheme, in particular the accompanying Transport Assessment (TA), and the Non-Residential and Residential framework Travel Plans, we acknowledge that transport analysis allows for a previously envisaged quantum of development The TA therefore confirms that a strategic road network specific Addendum will be produced to reflect the impact of the proposed development mix (as identified above) in line with the requirements of the Department for Transport's recently adopted Circular 02/13 "The Strategic Road Network and the Delivery of Sustainable Development"'. For your information the HA is content that the applicant is working closely with us in developing agreeable assessment for inclusion in the Addendum report.

The Travel Plans appear to have the potential to mitigate the impact of increased car journeys on the strategic road network. However, the HA will need to understand the implications for the SRN, to be demonstrated in the Addendum, before the exact requirements of the Travel Plan can be known.

Whilst the HA awaits SRN specific assessment to be provided by way of an Addendum document we find it necessary to direct that planning permission not be granted for a period of time sufficient to allow for the provision and review of this information. I therefore attach a TR110 confirming our position.

If you have any questions regarding the points raised in this letter please do not hesitate to contact me.

21st May 2014

Further to our letter of 30th October 2013, and our subsequent renewal of the Direction of Non Approval, we have set out as follows an update to the Agency's position regarding the Leckhampton development.

Since our previous letter further work has been undertaken by the applicant's consultants, including assessment of development traffic and the associated impact upon the strategic road network (SRN). This has included a PARAMICS assessment undertaken by our consultants JMP.

The results of this assessment have identified that the scheme proposed, when considered against forecast development growth identified within the emerging Joint Core Strategy, is unlikely to have a significant impact upon the safe and free flow operation of the SRN. Given this to be the case the Agency is lifting the direction of non approval previously placed on the application and replacing it with one offering no objections. The enclosed TR11 0 confirms this.

In lifting this direction it should be noted that this development has been considered within the context of the JCS as it stands. Currently this provides very limited detail, provisional or committed, as to the likely level of highway infrastructure that will be required to deliver growth across the JCS region. This results in a lack of clarity as to how traffic growth will be accommodated by the highway network in the region and the consequential impact of this

growth upon the SRN network. Given this to be the case we would welcome clarification from the JCS authorities as to the proposed infrastructure and associated mitigation strategies that are to be implemented.

The Highways Agency is working closely with the Joint Core Strategy project team and other stakeholders to ensure that the submission, in due course, of the Joint Core Strategy for examination will be supported by a robust transport evidence base.

Contaminated Land Officer
4th October 2013

Standard Contaminated Land Planning Condition

Unless otherwise agreed by the Local Planning Authority, development shall not commence on site until the following condition has been complied with. If unexpected contamination is found after development has begun, development must be halted on that part of the site affected by the unexpected contamination until section iv) has been complied with in relation to that contamination.

i) Site characterisation
A site investigation and risk assessment shall be carried out to assess the potential nature and extent of any contamination on the site, whether or not it originates on the site. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority. The report must include;

a) a survey of the extent, scale and nature of contamination

b) an assessment of the potential risks to;
- human health
- property (including buildings, crops, livestock, pets, woodland and service lines and pipes)
- adjoining land
- ecological systems
- groundwaters and surface water
- archeological sites and ancient monuments

c) an appraisal of remedial options to mitigate against any potentially significant risks identified from the risk assessment.

This must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR11'
ii) Submission of a remediation scheme
Where remediation is required, a detailed remediation scheme to bring the site to a condition suitable for the intended use shall be produced and will be subject to the approval of the Local Planning Authority prior to implementation. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2a of the Environmental Protection Act (1990) in relation to the intended use of the land after remediation.

iii) Implementation of approved remediation scheme
Any approved remediation scheme must be carried out in accordance with its terms prior to the commencement of the development, other than that required to carry out remediation. Following completion of measures identified in any approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be produced and is subject to the approval of the Local Planning Authority.

iv) Reporting of unexpected contamination
In the event that contamination is found at any time when carrying out the approved development, that was not previously identified, it must be reported immediately in writing to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with section i) and a remediation scheme submitted in accordance with section ii). Following completion of measures identified in the approved remediation scheme, a verification report must be produced in accordance with section iii).

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

29th May 2014

I have previously commented on this application and there remains the requirement to add the standard contaminated land condition to any planning permission. Information submitted to date does not satisfy the requirements of the recommended planning condition.

HMO Division
25th September 2013

Bedrooms should have floor areas no less than 7sqm for a single bedroom and 10.5sqm for a double bedroom.

The applicant should be advised that any residential accommodation must comply with the Housing Act 2004 and that any inadequate, insufficient or hazardous accommodation may be subject to enforcement action under the Housing Act 2004, which can include prohibition of use.

Subject to compliance with the above, I have no fundamental objection to this proposal.

County Education
22nd July 2014

The proposal will comprise 650 residential dwellings. I have based my assessment on the assumption that all of these are qualifying dwellings for the purposes of assessing the S106 contributions required by GCC. The level of contributions may change if the dwelling numbers/mix changes.

GCC is the relevant authority for education, highways and various other community services. It is responsible for determining and negotiating contributions towards these services which include education, library, fire and rescue, transportation strategy, sustainable transport issues, pedestrian and cycle routes etc. **The Development Control Unit of the Environment Department will provide a separate response on highway/transportation issues.**

This development will generate significant additional burden on resources in the area and the developer will be required to provide a number of GCC and District contributions to address the impact on infrastructure. I am also aware that the Draft of the Joint Core Strategy for Tewkesbury, Cheltenham and Gloucester currently identifies the area within which the application is located for the development of in the region of 1,100 dwellings. In formulating my response I consider it appropriate to have regard to the potential additional development likely to come forward in this area in the near future i.e. 1,100 or more dwellings.

I have considered the implications of the proposed scheme on local education and other community resources for which GCC is responsible and whether planning obligations are

relevant. This follows requirements and standards that are used by GCC elsewhere in Gloucestershire and also meets national practice.

1. GENERAL

a. In all cases GCC work to complete a S106 agreement with the applicant and landowners as soon as possible in relation to GCC requirements. This may be done independently of the timing of planning applications.

b. Any contributions sought will align with the National Planning Policy Framework March 2012 (paragraphs 203-206) and the CIL Regulations 2010 (section 122 and 123). Planning obligations will be required only where they are:-

- necessary to make the development acceptable in planning terms; and
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

c. Contributions are ring-fenced for capital works specified by GCC, held in independent accounts and are not interchangeable.

d. GCC will account for unspent contributions, expenditure and accrued interest.

e. Unless programmed for expenditure or otherwise agreed, contributions not applied by GCC are returnable to the developer usually within 5 years, together with interest.

f. GCC must be party to the s106 agreement. The agreement may include other matters such as highway obligations and the District Council may also be party to it. The developer will be required to meet GCC's legal and technical costs in preparing the agreement.

g. All contributions will be bonded and indexed.

h. We will assist by promoting early agreement of appropriate terms and instructing solicitors to commence preparation of a s106 agreement with the developer and the landowner as soon as possible in relation to the GCC contributions.

2. EDUCATION

a. GCC is a Children's Services Authority (CSA). The key aim of the CSA is to improve the co-ordination of services that affect children and young people. These services are:

i. Education – taking over functions of the former Local Education Authority (LEA)

ii. Social services – where they relate to children and young people

iii. Health services – where the CSA works for children on behalf of organisations such as the NHS.

b. New residential development gives rise to new pupils in relation to the type and numbers of new dwellings. There are direct linkages between the number of dwellings and number of pupils. GCC has a statutory responsibility to ensure sufficient high quality pupil places across the County. Where existing schools do not have surplus places or there are insufficient schools or no schools local to the development additional accommodation is required for the new pupils. There is justification at national, regional, county and local level for requiring contributions to local early years, primary and secondary education facilities where evidence indicates this is reasonable.

c. Contributions will be bonded, and indexed to the DfE cost multiplier issued by the Department for Education (or by any other Department Ministry or other body upon which the duties in connection with that index devolves, being the cost per pupil for the construction of accommodation to provide additional pupil places) and supplemented by the BCIS Public Sector Tender Price index in the intervening year or years that the DfE cost multiplier is not issued.

d. When assessing education contributions, GCC's current criteria for a qualifying dwelling are a house without age or health occupancy restrictions and with 2 or more bedrooms. Flats and one bed houses are therefore excluded as they are occupied by lower numbers of school aged children compared to houses.

e. **This education assessment is based on 650 family houses i.e. 650 qualifying dwellings but with regard to the potential for 1,100 or more dwellings in the area.**

f. Affordable or social housing is considered to contribute to local education infrastructure requirements in the same proportion as open market housing.

g. GCC has reviewed and analysed pupil numbers at different development/dwelling types across the county. The current research shows that 7 full time equivalents pre-school children, 25 primary age children and 15 secondary pupils arise per 100 dwellings.

h. **Pre-School:**

    i. In accordance with 2g above, 46 early years children (full time equivalents) will arise from this proposal. GCC's Childcare Sufficiency Assessment 2011 identifies that currently demand is matched closely by supply in the area. A development of this size will increase demand significantly requiring additional provision. The increase in demand resulting from the additional 2yr olds who will have a legal entitlement to free early education from 2014 should also be taken into account. The needs of the pre-school children generated by this proposal will be best met by provision incorporated within a new primary school. One early years playroom and one play space for 2 year olds with associated office space, toilets and play areas will be required as part of a new school.

i. **Primary requirements:**

    i. In accordance with 2g above, 163 primary pupils will arise from this proposal. 1,100 dwellings would generate 275 children. The primary schools closest to the development are Leckhampton and Warden Hill. Current forecasts indicate that Leckhampton is forecast to remain over capacity to 2016/17 whilst Warden Hill is forecast to have only 21 surplus places in 2016/17. Clearly, there is a need for this proposal to make primary education provision for the 163 children it is likely to generate and for GCC to have regard for the additional 112 children from further development in the area.

    ii. Leckhampton and Warden Hill schools are on restricted sites and do not have capacity to expand.

    iii. A one form entry (1FE) school provides 210 places and requires a site of 1.1ha. A 1.5FE school provides 315 places and requires a site of 1.57ha. A standalone development of 650 dwellings would be required to provide a 1 form entry (FE), 210 place school site. To enable expansion of a new school to 1.5FE, this proposal will be required to provide a 1.57ha freehold primary school site to the Diocese at nil cost with access and all necessary services of appropriate capacity to the site boundary. The site to be free from any encumbrances and contamination. It is understood that the Diocese has been in discussion with the

applicant regarding the provision of a site of 1.7ha through its landownership on the site (see v below).

iv. GCC requires a school of sufficient capacity to be constructed as part of this development to accommodate all pupils arising from the proposal but with capacity for expansion to 1.5FE. Therefore a 1FE (210 place) school with a1.5FE core and early years accommodation should be provided by this development.

v. The Diocese of Gloucester owns land within the application site. It is understood agreement has been reached between the Diocese and the applicant to locate the school site on the Diocese land and for the school to be built under an arrangement between the applicant and the Diocese. The Diocese are proposing for the school to operate under their control as a free school as part of the Diocese of Gloucester Academies Trust. GCC is satisfied with this arrangement subject to provisions in a S106 agreement requiring the school to be built to the appropriate standards and accommodation schedule that is compliant with BB99 or any superseding standards. GCC will also require some form of 'step-in' rights in the S106 in the event of the school not being provided within prescribed timetable and/or standards. This may require the provision of a bond.

vi. Given the forecast lack of places in the area, the timing of the provision of the new school is critical to GCC and the Diocese. As the Diocese are proposing to manage the school build contract, an early date needs to be agreed for the applicant to make the school site available to the Diocese with appropriate access and services connections. These arrangements will need to be the subject of further discussions between the parties.

j. **Secondary requirements**

i. The closest secondary school is Cheltenham Bournside (approx 2.3km). The latest forecast indicates that from 2018/19 there will be no surplus places at Bournside.

From 2019 there are forecast to be no surplus places within the Cheltenham secondary school planning area.

GCC's School Capacity Return for 2012 also indicates that by 2018 there will be an additional 200 children (11 to 16) from small scale housing developments in Cheltenham, who are not accounted for in the forecasts above.

ii. In accordance with 2g above, 650 qualifying dwellings will give rise to 97.5 secondary pupils.

iii. The education cost multiplier per secondary pupil for 2014/15 is £17,832 (11 to 18). This is a fair and representative indication of the capital cost of providing secondary places.

iv. Given the current and forecast pressure on school places in Cheltenham there is a need for this proposal to provide additional capacity in the area. A contribution of: **97.5 x £17,832 = £1,738,620** will be required from this proposal for capital works to extend, remodel, upgrade and improve the capacity and suitability at Cheltenham Secondary Schools and/or Chosen Hill. At this stage discussions have not taken place with the relevant schools to determine where and how this additional capacity will be provided.

v. If the number of qualifying dwellings change, the contribution will be adjusted up or down by £2,675 per dwelling.

vi. This contribution to be provided in 2 equal instalments 12 and 24 months after commencement of development.

3. COMMUNITY SERVICES

a. **Libraries**

i. Delivery of a properly resourced and adequate library service to meet the needs of the population arising from the scheme is required.

ii. Based on the scale of the scheme and the numbers of new inhabitants, there is a requirement to provide an extension to the local service to meet the new demand and maintain the welfare of the new community.

iii. The local is the council library at Up Hatherley.

iv. Contributions for community libraries are assessed on the same basis as for statutory libraries, i.e. on the impact of the increased population in relation to stock, equipment and opening hours requirements and the immediate and long term costs arising over a 10 year period.

v. Operating costs are primarily staffing and premises costs. Guidance for standards of library provision advise a) 216 items to be purchased annually per 1,000 population and b) publicly available personal computers (0.6 PCs per 1,000 population). The cost of provision includes annual running/maintenance costs.

vi. To deliver a library service to the new community to appropriate standards, contributions will be required, based on comparable costs of £196 per dwelling (this includes all flats and houses).

vii. **For 650 dwellings this is a total contribution of £127,400**. This will be used towards any of the following to improve the local library at Up Hatherley:- new computers, stock, furniture, opening hours or capital works. If dwelling numbers change this figure will be adjusted up or down by £196 per dwelling.

viii. As a comparison, the 'Community Infrastructure Levy: advice note for Culture Arts and Planning Professionals' (Arts Council for England, April 2012) sets out recommended CIL charges based on the expected space and building cost implications of population growth for arts and culture provision. The recommended standard charge for libraries is £252 per dwelling.

ix. The contribution will be payable in 3 equal instalments 12, 24 and 36 months after commencement of development.

b. **Youth Services**

i. It is recommended that the play areas or playing fields also include a multi-use games area and/or skate park to provide outdoor facilities for teenagers. This provision is normally secured by the borough council(s).

4. SUMMARY

a. This response requires planning contributions from this proposal towards early years, primary and secondary education and libraries.

b. This assessment may change if the residential mix is altered. The response is valid for 6 months from the date of this letter. After this time we may review the assessment.

c. These comments are made without prejudice to any other functions for which GCC, the Highways Agency or the District Council have responsibility e.g. highways and transportation, or any stance GCC may take at inquiry, appeal, re-application etc and are made at officer level. GCC members' opinions may differ from my comments. These views do not imply any comment about the merits or otherwise of any development at this site.

Crime Prevention Design Advisor
31st October 2013

In my capacity as Crime Prevention Design Advisor for Gloucestershire Constabulary I would like to express concerns over the future design of this the planning application at Shurdington Road, Leckhampton, Cheltenham with reference number 13/01605/OUT. I would like to draw your attention to the PDF document attached to the carrying e-mail which should be read in conjunction with the following crime generating subjects.

Crime and Disorder Act
Gloucestershire Constabulary would like to remind the planning committee of their obligations under the Crime and Disorder Act 1998, Section 17 and their "Duty to consider crime and disorder implications
(1) Without prejudice to any other obligation imposed on it, it shall be **the duty of each authority** to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can **to prevent, crime and disorder in its area**."

Design and Access Statement
This application's Design and Access Statement has briefly mentioned cycle security and the ODPM's Safer Places, but the statement fails to address crime prevention, designing out crime and site security. Future planning applications for this development should include further information about the creation of a safe environ across the whole development, while providing secure businesses and homes. "**Design and access statements for outline and detailed applications should therefore demonstrate how crime prevention measures have been considered in the design of the proposal and how the design reflects the attributes of safe, sustainable places set out in Safer Places- the Planning System and Crime Prevention**." (Paragraph 132, Guidance on information requirements and validation, Communities and Local Government 2010)

Planning Policy
Cheltenham Borough Council's Local Plan which contains Policy CP 4:
"**Development will be permitted only where it would:**
(c) make adequate provision for security and the prevention of crime and disorder; and
(b) not, by nature of its size, location, layout or design to give rise to crime or the significant fear of crime or endanger public safety."

"Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion." Paragraph 58, National Planning Policy Framework, DCLG 2012

Carbon Footprint of Crime
The carbon cost of crime is based on a formula created by Prof Ken Pease for converting the financial costs of crime into the energy expenditure of the emergency services and criminal justice service as they respond to criminal events. In Gloucestershire this roughly equates to 257,012 tonnes of CO_2 generated in 2012, with the Cheltenham responsible for 27% a total of

65,680 tonnes of CO2. Over the past 12 months 274 crimes occurred in the Leckhampton area, generating 618 tonnes of CO2.

Secured by Design
Secured by Design focuses on crime prevention of homes and commercial premises and can reduce crime by 60%. This can be achieved through the use of security standards for a wide range of applications and products; by removing the various elements that are exploited by potential offenders and ensure the long term management and maintenance of communal areas.

School
- The boundary and access treatment should encourage natural surveillance from the street scene and neighbouring houses.
- School access should be managed and locked, controlling access at the start and end to the school day
- Signage should be used at the entrance and around the car park to impart ownership of these areas
- Trespass onto the school grounds by the local community for their personal use should be discouraged at all times
- Access into the staff car park should be controlled; management practices should ensure the gates are closed during school hours and locked at all other times to minimise visitor footfall passing through the staff parking looking for a short cut.
- Visitor car parking should be sign posted at the entrance to instil Academy ownership, lit to BS5489-1:2003 and subject the natural surveillance
- Cycle storage should offer secure fixing and racks, while ensuring the area is subject to natural surveillance from classrooms and dusk till dawn lighting to remove the fear of crime.
- The reception desk should form an active part of the building's security plan by controlling access into the building, ensuring visitors sign in and by monitoring movement through the internal corridors.
- Designed and built following the Secured by Design publication "Schools - 2010" and the Zurich Insurance groups publication "School and Academy design - A guide to the design and protection of School and Academy buildings"

Local Centre
The layout
- The planting and boundary treatment should be designed to prevent the formation of desire lines and maintained to provide natural surveillance around the buildings, car park and through the landscaped areas
- Street parking should be avoided as this breaks down any natural surveillance and hinders the flow of traffic.
- The local centre should ensure natural surveillance is provided from each building and through the surrounding area, while incorporating CCTV and a monitored alarm ystem into the security
- Appropriate lighting levels should be incorporated across any parking area to reduce he fear of crime and restrict light pollution
- The combination of footpath, parking space and landscaping will need careful onsideration to prevent accidental or intentional damage to parked vehicles.
- Outside of opening hours these community facilities will be vulnerable to crime and ASB
- Vehicle mitigation should be built into the car park boundary to prevent illegal access with clear closing time for the car park to discourage late night use

- Cycle racks should be provided and installed to offer the greatest level of security.
- Any medical or care facility should provide a secure environment for the residents and staff. The visitor access into the building should be controlled and monitored to increase the residents' security and well being

Buildings

- Any incubation business should benefit from crime prevention in the buildings and landscaping which has been designed to ensure their long term survival
- Each unit should be enclosed with a boundary treatment and secure gates to encourage security and create a defensible space. This will provide extra security for the employees and their possessions; the business, raw materials and final production output; and reduce the permeability through the development.
- Appropriate signage should be used to establish ownership and provide information to visitors.

Housing

- The windows and doors used during construction should meet the security standards BS PAS 24:2012 for doors and windows
- Housing should be grouped together to create perimeter blocking, creating rear garden security and restricted access
- Increased levels of permeability will allow offenders easy, concealed access to each property and convenient escape routes.
- An area of garden should be defined and to clearly separate and instil ownership, thereby creating a defensible space around the house and parked vehicles.
- Garden boundaries should be clearly defined with a 1.5m fence; this will create a defensible space, provide natural surveillance and offer views of the various vistas
- Each property should have sufficient fenestration to encourage natural surveillance across the street scene from high occupancy rooms
- The boundary abutting the POS should be reinforced with a line of defensive planting to restrict garden thefts and burglary

Public Open Space

- The design and layout of the play equipment should cater for a variety of age groups; construction and materials should prevent vandalism; seating should be provided to encourage parents/ guardians to stay longer; rules and responsible owners should be clearly displayed; area should remain unlit to discourage night time use as any play area presents a sinister purpose after sunset.
- The layout of the footpaths and the soft landscaping on either side should encourage natural surveillance in order to reduce the 'fear of crime'
- Footpath will need frequent maintenance to maintain the surface; ideally the planting should be cut back to ensure clear lines of sight. These areas will be frequented by dog walkers; therefore dog waste bins should be provided and emptied regularly.
- Any street furniture used should encourage legitimate use, but discourage street games or late night ASB.
- Street parking and public car parking spaces in adjoining public open spaces will attract dog walkers and family groups, increasing congestion in these areas

- Public areas, courtyards and play spaces should encourage natural surveillance and ownership; offering additional seating to encourage children and families to visit, offer security for cycles and include design features that restrict vandalism
- The landscaping should be managed and maintained to demonstrate ownership, ensure its long term future and prevent future incidents of ASB.
- The boundary treatment, footpaths exceeding 1.5m wide and road edging should include vehicle mitigations to prevent inappropriate access, fly tipping and the abandonment of vehicles.
- The water course will need regular maintenance to prevent localised flooding
- Each swale should be sign posted to warn of water hazards or boggy conditions
- The park space, playing fields and other public open space should be subject to a long term maintenance and management programme to retain passive surveillance and limit the opportunities for stalking or ambush.
- Allotment tool sheds need to be robustly constructed and secured to prevent the theft of equipment. Access should be controlled to reduce the garden's vulnerability to crime, reduce the threat of ASB and damage to the allotment produce

Developer Obligations
Please be aware that these representations are prepared by Gloucestershire Constabulary Crime Prevention Design Advisor to address Crime Prevention through Environmental Design (CPTED) and the 7 Attributes of Safer Places. A separate representation may be submitted by the Constabulary Estate's Department to seek developer obligations towards Police infrastructure through Section 106 and the Community Infrastructure Levy.

Conclusion
Gloucestershire Constabulary's Crime Prevention Design Advisors are more than happy to work with the Council and assist the developers with further advice to create a safe and secure development, and when required assist with the Secured By Design accreditation. Please feel free to contact me should you have any queries or wish to discuss these issues further.

4th June 2014

Following my previous comments submitted on 30 October 2013, I would like to add a few points relating to the new information added to the planning application at Shurdington Road, Leckhampton, Cheltenham with reference number 13/01605/OUT.

Any street furniture located in the community centre, public open spaces or through the street scenes should be selected or constructed to limit potential damage as a result of skateboarding activities.
When public spaces abut private gardens, any soft landscaping should be selected to offer additional security for existing residents.
Any public building should be designed to offer security and reduce criminal damage along blank elevations or loading bays which open onto accessible areas, ideally the rear of these buildings should be enclosed to create a defensible space.
The master plan shows existing roads that have been closed to create new cul-de-sacs, the intended purpose of these roads should be considered as they will simply offer additional ad-hoc parking behind the shop, while providing legitimate access to buildings and garden.

Parks & Landscapes Division
23rd September 2013

We are supportive of allotment provision, our initial thoughts are that the percentage of green space currently shown as allotments could be increased, and the most obvious way of

achieving this is to combine the area currently shown as "community orchard" into a larger allotment site.

In advocating this I would offer the following rationale:

We have plenty of evidence in our current Allotment Strategy to demonstrate that there is demand for allotments in the South of Cheltenham, but there is currently a shortage of land available for this purpose. In other words provision of allotments will help the council to meet this objective, and be welcomed at large, as well as meeting the needs of the new development.

The maintenance demands of green space when designated as allotments is considerably less per square meter than formal and informal green space. If set up and run correctly they generate income and run themselves.

It is mostly the case that fewer larger sites are easier to manage than more, but smaller ones, i.e. the arrangement of having a site warden and volunteer committee ends up replicating itself on each site irrespective of size.

Allotments offer lots of social benefits, i.e. exercise, healthy food, making friends etc.

Well managed allotments contribute to local biodiversity, although there is plenty of opportunity afforded for this elsewhere on the site, and surrounding countryside.

The demand and suitability of a community orchard is less evident, and in any event could be developed at a later date if demand materialises.

Severn Trent Water Ltd
14th October 2013

With reference to the above planning application the company's observations regarding sewerage are as follows.
I confirm that Severn Trent Water Limited has NO OBJECTION to the proposal subject to the inclusion of the following condition.

Condition
The development hereby permitted shall not commence until drainage plans for the disposal of surface water and foul sewage have been submitted to and approved by the Local Planning Authority. The scheme shall be implemented in accordance with the approved details before the development is first brought into use.
Reason
To ensure that the development is provided with a satisfactory means of drainage as well as to reduce the risk of creating or exacerbating a flooding problem and to minimise the risk of pollution.

Natural England
30th October 2013

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

This reply comprises our statutory consultation response under provisions of Article 20 of the Town and Country Planning (Development Management Procedure) (England) Order 2010 Regulation 61 (3) of the *Conservation of Habitats and Species Regulations 2010* (The Conservation Regulations) and Section 28(I) of *the Wildlife and Countryside Act 1981* (as amended).

The proposal is for 650 houses, retail space and public open space on 33.44ha of land at Shurdington Road, Leckhampton. This site is currently used for agriculture and small holdings and includes remnant orchard, wooded stream corridors, fields, trees, ditches and rights of way. The site is 200m from the boundary of the Cotswolds Area of Outstanding Natural Beauty (AONB) and visible from important public viewpoints within the AONB. It is 2km from the Cotswold Way National Trail and within 2km of Leckhampton Hill and Charlton Kings Common Site of Special Scientific Interest (SSSI).

The site is close to two parcels of land owned by Gloucestershire County Council and a parcel of land owned by MA Holdings which are also being considered as part of the draft Joint Core Strategy for the area. The MA Holdings land is adjacent to the AONB boundary. A proposal for 175 houses and mixed use development has already been submitted for Brizen Farm which is just to the west of the site. The whole area could be an urban extension to south Cheltenham with well over 1000 houses.

More Information needed for Natural England to be able to respond fully

Natural England is not able to comment fully as insufficient information has been provided on landscape and ecological impacts of all the development proposals for this area. Natural England is particularly concerned about the scale of the combined developments and the impact this will have on the setting and the Special Qualities of the AONB. The impact of all the proposals need to be considered as a whole and not as individual developments.

Joint Core Strategy
The Joint Core Strategy (JCS) for Cheltenham, Tewkesbury and Gloucester is out for consultation and is due to be adopted in 2014. Until the JCS is adopted and detailed proposals are presented for the adjacent and nearby sites (if allocated in the final JCS) it is not possible to properly assess the impacts on the AONB. Overall impacts on ecology will also need to be informed by development plans for the whole area and there is the potential for mitigation strategies proposed for one development to be undermined by subsequent and separately considered development.

Protected Landscape
This proposal is for a large development in close proximity to the boundary of the Cotswolds AONB. The site is a very sensitive location because it lies below and in open view from the Cotswold Escarpment. Views to and from the escarpment are a recognised Special Quality of the AONB. The development therefore has the potential to impact negatively on views towards the Escarpment and from the Escarpment, particularly from important public viewpoints, such as the Devil's Chimney, on the Cotswold Way National Trail within the AONB.

The Landscape and Visual Impact Assessment (LVIA) includes an illustrative masterplan and viewpoints for this site, the two Gloucestershire County Council sites and the MA Holdings site but does not include Brizen Farm. Natural England advises that detailed masterplans and viewpoints for all the sites are considered together. We also recommend that photomontages for all the sites are produced so that the cumulative impact on the AONB can be assessed.

The LVIA states that while the development will be visible from a number of viewpoints on the Cotswold Escarpment, these are not significant. It is not clear if this statement relates to the one proposal for 650 houses or for all the proposals considered in the LVIA. Natural England's view is that the scale of overall development could have a significant impact on the setting of the AONB, the Escarpment (a Special Quality of the AONB) and the National Trail.

The effects on the setting of the Cotswold AONB
The effect on the landscape character of this part of the Severn Vale is important because it forms part of the setting of the Cotswold AONB. The setting of an AONB is often significant to

the conservation of its special qualities and this is certainly the case here. The proposed development site is 200m from the AONB boundary. Whilst the Vale is extensive, the area including the application site is part of the setting of the AONB and contributes positively to the AONB's special qualities. The lower-lying rural landscape of the Vale below the escarpment is particularly sensitive to large scale built development.

The effects on the special qualities of the Cotswold AONB
The Cotswolds AONB is designated as a nationally important landscape to ensure that its special qualities are conserved and enhanced. The special qualities that could be significantly affected by this development are:

- The Cotswold Escarpment;
- The High Wolds – an elevated landscape with large open landscapes, commons, 'big' skies and long distance views.

Views well beyond the AONB itself are therefore an integral part of the character and special qualities of the AONB. They are extremely important to many visitors' enjoyment of this nationally designated landscape. The special qualities of the AONB are also widely enjoyed by people when outside the designated area. Iconic views of the Cotswold Escarpment and High Wolds, from the Severn Vale, are of a nationally important English landscape feature which is protected by and managed through its AONB status. The potential impact of the proposed developments on views from, and therefore on the enjoyment of, the AONB; and views of the AONB could be long-term, significant and adverse.

There are viewpoints of the highest sensitivity along the Escarpment of the Cotswolds AONB, such as the Devil's Chimney. The view from the Devil's Chimney gives panoramic views across the Vale which would be interrupted by the proposed development. The scale of the potential development would significantly change the view from an open, rural expansive view to a predominantly urban view of the edge of Cheltenham.

The effects on the Cotswold Way National Trail
The Cotswold Way National Trail runs along the top of the Cotswold Escarpment to the south-east of the site. The enjoyment of views from the National Trail could be adversely affected to a significant degree as described above in relation to views from locations such as the Devil's Chimney.

We would also strongly encourage the Council to seek the views of the Cotswold Conservation Board regarding this development.

Green Infrastructure
Given the location of this large development in relation to the AONB, Natural England would recommend that substantial and well designed green infrastructure (GI) is provided to reduce the visual impact of the proposed development on the protected landscape. The proposal for 650 houses on 33.44ha includes approximately 14ha of GI. GI for the other sites is illustrative. Natural England advises that a GI masterplan for the whole site (including Brizen Farm) should be produced to maximise the effectiveness of GI in mitigating landscape impacts (screening and helping the development to blend into its wider landscape setting), and delivering ecological mitigation and enhancements.

Green infrastructure can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation and biodiversity enhancement,. Evidence and advice on green infrastructure, including the economic benefits of GI can be found on the Natural England Green Infrastructure web pages.

Protected Species
Surveys have been carried out for bats, badgers, dormice, water voles, otters, birds, reptiles, amphibians and invertebrates. The main impact on European protected species will be

foraging and commuting bats: nine species were identified using the site including rare bats such as Lesser Horseshoe. The hedgerows, streams and trees that provide foraging and commuting routes for bats should be retained. The layout of the development and the lighting should be designed to minimise impacts on bats, particularly the way the hedgerows are used as wildlife corridors.

We have not assessed the survey for domestic species: badgers, barn owls and breeding birds1, water voles, white-clawed crayfish or widespread reptiles. These are all species protected by domestic legislation and you should use our protected species standing advice to assess the adequacy of any surveys, the impacts that may results and the appropriateness of any mitigation measures.

The advice we are giving at the present time relates only to whether, in view of the consultation materials presently before us (including with reference to any proposed mitigation measures), the proposal is likely to be detrimental to the maintenance of the species concerned at a favourable conservation status in their natural range (*i.e.* the '*Favourable Conservation Status'* test). We have not considered whether the proposal satisfies the three licensing tests or whether a licence would be issued for this proposal. This advice is based on the information currently available to us and is subject to any material changes in circumstances, including changes to the proposals or further information on the protected species.

If the LPA is aware of, or representations from other parties highlight the possible presence of a protected or Biodiversity Action Plan (BAP) species on the site, the authority should request survey information from the applicant before determining the application. The Government has provided advice on BAP and protected species and their consideration in the planning system.

Natural England Standing Advice is available on our website to help local planning authorities better understand the impact of development on protected or BAP species should they be identified as an issue for particular developments. This also sets out, when, following receipt of survey information, the authority should undertake further consultation with Natural England.

Biodiversity enhancements
The development should aim to enhance the biodiversity of the site through the retention and enhancement of the trees, hedges and water courses on the site. These features should be part of a connected mosaic landscape that links to linear landscape features outside the site to provide important commuting routes for wildlife.
The application provides opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats and the installation of bird nest boxes for house martins, house sparrows and swifts and habitat enhancement. The authority should consider securing measures to enhance the biodiversity of the site. This is in accordance with Paragraph 118 of the NPPF. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that '*Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity*'. Section 40(3) of the same Act also states that '*conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat*'.

Soils and Land Quality
From the documents accompanying the consultation we consider this application falls outside the scope of the Development Management Procedure Order (as amended) consultation arrangements, as the proposed development would not appear to lead to the loss of over 20 ha 'best and most versatile' agricultural land (paragraph 112 of the National Planning Policy Framework).

For this reason we do not propose to make any detailed comments in relation to agricultural land quality and soils, although more general guidance is available in Defra *Construction Code*

of Practice for the Sustainable Use of Soils on Construction Sites, and we recommend that this is followed. If, however, you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

For any queries relating to the specific advice in this letter only please contact Sally King on 07900 608 100. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

16th July 2014

Thank you for your consultation on the above dated 09 May 2014 which was received by Natural England on the same date.

We note that your consultation is addressed to a Natural England office which was closed several years ago. Your nearest Natural England office is in Worcester. However, all post should be sent to our consultation hub by email to consultations@naturalengland.org.uk or, if necessary, by post to the address in Crewe provided above. We would be grateful if you could update your records.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.
The National Parks and Access to the Countryside Act 1949
The Countryside and Rights of Way Act 2000
The further information provided does not address the concerns we set out in our previous responses to this application. We raised significant concerns relating to impacts on the setting of the Cotswolds Area of Outstanding Natural Beauty (AONB), particularly on views to and from the escarpment.

As the further information we requested has not been provided, Natural England objects to this proposal due to insufficient information regarding impacts on the setting of the AONB, views to and from the AONB, and proposed mitigation. The information needed relates to the impacts of this proposal alone and cumulatively with nearby housing proposals.

We recommend that the Local Planning Authority (LPA) requests further information on the impacts to the setting of the AONB, particularly on views to and from the escarpment, including the cumulative impacts with proposed neighbouring development sites including Brizen Farm. We recommend that the LPA also requests further information on the proposed mitigation for the identified visual impacts. Ideally, mitigation would be provided in a strategic manner across the cluster of future development sites in this locality.

The adopted Local Plan recognises the value of the scarp edge to the AONB and that its urban fringe location makes it sensitive to development pressure (paragraphs 7.18 and 7.20). The Local Plan recognises that development on sites outside but close to the AONB can have an impact on its character, and requires such development to be "designed and landscaped to avoid harming the natural beauty of the AONB" (7.21) (our emphasis). The plan goes on to state: "Special consideration should be given to the impact of proposals on the setting of the AONB and on views into or out of the area" (7.21).

In addition, the pre-submission version of the emerging Joint Core Strategy states in Policy SD8:

Cotswolds Area of Outstanding Natural Beauty (AONB):

All development proposals in or adjacent to the Cotswolds AONB will be required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and

other special qualities. Proposals will be required to be consistent with the policies set out in the Cotswolds AONB Management Plan. The further information supplied as a part of this consultation indicates an area of lower/medium density development to the south of the proposed built area. If the LPA is minded to grant permission, we would strongly advise using this 'medium and lower density edge character area' to create a soft edge to the developed area, in order to help mitigate the impacts of this development on views from the AONB. This could include the provision of high standards of urban greening, including street SuDS, grass verges, street planting and trees, front gardens and green roofs. As the design of the built environment is to be resolved through reserved matters, we would recommend that the Council secures urban greening measures as mitigation for visual impacts on the Cotswolds AONB through an appropriately worded planning condition. We consider that this would improve but not fully resolve the proposals compliance with local policy.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Hayley Fleming on 0300 060 1594. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Gloucestershire Centre for Environmental Records
3rd October 2013

GCER
Gloucestershire Centre for Environmental Records

GCER Report for planning application: 13_01605_OUT

Search area: **500m** from easting and northings Eastings(393926), Northings(220156)

Species of conservation importance recorded within the area of search

Taxon group	Scientific name	Common Name	Grid Reference	Year last recorded	Distance from app point (m)	Location	Species Status
Legally Protected Species - International							
bird	Carduelis carduelis	European Goldfinch	SO934201	2012	480	Grdn, Cheltenhan, Albans Close	Bern-A2
bird	Carduelis chloris	European Greenfinch	SO934201	2012	480	Grdn, Cheltenhan, Albans Close	Bern-A2
bird	Cyanistes caeruleus	Blue Tit	SO934201	2012	480	Grdn, Cheltenhan, Albans Close	Bern-A2
bird	Erithacus rubecula	European Robin	SO934201	2012	480	Grdn, Cheltenhan, Albans Close	Bern-A2
bird	Parus major	Great Tit	SO934201	2012	480	Grdn, Cheltenhan, Albans Close	Bern-A2
bird	Periparus ater	Coal Tit	SO934201	2012	480	Grdn, Cheltenhan, Albans Close	Bern-A2
bird	Prunella modularis	Hedge Accentor	SO934201	2012	480	Grdn, Cheltenhan, Albans Close	Bern-A2, Bird-Amber
bird	Sturnus vulgaris	Common Starling	SO934201	2012	480	Grdn, Cheltenhan, Albans Close	Bird-Red, BirdsDir-A2.2
bird	Troglodytes troglodytes	Winter Wren	SO934201	2012	480	Grdn, Cheltenhan, Albans Close	Bern-A2
bird	Turdus iliacus	Redwing	SO934201	2012	480	Grdn, Cheltenhan, Albans Close	Bird-Red, BirdsDir-A2.2, WACA-Sch1_part1
bird	Turdus philomelos	Song Thrush	SO934201	2012	480	Grdn, Cheltenhan, Albans Close	Bird-Red, BirdsDir-A2.2
bird	Turdus pilaris	Fieldfare	SO934201	2012	480	Grdn, Cheltenhan, Albans Close	Bird-Red, BirdsDir-A2.2, WACA-Sch1_part1
reptile	Anguis fragilis	Slow-worm	SO935204	2009	480	Leckhampton, Hazlewood Close	UK Priority Species 2007, Bern-A3, England NERC S.41, WACA-Sch5_sect9.1(kill/injuring), WACA-Sch5_sect9.5a, WACA-Sch5_sect9.5b
reptile	Anguis fragilis	Slow-worm	SO936203	1992	340	Warden Hill	UK Priority Species 2007, Bern-A3, England NERC S.41, WACA-Sch5_sect9.1(kill/injuring), WACA-Sch5_sect9.5a, WACA-Sch5_sect9.5b
bird	Dendrocopos minor	Lesser Spotted Woodpecker	SO939197	2000	410	Leckhampton, Brizen FramSO939197	Bern-A2, Bird-Red
bird	Carduelis carduelis	European Goldfinch	SO939203	1995	200	LECKHAMPTON GREEN	Bern-A2
bird	Erithacus rubecula	European Robin	SO939203	1995	200	LECKHAMPTON GREEN	Bern-A2
bird	Falco tinnunculus	Common Kestrel	SO939203	1995	200	LECKHAMPTON GREEN	Bern-A2, Bird-Amber
bird	Parus major	Great Tit	SO939203	1995	200	LECKHAMPTON GREEN	Bern-A2
bird	Prunella modularis	Hedge Accentor	SO939203	1995	200	LECKHAMPTON GREEN	Bern-A2, Bird-Amber
bird	Carduelis chloris	European Greenfinch	SO941203	1995	300	LECKHAMPTON GREEN	Bern-A2
bird	Cyanistes caeruleus	Blue Tit	SO941203	1995	300	LECKHAMPTON GREEN	Bern-A2
bird	Dendrocopos major	Great Spotted Woodpecker	SO941203	1994	300	LECKHAMPTON GREEN	Bern-A2
bird	Erithacus rubecula	European Robin	SO941203	1995	300	LECKHAMPTON GREEN	Bern-A2
terrestrial mammal	Meles meles	Eurasian Badger	SO941203	1995	300	LECKHAMPTON GREEN U	Bern-A3, Protection of Badgers Act (1992)
bird	Parus major	Great Tit	SO941203	1995	300	LECKHAMPTON GREEN	Bern-A2
bird	Picus viridis	Green Woodpecker	SO941203	1994	300	LECKHAMPTON GREEN	Bern-A2, Bird-Amber
bird	Prunella modularis	Hedge Accentor	SO941203	1995	300	LECKHAMPTON GREEN	Bern-A2, Bird-Amber
bird	Alcedo atthis	Common Kingfisher	SO942198	1995	450	LECKHAMPTON GREEN	Bern-A2, Bird-Amber, BirdsDir-A1, WACA-Sch1_part1
bird	Carduelis carduelis	European Goldfinch	SO942198	1995	450	LECKHAMPTON GREEN	Bern-A2
bird	Carduelis chloris	European Greenfinch	SO942198	1995	450	LECKHAMPTON GREEN	Bern-A2
bird	Cyanistes caeruleus	Blue Tit	SO942198	1995	450	LECKHAMPTON GREEN	Bern-A2
bird	Delichon urbicum	House Martin	SO942198	1995	450	LECKHAMPTON GREEN	Bern-A2, Bird-Amber
bird	Erithacus rubecula	European Robin	SO942198	1995	450	LECKHAMPTON GREEN	Bern-A2
bird	Falco tinnunculus	Common Kestrel	SO942198	1995	450	LECKHAMPTON GREEN	Bern-A2, Bird-Amber
bird	Hirundo rustica	Barn Swallow	SO942198	1995	450	LECKHAMPTON GREEN	Bern-A2, Bird-Amber
bird	Parus major	Great Tit	SO942198	1995	450	LECKHAMPTON GREEN	Bern-A2
bird	Picus viridis	Green Woodpecker	SO942198	1995	450	LECKHAMPTON GREEN	Bern-A2, Bird-Amber
bird	Prunella modularis	Hedge Accentor	SO942198	1995	450	LECKHAMPTON GREEN	Bern-A2, Bird-Amber
bird	Troglodytes troglodytes	Winter Wren	SO942198	1995	450	LECKHAMPTON GREEN	Bern-A2
bird	Carduelis carduelis	European Goldfinch	SO943202	2012	435	Grdn, Cheltenham, Osprey Road	Bern-A2
bird	Chroicocephalus ridibundus	Black-headed Gull	SO943202	2012	435	Grdn, Cheltenham, Osprey Road	Bird-Amber, BirdsDir-A2.2
bird	Cyanistes caeruleus	Blue Tit	SO943202	2012	435	Grdn, Cheltenham, Osprey Road	Bern-A2
bird	Dendrocopos major	Great Spotted Woodpecker	SO943202	2012	435	Grdn, Cheltenham, Osprey Road	Bern-A2
bird	Erithacus rubecula	European Robin	SO943202	2012	435	Grdn, Cheltenham, Osprey Road	Bern-A2
bird	Parus major	Great Tit	SO943202	2012	435	Grdn, Cheltenham, Osprey Road	Bern-A2
bird	Periparus ater	Coal Tit	SO943202	2012	435	Grdn, Cheltenham, Osprey Road	Bern-A2
bird	Prunella modularis	Hedge Accentor	SO943202	2012	435	Grdn, Cheltenham, Osprey Road	Bern-A2, Bird-Amber
bird	Troglodytes troglodytes	Winter Wren	SO943202	2012	435	Grdn, Cheltenham, Osprey Road	Bern-A2
bird	Turdus iliacus	Redwing	SO943202	2012	435	Grdn, Cheltenham, Osprey Road	Bird-Red, BirdsDir-A2.2, WACA-Sch1_part1
Legally Protected Species - Britain							
bird	Passer domesticus	House Sparrow	SO934201	2012	480	Grdn, Cheltenhan, Albans Close	UK Priority Species 2007, Bird-Red, England NERC S.41
bird	Cuculus canorus	Common Cuckoo	SO938200	1995	135	LECKHAMPTON GREEN	UK Priority Species 2007, Bird-Red, England NERC S.41
flowering plant	Hyacinthoides non-scripta	Bluebell	SO941203	1995	300	LECKHAMPTON GREEN	WACA-Sch8
bird	Passer domesticus	House Sparrow	SO941203	1995	300	LECKHAMPTON GREEN	UK Priority Species 2007, Bird-Red, England NERC S.41
bird	Passer domesticus	House Sparrow	SO942198	1995	450	LECKHAMPTON GREEN	UK Priority Species 2007, Bird-Red, England NERC S.41
bird	Turdus iliacus	Redwing	SO942198	1995	450	LECKHAMPTON GREEN	Bird-Red, BirdsDir-A2.2, WACA-Sch1_part1
bird	Turdus pilaris	Fieldfare	SO942198	1995	450	LECKHAMPTON GREEN	Bird-Red, BirdsDir-A2.2, WACA-Sch1_part1
bird	Passer domesticus	House Sparrow	SO943202	2012	435	Grdn, Cheltenham, Osprey Road	UK Priority Species 2007, Bird-Red, England NERC S.41
bird	Pyrrhula pyrrhula	Common Bullfinch	SO941203	1995	300	LECKHAMPTON GREEN	Bird-Amber
bird	Sturnus vulgaris	Common Starling	SO941203	1995	300	LECKHAMPTON GREEN	Bird-Red, BirdsDir-A2.2
bird	Anas platyrhynchos	Mallard	SO942198	1995	450	LECKHAMPTON GREEN	Bird-Amber, BirdsDir-A2.1
bird	Apus apus	Common Swift	SO942198	1995	450	LECKHAMPTON GREEN	Bird-Amber
bird	Larus argentatus	Herring Gull	SO942198	1995	450	LECKHAMPTON GREEN	Bird-Red, BirdsDir-A2.2
bird	Larus canus	Mew Gull	SO942198	1995	450	LECKHAMPTON GREEN	Bird-Amber, BirdsDir-A2.2
bird	Larus ridibundus	Black-headed Gull	SO942198	1995	450	LECKHAMPTON GREEN	Bird-Amber, BirdsDir-A2.2
bird	Phylloscopus trochilus	Willow Warbler	SO942198	1995	450	LECKHAMPTON GREEN	Bird-Amber
bird	Sturnus vulgaris	Common Starling	SO942198	1995	450	LECKHAMPTON GREEN	Bird-Red, BirdsDir-A2.2
bird	Turdus philomelos	Song Thrush	SO942198	1995	450	LECKHAMPTON GREEN	Bird-Red, BirdsDir-A2.2
bird	Turdus viscivorus	Mistle Thrush	SO942198	1995	450	LECKHAMPTON GREEN	Bird-Amber, BirdsDir-A2.2
UK Priority Species and other locally important species							

Sites of conservation importance recorded within, or overlapping, the area of search

APAs, SNCIs, Ramsar
None present within 500m

SSSIs
None present within 500m

Key Wildlife Sites
None present within 500m

Unconfirmed Sites

Site name	Reasons for selection	Distance from app point(m)
Leckhampton Green U	Phase one survey area: improved arable, orchards and semi-improved meadows with hedges	0

Search area location



Campaign To Protect Rural England
31st October 2013

Set out below are CPREs comments on the above application. In considering this application our comments cover a variety of concerns, including traffic issues, the impact upon the AONB and aspects of design and layout.

Introduction
The area is not within the Cheltenham Gloucester Green Belt or Cotswolds AONB, nevertheless this is a highly sensitive location. The outline application occupies part of a strategic land allocation identified as South Cheltenham ' Leckhampton Urban Extension in the Draft JCS for Gloucester, Cheltenham and Tewkesbury. The land allocation in the JCS identifies this area of South Cheltenham potentially as a suitable location for approximately 1,075 homes.

It is essential to stress that just because a site has been identified in the Draft JCS Consultation document it does not and should not lead to the presumption that any application submitted must be automatically approved. It must be considered on its own merits.

In this respect CPRE has three principal concerns namely:
- the effect that this scale of development would have in worsening traffic congestion along the A46 with consequential implications for existing employment in Cheltenham and elsewhere;
- the impact that the development would have on the setting of the Cotswolds AONB and the loss of high quality agricultural land. The site is highly visible from the escarpment to the south and in turn the view of the escarpment from the site is a highly valued feature of this part of Cheltenham, and
- the principles on which the design and layout have been based.

Traffic
CPRE is exceptionally concerned by the applicant's failure to provide a comprehensive analysis of the potential impact of the scheme on:
- traffic congestion on the A46
- junction capacities
- highway safety
- pedestrian routes and safety
- public transport including the physical ability of the A46 to accommodate a bus lane

Traffic congestion along the A46 (part of the strategic highway network) feeding into Bath Road, already causes very significant delays for existing commuters into and out of Cheltenham.

CPRE has noted and supports the concerns expressed by the Chamber of Commerce over increasing congestion along this route as a deterrent to existing and future employers locating in the town centre. In this respect the applicant's traffic projection of nearly a quarter (23%) increase requires the closest scrutiny.

Unfortunately the applicant has failed to provide a comprehensive analysis of future traffic movements, in particular around existing and proposed junctions in the area. The scheme can only compound problems of congestion along the Shurdington Road by the introduction of priority access junctions from the site to accommodate additional bus and vehicular movements.

Whilst some aspects of highway safety have been considered it appears that no consideration has been given to the likely impact of increased traffic flows on accident statistics. Of particular concern is the provision of safe pedestrian routes and crossings on the A46, including the physical challenge of providing a footpath on its southern side. We also note the failure to provide a full 'walking audit' to key facilities including schools.

To compound all these potential problems it appears that the Shurdington Road is incapable of being adapted to incorporate a dedicated bus lane or other public transport priority measures.

The overall lack of information, with its consequent failure to demonstrate the impact of this proposal, suggests that the applicant has been unable to find a workable solution to accommodate the additional traffic movements that will be generated by the development. As a result the scheme clearly fails to meet the accepted standards on which to make a sound decision.

Setting of the AONB
Addressing the issue of landscape impact, we note that the applicant is proposing to protect, from future development, an area of open land to the south by way of a planning covenant as part of the s106 Planning Obligation. The application shows this area as allotments, a community orchard and strategic open space. It is essential that this open land is protected from development in perpetuity. Appropriate mechanisms could include designating the land as Local Green Space as provided for in the NPPF (paragraphs 76 and 77) or as a Village Green under Common Land legislation.

Additionally, a significant proportion of the site is classified as being of high quality and versatility ' Grade 2 and Grade 3a. Development here therefore clearly conflicts with paragraph 112 of the NPPF.

Policy S7 of the Draft JCS states that 'Development proposals in and adjacent to the AONB will be required to conserve and enhance landscape, scenic beauty, wildlife, cultural heritage and other special qualities of the Cotswolds AONB and be consistent with the policies set out in the Cotswolds AONB Management Plan.'

Further the Cotswolds AONB Management Plan LK3 states ' 'The surroundings of the AONB are also important to its landscape character and quality. Views out of the AONB and into its surrounding areas can be very significant. Development proposals that affect views in and out of the AONB need to be carefully assessed in line with Planning Policy Statement 7 (now superseded by the equally strong protected landscape policies contained in paras 115 and 116 of the NPPF) to ensure that they conserve and enhance the natural beauty and landscape character of the AONB.'

We note that Cheltenham CBC endorsed the Cotswolds AONB Management Plan (2008 - 13), and included the following paragraphs in the Cheltenham Local Plan:-

Para 7.22 - "In assessing proposals for development, the Council will be guided by the advice of the Cotswolds AONB Conservation Board ....." and in Para 7.23 ' that any revision of advice "issued by the Cotswolds AONB Conservation Board will be adopted by the Council and used as guidance for development control purposes". This formal policy must therefore form a key part of the Council's context for assessing the current application.

All the above provide excellent reasons upon which to base a refusal and in addition we would stress that in seeking to protect the setting of the AONB it is of equal importance to consider the invaluable role the site plays in terms of its local amenity value and its open views of the AONB escarpment as part of the setting of Cheltenham.

Design and layout
In the centre of the site the Residential Density Plan shows a density of 41 to 55 dwellings per hectare. Normally CPRE supports relatively high densities for urban areas as a means to assist in reducing the land take from open countryside. However, in this case the proposed density is clearly inconsistent with the landform, location and existing adjacent housing and is therefore unsympathetic to its surroundings. Indeed, the Design and Access Statement's claim that the average site density of 42dph is reflective of the nearby densities is highly questionable.

Whilst the general decrease in housing density across the site from north to south is welcome, the positioning of land uses and the resultant massing and density shown in the proposed layout takes little account of exceptionally important existing views across the site to the escarpment from Shurdington Road.

This concern is reinforced by the proposal that housing fronting Shurdington Road would be at the highest density (40 to 55dph) in order to create a 'strong sense of enclosure' and to reflect densities near the Bath Road. We believe that this is both an inappropriate approach to design on the site and a questionable analogy, as most areas adjacent to the Bath Road comprise retail uses with single storey storage or flats above.

The developer's intention is that some 2.5 storey homes (up to a maximum of 20% in the vicinity of the local centre) will be provided. It is also the intention that 33% of the total provision is limited to 2 storey buildings. The taller buildings (over 2 storeys) therefore will be taller than surrounding existing properties. These proposals will undoubtedly adversely affect views from existing housing on Shurdington Road, Kidnappers Lane and other surrounding residential areas.

The developers' claim to provide a view across the site along a main street which includes a square and runs from Shurdington Road towards the indicative open space needs close scrutiny. The presence of a square and 90 degree angle on this road would however obscure or prevent such a view being possible from the A46 to the area south of the site.
This loss of view will be further compounded by the proposal for office buildings of 2.5 stories on the site. The applicant seeks to justify the proposal as needed to ensure the development is viable and to reflect building heights on the Bath Road is questionable.

First, the analogy with Bath Road is entirely inappropriate on this part of the A46. It suggests the developer is clutching at straws in an attempt to justify the design.

Second, not only will the offices be visually intrusive but also the statement suggests that any change to their design will threaten the viability of the proposal to provide a range of services, facilities and a relatively high proportion of affordable dwellings. It is therefore essential that this application is closely scrutinised by the Borough Council in order to determine whether:-

- its 'offers' to provide facilities and services are economically viable and sustainable or whether
- if permission were to be granted, a series of alterations will end up being proposed to the site whereby it ultimately ends up merely providing market housing and few facilities.

Importantly, at present, the application proposes that 40% of the 650 homes will be affordable. We note from the JCS Consultation Report that if market conditions dictate the level of affordable housing provision it will be revised in accordance with future SHMA reports. The uncertainty over the number of affordable houses that could potentially be delivered by this site is exceptionally unhelpful and indicates a concern over whether this application should be deemed to be 'premature' at this time.

We also note that the application includes the provision of a care home and that some associated facilities are proposed to be provided on site, such as shops, a pharmacy and a doctor's surgery. However, the site is approximately 3km (1.8 miles) from other facilities provided in, or near, the town centre. Leisure facilities and the hospital for example are not readily accessible therefore this site may not be the best location for elderly residents.

The application also indicates that the existing doctors' surgery at Moorend Park Road, Leckhampton is intending to relocate to a purpose built facility as part of the local centre hub on this site. Importantly, this practice serves a large existing residential area and patients can currently walk to the surgery. Any relocation will increase journeys by car to the new facility which will be beyond easy walking distance for many existing patients.

Taken together the issues outlined above demonstrate that the application fails on many levels to provide a sustainable or sympathetic form of development on this site and would significantly detract from the amenities currently enjoyed by local residents and those accessing Cheltenham from the south.

Conclusion
CPRE Gloucestershire strongly recommends that the application be rejected on the grounds of its failure to provide a sustainable solution to the traffic issues highlighted in this representation, its impact upon the AONB and the local character and amenities of the area, or be deferred due to a lack of critical supporting information and its failure to meet the Draft JCS Consultation document requirement 'to demonstrate how the strategic allocation can be developed as a comprehensive urban extension'.

Chairman, CPRE Cheltenham Gloucester and Tewkesbury District

17th July 2014

Given that the JCS Pre-Submission Document has been published, whilst CPRE Gloucestershire has significant reservations about the total number and type of dwellings and the identification of Strategic Allocations, this application must now be judged against the policies set out in the current JCS document, together with the extant Local Plan policies.

It is essential that Members do this as the current application potentially marks the first key step in the implementation of the Plan. Against this background, Members must be satisfied that the application accords with the suite of policies contained in the Draft JCS. If these tests cannot be met then the current application must be refused.

To assist Members we have set out the following key policy requirements which must be met:

Strategic Objective 8: Delivering a wide choice of quality homes - page 22
Policy SA1: Strategic allocations Policy, paragraph 6 - page 123
Policy SD5: Design Requirements, paragraphs 1 and 2 - page 51
Policy SD5d: Masterplans and Design Briefs, paragraphs (i) and (ii) - page 57
Policy SD8: AONB setting - page 68
Policies SD12 and **SD13:** Housing Mix and Standards: Including reference to the need to provide 40% affordable housing on major sites - page 84 and 87
Policy INF1: Access to Highway Network, paragraphs 1(i) to (iv) - page 100
Policy INF2: Safety and Efficiency of the Transport Network paragraphs 1 and 2 - page 101
Policy INF7: Infrastructure Delivery paragraphs 1 and 2 - page 117
Policy INF8: Developer Contributions paragraphs 1 and 2 - page120
Policy A6: South Cheltenham – page 137 There is an outstanding application for a Local Green Space designation which could be compromised by the approval of this application.

There is much uncertainty over the extent of land which will need to be allocated for development at strategic sites, particularly in light of the revised ONS forecasts for the JCS area. Major development at any of the proposed strategic sites could therefore be deemed as premature before the JCS has been independently examined and formally adopted by the three councils.

Importantly, any approval of this major application where it conflicts with the policy requirements adopted by the three local authorities and listed above, would clearly indicate that the implementation of the JCS is unachievable and therefore unsound. To do otherwise would set an unfortunate precedent that would undermine the finalisation of the JCS.

English Heritage
4th October 2013

Thank you for your letter of 20 September 2013 notifying English Heritage of the scheme for planning permission relating to the above site. Our specialist staff have considered the information received and we do not wish to offer any comments on this occasion.

Recommendation
The application(s) should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice. It is not necessary for us to be consulted again on this application. However, if you would like further advice, please contact us to explain your request. We can then let you know if we are able to help further and agree a timetable with you.

29th May 2014

Thank you for your letter of 12 May 2014 notifying English Heritage of amendments to the scheme for planning permission relating to the above site. Our specialist staff have considered the information received and we do not wish to offer any comments on this occasion.

Recommendation
The application(s) should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

It is not necessary for us to be consulted again on this application. However, if you would like further advice, please contact us to explain your request. We can then let you know if we are able to help further and agree a timetable with you.

Shurdington Parish Council
17th October 2013

We consider that many of our objections to the previous applications for this and the adjacent land in Shurdington (part of Tewkesbury borough), that is not included in this application, remain valid for this application even though things are moving on in the development of a draft JCS which is well advanced.

The Joint Core Strategy and Local plans are not yet complete. Therefore it is premature for Cheltenham Borough Council to decide on this application. At the very least it needs to be considered as part of an overall cohesive development plan.

In addition we reiterate some specific concerns:

If this application is allowed than how can further applications be rejected? Is this acceptable to Cheltenham Borough Council, as the result will be well on the way to complete the coalescence between Cheltenham and Shurdington village?

1. To preserve the setting and special character of historic towns. The fields are ancient arable lands with ridge and furrow ploughing to improve drainage with open views towards the Cotswold escarpment from the area. The setting is important for tourism in and around Cheltenham. The view from the AONB Cotswold escarpment will be negatively impacted.

2. Traffic congestion through Shurdington Village and along the A46 and Leckhampton Lane

3. The A46 trunk road was constructed in 1820 through Shurdington village and is still the original width and lined with houses. Shallow front gardens have restricted any widening of the carriageway.

4. In 2013 the A46 becomes more dangerous with each new development. Footways are inadequate or non-existent and the carriageway is too narrow and restricted by housing development for bus lanes or even cycle lanes. Standing at some of the bus stops is dangerous.

5. Access is now very difficult for cars and extremely hazardous for pedestrians and cyclists. Tragically two elderly parishioners have been killed since 2008 and there have been a number of serious injuries.

6. There is continuous traffic in both directions and long tailbacks at rush hours. When the M5 is diverted severe blockages result; often lasting several hours. The large developments at Brockworth have resulted in a significant traffic increase, both commercial and private.

7. All the potential new development seems to be assessed individually rather than looking at the overall problem. The Shurdington Rd is at a standstill in rush hours and traffic goes dangerously fast off peak. The amount of traffic using Leckhampton Lane has already increased significantly and as such it is becoming more dangerous. Speed needs to be effectively controlled with or without any further development.

8. Some years ago when the proposal for a Shurdington bypass was removed from the plans, measures were promised to reduce the impact of high volumes of traffic. Nothing has happened. Now it is much worse and this application will add to the problems.

Other concerns

9. Housing development should be demand driven not developer driven.

10. We believe that it is important to protect agricultural green belt land, even lower grade land such as the Brizen site, for reasons of food security.

11. Flooding: apart from the serious floods of 2007 it is known that major flooding has occurred in the Chargrove / Brizen area in other years. Building will accentuate the problem of flood water which passes over the A46 onto houses and businesses on the opposite side of the road. Shurdington Parish Council has little confidence in the anti-flooding proposals.

Area Planning

Shurdington Parish Council considers that the JCS and local plan should be completed prior to consideration of this or any other large development. Consent should not be given on a piece-meal basis.

Shurdington Parish Council opposes any major housing developments which will further aggravate the present issues in the village and therefore opposes major housing development such as this just outside the parish.

Gloucestershire Bat Group
14th October 2013

Thank you for informing the Bat Group about this development, however, we do not comment on planning applications unless a particular bat issue is brought to our attention.

I would like to draw your attention to the fact that all our records are forwarded to the Gloucestershire Centre for Environmental Records. Should there be any doubt concerning the presence of bats in an area these records may be accessed by planning authorities free of charge. An absence of bat records should not be taken to imply an absence of bats.

Tewkesbury Borough Council
27th December 2013

Comments attached at end of this document

National Planning Casework Unit
6th November 2013

We acknowledge receipt of your letter of 20 September 2013 enclosing the Environmental Statement for the above development.

Cheltenham Civic Society
2nd October 2013

We appreciate the need for more houses in Cheltenham, and we do accept that this is a suitable site for new housing. We are therefore broadly in favour of the development. Nevertheless, there are already important congestion issues in Church Road and Shurdington Road which need to be resolved, and which must not be allowed to get worse as the result of this development.

Cotswold Conservation Board
21st November 2013

Comments attached at end of this document

County Archaeology
1st October 2013

In connection with the above planning application I wish to make the following observations regarding the archaeological implications of development.

I advise that I have checked the application site against the County Historic Environment Record: the wider locality is known to contain extensive archaeological remains relating to later prehistoric, Roman and medieval activity and settlement.

I note that this planning application is supported by an Environmental Statement which is informed by reports presented in Appendix 7 on archaeological investigations comprising a heritage desk-based assessment (RPS Planning and Development, April 2010), a magnetometer survey (Archaeological Surveys Ltd, February 2011) and an archaeological evaluation (Cotswold Archaeology, January 2012).

The results of these investigations were positive in that the investigations identified a number of archaeological features indicative of activity and settlement for which dating evidence was generally sparse. However, the presence of a Roman ditch and a number of intercutting medieval ditches indicates a likely date range.

However, it should be noted that the consideration of archaeological impact is incomplete because there are large areas within the application site where no survey or evaluation was undertaken, and where the archaeological potential is therefore unknown. Areas for which no information is available include the majority of the land fronting onto Shurdington Road, as well as portions of the central and southern areas of the application site.

Therefore, in accordance with the NPPF, paragraph 128, I recommend that in advance of the determination of this planning application the applicant should provide the results of assessment and evaluation within those areas not previously investigated, so as to allow an informed planning decision to be made regarding archaeological impact within the whole of the application site.

I look forward to advising you further when this information is provided.

14th May 2014

ADDITIONAL INFORMATION: archaeological implications

Thank you for consulting me concerning the additional information recently submitted in connection with the above planning application, which I note includes an illustrative masterplan (dated March 2014) and also an Addendum to the Design and Access Statement (dated April 2014).

As regards archaeology the position is unchanged in that, as iterated in my letter of 1.10.2013 there are considerable areas of the application site where no survey or evaluation has been undertaken, and where the archaeological potential is therefore unknown. I confirm that areas of the application site for which no archaeological information is available include the majority of the land fronting onto Shurdington Road, as well as large portions of the central and southern areas of the proposed development area.

Therefore, as previously recommended in my letter of 1.10.2013, I recommend that in advance of the determination of this planning application the applicant should provide the results of assessment and evaluation within those areas not previously investigated, to allow an informed planning decision to be made regarding archaeological impact within the whole of the application site, so as to accord with the NPPF, paragraph 128.

I look forward to advising you further when this information is provided.

Environment Agency

21st May 2014

The Environment Agency has no objections to the principle of development, but wishes to make the following comments and recommends the conditions within this letter are attached to any permission granted.

FLOOD RISK AND DRAINAGE

We have reviewed the submitted Flood Risk Assessment and Drainage Strategy (FRA)undertaken by THDA Consulting Engineers, reference 10-0498 and dated September 2013. This document is in part based upon the flood model report undertaken by JBA Ltd in May 2012 (ref. 2010s4530) and following consultation and additional surveying the phase two report (ref. 2013s6851), also completed by JBA. We previously commented on earlier drafts of these documents at the pre-application stage.

Flood Risk:

Our Flood Zone Maps indicate the site is predominantly within Flood Zone 1 with small areas of Flood Zones 3 and 2 adjacent to some of the watercourses and a further area of Flood Zone 2 roughly at the centre of the site. Given the presence of Flood Zones at the site, you should be satisfied that the applicant has appropriately considered/undertaken a Sequential Test in accordance with paragraphs 100-104 of the National Planning Policy Framework (NPPF).

Our Flood Maps are however indicative and the applicant's more detailed FRA and associated modelling report have adequately considered the risk of fluvial flooding to the development. We have previously provided detailed comments on this at the preapplication stage. We are satisfied that the proposed development is not at an unacceptable risk of flooding, and is in accordance with the NPPF and local flood risk policy.

In addition we note the FRA has considered other sources of flooding within Section 14. Under the terms of the Flood and Water Management Act 2010 the Environment Agency leads on fluvial flooding and has an overview for all forms of flood risk. However the Lead Local Flood Authority (LLFA) now leads on other sources of flooding, including ground and surface water

flooding. Accordingly, whilst we are satisfied with the information on other sources of flooding in the FRA, we recommend you consult with the LLFA for any detailed comments in this regard.

The FRA has sought opportunities to reduce the probability and consequences of flooding as part of the development. Whilst we entirely support the proposals to affect this through the drainage of surface water there appears to be the scope to do more. Given the potential for residual flood risk in exceedence events through increased flows to watercourses, we consider it would be appropriate to do more to hold water back at this location. It appears that the proposed open space within the south east corner of the site (strategic open space) offers an ideal storage area which could be re-profiled and used to store water and reduce the risk of flooding downstream in extreme or exceedence events. Our historic records show that the area to the north of the site has flooded previously as highlighted within the FRA. Given its position within the catchment, this area will likely be most at risk during heavy rainfall events such as the 2007 and 2012 as referenced within Section 10 of the FRA.

We do not consider this to be a matter of principle; rather it can be delivered at the reserved matters stage through the detailed landscaping and drainage proposals for this part of the site. Accordingly we would seek to influence this element of the detailed design at either the reserved matters or discharge of condition stage if permission is granted.

Opportunities for Off-Site Flood Relief Works:
Should the above suggested flood risk mitigation measures not be feasible at the detailed design stage, we consider it would be appropriate to seek a financial contribution from the developer to address existing off-site flooding to properties to the north of the site. For example property level protection could be delivered for those existing properties that suffered flooding in 2007. (The justification for this, being mindful of the requirements of paragraphs 203-206 of the NPPF, would be the residual risk of flooding in an exceedance event.) For such a scheme to be delivered we would anticipate the Local Authority and LLFA would need to establish a project for the works which relevant development contributions could feed-into. Any such scheme should also have regard to potential future development proposals in the area and there may be opportunities to deliver flood risk improvements as a result of the wider development proposals in Leckhampton and Warden Hill. We would be happy to discuss such options with you in more detail.

Access:
We recognise that access to and from the site will be maintained during a flood event however Kidnappers Lane may be subject to overland flows when the capacity of the culvert is exceeded. Given this appears to have been considered within the design we have no major concerns in this regard however you may wish to consider the possible safety implications of such an occurrence, or indeed any traffic impacts. A consideration at the detailed stage may be the requirement to erect signage to inform people that the road is liable to flooding.

Surface Water Drainage:
Since the Flood and Water Management Act of 2010, the responsibility for surface water flood risk and drainage has passed to the LLFA. We do retain an overview for all forms of flood risk, and in accordance with this we have the following comments on the surface water drainage:

The drainage of surface water from the site is critical given its location within the catchment (i.e. at the top of the catchment). We usually recommend the existing rate of run-off is calculated using both of the approved techniques and the most precautionary figure used to inform the design parameters.

We note the proposed balancing ponds have been removed from the recorded flood areas in accordance with our recommendations. We also acknowledge the comments in relation to these ponds and the proposals to deal with any groundwater issues in this regard. The

implications of such proposals should be considered by any company or body taking on the maintenance of these structures.

In addition we have previously highlighted the height of a number of the ponds in relation to adjacent ground levels (i.e. the ponds being sited above surrounding ground levels). Whilst this is not best practice as previously advised, we are satisfied with the measures introduced to deal with an exceedence event, for example freeboard and overflow path. However we recommend you consult the LLFA on this specific matter, and any maintenance body should be mindful of this issue as the ponds should be maintained to a standard to avoid a sudden failure.

Whilst the ponds have been designed appropriately in terms of surface water storage and attenuation more could be done to encourage surface water treatment and enhance biodiversity. We appreciate however that these are only the outline proposals and the detailed design will most likely be approved at a later date. This design should accord with CIRIA C697 as recommended within the FRA.

It is recognised that petrol interceptors are to be provided within the treatment train. We would encourage the applicant to include an additional SuDS feature rather than oil interceptors, for example porous paving or swales. We also encourage the applicant to consider other SuDS techniques such as green roofs/walls and rainwater harvesting on larger more suitable buildings such as the commercial buildings, local centre and school. It is unclear why such techniques have not been considered for these areas as such features provide multiple benefits to a development.

Flood Defence Consent: There are a number of ordinary watercourses on the site which are tributaries to the Hatherley Brook, including the watercourse along the eastern edge of the site which is designated as a main river. Works in, on, under or over, or within 8 metres of the top of bank of this watercourse will require Flood Defence Consent from us (other non-main watercourses are Consented by the LLFA).The FRA has correctly identified the requirements of the Water Resources Act (1991), Land Drainage Act (1991) and Midlands Land Drainage Byelaws in this regard. For any such permissions required from the Environment Agency the applicant is advised to contact Matt Kerry of our Partnerships and Strategic Overview Team on (01684) 864349.

Flood Risk and Drainage Conclusion:
We have no objections to the principle of development subject to the inclusion of suitable conditions. We are satisfied that the proposals are acceptable in terms of flood risk and drainage in accordance with our overview for all forms of flooding. There are additional aspects that could be incorporated at the detailed stage to ensure the development is more sustainable. We recommend you also consult with the LLFA for its views on the proposals. If you are minded to approve this application we request that the following conditions are attached to the decision notice:

Condition: Prior to any development on site the detailed design of the proposed land raising within residential area C shall be submitted to, and agreed in writing by, the Local Planning Authority.

Reason: To ensure that the new development does not increase flooding to the site itself or adjacent existing development.

Note: As detailed on drawing reference 10-0498 100 Rev 1 (dated May 2011) some minor re-profiling is necessary to re-direct surface water flows away from the proposed development areas. As detailed above the opportunity could be taken to formally reprofile other areas around the open space to hold back water from property downstream.

Condition: No development layout shall be approved until full drainage details, incorporating sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development, have been submitted to and agreed in writing by the local planning authority.

Reason: To ensure that the new development does not increase flooding to the site itself or adjacent existing development. To ensure opportunities to improve water quality and biodiversity and reduce flood risk are maximised.

Note: We would anticipate the LLFA would lead on the detailed drainage design and commenting on the proposals at the reserved matters/discharge of condition stage. However given the importance of the drainage details and the opportunities for reducing flood risk we would appreciate making some comments at the detailed stage as part of our 'strategic overview' role. As a minimum we would expect the drainage proposals to correspond with the preliminary design detailed within the FRA.

ECOLOGICAL PROTECTION AND ENHANCEMENT

We refer you to the advice of Natural England for the majority of ecological protection and enhancement matters, particularly where these relate to protected species. We have the following additional advice on ecological matters that relate to the water environment:

Water Framework Directive:

Protection of the water environment is particularly important due to the requirements of the Water Framework Directive (WFD). The WFD sets a target of achieving 'good status' or 'good potential' in all water bodies and there must be no deterioration in the existing status of water bodies. Development needs to be planned carefully so that it does not result in deterioration or further pressure on the water environment and compromise WFD objectives. Wherever possible opportunities should be sought for development to contribute to improvements in water body status, for example by improving water quality, fisheries and hydromorphology, and by encouraging groundwater recharge.

The Hatherley Brook is classified as moderate due to its phosphate levels. These levels are likely to be from urban drainage within Cheltenham. We note and welcome the information submitted within the FRA relating to the foul drainage and sewerage capacity following the applicant's consultation with Severn Trent Water.

As indicated above, any new developments should incorporate SuDS to improve the quality of surface water runoff that enters the Hatherley Brook. These drainage systems should incorporate open conveyance through swales, rain gardens and ponds. This should ensure that the water quality of rainwater runoff is improved which will help to meet the aims of the WFD. We note the current drawings of the balancing ponds do not appear to have been designed to encourage biodiversity. Any pond habitats should maximise the biodiversity value by adhering to pond design principles for biodiversity, including variation of depth and edge structure and ensuring water source is of reasonable quality. For example a combination of permanent open water, submerged aquatic berms, reed `forebays` and variation in contour and cross section of the banks. The successful incorporation of such features can affect the footprint of the pond and therefore the layout of the site but we accept that it is appropriate to submit such specifications at detailed design stage providing there is a commitment in principal at outline.

Protection and Enhancement of Watercourse Habitat:

We welcome the network of terrestrial habitat corridors being retained and enhanced across the site. These should be wide enough to allow for the maintenance and expansion of wildlife populations. Buffer strips should be maximised along river corridors. The minimum width of the habitat corridors along the watercourses is to be a minimum width of 35m and 30m (for Hatherley and the eastern stream respectively) with a maximum width of 144m. We are

satisfied these are appropriate distances provided they are indeed delivered at the detailed stage, and that the quality of habitat delivered is of a high standard.

Where crossings of watercourses are required for essential access roads culvert design should be such that it minimises impacts on the water environment. Any culvert will need to be the shortest length practically possible. In order to minimise the impacts to fish and aquatic wildlife the culvert invert will need to be at least 300mm below design bed level. A minimum water depth of 300mm will need to be maintained and flow will need to be less than 1-1.5m/s.

The presence of Japanese Knotweed on site has potentially significant effects if works cause distribution of it downstream. The Wildlife and Countryside Act 1981 states that it is an offence to "plant or otherwise cause to grow in the wild" any plant listed in Schedule nine, Part II of the Act. The development should accord with the Act. Further advice can be found in our Japanese Knotweed code of practice at
http://www.environment-agency.gov.uk/homeandleisure/wildlife/130079.aspx

Tree and plant species to be planted along the river corridors should include species typically found in riparian habitats including willows. Species to be avoided due to diseases include Ash (*Fraxinus excelsior*) and Alder (*Alnus glutinosa*) but there should be consideration to using native black poplar (*Populus nigra*) but sources must have proven native provenance. We approve of some tree works along the river in principle to improve marginal and in-stream vegetation. We would wish to see a clearer commitment to the replanting of some trees. Furthermore, the cut timbers of any trees felled should be used to construct deadwood habitats, or otter log pile holts.

Otters:
Otters have been recorded downstream on the Hatherley brook and it is likely that they will travel through these small headwaters albeit infrequently. The significance of this is that this provides another reason for maximising the width and ecological quality of riparian corridors. Equally all new structures such as bridges will need to be designed to reduce the risk of otter mortality through road death and they are another target species for mitigation and enhancements such as introducing bankside cover and riverine habitat improvements.

LAND CONTAMINATION
This site has been subject to site investigation and risk assessment in 2011. At that preapplication stage we concluded that the site posed a low risk to controlled waters (i.e. groundwater and watercourses). This is due to the predominantly agricultural site history. (Please note that this does not preclude the need for remediation for the protection of human health which is within the remit of the local authority, and we recommend you consult with your Contaminated Land Officer on this.) There is however a small part of the site identified as an area of previous landfill. Since 2011 and the submission of this application, the landfill has been investigated further from a gas risk perspective. It is reported in RPS's contaminated land 'follow-up' letter that the landfill comprises a depression that was filled with builder's rubble. The risk to groundwater remains unknown however the material appears to be inert. We are satisfied with the principle of development from a land contamination perspective, and any residual risks this site may pose to controlled waters from both contaminated land and the landfill may be covered by the following condition:

Condition: If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted a remediation strategy to the Local Planning Authority detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be agreed in writing by the Local Planning Authority and implemented as approved.

Reason: To ensure the protection of controlled waters.

I trust this letter will assist with your determination of the development, as well as providing advice to the developer for the detailed planning stage. Please do not hesitate to contact us if there are any queries. A copy of the decision notice would be appreciated.

Land Drainage Officer
21st May 2014

I have reviewed the Flood Risk Assessment and Drainage Strategy submitted with this application. I am satisfied with its approach and concur with its recommendations and conclusions. I would also reiterate the comments made by the Environment Agency that all SuDS be designed in accordance with CIRIA guidance C697 - The SuDS Manual. From 1st April 2014, the Lead Local Flood Authority (Gloucestershire County Council), will be responsible for the approval, inspection and adoption of SuDS. I would anticipate their involvement in the approval of the final/detail drainage design.

6th June 2014

REVISED COMMENTS

I have reviewed the Flood Risk Assessment and Drainage Strategy submitted with this application. I am satisfied with its approach and concur with its recommendations and conclusions. I would also reiterate the comments made by the Environment Agency that all SuDS be designed in accordance with CIRIA guidance C697 - The SuDS Manual.

Defra has delayed the proposed October 2014 implementation of Schedule 3 of the Flood and Water Management Act 2010. In this respect, a further announcement is expected from Defra this summer. Upon the implementation of Schedule 3 of the Act, the Lead Local Flood Authority (Gloucestershire County Council), will be responsible for the approval, inspection and adoption of SuDS.

Gloucestershire COUNTY COUNCIL

Planning Application 13/01605/OUT

Land at Leckhampton, South West Cheltenham

Non-Technical Summary

Proposal

The proposal seeks outline planning consent for up to 650 houses and mixed uses, with access being determined as part of the outline application. The site is located to the south of Cheltenham town centre on the urban edge of Leckhampton and Warden Hill. The land now forms part of a draft allocation in the Joint Core Strategy (JCS), and in the Pre-Submission Joint Core Strategy - April 2014 for approximately 1125 houses and mixed uses.

Policy

In determining this application, the starting point will be the National Planning Policy Framework (NPPF), as the adopted local plan is out of date in regards to accommodating development post 2011. Due weight should be given to relevant policies in the Local Plan according to their degree of consistency with the NPPF, the closer the policies in the plan to the policies in the NPPF the greater the weight that may be given. The JCS has reached Pre-Submission stage, which forms a statutory stage of the plan preparation process. The policies in the JCS are now agreed by each of the authorities, and subject to soundness will carry forward to public examination. Polices therefore do have some weight.

Guidance

National Planning Practice Guidance, Guidance on Transport Assessments, Manual for Streets Manual for Gloucestershire Streets

Aim

The overarching aim of this assessment is ensure;

- Safe and suitable access to the site can be achieved for all people
- Opportunities for sustainable transport modes have been taken up to reduce the need for major transport infrastructure
- The residual cumulative impacts of the development are not severe.
- Improvements can be undertaken within the transport network that cost effectively limits the significant impacts of the development.

Trip Rates and Distribution

To estimate vehicle trips from a development the industry standard is to use TRICS. The validate this we asked the transport consultants to carry out a peak hour manual turning count at the local junction of Brizen Lane with Kidnappers Lane.

The vehicular trip distribution for the residential element of the development was determined by the SATURN model as agreed with GCC. The development of 650 houses and mixed uses are likely to generate the following vehicular trips;

Trips	Morning Peak Hour (08:00 – 09:00)			Evening Peak Hour (17:00 – 18:00)		
	Arr	Dep	2-way	Arr	Dep	2-way
Total Residential	**97**	**261**	**358**	**249**	**151**	**400**
Total Employment	**65**	**11**	**76**	**9**	**51**	**60**
Total	**162**	**272**	**434**	**258**	**202**	**460**

Strategic Modelling

GCC has a strategic transport model, SATURN, and has a protocol that developers use the model for strategic and large planning applications. The SATURN traffic modelling shows what happens if traffic travels along corridors of least resistance, and plots which routes that may be taken to avoid delays. The results shown that the optimum scenario, is not to restrict flows on Leckhampton Lane, but allow traffic flow to balance along the corridors in Shurdington, Up Hatherley and Leckhampton.

Local Transport Modelling

A Transport Assessment was submitted in support of the application, it is considered that the TA was broadly in accordance with the DfT's Guidance on Transport Assessment, additional guidance National Planning Practice Guidance (NPPG) was issued in March 2014.

Various scenarios have been tested both through strategic modelling and isolated junction modelling. The highway authority consider that the considering the wider network, and the importance of the bus frequency, that the Leckhampton Lane restriction works should not be implemented, but the Moorend signal improvements should be, and coupled with the area wide modal shift and trip banking, the residual cumulative impact of this development compared with future (2023) flows of the network, (which include back ground growth and other JCS developments which will be built out by 2023) will not be severe

In is inevitable that this development will increase the number of vehicle trips onto the network, primarily during the AM and PM peaks. The developer has sought to use containment, and travel pattern plans, to either reduce peak hour travel, or amend daily travel patterns to maximise the capacity of the highway corridors.

Congestion

The A46 experiences recurrent congestion, this is a regular occurrence such as peak hour congestion or regular events. 2 junctions (Moorend signals and A46/Leckhampton Lane) are noted to currently have capacity issues, and this development will add to the performance of these junctions. However the development is only required to mitigate its own impact, and not any existing capacity issues.

Some of the minor roads on to the A46 do experience queuing, and this would be expected onto any Primary/Principal road. But the highway authority prioritised the A46 flows, to be as unhindered as possible, especially to accommodate bus frequencies, and the sake of relatively small queue lengths on minor side roads.

Therefore the highway authority is satisfied that subject to the recommended conditions and contributions a safe a suitable access for all can be achieved, the cumulative impacts of the development are not severe, and the development will actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, to be made more sustainable

Accessibility

Whilst the site is located on the edge of existing development, it is within a range of destinations that can be accessed by walking, cycling and public transport. Its location is therefore consistent with national and local policy, and through area wide travel planning and modal shift, patterns of growth can be actively managed to make the fullest possible use of public transport, walking and cycling.

Vehicular Access

The proposed accesses are;

- Primary access from A46 a signal controlled junction Drawing 2186.09A
- Secondary junction from A46 a priority junction incorporating a bus lane on demand junction. Drawing 2186.17C
- A pedestrian/footway only link from the junction of Kidnappers Lane and Farm lane to a future internal road within the proposed development. Drawing2186.31
- The closure of the existing Kidnappers Lane/A46 priority junction. Drawing 2186.30
- New junctions onto Kidnappers Lane 2186.32 & 33
- Improvements (visibility) to the Farm Lane/Leckhampton Lane junction. Drawing 2186.40
- Merlin Way pedestrian linkage improvements.

Sustainable Development

The site is located thus that we can actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling. GCC has been extremely successful in delivering the DfT funded Local Sustainable Transport Fund in respect of;

- Personalised Travel Planning
- Workplace Travel Planning
- Bike it
- Website and Branding
- Bike Hub

The LSTF team is looking at further projects;

- Bus Maps
- Bus taster tickets
- Cycling and walking maps
- Learning Independence for Travel (LIFT) Training
- Cycle Strategy
- Market and communication

What this is aiming towards is Active Travel, as no matter what our mode of transport choice, all of us walk every day as part of our daily activities of living. Furthermore any of us can cycle (in principle) on pretty much any road or dedicated cycle path that we want to.

There is an irrefutable case that links walking and cycling with the health, wealth and wellbeing of the community and businesses in Gloucestershire. And this is recognised by some of our key employers, who consider coherent active travel routes to be vital to attracting and retaining good staff.

The highway authority recommends that this development should to contribute towards provide a South West Cheltenham Modal Shift Strategy through;

- Site Travel Plans
- Area-wide/corridor Work Place Travel planning
- Branding/website
- Social Media
- Marketing
- Bus Maps
- Bus Tickets/Smart cards
- Cycling and walking maps

The South West Cheltenham Modal Shift Strategy will allow GCC to expand on the work included in the LSTF to develop a real modal shift towards alternative modes, helping to reduce the impact of car borne trips, create healthy active travel, and boost economic growth. These objective align with the three dimensions of sustainable development in the NPPF

Mitigation

The applicant and the highway authority have prepared a package of mitigation that will deliver modal shift and improvements to capacity along key transport networks.

Severe

The NPPF states that;

Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

But what is severe? The dictionary has alternatives for severe; acute, very bad, serious, grave, critical, dire, drastic, grievous, extreme, dreadful, terrible, awful, frightful, appalling,

Obviously the use of the term severe has been to convey something very extreme, to ensure that authorities only prevent development on transport grounds in overwhelming conditions

In everyday language we use severe to identify something that rarely occurs and we should be aware, “severe weather” would be an example to describe flooding.

Perhaps we need to understand why the NPPF is using such terminology, in transport when previously it was “nil detriment” or “5%” increase”. Previously nil detriment, or only a 5% increase, resulted in refusals on transport grounds, or requiring very expensive infrastructure to resolve. Both of these solutions inevitable resulted in reduced delivery of housing, as developers could not deliver, as sites were unviable

To try and understand how you might calibrate severe in transport terms might be to look at how government pinch point funding is allocated. Pinch point funding seeks to remove bottlenecks on the local highway network which are impeding growth. The fund reflects the government’s commitment to supporting economic growth by tackling barriers on the local highway network that may be restricting the movement of goods and people. The fund is aimed at those schemes that can be delivered quickly with immediate impact.

No Pinch Point funding was sought for Shurdington Road, due to its relatively low ranking, strategically in Gloucestershire.

Conclusions

Gloucestershire County Council as the local highway authority has assessed this application in light of the National Planning Policy, the CBC local Plan, the emerging Joint Core Strategy, and other material considerations

The applicant has used the SATURN strategic model, and local junction modelling techniques to understand the wider impact and the local capacity issues.

The development is located to make the fullest possible use of public transport, walking and cycling, to be made more sustainable, and subject to the recommended conditions and contributions a safe a suitable access for all can be achieved, the cumulative impacts of the development are not severe.

Therefore the highway authority considers there that the development has some weight due to its draft allocation in the JCS Pre-Submission stage, and the site is located adjacent to the existing urban fringe of South West Cheltenham, and raises no highway objection.

Gloucestershire COUNTY COUNCIL

Planning Application 13/01605/OUT

Land at Leckhampton, South West Cheltenham

Highway Response June 2014



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Chapter 6 – Strategic Modelling

Chapter 7 – Mitigation

Chapter 8 – Reserved Matters

Chapter 9 – Conclusions

Chapter 10 – Conditions

Introduction and Bibliography

Gloucestershire County Council (GCC) as the highway authority is a statutory consultee to **Cheltenham Borough Council (CBC)** for this planning application

Highways Development Management (HDM) – A team within Gloucestershire County Council, (as the highway authority), that responds to planning applications as a statutory consultee.

Peter Evans Partnership (PEP) – Transport consultants appointed by the applicants

Joint Core Strategy (JCS) – A document for Gloucester City, Cheltenham Borough and Tewkesbury Borough to identify the need and location of employment and housing sites and associated infrastructure up to 2031

SKANSKA – Transport Consultants commissioned by CBC to prepare SATURN scenarios for the JCS

SATURN - **Simulation and Assignment of Traffic in Urban Road Networks**. A network analysis program developed at the Institute for Transport Studies, and distributed by WS Atkins. The model is owned by GCC, and is used for strategic network analysis. This model has been used to predict the traffic distribution based on a Gloucestershire strategic model and includes all permitted development and allocations. The use of SATURN, for the traffic modelling work is consistent with both best practice and current government advice. SATURN is recognised by the Department for Transport (DfT) as an appropriate technique for traffic modelling and scheme assessment and has been used for many years by consultants and local authorities as one of the 'industry standard' modelling tools.

TRICS - Trip Rate Information Computer System

TEMPRO - Trip End Model Programme

PCU PASSENGER CAR UNITS PCU's are frequently used in traffic assessment work and are based on the principal of translating all vehicles into one common traffic 'currency' this is achieved by apportioning different PCU values to different types of traffic. Typical values are given in below:

Vehicle Type	PCU Value
Car	1.0
Light Goods Vehicle	1.0
Rigid Goods Vehicle	1.9
Articulated Goods Vehicle	2.9
Public Service Vehicle	2.5

ARCADY – Assessment of Roundabout Capacity and Delay, Transport Research Laboratory (TRL)

PICADY – Priority Intersection CApacity and DelaY, Transport Research Laboratory (TRL)

LINSIG - computer software package for the assessment and design of traffic signal junctions

MOVA – Microprocessor Optimisation Vehicle Actuation. A control system for traffic light signals at isolated junctions. It intelligently switches between delay-minimising and capacity-maximising modes, depending on traffic demand.

Chapter 1

The Proposal

Proposal

The proposal seeks outline planning consent for up to 650 houses and mixed uses, with access being determined as part of the outline application. For clarity, access for this application has been defined by the local planning authority as, the principal new junctions to the site from the A46 and the connections to the public highway at Kidnappers Lane. The application has a red line which encompasses the 650 houses and mixed uses, although a masterplan demonstrates how 1200 houses and mixed uses could be accommodated.

Site Location

The site is located to the south west of Cheltenham and immediately south of the built up residential area of Moorend. The site is predominately bounded by two arterial roads, Shurdington Road, part of the Primary Road network A46 to the west, and Leckhampton Lane/Church Road to the east. The A46 links the A417 to Cheltenham, and is one of the principal movement corridors in to the town centre.

Existing Highway Network

The site is located to the south of Cheltenham town centre on the urban edge of Leckhampton and Warden Hill, although a small residential development finger exists, along part of Kidnappers Lane, of approximately 140 dwellings.

The A46 Shurdington Road is an arterial corridor which continues directly into Cheltenham town centre. The Average 24 hour Workday Flows are circa 8150. The Stagecoach 10 Goldrider service operates a predominately 10 minute frequency, with the Stagecoach 46 service operating a predominately hourly service, along the A46, some with dedicated RTPI bus stops. Shurdington Road has segregated footways, and the carriageway is suitable for on street cycling, (although according to the CBC cycle map, a level of experience is required - level 4 of 5). Shurdington Road is predominantly a 7.3 m wide road subject to a 40mph, speed limit.

Leckhampton Lane is as single carriageway classified road that links the A46, from a priority junction at the Bell Inn, to Church Road that continues on to Leckhampton Road, in Leckhampton. Leckhampton Lane is subject a 60mph speed limit, apart from the initial section from the Shurdington Road, and the approach to the connection to Church Road, which occurs at a cross road junction, locally known as the Crippetts Lane crossroads. Kidnappers Lane is located to the south of the application site and also meanders through the site, linking with Church Road to the east. Farm Lane connects Kidnappers Lane to Crippetts Lane crossroads.

The A46 links to the strategic road network, the A417 and then to junction 11a of the M5 giving direct access to the M5 South, and indirectly to the M5 north. The South East can be accessed via the A417 /A419 to Swindon and the M4

Planning History

The application site for 650 houses currently has no policy allocation or designation in the CBC local plan and is referred to as white land. In 2006 the area was included in Regional Spatial Strategy (RSS) as part of wider area of search; however the RSS was revoked in 2010. The land now forms part of a draft allocation in the Joint Core Strategy (JCS), and in the Pre-Submission Joint Core Strategy - April 2014 for approximately 1125 houses and mixed uses.

Chapter Summary

The proposal seeks outline planning consent for up to 650 houses and mixed uses, with access being determined as part of the outline application. The site is located to the south of Cheltenham town centre on the urban edge of Leckhampton and Warden Hill. The land now forms part of a draft allocation in the Joint Core Strategy (JCS), and in the Pre-Submission Joint Core Strategy - April 2014 for approximately 1125 houses and mixed uses.

Chapter 2

Policy and Guidance

Policy

In determining this application, the starting point will be the National Planning Policy Framework (NPPF), as the adopted local plan is out of date in regards to accommodating development post 2011. Due weight should be given to relevant policies in the Local Plan according to their degree of consistency with the NPPF, the closer the policies in the plan to the policies in the NPPF the greater the weight that may be given.

The National Planning Policy Framework March 2012

The primary transport considerations of the NPPF are;

All developments that generate significant amounts of movement should be supported by a Transport Statement or Assessment. Plans and decisions should take account of whether:

- The opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- Safe and suitable access to the site can be achieved for all people; and
- Improvements can be undertaken within the transport network that cost effectively limits the significant impacts of the development. Development should only be prevented or refused where the residual cumulative impacts of the development are severe.

Furthermore it is a core policy of the NPPF that the opportunities for sustainable transport have been taken up, safe and suitable access for all is provided, and residual cumulative impact of the development.

Finally the NPPF states where the development plan is absent, silent or relevant policies are out-of-date, grant permission unless;

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.

Cheltenham Borough Local Plan 2006, (CBCLP), - Principal transport policy

TP 1 Development and highway safety

Development will not be permitted where it would endanger highway safety, directly or indirectly, by:

(a) creating a new access, altering an access or increasing the use of an existing access on to the main highway network, or at other points where it would be hazardous to highway users, unless a satisfactory improvement has been carried out; or

(b) generating high turnover on-street parking.

Pre-Submission Joint Core Strategy - April 2014

The JCS has reached Pre-Submission stage, which forms a statutory stage of the plan preparation process. The policies in the JCS are now agreed by each of the authorities, and subject to soundness will carry forward to public examination. Polices therefore do have some weight.

Guidance

National Planning Practice Guidance (NPPG) - CLG

Guidance on Transport Assessments (GTA) - CLG/DfT

Manual for Streets (MfS)- CLG/DfT

Manual for Gloucestershire Streets (MfGS) – GCC

Chapter Summary

In determining this application, the starting point will be the National Planning Policy Framework (NPPF). Due weight should be given to relevant policies in the Local Plan according to their degree of consistency with the NPPF, the closer the policies in the plan to the policies in the NPPF the greater the weight that may be given. The emerging JCS will provide the strategic context, however with limited weight due to the stage of its preparation. National and local guidance are material considerations in determining this application

Chapter 3

Trip Rates and Distribution

Pre-application Scoping

As is standard practice the transport consultants for the applicant Peter Evans Partnership (PEP) and Gloucestershire County Council Highways Development Management (HDM), entered into early discussions to scope the required assessment and modelling of a strategic application of this size. Originally the application was for 1200 dwellings, and included land south of Farm Lane, within the administration boundary of Tewkesbury Borough Council (TBC). This additional piece of land is allocated in the Tewkesbury Borough Council Local Plan 2006 – 2011 as policy SD2.

GCC has a strategic transport model, SATURN, and has a protocol that developers use the model for strategic and large planning applications. The site is located well within the Central Severn Vale SATURN model and therefore can predict strategic traffic flows across a wide area, to understand future traffic movements and help to assess strategic mitigation, if impact occurs. The model cannot assess individual junction capacity, and therefore isolated junction modelling would be needed to understand if junctions would be over capacity, to determine if mitigation is required and feasible.

Part way through these pre-application discussions land owners of the land south of Farm Lane made the decision to withdraw from the pre-application discussions, and this left the application reduced to 650 dwellings with mixed uses.

The original scope for the SATURN modelling resulted in a slight disagreement with PEP, who wanted to test Do Something scenarios that included build outs of houses on as yet unpermitted and unallocated sites. The Department of Transport document Guidance on Transport Assessments states;

"The assessment years should consider person trips from all committed developments that would impact significantly on the transport network, particularly where they substantially overlap, such as at the same junctions and/or on roads as the proposed development. The committed developments will typically include development sites that have extant planning permission as well as development plan allocations in an adopted or approved plan"

Developments that have been completed but not fully occupied should be included in these assessments. The inclusion or exclusion of committed developments in the assessments should be agreed with the relevant authorities at the pre-application stage.

On 6 March 2014 the Department for Communities and Local Government (DCLG) launched the National Planning Policy Guidance, and committed development is clearly defined as;

"Development that is consented or allocated where there is a reasonable degree of certainty will proceed within the next three years)"

Cheltenham Borough Council views are that despite the limited weight of the JCS, both members and the local community are very concerned about the impact of the proposed development and the potential transport implications arising. Considering the proposed scheme therefore only in the context of committed development would not address these concerns. Therefore CBC required a better understanding of the potential cumulative impacts of developments proposed by the JCS in order to provide the appropriate advice and support to Planning Committee in making a decision on the application.

CBC suggested that GCC should consider the application in line with DfT guidance, taking into account committed sites, but within the wider context of JCS strategic transport modelling. This modelling will provide an overview of the cumulative impact of the spatial strategy of the JCS, taking into account relevant mitigation measures. The JCS commissioned SATURN scenarios remain ongoing with the process of the JCS.

CBC felt that this is a pragmatic approach to providing GCC with a robust position in the context of DfT guidelines, whilst providing the wider strategic analysis sought by Cheltenham Borough Council. .

PEP wanted to include specific development sites and build out rates that aligned with some very draft allocation sites; however GCC suggested only included committed developments and growth basest on housing demand to 2031.

The developments that formed part of the PEP Do Something (DS) scenarios are detailed and discussed in Chapter 6, including a comparison of the GCC suggested scope.

When the Farm Lane developer withdrew from the pre-application discussions, PEP commissioned further SATURN scenarios, to reflect the impact of 650 dwellings.

Detailed discussion on the application SATURN modelling and the JCS SATURN modelling can be found in Chapter 6.

Vehicle Trips

To estimate vehicle trips from a development the industry standard is to use TRICS. To validate this TRICS trip rate, GCC asked the transport consultants to carry out a peak hour manual turning count at the local junction of, Brizen Lane with Kidnappers Lane. This sensitivity test validated the trip rate.

The Transport Assessment used the following mix for trip generation;

- up to 650 dwellings;
- a primary school;
- a GP surgery;
- a local convenience store and small retail unit; and
- 4 500 sq m of either one or more of the following - B1 employment, care home, dentist, children's nursery, cottage hospital, other Class A uses.

This results in total traffic for each element as shown in the table below

Trips	Morning Peak Hour (08:00 – 09:00)			Evening Peak Hour (17:00 – 18:00)		
	Arrival	Departure	**2-way**	Arrival	Departure	**2-way**
Privately owned housing	74	210	284	198	116	314
Privately owned affordable housing	13	32	45	31	20	51
Rented affordable housing	10	19	29	20	15	35
Total Residential	**97**	**261**	**358**	**249**	**151**	**400**
Total Employment	**65**	**11**	**76**	**9**	**51**	**60**
Total	**162**	**272**	**434**	**258**	**202**	**460**

This indicates that there would be around 434 two-way vehicle trips arising from the development in the morning peak hour and around 460 two-way vehicle trips in the evening peak hour.

Distribution

The vehicular trip distribution for the residential element of the development was determined by the SATURN model as agreed with GCC. It was assumed that the vehicle distribution for the residents at Leckhampton would be similar to the nearby residential zones within the SATURN model.

During the modelling scoping process it was agreed to use zones 308, 361, and 450 for the morning peak hour residential distribution and 308 and 361 in the evening peak hour, as these zones area adjacent to the proposed Leckhampton site. The distribution for the existing residential zones, within the model, were determined from road side interview surveys undertaken by GCC in 2003, and 2008 and calibrated using traffic count data.

As part of the TA various development scenarios have been modelled using SATURN. The methodology and results of the SATURN modelling are discussed in Chapter 6

Chapter Summary

The development is assumed to generate the following vehicle trips in 2023, and results in the projected trip and distribution as shown in the diagrams below, (Blue Text). The diagrams also shows the comparison of existing flows in 2023 without the application site (Red Text), and 2023 with the application site, and the Leckhampton Lane restriction (Green Text). For base comparison the 2012 surveyed flows are shown (Black Text)

AM and PM Predicted Flow Diagrams

1. **AM Peak hour flows (08:00 – 09:00) CSV SATURN**

2. **PM Peak hour flows (08:00 – 09:00) CSV SATURN**

Chapter 4

Accessibility and Access

Accessibility

The A46 is primarily served by the bus services 10, operating a 10 minute frequency past the application site. The application proposal of 650 houses and mixed uses would have access to this and other bus services, and also there are range facilities in Warden Hill and Leckhampton that are accessible by walking and cycling.

According to the 2011 Census data (Office for National Statistics), Cheltenham has a lower than average car/van mode share, attributable to the higher usage of active modes. Travel to work by other modes, are the highest in the county, and outperform the country averages, with 18% on foot and 56% in car/van, and with 71.1% containment.

Current guidance on walking distances to bus stops and facilities are contained with Manual for Streets (MfS) and Institute of Highways and Transportation (IHIT) national guidance. Manual for Streets (ref: Section B paragraph 4.4.1) states walkable neighbourhoods are typically characterised by having facilities within a walking range of 10 minutes (approx 800m), although this should not be considered as an upper limit.

For pedestrians without mobility impairment, the Institution of Highways and Transportation (IHT) in their publication, 'Guidelines for Providing for Journeys on Foot 2000' make a series of suggested acceptable walking distances in relation to some common facilities, see table below;

Suggested Acceptable Walking Distances			
	Town Centres, Retail	Employment/school/tourism	Elsewhere
Desirable	200m	500m	400m
Acceptable	400m	1000m	800m
Preferred Maximum	800m	2000m	1200m

NPPF states at paragraph 28 that *'The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel'*. It is worth dwelling on this statement, as the NPPF is not just asking to consider sustainable transport modes, but be balanced **in favour.**

ONS data on commuting patterns collected from the Annual Population Survey (2010 and 2011) indicate a high proportion of people both living and working within the JCS area. This self containment highlights the potential for short-distance trips to transfer where appropriate, to non-car modes, such as public transport, walking or cycling

It is a core policy in the NPPF that in decision making, development should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, to be made sustainable. It is a key thrust of the NPPF to create new multi modal links and ensure they remain sustainable in the long term.

Whilst the site is located on the edge of existing development, it is within a range of destinations that can be accessed by walking, cycling and public transport. Its location is therefore consistent with national and local policy, make the fullest possible use of public transport, walking and cycling, to be made sustainable.

Vehicular Access

The proposed site accesses are being dealt with by this outline planning application. These accesses are;

- Primary access from A46 a signal controlled junction Drawing 2186.09A
- Secondary junction from A46 a priority junction incorporating a bus lane on demand junction. Drawing 2186.17C
- A pedestrian/footway only link from the junction of Kidnappers Lane and Farm lane to a future internal road within the proposed development. Drawing2186.31
- The closure of the existing Kidnappers Lane/A46 priority junction. Drawing 2186.30
- New junctions onto Kidnappers Lane 2186.32 & 33
- Improvements (visibility) to the Farm Lane/Leckhampton Lane junction. Drawing 2186.40
- Merlin Way pedestrian linkage improvements.

Junctions and Links

Primary access from A46

This primary access is a signal controlled junction, which interalia replaces the existing Kidnappers Lane junction and removes the signal controlled crossing; replacing it with an uncontrolled crossing facility. This junction will allow the existing Chelteham bound bus services and diverted bus service to have priority access into the development.

Secondary Access from A46

This is a priority junction which acts as the access to a proposed boulevard layout. Whist secondary in highway terms, it can be considered as the main access to the development. Coupled with the priority junction is an on demand signal controlled bus lane which gives priority to buses travelling to Cheltenham, this will be called approximately every 10 minutes.

Pedestrian/footway only link from the junction of Kidnappers Lane and Farm lane

This section of Kidnappers Lane will be stopped up to vehicular traffic, allowing it to be a permeable link for pedestrians and cycles. This would have the added benefit of removing Kidnappers Lane, which is a single width rural road in this location, as a well established “rat run”.

Junctions on to Kidnappers Lane

2 new junctions are proposed onto Kidnappers Lane, this will enhance the internal layout provide improved multimodal permeability, and also reduced the previously mentioned rat running.

Existing Kidnappers Lane/A46 priority junction, (closure)

This closure is required to enable the Primary access to have the required visibility, and design standards, it will also rationalise the junction street furniture at this section and create a more legible junction. Access by pedestrians and cycles will be retained as will access from within the internal layout.

Farm Lane/Leckhampton Lane junction, (visibility improvements).

The egress visibility from Farm Lane onto Church Road /Leckhampton Lane junction is substandard and whilst the scheme and internal layout is designed to limit trips in this direction, there may be some insignificant increase, but it is deemed necessary to create a safe and suitable access.

Leckhampton Lane traffic demand management works

During the pre-application discussions and during the formal consultation period the highway authority and PEP proposed measures to control the anticipated vehicular demand on Leckhampton lane as a result of the proposal. Various options were developed during this period, all with the same intention to manage the demand. A scheme of priority build outs is suggested, which both increases journey time through this section, and reduces speed, along this rural section. The option was presented at public consultations and events by the applicant and PEP, but it is understood it did not receive local support.

The scheme would need clear signing of priorities and the intervisibility between opposing flows will also be critical to avoid conflicts between opposing flows. The length of the one-way working needs to be optimised to ensure that extended platoons of vehicles in one direction do not cause driver frustration and cause miss use of the layout. This scheme was specifically tested in a do something SATURN scenario, and is discussed at Chapter 6.

Church Road Measures

Measures are proposed to traffic calm the junction of Church Road with Hall Road. This location is known locally as Leckhampton village, and local concerns have been raised about any increase in through traffic from the development, and any further re-distributed traffic onto Leckhampton Lane and onto Church Road.

The measures are proposed to reduce speeds by installing build outs and create a friendlier space, for pedestrians especially given the location of the existing primary school. The width of the remaining gap needs to be designed to ensure that users aren't indecisive and could lead to conflicts as opposing vehicles try to squeeze through the gap. A "gateway" feature is also proposed past the church on Church Road. The intention is to reduce speeds on the approach to the built up area on Church Road.

The works would be subject to public consultation and may need to be incorporated into area wide corridor based scheme if the anticipated housing number in the JCS comes forward.

Moorend Signals

This signal controlled junction can be seen to be a pinch point along the Shurdington Road network and is constrained in width and lane capacity. Probably the most strained arm is the approach to the junction on the Shurdington Road, travelling towards Cheltenham. The carriageway provides a straight on and left turn lane, plus a right turn lane. The right turn lane can take time to clear due to the oncoming lanes this can then block the taper into the straight on and left

The existing layout can be seen in the drawing overleaf.

GCC has proposed that as the junction is showing to be over capacity, that mitigation is required, and has proposed to create some additional capacity during the morning peaks to reduce congestion. The proposal can be seen overleaf which increases the number of inbound lanes to 3.

The applicant is not offering this improvement as part of the application but GCC believes that this mitigation is required is discussed further at Chapter 6

Chapter Summary

The site is located thus that we can actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling. GCC has been extremely successful in delivering the DfT funded Local Sustainable Transport Fund in respect of;

- Personalised Travel Planning
- Workplace Travel Planning
- Bike it
- Website and Branding
- Bike Hub

The LSTF team is looking and further projects;

- Bus Maps
- Bus taster tickets
- Cycling and walking maps
- Learning Independence for Travel (LIFT) Training
- Cycle Strategy
- Market and communication

What this is aiming towards is Active Travel, as no matter what our mode of transport choice, all of us walk every day as part of our daily activities of living. Furthermore any of us can cycle (in principle) on pretty much any road or dedicated cycle path that we want to.

There is an irrefutable case that links walking and cycling with the health, wealth and wellbeing of the community and businesses in Gloucestershire. And this is recognised by some of our key employers, who consider coherent active travel routes to be vital to attracting and retaining good staff.

The highway authority recommends that this development should to contribute towards provide a South West Cheltenham Modal Shift Strategy through;

- Site Travel Plans
- Area-wide/corridor Work Place Travel planning
- Branding/website
- Social Media
- Marketing
- Bus Maps
- Bus Tickets/Smart cards
- Cycling and walking maps

The South West Cheltenham Modal Shift Strategy will allow GCC to expand on the work included in the LSTF to develop a real modal shift towards alternative modes, helping to reduce the impact of car borne trips, create healthy active travel, and boost economic growth. These objective align with the three dimensions of sustainable development in the NPPF

Contributions:

South West Cheltenham modal shift strategy based on (Work Place Travel Plans): £400,000
Residential Travel Plan: £118,000
Non-Residential Development TPC budget: £18,000
Public Transport Contribution, Diversion of service J/K £385,000

Total £536,000

Chapter 5

Local Transport Modelling and Impact

Local Transport Modelling

A Transport Assessment (TA),dated September 2013, was submitted in support of the application, it is considered that the TA was broadly in accordance with the DfT's Guidance on Transport Assessment (GTA), which was the prevailing guidance at the application date, although it should be noted that additional guidance National Planning Practice Guidance (NPPG) was issued in March 2014. This guidance builds on the evidence with the GTA, to make guidance contemporary with the NPPF.

The TA was submitted to examine the impact of the site masterplan area, 1200 units, employment, primary school and other ancillary units. The scope of the TA was agreed between Peter Evans Partnership (PEP), Gloucestershire County Council (GCC) and the Highways Agency (HA). It was necessary to for all parties to agree to the areas which would be likely to be impacted by the development proposal, this was done via local traffic counts, discussions with stakeholders and knowledge of local issues. Traffic analysis was therefore undertaken within the agreed study area on the basis of expected changes in traffic movements across the local highway network. Whilst the TA assessed the impact of the total masterplan area of 1200 dwellings, a Supplementary Traffic Note was submitted in January 2014 to assess the impact of the 650 dwelling application site, together with highway mitigation works on Leckhampton Lane. An Addendum to the TA was submitted in December 2013 to respond to issues (bus capacity, non motorised users and schools) raised by GCC in response to the TA.

Future Year Assessment

The horizon year, this being the future year necessary to assess the impact of the development was agreed to be 2023. This represents 10 years after the date of the registration of the planning application, in accordance with the aforementioned DfT guidance. This also coincides with the anticipated development completion date.

Modelling Process

Traffic surveys undertaken in 2011 were utilised by PEP to assess the base year situation at each junction to be assessed. GCC's Central Severn Vale SATURN model produced strategic forecasts of link and junction flows, outputs from the SATURN model were extracted and utilised with the local junction modelling, this included turning movements at each of the junctions in the 2023 forecast year. Capacity analysis of the relevant junctions in the morning and evening peak hours was undertaken on an individual basis so free flow conditions on adjoining links has been assumed for junction capacity testing purposes. The industry standard software ARCADY, PICADY and LINSIG were used to assess roundabout, priority junctions and signals respectively. Base models were validated against observed queues, to ensure that the modelling represented a realistic base scenario with which to assess the future year scenario.

Committed Development

The DfT Guidance on Transport Assessments (GTA) stated that future year assessments should only include the development proposals and any committed developments, it defined committed development as sites with planning permission or sites included with an adopted development plan. This approach is consistent with the recently published Planning Practice Guidance. Although this is considered to be the correct approach in order to ensure certainty of assessment, Cheltenham Borough Council considered that the draft Joint Core Strategy (JCS) proposals should be included within any future year modelling scenario. GCC therefore accepted Cheltenham Borough Council's position and progressed with the modelling on this basis. It can be seen how this approach can be create uncertainty, as since the modelling was undertaken with PEP changes, changes to draft JCS have been made, with the removal of the Up Hatherley site and amendments to housing numbers. The removal of the Up Hatherley site would not adversely impact the modelling, as the site would be unlikely to be built out by 2023, however this is not to say that further changes to the draft JCS will not impact the modelling.

The 2023 land use forecasts took account of existing planning permissions which have not yet been implemented, sites allocated in Adopted Local Plans and development resulting from those sites within the draft JCS which may be built out by 2023. The JCS site information was extracted from the JCS document titled 'Developing the Preferred Options' consultation document.

Trip Generation

Trip rates for the 1200 units together with the employment, primary school and ancillary uses were derived from the Trip Rate Information Computer System (TRICS), this is a national traffic survey database. The assumed trip rates do not take account of any reductions in trips resulting from the residential travel planning, improvements to public transport provision and reduction in trips from the existing highway network as part of the area wide work place travel planning. It is therefore considered that the modelling represents an overly robust assessment.

Supplementary Traffic Note Trip Rates

As stated above, the original TA considered the impact of the Leckhampton masterplan area, this was required for Environmental Impact Assessment purposes, the supplementary traffic note considered solely the impact of the application site, together with the committed developments and JCS sites previously discussed, these committed developments include the 360 dwellings allocated in the Tewkesbury Borough Local Plan at Farm Lane. The trips remain the same as the TA:

Trips	Morning Peak Hour (08:00 – 09:00)			Evening Peak Hour (17:00 – 18:00)		
	Arr	Dep	2-way	Arr	Dep	2-way
Privately owned housing	74	210	284	198	116	314
Privately owned affordable housing	13	32	45	31	20	51
Rented affordable housing	10	19	29	20	15	35
Total Residential	**97**	**261**	**358**	**249**	**151**	**400**
Primary School	64	44	108	4	7	11
GP Surgery	13	6	108	8	10	11
Local Retail Centre	21	20	19	22	21	18
B1 Office	54	7	41	5	42	43

Some of the journeys undertaken to the individual uses on site will have travelled to or from other uses on the site. Some residents of the proposed dwellings will travel to the primary school, use the local shops, GP surgery or possibly work at the commercial use. Likewise, some people working at the commercial use would visit the local centre.

Therefore the total number of vehicles generated by the proposal would be less than the summation of the individual figures identified. The traffic assessment makes the following assumptions and the resulting trips used for the CSV modelling.

Primary School

All trips associated with the primary school would either be internal to the wider Leckhampton masterplan area and would therefore not use the external road network, or would be linked with residents dropping children off as part of their existing journey. These trips have therefore been included in the residential element of the traffic forecasts and have been removed from the analysis to avoid double counting.

GP Surgery

The patient catchment area of the GP surgery would be the wider Leckhampton masterplan area and therefore no patient trips would be on the external road network. The majority of trips have therefore been removed from the analysis.

During the peak hours some trips to and from the GP Surgery would be staff. Some 50% of the morning peak hour arrivals and evening peak hour departures are anticipated to be staff. The remaining trips would be patients. The staff trips are included in the employment trips for the purpose of the traffic modelling.

Local Retail Centre

The majority of the retail trips would be on the network in any event. This includes linked trips from the residential and employment areas of the development. A small proportion of the trips to and from the retail units would be new. It has been agreed that 20% of trips would be new to the external network. These have been added to the employment trips for the purpose of the traffic modelling.

Total Traffic

The trip generation that has therefore been used to input to the Central Severn Vale modelling is as follows:

Trips	Morning Peak Hour (08:00 – 09:00)			Evening Peak Hour (17:00 – 18:00)		
	Arr	Dep	2-way	Arr	Dep	2-way
Privately owned housing	74	210	284	198	116	314
Privately owned affordable housing	13	32	45	31	20	51
Rented affordable housing	10	19	29	20	15	35
Total Residential	**97**	**261**	**358**	**249**	**151**	**400**
Total Employment	**65**	**11**	**76**	**9**	**51**	**60**
Total	**162**	**272**	**434**	**258**	**202**	**460**

This indicates that there would be 434 two-way vehicle trips arising from the development in the morning peak hour and 460 two-way vehicle trips in the evening peak hour.

Traffic Distribution

Traffic has been distributed and assigned to the network using the information extracted from SATURN. It was assumed that the vehicle distribution for residents at Leckhampton would be similar to the nearby residential zones with the SATURN model. Trips from the proposed residential element of the application are distributed using traffic count and turning movements from nearby existing residential estates, these are known as SATURN zones. The distribution for the existing

residential zones within the model were determined from road side interview surveys undertaken by GCC in 2003 and 2008 as part of the model update, this was validated using traffic count data.

The trip distribution for the employment element of the development was derived from the 2001 census travel to work data. The home locations of the employees working in the Leckhampton ward in 2001 were reviewed, based on the home locations of employees a distribution across the local road network was determined.

Existing conditions

A46 Shurdington Road/Leckhampton Lane Priority Junction

The 2011 base modelling demonstrates that this junction is already over capacity in the morning and evening peak hours. The modelling demonstrates that there are maximum queues along Leckhampton Lane in the AM peak of 16 passenger car units (PCU's) and maximum queues of 97 PCU's for the right turn movement into Leckhampton Lane from the A46. In the PM peak these queues reduce to 9 and 58 PCU's respectively.

The likely reason for the reduction in queues from the AM to the PM peak is due to peak spreading, this is where the PM peak is generally considered to take place over a longer period of time, whereas the AM peak is constrained to a shorter amount of time. The A46 in both peaks is generally slow moving traffic, rather than actual queues (nose to tail vehicles not moving for long periods of time), there PICADY struggles to model the junction effectively and therefore over estimates the queues.

From site visits and video footage of the junction drivers travelling westbound slow down, in order to allow the right turn movement into Leckhampton Lane to take place, PICADY is unable to replicate this behaviour, and therefore overestimates the queuing.

It is important to assess the surveyed queue data for junctions; this helps to determine the validity of the base model and also provides additional information where the modelling software is not able to accurately predict the capacity of a junction due to driver behaviour. The surveyed queue data demonstrated that the maximum queue in the morning peak hour is 20 vehicles on the Gloucester approach, with maximum queues of 8 vehicles for the Cheltenham approach. Maximum queues on Leckhampton Lane were around 8 vehicles. It should be noted that in transport planning terms a queue is considered to be stationary vehicles, as opposed to slow moving traffic.

A46 Shurdington Road/Up Hatherley Way Roundabout

The ARCADY modelling indicates that the average maximum queues during the AM and PM peaks in the 2011 base year are up to 3 PCU's with a maximum queue during the AM peak hour of 8 PCU's for vehicles travelling towards Cheltenham and 6 PCU's for PCU's travelling towards Gloucester. The maximum queue that occurs during the PM peak is 12 PCU's travelling into Cheltenham and 5 PCU's travelling out of Cheltenham. The maximum queue is known as the 95% queue; this queue can be described as the peak of the peak and will only occur once during the peak.

The queue surveys for this junction are lower than those predicted by the base ARCADY model, however it is considered that base model represents a broadly similar scenario to the existing situation on the ground.

A46 Shurdington Road/Kidnappers Lane Priority Junction

The 2011 base modelling indicates that queues at this junction (onto the A46) are negligible in both the AM and PM peak periods.

The base modelling is comparable to the surveyed queues, with relatively minor stationary queues along the A46; however the surveys do indicate that vehicles can struggle to turn right into Kidnappers Lane, with queues of up to 20 vehicles for the right turn movement.

A46 Shurdington Road/Woodlands Road Priority Junction

The 2011 base modelling indicates that queues at this junction (onto the A46) are negligible in both the AM and PM peak periods.

The surveyed queues are similar to the base modelling queues in relation to Woodlands Road and the A46 Gloucester approach; however the surveys estimate queues of up to 25 vehicles on the A46 Cheltenham approach, this peak within the peak lasts for approximately 20 minutes between 8.25 and 08.45. The PM peak shows queues of up to 16 vehicles on the A46 Cheltenham approach, but only for around 10 minutes at 17.50. The reason for the inconsistency between the base modelling and the surveyed data is that the modelling cannot mimic driver behaviour, at this location vehicles travelling along the A46 stop to allow vehicles to enter and exit Woodlands Road, which forms the queuing, however the model assumes a free flow of traffic. This is discussed in more detail in the future year modelling section.

A46 Shurdington Road/Moorend Park Road Signalised Junction

The 2011 base modelling demonstrates that the junction is operating within capacity in the AM and PM peak periods. Mean maximum queues on all arms in the AM peaks are between 15 and 17 PCU's with a average maximum queue of 32 PCU's eastbound along the A46. Queues in the PM peak are between 12 and 30 PCU's, with 30 PCU's eastbound and 26 PCU's queuing westbound.

The surveyed queues are generally consistent with the base modelling, with the largest queues on the A46 Cheltenham approach in both the AM and PM peak hours. There is generally queuing vehicles on all arms, with average queues on the A46 Gloucester approach in the region of 8-12 vehicles across the peak hour. The surveys demonstrate that the queuing in the nearside lane of the A46 Cheltenham approach reaches a maximum of 14 vehicles across both peak hours, whilst the right turn lane can queue back as far as 45 vehicles, with the average during the peak hours being around 30 vehicles. It is difficult to know exactly how the survey company distinguished these queues as the right turn lane is not capable of accommodating this level of vehicles, therefore the data should show a maximum queue commensurate with the capacity of the right turn lane and a

queue in lane 1 incorporating vehicles travelling ahead and vehicles turning right who are waiting in lane one. In any event, the base modelling and the surveys demonstrate that there is existing queuing at this junction.

A46 Shurdington Road/Leckhampton Road/Norwood Road Roundabout

This junction is shown to operate within capacity in all scenarios in the 2011 base year. Maximum average queues are around 2-3 vehicles, with the maximum queue at any time during the peak hour being up to 8 PCU's in the AM peak hour on the A46 east arm of the junction. The maximum queue during the PM peak is 8 PCU's on the A46 east arm.

The surveyed queues in the morning peak hour are generally comparable to the base modelling results, although queues on Leckhampton Road can reach 18 vehicles, but only over a 10 minute period. The surveyed queues do not compare well to the base model in the PM peak with queues on Leckhampton Road of between 11 and 27 vehicles from 18:00-18:15, however queues in the 'traditional' peak hour are comparable to the base model on all approaches with the exception of Norwood Road. There is a single spike on 18 vehicles queuing for 5 minutes at 17:35 on Leckhampton Road. Queues on Shurdington Road and Norwood Road increase sharply at around 15:50 for a 5 minute period, whilst queues on Shurdington Road have a number of peaks within the peak, which last around 5 minutes. Queues on Norwood Road reach up to 22 vehicles with a peak spread between 16:55 and 17:20, this is due largely to the high flows along the A46, which results in vehicles struggling to egress Norwood Road.

Leckhampton Road Double Mini Roundabout

The modelling demonstrates that during the 2011 base year that this junction is generally operating within capacity, except on a single arm in each peak hour. During the AM peak hour the Leckhampton Road south arm (mini roundabout with Charlton Lane), shows a maximum queue of 14 PCU's. During the PM peak hour the Leckhampton Road north arm (mini roundabout with Church Road) shows a queue of 10 PCU's.

Queues are comparable with the base modelling in all scenarios, with the only anomaly being a spike of 16 vehicles queuing in the PM peak at 15:30 on the Leckhampton Road approach to Charlton Lane.

2023 Modelling

As stated above 2023 is the future assessment year of the development, the results of 2023 modelling for the application site, 650 units plus employment and ancillary uses are presented within the Supplementary Traffic Note. The future year modelling assesses the impact of the development when it is expected to be fully built out and occupied, the future year assessment also includes traffic from the 360 dwelling Tewkesbury Local Plan allocation at Farm lane, any other sites with planning permission and allocated in an adopted Local Plan and traffic resulting from the draft

JCS proposals, most notably 1500 houses at Brockworth and the anticipated build out of that site, however this does not include the allocation at Up Hatherley which has recently been removed.

Each junction was tested for capacity in the 2023 design year with and without the application development. A sensitivity test was also undertaken to determine the impact on the local highway network by restricting the amount of traffic turning into Leckhampton Lane from the A46. It is known that right turning traffic blocks ahead on traffic at this junction and that vehicles travelling out of Cheltenham slow down to allow drivers to exit Leckhampton Lane and drivers to turn right into Leckhampton Lane. The sensitivity test considered that impact of traffic calming measures along Leckhampton Lane; this would discourage traffic from using Leckhampton Lane and therefore reduce flows. In attempting to resolve the issue of the Leckhampton Lane junction it is accepted that this will assign more traffic to the A46. Results for all junctions will be presented with and without the Leckhampton Lane capacity restriction for clarity.

A46 Shurdington Road/Leckhampton Lane Priority Junction

The Leckhampton Lane junction was tested with no mitigation measures and with a capacity limit of 300 PCU's two way on Leckhampton Lane. The AM peak 2023 scenario without development demonstrates that maximum average queues on Leckhampton Lane will be 45 PCU's with queues of 156 PCU's travelling eastbound into Cheltenham. It should be noted that PICADY can not accurately model driver behaviour at this junction and therefore considers the slow moving traffic to be an actual queue, whereas in practice it is not a queue, the queue lengths are therefore overestimated. The 2023 AM peak with development estimates queues to be 54 vehicles on Leckhampton Lane and 178 on the A46 eastbound. The 2023 AM peak with development and with the Leckhampton Lane capacity restriction estimates queues to be 4 vehicles on Leckhampton Lane and 87 on the A46 eastbound.

The PM peak 2023 scenario without development demonstrates that maximum average queues on Leckhampton Lane will be 88 PCU's with queues of 315 PCU's travelling eastbound into Cheltenham. The 2023 PM peak with development estimates queues of 95 PCU's on Leckhampton Lane and 328 PCU's on the A46 eastbound. It should be noted that PICADY can not accurately model driver behaviour at this junction and therefore considers the slow moving traffic to be an actual queue, whereas in practice it is not a queue, the queue lengths are therefore overestimated. The 2023 PM peak with development and with the Leckhampton Lane capacity restriction estimates queues to be 12 vehicles on Leckhampton Lane and 145 on the A46 eastbound.

The results of sensitivity tests indicate that there would be an improvement on the capacity of the junction if the capacity restriction along Leckhampton Lane was implemented. The number of right turning vehicles into Leckhampton Lane from the A46 would be reduced; however this would increase through traffic and therefore impact the local network elsewhere. Although the development will clearly increase traffic on the network, the overall capacity at the junction will improve as part of the development mitigation measures. It is not considered that the residual cumulative impact of development at this junction will be 'severe'

A46 Shurdington Road/Up Hatherley Way Roundabout

The 2023 AM modelling indicates that queues at this roundabout are up to 6 PCU's in all scenarios including the Leckhampton Lane capacity restriction. The 2023 PM peak without development is estimated to have queues on 6 PCU's on the A46 east arm of the roundabout, queues of 9 PCU's with development and queues of 15 vehicles on the A46 east arm and 16 vehicles on the A46 west arm with the development traffic. The increase in queues on the A46 with the capacity restriction is expected, as less traffic is turning into Leckhampton Lane from the A46 and will be continuing along the A46. It is not considered that the residual cumulative impact of development at this junction will be 'severe'.

A46 Shurdington Road/Kidnappers Lane Signalised Junction

A new eastern site access will replace the existing A46/Kidnappers Lane priority junction, which will be closed to vehicular traffic. The site access has been modelled in the 2023 future year scenario with development only. The AM modelling demonstrates queues of 6 PCU's on the A46 west arm with queues of 7 PCU's on the A46 west arm with the Leckhampton Lane capacity restriction. The PM peak modelling estimates queues of 8 PCU's on the A46 east arm with queues of 10 PCU's on the A46 west arm. The mean max queues in the PM peak change from the A46 east to west with the introduction of the Leckhampton Lane capacity restriction. This is due to additional vehicles travelling eastbound along the A46 due to the restriction which will increase queues on the west arm of the A46. The junction modelling shows that this junction would operate within capacity in the future year of 2023.

A46 Shurdington Road/Woodlands Road Priority Junction

The 2023 modelling in the AM peak period estimates queues on Woodlands Road to be around 2 PCU's in all scenarios, including with the Leckhampton Lane capacity restriction being implemented. This is due to the fact that the re-distribution of traffic across the network due to the restriction at Leckhampton Lane is more staggered over the AM peak, than the PM peak. The 2023 modelling indicates that queues in the PM peak hour with and without development would be around 12 PCU's along Woodlands Road. The 2023 PM peak modelling indicates that queues on Woodlands Road with the capacity restriction in place would be 101 PCU's, however in practice this queue will not occur. The PICADY model is unable to replicate driver behaviour, whereby drivers on the A46 slow down to allow drivers to exit Woodlands Road, the model therefore assumes that traffic from Woodlands Road cannot exit onto the A46 due to the slow moving traffic on the A46 blocking this movement, however in practice the slow moving traffic aids the egress from Woodlands Road. Due to the general re-assignment of traffic across the network it is likely that flows along Woodlands Road would increase, however the queuing as predicted by PICADY would not occur. It is not considered that the residual cumulative impact of development at this junction will be 'severe'.

A46 Shurdington Road/Moorend Park Road Signalised Junction

The 2023 AM modelling results estimates that there will be queues of around 37 PCU's in all scenarios, including with the Leckhampton Lane capacity restriction. Despite the modelling results, it is expected that the queues would increase in the AM peak hour, however as the junction is

nearing capacity in 2023 assessment year, the SATURN model has assumed that traffic will re-distribute onto other routes, this will be explained more in the SATURN section of this report. It should be noted that when the traffic counts were undertaken the signals were not fully optimised with the MOVA operation, therefore any counts and subsequent future year assessment modelling did not consider the full impact of the intelligent signals. The modelling therefore represents a worse case scenario.

The 2023 PM modelling indicates that the junction is already over capacity without the development, with queues of 64 PCU's on the A46 west arm of the junction. The modelling with the development traffic included is predicted to slightly reduce the queues at the junction due to the general re-assignment of traffic across the network. The SATURN model assigns traffic based on the quickest route, it does not simply add all traffic to the back of an existing queue, therefore traffic from the A46 has re-assigned to other routes.

The SATURN model will also take into account the additional delays on the A46 resulting from the proposed points of access to the development, which will also impact the re-assignment and increase the number of drivers which alter their route. However, the impact of the Leckhampton Lane capacity does have a significant impact on queues at this junction in the PM peak hour. The model estimates that queues will increase to 96 vehicles on the A46 east arm of the junction, this is not surprising given the high flow of vehicles leaving Cheltenham in the PM peak. The reason the queues increase at the junction with the Leckhampton Lane capacity restriction, is due to traffic being unable to re-assign along Leckhampton Lane and additional traffic is travelling along the A46.

A slight anomaly occurred with the base modelling, which did not include the full optimisation of the intelligent signals, which subsequently results in the future year modelling being overly robust. Furthermore, the modelling does not consider the mitigation proposed by the developer, namely improvements works to the junction to produce extra capacity, travel planning measures to reduce development and existing network trips and the enhancement of the signals with bus priority known as real time passenger information. Given the above improvements together with the overly robust nature of the modelling, and that the fact that this site is allocated in the JCS for development, it is not considered that the residual cumulative impact of development is within acceptable parameters

A46 Shurdington Road/Leckhampton Road/Norwood Road Roundabout

The mean max queues for all scenarios increase slightly with the development in 2023 from around 2 to 3 PCU's in the AM peak and from 5 to 6 PCU's in the PM peak. Overall, the Leckhampton Lane capacity restriction makes no material difference to the operation of this junction due to the general re-distribution of traffic across the local network. It is not considered that the residual cumulative impact of development at this junction will be 'severe'.

Leckhampton Road/Church Road/Charlton Lane Double Mini Roundabout

The ARCADY modelling indicates that queues on the southern approach will increase in the 2023 AM peak from around 21 to 28 PCU's, whilst the capacity restriction on Leckhampton Lane makes no material difference. In the 2023 PM peak the mean max queues with and without development on the southern and northern approaches are 13 PCU's, however this increases to 21 PCU's on the

northern approach with the Leckhampton Lane capacity restriction. It is not considered that the residual cumulative impact of development at this junction will be 'severe'.

Mitigation Measures

Impact of Leckhampton Lane Capacity Restriction

The modelling demonstrates that the impact of the capacity restriction can be beneficial on some routes; however there is an adverse impact on other routes, due to the re-assignment of traffic on the network. The table below extracted from the TA shows the comparison with and without the constriction, but does not show the wider impact.

	Two-way Traffic (PCUs) - Morning Peak Hour				
Link	Flows without development	No Capacity Restriction		With Capacity Restriction	
		flows	Compared to base	flows	Compared to base
Church Road east of Kidnappers Lane	958	955	-3	648	-310
A46 east of A417	2726	2733	+7	2710	-16
A46 east of Norwood Road	1388	1419	+31	1365	-32
Badgeworth Lane	662	663	+1	535	-127
Up Hatherley Way west of Caernarvon Rd	1186	1166	-20	1134	-52
Hatherley Road east of Cold Pool Lane	330	340	+10	349	+19
Caernarvon Road west of Alma Road	705	788	+83	781	+76
A40 east of M5 junction 11	5852	5907	+55	5927	+75
A417 east of A46	2215	2212	-3	2247	+32
Leckhampton Hill	1512	1523	+11	1492	-20
A435 Cirencester Road	1271	1282	+11	1322	+51

	Two-way Traffic (PCUs) – Evening Peak Hour				
Link	**Flows without development**	**No Capacity Restriction**		**With Capacity Restriction**	
		flows	**Compared to base**	**flows**	**Compared to base**
Church Road east of Kidnappers Lane	1135	1242	+107	994	-141
A46 east of A417	2613	2628	+15	2647	+34
A46 east of Norwood Road	1315	1315	0	1309	-6
Badgeworth Lane	938	921	-17	767	-171
Up Hatherley Way west of Caernarvon Rd	1356	1395	+39	1195	-161
Hatherley Road east of Cold Pool Lane	583	585	+2	638	+55
Caernarvon Road west of Alma Road	645	683	+38	741	+96
A40 east of M5 junction 11	5593	5648	+55	5567	-26
A417 east of A46	2805	2796	-9	2807	+2
Leckhampton Hill	1198	1235	+37	1311	+113
A435 Cirencester Road	896	921	+25	934	+38

Overall, our recommendation is that due to the general wider re-assignment of traffic, which would result from the capacity restriction, and the adverse impact this would cause, primarily to the public transport corridor on Shurdington Road, the benefit that these restrictions may have on Leckhampton Lane are outweighed by the disadvantages to the, bus frequency, Shurdington Road and surrounding network, that these works should not be implemented. It is considered that allowing traffic to use as many routes as possible and dissipate more "evenly" across the network, is the preferred GCC strategy, for a sustainable development.

Other Measures Considered

Moorend Park Junction

GCC suggested that vehicles turning right from Shurdington Road at the Moorend Park Road adversely affect the junction performance and increases queue lengths on Shurdington Road. The traffic survey at the junction identified some 39 vehicles turning right approaching from the east and some 63 turning right from the west in the morning peak hour. In the evening peak hour the surveys identifies some 44 vehicles turning right approaching from the east and some 87 turning right from

the west. The traffic survey identified some 167 vehicles turning right approaching from the north and some 15 turning right from the south in the morning peak hour. In the evening peak hour the surveys identifies some 336 vehicles turning right approaching from the north and some 18 turning right from the west.

A series of sensitivity tests were undertaken by PEP to determine the impact of banning right turns from different arms of the Moorend Park Road for the existing and proposed traffic conditions with the development of the illustrative masterplan.

In summary the results indicate that banning the right turns on Shurdington Road and utilising the road space to improve the junction capacity gives a small improvement to the operation of the junction but makes little material difference to the queuing on Shurdington Road.

Banning the right turns on Moorend Park Road and utilising the road space to improve the junction capacity has more of an impact on the operation of the junction. The testing indicates that the optimum cycle time, phasing and staging can be revised, which gives an improved capacity and reduced queue lengths on all arms.

GCC consider that capacity improvements at this junction, based on a design proposed by GCC's signal consultant, and not involve the banning of any movements, is recommended.

Leckhampton Lane Junction

The Leckhampton Lane junction with Shurdington Road is a three-arm priority junction with Leckhampton Lane as the minor arm. Traffic surveys undertaken in 2011 identified some 284 vehicles turning right during the morning peak hour and 249 in the evening peak hour. The traffic waiting to turn right blocks the ahead movement.

The TA notes that capacity testing of the junction does not give representative results because of the driver behaviour. A review of video footage indicates that drivers travelling westbound on Shurdington Road stop or slow down deliberately to allow right turners into Leckhampton Lane. Right turners are usually only delayed by a maximum of five seconds because of the artificial gaps created by the drivers. Left turners from Leckhampton Lane also take advantage of this to access Shurdington Road.

Consideration has been given to upgrading the junction. The options considered have included:

- providing a right turn lane to enable ahead traffic to pass right turning traffic
- providing traffic signals to give right turning traffic the ability to cross opposing ahead traffic;
- banning right turning traffic on Shurdington Road;
- the introduction of traffic calming measures along Leckhampton Lane to discourage traffic from turning right from Leckhampton Lane.

Changing the form of the junction is not a viable option because there is not enough land within the highway boundary. Banning right turns or introducing traffic calming measures on Leckhampton

Road to reduce capacity indicates that there would be some improvement at the junction. The banning of this movement would result in increased pressures on the A46 and is therefore not considered reasonable. The SATURN modelling demonstrates the impact of the capacity restriction at Leckhampton Lane.

In summary the simplistic testing indicates that banning or limiting the right turn would cause additional right turners at the Kidnappers Lane junction and the Moorend Park Road junction. If the right turn is banned completely the delay currently seen at Leckhampton Lane is likely to shift to Moorend Park road.

Eastern Site Access Sensitivity Test

Concerns were raised by the highway authority regarding the right turn movement into and out of the eastern site access, which is proposed to form a priority junction with the A46, the issues were potential additional delay on the A46 by right turning traffic. Modelling was undertaking banning the right turn from the A46 and the right turn onto the A46, and that the traffic banned from undertaking these movements use the new signalised Kidnappers Lane Junction. The modelling indicates that the western site access operates within capacity when accommodating the additional right turning traffic into and out of the site and that the queuing along the A46 would not exceed the available road space. It is predicted that queues on Woodlands Road would increase in the PM peak hour due to additional vehicles turning right out of Woodlands Road to access the eastern site access; however as with the previous Woodlands Road modelling, the model overestimates queues at this location as it can not replicate driver behaviour accurately.

Overall, it is considered that very little development traffic would choose to use to the eastern site access, due to the availability of the signalised western access and high traffic flows along Shurdington Road, however traffic that did decide to turn right from the A46 into the eastern site access would be able to turn due to slow moving traffic conditions in the peak hours. It is not considered that banning the right turn is necessary to mitigate the impact of the development.

Personal Injury Collisions

Personal injury accident data for the approach road network for the three year period May 2010 to April 2013 was obtained from Gloucestershire County Council by PEP. There were no reported accidents on Kidnappers Lane, Farm Lane, Moorend Park Road or Hall Road. There are no clusters of accidents in the area. There are four separate junctions with two accidents, although at each junction the accidents were unrelated. There were two accidents near the Shurdington Road/Church Lane junction. One slight accident involved a rear end shunt and one serious accident involved a cyclist undertaking a queue of traffic. There were two slight accidents at or near the Shurdington Road/Leckhampton Lane junction, involving a pedestrian crossing the road and a right turning vehicle colliding with a cyclist travelling in the opposite direction. There were two accidents at the A46 Shurdington Road/Up Hatherley Way roundabout. One slight accident involved a vehicle colliding with another vehicle after losing control. One serious accident involved a vehicle clipping a cyclist. There were two accidents at the Leckhampton Road/Moorend Road junction. One serious accident involved a vehicle reversing out of a drive and hitting a pedestrian and one slight accident involved a vehicle pulling out of the junction into the path of another vehicle.

There was one fatal accident on Leckhampton Road involving a vehicle colliding with an elderly pedestrian crossing the road. There was one serious accident on Shurdington Road near the Kidnappers Lane junction involving a lorry hitting a pedestrian. The accident was as a result of a suicide attempt. There was one serious accident along Shurdington Road between Woodlands Road and Moorend Park Road involving a vehicle hitting a pedestrian crossing the road. There was one serious accident near the Painswick Road junction where a right turning vehicle collided with an oncoming motorcycle. There were three slight accidents along Church Road, two of which were in Leckhampton village and involved pedestrians. One accident was as a result of a speeding vehicle clipping a pedestrian and one accident involved a child running into the road. The accident at the Leckhampton Lane/Crippetts Lane junction involved a vehicle pulling out of the Crippetts Lane arm of the junction into the path of another vehicle travelling along Leckhampton Road. Elsewhere accidents were single slight accidents in a range of locations including along Shurdington Road close to the site frontage, at the Moorend Park Road junction, further north of the Moorend Park junction and along Leckhampton Road.

The local safety records do not meet the criteria for examination in the Local Authorities Association former guidelines. No junction has been identified by the County Council in their latest review as needing attention. The County Council is monitoring the safety record on Leckhampton Road as a result of two fatal accidents in different locations, although the road is not identified as needing attention.

Impact

It is inevitable that this development will have some impact, as there will an increase in the number of vehicle trips onto the network, primarily during the am and pm peak. The developer has sought to use containment, and travel pattern plans, to either reduce peak hour travel, or amend daily travel patterns to maximise the capacity of the highway corridors. The A46 is an important route from the A417 to the A46, and is usually busy during predominately 2 distinct weekday periods, nominally 7am – 8 am and 4pm – 6 pm (GCC survey data April 2013)

Using this traffic data we can see that the A46 is relatively free flowing for 19 hours a day. During these remaining 5 hours, the A46 experiences queuing, of varying degrees.

It is perhaps worth understanding queuing and congestion. Congestion can be defined as an increase in the level of traffic flow, causing the average speed of vehicles to reduce. There are several types of congestion.

Recurrent congestion; this is a regular occurrence such as peak hour congestion or regular events.

Non-recurrent congestion—this is unexpected occurrences such as accidents or vehicle break-down.

Pre-congestion or borderline congestion—this is where vehicles have slowed, but are not actually affected by the congestion, such as before and after peak times, or approaching a congested area. This report looks at recurrent congestion.

The A46 experiences recurrent congestion. Congestion leads to delays in journeys and unreliability in journey times. Slow and stationery traffic can have an effect on air quality. Therefore congestion

can affect the economy, quality of life and the environment. However we need to measure the existing queuing and congestion, and determine what the impact of this development, and whether that impact is severe

2 junctions (Moorend signals and A46/Leckhampton Lane) are noted to currently have capacity issues and this development will add to the performance of these junctions. However the development is only required to mitigate its own impact, and not any existing capacity issues.

From the traffic survey data these situations of congestion are relatively short lived and unlikely to translated into severe congestion, in terms of the NPPF

Once again, this is not to say that there would be no queuing, but delays should be of relatively short duration and certainly not of such significance as to amount to a severe delay. In the off-peak no particular problems are predicted under normal conditions.

Some of the minor roads on to the A46 do experience queuing and this would be expected onto any Primary/Principal road. But the highway authority prioritised the A46 flows as unhindered as possible, especially to accommodate bus frequencies, and the sake of relatively small queue lengths on minor side roads.

Severe

The NPPF states that;

Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

But what is severe? The dictionary has alternatives for severe; acute, very bad, serious, grave, critical, dire, drastic, grievous, extreme, dreadful, terrible, awful, frightful, appalling.

Obviously the use of the term severe has been to convey something very extreme, to ensure that authorities only prevent development on transport grounds in overwhelming conditions

In everyday language we use severe to identify something that rarely occurs and we should be aware, “severe weather” would be an example to describe flooding.

Perhaps we need to understand why the NPPF is using such terminology, in transport when previously it was “nil detriment” or “5%” increase”. Previously nil detriment or 5% resulted in refusal on transport grounds or requiring very expensive infrastructure to resolve. Both of these solutions inevitable resulted in reduced delivery of housing as developers could no t deliver, as sites were unviable

To try and understand how you might calibrate severe in transport terms might be to look at how government local pinch point funding is allocated. Local pinch point funding seeks to remove bottlenecks on the local highway network which are impeding growth. The fund reflects the government’s commitment to supporting economic growth by tackling barriers on the local highway

network that may be restricting the movement of goods and people. The fund is aimed at those schemes that can be delivered quickly with immediate impact.

Two junctions schemes in Gloucestershire were identified which were causing congestion that, affected not only the junctions, but the secondary and tertiary links of the highway network. These schemes were Walls roundabout, and Over roundabout in Gloucester. Capacity improvements on these would improve the free flow of movement on many parts of the network in the surrounding area that were previously restricted.

As described Shurdington Road experiences queuing during morning and peak peaks, and this development will add trips, but it is the view of the highway authority that with the mitigation recommended, the development would not have a serve residual cumulative impact, in the context of the NPPF.

Chapter Summary

A Transport Assessment (TA), dated September 2013, was submitted in support of the application, it is considered that the TA was broadly in accordance with the DfT's Guidance on Transport Assessment (GTA). Trip rates for the 1200 units together with the employment, primary school and ancillary uses were derived from the TRICS

Traffic has been distributed and assigned to the network using the information extracted from SATURN. The distribution for the existing residential zones within the model were determined from road side interview surveys undertaken by GCC in 2003 and 2008 as part of the model update, this was validated using traffic count data. The trip distribution for the employment element of the development was derived from the 2001 census travel to work data.

Local junctions were identified and modelled with DfT approved computer programmes, to establish the future (2031) capacity of each junction with and without the development

Personal injury accident data for the approach road network for the three year period May 2010 to April 2013 was obtained from Gloucestershire County Council.

In is inevitable that this development will have some impact, as there will an increase in the number of vehicle trips onto the network, primarily during the am and pm peak. The developer has sought to use containment, and travel pattern plans, to either reduce peak hour travel, or amend daily travel patterns to maximise the capacity of the highway corridors.

The highway authority is satisfied that subject to mitigation a safe a suitable access for all can be achieved, the cumulative impacts of the development are not severe, and the development will actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, to be made more sustainable.

MOOREND SIGNALS JUNCTIONS SKETCHES

1. **OS Base**

2. **Option 1 Improvement west approach**

Chapter 6

STRATEGIC MODELLING

Scoping Agreement

As noted in the Applicant's transport consultants' Transport Assessment (TA) Report, the application traffic studies were based on liaison with Gloucestershire County Council (GCC) as local highway authority and the Highways Agency (HA) as the national highway authority. The applicant's traffic consultant initially prepared a 'Scoping Study' and the assumptions and methodology were subsequently agreed through this liaison process. This included agreement on the approach to traffic forecasting, using GCC's Central Severn Vale (CSV) SATURN, Strategic Highway Peak Hour Traffic Model.

CSV SATURN Model - Background

The CSV SATURN model is owned by GCC and part funded by the HA and has been developed over a number of years by GCC's traffic modelling term consultants to facilitate the testing and assessment of alternative land-use options and highway infrastructure plans and proposals. It has a current model 'base year' of 2008, and has been widely used over recent years to forecast the traffic impacts of a number of future development proposals, schemes and strategies in the Central Severn Vale area.

The model includes the Gloucester and Cheltenham urban areas and the M5 motorway corridor between junctions 12 (to the south) and 9 (to the north) as the core 'simulation' (detailed) area, with the rest of the County modelled as 'buffer' (outer) network. It should be noted that the CSV model is strategic in nature, meaning that although the core urban areas are modelled in relative detail, not all the local roads in the outer simulation and buffer networks are included in the modelled highway network. Such is the case with the Leckhampton area, which is located on the south-west outskirts of the Cheltenham urban area, with only the main roads and key distributors being modelled in that area.

Area Wide Strategic Modelling

The purpose of using an area wide strategic model is to gain an understanding of the wider traffic impacts of any development / schemes tested. Vehicle drivers choose a route through a particular highway network based on a range of factors including distance and speed (journey time), perceived delay, value of time and personal preference. All traffic models are based on mathematical algorithms which calculate the monetary costs of all relevant routes available for all origin-destination pairs, and assign vehicles accordingly to networks on a 'minimum journey time' basis. Minor adjustments to one small section of a preferred route e.g. the introduction of a flow restricting highway infrastructure can therefore have the effect of causing certain traffic movements to choose an alternative route to save time. This ability to predict the potential redistribution of traffic across a wider area is characteristic of a strategic traffic model.

As noted earlier, at the traffic forecasting scoping stage it was agreed to use the CSV SATURN strategic model to test the area wide impact of the proposed Leckhampton development. This required some minor manual adjustments in the local network area, where the model was lacking in detail. These adjustments were agreed with GCC, and comprised the addition of the Kidnappers Lane and Farm Lane local roads to the network, between A46 Shurdington Road and Leckhampton Lane / Church Road, as well as adjusting the position of where certain model zones loaded vehicle trips onto the local highway network.

Traffic Forecasting Process

It was agreed that the traffic forecasting process would be undertaken in the following two distinct stages, each comprising an analysis / comparison 'with' and 'without' the Leckhampton development, based on the application proposal:

- Stage One: Comprising a strategic analysis of traffic conditions in 2023 (the agreed future forecasting year), using the CSV SATURN AM and PM peak hour models;
- Stage Two: A second stage comprising a detailed capacity analysis of the effect of these future traffic movements at key junctions within the vicinity of the development site.

The relevant peak hour traffic flows were extracted from the CSV SATURN model runs and used as input to the Stage Two process – as briefly outlined above. This involved the use of 'stand-alone' junction capacity testing, assuming free flow conditions on adjoining network link sections. Industry standard ARCADY, PICADY and LinSig modelling software were used to assess roundabout, priority junctions and traffic signal controlled junctions respectively. The reason for these local junction assessments is that stand-alone junction models provide more detail in how each individual junction is modelled and are therefore more sensitive to minor variations in traffic flow than the strategic model.

The applicant's TA, dated September 2013, and subsequent Supplementary Traffic Note, dated January 2014, have provided capacity testing results for the following list of junctions – which were discussed and agreed with GCC at the scoping stage:-

A46 Shurdington Road/Leckhampton Lane – Priority Junction;

A46 Shurdington Road/Up Hatherley Way – Roundabout;

A46 Shurdington Road/Kidnappers Lane – Priority Junction;

A46 Shurdington Road/Woodlands Road – Priority Junction;

A46 Shurdington Road/Development Site Access – Priority Junction;

A46 Shurdington Road/Moorend Park Road – Traffic Signal Junction;

A46 Shurdington Road/Leckhampton Road/Norwood Road – Roundabout; and

Leckhampton Road/Church Road/Charlton Lane – Double Mini-Roundabout.

The outcomes from these various junction capacity assessments are reviewed and discussed in Chapter 5.

Future Forecasting Year for Assessment

A design year of 2023 was agreed with both GCC and the HA, as the likely completion date for the application development. Hence this was the future horizon year assumed for traffic testing purposes, although it was noted that the build out period will be dependent on market conditions over the construction period. Also, a 2023 forecast year represents a period of 10 years after the registration of the planning application, which is in accordance with Department for Transport (DfT) guidance.

Applicants Development Proposals

The land use proposals included within the red line application site boundary which forms part of the overall Illustrative Masterplan for the whole of the Leckhampton development area – as shown in the TA - Appendix 7, comprise the following mixed uses:-

- Up to 650 residential dwellings;
- A primary school;
- A GP Doctors Surgery;
- A local convenience store and small retail unit; and
- 4,500 sq m of either one or more of the following –B1 employment, Care home, dentist, children's nursery, cottage hospital, other Class A uses.

Trip Generation and Distribution

Vehicle trip generation rates and distribution assumptions were agreed through discussions with GCC, and included in a 'CSV Model Briefing Note – dated September 2013'. These have since been included in both the main TA document, dated September 2013, as part of the Appendix 9 – TN13 Traffic Forecasting Report, and also in the Supplementary Traffic Note, dated January 2014, as part of Chapter 2 – Vehicle Movements.

The agreed vehicle trip rates for the various proposed land uses listed above are shown in Chapter 3. Within the CSV SATURN model, the agreed distribution of the new residential vehicle trips onto the surrounding network has been based on the existing distribution patterns for nearby residential zones; while for the employment related trips, these were based on information provided by the applicant's transport consultants, based on 2001 journey-to-work census data (at the time that the CSV SATURN traffic modelling work was agreed and commissioned, information from the 2011 census was not yet available).

Other Future Land Use Assumptions

As discussed the DfT Guidance on Transport Assessments states that future year assessments should include only the development proposal together with any committed developments. These forecast local traffic growth rates are included in TEMPRO.

However, following discussions between the applicant's traffic/planning consultants and Cheltenham Borough Council it was agreed that, rather than using 'general' TEMPRO growth factors, applying the draft Joint Core Strategy (JCS) proposals would provide a more accurate detailed

estimate of forecast housing numbers in the CSV modelled area and should therefore be taken into account in the testing of any future year modelling scenarios. GCC highways officers subsequently accepted CBC's direction during the model scoping discussions, and progressed with the strategic traffic modelling on that basis.

With an agreed 2023 future design year as the likely date for completion of the application development, hence this was the year assumed for forecast traffic modelling purposes. The 2023 land use forecasts therefore took into account existing permissions not yet implemented, sites already allocated in adopted Local Plans, together with estimates of likely development resulting from further development by 2023 in the emerging JCS, with particular steer taken from the 'Developing the Preferred Options' consultation document and the associated Housing Background Paper, dated November 2011.

The assumed land uses as originally provided for the CSV SATURN modelling purposes were included in the TA – Appendix 9. Before commencement of the traffic modelling, these have since been amended to take account of minor revisions to the proposed JCS allocations, including a reduction in the number of dwellings envisaged for the illustrative masterplan area for Leckhampton, from 1,300 down to 1,200 all of which are assumed to be completed by 2023.

PEP 'CSV Model Briefing Note – September 2013' sets out the final agreed JCS housing development build out assumptions by 2023 for modelling purposes. These are summarised in the table below.

JCS Area	**Assumed Housing Numbers built by 2023**
Leckhampton – Applicants Site	650
Leckhampton – Illustrative Masterplan – Other Development	350 + 200
North West Cheltenham	2,200
Starvehall Farm	380
North of Brockworth	1,275
Churchdown	400
North of Gloucester (Innsworth & Twigworth)	1,405
Tewkesbury (Town)	919
Tewkesbury (Rural)	1,350

Since the traffic modelling was carried out, the allocations in the draft JCS for final approval have been amended yet again, particularly with regard to the total housing numbers for Innsworth & Twigworth (reduced down to 1,400 by 2031) and to the location of the Churchdown sites. These changes show clearly the continuing level of uncertainty inherent in any traffic modelling exercises undertaken in advance of confirmation and approval of the final agreed JCS development numbers.

Strategic Traffic Modelling – Comparison of Option Tests

Referring to the Applicant's most recent 'Supplementary Traffic Note', dated January 2014, which should be viewed along with the earlier TA Report, dated September2013, this section provides a high level overview of the CSV SATURN strategic model traffic assignment in the south west Cheltenham area immediately adjacent the Leckhampton development site.

In addition to the 2012 observed vehicle flows, collected from local traffic survey data, a series of three 2023 design year assignment options have been compared to assess the impact of the application site. These comprise:-

- 2023 Base + JCS Developments, Without the Leckhampton Application Development Site,
- 2023 Base + JCS Developments, With the Leckhampton Application Development Site, and
- 2023 Base + JCS Developments, With the Leckhampton Application Development Site, but with a restricted capacity (150 vehicles per hour each way) on Leckhampton Lane, with the aim of restricting through traffic.

In addition to the development associated with the application site (650 houses) as part of the overall Leckhampton JCS development allocation, developments at Farm Lane (circa 350 houses) and on the Council Land (circa 200 houses) have been assumed to make up the cumulative total of 1,200; as such, both of these sites have been assumed as part of the 2023 Base + JCS Developments.

In addition to the 2012 base flows, CSV SATURN model traffic assignments for each of the three options are presented as a set of directional traffic flows on the attached spreadsheet traffic flow diagrams, separately for the AM (08:00-09:00) and PM (17:00-18:00) peak hours.

Before comparing the traffic assignments for each of the options under review, it should be noted that the traffic flows used in both the strategic overview and the detailed junction capacity assessments have not taken account of possible mitigation measures aimed to reduce both existing traffic on the adjacent road network and the predicted traffic generation from the applicant's development proposal.

Forecast traffic flows could be affected by a potential future Park & Ride facility which might be located on the A46 Shurdington Road corridor, while a package of residential travel plan measures would aim to reduce vehicle trips generated by the new development. Public transport improvements and area wide work place travel planning would also help reduce future vehicle trips on the existing highway. It is therefore agreed that the subsequent junction modelling reported in the Applicant's TA – September 2013, and most recent Supplementary Traffic Note – January 2014, has therefore provided a robust assessment.

SATURN Outputs

As part of the commissioned SATURN modelling, Atkins prepared 2 Technical Notes, TN05 and TN06.

The second TN was produced to create new scenarios based on a reduced number of dwellings (650). This has caused a confusing number of flow plots, which PEP should have clarified in a summary modelling note, and compared the differences.

These Technical Notes includes flow comparison diagrams, between different scenarios

TN05 Scenarios

Scenario 1: 2023 Base + JCS Developments

Scenario 2: 2023 Base + Leckhampton Application Development Site (1200 dwellings)

Scenario 3: 2023 Base + All Development including Leckhampton Application Development Site (1200 dwellings)

Scenario 4: 2023 Base + All Development excluding Leckhampton Application Development Site (1200 dwellings)

TN06 Scenarios

Scenario 1: 2014 Base + Joint Core Strategy (JCS) Development built out by 2014 (in line with the housing trajectories spreadsheet provided by PEP Consultants), WITHOUT the Leckhampton development

Scenario 2: 2014 Base + JCS Development built out by 2014 (in line with the housing trajectories spreadsheet provided by PEP Consultants), WITH the Leckhampton development

Scenario 3: 2023 Base + JCS Development built out by 2023 (in line with the housing trajectories spreadsheet provided by PEP Consultants), WITHOUT the Leckhampton development

Scenario 4: Sensitivity test '2023 Base + JCS Development built out by 2023 WITH the Leckhampton development', testing a capacity limit of 150 PCUs' (passenger carrying units) per hour on Leckhampton Lane.

a. The Leckhampton development to include only 650 houses, 4,500 sq m B1, 500sqm Retail and 300 sq m GP Surgery
b. The development at Farm Lane (c.350 houses, in model zone 305) and the development on the Council land, (c. 200 houses) to be included as part of the 'Base', rather than as part of the overall Leckhampton development.

SATURN outputs can take many forms, but it is worth looking at the overall redistribution that could occur when considering future background growth and the development traffic. As previously described SATURN is a peak hour model, so in this section I will attempt to compare the most relevant scenarios, to assess the level of impact on the network.

TN06 Scenario 3 versus TN06 Scenario 1

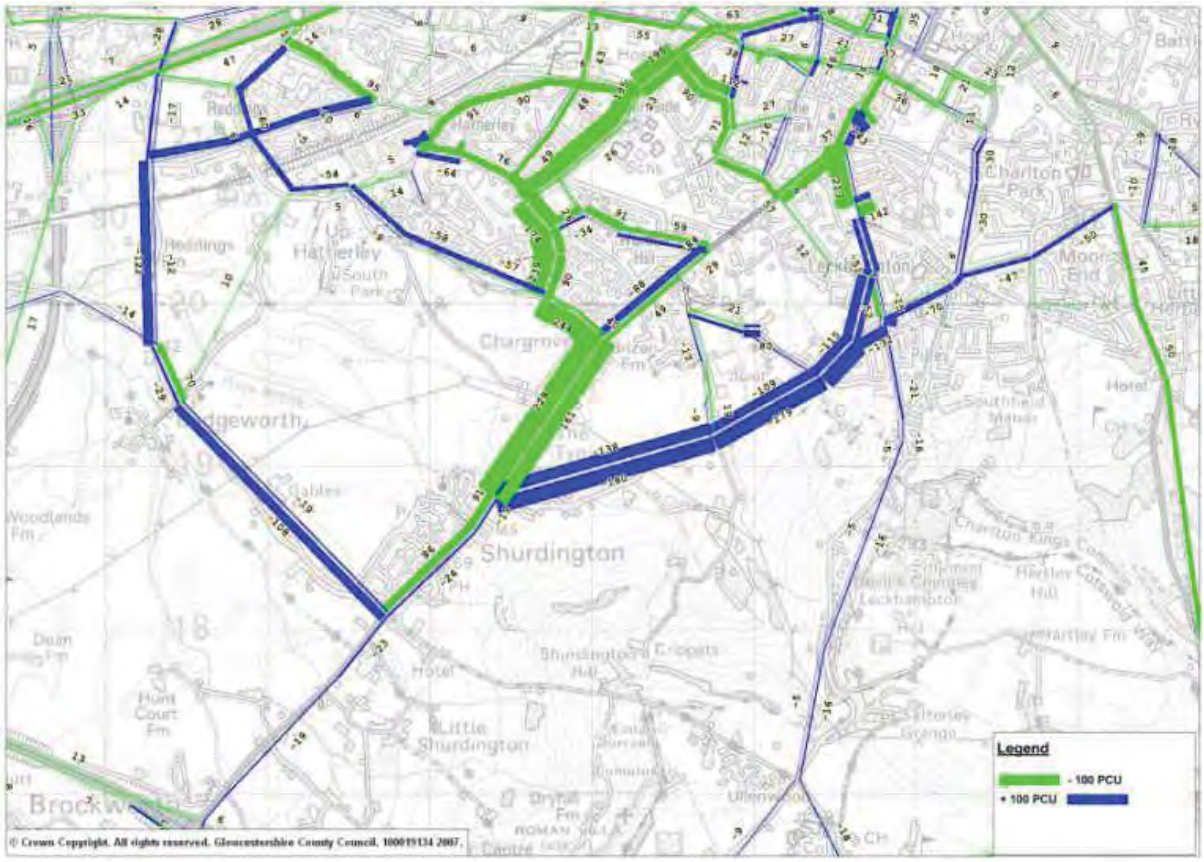
This scenario assumes what the network increase would be in year 2023, but without 650 houses (application site). This is showing 2023 minus 2014 and therefore shows what the increase in traffic would look like if growth occurred but WITHOUT Leckhampton.

TN06 Scenario 3 versus TN05 Scenario 3

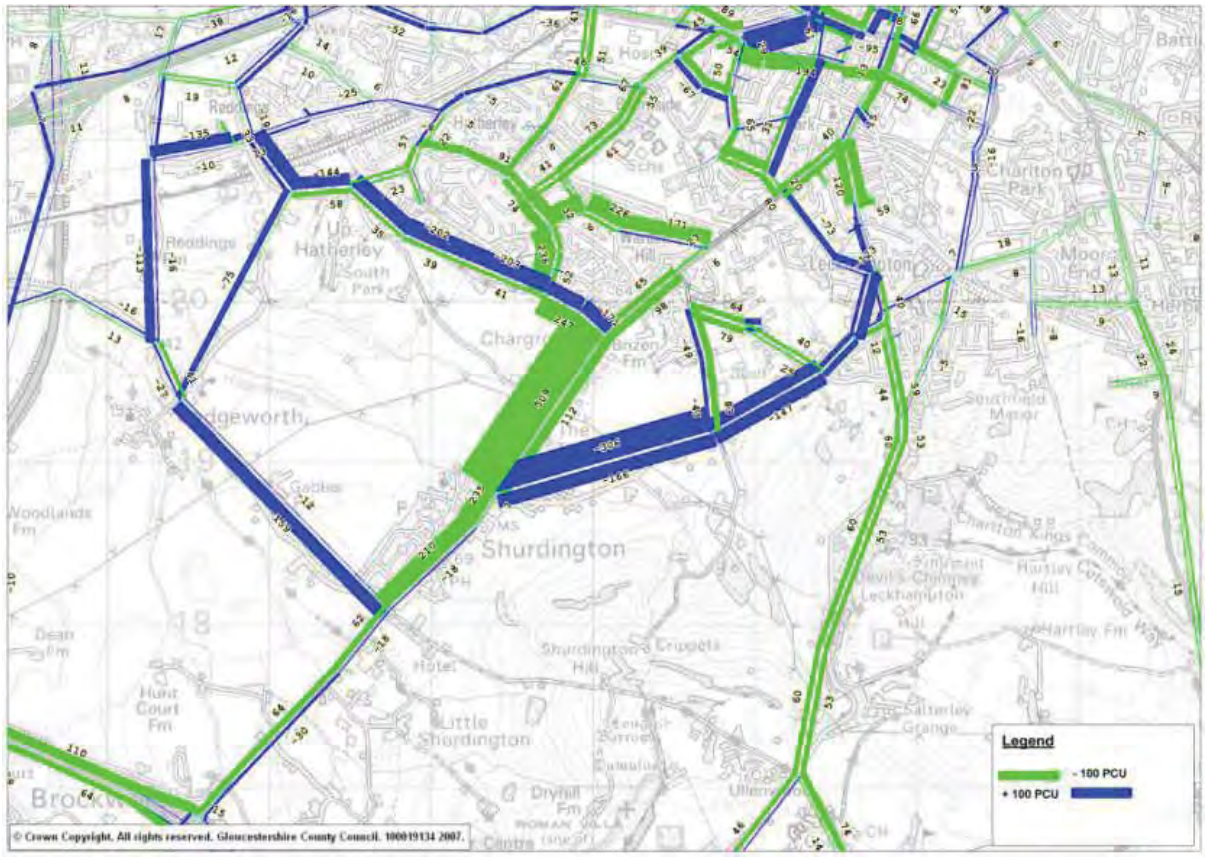
This scenario assumes what the difference in traffic flow and distribution would be in 2023 when the 650 houses (application), is included.

TN06 Scenario 4 versus TN06 Scenario 3

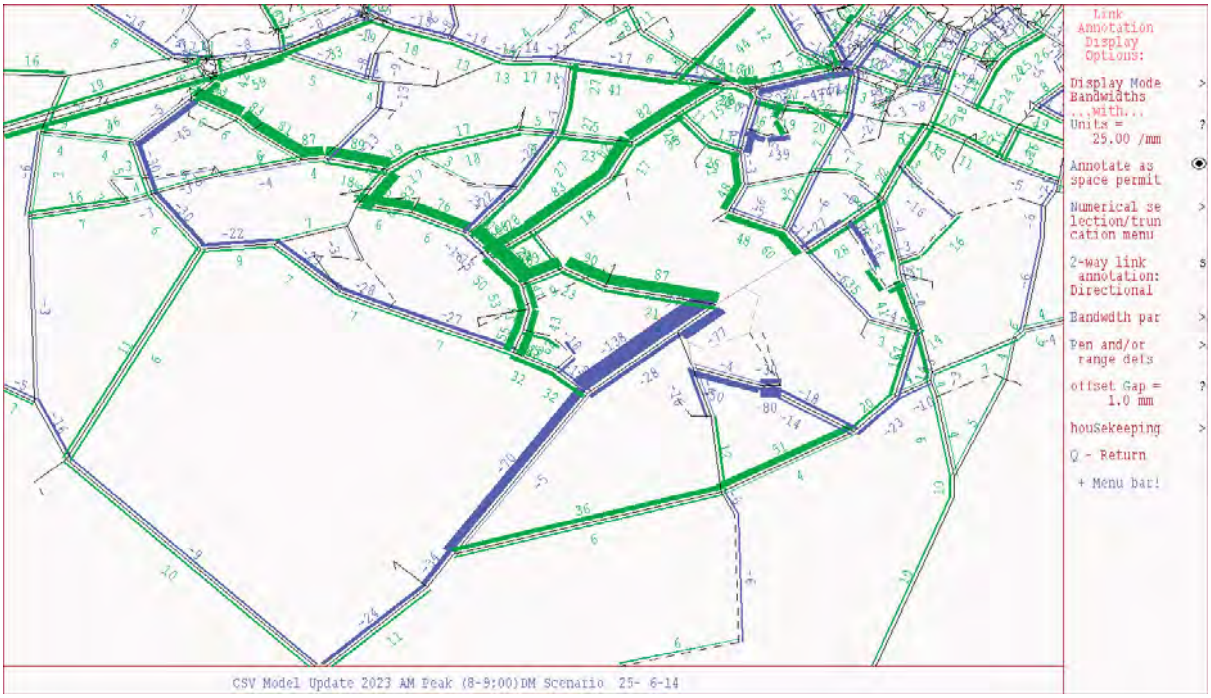
This scenario assumes what the network increase and redistribution would be in year 2023, with 650 houses (application site). This is shows where traffic would increase and redistribute to, if the flow restrictions work on Leckhampton Lane was implemented. The diagram below shows that with the Leckhampton lane restrictions on place, which effectively restricts flows through Leckhampton Lane, shows a morning peak redistribution of traffic eastwards from Shurdington Road (green lines), with onward travel to the town centre, and some flows coming back on to the Shurdington Road, via Woodlands Road and Moorend Road.



The second diagram below, which shows the reverse evening peak, shows a similar re-assignment



The concern with introducing this restriction on Leckhampton Lane is that SATURN is showing that with this in place flows may increase disproportionately on the existing network in Warden Hill. GCC consider that on balance it is preferable not restrict flows on Leckhampton Lane, as SATURN shows much more equalised flows across the whole network, as shown below in the 2023 AM base + JCS +650 dwellings plot.


Link
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Units =
25.00 /mm
Annotate as
space permit
Numerical se
lection/trun
cation menu
2-way link
annotation:
Directional
Bandwdth par
Pen and/or
range defs
offset Gap =
1.0 mm
houSekeeping
Q - Return
+ Menu bar!
CSV Model Update 2023 AM Peak (8-9:00)DM Scenario 25- 6-14

This SATURN plot shows a much wider redistribution of traffic, and even reduction on traffic along the frontage of the development persuadably due to the new access junctions.

Leckhampton with Warden Hill Neighbourhood Planning

Leckhampton with Warden Hill Parish Council formed a Joint Neighbourhood Forum for Neighbourhood Planning. A document was prepared which included a section on Traffic Congestion, and interalia pollutions levels. My response to these findings is limited to traffic flows, as air quality will be dealt with by CBC.

The parish has used mathematical formulae for traffic modelling, unfortunately I have no way of assessing how accurate, robust or credible the evidence base is, and whether the correct trip rates, distribution and growth patterns have been used, and what discount has been used for travel planning and trip banking.

Traffic models are primarily used to asses junction capacity in the morning peaks but this formulae appears to be measuring queue lengths, and does not appear to follow the DfT guidance on transport assessments

In the conclusion at 6.11 it suggests that the LTP3 describes the A46 as the worst congested hot spot in the Cheltenham - Gloucester area, and refers to a plan, which shows the 30 most congested junctions in 2026. Unfortunately this plan has been totally misinterpreted, as the 2 junctions on the A46, refer to the side roads at Bentham and Whitelands Lane. These are very narrow width side roads and when assessed with their ratio of flow to capacity (RFC), the side roads will be over capacity by some margin, with queues of only 4 or 5. Not only is this a gross exaggeration of the facts, (albeit the plan is not particularity clear), minor queuing on to the A46 is not considered an issue in the determination of this application.

However I do agree with statement regarding funding for infrastructure, and funding depends a lot on money from developers, however the NPPF only requires improvements to the transport network that cost effectively limit the significant impacts of the development.

The DfT approved SATURN modelling and isolated junction modelling has identified junctions currently without spare capacity, and this development will add to those junctions. Notwithstanding this the SATURN modelling does show that drivers will take alternative routes, modes, and choices and therefore with the package of capacity improvements, and travel planning, mitigation the view of the highway authority is that the development would not have a serve residual cumulative impact, in the context of the NPPF.

Chapter 7

Mitigation - Contributions

<u>Physical Works</u> (to be funded by development, through contribution)

• Merlin Way footpath improvement: £5,000

• Church Road works: £30,000

• Farm Lane/Crippets Lane/Leckhampton Lane visibility splay improvements: £5,000

• Kidnappers Lane Road Closure works (x3): £20,000

• Kidnappers Lane TROs (3 x £10,000): £30,000

• RTPI to Moorend Park Road signals: £10,000

• RTPI for other signals (4 x £30,000): £120,000 (to enable diversion of Service 10 bus)

<u>Public Transport – Contributions to Serve Development</u>

• Diversion of service J/K: £385,000 (minus ticket receipts ranging from £12,000 to £60,000 by year 5)

<u>Travel Plan</u>

Residential Travel Plan: £118,000

Non-Residential Travel Plan TPC budget: £18,000

<u>Non-Physical Off-Site Contributions</u>:

• South West Cheltenham Modal Shift Strategy: £400,000

Mitigation – Conditions

- Primary junction onto Shurdington Road
- Secondary junction onto Shurdington Road
- Improvements to Moorend signalised junction

Chapter 8

Reserved Matters

Parking

This is a reserved matter so a recommendation is not required on this element at this stage, and should be dealt with by the Reserved Matters condition application. Advice is given on this element to inform the developer in advance of the Reserved Matters application. Cycle parking is required at a minimum level of 1 space per dwelling and is required to be secure and sheltered. Car Parking is required to be provided in accordance with the criteria set out in paragraph 39 of the NPPF. Visitor car parking is also required to be included within the development. In order for garages to be counted towards the parking provision minimum internal dimensions of 3m by 6m are required. Parking courts should be avoided.

Layout

The layout of the site is also a reserved matter not to be agreed now. Advice is given on this element to inform the developer in advance of the Reserved Matters application. The layout will need to provide safe and suitable access to and from each dwelling for all modes. A Swept Path Analysis of the layout will be required demonstrating a large refuse vehicle (9.86m long, 3 axle) can traverse the site with an oncoming estate car with at least 0.5m clearance between the vehicles and other vertical boundaries such as kerbs and fences.

Chapter 9

Conclusions

Gloucestershire County Council as the local highway authority has assessed this application in light of the National Planning Policy, the CBC local Plan, and the emerging Joint Core Strategy, and other material considerations. In determining the type of recommendation the highway authority needs to assess if;

- the residual cumulative impact from the application is severe
- safe and suitable access for all can be achieved
- the opportunities for sustainable transport modes have been taken up
- any adverse impacts do not significantly and demonstrably outweigh the benefits of allowing the proposal

The applicant has used the SATURN strategic model as described earlier and local junction modelling techniques to understand the wider impact and the local capacity issues.

Wider Strategic Impact

The SATURN traffic modelling shows what happens if traffic travels along corridors of least resistance, and plots which routes that may be taken to avoid delays. The results shown that the best scenario is not to restrict flows on Leckhampton Lane, but allow traffic flow to balance along the corridors in Shurdington, Up Hatherley and Leckhampton.

Local impact

In is inevitable that this development will increase the number of vehicle trips onto the network. primarily during the am and pm peak. The developer has sought to use containment and travel pattern plans to either reduce peak hour travel, or amend daily travel patterns to maximise the capacity of the highway corridors. The A46 is an important route from the A417 to the A46, and is busy during predominately 2 distinct weekday periods, nominally 7am – 8 am and 4pm – 6 pm (GCC survey data April 2013)

Using this traffic data we can see that the A46 is relatively free flowing for 19 hours a day. During these remaining 5 hours, the A46 experiences queuing, of varying degrees.

It is perhaps worth understanding queuing and congestion. Congestion can be defined as an increase in the level of traffic flow, causing the average speed of vehicles to reduce. There are several types of congestion.

Recurrent congestion; this is a regular occurrence such as peak hour congestion or regular events.

Non-recurrent congestion—this is unexpected occurrences such as accidents or vehicle break-down.

Pre-congestion or borderline congestion—this is where vehicles have slowed, but are not actually affected by the congestion, such as before and after peak times, or approaching a congested area. This report looks at recurrent congestion.

The A46 experiences recurrent congestion. Congestion leads to delays in journeys and unreliability in journey times. Slow and stationery traffic can have an effect on air quality. Therefore congestion can affect the economy, quality of life and the environment. However we need to measure the existing queuing and congestion, and determine what the impact of this development, and whether that impact is severe

Two junctions (Moorend signals and A46/Leckhampton Lane) are noted to currently have capacity issues and this development will add to the performance of these junctions. However the development is only required to mitigate its own impact, and not any existing capacity issues.

From the traffic survey data these situations of congestion are relatively short lived and unlikely to translate into severe congestion, in terms of the NPPF

Once again, this is not to say that there would be no queuing, but delays should be of relatively short duration and certainly not of such significance as to amount to a severe delay. In the off-peak no particular problems are predicted under normal conditions.

Some of the minor roads on to the A46 do experience queuing and this would be expected onto any Primary/Principal road. But the highway authority prioritised the A46 flows as unhindered as possible, especially to accommodate bus frequencies, and the sake of relatively small queue lengths on minor side roads.

Therefore the highway authority is satisfied that subject to the recommended conditions and contributions a safe a suitable access for all can be achieved, the cumulative impacts of the development are not severe, and the development will actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, to be made more sustainable

Chapter 10

Draft Conditions

Draft Conditions subject to agreement with CBC and phasing of development

1). No works shall commence on site until full engineering details of the primary and secondary accesses to the development, generally in accordance with the approved access plans, have been submitted to and agreed in writing by the local planning authority, the approved works shall then be completed prior to any occupations of any proposed dwelling or unit, and shall be retained as such thereafter until and unless adopted as highway maintainable at public expense

Reason: To mitigate the impact of the development in accordance with paragraph 32 of the NPPF.

2). No works shall commence on site until full engineering details of the capacity improvement works at the Moorend Park Road/A46 junction, generally in accordance with GCC drawing Option 1 – Improvement A46 West, have been submitted to and agreed in writing by the local planning authority, the approved works shall then be completed prior to any occupations of any proposed dwelling or unit, and shall be retained as such thereafter until and unless adopted as highway maintainable at public expense

Reason: To mitigate the impact of the development in accordance with paragraph 32 of the NPPF.

3). Details of the layout and access, (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development begins and the development shall be carried out in accordance with the approved plans. No dwelling on the development shall be occupied until the carriageway(s) (including surface water drainage/disposal, vehicular turning head(s) and street lighting) providing access from the nearest public Highway to that dwelling have been completed to at least binder course level and the footway(s) to surface course level.

Reason: To minimise hazards and inconvenience for users of the development by ensuring that there is a safe and suitable means of access for all people.

4). No development shall be commenced until details of the proposed arrangements for future management and maintenance of the proposed streets within the development have been submitted to and approved in writing by the local planning authority. The streets shall thereafter be maintained in accordance with the approved management and maintenance details until such time as either a dedication agreement has been entered into or a private management and maintenance company has been established.

Reason: In the interest of highway safety; to ensure a satisfactory appearance to the highways infrastructure serving the approved development; and to safeguard the visual amenities of the locality and users of the highway.

NOTE: The applicant is advised that to discharge condition the local planning authority requires a copy of a completed dedication agreement between the applicant and the local highway authority or the constitution and details of a Private Management and Maintenance Company confirming funding, management and maintenance regimes.

5). No development shall commence on site until a scheme has been submitted to, and agreed in writing by the Council, for the provision of fire hydrants (served by mains water supply) and no dwelling shall be occupied until the hydrant serving that property has been provided to the satisfaction of the Council.

Reason: To ensure adequate water infrastructure provision is made on site for the local fire service to tackle any property fire.

NOTE: The developer will be expected to meet the full costs of supplying and installing the fire hydrants and associated infrastructure.

6). No phase(s) of the development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the Local Planning Authority for that phase. The approved statement shall be adhered to throughout the construction period. The statement shall provide for:-

- the parking of vehicles of site operatives and visitors;
- specify the type and number of vehicles;
- loading and unloading of plant and materials;
- storage of plant and materials used in constructing the development;
- wheel washing facilities;
- access routes to the specify the intended hours of construction operations;
- measures to control the emission of dust and dirt during construction

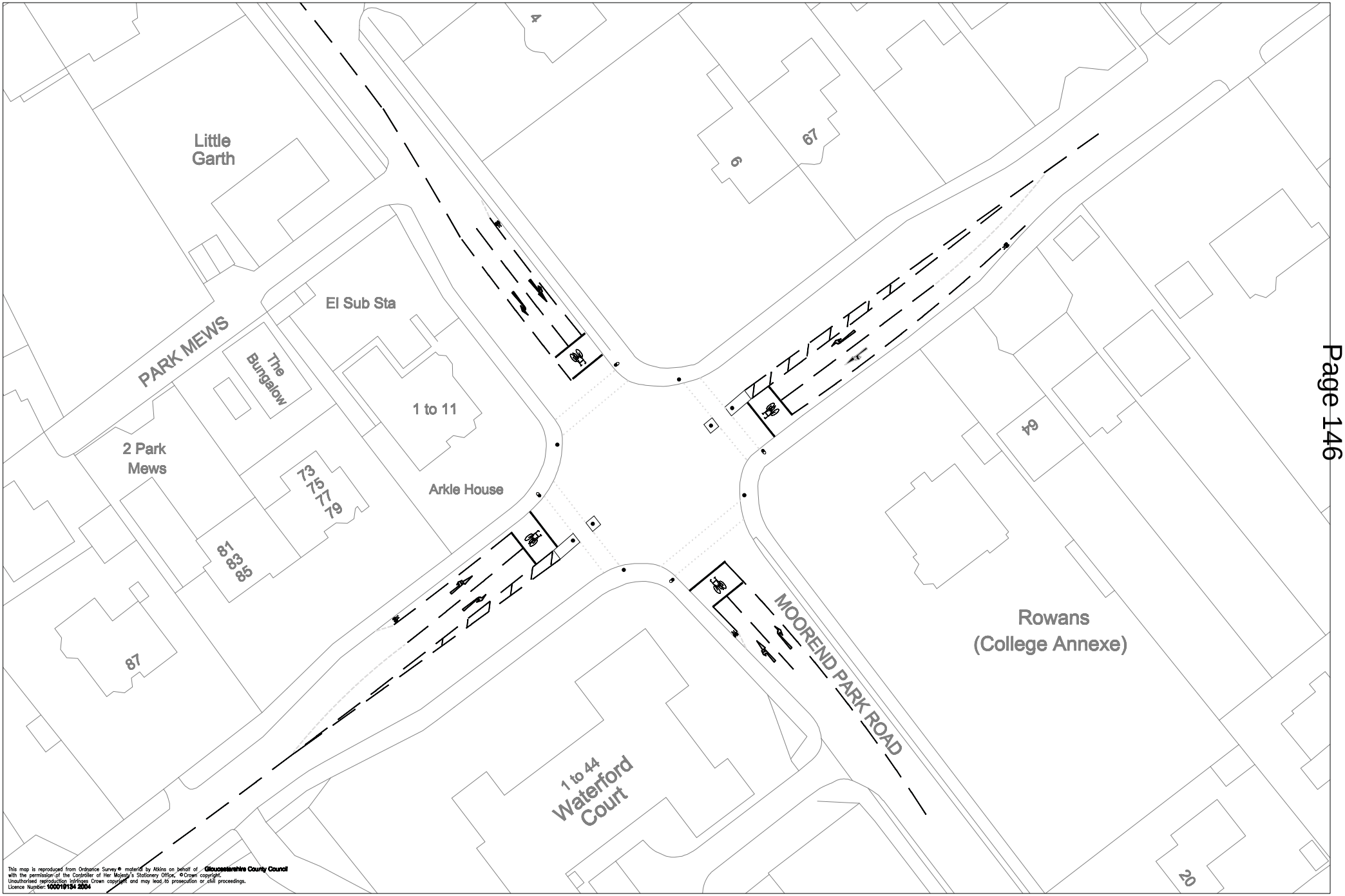
Reason: To provide safe access to site during the construction period

7). No works shall commence on site until details of cycle signage, and non motorised highway improvements, to enable resident and employees of the development to safely access nearest facilities, have been submitted to and agreed in writing by the local planning authority, the approved works shall then be completed prior to any occupations of any proposed dwelling or unit, and shall be retained as such thereafter until and unless adopted as highway maintainable at public expense

Reason: To mitigate the impact of the development in accordance with paragraph 32 of the NPPF.

Informative(s)

1. The proposed development will require works to be carried out on the public highway and the Applicant/Developer is required to enter into a legally binding Highway Works Agreement (including an appropriate bond) with the Local Highway Authority before commencing works on the development.


Little Garth
4
6
67
El Sub Sta
PARK MEWS
The Bungalow
1 to 11
2 Park Mews
73
75
77
79
Arkle House
81
83
85
87
64
MOOREND PARK ROAD
Rowans
(College Annexe)
1 to 44
Waterford Court
20
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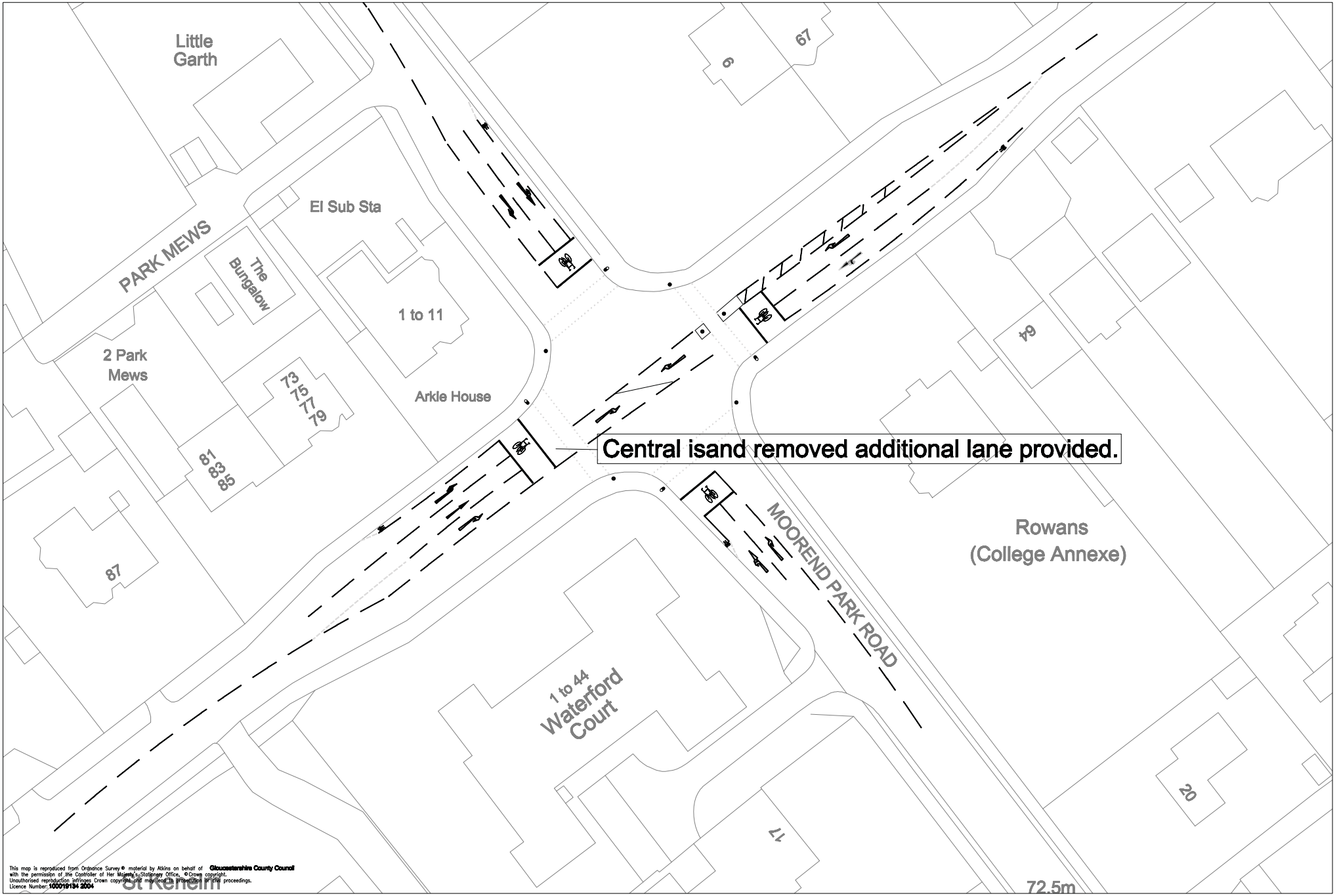
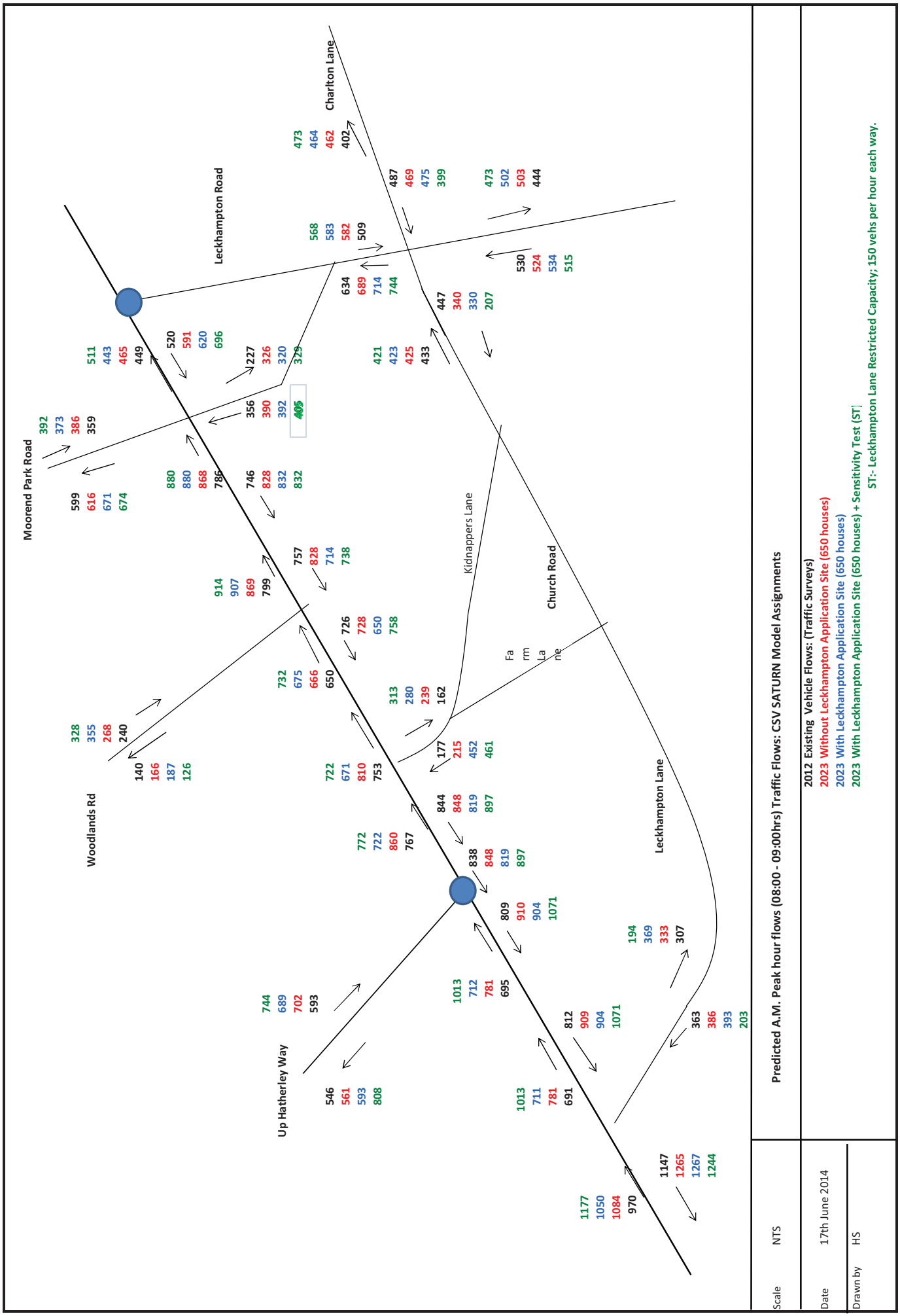
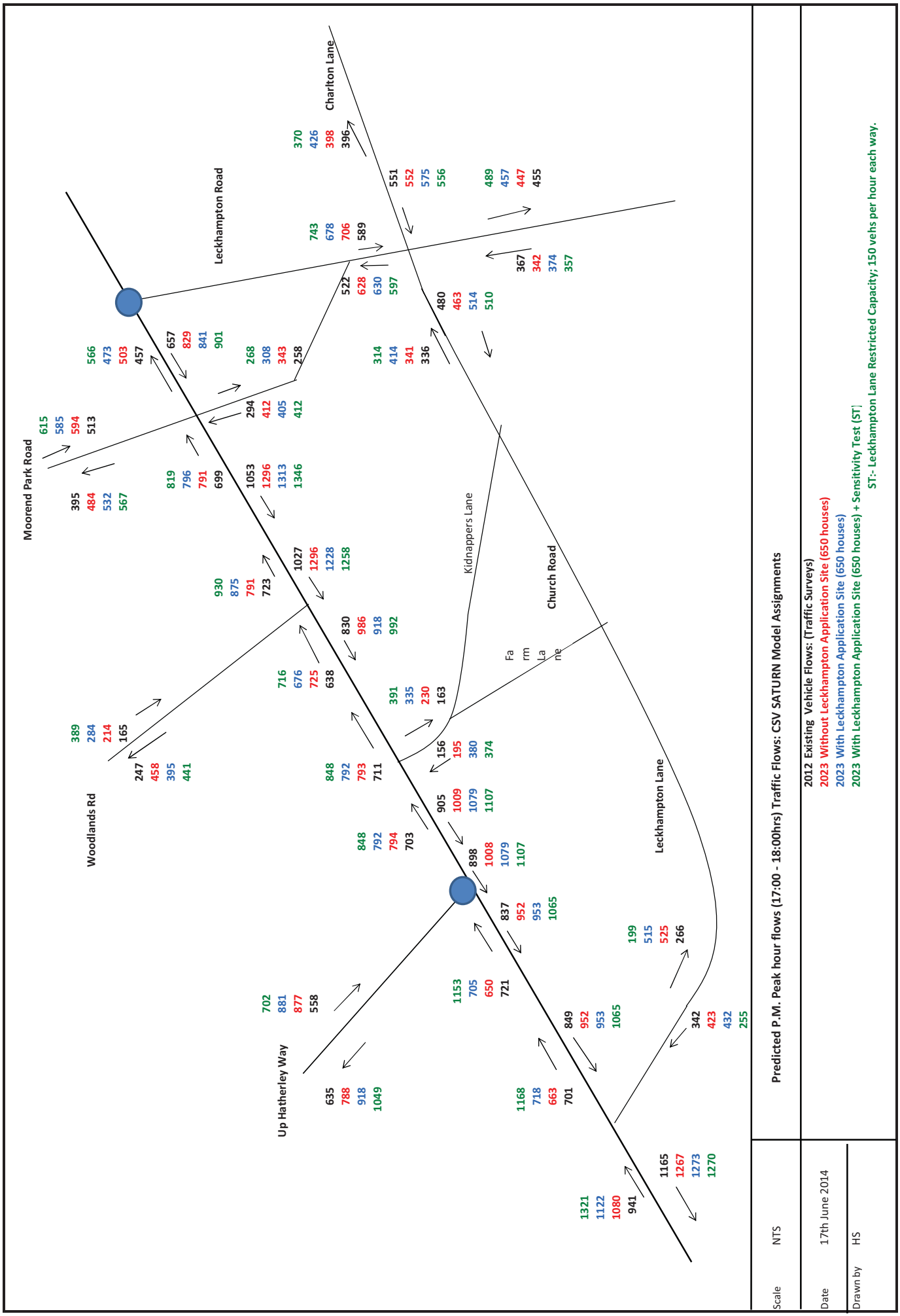
OS Base 1:250



Option-1 Improvement A46 West Approach 1:250


Moorend Park Road
Leckhampton Road
Charlton Lane
Woodlands Rd
Kidnappers Lane
Church Road
Farm Lane
Leckhampton Lane
Up Hatherley Way
Scale NTS
Date 17th June 2014
Drawn by HS
Predicted A.M. Peak hour flows (08:00 - 09:00hrs) Traffic Flows: CSV SATURN Model Assignments
2012 Existing Vehicle Flows: (Traffic Surveys)
2023 Without Leckhampton Application Site (650 houses)
2023 With Leckhampton Application Site (650 houses)
2023 With Leckhampton Application Site (650 houses) + Sensitivity Test (ST)
ST:- Leckhampton Lane Restricted Capacity; 150 vehs per hour each way.



Predicted P.M. Peak hour flows (17:00 - 18:00hrs) Traffic Flows: CSV SATURN Model Assignments

2012 Existing Vehicle Flows: (Traffic Surveys)
2023 Without Leckhampton Application Site (650 houses)
2023 With Leckhampton Application Site (650 houses)
2023 With Leckhampton Application Site (650 houses) + Sensitivity Test (ST)
ST:- Leckhampton Lane Restricted Capacity; 150 vehs per hour each way.

Scale NTS
Date 17th June 2014
Drawn by HS

Deputy Chief Executive's Unit
Rachel North
Deputy Chief Executive

Tewkesbury Borough Council

Mr C Hemphill
Planning and Environment
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
GL50 9SA

BUILT
Recd 23 DEC 2013
ENVIRONMENT

Please Contact: Oliver Rider
Telephone Direct: 01684 272106
Your ref: 13/01605/OUT
Our ref:
Email: oliver.rider@tewkesbury.gov.uk

19th December 2013

Dear Mr Hemphill

RE: Planning application consultation for Land at Leckhampton, South Cheltenham

Thank you for inviting Tewkesbury Borough Council to comment on the above planning application as an adjacent Authority. The application was considered by the Borough Planning Committee on the 10th December 2013 where the attached report was presented.

At the Planning Committee meeting Members agreed to the recommendations contained within the report, which are repeated below for your information:

1. Tewkesbury Borough Council supports, in principle, the location of this site as a strategic location for development.

2. The current proposal has the potential to prejudice the proper and comprehensive planning of the area by allowing development to come forward in a piecemeal manner rather than in co-operation with, and supported by, a wider development strategy. Cheltenham Borough Council should therefore ensure that appropriate mechanisms are put in place to ensure that the proper planning of the area through the comprehensive development of this site is not prejudiced.

3. The comments set out in Section 4.2 of this report should also be taken into account in the consideration of the planning application.

I trust that the contents of this letter and associated report will be considered in the determination of this planning application.

Yours sincerely

Senior Planning Officer
For the Development Manager

TEWKESBURY BOROUGH COUNCIL

Report to:	Planning Committee
Date of Meeting:	10 December 2013
Subject:	Planning Consultation from Cheltenham Borough Council – Land at Leckhampton, Shurdington Road, Cheltenham.
Description of Development:	Residential development of up to 650 dwellings; mixed use local centre comprising Class A1 local convenience and retail units; Class D1 use GP surgery, and up to 4,500sqm of additional floorspace to comprise uses within Classes A, B1 offices, C2 care home, and D1 uses (potentially including dentist practice, children's day nursery and/or cottage hospital); a primary school; strategic open space, landscaping and other associated works and roads.
Report of:	Julie Wood, Group Manager Development Services
Lead Member:	Councillor D M M Davies
Number of Appendices:	Two

Executive Summary:

A planning application has been submitted to Cheltenham Borough Council for a mixed use development, including the provision of up to 650 dwellings and a mixed use local centre at Leckhampton, South Cheltenham. The site directly abuts the boundary of Tewkesbury Borough and the Council has therefore been duly consulted on the application as a neighbouring authority. Given the scale of the proposal, and its significance to Tewkesbury Borough, it is considered that Member approval should be sought prior to providing a response.

Recommendation:

That Members RESOLVE to comment on the South Cheltenham planning application consultation as follows:

1. **Tewkesbury Borough Council supports, in principle, the location of this site as a strategic location for development.**
2. **The current proposal has the potential to prejudice the proper and comprehensive planning of the area by allowing development to come forward in a piecemeal manner rather than in co-operation with, and supported by, a wider development strategy. Cheltenham Borough Council should therefore ensure that appropriate mechanisms are put in place to ensure that the proper planning of the area through the comprehensive development of this site is not prejudiced.**
3. **The comments set out in Section 4.2 of this report also be taken into account in the consideration of the planning application.**

Reasons for Recommendation:
To provide Tewkesbury Borough Council's consultation response to Cheltenham Borough Council for the proposed mixed use development at Leckhampton, South Cheltenham.

Resource Implications:
None.
Legal Implications:
None.
Risk Management Implications:
None.
Performance Management Follow-up:
None.
Environmental Implications:
As set out in the report.

1.0 INTRODUCTION

1.1 An outline planning application has been submitted to Cheltenham Borough Council for a mixed use development, including the provision of up to 650 dwellings and a mixed use local centre at Leckhampton, South Cheltenham. The site is being promoted as part of a wider development constituting an urban extension to the south of Cheltenham. The site directly abuts the boundary of Tewkesbury Borough and the Council has duly been consulted as a neighbouring authority.

1.2 The site extends a total of 33.44 hectares and is located to the south west of Cheltenham Town Centre and to the west of Leckhampton. The site lies outside the Green Belt and the Cotswolds Area of Outstanding Natural Beauty (AONB). The Hatherley Brook runs through the middle of the site from south to north, and unnamed watercourses also run along the western and eastern boundaries from south to north. A number of mature trees, hedgerows and public rights of way also run through the site. The A46 bounds the site to the north west.

1.3 There are many issues for Cheltenham Borough Council to consider in determining this application. Officers consider that, as a consultee, it is only appropriate that the Council make representations based on the impact of the proposal on Tewkesbury Borough. With this in mind, it is considered necessary to focus on the principle of the development, its timing, and the impact it could have on the ability to deliver a comprehensive wider development strategy for the area.

2.0 THE PROPOSAL

2.1 The application seeks outline planning permission for a mixed use scheme comprising residential development of up to 650 dwellings; a local centre; a primary school, affordable housing and areas of strategic open space, landscaping and other associated works and roads. The proposed local centre would comprise local convenience and retail units, a GP surgery and up to 4,500sqm of additional commercial/community uses.

2.2 The application has been submitted in outline form, although the proposed means of access is to be dealt with at this stage. The proposed access arrangements include the provision of two new access points off Shurdington Road (including the relocation of the existing Kidnappers Lane junction) and three off Kidnappers Lane. Although the remaining matters of layout, scale, appearance and landscaping are reserved for future consideration, a series of indicative Masterplans have been provided, which indicate the likely characteristics of the development.

2.3 The application has also been accompanied by an Environmental Statement as required under the Town and County Planning (Environmental Impact Assessment) (England) Regulations 2011. The Environmental Statement assesses the impacts of the development and mitigation proposals in relating to: socio economic factors, landscape and visual amenity, archaeology and cultural heritage; ecology and nature conservation; transport, noise and air quality.

3.0 POLICY CONTEXT

3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Following the revocation of Regional Strategies and Structure Plans, the Development Plan for this planning application comprises the Cheltenham Borough Local Plan Second Review (adopted July 2006).

3.2 It will be for Cheltenham Borough Council to determine whether the proposal accords with the Development Plan or not; and to what degree other material considerations have an impact on the decision-making process. Other material policy considerations in this case will include the NPPF and the emerging Cheltenham, Tewkesbury and Gloucester Joint Core Strategy (JCS).

3.3 <u>The NPPF</u>

3.3.1 In March 2012, the Government published the NPPF, which sets out a presumption in favour of sustainable development. The NPPF states that development proposals that accord with the development plan should be approved without delay. In other cases, *"where the development plan is absent, silent or relevant policies are out of date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the polices in the Framework taken as a whole; or where specific policies in the Framework indicate development should be restricted".*

3.3.2 There are three dimensions to sustainable development: economic, social and environmental. In essence, the economic role should contribute to building a strong, responsive and competitive economy; the social role should support strong, vibrant and healthy communities; and the environmental role should contribute to protecting and enhancing our natural, built and historic environment. These roles should not be undertaken in isolation, because they are mutually dependant.

3.3.3 Paragraph 49 of the NPPF sets out that applications for housing should be considered in the context of the presumption in favour of sustainable development and that relevant

policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites. It will be for Cheltenham Borough Council to determine whether they consider that they have an up to date five-year housing land supply in accordance with the NPPF and the implications this has on their housing policies.

3.4 The Emerging Joint Core Strategy

3.4.1 Tewkesbury, Cheltenham and Gloucester Councils continue to work in partnership in preparing a Joint Core Strategy (JCS), which will provide the strategic policy for development across the three administrative areas until 2031. The Draft JCS is currently the subject of public consultation and will gain further weight as it continues through the plan making process.

3.4.2 The Draft JCS plans for 33,200 homes to be delivered over the plan period from 2011-2031. This results in a requirement for Cheltenham Borough to deliver 10,000 dwellings over the JCS plan period, a requirement for 500 dwellings annually. The Draft JCS proposes an urban extension to the South of Cheltenham at Leckhampton (Policy A6), which encompasses land within both Cheltenham and Tewkesbury Borough' administrative areas, and aims to ensure that development is brought forward as part of a comprehensive scheme of development.

4.0 CONSIDERATION OF THE PLANNING PROPOSAL

4.1 Principle of Development

4.1.1 The current application comprises one of three parcels of land, in separate ownership, that are proposed within the emerging JCS as an urban extension at Leckhampton. The site is located outside the Green Belt and Cotswold AONB, although it is noted that it abuts the AONB boundary. This strategic allocation would form a significant part of Cheltenham Borough's housing land supply over the JCS plan period, and the JCS evidence base indicates that it would be a suitable location for a strategic urban extension. As such, it is considered that, in principle, the location of this site as a strategic location for development is acceptable having regard to the emerging planning policy for the area.

4.1.2 However, the current application does not include all of the land within the Draft JCS allocation. The part of the allocation at Farm Lane, within Tewkesbury Borough, is not included within this proposal. This land is currently allocated by the Tewkesbury Borough Local Plan to 2011, under Policy SD2, for the development of approximately 360 dwellings as part of a wider comprehensive development at South Cheltenham.

4.1.3 Similarly, Policy A6 of the Draft JCS aims to ensure that development of land at South Cheltenham is bought forward as a comprehensive scheme of development, to ensure that it can deliver an integrated form of development that provides good quality layout and design, and the required level of physical and social infrastructure.

4.1.4 Members will recall that a previous planning application for a development of 360 dwellings on the land at Farm Lane was dismissed on appeal in March 2009, where the Secretary of State agreed with the Council that allowing a piecemeal development of the land would be likely to prejudice the comprehensive development of the proposed urban extension and especially the infrastructure necessary to achieve a high quality development.

4.1.5 It is noted that the current application seeks to address the infrastructure requirements for the whole of the proposed allocation in order to bring their parcel of land forward, including a site for a primary school, a doctor's surgery and local transport improvements. However, it remains to be seen if the applicants are able to demonstrate how the scheme can form a comprehensive urban extension without the co-operation of the other land owners.

4.1.6 It would clearly be preferable for development at this location to be presented to Cheltenham and Tewkesbury Borough Councils as a comprehensive scheme rather than in a piecemeal way, which has the potential to prejudice the proper and comprehensive planning of the area. However, in the event that Cheltenham Borough Council is supportive of the principle of this development they should ensure that appropriate mechanisms are put in place to ensure that the comprehensive development of this area is not prejudiced.

4.2 Other Environmental and Social Planning Considerations

4.2.1 *Masterplanning and Landscape Impact* - It is noted that the planning application has been submitted in outline form. However, particular importance should be attached to the visual impact of the proposed development on the landscape, especially given its siting abutting the Cotswolds AONB. The masterplan generally appears to respond well to the key site constraints, and to the key structural landscape features such as the watercourses running through the site. The utilisation of the brook corridors as 'green fingers' is specifically regarded as a positive design feature, as is the provision of a fragmented edge abutting the AONB.

4.2.2 In determining the application, Cheltenham Borough Council will need to be convinced that the proposals are underpinned by a strong and ambitious vision for the architecture, urban design and landscape design of the development. In addition, it will need to be ensured that appropriate connectivity and integration is made with existing and future neighbouring parts of the development, including the Farm Lane site.

4.2.3 *Transport* – It is understood that the Local Highways Authority has raised a number of concerns to the proposal in its current form. In response, it is understood that the applicants are currently carrying out further transport modelling work, which will be submitted to Cheltenham Borough Council as an Addendum to the Environmental Statement in due course. The Highways Agency and the Local Highways Authority will need to be satisfied that the development provides an acceptable level of new and improved infrastructure to mitigate the impact on the strategic and local highways networks respectively.

4.2.4 *Flood Risk* – The application has been accompanied by a detailed Flood Risk Assessment, which confirms that the applicants have carried out detailed flood modelling of the watercourses on the site. It is noted that the majority of the site is located within Flood Zone 1 (low risk), although a small area to the north of the site falls within the modelled Flood Zone 2 areas (medium risk). The NPPF and its associated Technical Guidance seek to steer new development to Flood Zone 1.

4.2.5 It is understood that the proposal would include a small amount of housing within the modelled Flood Zone 2 area. Whilst it is understood that the proposal includes mitigation works that would effectively remove this land from Flood Zone 2, the land is still at this stage within a medium risk flood area. As such, the Sequential Test should be applied as set out in the NPPF, which would need to demonstrate why all the required housing could not be located within Flood Zone 1.

4.2.6 *Gypsy and Traveller provision* - Policy C4 of the Draft JCS requires the provision of new gypsy, traveller and travelling showpeople sites to be considered as part of urban extensions and strategic allocations. There does not appear to be any provision for such accommodation, which is a key local planning requirement.

4.2.7 *Other Environmental Matters* – Cheltenham Borough Council will need to ensure that appropriate assessments have been carried out in relation to archaeology, ecology, noise and air quality. Appropriate mitigation measures should be put in place to address any identified adverse impacts to ensure that the development has an acceptable impact on the environment in accordance with national and local planning policy.

4.2.8 In addition, measures should be put in place to secure high levels of energy efficiency with the development in order to improve its sustainability benefits. It is recommended that consideration be given to constructing dwellings to Code Level 4 under the Code for Sustainable Homes, and non-domestic buildings should aim to be constructed to at least a 'Very Good' rating under BREEAM standards. Cheltenham Borough Council should also seek to secure a development where at least 10% of the energy supply arising from it be secured from decentralised and renewable or low carbon energy sources.

4.2.9 *Social Infrastructure* – The latest Gloucestershire Housing Needs Assessment demonstrates a need for 40% affordable housing in this location. In order to meet the specified needs it is considered that 70% of affordable units should be rented accommodation and 30% shared ownership. All affordable housing should meet minimum internal floor area size measurements, design and quality standards as described by the Homes And Communities Agency.

4.2.10 It is understood that the development provides for a new on-site primary school, which would provide for the number of primary school pupils that a development of this scale would be likely to generate. In addition, it will need to be ensured that such infrastructure is of a size and nature that can accommodate additional housing that may come forward in the area, so as not to prejudice the proper and comprehensive planning of the area. Furthermore, Cheltenham Borough Council will need to secure off-site contributions towards improving existing local secondary schools. Contributions towards improving existing library facilities should be sought. Cheltenham Borough Council will also need to be satisfied that the development provides for an appropriate level of onsite public open space, including sports pitches and children's play areas.

5.0 CONCLUSIONS

5.1 In light of the above, it is recommended that Members resolve to support, in principle, the location of this site as a strategic location for development.

5.2 Cheltenham Borough Council should ensure that appropriate mechanisms are put in place to ensure that the proper planning of the area through the comprehensive development of this site is not prejudiced. In addition, the comments set out in Section 4.2 of this report should be taken into account in determining this planning application.

6.0 CONSULTATION

6.1 As the Authority determining the application, Cheltenham Borough Council has consulted all statutory bodies and other interested parties, including Tewkesbury Borough Council and local Parish Councils. The application has been advertised in the Gloucestershire Echo and site notices have been displayed in the area advising local residents of the application.

7.0 RELEVANT TEWKESBURY BOROUGH COUNCIL POLICIES/STRATEGIES

7.1 Tewkesbury Borough Local Plan to 2011 – March 2006.

Emerging Joint Core Strategy.

Emerging Tewkesbury Borough Plan.

8.0 RELEVANT GOVERNMENT LEGISLATION/POLICIES

8.1 The Planning and Compulsory Purchase Act 2004.

The National Planning Policy Framework (NPPF).

9.0 RESOURCE IMPLICATIONS (Human/Property)

9.1 None.

10.0 SUSTAINABILITY IMPLICATIONS (Social/Community Safety/Cultural/ Economic/ Environment)

10.1 As set out in the report.

11.0 IMPACT UPON (Value For Money/Equalities/E-Government/Human Rights/Health And Safety)

11.1 None arising from this report.

12.0 RELATED DECISIONS AND ANY OTHER RELEVANT FACTS

12.1 None.

Background Papers: The Draft Joint Core Strategy (October 2013)

Contact Officer: Oliver Rider; Senior Planning Officer

Email: oliver.rider@tewkesbury.gov.uk

Appendices:
1. Proposed Masterplan Documents.
2. Non-Technical Summary of the Environmental Statement.

Planning application Ref: 13/01695/OUT
Proposal: Mixed development
Location: Shurdington Road, Leckhampton, Cheltenham

Response of the Cotswolds Conservation Board

The Cotswolds Conservation Board ('the Board') was established by Parliament in 2004.

The Board has two statutory purposes[1]:
a) to conserve and enhance the natural beauty of the AONB; and
b) To increase the understanding and enjoyment of the special qualities of the AONB.

In fulfilling these roles, the Board has a duty to seek to foster the economic and social well-being of people living in the AONB.

1. The Board is of the view that the proposal lies within the setting of the Cotswolds AONB and significantly impacts upon one of the special qualities of the AONB as identified in the Cotswolds AONB Management Plan 2013-18[2]:

   "The Cotswolds escarpment, including views to and from it."

2. The Board therefore strongly supports the views of Natural England (NE) regarding this impact and potential cumulative impacts as set out in their letter dated 25th October 2013.

3. The Board notes that the applicant's Planning statement paragraph 4.5 suggests that "The NPPF does not contain policies that indicate development in this location should be restricted" and therefore implies that footnote 9 to paragraph 14 of the NPPF does not have to be considered in relation to this application.

4. The applicants Planning Statement contains no reference to paragraph 115 of the NPPF:

"115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty..."

5. The purpose of designation of AONBs is to conserve and enhance the natural beauty of the area. (Section 82(1) Countryside and Rights of Way Act 2000.)

6. Natural England is the government body responsible for advising the government regarding the designation of landscapes (AONBs and National Parks). NE has issued "Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England" **(APPENDIX 1)**. Paragraphs 6.1 to 6.12 of the guidance set out the principles of assessing natural beauty and the factors to be considered with respect to a particular area. It is noted in 6.1 that *"Natural beauty is not exhaustively defined in the legislation"*.

[1] Section 87, Countryside and Rights of Way Act 2000, as amended by the NERC Act 2006.
[2] http://www.cotswoldsaonb.org.uk/?page=managementplan

7. A factor identified in the guidance relating to landscape quality is "scenic quality" (Table 3 *Factors related to Natural Beauty - page 13).*

8. It is clear therefore that the conservation and enhancement of the scenic quality of a designated area is part of the purpose of designation, and that a designated area is judged to have scenic quality.

9. The scenic quality of a designated landscape can be appreciated visually both from within the area and from outside it. Therefore proposals which potentially affect the appreciation of the scenic quality of the AONB have to be judged against the constraining affect of NPPF 115. This is the case here, contrary to the applicants Planning Statement.

10. The issue of the importance of the retention of views of the Cotswold escarpment was considered by the Planning Inspector with respect to appeal reference APP/G1630/A/12/2183317, a copy of which is attached to this response. **(APPENDIX 2)**

11. Paragraph 29 of that decision states:

"29. In views towards the AONB the visual effect of the development on Site A would be much more pronounced. This is due to the prominence of the topography and the construction of the housing on the elevated part of the site. At present Mount View Drive appears as two parallel rows of houses on the western side of Gretton Road. Whilst this development seems to me to be a highly evident feature it does nestle into its setting and the upper slopes of Langley Hill rise up behind to form a backdrop. It is the case that the new houses would interrupt that foreground view and be prominent to the observer standing outside the site in Greet Road. Whilst some of the upper slopes would be apparent the context of the rising hillside behind the town would be significantly diminished. **From Gretton Road the situation is likely to be even worse because the observer would find that views towards Salter's Hill and the AONB escarpment on the other side of the valley would be greatly impeded due to the proximity and elevation of the built development. The adverse impacts on the setting of the AONB would be significant.** *[My emboldening]* Whilst these impacts would be confined to limited viewpoints it seems unlikely that they would diminish in time, even with the proposed landscaping."

12. Paragraph 32 of that decision states:

"32. Of greater importance is the harm to the setting of the AONB arising from the housing on the elevated part of Site A. The latter plays a role in providing the foreground setting to Langley Hill within the adjoining AONB with which it shares a number of topographic and landscape features in common. The appeal development would interrupt westerly views thus adversely affecting the setting of the AONB. Furthermore views would be impeded in an easterly direction towards the Cotswold escarpment on the other side of the valley.

These impacts would be limited to those public viewpoints close to the east and west site boundaries. Nevertheless there would be significant harm to the setting of the AONB. *[My emboldening]* This would be contrary to development plan policy, including saved Policies S.6 and NHE.5 in the SP and saved Policy LND2 in the LP.

13. Paragraph 70 of that decision includes:

"...Whilst there would be significant landscape harm and conflict with development plan policy there would also be substantial benefits. Most notably these would include the contribution towards housing land supply in the face of a serious short term deficit."

14. This decision makes clear that the interruption of even very localised views of the AONB can cause significant harm to the setting of the AONB, contrary to Local Plan POLICY CO 2 - DEVELOPMENT WITHIN OR AFFECTING THE AONB

The supporting text to policy CO 2 provides further detail regarding impacts of developments outside but affecting the Cotswolds AONB:

"7.20 The Council confirms its support for these objectives. It considers it particularly important to protect the scarp as the dominant feature of Cheltenham's setting and is concerned at the cumulative effect of even small-scale development and of development in new locations within the AONB. The Public Local Inquiry Inspector took the view that the attractiveness of the scarp and its location on the urban fringe justify a restrictive policy. The Council, therefore, will not permit development which would harm the natural beauty of the landscape.

7.21 Development on sites outside but close to the AONB can also have an impact on its character. Such development should be designed and landscaped to avoid harming the natural beauty of the AONB. Special consideration should be given to the impact of proposals on the setting of the AONB and on views into or out of the area. See also policies CP 3 (sustainable environment) and CO 1 (landscape character)."

15. The Applicants LVIA shows the view currently available from Shurdington Road (viewpoint 5) with the Cotswolds AONB clearly forming an important landscape feature as a backdrop to the site. These views would immediately be blocked by the proposed "Local Centre" of up to 3 storeys in height, and the further areas of residential developments shown on the indicative masterplan both within and outside the application site itself would further interrupt these views.

16. Cotswold Way National Trail

As identified by Natural England the application site is clearly visible from the Cotswold Way National Trail "from locations such as the Devil's Chimney on Leckhampton Hill. The purpose of National Trails is to "offer some of the best walking, riding and cycling experiences in the country, officially designated by Natural England and the Countryside Council for Wales. The 15 Trails are based on the nation's favourite rambles and rides and provide more than

4,000kms (2,500 miles) of well-managed routes across some of our finest countryside."[3]

Summary

The Board supports the contention of Natural England that the proposed development, together with those shown on the indicative masterplan, are likely to have significant adverse effects on the special qualities of the Cotswolds AONB and users of the Cotswold Way National Trail.

[3] http://www.nationaltrail.co.uk/uploads/NE_National%20Trails%20tagged.pdf

Appeal Decision

Inquiry held on 4, 5, 9-11 April 2013
Site visits made on 3 and 11 April 2013

by Christina Downes BSc DipTP MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 14 May 2013

Appeal Ref: APP/G1630/A/12/2183317
Land adj Gretton Road, Winchcombe, Gloucestershire

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for outline planning permission.
- The appeal is made by Redrow Homes Ltd against the decision of Tewkesbury Borough Council.
- The application Ref 12/00464/OUT, is dated 30 April 2012.
- The development proposed is residential development of up to 120 dwellings, vehicular access from Gretton Road, public open space, facilities for sport and recreation and other associated infrastructure.

Decision

1. The appeal is allowed and outline planning permission is granted for residential development of up to 120 dwellings, vehicular access from Gretton Road, public open space, facilities for sport and recreation and other associated infrastructure on land adjacent to Gretton Road, Winchcombe in accordance with the terms of the application, Ref 12/00464/OUT, dated 30 April 2012, and the plans submitted with it, subject to the conditions on the Schedule at the end of this decision.

Procedural Matters

2. The Inquiry was originally intended to consider a second appeal proposal by Bloor Homes for 92 dwellings on land at Greet Road. However, following the submission of a new scheme with additional landscape information, planning permission was granted for that development and the appeal was withdrawn.

3. The proposal is in outline form with only access to be considered at this stage. The Council indicated that it would have refused planning permission had it been in a position to do so for nine reasons. Six of these related to the lack of provision for affordable housing, open space, education and other infrastructure. The Council is however satisfied that these matters have been addressed through the Planning Obligations by Agreement. These are considered later in the decision. The other putative reasons for refusal concerned the location outside the settlement boundary, the harm to the character and appearance of the landscape and the unsatisfactory nature of the form and layout relative to the prevalent urban morphology of the area.

4. The site comprises two parcels of land. The housing and open space proposal would occupy land between Gretton Road and Greet Road (Site A). The

proposed sport and recreation use would be on land to the east of Greet Road, north of Winchcombe School (Site B).

Reasons

Whether the proposal is needed to meet the housing requirements of the borough and contribute to the short term housing land supply deficit

5. The development plan currently comprises the Regional Planning Guidance for the South West (RPG10), the saved policies in the Gloucestershire Structure Plan Second Review (SP) and the saved policies in the Tewkesbury Borough Local Plan (LP). RPG10 was in the process of being reviewed and this had reached an advanced stage following an Examination in Public and proposed changes by the Secretary of State. However the proposed changes to the Regional Spatial Strategy for South West England (the draft RS) never progressed further due to the Government's stated intention to abolish regional strategies. The Order was laid before Parliament on 24 April and is due to come into force on 20 May 2013. It should be noted that all saved Structure Plan policies of relevance to this appeal will also be revoked at the same time. Whilst this occurred following the close of the Inquiry the pending revocation was considered by the parties and I am satisfied that there is no need to seek further comments on the matter.

Housing requirement

6. The Council prefers to use the housing target in the SP as the basis for its housing land supply calculations. Although this document is currently the statutory starting point it only covers the period to 2010 and is based on household projections dating back to the mid 1990's. In the circumstances the housing requirement in the SP is out of date and not fit for purpose. Whilst a Joint Core Strategy (JCS) is being prepared by Tewkesbury and Cheltenham Borough Councils and Gloucester City Council this is still at a relatively early pre-submission stage. Despite being commenced some years ago this document is not expected to be adopted until December 2014 at the earliest. Although some objectors considered that the appeal scheme was premature in advance of a settled local policy position, the early stage that the document has reached means that such arguments cannot be supported. The emerging JCS can be afforded little weight at the present time.

7. In the circumstances the most up to date and robust housing requirement is provided by the draft RS rather than the SP. The Secretary of State reached a similar conclusion in the recent appeal decision relating to Highfield Farm, Tetbury. Whilst this concerned a different local planning authority, the SP and the draft RS were the same as in the current appeal. The Framework requires an additional buffer of 5% or 20% to be moved forward in the housing trajectory in order to ensure choice and competition in the market for land. In this case the Council considered that a 20% buffer should be added to reflect the persistent under delivery of housing.

Housing supply

8. The main parties disagreed about the deliverability of some of the housing sites. However it is unnecessary to explore this further because even on the Council's assessment there would be a shortfall of 2,912 dwellings and a supply of only 2.7 years. The Secretary of State when granting planning permission for housing development at Bishop's Cleeve referred to the "pressing need" for

additional housing within Tewkesbury Borough in his decision. The shortfall referred to above takes account of the houses that would be delivered as a result of that decision and also the Bloor Homes planning permission.

9. The spatial strategy in the draft RS, which appears likely to be carried forward in the emerging JCS, is to concentrate housing within sustainable urban extensions around Gloucester and Cheltenham, including Bishop's Cleeve. However there is also a requirement for 2,900 houses in the "rest of Tewkesbury", which includes Winchcombe and Tewkesbury. Aside from the latter, in the 2011 audit of rural settlements undertaken as part of the evidence base for the JCS, the town was ranked second in terms of the overall level of services that it offers and its accessibility. Even on the basis of the whole borough, including Bishop's Cleeve, it was ranked fourth on this basis. The approval of the Bloor Homes development shows that the Council recognises Winchcombe as a sustainable settlement where further development can take place to contribute to the housing shortfall. Furthermore it has acknowledged in its Committee Report that the scale of the appeal proposal would not be prejudicial to the spatial strategy in the emerging JCS.

10. The appeal site is outside the current development boundary for Winchcombe. The proposal would thus not comply with saved LP Policy HOU4 which restricts new housing to limited purposes relating to affordable housing and rural activities. However Paragraph 49 of the Framework makes clear that where a 5 year supply of deliverable sites cannot be demonstrated, housing supply policies should not be considered up to date. It is clear that the Council will not be able to meet its housing commitments without breaching Policy HOU4 and this policy should not therefore be considered as a constraint. Insofar as saved Policies H.6 and S.4 in the SP seek to restrict housing development outside of rural settlements they should not be considered up to date either.

11. There was no dispute that the new houses could be ready for occupation within the next 5 years. Although the Bloor Homes development would add further homes to the local housing market within a similar time period there was no evidence that this would significantly slow down delivery on the appeal site. The Appellant indicated that there would be no objection to a foreshortening of the implementation period to ensure an expeditious start.

12. Winchcombe is undertaking a Neighbourhood Plan and it is creditable that local people involved with this plan are seeking to be pro-active with regards to future development, including the provision of housing and employment. I can understand their concerns that local choices could be limited if the appeal scheme goes ahead, especially in view of the recent Bloor Homes permission. Those involved in its production indicated that they would wish to see an organic growth of the town involving a number of small scale housing developments. This is in line with the *Winchcombe Town Design Statement*, which envisaged infill developments to meet local housing needs. However, notwithstanding the considerable amount of work that has already been done, the Neighbourhood Plan is still at a very early stage. It has not yet reached any consensus with regard to strategy or policy and can have very little weight as a material consideration at the present time.

Conclusions

13. Drawing together the above points, the appeal proposal is needed to meet the housing requirements of the Borough. Winchcombe is recognised as a

sustainable settlement where further housing development can be expected to take place. The scale of the deficit means that this is likely to occur on sites outside the current development boundary and that saved SP Policies H.6 and S.4 and saved Policy HOU4 in the LP are now out of date in this respect. In his decision, the Secretary of State commented that other than allowing the Bishop's Cleeve appeals there was no other credible way of reducing the 5 year housing land deficit. The same could be said in respect of the appeal scheme. Apart from mention by the Town Council of a proposal for more houses at Brockworth there was no evidence that any significant provision was in the pipeline elsewhere in the borough. Other objectors mentioned that sufficient brownfield land was available but there was no firm evidence that this is the case. The effect on the landscape will be considered under the next issue but the contribution that the scheme would make to help address the serious short term housing land supply deficit in Tewkesbury Borough is an important material consideration in its favour.

The effect of the proposal on the rural character of the area which is designated as a Special Landscape Area (SLA) and provides the setting for the Cotswolds Area of Outstanding Natural Beauty (AONB)

14. The planning application was accompanied by a Landscape and Visual Impact Assessment (LVIA). The Council also undertook its own LVIA for the purposes of the appeal. The methodology used in these assessments was based on the *Guidelines for Landscape and Visual Impact Assessment: Second Edition* and has not been challenged. The viewpoints within the Appellant's LVIA were agreed in advance by the Council. I visited most of these during my site visits, including seeing the site from the Gloucestershire Way, the Cotswold Way and the Wychavon Way within the AONB. I also saw the land from more local viewpoints within the SLA, including the approaches along both of the adjoining roads. I have taken all of this information into account in reaching my conclusions along with the oral and written landscape evidence to the Inquiry.

Policy context

15. There are several saved policies in the SP that seek to safeguard the quality of the landscape and the setting of settlements. Of particular relevance is saved Policy NHE.5 in the SP, which indicates that provision should not be made for development that would detract from the particular landscape qualities and character of the SLA. In the LP, saved Policy LND2 requires special attention to be paid to the protection and enhancement of the special landscape character of the SLA, which is of local significance. The supporting text explains that whilst the quality of the landscape is worthy of protection in its own right it also plays a role in providing the foreground setting for the adjacent AONB.

16. The Framework recognises the need to conserve and enhance the natural environment as a core planning principle. It also indicates that policies should set criteria against which proposals affecting landscape areas will be judged. The protection of designated sites should be commensurate with their status and great weight should be given to conserving the landscape and scenic beauty in AONBs. It seems to me that unlike saved LP Policy LND4, which relates to countryside protection in the non-designated areas, saved Policy LND2 is essentially criteria-based and permissive in its tone. There was some debate about whether the Council had used the policy to constrain the principle of development when considering the planning application. However that is clearly not what it purports to do as the Council accepted at the Inquiry.

Indeed the Bloor Homes site is also within the SLA and the Council clearly thought that the designation was not a barrier to granting planning permission. The correct construction of the policy is not at odds with the Framework, it does not seek to apply AONB controls to the SLA and it should not be considered out of date.

Effect on the morphology of Winchcombe

17. Winchcombe is a small town that has become established on the western side of the River Isbourne. Much of the settlement is on the lower slopes of the valley within the AONB and the remainder lies within the SLA. The town is surrounded by AONB countryside to the east, west and south and by the SLA to the north. Site A comprises farmed land and adjoins the northern boundary of the settlement. Both Site A and B are within the SLA and Site A adjoins the AONB boundary, which runs along Gretton Road at this point.

18. The northern boundary of the settlement is not even. Mount View Drive forms its current limit on the western side of Gretton Road whereas between Greet Road and the River Isbourne it is considerably further south. The Bloor Homes development will move this part of the settlement a little further northwards. The current settlement edge between Greet and Gretton Roads has a harsh appearance. New development to the west of Greet Road appears to have obliterated a stretch of important hedgerow[1] that previously existed near to that boundary and the view is of built development close to the development edge. The development of Site A would continue the pattern of development between the two roads out of the town but would offer the opportunity of a softer landscaped edge to the settlement provided by the field hedge that runs along the northern ridge and is roughly 5 metres high. With augmented planting there would be a considerable improvement to the setting of the town when approaching along either Greet or Gretton Roads from the north.

19. The housing development itself would occupy the western part of Site A. Its eastern boundary would have a diagonal alignment which is dictated by the presence of the subterranean remains of a Roman villa which is a Scheduled Monument (SM). SM Consent was granted in July 2012. One of the Council's concerns is that the proposed development would disrupt the strong rectilinear field pattern that is a particular feature of the area. However there are several instances of development at the edges of the town where the existing hedgelines have not been followed and boundaries are irregular in shape. One example relates to housing adjacent to the River Isbourne where the development edge has clearly been constrained by the need to avoid building on the flood plain. Another example is Mount View Drive which has straight boundaries that do not appear to follow any natural feature.

20. Although the SM is not to be excavated the proposal to include an informal recreation area and wildflower meadow within this part of the site would be beneficial to its protection. The existing ploughing regime has the potential for further damage to the subterranean remains. There would also be the advantage of display boards to allow people to understand a piece of history on their doorstep. If anyone were to question the diagonal alignment of the development boundary it would likely alert them to the archaeological

[1] The importance of the hedgerow is in terms of the Hedgerow Regulations 1977. The site visit revealed that much of the important hedgerow shown as H3 in Document 17 no longer exists.

significance of the site. For all of these reasons it is considered that the form and layout of the appeal development would integrate successfully with the existing urban morphology of the town.

Effect on the SLA landscape

21. The *Gloucestershire Landscape Character Assessment* identifies the SLA as falling within the *Unwooded Vale: Teddington and Greet Vale Character Area*. Features include a relatively sparsely settled open agrarian landscape with rural villages and scattered farms, medium to small scale hedged fields, scarce woodland cover contrasting to the wooded backdrop of the Cotswold escarpments and broadly undulating, gentle or almost flat vale landscape. The character area also includes the northern part of the built up area of Winchcombe as well as other settlements in the SLA, including Greet.

22. Hedgerows enclosing medium sized fields are a defining feature of the character area. The appeal proposal would largely retain the existing well managed hedgerows around the boundaries of both sites and through the centre of Site A. The new housing would however result in a loss of openness which is another important characteristic of the vale landscape. The significance of the hedgerows would be diminished by the loss of the farm land that they enclose. The proposed wildflower meadow on Site A would be an attractive feature but would not be typical of the landscape within this particular character area. This part of the SLA however is affected by a number of urban influences, including the poorly screened and exposed settlement edge that adjoins the southern site boundary of Site A. There is also the substantial spread of school buildings on the eastern side of Greet Road. Whilst these are presently surrounded by farmland this will be replaced by formal playing pitches and housing once the Bloor Homes site is developed. So whilst there would be some adverse impact to the SLA landscape, this would be relatively slight.

23. The western part of Site A is at a higher level and there is a small local ridge near the northern site boundary. Notwithstanding the screening effect of the northern field hedge, the upper parts of the new houses would be seen when approaching along Greet or Gretton Roads towards the town. There would be some visual perception that the gap between Winchcombe and Greet had been diminished. However the existence of the other existing and future development mentioned above renders this impact of limited importance. Site B would remain largely open and reflect other sports uses on adjoining land. Overall, the relatively flat nature of the vale landscape and the prevalence of hedgerows and other vegetation would mean that any adverse visual impacts arising from the appeal proposal on the SLA would be small scale and localised.

24. There is in addition scope for mitigation in the form of additional planting so that over time the built development on Site A would become better integrated with its surroundings. Furthermore there is the opportunity to create a new softer landscaped edge to the town as referred to above. Overall I consider that whilst the appeal development on Site A would have an adverse impact on the character and appearance of the SLA this would be of limited significance, especially in the longer term.

Impact on the setting of the AONB

25. The "setting" of the AONB enjoys no particular protection as a designation in its own right. Nevertheless LP Policy LND2 indicates that the SLA plays a role in providing the foreground setting. The Cotswolds Conservation Board[2] in its Position Statement considers the setting to be the area where development can have a positive or negative impact on the natural beauty and special quality of the AONB. This is also a view endorsed by Natural England. Within the *Cotswolds AONB Landscape Character Assessment* and the associated *Cotswolds AONB Landscape Strategy and Guidelines* the land to the west falls within the *Escarpment Outlier: Langley Hill* character area. The character assessment points out that there is considerable variety within the landscape patterns of the various outliers and that this may even apply to different sides of the same hill. It is therefore relevant to consider whether the appeal site has features in common with the adjoining AONB in order to assess the importance of this part of the SLA in terms of setting.

26. The landscape of the AONB itself would remain unchanged by the development proposal. Nevertheless Site A does share topographic similarities with the AONB as the gradient of the lower slopes of Langley Hill continues east of Gretton Road. Unlike the well tended hedgerows along the other boundaries of Site A, the northern hedgerow is much taller, contains trees and is characteristic of the unmanaged hedges that feature on the adjoining slopes of Langley Hill. There are views across the appeal site towards the AONB in both directions due to its elevated position. This is in contrast to the vale landscape where the much flatter topography, hedgerows and vegetation restricts the line of view. It therefore seems to me that Site A shares a number of landscape characteristics with the AONB landscape of Langley Hill. This seems hardly surprising because the AONB boundary, which was established in 1966 well before the SLA came into being, is not defined by topographic or landscape features but rather by Gretton Road.

27. The AONB is crossed by a number of footpaths and both Site A and Site B can be seen from several elevated viewpoints on Langley Hill as well as from Salter's Hill on the other side of the valley. These are national trails which include the Gloucestershire Way, the Cotswold Way and The Wychavon Way. From these places one gains a clear understanding of the existing settlement pattern which has extended up the lower eastern slopes of Langley Hill within the AONB.

28. Site B would be seen within the context of the adjoining school and its sports fields. The new housing on Site A would be seen as an extension beyond the existing built confines of the town. However this would be within the context of existing development, including Mount View Drive. Furthermore as previously noted the settlement edge extends much further northwards west of Greet Road than east of it. Winchcombe School is also seen as a significant area of development which is level with the northern site boundary. Although at present I would agree it is distanced from the settlement edge this will become much less apparent when the Bloor Homes development is built. In any event from these elevated viewpoints within the AONB there is the mitigating effect

[2] The Cotswolds Conservation Board was set up by Parliament to conserve and enhance the natural beauty of the Cotswolds AONB and increase awareness and understanding of its special qualities.

of distance. The existing sense of tranquillity that people enjoy when using these footpaths would not significantly change. Taking all of this into account I consider that the impact on views out of the AONB would be insignificant.

29. In views towards the AONB the visual effect of the development on Site A would be much more pronounced. This is due to the prominence of the topography and the construction of the housing on the elevated part of the site. At present Mount View Drive appears as two parallel rows of houses on the western side of Gretton Road. Whilst this development seems to me to be a highly evident feature it does nestle into its setting and the upper slopes of Langley Hill rise up behind to form a backdrop. It is the case that the new houses would interrupt that foreground view and be prominent to the observer standing outside the site in Greet Road. Whilst some of the upper slopes would be apparent the context of the rising hillside behind the town would be significantly diminished. From Gretton Road the situation is likely to be even worse because the observer would find that views towards Salter's Hill and the AONB escarpment on the other side of the valley would be greatly impeded due to the proximity and elevation of the built development. The adverse impacts on the setting of the AONB would be significant. Whilst these impacts would be confined to limited viewpoints it seems unlikely that they would diminish in time, even with the proposed landscaping.

Conclusions

30. In reaching my conclusions I have had regard to the Local Plan Inspector's views that the development of this land would be prominent and harmful both from the elevated viewpoints of the AONB and from Greet and Gretton Roads. She was also concerned about coalescence between Winchcombe and Greet. Whilst the landscape clearly has not changed since she made her assessment there has been further development within the last 10 years and changes to the settlement edge, including the construction of Mount View Drive and the permission for 92 dwellings on the Bloor Homes land. The Inspector was also of course making her comments under a totally different national planning policy regime and within the context of there being alternative housing land available to meet housing requirements to 2011. It is relevant to note that the Bloor Homes land was not favoured for housing development either.

31. The appeal proposal would extend built development beyond the settlement edge resulting in a loss of countryside. However this in itself is not a bar to development in a situation where the development plan policies relating to the supply of housing are now out of date. Saved Policy LND2 does not prohibit housing development within the SLA in principle. There would be an adverse impact on the character of the SLA landscape itself but this would be localised and should be set against the benefits in terms of the provision of a softer settlement edge.

32. Of greater importance is the harm to the setting of the AONB arising from the housing on the elevated part of Site A. The latter plays a role in providing the foreground setting to Langley Hill within the adjoining AONB with which it shares a number of topographic and landscape features in common. The appeal development would interrupt westerly views thus adversely affecting the setting of the AONB. Furthermore views would be impeded in an easterly direction towards the Cotswold escarpment on the other side of the valley. These impacts would be limited to those public viewpoints close to the east and west site boundaries. Nevertheless there would be significant harm to the

setting of the AONB. This would be contrary to development plan policy, including saved Policies S.6 and NHE.5 in the SP and saved Policy LND2 in the LP.

Other Matters

Affordable housing

33. There is no dispute that within the borough there is a substantial undersupply of affordable housing. It is the case that within Winchcombe there have been several affordable housing schemes, including Mount View Drive. The Parish Housing Needs Survey of February 2012 indicates that 40 households with a local connection were in need of affordable housing. Most of these would be accommodated by the Bloor Homes scheme where 32 affordable homes would be built. However this does not mean that there is no further requirement for affordable housing within this area. Whilst locally derived needs should be met first, there are also many nearby parishes for which Winchcombe would be the nearest and most sustainable location in which to live. Furthermore the severe deficit that exists in the borough as a whole cannot be ignored. I was told that 129 households had specified Winchcombe as their preferred choice and that 75 of those have a proven local connection.

34. Saved Policy HOU13 in the LP seeks to negotiate appropriate levels of affordable housing although there is no development plan policy that is specific about level or mix. The proposal is for 35% provision with a mix of social rent, affordable rent and intermediate housing. The Council is satisfied that the quantum and mix would be acceptable to address current housing needs. The Planning Obligation includes the mechanism for provision and this is tied to the occupation of the market dwellings.

Congestion and highway safety

35. The Town Council and many local residents were concerned about the increase in traffic on local roads, including within Winchcombe itself which is a historic centre with narrow streets and tight junctions. During my visits to the town I experienced delays caused by parked cars, delivery vehicles and local buses. Whilst queues can quickly develop they are also quick to disperse. I have no doubt that on occasion local roads become congested for longer periods especially at peak times. The appeal development would inevitably add more traffic to the local highway network and this must be judged in combination with the 92 homes to be built by Bloor Homes, also on the northern side of the town. However the evidence shows that junctions within the town would remain well within capacity with both developments in place and that queues would not significantly increase. The Framework makes clear that development should only be refused on transport grounds where residual cumulative impacts are severe. That would not be the case here.

36. Gloucestershire County Council as Highway Authority has raised no objections to the appeal scheme on traffic grounds and this is a matter of considerable weight. The proposal would accord with the relevant development plan policies relating to transportation in accordance with the Framework.

Flooding

37. There have been local concerns about flood risk and additional surface water runoff arising from the appeal development. The sites are within Flood Zone 1

where there is a low risk of fluvial flooding. The exception is the eastern part of Site B where no change is proposed. The Flood Risk Assessment concludes that other sources of potential flood risk, including from ground and surface water, would also be low. The post development runoff rates are to be maintained at the existing greenfield level. It is proposed to employ a sustainable drainage system (SuDS) for the housing development at Site A although the SM will be a constraint to drainage infrastructure.

Tourism

38. It is appreciated that Winchcombe is a very attractive town within the AONB. Its economy relies on the many tourists that visit and attractions include the historic Sudeley Castle. The town especially welcomes walkers who enjoy the numerous national footpaths that descend into the town from the surrounding countryside. Whilst I have concluded that there would be some harm to the setting of the AONB this would be restricted to relatively limited viewpoints along Greet and Gretton Roads. The enjoyment of the footpaths themselves and the tranquil experience valued by walkers would not be unduly diminished.

Heritage Matters

39. Several of the hedgerows have been found to be important under the 1997 Hedgerow Regulations. These include the hedgerows along the northern and eastern boundary of the Site A as well as that running along part of the centre and the southern boundary. The hedgerow along part of the southern boundary of Site B is also important. The importance of the hedgerows on Site A is due to their association with the SM. The northern boundary hedgerow also gains importance as a historic parish delineation as does the southern hedgerow on Site B. None of these hedgerows are deemed important on account of their wildlife or landscape interest.

40. In the main the significance of the important hedgerows referred to above would not be affected by the appeal proposal, apart from where the central and eastern hedgerow on Site A would be punctuated to provide footpath access. However from my observation at the site visit there are gaps within the hedgerows that could accommodate the necessary pathways. As layout is a reserved matter and the Masterplan in the Design and Access Statement is illustrative it is considered that small adjustments could be made to ensure that no harm ensues to the significance of the undesignated heritage asset.

Whether the proposal would be sustainable development taking account of the three dimensions in the National Planning Policy Framework.

41. The Framework establishes that sustainable development should be seen as a golden thread running through both plan-making and decision-taking. It identifies three dimensions to sustainable development, economic, social and environmental. It makes clear these roles are mutually dependent and should not be taken in isolation.

42. There is no dispute that in order to address the serious short term land supply deficit new housing in Tewkesbury Borough will have to be built on greenfield sites. As one of the most sustainable settlements in the borough, Winchcombe can be regarded as a suitable location for further housing development. The town is within and adjacent to the AONB apart from the northern section which is within the SLA. All things being equal this locally designated landscape would be considered as a preferable location to the nationally important

landscape of the AONB. Although the Strategic Housing Land Availability Assessment states not to be a policy document it makes clear that sites within the AONB have been ruled out as unsuitable and would need to be considered through the development plan process. It is not an unreasonable proposition that sites close to the settlement edge are generally more sustainable than those further away from it. Having granted planning permission for the Bloor Homes housing scheme, the only remaining land contiguous to the settlement and outside the AONB is Site A.

43. The appeal proposal would result in harm both to the SLA landscape and to the setting of the AONB. The former would be limited due to its localised nature. The latter would be more significant and there would be conflict with policies in both the Structure and Local Plans. There would though also be environmental benefits. These would include the improvements to the SM as well as the provision of a soft landscaped edge to the northern boundary of the town. There would also be other advantages including carbon reduction measures and the use of SuDS techniques. Although there would be a loss of agricultural land this should be set against the gains to biodiversity from the open areas within Sites A and B, including the wildflower meadow.

44. In terms of the social role, the most important benefit would be the provision of market and affordable homes to help meet housing needs over the next five years. There is no reason why the scheme should not deliver a high quality built environment that integrates successfully with the host community. New residents would be able to walk, cycle or travel by bus for many of their journeys. Various measures have been proposed to increase the accessibility of the location, including a section of new footway, various pedestrian crossing points and a Travel Plan. Footpaths across Site A would allow people to walk through the site including across the open space to reach Winchcombe School. In addition there would be a significant contribution to the bus service. As well as benefiting the new population these measures would also deliver wider advantages to the existing population of the town. Site B would offer a substantial area of land adjacent to Winchcombe School for sports pitches. The *Winchcombe Town Design Statement* mentions that there is a need for further sports facilities in the town. It is recognised that the provision would provide mitigation for the recreational needs of the new population. Nevertheless it would also provide a wider benefit to the local community which should not be overlooked.

45. In terms of the economic role the appeal scheme would deliver land in a sustainable location to improve choice and competition in the market place. This would contribute to economic growth both directly and indirectly. There would be new employment created during the period of construction, which is estimated as being three years. It is likely that many would be local jobs and this would boost the local economy. Businesses connected with the construction industry would also benefit and some of these would be local suppliers and trades. Once the development is complete new residents would spend a proportion of their household income locally. Whilst some of these people may already live within the area others would be from elsewhere. The Appellant has estimated that an annual expenditure of £650,000 would be generated of which £160,000 would be spent locally. This seems a relatively conservative estimate given the assumptions on which it is based.

46. I have carefully considered the environmental harm against the advantages of the scheme, including helping to address the serious deficiency of housing land. I have come to the conclusion that taking the policies of the Framework as a whole the proposal represents a sustainable form of development. The policies for the supply of housing are out of date and the adverse impacts of granting planning permission would not significantly and demonstrably outweigh the benefits that would be gained. There are therefore material considerations that override the conflict with the development plan, including saved SP Policy NHE.5 and saved LP Policy LND2 in this case.

Planning Obligations

47. There are two fully executed Planning Obligations by Agreement dated 9 April 2013. The first is with Gloucestershire County Council relating to education, libraries and transportation. It includes a Bonding provision to ensure that the relevant payments are made. The other is with Tewkesbury Borough Council relating to recreation, community facilities, medical care and various other requirements. I observed that no sum had been inserted in either document relating to the respective councils' legal charges. However I was told that the relevant monies had already been paid. I am satisfied that both of the legal agreements are legally sound and fit for purpose.

48. The policy context for the infrastructure contributions is provided by saved Policy S.5 in the SP, which requires consideration of the need for community services, education, sport and leisure facilities and transport services, amongst other things. Saved Policy GN11 in the LP seeks infrastructure provision and public services necessary to enable development to take place. However it is necessary to consider whether the obligations meet the statutory requirements in Paragraph 122 of the Community Infrastructure Levy (CIL) Regulations in order to determine whether or not they can be taken into account in the grant of planning permission. The requirements are that the obligations must be necessary, directly related and fairly and reasonably related in scale and kind to the development in question. It is noted that the Planning Obligations do not contain a clause that the contributions are conditional on my finding that they comply with the CIL Regulations.

Obligations to the County Council

49. A contribution has been made towards early years and primary education. The evidence indicates that there is a shortfall in provision within the Winchcombe area. There is sufficient information to be satisfied that the level of the contributions is justified. The money would either be spent on improving the qualifications of existing childminders or else towards providing additional capacity at the local playgroup which is oversubscribed. Winchcombe Abbey Church of England Primary School has limited scope to expand. However one room within the building is available to be used as a classroom and the money would be spent to increase capacity in this way.

50. The library contribution is based on the size of the new population and the cost of providing new stock, electronic access and increasing opening hours. However the information does not clearly demonstrate why existing facilities could not meet the needs of new residents. Whilst I was told that the lending area at Winchcombe Library is to be reconfigured to make more space available there is little convincing evidence that this is necessary in order for the development to go ahead.

51. A contribution is included to improve various crossing points on walking routes between the site and the town through tactile paving and the like. The evidence has included a breakdown of the costs to undertake the work, which includes the installation of dropped kerbs and tactile paving. There is also a contribution towards upgrading one of the bus stops local to the site on the bus route that runs towards Cheltenham along Greet Road. The evidence has included a breakdown of the costs to undertake the work, which includes a new bus shelter and real time passenger information displays. The bus service contribution would provide a morning and evening peak hour service on a subsidised route which is not presently viable. The information provided is sufficient to justify the payment and the objective is to encourage new residents to use the bus thus confirming its viability at the end of the one year period. The Travel Plan monitoring contribution would cover the cost of checking modal shift targets during the period that the plan is current. This is in accordance with the County Council's *Travel Plan Guidance* and is necessary to promote sustainable travel.

52. For the reasons given above there is sufficient information to be satisfied that the education and various transportation related contributions meet the CIL tests and can therefore be taken into account. The library contribution however has not been adequately justified, does not meet the CIL tests and cannot be taken into account.

Obligations to the Borough Council

53. The provision of the affordable housing would be linked by triggers to the market housing delivery to ensure that the affordable units are constructed within a reasonable timescale. There would be two trigger points and the arrangement would be acceptable to ensure the timely delivery of the affordable housing element of the scheme. The obligation is necessary to meet local housing needs.

54. In accordance with saved Policy RCN1 in the LP the appeal scheme would be required to provide 0.34 hectares of open space. The open space on the eastern side of Site A around the SM, which would include a children's play area, would exceed this requirement. There is provision for a Management Company to be set up and this would be responsible for the long term maintenance of the open space. The company would be financed through annual contributions from each household and is necessary to ensure the open space is properly looked after for the benefit of all who use it.

55. The Council has a local standard for playing pitches in different parts of the borough and in accordance with its Playing Pitch Strategy the requirement here would be for 0.25 hectares and this would be on Site B. The intention would be for this to be used by the school and community although the Planning Obligation makes arrangements for the transfer of the land in the first instance to the Council. A contribution has been made for the laying out of the pitches and the provision of changing facilities. Bearing in mind that the sports land would be transferred for the charge of £1, the financial contributions, which are based on Sport England's cost multiplier, would be reasonable and necessary.

56. There are also contributions towards the Cascades swimming pool in Tewkesbury and towards Astroturf provision at Winchcombe School. Whilst the sums of money involved are based on the Sport England sports facility calculator I have considerable doubts about the justification for these additional

contributions towards recreational facilities. There was insufficient information to be satisfied that the improvements to the pool would be necessary to accommodate those new residents who wished to use it. Winchcombe School would benefit considerably from the pitch provision referred to above and it is difficult to see how a further payment towards Astroturf could be justified.

57. Representations from local people and from the healthcare provider make clear that the existing medical centre in Winchcombe is operating at capacity. The medical centre contribution would be used to extend the facility and is worked out on the basis of the number of GP's needed to serve the new population, the space to accommodate them and the build costs for this space. There is room on the site to extend the existing building.

58. A contribution has been made for community facilities. It seems that this was initially offered by the Appellant. Whilst I was told that it may go towards more allotments or extending existing burial facilities it is difficult to see how the sum of money was worked out and what specific project it is intended to address to meet the needs of the new population.

59. There are several contributions that relate to facilities for individual households. These include a contribution towards refuse and recycling containers and a contribution towards the Smart Water Scheme. The latter is an anti-theft mechanism and has been requested by the police. Whilst these contributions have been worked out on the basis of cost of provision it seems to me that they relate to items for which individual householders should be responsible themselves. It is difficult to conclude that they are necessary for the development to go ahead. The provision of dog bins and appropriate signage would though be necessary to ensure that the open space on the eastern side of Site A is a safe and pleasant place for all to use. The contributions relate to the cost of provision and are justified.

60. For the reasons given above there is sufficient information to be satisfied that the obligations relating to the affordable housing provision and Management Company and the contributions towards school sports provision, the medical centre, dog bins and signage meet the CIL tests and can therefore be taken into account. The contributions towards the swimming pool, Astroturf provision, community facilities, refuse and recycling and the Smart Water scheme have not been adequately justified, do not meet the CIL tests and cannot be taken into account.

Planning conditions

61. I have considered the planning conditions suggested by the main parties bearing in mind advice in Circular 11/95: *The Use of Conditions in Planning Permissions*. I have reworded them where necessary in the interests of precision, relevance and enforceability. Wherever possible I have imposed conditions that reflect the Secretary of State's model conditions in the circular.

62. In order to contribute to the housing land supply shortfall in the short term it is reasonable to reduce the implementation period from that normally applied to outline proposals. The Design and Access Statement sets out the principles and parameters that the scheme would follow and against which the proposal has been assessed. This includes frontage development along Gretton Road and further details would be provided at reserved matters stage.

63. There are several conditions that require specific details to be submitted at reserved matters stage. These relate to such matters as materials, bin and cycle storage, planting schedules, hard surfacing as well as implementation. Whilst I can understand that the Council wishes to offer guidance to the developer they cover matters that relate to the reserved matters stage. It does not seem to me that these conditions pass the circular test of necessity. The exception concerns construction details of internal roads and footways and the details required to ensure that individual dwellings are not occupied before access to the public highway has been provided. Such details go beyond the reserved matter relating to layout and so I have worded these as stand alone conditions.

64. Hedgerows and associated trees are to be retained and a condition is required to ensure that they are protected during the construction period. The lower slopes of Langley Hill continue across Site A and details of site levels and slab levels are necessary to ensure that the new houses sit comfortably within the landscape. Such details would not necessarily be linked to appearance or layout and should be required through a stand alone condition.

65. The suggested drainage condition included foul drainage. However it is unnecessary to require details of this as the proposal is to connect to the main sewerage system and can be dealt with under other legislation. There is no suggestion that there is insufficient capacity to accommodate the new dwellings. It is proposed to dispose of surface water using SuDS techniques. The success of this approach in the longer term is particularly dependent on the effectiveness of the future management regime. A condition to cover these matters is therefore required. The sports pitches on Site B would not be provided by the Appellant and it seems likely that their development would require a further planning application by the end user. This would include consideration of the drainage works and so it is unnecessary for a condition relating to this matter to be imposed.

66. In the interests of the safety of future occupiers it is necessary to provide fire hydrants. Several improvements are proposed to pedestrian accessibility. These include a pedestrian crossing facility in Greet Road near to Winchcombe School and a new stretch of footway along the Gretton Road frontage. Conditions are required to ensure these improvements come about but requiring the footway to be maintained is not sufficiently precise and requiring it to be retained seems unnecessary.

67. Access is not a reserved matter but it is necessary to ensure that it is provided in accordance with the submitted details and surfaced satisfactorily prior to adoption. In order to ensure the free flow of traffic along Gretton Road it is appropriate to require a Construction Method Statement to cover matters such as operatives' parking and unloading arrangements. It will also include wheel washing arrangements to ensure excess mud is not deposited on the highway.

68. The Ecological Impact Assessment indicates that there are no designated sites of nature conservation value either on or adjacent to the appeal site. The hedgerows around and within the site would be largely retained and the proposal includes the creation of new grassland and a wildflower meadow in the vicinity of the SM. This would result in a gain to biodiversity but as suggested in the assessment an Ecological Management Plan is necessary for hedgerow enhancement and providing the new habitats on the eastern part of the Site A. The condition also specifies details for future management of these

areas although the open space would be looked after by the Management Company as specified in one of the Planning Obligations. Due to the archaeological importance of the site a programme of investigation and recording is required.

69. The Council suggested a condition requiring a minimum of 10% of the energy supply to be secured by decentralised and renewable or low carbon energy sources. This is not supported by any specific development plan policy and the Appellant's Energy Statement indicated that carbon reductions would be delivered by other means such as insulation of dwellings. It seems to me that the suggested condition, which requires a 30% improvement in carbon reduction above that required under Building Regulations would serve a similar purpose and allow greater flexibility as to how the savings could be achieved.

Overall conclusions

70. For all of the reasons given above the appeal proposal comprises sustainable development. Whilst there would be significant landscape harm and conflict with development plan policy there would also be substantial benefits. Most notably these would include the contribution towards housing land supply in the face of a serious short term deficit. I have taken account of the appeal decisions proffered by the Council where the lack of a 5 year housing land supply was found insufficient to outweigh the harm to the countryside. However each case is different and here I have found that the balance of considerations is clearly in favour of granting planning permission, notwithstanding the policy conflict. I have considered all other matters that have been raised but have found nothing that alters my conclusion that the appeal should succeed.

Christina Downes

INSPECTOR

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Mr Paul Cairnes	Of Counsel instructed by Ms S Freckleton, Borough Solicitor
He called	
Mr R Eaton BA(Hons) MTPL MRTPI	Planning Consultant with RJE Planning
Mr J Overall BA(Hons) CMLI	Landscape Architect with Ryder Landscape Consultants

FOR THE APPELLANT:

Mr Jeremy Cahill	Of Queen's Counsel instructed by Mr P Stacey, Turley Associates
He called	
Mr D Archer BA(Hons) DipTP MA MRTPI	Director of pad Design
Mr A Cook BA(Hons) MLD CMLI MIEMA CEnv	Director of Pegasus group
Mr P Finlayson BSc CEng MICE MIHT MCIWEM	Managing Director of PFA Consulting Ltd
Mr P Stacey BA DipTP CertArch MRTPI	Planning Director of Turley Associates

ROUND TABLE DISCUSSIONS ON CONDITIONS AND PLANNING OBLIGATIONS

Mrs K Riossi	Senior Solicitor with Gloucestershire County Council
Mr R Pitts	Senior Development Valuer with Gloucestershire County Council
Mr M Glaze	Development Co-ordinator for the Tewkesbury Area with the Highways Division of Gloucestershire County Council
Mrs F Evans BA MCIH	Housing Enabling Manager with Tewkesbury Borough Council
Mr A Sanders BA(Hons)	Leisure and Culture Manager with Tewkesbury Borough Council
Mr G Spencer LLB	Locum Solicitor with Tewkesbury Borough Council
Mr A Ross	Turley Associates
Mr A White	Planning Officer with Tewkesbury Borough Council

INTERESTED PERSONS:

Mrs A Telling	Local resident
Mr R Harrison	Chairman of Winchcombe Town Council
Mr D Bayne	Secretary and Trustee of the Campaign to Protect Rural England (CPRE) Gloucestershire

	Branch and Secretary of CPRE Cheltenham, Gloucester and Tewkesbury District
Mr J Mason	Local Borough Councillor for the Winchcombe Ward
Mr R Wakeford MRTPI (Hon)	Local resident, Co-ordinator of the Winchcombe Neighbourhood Plan, Town Councillor and Member of the Cotswolds Conservation Board
Mr M Watt MRTPI CMLI FArbor	Planning Officer with the Cotswolds Conservation Board

DOCUMENTS

1 Council's notification of the Inquiry and list of persons notified.
2 Statement delivered orally by Mrs Telling (local resident)
3 Statement delivered orally by Mr Bayne (CPRE)
4 Statement delivered orally by Mr Watt (Cotswolds Conservation Board)
5 Letter submitted by Mr and Mrs A J Brown, local residents
6 Draft conditions
7 Table prepared by the Borough Council showing CIL compliance of planning obligations
8 Correspondence from Natural England
9 Scheduling information for the Scheduled Monument on the eastern part of the site
10 Covering letter and extracts from the Inspector's Report into objections to the Tewkesbury Borough Local Plan
11 Statement delivered orally by Mr Harrison (Winchcombe Town Council)
12 Statement delivered orally by Mr Wakeford
13 Statement delivered orally by Councillor J Mason
14 Table prepared by the County Council showing CIL compliance of planning obligations (education and libraries)
15 Table prepared by the County Council showing CIL compliance of planning obligations (highways)
16 Briefing Note by Nathaniel Lichfield & Partners to explain the eVALUATE approach on behalf of the Appellant
17 Hedgerow Review submitted by the Appellant
18 Planning Obligation by Agreement between the owners, the Appellant and the County Council including the consent of Clydesdale Bank as Chargee
19 Planning Obligation by Agreement between the owners, the Appellant and the Borough Council including the consent of Clydesdale Bank as Chargee

PLANS

A Application plans
B Topography plan with the urban area marked
C Plan showing AOBB/ SLA boundary
D Approved layout of the Bloor Homes (Western) development, east of Greet Road, Winchcombe

SCHEDULE OF CONDITIONS

1. The development for which permission is hereby granted shall not be begun before detailed plans thereof showing the layout, scale and external appearance of the buildings, and landscaping thereto (hereinafter referred to as "the reserved matters") have been submitted to and approved by the Local Planning Authority.

2. Applications for the approval of the reserved matters shall be made to the Local Planning Authority before the expiration of 12 months from the date of this permission.

3. The development hereby permitted shall be begun before the expiration of 12 months from the date of approval of the last of the reserved matters to be approved.

4. Applications for the approval of the reserved matters shall be in accordance with the principles and parameters described and identified in the revised Design and Access Statement dated August 2012.

5. No development shall take place until details, which show how the existing trees and hedgerows that are to be retained will be protected during the course of construction, have been submitted to and approved in writing by the local planning authority. The details shall accord with BS 5837: *Trees in Relation to Construction*. All approved tree and hedge protection measures shall be in place prior to the commencement of construction and shall be retained thereafter until construction has been completed.

6. No development shall take place until details of existing and proposed ground levels and ground floor slab levels of the buildings relative to Ordnance Datum Newlyn have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

7. No development shall take place until a comprehensive and detailed drainage scheme for the disposal of surface water incorporating sustainable drainage principles and rain water harvesting (where possible), have been submitted to and approved in writing by the local planning authority. The scheme shall be in accordance with the submitted Flood Risk Assessment and Drainage Strategy dated March 2012 and shall include details of future management and maintenance and a timetable/phasing plan. Development shall be implemented in accordance with the approved drainage scheme.

8. No development shall take place until details of the provision of fire hydrants served by mains water supply, including a timetable for their provision, have been submitted to and approved in writing by the local planning authority. The fire hydrants shall be provided in accordance with the approved details and timetable.

9. No development shall take place until the applicant, or their agents or successors in title, has secured and implemented a programme of

archaeological work in accordance with a written scheme of investigation which has been submitted to and approved in writing by the local planning authority.

10. No works shall commence on site until details of a pedestrian crossing facility across Greet Road have been submitted to and approved in writing by the local planning authority. The works shall be completed in accordance with the approved details prior to occupation of any of the proposed dwellings.

11. No development shall take place until full details of all roadways within the site have been submitted to and approved in writing by the local planning authority. Details shall include drainage, surfacing, construction, visibility splays, turning heads, street lighting, footways, road gradients and a timetable for provision. Development shall be in accordance with the approved details and timetable.

12. Before any dwelling is first occupied the road between that dwelling and Gretton Road shall be constructed to binder course or surface course level and shall be retained in that condition until and unless the road is adopted as highway maintainable at public expense.

13. No dwelling shall be occupied until the footway along the frontage of Gretton Road has been provided in accordance with plan no R281/1 E.

14. No development shall take place until the proposed access off Gretton Road has been provided in accordance with plan no R281/1 E. The first 20 metres of the access road from Gretton Road shall be surfaced in a bound material and retained in that condition until and unless the road is adopted as highway maintainable at public expense

15. No development shall take place until a Construction Method Statement (CMS) has been submitted to and approved in writing by the local planning authority. The approved CMS shall be adhered to throughout the construction period. The CMS shall provide for:
    i. the parking of vehicles of site operatives and visitors
    ii. loading and unloading of plant and materials
    iii. storage of plant and materials used in constructing the development
    iv. wheel washing facilities
    v. measures to control the emission of dust and dirt during construction

16. No development shall take place until an Ecological Management Plan (EMP) has been submitted to and approved in writing by the local planning authority. The EMP shall be in accordance with the mitigation and enhancement measures in the Ecological Impact Assessment (dated April 2012). It shall include a timetable for implementation, details for monitoring and review and how the areas concerned will be maintained and managed. Development shall be in accordance with the approved details and timetable in the EMP.

17. A 30% improvement in carbon reduction above the 2010 Building Regulations requirement shall be secured across the development as part of the reserved matters submissions under Condition 1. This shall provide details of how the proposal will contribute to achieve aggregate reduction in carbon emissions in accordance with an agreed delivery trajectory.

End of conditions

Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England

This document contains guidance on the relevant legislation and its application in practice, sets out Natural England's general approach to designation and summarises the relevant governance and statutory procedures. It also contains a suggested method for applying the legislation to the practical assessment of landscapes in designation decision-making.

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2 March 2011
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NATURAL ENGLAND

Foreword

This guidance is intended, primarily, for use by Natural England specialist staff to help identify whether land is likely to meet the statutory criteria for AONB or National Park designation. We are, however, making it available on request to external audiences who may find it useful as an aid to understanding how decisions to designate are reached.

We will consider and respond to any formal proposal to designate or vary the boundary of an AONB or National Park but will, at all times, retain discretion as to which if any proposals to take forward, and how and when to do so. In any case which may proceed, Natural England will form its own view on whether or not the statutory criteria are met. The final extent of the area to be the subject of any consequential designation or variation order will also be entirely at Natural England's discretion.

This guidance will only be applied once a decision to commit resources to an assessment of an area of landscape against AONB or National Park designation criteria has been made. In coming to this earlier decision Natural England will have regard to a range of factors including:

- The extent/quality of evidence submitted that land might meet designation criteria;
- The reason(s) for the proposal;
- Evidence of local consensus that designation is appropriate;
- Benefit/positive impact of proposal balanced against the likely cost of designation;
- The relative importance of the proposal compared against other corporate priorities.

1. Introduction

1.1. This document explains how Natural England normally expects to:

- assess landscapes against the statutory designation criteria for National Park or Area of Outstanding Natural Beauty (AONB) designation;
- identify detailed boundaries for any areas that are considered to meet these criteria; and
- implement any Designation or Variation Orders necessary to give effect to this.

1.2. The assessment process described in this document effectively constitutes the **second** phase of a potential designation or variation project. This guidance will only be used once a decision to commit to undertaking a designation assessment has already been reached by Natural England. This earlier decision will take into account a number of factors including the likely availability of resources to execute a designation order, and its relative importance when compared against other work priorities.

1.3. This guidance updates and supersedes previous approaches developed by the former Countryside Agency for National Park and AONB assessment and boundary definition. It takes account of recent changes in the legislative framework relating to landscape designations as well as the outcome of the South Downs National Park Public Inquiry.

1.4. Although written for use by Natural England officers and their advisers, the document is also intended to be available to assist local authorities, landowners and other stakeholders when considering issues relating to the inclusion of land in a National Park or AONB.

1.5. Most of the conclusions which need to be drawn during an assessment following this guidance, and any decision-making on landscape designation rely on expert, professional judgments and the weighing of considerations, depending on the particular circumstances of each case. These decisions should be informed by professional advice where appropriate as well as information submitted by statutory consultees, the public and stakeholders. Natural England has a wide discretion in deciding what land should be designated, subject to review by the Secretary of State. This discretion is conferred upon it by statute. These matters are not readily susceptible to detailed guidance. This document can therefore only go part of the way towards seeking to offer guidance to those involved in the assessment of landscapes for designation. It is not intended to be complete or exhaustive guidance and it will be possible to depart from this guidance where the circumstances demand it. Above all, it is the actual words of the relevant statutory provisions which need to be applied in decision-making on designations.

2. Legal Framework

2.1. The statutory framework for protected landscapes in England was first established in the National Parks and Access to the Countryside Act 1949 ("NPAC 1949"). The legislation has been amended and added to many times since then. Today, land to be included in a National Park or AONB must meet the statutory designation criteria that are set out in the National Parks and Access to the Countryside Act 1949 (for National Parks) or the Countryside and Rights of Way Act 2000 (for AONBs). These are reproduced in Appendix 1 and summarised below. They apply whether a new designation is made or the boundaries of an existing National Park or AONB are varied.

2.2. The requirements for designation can be summarised as follows (with the differences between National Park and AONB highlighted in bold):

	AONB	National Park
Technical criteria	Natural beauty	Natural beauty Opportunities for open-air recreation
Desirability	Desirable to designate ... for the purposes of... (defined below)	Especially desirable to designate ... for the purposes of... (defined below)
Designation	AONB (normally with AONB Partnership or exceptionally a Conservation Board)	National Park (with National Park Authority)
Purposes	Conserving and enhancing its natural beauty	Conserving and enhancing its natural beauty, wildlife and cultural heritage Promoting understanding and enjoyment of its special qualities by the public

National Park

2.3. Section 5(2) of the National Parks and Access to the Countryside Act 1949 defines a **National Park** as an extensive tract of country in England which it appears to Natural England that, by reason of its:

natural beauty and the opportunities it affords for **open-air recreation**, having regard to both its character and its position in relation to centres of population, it is especially desirable that i**t is designated for** National Park purposes.

2.4. The purposes of a National Park are set out in section 5(1) as follows:

- conserving and enhancing its natural beauty, wildlife and cultural heritage, and
- promoting understanding and enjoyment of its special qualities by the public.

2.5. Some further clarification is provided in the legislation:

- Reference to conservation and enhancement of natural beauty includes conservation of its flora, fauna and geological and physiographical features (s.114(2) NPAC 1949; this provision applies to National Park purposes and not the assessment of natural beauty as such, however see the note to paragraph 6.3).
- When considering the natural beauty of an area, account may be taken of its wildlife and cultural heritage (s.5(2A)(a) NPAC 1949).
- Land is not prevented from being treated as of natural beauty by the fact that it is used for agriculture, or woodlands, or as a park, or that its physiographical features are partly the product of human intervention in the landscape (s.99 Natural Environment and Rural Communities Act 2006 ("NERC")).
- When considering opportunities afforded for open-air recreation, account may be taken of the extent to which it is possible to promote opportunities for the understanding and enjoyment of an area's special qualities by the public (s.5(2A)(b) NPAC 1949).

Area of Outstanding Natural Beauty (AONB)

2.6. Section 82(1) of the Countryside and Rights of Way Act 2000 ("CROW") defines an AONB in England as an area that is not in a National Park but which appears to Natural England to be of such outstanding **natural beauty** that it is desirable that the protective provisions of Part IV of CROW should apply to it for the purpose of conserving and enhancing the area's natural beauty. In such circumstances Natural England may, by order, designate the area as an AONB.

2.7. Some further clarification is provided in the legislation:

- Reference to conservation of natural beauty includes conservation of its flora, fauna and geological and physiographical features (s.92(2) of the CROW Act; this provision applies to the AONB purpose and not to the assessment of natural beauty as such, however see paragraph 6.3).
- Land is not prevented from being treated as of natural beauty by the fact that it is used for agriculture, or woodlands, or as a park, or that its physiographical features are partly the product of human intervention in the landscape (s.99 NERC).

Distinguishing National Park from AONB

2.8. The differences, at the designation stage, between National Park and AONB may be summarised as follows:

- AONBs need only meet the natural beauty test, National Parks must also meet the recreation test (see further paragraph 7.1);
- the test for desirability is different, with National Parks requiring the standard of 'especially' desirable (para. 8.6);
- AONB purposes do not include promoting understanding and enjoyment of the area's special qualities (para 8.8) except in the case of AONB Conservation Boards (para 8.8);
- in practice local authorities in many AONBs make a big contribution to promoting understanding and enjoyment; however, it is not a statutory purpose that can be taken into account at designation (para 8.9)

2.9. It is Natural England's view that the practical application of the natural beauty criterion is identical in National Park and AONB designation, despite there being differences in the degree to which the criterion is clarified in the legislation (para. 6.1ff. and 8.6).

Practical application

2.10. As can be seen from the preceding section, the legislation contains no exhaustive definitions of some important concepts: natural beauty, opportunities for open-air recreation, the desirability of designation or how to determine the detailed boundaries of designations.

2.11. Natural England has therefore considered in detail the way in which these concepts have been applied previously in designating National Parks and AONBs. The most recent designation, and the only one which takes into account the NERC Act, is in relation to the South Downs National Park and that has accordingly been taken into account. Natural England has also taken this opportunity to record the current 'best practice' techniques that have been developed in recent years to facilitate robust, rigorous and transparent assessment of landscapes for designation.

2.12. The remainder of this document addresses some particular aspects of the relevant statutory provisions and then sets out guidance on how Natural England normally expects to apply the statute and assess key factors.

3. Natural England's approach to designation

Principles

3.1. Natural England may decide to use its statutory powers to designate tracts of land as either AONB or National Park in furtherance of its general purpose of conserving and enhancing the landscape. We will use these powers judiciously, and future designation work within the current legal framework is likely to be confined to a limited number of particularly important boundary variations. .

3.2. Natural England intends to select areas for future consideration, and to prioritise these using transparent criteria. Once a project reaches a stage where the designation criteria need to be considered in detail, this guidance should be used. It explains how Natural England normally expects to apply the statutory designation criteria in practice when assessing landscapes for designation.

3.3. In considering whether to take forward a designation or variation project Natural England acts under Government guidance provided in 2004 that remains extant. This guidance states that "ultimately, boundary changes should be rarely needed" and "In considering responses to a consultation, the Countryside Agency [now Natural England] will have regard to local authority (or other) requests to extend or reduce the area being put forward for designation, but the final extent of the area to be the subject of a designation order will be entirely at Natural England's discretion. We would not expect consultation on a limited boundary variation to lead to wholesale re-evaluation of boundaries elsewhere.

3.4. In the simplest possible terms, the consideration of designating land under the legislation raises the following questions:

- Does this landscape have sufficient natural beauty?
- Does this landscape offer sufficient opportunities for open-air recreation?
- Is it desirable to designate this landscape as National Park or AONB?
- Where should the detailed boundary be drawn?

3.5. The main technique used to answer these questions is landscape character assessment. The document "*Landscape Character Assessment: Guidance for England and Scotland*" (Countryside Agency and Scottish Natural Heritage, 2002, under review at the time of writing) specifies two distinct stages for assessing landscapes: **characterisation** and **evaluation**. It also defines the key terms that are used in such assessments.

Table 1 Some key terms from Landscape Character Assessment (LCA)

Character: A distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse.
Characteristics: Elements, or combinations of elements, which make a particular contribution to distinctive character.
Elements: Individual components which make up the landscape, such as trees and hedges.
Features: Particularly prominent or eye-catching elements, like tree clumps, church towers, or wooded skylines. their character.
Characterisation: The process of identifying areas of similar character, classifying and mapping them and describing

3.6. Both characterisation and evaluation can use the techniques of landscape character assessment to gather information in a structured way. The characterisation stage (stage A below) divides the landscape into smaller areas (the 'spatial framework') and provides relatively value-free descriptions of the area. At the evaluation stage (stages B to E), judgments are made about the value of the landscapes within that spatial framework and the course of action that should be taken.

3.7. In the context of AONB and National Park designation, the **value** that is being assessed equates to the designation criteria for National Parks or AONBs as the case may be and in particular the 'technical criteria' of natural beauty and opportunities for open-air recreation. The considerations relevant to these statutory criteria should be stated clearly and then subjected to assessment. For those areas that pass this threshold, a judgment also then needs to be made as to whether it is desirable to designate the land concerned as AONB or National Park.

3.8. Once Natural England is satisfied that it has identified an area that should be taken forward for designation it is necessary to define a boundary in detail. This should be done employing the guidance on detailed boundary setting contained in this document at Section 5 and Appendix 4.

Practical application

3.9. In general terms, once a broad area of land potentially suitable for designation has been identified, the practical steps involved in assessing land for designation are as follows (see also the diagram below):

Guidance for assessing landscapes for designation

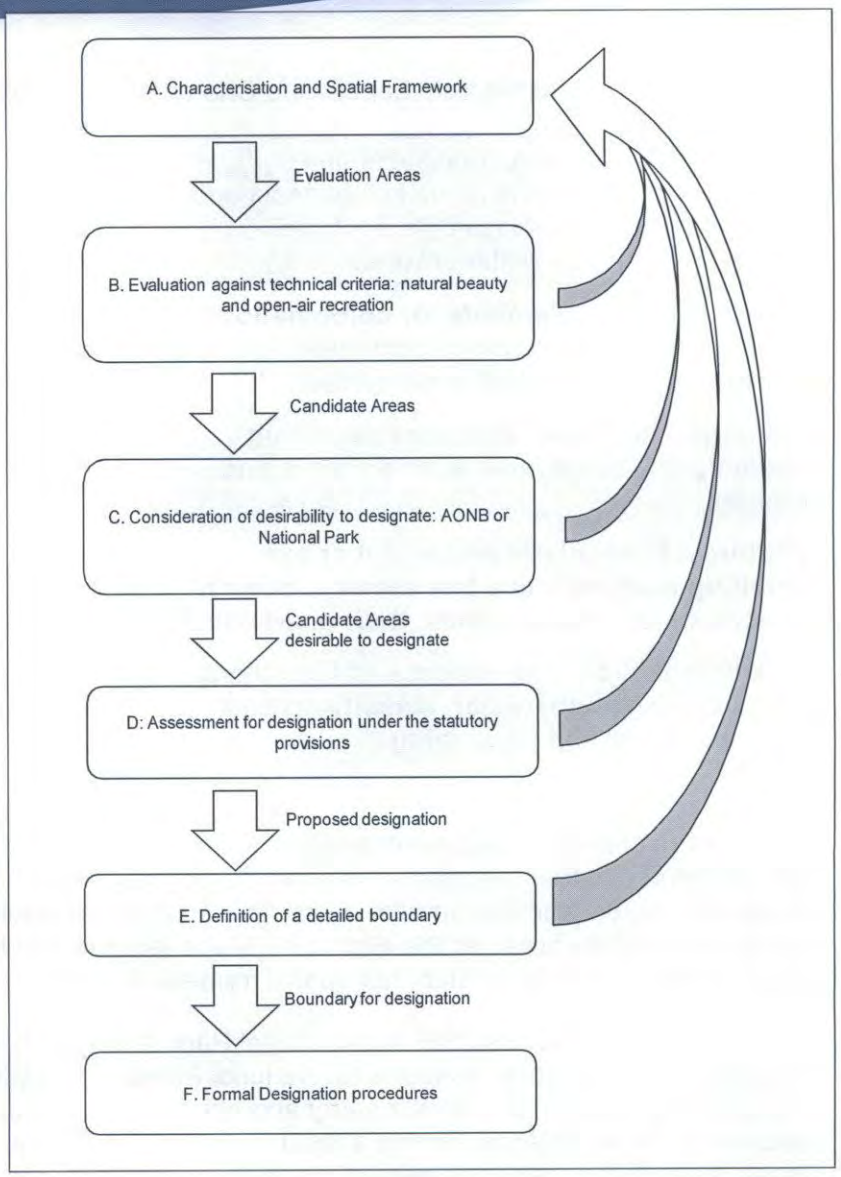
A. Characterisation and Spatial Framework (para 4.1ff): This is undertaken at an appropriate scale resulting in:

- a spatial framework of **Evaluation Areas** which are defined below; and
- a description of the character of these Evaluation Areas.

B. Technical Criteria (para 5.1ff)**:** Each Evaluation Area is evaluated against the following technical criteria:

- natural beauty (paras 6.1ff) and opportunities for open-air recreation (para 7.1ff) in the case of National Parks; and
- natural beauty only in the case of AONBs.
- An area that appears likely to be able to meet the technical criteria is included in a Candidate Area.

C. Desirability to Designate (para 8.1ff): For each Candidate Area, consideration is given to whether it would be desirable to designate the area as part of a National Park or an AONB. At this stage, it may also be necessary to decide between the options of designating National Park or AONB.



3.10. This process can then be repeated, if necessary, at more detailed scales for those areas that qualified under the technical criteria (stage B) and are considered desirable to designate (stage C). The intention of this process is to undertake practical evaluation of landscapes to judge whether the building blocks of a potential designation are present.

D. Assessment for designation under the statutory provisions (para 8.20): For a potential designation area, it is necessary to stand back and ask in relation to the area as a whole whether it meets the tests set out in statute for designation, both the technical criteria and the desirability of designation consideration.

E. Definition of a Detailed Boundary (para 9.1ff): The areas identified for designation are examined to define a detailed boundary which encloses them.

F. Formal Designation Procedures (para 10.1ff): Designation or Variation Orders are made and submitted to the Secretary of State for confirmation.

4. Characterisation and Spatial Framework

4.1. In order to aid the practical evaluation of a broad area of land potentially suitable for designation and to make evaluation a more manageable process, the broad area is divided into units of an appropriate scale to provide a spatial framework of landscape units which have been termed Evaluation Areas in this guidance.

4.2. Evaluation Areas should normally be defined, at least initially, using recognised landscape character assessment techniques described in national guidance[1]. Each evaluation area is characterised, resulting in character descriptions which provide a relatively objective and value-free evidence base for the next stage (evaluation). The characterisation covers not only landscape character (including the factors relevant to natural beauty) but also recreation.

4.3. The starting point should be a broad character assessment (eg at National Character Area level), followed by local character assessments (such as Landscape Character Assessments and Historic Landscape Characterisations prepared at County or District Council level, or local seascape analyses) to inform more detailed evaluation. It is important that the most up-to-date and reliable character assessment information is used. Ideally the character assessment should also have been subject to stakeholder consultation, indicating that it is supported by a broad consensus of opinion. A character assessment that provides a consistent spatial framework across the whole area under consideration is also helpful.

4.4. The use of Evaluation Areas is intended merely to make the practical work of detailed evaluation of landscapes more manageable. It is not intended to lead to the designation or exclusion from designation of any land merely because of the way in which Evaluation Areas have been defined. That is why the process is intended to be flexible and iterative in its application.

5. Technical Criteria: General

Principles

5.1. The technical criteria for designating National Parks are natural beauty and opportunities for open-air recreation. In the case of AONBs it is only natural beauty.

	AONB	National Park
Technical criteria	Natural beauty	Natural beauty **Opportunities for open-air recreation**

5.2. Natural England considers the practical application of the natural beauty criterion to be identical for both National Park and AONB, despite the fact that there is a difference in the extent to which it has been expressly set out in the legislation (see paragraph 6.5 for further details). Accordingly, the only technical difference[2] between areas capable of being designated National Park or AONB is that, in order to be designated National Park, an area must meet the recreation criterion.

5.3. The following general guidance is given as to how the technical criteria should normally be applied.

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[1] Landscape Character Assessment: Guidance for England and Scotland (2002)
[2] Apart from that relating to desirability of designation.

- Natural England considers the practical application of the natural beauty criterion to be identical for both National Parks and AONBs, despite the fact that there is a difference in the extent to which it has been expressly clarified in the legislation.
- It is not necessary for the land to be included in a proposed designation to be of the same or similar character.
- In the case of National Parks, there should normally be a degree of concurrence between the land which meets the natural beauty criterion and land which meets the recreation criterion. However it is not necessary that they overlap completely.
- Field-by-field evaluation is not appropriate.
- There is no requirement that every parcel of land must meet either or both of the criteria (ie there may be, and is very likely to be, land which meets neither).
- The decision to include land that does not itself meet the technical criteria depends on the location, scale and effect of that land. Particular care is required at the margins of a designation. Within the main body of a National Park or AONB there is likely to be greater scope for the inclusion of sizeable areas of land which do not themselves meet the technical criteria.
- If an area is fragmented by land which does not meet the technical criteria to such an extent that it affects the ability of the area as a whole to meet the technical criteria, then the entire evaluation area is unlikely to qualify.
- Section 99 of the NERC Act clarifies that landscapes that are partly the product of human intervention can still have natural beauty and may be included in designations. This principle is very significant in the context of English landscapes.
- A designation can 'wash over' (ie include) a tract of land even though that land does not itself meet the designation criteria, even close to the boundary of a designated area[3].
- It is not necessary to identify a precise 'hard' boundary for an area in relation to which the technical criteria are considered at the initial evaluation stage. However, gradual or sudden changes in quality or character near the margin of an Evaluation Area should be recorded, as they may be important for subsequent detailed boundary setting.

Practical application

5.4. Each Evaluation Area is evaluated against the technical criteria. An area that appears likely to be able to meet the technical criteria (either by itself or with other areas as part of a larger designated area) is included in a Candidate Area.

Table 2 Candidate Areas

Appears likely to meet technical criteria for:		
Natural Beauty	**Open-air recreation**	**Candidate Area for...**
yes	yes	National Park or AONB
yes	no	AONB only
no	yes	Not a Candidate Area
no	no	Not a Candidate Area

[3] This approach was applied in the Secretary of State's decision on the South Downs National Park and was described as "the 'washed-over' principle" (Letter on behalf of the Secretary of State for Environment, Food and Rural Affairs, 31 March 2009, "Proposed South Downs National Park" at paragraph 65).

5.5. At a subsequent stage (addressed under 'Desirability' at para 8.20), it is necessary to consider whether a number of Candidate Areas together, or Candidate Areas and an existing designation in the case of a boundary review, form an extensive tract that satisfies the National Park designation criteria, or an area which satisfies AONB designation criteria. This is significant because the statutory criteria for designating land as a National Park or AONB apply to the *extensive tract* or the *area* in question. It is the National Park or AONB as a whole which must satisfy the relevant technical criteria.

5.6. As is explained in paragraph 4.1ff, in practical terms it is simpler and more manageable to make the initial evaluation in relation to parts of a potential National Park or AONB area or extension area – ie the Evaluation Areas – rather than for the National Park or AONB area as a whole. This is not, however, a substitute for the assessment of whether a potential designation area as a whole complies with the relevant statutory provisions.

5.7. The result of the initial evaluation stage of the assessment is that all or part of each Evaluation Area that appears likely to be able to meet the technical criteria (either by itself or with other areas as part of a larger designated area) is identified as a **Candidate Area** for potential National Park and/or AONB designation. In cases where the judgment is not clear cut one way or the other, the area may be identified for further and more detailed scrutiny.[4]

5.8. Below we set out our recommended approach to evaluating the technical criteria in detail. It is based on factors, sub-factors and indicators which taken together tend to show whether or not a criterion is satisfied. However, the assessment of a landscape against the two technical criteria is not a simple 'tick box' exercise. Once appraisal in relation to the listed factors and indicators has been undertaken it will be necessary to stand back and ask whether, having regard to all relevant considerations, the land has sufficient natural beauty and opportunities for open-air recreation, in line with the relevant statutory provisions. The listed factors and indicators are not intended to alter or replace the statutory criteria but merely to provide practical guidance for the assessment of areas against the criteria.

6. Natural Beauty

Principles

6.1. Natural beauty is not exhaustively defined in the legislation. It is also a very subjective characteristic of a landscape and ultimately involves a value judgment. In deciding whether an area has natural beauty, Natural England must therefore make a judgment as to whether people are likely to perceive a landscape as having sufficient natural beauty. In order to make these judgments (some of which are subjective) in a transparent and consistent way, this Guidance sets out which criteria Natural England intends to use.

6.2. In England it is widely accepted that the beauty of all our most cherished landscapes is in part due to human intervention such as agriculture and forestry. It has long been the practice to include such factors in the assessment of natural beauty. This is now clarified in statute, and in the case of both AONBs and National Parks land is not prevented from being treated as being of natural beauty by the fact that it is used for agriculture, or woodlands, or as a park, or that its physiographical features are partly the product of human intervention in the landscape (s.99 of NERC Act).

[4] An Evaluation Area may contain land that meets the criteria to varying degrees. Such variations should be identified. A decision can then be made on whether to exclude the non-qualifying parts of the Evaluation Area from the potential National Park or AONB designation or whether in the context of the area as a whole they can be included. Alternatively, the extent of an Evaluation Area may be adjusted, so that a revised area of land is then re-considered against the technical criteria.

6.3. It is Natural England's view that fauna and flora (i.e. wildlife), geological and physiographical features[5] and cultural heritage can contribute to the natural beauty of all landscapes and that any assessment of natural beauty must take these factors into consideration, whether in relation to a National Park or an AONB designation.[6] For example, the presence of particular wildlife or cultural heritage features can make an appreciable contribution to an area's sense of place and thereby heighten the perception of natural beauty. There is now express statutory clarification that wildlife and cultural heritage may be taken into account in assessing natural beauty for National Park designations (s.59(1)) of NERC).

6.4. During the passage of the NERC Bill through Parliament, Lord Bach for the Government explained that "the intention, and the current practice, is that wildlife and cultural heritage considerations are factored into the natural beauty assessments rather than being free-standing tests in their own right"[7] . Whilst this statement was made in connection with National Parks, past and present practice has been to treat the practical assessment of natural beauty in National Parks and AONBs in the same way.

6.5. Notwithstanding the differences in the express statutory provisions, the Government's formal position during the passage of the NERC Act was that the natural beauty required of a National Park and an AONB are the same.[8] Natural England considers that there is no material difference between the requirements in practical terms of the natural beauty criterion in the two pieces of legislation. Accordingly, if an area meets the natural beauty criterion, Natural England will normally consider it to have natural beauty of a standard suitable for either National Park or AONB designation.

Practical application

6.6. The systematic evaluation of natural beauty can be a complex exercise requiring careful assessment and judgment. Natural England has developed a list of **factors that contribute to natural beauty**. It provides a practical framework for an evidence-base which assists in making judgments about natural beauty in a rigorous and transparent way. The suggested factors (see Table 3) have been drawn from the landscape value criteria included in the Landscape Character Assessment Guidance 2002. They have been restated in Table 3 to show more explicitly which factors relate to natural beauty and which to other aspects of the statutory criteria[9] .

6.7. The factors listed in this guidance for the two technical criteria are the main relevant factors. The lists are not intended to be exhaustive and other factors may be relevant in some circumstances. Not all factors will be relevant in every case.

6.8. Each of these factors is itself divided into sub-factors, which are judged by indicators **(see Appendix 1**). The indicators are statements of the features, characteristics and qualities which tend to indicate whether a particular factor is present. The factors, sub-factors and their indicators in Appendix 1 are not presented in order of importance.

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[5] This view does not rely on the 'extended definition' of natural beauty contained in s.114(2) NPAC and s.92(2) CROW which refer specifically to the purpose of 'conserving and enhancing' natural beauty.

[6] The European Landscape Convention defines landscape as *an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors.*

[7] Lords Hansard 27 Feb 2006 (Col 79)

[8] See Lords Hansard 20 Mar 2006 (Col 51) and Commons Hansard 13 June 2000 (Col 556W). That the natural beauty criterion was the same for National Parks and AONBs was also accepted by the Inspector in the re-opened South Downs National Park inquiry.

[9] The LCA guidance sets out a list of tests for 'landscape value'. In this approach, all the factors in the list are retained, but they have been disaggregated to show how they relate to the different components of the statutory criteria, including the consideration of the desirability of designation.

Table 3 ***Factors related to Natural Beauty***

Landscape quality This is a measure of the physical state or condition of the landscape.
Scenic quality The extent to which the landscape appeals to the senses (primarily, but not only, the visual senses).
Relative wildness The degree to which relatively wild character can be perceived in the landscape makes a particular contribution to sense of place.
Relative tranquillity The degree to which relative tranquillity can be perceived in the landscape[10] .
Natural heritage features The influence of natural heritage on the perception of the natural beauty of the area. Natural heritage includes flora, fauna, geological and physiographical features.
Cultural heritage The influence of cultural heritage on the perception of natural beauty of the area and the degree to which associations with particular people, artists, writers or events in history contribute to such perception

6.9. The sub-factors and associated indicators should be regarded as a "menu" of examples (developed from past designations and subsequent consultation) from which those appropriate to the character of the landscape under consideration should be chosen, adapted or added to. There is no "scoring" involving accumulations of indicators and it is possible for a landscape to exhibit natural beauty or offer opportunities for open air recreation even a number of the indicators suggested in **Appendix 1** are not present.

6.10. It is useful to highlight some general points on the application of the natural beauty criterion:

- There is no need for a National Park or AONB to display a distinctive or coherent identity. A designation can contain different landscapes so long as the designation as a whole satisfies the natural beauty criterion.[11]

[10] See MacFarlane, R., Haggett, C., Fuller, D., Dunsford, H. and Carlisle, B. (2004). Tranquillity Mapping: developing a robust methodology for planning support, Report to the Campaign to Protect Rural England, Countryside Agency, North East Assembly, Northumberland Strategic Partnership, Northumberland National Park Authority and Durham County Council, CESA, Northumbria University. See also http://www.cpre.org.uk/campaigns/landscape/tranquility

[11] The criterion is one of natural beauty, not 'characteristic natural beauty'. This is clearly laid out in paragraphs 2.45 to 2.48 of the Report into the South Downs National Park, Inspector's Report (2), 28 November 2008

- **Not all factors or indicators have to be present across a designation**. Different parts of a designation can satisfy the natural beauty criterion for different reasons, provided that overall the area is of sufficient natural beauty to be designated as a National Park or an AONB.
- The weight and relative importance given to different factors or indicators may vary depending on the geographic context. For example, in the South Downs, less weight was given to relative wildness and more to relative tranquillity and natural and cultural heritage features, reflecting the area's lowland, settled character and proximity to major centres of population. Comparisons are not to be made to other designated areas or adjacent areas but against wider countryside[12].

6.11. The effect of **settlements** and other major developments are assessed on their individual merits by considering their particular character and qualities and their relationship to the adjoining landscape. It is recognised that many settlements have cultural heritage qualities that can make a positive contribution to natural beauty. While this could be said to be true regardless of settlement size, in some cases a settlement may detract from the landscape to such an extent that it should be considered an incongruous feature.

6.12. The effects of **incongruous features** are assessed for the extent to which they detract from the natural beauty of an area under consideration. It is relevant to take into account whether a feature is temporary or transient. If an incongruous feature does not adversely affect natural beauty, it is not relevant that the feature does not in itself have natural beauty. It is a matter of judgment whether an incongruous feature has such an adverse effect that the whole potential designation fails to meet the natural beauty criterion (even though the area might, in the absence of the detractor, qualify) or whether it can be included. The cumulative impact of such features and the degree to which qualifying parts of the potential designation are fragmented may be relevant to the assessment.

7. Opportunities for Open-Air Recreation

Principles

7.1. This criterion only relates to designating National Parks. AONBs may fulfil a recreational role but they are not designated for any recreational opportunities they may offer.

7.2. The statute provides simply that the type of recreational opportunities to which consideration should be given are "open-air recreation". The statute excludes "organised games" but is no more restrictive than that. In considering opportunities for open-air recreation, the statute requires that regard be had in particular to the character of the land. This suggests that the character of the land has an important bearing on whether the opportunities for open-air recreation are sufficient to warrant designation. However, a 'markedly superior recreational experience' (see below) does not necessarily rely on the land having any particular character. Nor does the statute provide that particular types of open-air recreation can or cannot be taken into account (save for organised games). Provided that the landscape satisfies the natural beauty criterion, the question of whether or not it offers a markedly superior recreational experience should be assessed on its merits having regard to all relevant considerations.

7.3. Recreational opportunities to be taken into account should normally be consistent with the conservation and enhancement of the area's natural beauty, wildlife and cultural heritage. Quiet outdoor recreation is therefore likely to be the most weighty consideration under this criterion.

[12] In the course of the reopened South Downs public inquiry the Inspector repeatedly used the term "ordinary countryside" to describe wider countryside that was currently undesignated. For example see paragraph 2.53 of the Inspector's Report (2), 28 November 2008

7.4. The statute also requires that regard is had to the position of the potential designation in relation to centres of population. This suggests that the accessibility of the potential designation to urban areas also has an important bearing on whether an area should be designated by reason of the opportunities it affords for open-air recreation.

7.5. Opportunities for open-air recreation are not limited to present facilities, but include an ability to look to the future – opportunities is equivalent to the land's potential.

7.6. It is not just the quantity of opportunities that is relevant, but also their quality, which should exceed that normally available in the wider countryside.

Practical application

7.7. This criterion is normally evaluated in practice by considering a number of **factors that contribute to the presence of sufficient opportunities for open-air recreation** (see Table 4). The factors provide a practical framework for the detailed expert work of assembling an evidence base for making judgments about opportunities for open-air recreation. In assessing land against these factors, it is relevant to consider the type, quality and quantity of opportunities available.

7.8. In considering these factors, the extent to which it is possible to promote opportunities for the understanding and enjoyment of the area's special qualities may be taken into account. It is therefore permissible to look to the future, beyond present potential, to consider whether it is possible to initiate further opportunities in the future, bearing in mind National Park purposes, the duty on public bodies to have regard to these purposes, and the powers and duties of a National Park Authority with regard to recreation. It is important that improvements in future recreation and understanding are not merely vague, speculative or unrealistic aspirations. The potential for improvements must therefore be a realistic possibility within a reasonable time scale.

7.9. It is not necessary that all factors or indicators be present across a designation, as different parts of a designation can satisfy the recreational criterion for different reasons. Overall, there should be a weight of evidence that an area of countryside has (or is capable of providing) sufficient **opportunities for open-air recreation** to such an extent that it provides a markedly superior recreational experience. Comparisons are not to be made to other designated areas or adjacent areas but against ordinary countryside.

7.10. Particular attention should be paid to public access to the land. While it is a matter of judgment whether a lack of public access to an area of land precludes satisfaction of the statutory criterion in a particular case, it is clearly unreasonable as a matter of principle to expect all land to be accessible, whether situated within the main body of a National Park or at its margins. Where there is no access, land may still be visually appreciated and enjoyed by those engaged in open-air recreation elsewhere in the National Park. It has been established that a designation may 'wash over' (ie include) an area of land even when there is no public access to it for recreational purposes.

Table 4 *Factors related to Opportunities for Open-Air Recreation in National Parks*

The area must be able to deliver a markedly superior recreational experience. This is an overall assessment, to which amongst others the following factors can contribute:
• **Access to high quality landscapes:** the presence of natural beauty and in particular relative tranquillity and relative wildness. There is no particular type of natural beauty that is more suitable for recreation in National Parks. Weight should be given to accessibility from centres of population.
• **Features of interest:** access to a wide range of **natural or cultural heritage features or cultural associations**. This includes landmarks and features of recognised value, appropriate to the enjoyment of open-air recreation. The presence of such features can enrich the landscape experience and sense of place and may enhance people's perception/appreciation of natural beauty and understanding of the special qualities of the area.
• **Good recreation provision:** The area should provide, or have the potential to provide, a range of recreation opportunities, a **diversity** of experiences and the opportunity for high **quality** open-air recreation including in particular that which is consistent with the special qualities of the area and does not detract from the enjoyment of the area by others. Particular regard should be had to the **accessibility of the provision from centres of population.**

7.11. The factors, sub-factors and indicators are given in **Appendix 2**. They are not in order of importance.

8. Consideration of Desirability of Designation

Principles

8.1. The decision whether it is desirable to designate lies at the heart of the legislation. An area of land that satisfies the natural beauty and recreational opportunities criteria is capable of being included in a National Park or AONB. Designation does not, however, follow automatically: it is for Natural England to exercise its judgment as to whether the desirability test is met, i.e. whether an area, which meets the relevant technical criteria should become a National Park or AONB in order to

achieve the purposes of that designation. The following are the fundamental practical questions to address in considering each type of designation:

- Is it especially desirable to create a National Park (with a National Park Authority, management plan and certain duties on public bodies) in order to conserve and enhance the area's natural beauty, wildlife and cultural heritage and promote the understanding and enjoyment of its special qualities by the public?
- Is it desirable to create an AONB (with an AONB Partnership or statutory conservation board, management plan and certain duties on public bodies) in order to conserve and enhance the area's natural beauty?

Purposes of designation

8.2. The objective of giving landscapes National Park or AONB designation is to ensure that the purposes of designation are pursued. The purposes are:

	AONB	National Park
Purposes	Conserving and enhancing its natural beauty	Conserving and enhancing its natural beauty, wildlife and cultural heritage Promoting understanding and enjoyment of its special qualities by the public

8.3. National Parks and AONBs have the purpose of conserving and enhancing the area's natural beauty, which encompasses its flora, fauna, geological and physiographical features.[13] The Government considers this to confer "the highest status of protection as far as landscape and natural beauty is concerned."[14] In National Parks, this purpose also encompasses the conservation and enhancement of its wildlife and cultural heritage.

8.4. National Parks have the second purpose of promoting the understanding and enjoyment of its special qualities (see para. 8.16) by the public. If there is a conflict between the first and the second purpose, the 'Sandford' principle requires that greater weight should be given to the first purpose[15].

8.5. The lead role in achieving the purposes of designation rest with the National Park Authority, AONB Partnership or Conservation Board. However, a duty to have regard to the purposes of designation applies to all relevant bodies, which includes Government departments and agencies, public bodies, statutory undertakers and persons holding public office.[16]

Distinguishing National Park and AONB

[13] S.114(2) NPAC and s92(2) CROW
[14] English National Parks and the Broads: Government Vision and Circular 201 (Defra, 2010), para. 20
[15] S.11A(2) NPAC
[16] Guidance on this duty is available in Duties on relevant authorities to have regard to the purposes of National parks, AONBs and the Norfolk and Suffolk Broads (Defra, 2005) and England's statutory landscape designations:a practical guide to your duty of regard (NE, 2010)

8.6. **Different thresholds** apply to AONB and National Park designation. The implication of the word 'especially' is that the threshold of desirability for the designation of land as a National Park is higher than that for an AONB. This may be justified because a National Park designation brings with it more significant changes in the administration of the area. [17]

8.7. In both cases though, Natural England intends to apply a high threshold, in recognition of the fact that National Park / AONB represent the highest level of landscape protection. Areas should be nationally significant in order to be considered desirable to designate, and there should be confidence that the mechanisms, powers and duties resulting from designation are necessary to ensure the delivery of National Park / AONB purposes.

8.8. National Parks and AONBs have **different purposes.** AONBs do not have the statutory purpose of promoting the understanding and enjoyment of the area's special qualities to the public. AONB Conservation Boards[18] are a special case, having the additional purpose of "increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty" (CROW s.87). In all AONBs there is no duty on relevant authorities (other than the Conservation Board) to have regard to the understanding and enjoyment of the area's special qualities.

8.9. In practice, AONB partnerships have been encouraged to promote understanding and enjoyment of the area's special qualities. Currently in many cases local authorities use their powers to do this. This contrasts with National Parks mainly in the scale, resources and expertise available, and in the fact that in National Parks it is an entrenched purpose to which all public bodies must have regard under statute.

8.10. There is also an apparent difference in the first purpose: both designations share the purpose of conserving and enhancing natural beauty (including flora, fauna, geological and physiographical features), but for AONBs this does not expressly include the purpose of conserving and enhancing wildlife or cultural heritage. In fact, 'wildlife' is practically equivalent to 'flora and fauna'. Furthermore, Natural England considers that 'cultural heritage' often contributes to the perception of natural beauty of the area (see Table 3) and so forms part of the AONB purpose to the extent that this is the case.

Practical application

8.11. In order to help assess whether it is desirable to designate an AONB or a National Park a number of questions can usefully be posed.[19] These are detailed below in Table 5.

Table 5: Is it Desirable to Designate?

Is there an extensive tract that satisfies the National Park technical criteria, or an area which satisfies AONB technical criteria?
Is the area of such **significance** that National Park or AONB **purposes** should apply to it?
What are the issues affecting the area's **special**

[17] When considering the desirability of designation of land as either a National Park or an AONB, the actual words used in the statute should be applied in decision-making. However, in this guidance 'desirable' is used as shorthand to refer to the concept relating to both types of designation.
[18] As at March 2011 there are two Conservation Boards: for the Chilterns AONB and the Cotswolds AONB.
[19] It should always be remembered however that the assessment of land for designation must be made by reference to the actual words of the relevant statutory provision.

qualities and understanding and enjoyment?
Can National Park or AONB purposes be best pursued through the management **mechanisms, powers and duties** which come with National Park or AONB designation?
Are there **other relevant factors** which tend to suggest whether it is or is not desirable to designate the area?

8.12. The considerations relating to AONBs can be applied if the technical criterion of outstanding natural beauty is met. The considerations relating to National Park designation may only be applied if both the natural beauty criterion and the opportunities for open-air recreation criterion are met. It is also necessary to consider whether the Candidate Areas together, or Candidate Areas together with an existing designation in the case of a boundary review, are capable of forming an extensive tract that satisfies the National Park designation criteria, or an area which satisfies the AONB designation criterion. It is advisable, on completion of the "desirability" assessment, to verify whether any desirability factors could affect the overall composition of the proposed designation.

8.13. When considering **significance**, it is useful to take into account the following:

- **Special qualities:** the area's special qualities, ie those aspects of the area's natural beauty, wildlife and cultural heritage, which make the area distinctive and are valuable, particularly at a national scale.
- **Understanding and enjoyment:** the opportunities to promote the understanding and enjoyment of the area's special qualities.
- **Consensus:** Where there is a consensus of opinion that an area meets the statutory criteria or should be designated, this helps in determining whether it is accorded a special value that should be recognised. Views of stakeholders and the public can be strong indicators as to whether there is consensus about the value of a landscape. Evidence of past and present recognition of the importance of the landscape is therefore relevant. Care should be taken to ensure adverse change has not occurred in the landscape since consensus was reached.
- **Rarity or representativeness:** If a landscape, or an element within it, is rare or representative of a particular type of landscape, it may add weight to the judgment that an area should be represented within a National Park or AONB, although this is not an essential requirement.

8.14. Natural England should use these considerations help to judge whether or not an area is **of such national significance** that special purposes should apply to it, i.e.:

- **National Park purposes**: its natural beauty, wildlife and cultural heritage should be conserved and enhanced; **and** the understanding and enjoyment of its special qualities should be promoted;
- the **AONB purpose** alone: its natural beauty should be conserved and enhanced; or
- not of such national significance that those purposes should not apply.

8.15. To assist with decision-making, consideration should be given to whether these purposes can be delivered effectively using current arrangements, or as part of a nationally designated landscape. This assessment may be made by first considering the issues affecting the area's special qualities and options available to address them.

8.16. **Issues affecting special qualities and understanding and enjoyment:** These include current and longstanding issues and the significant forces for change which affect an area's natural

beauty, recreational opportunities, and special qualities, and the ability to promote their understanding and enjoyment. The scale and impact of issues and likely changes should be assessed. Both current and possible future issues are potentially relevant.

8.17. **Mechanisms, powers and duties:** Consideration should be given to an appropriate response to issues identified above. The following factors may be relevant (Appendix 3 gives more detail):

- **Management arrangements:** the extent to which current and alternative management arrangements address the issues affecting the area and deliver National Park / AONB purposes. Management in pursuance of National Park or AONB purposes can deliver wider environmental benefits such as climate change mitigation and adaption, and improved connectivity of wildlife habitats, In cases where AONB designation is an option, consideration should be given to whether, due to the size of the area or its administrative complexity, establishment of a statutory Conservation Board might be justified.
- **Funding:** Current and expected future funding that contributes to National Park / AONB purposes should be considered against likely future funding under alternative scenarios. Concerns regarding the immediate availability of funds to support management of a National Park or AONB should not normally outweigh other consideration considerations of desirability. Designation represents a long term commitment which is likely to outlast current funding and detailed management arrangements.
- **Regulation and development control:** This refers to the ability of statutory regulation powers, and development control powers, to contribute to National Park / AONB purposes.
- **Integrated management for the future:** The degree to which strategic planning (such as Local Development Frameworks, Rights of Way Improvement Plans, NP / AONB Management Plans etc) could contribute to National Park / AONB purposes.
- **Duties and incentives for statutory bodies and others:** Here it is relevant to consider what duties there are on public bodies to deliver National Park / AONB purposes, and what incentives exist for others to contribute to delivering National Park / AONB purposes.

8.18. This is not an exhaustive list of considerations: **other factors** may be relevant if they can reasonably be said to relate to the judgment as to whether it is desirable that a particular area of land should be designated as National Park or AONB.[20] The more directly or substantially a factor bears upon the achievement of National Park or AONB purposes the more weight Natural England is likely to give it in the decision whether or not it is desirable to designate.

8.19. Natural England recognises that designation may have impacts beyond the statutory purposes. Common issues raised include democratic representation, impacts on housing markets and local economies. Natural England, in designating, must bear in mind that Parliament has put in place the basic framework of National Parks and AONBs which addresses some of these issues. In addition, Government policy influences how National Parks and AONBs operate in relation to wider policy areas, such as housing, the economy and planning. Any matters beyond those relevant to the consideration of the desirability of designation may rightly form the basis of Natural England's advice to Government.

8.20. Natural England must then look at all these matters as a whole to satisfy itself whether it is **especially desirable** to designate the area as National Park, or whether it is **desirable** to designate it as AONB. The decision is not taken on the basis of Evaluation Areas or Candidate Areas but rather on the whole area of a potential designation – an "extensive tract of country" in the case of National

[20] As to other relevant factors which may bear on whether it is desirable to designate land, in relation to the South Downs National Park the Secretary of State considered that it was especially desirable to designate that land because it was in relatively close proximity to major population centres in the South East.

Parks and an "area" in the case of AONBs. A potential designation may be comprised of land that was, for practical evaluation purposes, contained in part or all of one or more Evaluation Areas. If ultimately the question of designation is to be formally posed, then the whole area to be subject to designation should be considered in its proper context against the actual text of the relevant statutory provisions themselves. In the case of National Park this is section 5 of the National Parks and Access to the Countryside Act 1949, and in the case of AONBs this is section 82 of the Countryside and Rights of Way Act 2000.

9. Definition of a Detailed Boundary

Principles

9.1. The principal purpose of setting a detailed boundary is to determine where it is desirable that the designation of a particular National Park or AONB should begin and end.

9.2. When defining the detailed boundary there may be more scope for excluding particular areas of land that do not satisfy the criteria where they are located close to the boundary rather than within the main body of the designation. This should not however normally require a field-by-field assessment of land at the margins of the designation.

Practical application

9.3. Natural England will normally apply the guidelines set out in **Appendix 4** when setting a boundary. It is important that decisions reached when defining the boundary are made consistently along its length.

10. Formal Designation Procedures

10.1. Natural England has statutory powers to designate National Parks and AONBs[21] and also to vary their boundaries.[22] It does this by making statutory orders, which take effect only if confirmed by the Secretary of State (who may also amend them, or refuse to confirm them). The Secretary of State also has freestanding powers to vary or revoke designations. The following procedures apply equally to new designations as they do to variations to existing boundaries.

10.2. Before any formal orders are made, the legislation specifically requires that all county councils, district councils, National Park Authorities and parish councils, who have land within the area to be designated (or in the National Park or AONB to be varied), must be consulted prior to a designation order being made. As a matter of good practice, Natural England will also throughout the process seek engagement with key stakeholders and the general public.

10.3. Consultation responses may present new evidence to justify the inclusion or exclusion of land, identify further considerations as to the desirability of designation or identify specific boundary issues which need review. Therefore, after consultation, Natural England normally reviews its evidence and produces a revised proposal if necessary. The relevant stages of the process of evaluating land for designation set out above may therefore be repeated as necessary as part of an iterative process.

10.4. Following review and possible refinement, the land proposed for designation and the associated boundary may be formally adopted by Natural England. This final decision is reserved for the Board of Natural England.

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[21] s.5(3) NPAC 1949 and s.82(1) CROW 2000
[22] s.45 Wildlife and Countryside Act 1981 and s.83(7) CROW 2000

10.5. In the case of an AONB, a draft Designation Order is drawn up and placed on deposit for anyone to make representations to Natural England. Only then is it *made* (ie given formal legal existence) and submitted to the Minister with a copy of any representations. In the case of a National Park, a Designation Order is *made,* submitted to the Minister and then placed on deposit for anyone to make representations to the Minister. In both cases, the deposit period is publicised widely and documents and maps will be available for inspection.

10.6. If there are objections from a local authority which are not withdrawn, the Minister must hold a public inquiry. In this context 'local authority' does not include a parish council. The Minister may also hold a public inquiry or afford alternative ways to allow people to make further representations in any event.

10.7. The Minister may or may not confirm a Designation Order, with or without modifications, having considered any representations received and, in the event of a public inquiry, having considered the report of the inspector. If minded to confirm, the Minister makes a Confirmation Order, which contains details of any modifications to the original Order, and specifies when any new designation comes into effect.

10.8. Confirmation of the designation is made by the Minister once he or she has considered any representations to the Designation Order, or following receipt of an inspector's report in the event of a public inquiry. Where any modifications made by the Minister add land to the National Park or AONB not affected by the original designation order, notice must be given that the additions have been made and opportunity provided to hear representations on or objections to them.

10.9. The Secretary of State will need to make an establishment Order in the case of a new National Park to create the National Park Authority and in the case of an AONB if a new Conservation Board is to be created. It may also be necessary to vary establishment Orders in the case of National Park or Conservation Board boundary variations if a new local authority is added to the existing area. Detailed provisions are contained in section 63 and Schedule 7 Environment Act 1995 and section 86(7) CROW.

11. Further information

11.1. While this paper deals only with the designation of National Parks and AONBs, Natural England has a wider role to further the role of protected landscapes. Its Protected Landscapes Position (2010) sets out the position Natural England will adopt in this regard and its related advisory and guidance activities, both now and in the immediate future. It provides Natural England's approach to new and amended designations, and sets out how it will continue to work in partnership with the organisations representing the national family of protected landscapes.

11.2. Relevant documents:

- Landscape Character Assessment, Guidance for England and Scotland (SNH & CA, 2002)
- English National Parks and the Broads: UK Government Vision and Circular 2010 (Defra, 2010)
- Natural England's Position on Landscape (NE, 2008)
- Natural England's Position on Protected Landscapes (NE, 2010)
- National Park Management Plans, CA216 (CA, 2005)
- Guidance for the review of AONB management plans, CA221 (CA, 2006)
- AONB Management Plans: A guide, CA23 (CA, 2001)

- Duties on relevant authorities to have regard to the purposes of National parks, AONBs and the Norfolk and Suffolk Broads (Defra, 2005)
- England's statutory landscape designations: a practical guide to your duty of regard (NE, 2010)

Appendix 1:

Evaluation Framework for Natural Beauty Criterion

The sub-factors and associated indicators should be regarded as a "menu" of examples (developed from past designations and subsequent consultation) from which those appropriate to the character of the landscape under consideration should be chosen, adapted or added to. There is no "scoring" involving accumulations of indicators and it is possible for a landscape to exhibit natural beauty or offer opportunities for open air recreation even if a number of the indicators shown in this appendix are not present.

Factor	Example sub-factor	Example Indicator
Landscape quality	Intactness of the landscape in visual, functional and ecological perspectives	Characteristic natural and man-made elements are well represented throughout
	The condition of the landscape's features and elements	Landscape elements are in good condition
	The influence of incongruous features or elements (whether man-made or natural) on the perceived natural beauty of the area	Incongruous elements are not present to a significant degree, are not visually intrusive, have only localised influence or are temporary in nature
Scenic quality	A distinctive sense of place	Landscape character lends a clear and recognisable sense of place
	Striking landform	Landform shows a strong sense of scale or contrast
		There are striking landform types or coastal configurations
	Visual interest in patterns of land cover	Land cover and vegetation types form an appealing pattern or composition in relation to each other and/or to landform which may be appreciated from either a vantage point or as one travels through a landscape
	Appeal to the senses	Strong aesthetic qualities, reflecting factors such as scale and form, degree of openness or enclosure, colours and textures, simplicity or diversity, and ephemeral or seasonal interest
		Memorable or unusual views and eye-catching features or landmarks
		Characteristic cognitive and sensory stimuli (e.g. sounds, quality of light, characteristic smells, characteristics of the weather)
Relative wildness	A sense of remoteness	Relatively few roads or other transport routes
		Distant from or perceived as distant from significant habitation
	A relative lack of human influence	Extensive areas of semi-natural vegetation
		Uninterrupted tracts of land with few built features and few overt industrial or

Factor	Example sub-factor	Example Indicator
		urban influences
	A sense of openness and exposure	Open, exposed to the elements and expansive in character
	A sense of enclosure and isolation	Sense of enclosure provided by (eg) woodland, landform that offers a feeling of isolation
	A sense of the passing of time and a return to nature	Absence or apparent absence of active human intervention
Relative tranquillity	Contributors to tranquillity	Presence and/or perceptions of natural landscape, birdsong, peace and quiet, natural-looking woodland, stars at night, stream, sea, natural sounds and similar influences
	Detractors from tranquillity	Presence and/or perceptions of traffic noise, large numbers of people, urban development, overhead light pollution, low flying aircraft, power lines and similar influences
Natural heritage features	Geological and geo-morphological features	Visible expression of geology in distinctive sense of place and other aspects of scenic quality
		Presence of striking or memorable geo-morphological features
	Wildlife and habitats	Presence of wildlife and/or habitats that make a particular contribution to distinctive sense of place or other aspects of scenic quality
		Presence of individual species that contribute to sense of place, relative wildness or tranquillity
Cultural heritage	Built environment, archaeology and designed landscapes	Presence of settlements, buildings or other structures that make a particular contribution to distinctive sense of place or other aspects of scenic quality
		Presence of visible archaeological remains, parkland or designed landscapes that provide striking features in the landscape
	Historic influence on the landscape	Visible presence of historic landscape types or specific landscape elements or features that provide evidence of time depth or historic influence on the landscape.
		Perceptions of a harmonious balance between natural and cultural elements in the landscape that stretch back over time
	Characteristic land management practices	Existence of characteristic land management practices, industries or crafts which contribute to natural beauty
	Associations with written descriptions	Availability of descriptions of the landscape in notable literature, topographical

Factor	Example sub-factor	Example Indicator
		writings or guide books, or significant literature inspired by the landscape.
	Associations with artistic representations	Depiction of the landscape in art, other art forms such as photography or film, through language or folklore, or in inspiring related music
	Associations of the landscape with people, places or events	Evidence that the landscape has associations with notable people or events, cultural traditions or beliefs

Appendix 2:

Evaluation Framework for Recreation Criterion

The sub-factors and associated indicators should be regarded as a "menu" of examples (developed from past designations and subsequent consultation) from which those appropriate to the character of the landscape under consideration should be chosen, adapted or added to. There is no "scoring" involving accumulations of indicators and it is possible for a landscape to exhibit natural beauty or offer opportunities for open air recreation even if a number of the indicators shown in this appendix are not present.

Factor	Example sub-factor	Example indicator
Access to high quality landscapes	Opportunities to enjoy outstanding natural beauty	Good access (physically and/or visually) to areas that satisfy the natural beauty criterion (see Natural Beauty criterion)
	Opportunities to enjoy relative tranquillity and relative wildness	Good access (physically and/or visually) to areas that offer an experience of tranquillity or wildness (see Natural Beauty criterion)
Natural or cultural heritage features or cultural associations	Presence of a range of natural or cultural heritage features or cultural associations	Presence of natural features which enrich the experience of the landscape or contribute to understanding of special qualities or sense of place
		Presence of cultural features or cultural associations which enrich the experience of the landscape or contribute to understanding of special qualities or sense of place
	Landmarks and other features	Presence of recognised or valued landmarks or other features of interest which enrich the experience of the landscape or contribute to understanding of special qualities or sense of place
Good recreation provision	High quantity of appropriate recreation provision	Presence of extensive network of rights of way or extent of open access land over much of the area
	Diversity of good quality provision for quiet enjoyment	Opportunities to enjoy a range of high quality landscape experiences
		Opportunities to enjoy a range of different provision for quiet recreation activity
Accessibility	Accessibility to centres of population	Transport links to centres of population
		Availability of sustainable transport options providing links to centres of population
Potential for enhancement	Potential for appropriate enhancement of enjoyment and understanding	Possible plans to improve provision for access to or quiet enjoyment of the landscape so as to provide opportunities for the understanding and enjoyment of the area's special qualities, by new provision or improved management of existing

Appendix 3:

National Park and AONB Mechanisms, Powers and Duties

National Park

- **National Park purposes** must be considered by all public bodies in decisions affecting National Parks.
- If there is a conflict between the two purposes, greater weight should attach to the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the area (**Sandford principle**).
- There will usually be a dedicated **National Park Authority (NPA)** which must pursue the purposes of designation.
- There must be a **National Park Management Plan** to ensure proactive and co-ordinated management of the area.
- NPAs exercise **countryside management functions**.
- NPAs exercise **planning and development control functions**.
- There is greater protection from inappropriate development through **planning policy**.
- NPAs **manage access (physical and intellectual)**.
- An **NPA** must seek to foster the economic and social well-being of local communities within the National Park,
- There is a dedicated government **funding** stream for the NPA over and above the funds that local authorities will continue to receive funding for their remaining functions.

Area of Outstanding Natural Beauty

- **AONB purpose** must be considered by all public bodies in decisions affecting AONBs.
- AONB purpose is normally delivered through a dedicated **AONB partnership** made up of the local authorities and other stakeholders.
- There must be an **AONB Management Plan** which sets out the policy for the management of the area and which includes an action plan for carrying out activity in support of the purposes of designation.
- Most AONBs have a small core team (the **AONB unit**) which coordinate, facilitate and sometimes delivers **countryside management** functions.
- There is greater protection from inappropriate development through **planning policy**.
- There is additional **funding** for the delivery of AONB purposes through Natural England and the local authorities plus opportunities for discretionary funding from other sources.
- It is possible to establish a **statutory conservation board** where this would be desirable. This would have the additional purpose of increasing the understanding and enjoyment by the public of the special qualities of the AONB and, as with National Parks, the Sandford principle applies where this purpose comes into conflict with the purpose of conserving and enhancing the natural beauty of the area.
- AONB Conservation Boards have a duty to seek to foster the social and economic well being of local communities

Appendix 4:

Boundary Setting Considerations

Transition areas: The boundary should not be expected to be a sharp barrier between areas of differing quality. Often there will be a transition of natural beauty and opportunities for open-air recreation across a sweep of land: in those cases the boundary chosen should be an easily identifiable feature within this transition. The boundary should be drawn towards the high quality end of the transition in a manner that includes areas of high quality land and excludes areas of lesser quality land ie it should be drawn conservatively. Visual associations may also be used to help define the extent of land for inclusion in these circumstances.

Types of boundary: Wherever possible, an easily distinguishable permanent physical boundary should be chosen. Boundaries should not if possible be overly complex or convoluted. Where a boundary follows a road, the road verges and embankments may be included in the designation where they blend into the wider landscape[23] .

Other administrative boundaries: Where local government boundaries follow suitable lines, it may be administratively convenient to adopt them. In the majority of cases, however, they will be unsuitable. Similarly, land ownership is not itself a reason for including or excluding land from designation – there will often be instances where part of a landholding sits within the designated area and part sits outside.

Inclusion of settlements: A settlement should only be included if it lies within a wider tract of qualifying land (whether or not this is part of the same designation), having regard to the influence of the settlement on the land in question. Settlements should be assessed on their individual merits and particularly on their character, qualities and relationship to adjoining countryside. The extent to which countryside penetrates the built-up area may also be relevant.

Integrity of settlements: Towns or villages should not normally be cut in two by a National Park/AONB boundary. The ability of a settlement to act as a gateway to a designated area is not dependent on its inclusion with a designation. A settlement does not equate to a parish and the division of parishes is acceptable in drawing a boundary.

Incongruous development: Unsightly development on the edge of a National Park/AONB should generally be excluded unless it is of a temporary or transient nature.

Land allocated for development: Land on the margins of a National Park/AONB identified in development plans (both adopted and emerging[24]), or having the benefit of planning permission, for major built developments (including the extraction of minerals and other deposits) should normally be excluded from the Park/AONB, unless the land will be developed or restored to a land use and quality which contributes to Park/AONB purposes. Land should not be included merely to seek to protect it from specific development proposals.

Features of interest: Areas and features of wildlife, geological, geomorphological, historic, cultural or architectural value which are situated on the margins of a National Park/AONB should be included where practicable providing that they are situated within a tract that meets the statutory criteria.

Marine boundaries: In coastal areas where a marine boundary is to be drawn, the boundary should follow the mean low water mark or the County boundary in the case of estuaries.

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[23] The metalled surface of a road normally remains outside the National Park.

[24] Proposed development schemes included in emerging development plans will be afforded varying weight depending on the extent to which they have progressed through the development plan preparation process and also the extent to which any adopted plans may remain relevant.

Appendix 5:

Statutory Provisions for Designating Landscapes

This appendix reproduces extracts of legislation relevant to designating landscapes. It does not exhaustively cover all legislation relating to National Parks or AONBs.

The legislation is as it currently reads (as at October 2009) and does not show earlier versions or amendments. Provisions not specifically relevant have been left out. When required, the currently applicable legislation should always be referred to directly.

National Parks and Access to the Countryside Act 1949 (as amended)

Section 5 National Parks

(1) The provisions of this Part of this Act shall have effect for the purpose—
  (a) of conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas specified in the next following subsection; and
  (b) of promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public.

(2) The said areas are those extensive tracts of country in England … as to which it appears to Natural England that by reason of—
  (a) their natural beauty and
  (b) the opportunities they afford for open-air recreation, having regard both to their character and to their position in relation to centres of population,

it is especially desirable that the necessary measures shall be taken for the purposes mentioned in the last foregoing subsection.

(2A) Natural England may
  (a) when applying subsection (2)(a) in relation to an area, take into account its wildlife and cultural heritage, and
  (b) when applying subsection (2)(b) in relation to an area, take into account the extent to which it is possible to promote opportunities for the understanding and enjoyment of its special qualities by the public.

(3) The said areas, as for the time being designated by order made by Natural England and submitted to and confirmed by the Minister, shall be known as, and are hereinafter referred to as, National Parks.

Section 6 General duties of Natural England in relation to National Parks

(1) It shall be the duty of Natural England from time to time, to consider what areas there are in England … falling within sub-section (2) of the last foregoing section, to determine in what order they should be designated under subsection (3) of that section, and to proceed with their designation at such times as Natural England may determine.

Section 7 Designation and variation of National Parks

(1) Before making an order designating a National Park Natural England shall consult with every joint planning board and local authority whose area includes any land in the area to be designated a Park.

(2) Any such order shall describe the area to be designated a Park by reference to a map and such other descriptive matter as may appear to Natural England to be requisite.

(3) The provisions in that behalf of the First Schedule to this Act shall have effect as to the making, confirmation, coming into operation and validity of any order designating a National Park.

(4) The Minister may by order made after consultation with Natural England vary an order designating a National Park.

(5) Before making an order under the last foregoing subsection the Minister shall consult with any National Park authority for the Park in question and with every such board and council as aforesaid whose area, or any part of whose area, is comprised in the National Park, whether as existing or as proposed to be varied; and the provisions in that behalf of the First Schedule to this Act shall apply to any order under the last foregoing subsection.

(6) It shall be the duty of Natural England to secure that copies of any order such as is mentioned in this section shall be available, at the office of Natural England, at the offices of each joint planning board and local authority specified in subsection (1) or subsection (5) of this section, as the case may be at the offices (where the order is for the variation of an order designating a Park) of any National Park authority for the Park in question, and at such other place or places in or near the Park in question as Natural England may determine, for inspection by the public at all reasonable times.

(7) In this Section and Schedule 1 "local authority" means—
(a) in relation to England, a county council, district council or parish council;
(b) in relation to Wales, a county council, county borough council or community council.

Section 11A Duty of certain bodies and persons to have regard to the purposes for which National Parks are designated

(1) A National Park authority, in pursuing in relation to the National Park the purposes specified in subsection (1) of section five of this Act, shall seek to foster the economic and social well-being of local communities within the National Park, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of the National Park.

(2) In exercising or performing any functions in relation to, or so as to affect, land in any National Park, a relevant authority shall have regard to the purposes specified in subsection (1) of section five of this Act and if it appears that there is a conflict between those purposes, shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park.

(3) For the purposes of this section "relevant authority" means—
(a) any Minister of the Crown,
(b) any public body,
(c) any statutory undertaker, or
(d) any person holding public office.

(4) In subsection (3) of this section—
"public body" includes—
(a) any local authority, joint board or joint committee;
(b) any National Park authority;
"public office" means—
(a) an office under Her Majesty;
(b) an office created or continued in existence by a public general Act of Parliament; or
(c) an office the remuneration in respect of which is paid out of money provided by Parliament.

(5) In subsection (4) of this section, "joint board" and "joint committee" mean—
(a) a joint or special planning board for a National Park reconstituted by order under paragraph 1 or 3 of Schedule 17 to the Local Government Act 1972, or a joint planning board within the meaning of section 2 of the Town and Country Planning Act 1990;
(b) a joint committee appointed under section 102(1)(b) of the Local Government Act 1972.

(6) In this section, "local authority"—
(a) in relation to England, means a county council, district council or parish council;
(b) in relation to Wales, means a county council, county borough council, … or community council.

Section 114 Interpretation

(1) In this Act the following expressions have the meanings hereby assigned to them respectively, that is to say—
"area of outstanding natural beauty" means an area designated under section 82 of the Countryside and Rights of Way Act 2000;
"the Council" means the Countryside Council for Wales;
"drainage authority" means the Environment Agency or an internal drainage board;

"interest", in relation to land, includes any estate in land and any right over land, whether the right is exercisable by virtue of the ownership of an interest in land or by virtue of a licence or agreement, and in particular includes sporting rights;
"land" includes land covered by water and as respects Scotland includes salmon fishings;
"the Minister" as respects England and Wales means the Minister of Town and Country Planning, and as respects Scotland means the Secretary of State;
"National Park" has the meaning assigned to it by subsection (3) of section five of this Act;
"open-air recreation" does not include organized games;
"owner", in relation to any land, means, except in Part III of this Act or in relation to Scotland, a person, other than a mortgagee not in possession, who, whether in his own right or as trustee or agent for any other person, is entitled to receive the rack rent of the land or, where the land is not let at a rack rent, would be so entitled if it were so let, and, in Part III of this Act, as respects England and Wales means any person being either entitled to the fee simple or being a mortgagee in possession of the land and as respects Scotland has the meaning assigned to it by section twenty-six of this Act;
"vehicle" does not include a vessel, except any vessel adapted for use on land while it is being so used;
"waterway" means any lake, river, canal or other waters, being (in any case) waters suitable, or which can reasonably be rendered suitable, for sailing, boating, bathing or fishing;

(2) References in this Act to the preservation, or the conservation of the natural beauty of an area shall be construed as including references to the preservation or, as the case may be, the conservation of its flora, fauna and geological and physiographical features.

(3) References in this Act to the planting of trees shall be construed as including references to the planting of bushes, the planting or sowing of flowers and the sowing of grass and the laying of turf.

(4) References in this Act to any enactment shall be construed as references to that enactment as amended by or under any subsequent enactment including this Act.

SCHEDULE 1
PROVISIONS AS TO MAKING, CONFIRMATION, COMING INTO OPERATION AND VALIDITY OF CERTAIN INSTRUMENTS

Part I
Orders designating National Parks, Public Path Orders, Diversion Orders and Extinguishment Orders, and Access Orders

1 (1) Before—
(a) an order designating a National Park,
...is submitted to the Minister for confirmation,
the authority by whom the order was made shall give notice in the prescribed form stating the effect of the order and that it has been made and is about to be submitted for confirmation, naming places in the locality to which the order relates where copies of the order and of the map referred to therein may be inspected, and specifying the time (not being less than twenty-eight days) within which, and the manner in which, representations or objections with respect to the order may be made.

(2) Before the Minister makes an order varying an order designating a National Park, ... or an access order, he shall prepare a draft of the order and shall give notice stating that he proposes to make the order and the effect thereof, naming places in the locality to which the draft relates where a copy of the draft and of the map referred to therein may be inspected, and specifying the time (not being less than twenty-eight days) within which, and the manner in which, representations or objections with respect to the draft may be made.

(3) The notice to be given under either of the two foregoing sub-paragraphs shall be given—
(a) in the case of an order designating a National Park or an order varying such an order, by publication in the London Gazette, in two newspapers circulating in the country generally and in at least one local newspaper circulating in every county or county borough which includes any of the land to which the order relates:

(3A) Where under this paragraph any notice is required to be given by any person in respect of any land which is already in a National Park for which a National Park authority is the local planning authority, that person shall serve a copy of that notice on that authority.

2 (1) If no representations or objections are duly made, or if any so made are withdrawn, the Minister may, if he thinks fit, confirm or make the order, as the case may be, with or without modifications.

(2) If any representation or objection duly made is not withdrawn, the Minister shall, before confirming or making the order, as the case may be, if the objection is made by a local authority cause a local inquiry to be held and in any other case either—

(a) cause a local inquiry to be held, or

(b) afford to any person by whom any representation or objection has been duly made and not withdrawn an opportunity of being heard by a person appointed by him for the purpose,

and, after considering the report of the person appointed to hold the inquiry or to hear representations or objections, may confirm or make the order, as the case may be, with or without modifications:

(2A) In sub-paragraph (2) "local authority" does not include, in relation to an order designating a National Park in England, a parish council.

(3) Notwithstanding anything in the foregoing provisions of this paragraph, the Minister shall not confirm or make an order so as to affect land not affected by the order as submitted to him or the draft order prepared by him, as the case may be, except after—

(a) giving such notice as appears to him requisite of his proposal so to modify the order, specifying the time (not being less than twenty-eight days) within which and manner in which representations or objections with respect to the proposal may be made;

(b) holding a local inquiry or affording to any person by whom any representation or objection has been duly made and not withdrawn an opportunity of being heard by a person appointed by him for the purpose; and

(c) considering the report of the person appointed to hold the inquiry or to hear representations or objections, as the case may be, …

(4) Where, in the case of an access order, it is represented by the Environment Agency or a water undertaker being a water undertaking, that any land comprised in the order as submitted to the Minister or in the draft order prepared by him, as the case may be (or, where notice of a proposed modification has been given under head (a) of the last foregoing sub-paragraph, and land to which the proposed modification relates), should be excluded from the operation of the order on the ground that by reason of—

(a) the proximity of the land to any reservoir used for the purposes of the statutory undertaking carried on by that Authority or, as the case may be, undertaker, or

(b) any other physical factor affecting the flow of water from the land into any such reservoir, the operation of section sixty of this Act as respects that land would be likely to involve danger to the purity of the water supply which could not be prevented by the taking of any reasonable measures, sub-paragraph (2) of this paragraph, or head

(c) of the last foregoing sub-paragraph, as the case may be, shall have effect in relation to that representation as if it provided for the consideration of the report therein referred to by the Minister and the Secretary of State acting jointly.

(5) If, as the result of any representations or objections considered, or inquiry or other hearing held, in connection with the confirmation of an order designating a National Park or the making of an order varying such an order, the Minister is of opinion that Natural England, the Council a National Park authority, county planning authority or, in Wales, the local planning authority or any other person ought to be consulted before he decides whether to confirm or make the order either with or without modifications, he shall consult Natural England, the Council, authority or other person but, subject to the provisions of sub-paragraph (3) of this paragraph, shall not be under any obligation to consult any other person, or to afford any opportunity for further representations or objections or to cause any further inquiry or other hearing to be held.

3 As soon as may be after any such order as is mentioned in paragraph 1 of this Schedule has been confirmed or made by the Minister, the authority by whom the order was made, or, in the case of an order made by the Minister, the Minister, shall publish, in the manner required in relation to the class of order in question by sub-paragraph (3) of paragraph 1 of this Schedule, a notice in the prescribed form describing the effect of the order, stating that it has been confirmed or made, and naming a place where a copy thereof as confirmed or made may be inspected at all reasonable hours, and—

(a) where under the said sub-paragraph (3) notice was required to be served shall serve a like notice and a copy of the order as confirmed or made on any persons on whom notices were required to be served under that sub-paragraph or under sub-paragraph (3A) or (4) of paragraph 1 of this Schedule; and

(b) where under the said sub-paragraph (3) a notice was required to be displayed, shall cause a like notice to be displayed in the like manner as the notice required to be displayed under that sub-paragraph:

Provided that no such notice or copy need be served on a person unless he has sent to the authority or Minister (according as the notice or copy would require to be served by an authority or by the Minister) a request in writing in that behalf specifying an address for service.

3A An order designating a National Park shall have effect as from such time as may be determined by the Minister and specified in the notice of the confirmation of that order.

4 (1) The Minister may, subject to the provisions of this Part of this Schedule, by regulations make such provision as to the procedure on the submission and confirmation of orders to which this Part of this Schedule applies as appears to him to be expedient.

(3) In this Part of this Schedule the expression "prescribed" means prescribed by regulations made by the Minister.

Wildlife and Countryside Act 1981

Section 45 Power to vary orders designating National Park

(1) Natural England (as well as the Secretary of State) shall have power to make an order amending an order made under section 5 of the 1949 Act designating a National Park, and—

(a) section 7(5) and (6) of that Act (consultation and publicity in connection with orders under section 5 or 7) shall apply to an order under this section as they apply to an order under section 7(4) of that Act with the substitution for the reference in section 7(5) to the Secretary of State of a reference to Natural England; and

(b) Schedule 1 to that Act (procedure in connection with the making and confirmation of orders under section 5 or 7) shall apply to an order under this section as it applies to an order designating a National Park.

Countryside and Rights of Way Act 2000

Part IV
Areas of Outstanding Natural Beauty

Section 82 Designation of areas

(1) Where it appears to **Natural England** that an area which is in England but not in a National Park is of such outstanding natural beauty that it is desirable that the provisions of this Part relating to areas designated under this section should apply to it, **Natural England may**, for the purpose of conserving and enhancing the natural beauty of the area, by order designate the area for the purposes of this Part as an area of outstanding natural beauty.

(2) ...[Wales only]

(3) In this Part "area of outstanding natural beauty" means an area designated under this section as an area of outstanding natural beauty.

Section 83 Procedure for designation orders

(1) Where **Natural England** or the Council propose to make an order under section 82, or the Council shall consult every local authority whose area includes any part of the area to which the proposed order is to relate.

(2) Before making the order, **Natural England** or the Council shall then publish, in the London Gazette and in one or more newspapers circulating in the area of every such local authority, notice that they propose to make the order, indicating the effect of the order and stating the time within which and manner in which representations with respect to the proposed order may be made to **Natural England** or the Council (as the case may be), and shall consider any representations duly made.

(3) An order under section 82 shall not come into operation unless and until confirmed—
(a) in the case of an order made by **Natural England**, by the Secretary of State, or
(b) ...

(4) The Secretary of State or the National Assembly for Wales may confirm an order submitted to him or it under this section either as submitted or with such modifications as the Secretary of State or the Assembly thinks expedient.

(5) Before refusing to confirm an order under section 82, or determining to confirm it with modifications, the Secretary of State shall consult **Natural England** and every local authority whose area includes any land to which the order as submitted, or as proposed to be modified, relates.

(6) Before refusing to confirm an order under section 82, or determining to confirm it with modifications, the National Assembly for Wales shall consult the Council and every local authority whose area includes any land to which the order as submitted, or as proposed to be modified, relates.

(7) An order under section 82 may be revoked or varied by a subsequent order under that section.

(8) Without prejudice to the powers of **Natural England** or the Council to vary an order under section 82, the Secretary of State (as respects England) or the National Assembly for Wales (as respects Wales) may by order vary any order under that section made by **Natural England** or the Council; and subsection (1) applies to any order under section 82 made by the Secretary of State or the Assembly by virtue of this subsection with the substitution for references to **Natural England** of references to the Secretary of State and for references to the Council of references to the Assembly.

(9) It is the duty of **Natural England** and the Council to secure that copies of any order under section 82 relating to England or, as the case may be, to Wales, are available for inspection by the public at all reasonable times—
(a) at the office of **Natural England** or, as the case may be, the Council,
(b) at the offices of each local authority whose area includes any part of the area to which the order relates, and
(c) at such other place or places in or near that area as **Natural England** or, as the case may be, the Council may determine.

Section 86 Establishment of conservation boards

(1) The Secretary of State (as respects England) or the National Assembly for Wales (as respects Wales) may—
(a) in the case of any existing area of outstanding natural beauty, or
(b) in connection with the designation of any area as an area of outstanding natural beauty, by order establish a board (in this Part referred to as "a conservation board") to carry out in relation to that area the functions conferred on such a board by or under this Part.

(2) Schedule 13 (which relates to the constitution of conservation boards) has effect.

(3) Where the Secretary of State or the National Assembly for Wales considers it expedient for either of the purposes mentioned in section 87(1), an order under subsection (1) may—
(a) provide for the transfer to the conservation board to which the order relates of any of the functions of local authorities, so far as relating to the area of outstanding natural beauty in question, or

(b) provide for any function of a local authority, so far as relating to the area of outstanding natural beauty in question, to be exercisable concurrently by the local authority and by the conservation board.

(4) Subsection (3) does not apply to functions of a local authority under Part II, III, VII or XIII of the Town and Country Planning Act 1990 [or under Part 2 or 6 of the Planning and Compulsory Purchase Act 2004].

(5) An order under subsection (1) may make further provision as to the constitution and administration of the conservation board to which it relates, including provision with respect to—

(a) the appointment of members,
(b) the removal and disqualification of members,
(c) the conduct of members,
(d) proceedings of the board,
(e) the appointment of staff,
(f) consultation with other public bodies,
(g) records and documents of the board,
(h) the provision of information by the board, and
(i) complaints of maladministration.

(6) Before making an order under subsection (1) in relation to an area of outstanding natural beauty in England, the Secretary of State shall consult—

(a) **Natural England**, and
(b) every local authority whose area consists of or includes the whole or part of the area of outstanding natural beauty, and shall not make the order unless satisfied that the majority of those local authorities consent.

(8) An order under subsection (1) which amends or revokes a previous order under that subsection establishing a conservation board—

(a) may be made only after consultation with the conservation board to which it relates (as well as the consultation required by subsection (6) or (7)), and
(b) in the case of an order revoking a previous order, may provide for the winding up of the board.

(9) Subject to any order under subsection (10), where there is a variation of the area of an area of outstanding natural beauty for which there is or is to be a conservation board, the area of outstanding natural beauty for which that board is or is to be the conservation board shall be taken, as from the time when the variation takes effect, to be that area as varied.

(10) Where provision is made for the variation of the area of an area of outstanding natural beauty for which there is or is to be a conservation board, the Secretary of State (as respects England) or the National Assembly for Wales (as respects Wales) may by order make such transitional provision as he or it thinks fit with respect to—

(a) any functions which, in relation to any area that becomes part of the area of outstanding natural beauty, are by virtue of the variation to become functions of that conservation board; and
(b) any functions which, in relation to any area that ceases to be part of the area of outstanding natural beauty, are by virtue of the variation to become functions of a person other than that conservation board.

Section 87 General purposes and powers

(1) It is the duty of a conservation board, in the exercise of their functions, to have regard to—

(a) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, and
(b) the purpose of increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty,

but if it appears to the board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a).

(2) A conservation board, while having regard to the purposes mentioned in subsection (1), shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty, shall for that purpose co-operate with local authorities and public

bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty.

(3) Sections 37 and 38 of the Countryside Act 1968 (general duties as to the protection of interests of the countryside and the avoidance of pollution) apply to conservation boards as they apply to local authorities.

(4) The powers of a conservation board include power to do anything which, in the opinion of the board, is calculated to facilitate, or is conducive or incidental to—

(a) the accomplishment of the purposes mentioned in subsection (1), or

(b) the carrying out of any functions conferred on it by virtue of any other provision of this Part or by virtue of any enactment not contained in this Part.

(5) The powers conferred on a conservation board by subsection (4) do not include—

(a) power to do anything in contravention of any restriction imposed by virtue of this Part in relation to any express power of the board, or

(b) power to raise money (whether by borrowing or otherwise) in a manner which is not authorised apart from that subsection, but the things that may be done in exercise of those powers are not to be treated as excluding anything by reason only that it involves the expenditure, borrowing or lending of money or the acquisition or disposal of any property or rights.

(6) Schedule 14 (which relates to the supplemental and incidental powers of conservation boards) has effect.

(7) An order under section 86(1) may—

(a) make further provision with respect to the supplemental and incidental powers of the conservation board to which it relates or the limits on those powers, including provision relating to the borrowing of money, and

(b) provide for any enactment which relates to or limits the supplemental or incidental powers or duties of local authorities or relates to the conduct of, or transactions by, local authorities to apply in relation to the conservation board with such modifications as may be specified in the order.

Section 88 Orders establishing conservation boards

(1) Any power of the Secretary of State or the National Assembly for Wales to make an order under section 86(1) or (10) is exercisable by statutory instrument.

(2) No order shall be made under section 86(1) by the Secretary of State unless a draft of the order has been laid before, and approved by a resolution of, each House of Parliament.

(3) A statutory instrument containing an order made under section 86(10) by the Secretary of State shall be subject to annulment in pursuance of a resolution of either House of Parliament.

(4) If a draft of an order made under section 86(1) by the Secretary of State would, apart from this section, be treated for the purposes of the Standing Orders of either House of Parliament as a hybrid instrument, it shall proceed in that House as if it were not such an instrument.

(5) The power of the Secretary of State or the National Assembly for Wales to make an order under section 86(1) or (10) includes power to make such incidental, supplemental, consequential and transitional provision as the person making the order thinks necessary or expedient.

(6) The power of the Secretary of State or the National Assembly for Wales by an order under section 86(1) or (10) to make incidental, supplemental, consequential or transitional provision includes power for any incidental, supplemental, consequential or, as the case may be, transitional purpose—

(a) to apply with or without modifications,

(b) to extend, exclude or modify, or

(c) to repeal or revoke with or without savings, any enactment or any instrument made under any enactment.

(7) The provision that may be made for incidental, supplemental, consequential or transitional purposes in the case of any order under section 86(1) or (10) which—

(a) establishes a conservation board or provides for the winding up of such a board, or

(b) otherwise has the effect of transferring functions from one person to another or of providing for functions to become exercisable concurrently by two or more persons or

to cease to be so exercisable, includes provision for the transfer of property, rights and liabilities from one person to another.

(8) The power of the Secretary of State or the National Assembly for Wales under section 86(1) or (10) to provide by order for the transfer of any property, rights or liabilities, or to make transitional provision in connection with any such transfer or with any order by which functions become or cease to be exercisable by any conservation board, includes, in particular, power to provide—

(a) for the management and custody of any transferred property (whether real or personal);

(b) for any liabilities transferred to include liabilities under any enactment;

(c) for legal proceedings commenced by or against any person to be continued by or against a person to whom property, rights or liabilities are transferred or, as the case may be, any board or other authority by whom any functions are to become exercisable;

(d) for the transfer of staff, compensation for loss of office, pensions and other staffing matters; and

(e) for treating any person to whom a transfer of property, rights or liabilities is made or, as the case may be, by whom any functions are to become exercisable as, for some or all purposes, the same person in law as the person from whom the transfer is made or the authority by whom the functions have previously been exercisable.

(9) The power of the Secretary of State or the National Assembly for Wales to make an order under section 86(1) or (10) includes power to make different provision for different cases, including different provision for different areas or localities and for different boards.

(10) In this section "enactment" includes an enactment contained in an Act passed after this Act.

Section 92 Interpretation of Part IV and supplementary provision

(1) In this Part, unless a contrary intention appears—
"the 1949 Act" means the National Parks and Access to the Countryside Act 1949;
"area of outstanding natural beauty" has the meaning given by section 82(3);
"conservation board" has the meaning given by section 86(1);
"the Council" means the Countryside Council for Wales;
"liability", in relation to the transfer of liabilities from one person to another, does not include criminal liability;
"local authority" means a principal council within the meaning of the Local Government Act 1972;
"principal area" has the same meaning as in the Local Government Act 1972.

(2) Any reference in this Part to the conservation of the natural beauty of an area includes a reference to the conservation of its flora, fauna and geological and physiographical features.

(3) This Part does not apply in relation to any of the lands mentioned in section 112(1) of the 1949 Act (Epping Forest and Burnham Beeches).

Natural Environment and Rural Communities Act 2006

99 Natural Beauty in the Countryside

The fact that an area in England or Wales consists of or includes –

(a) land used for agriculture or woodlands,

(b) land used as a park, or

(c) any other area whose flora, fauna or physiographical features are partly the product of human intervention in the landscape,

does not prevent it from being treated, for the purposes of any enactment (whenever passed), as being an area of natural beauty (or of outstanding natural beauty).

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APPENDIX 2

13/01605/OUT

Land at Leckhampton

REPRESENTATIONS

Number of contributors	**603**
Number of objections	**587**
Number of representations	**10**
Number of supporting	**6**

Representations are listed in numerical order *by address*. All names and signatures have been redacted to ensure data protection. Representations submitted by post are grouped together in batches (1-12) and attached at the end of the main letter report.

APPLICATION NO: 13/01605/OUT	**OFFICER: Mr Craig Hemphill**
DATE REGISTERED: 17th September 2013	**DATE OF EXPIRY** : 7th January 2014
WARD: Leckhampton	**PARISH:** LECKH
APPLICANT:	Bovis Homes Limited & Miller Homes Limited
LOCATION:	Land at Leckhampton, Shurdington Road, Cheltenham
PROPOSAL:	Residential development of up to 650 dwellings; mixed use local centre of up to 1.94ha comprising a local convenience retail unit Class A1 Use (400sqm), additional retail unit Class A1 Use for a potential pharmacy (100sqm), Class D1 Use GP surgery (1,200sqm,) and up to 4,500sqm of additional floorspace to comprise one or more of the following uses, namely Class A Uses, Class B1 offices, Class C2 care home, and Class D1 Uses including a potential dentist practice, children's nursery and/or cottage hospital; a primary school of up to 1.72ha; strategic open space including allotments; access roads, cycleways, footpaths, open space/landscaping and associated works; details of the principal means of access; with all other matters to be reserved.

REPRESENTATIONS

Number of contributors	**603**
Number of objections	**587**
Number of representations	**10**
Number of supporting	**6**

1 Arden Road
Cheltenham
Gloucestershire
GL53 0HG

Comments: 17th October 2013
I am writing to object to the proposed development of land off Kidnappers Lane, Cheltenham. As a Leckhampton resident I am very concerned about the impact of increased vehicle traffic in the area if the development goes ahead. We already have congestion on Shurdington Road and Church Road and this proposal seems to place more pressure on those roads by its location next to those existing thorough fares.

Likewise as a parent of children in the area, we are constantly struggling with the lack of places at the nearest secondary schools. The proposed development would place extra pressure on Balcarras and Bournside Schools and make it even more difficult for local residents to get a place in a local school.

Considering that the Joint Core Strategy has not been finalised and includes a development in this area, I feel that the development application is premature. There is a JCS display and request for comments in the Borough Council's lobby. Is this development application taking precedence over the JCS consultation?

As a local resident I would like to see an agreed-to comprehensive plan in place that show some thought has gone into addressing the needs of the city and the region, rather than individual development applications undermining the JCS mid-consultation. If it is not the intention of the Borough Council to follow through with the JCS, let's throw it out and just focus on development applications.

1 Barnfield
Blackstone Edge Old Road
Littleborough
Lancashire
OL15 0JL

Comments: 22nd November 2013
Letter attached: BATCH 7 (18th – 22nd November)

1 Blackthorn End
Leckhampton
Cheltenham
Gloucestershire
GL53 0QB

Comments: 28th November 2013
Letter attached: BATCH 8 (25th – 29th November)

1 Blackthorn End
Leckhampton
Cheltenham
Gloucestershire
GL53 0QB

Comments: 28th November 2013
Letter attached: BATCH 8 (25th – 29th November)

1 Blackthorn End
Leckhampton
Cheltenham
Gloucestershire
GL53 0QB

Comments: 16th December 2013
I am strongly against any proposal to build on the Leckhampton fields unless absolutely necessary. The above planning application should not be considered until the astonishing discrepancy between the JCS and ONS estimated figures for the number of new homes needed is further investigated; the result of such an investigation may negate the need to build on those fields.

My objections against building on those fields is based on my experience of living very close to them and go beyond my personal enjoyment of their natural attractiveness and the opportunities they offer for farming and recreation. Those fields are a natural soak away for the water flowing off Leckhampton and, particularly, Crippets Hills. I experienced the 2007 floods in those fields and in the Warden Hill estate and have several times since then seen the excessive water-logging of those fields after heavy rainfalls. I am not convinced that the developers' plan for controlling such flood water would be wholly successful at such times.

A major obstacle for all such plans that I have seen over the years is the unsuitability of the local road system. The A46 is already extremely busy during rush hour periods and is a narrow road which inevitably bottlenecks into an even narrower section as it approaches the top of the Bath Road. The huge number of houses proposed in this development plan (along with a further 795 planned for the Chargrove area) would add considerably to the traffic congestion and increase the air pollution to an unacceptable level during peak periods on the A46, Moorend Park Road and the Bath Road. Church Road running through Leckhampton Village (a key link for drivers

wishing to get to Swindon and the M4) is unavoidably very narrow and heavily congested at rush hours. The developers propose to block off Kidnappers Lane in order to encourage traffic from the proposed estate to use the A46 and Moorend Park Road for such a journey; however, there is nothing to stop such traffic using Farm Lane to approach Church Road.

Finally, all the plans I have seen have ignored the need for a secondary school (both Bournside and Balcarras Schools are over-subscribed). Apparently all the children living in the proposed development will conveniently be of primary age! The proposed primary school would need to be built well in advance

1 Charlton Gardens
Cheltenham
Gloucestershire
GL53 9FB

Comments: 22nd October 2013
Letter attached: BATCH 3 (21st – 25th October)

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

1 Charnwood Road
Cheltenham
Gloucestershire
GL53 0HN

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

1 Chatsworth Drive
Cheltenham
Gloucestershire
GL53 0AG

Comments: 17th October 2013
We strongly object to this development and would like to comment in particular on the traffic issue as I believe there is a consultation due.

The current situation is that Shurdington Road is a car park at rush hour. Church Road is gridlocked at rush hour and frustrating at the best of times. As a pedestrian on Church Road I have been approached at speed on the PATH by vehicles using the path as a road (whilst taking my daughter to school). Pollution levels on these roads already exceed EU safe levels.

Nothing is being done to alleviate this situation now and the building of this development can only make things a lot worse.

The developers have not given satisfactory answers to these problems, putting in a few widened paths will actually make it even worse for cars to get past.

Surely it is madness not to address this issue before allowing this development to go ahead. Do we really want to make Cheltenham like London?

I would like to write our full objection to this development at a later date.

Comments: 21st October 2013
We strongly object to this development and all others in the area. It is a shame that residents are having to repeatedly write in to defend this area and I fear that many people will find they do not have the time to write yet another comment.

This application needs to be considered alongside all the other proposals for the area and I urge the council to take into consideration all comments made on the Brizen Farm application on Tewkesbury BC, which are relevant to this app.

It seems that CBC is intent on ruining south Cheltenham. This is a sought-after area to live because of its proximity to the hill, the AONB, and green space which enriches people's lives by bringing the countryside and wildlife to our homes. The character of Leckhampton will be lost forever if this development goes ahead. We can not continue to keep building housing estates like this forever so please save these fields. The developers have no concern for the loss of green space and its wildlife; they can't even leave Lotts Meadow alone!

There are still huge issues which have not been addressed:

- How will the roads cope, which are already gridlock and dangerous?
- How will we reduce pollution which already exceeds EU levels?
- How will we cope with more flooding, this area is waterlogged?
- Where will we find school places? Will this new primary school be ready to take pupils as soon as they move in? I doubt it, they will be taking local places until the new school is ready.

These points are ALREADY an issue with the current levels of housing and traffic.

We are not just talking about 650 houses; there are more a Brizen, Farm Lane and Up Hatherley Way to add to the problem.

There are several statements in the JCS which if applied to this development would stop it from going ahead.

We urge this council to turn down this application.

1 Hannam Close
Cheltenham
Gloucestershire
GL53 9AS

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

1 Japonica Drive
Up Hatherley
Cheltenham
Gloucestershire
GL51 3WD

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

1 Jasmin Way

Up Hatherley
Cheltenham
Gloucestershire
GL51 3HZ

Comments: 22nd October 2013
Letter attached: BATCH 3 (21st - 25th October)

1 Kenelm Gardens
Cheltenham
Gloucestershire
GL53 0JW

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

1 Liddington Close
Cheltenham
Gloucestershire
GL53 0AH

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

1 Merestones Close
Cheltenham
Gloucestershire
GL50 2ST

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

1 Peregrine Road
Cheltenham
Gloucestershire
GL53 0LW

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

1 Southern Road
Cheltenham
Gloucestershire
GL53 9AN

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

1 Southfield Approach
Cheltenham
Gloucestershire
GL53 9LN

Comments: 11th December 2013
I wish to object to the proposed development for a number of reasons.

1. Traffic congestion - Shurdington Road, Moorend Park Road and the alternative route to the A417/M5 along Church Road are already seriously congested, with pollution levels at times above EU limits. A development of 650 homes, many of which will have 2 cars, will make an already congested situation gridlocked. Add further traffic if the GP surgery moves (in its current location many people can walk to it) and for the proposed school and care home, and the result will be gridlock at peak times. The traffic expert at the recent public meeting said the road was at capacity but that doesn't stop developers suggesting more traffic if it can be 'mitigated': how can adding any more traffic, however mitigated, to a road at capacity make sense?

2. Flooding risk - in 2007 my mother in law in Warden Hill had to take in her neighbour when the maisonette below hers flooded. The fields handle the run-off from the hills but even they can't always cope. The developers are unsure how well their proposed ponds will work as they'd be below the water table. This is a huge risk to take in an area already proven to flood - never mind the potential impact on one of our main trunk roads, which is already at capacity.

3. The estimates for new homes are unproven and over-estimated, well beyond those the ONS estimates we need. And where are the jobs in Cheltenham for all these people? The new development in Hatherley still isn't full, and the new development on Pilley Lane will fill some of this demand when they're completed shortly. There are also industrial and brownfield sites that surely should be considered before building on our green spaces?

I am personally affected and deeply concerned about the impact of this development and strongly support the case for preserving the land as a Local Green Space.

1 Southfield Close
Cheltenham
Gloucestershire
GL53 9LE

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

1 The Firs
Old Station Drive
Cheltenham
Gloucestershire
GL53 0AU

Comments: 30th October 2013
I am writing to express my very great concern at the outline planning application submitted for a development off Kidnappers Lane and the small holdings area for 650 houses.

As you are no doubt aware, the traffic levels in the Leckhampton area are already extremely problematic. I commute to the centre of Cheltenham from Leckhampton by bicycle and was forced to change my working hours to a less busy time because I was so concerned about safety

issues from the number of cars and the speed at which they drive, not to mention the unpleasant and unhealthy levels of air pollution.

I understand that proceeding with the above development would lead to an additional estimated 1,000 vehicles exiting onto the Shurdington Road. This can only result in making the existing situation worse; morning queues will lengthen, and frustrated drivers will pose a real hazard to pedestrians (including local school children) and cyclists.

Furthermore, whilst the planning application may include the construction of a new primary school, there are already insufficient secondary school places for children in the town, and this problem will only be worsened by an influx of residents associated with the new development. The number of jobs in Cheltenham is also falling, and building houses on the periphery of the town will just create commuter dormitories for the M5.

I am certainly not ignorant of the fact that more housing needs to be created to accommodate the rising population within the town and to contribute towards the economy of the area, but I believe that this particular application is premature and should not go before the Planning Committee until the JCS for the area has been finalised and the aspects of planning, transport, environment and population estimates verified.

1 The Firs
Old Station Drive
Cheltenham
Gloucestershire
GL53 0AU

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

1 Treelands Drive
Cheltenham
Gloucestershire
GL53 0DA

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

1 Vineries Close
Cheltenham
Gloucestershire
GL53 0NU

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

1 Woodlands Road
Cheltenham
Gloucestershire
GL51 3RT

Comments: 2nd October 2013
We strongly object to this whole application, as we would probably be one of the most affected families if this should go ahead, with our main outlook located directly opposite the proposed

three-storey buildings. The view that we currently enjoy from our bedroom window is one which we would very much love to keep - the wonderful hills, the pigs, the deer and foxes running around the fields - it would all be gone and this would make us very sad.

Should this be approved we would plea that these buildings be only two storeys high.

There are too many houses with not enough supporting infrastructure. The houses would be so close together and with cars parked outside would not allow emergency service vehicles such as fire trucks to get through.

These fields are full of water in the winter and will be so even more if this is all concreted over.

The traffic along Shurdington Road is already gridlocked in both directions outside our house every weekday morning and this development will make it so much worse, with increasing noise and air pollution. It is virtually impossible to pull out onto this road so if this does go ahead, then mini roundabouts should be installed together with a 30 MPH limit.

There is provision for primary school children but no additional provision for secondary school age children - where are they supposed to go when the local secondary schools are already over-subscribed?

These are such wonderful fields and there are plenty more areas which could be used instead of here. It would make far more sense to bring back into use all of the empty houses that we currently have around the county.

There is no need for additional shops and supermarkets and there are plenty of office block buildings which are unoccupied, so we don't need more of them either.

We urge this application to not be approved.

10 Allenfield Road
Cheltenham
Gloucestershire
GL53 0LY

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

10 Blackthorn End
Leckhampton
Cheltenham
Gloucestershire
GL53 0QB

Comments: 30th October 2013
With regards to the above application as a local resident I have grave concerns with regards traffic implications from this proposal, specifically the Shurdington Road which is already heavily congested and secondly with regards to the implications for secondary education provision in the area.

This application is premature, and should not go before the Planning Committee until the Joint Core Strategy for the area of Cheltenham, Tewkesbury and Gloucester has been finalised. Also all aspects of planning, transport, environment and the population estimates contained in the housing targets have been verified.

10 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

10 Eynon Close
Cheltenham
Gloucestershire
GL53 0QA

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

10 Fairfield Park Road
Cheltenham
Gloucestershire
GL53 7PQ

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

10 Hobby Close
Cheltenham
Gloucestershire
GL53 0LP

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

10 Oxford Way
Cheltenham
Gloucestershire
GL51 3HJ

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

10 Pickering Road
Cheltenham
Gloucestershire
GL53 0LB

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

10 The Lanes
Cheltenham
Gloucestershire
GL53 0PU

Comments: 12th December 2013
I write to register my strong objection to the above planning application. My objection is on a number of counts which I have detailed below.

Given the evidence from the 2011 census and the Office of National Statistics (ONS) projections on future housing need in Cheltenham, the proposed development is unnecessary. The huge uncertainties over housing need, traffic and transport, schooling and other infrastructure must first be properly resolved. There is no real certainty about the level of housing demand in 20 years and many variables that could impact this which cannot be easily modelled - for instance, the state of the economy, the level of domestic and international migration, social trends. JCS assumptions on household size, employment growth and birth rate are also flawed and poorly evidenced. Many more houses are currently being built than inwards migration demands and moreover jobs in Cheltenham are shrinking. Current projections based on interim, short term figures are unacceptable. Verification by the ONS of JCS population projections over the next 20 years must be taken up and evidence from the Strategic Housing Market Assessment (SHMA) used to inform estimates of housing need.

I am concerned that Cheltenham Borough has joined Tewkesbury and Gloucester to produce the JCS for the whole area but does not currently have an NPPF (National Planning Police Framework) compliant plan even though the JCS needs to be NPPF compliant. This must make local planning, which is required by the NPPF 'to meet objectively assessed needs with sufficient flexibility to adapt to rapid change' impossible. There is also no clear brownfield policy - one must be provided prior to the JCS being finalised.

The traffic congestion in peak periods which would be created by this development, along with the other proposed developments in Hatherley, Brockworth and other areas south of Cheltenham, would be horrendous and totally unacceptable. Cheltenham does not have the road infrastructure for this level of development and no solution is offered by the planning application of the already substantial and painful traffic problems in and out of south Cheltenham. The suggestions that are provided in the planning application for preventing traffic overload and gridlock in Church Road are questionable and tenuous. I am concerned that that the risk of accidents from increased traffic queues and pollution to the many elderly people who live in this area and children who walk daily to school will rise, as well as traffic incidents for commuters who have no option but to drive to work. There will undoubtedly be a knock-on impact elsewhere in the area, for example, Moorend Park Road. Queues leading to this area, in and out of Cheltenham, at peak times are already long. I was concerned to learn that transport and traffic modelling will not be available until after the JCS consultation has finished. Surely, this should be a pre-requisite to any planning.

Traffic pollution in these same areas (A46, Moorend Park Road, Church Road) can only increase with the increase in slow moving and stationary traffic. It is well publicised that Borough Council figures show that pollution levels already exceed EU-permitted limits at the Moorend Park Road junction, while pollution in Church Road is also above EU limits during winter months.

Finally, the Leckhampton fields are valued for their amenity, landscape, ecological and historical value by both the local community and visitors to the area. I and my husband and our friends regularly use the Leckhampton fields for recreation. I strongly support Leckhampton with Warden Hill and Shurdington parish councils submission of a Neighbourhood Planning Concept Plan, which includes an evidenced proposal for the Leckhampton fields to be protected as a Local Green Space of Special Community Value. I urge Cheltenham Borough Council to give this due and proper consideration.

In summary, this application is premature and should not go before the Planning Committee until the Joint Core Strategy for Cheltenham-Tewkesbury-Gloucester City has been finalised. In addition, all aspects of planning, transport, environment and population estimates in the housing targets must first be verified and robustly evidenced. I and other members of the public in this part of Cheltenham must have confidence that housing targets being proposed in the JCS are objective, transparent and in accordance with the needs of the area and not based on flawed and unsound assumptions.

102 Shurdington Road
Cheltenham
Gloucestershire
GL53 0JH

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

103 Charlton Lane
Cheltenham
Gloucestershire
GL53 9EE

Comments: 8th November 2013
Letter attached: Batch 5 (4th - 8th November)

104 Shurdington Road
Cheltenham
Gloucestershire
GL53 0JH

Comments: 15th October 2013
Letter attached: BATCH 2 (14th - 18th October)

105 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PF

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

105 Promenade
Cheltenham
Gloucestershire
GL50 1NW

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

108 Farmfield Road
Cheltenham
Gloucestershire
GL51 3RA

Comments: 22nd November 2013
Letter attached: BATCH 7 (18th - 22nd November)

109 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PE

Comments: 16th October 2013
Letter attached: BATCH 2 (14th - 18th October)

109 Painswick Road
Cheltenham
Gloucestershire
GL50 2EX

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

11 Allenfield Road
Cheltenham
Gloucestershire
GL53 0LZ

Comments: 25th November 2013
Our objections to this application are several.

We have used the Leckhampton green fields for recreation for our whole lives. Our children (and our dog!) are doing the same. The loss of this green space will be truly devastating and will destroy the area for us, many other families who live in Leckhampton (and beyond) and of course the wildlife that lives there.

Beyond the private schools and Pate's, Cheltenham secondary schools already worry us both in terms of capacity and quality. Additional people in the area will greatly magnify this problem. We fail to see how such scale of development can be considered by the Council until a clear strategy and implementation plan to service Cheltenham's secondary education is in place.

Pollution levels are already too high on Shurdington Road and Church Road. This is already a major concern for people who live in Leckhampton, particularly families such as ours with young children. An extra 1000 cars exiting onto Shurdington Road does not bear thinking about. This is before considering the increase in traffic and the associated impact on travel times and road safety. The affect on workers and parents who live in Leckhampton and need to travel by car to work and to drop children at nursery or school in the morning will be significant and clearly unacceptable. In our case we need to do both, which will be the situation for a lot of parents. We cannot travel anywhere without using Moorend Park Road and it appears that Moorend Park Road would be gridlocked every morning.

Development on this scale on the Leckhampton green fields will destroy the identity of Leckhampton as a village and suburb of Cheltenham. Such green and relatively affluent suburbs help give Cheltenham its identity and make Cheltenham an attractive place for relatively affluent people to want to live (and of course spend money in the Cheltenham economy).

These proposals will have an unacceptable impact on the quality of life for the existing residents of Leckhampton but will also impact on Cheltenham as a whole.
For those of us who were born in Cheltenham and have worked hard throughout our whole lives so we can afford to live in Leckhampton and raise our children here, such scale of development is shocking.

Notwithstanding the above we quite frankly find it unbelievable that this application could be approved, or even considered, given the holes in the basis of the JCS, particularly (but not only) the basis behind the calculation and over-estimation of the housing need in Cheltenham. We would question the legal viability of an approval to this application.

11 Arden Road
Cheltenham
Gloucestershire
GL53 0HG

Comments: 23rd October 2013
Letter attached: BATCH 3 (21st - 25th October)

11 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 24th October 2013
Letter attached: BATCH 3 (21st - 25th October)

11 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 24th October 2013
Letter attached: BATCH 3 (21st - 25th October)

11 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 24th October 2013
Letter attached: BATCH 3 (21st - 25th October)

11 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 24th October 2013
Letter attached: BATCH 3 (21st - 25th October)

11 Fairfield Walk
Cheltenham
Gloucestershire
GL53 7PF

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

11 Hall Road
Cheltenham
Gloucestershire
GL53 0HE

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

11 Highwood Avenue
Cheltenham
Gloucestershire
GL53 0JJ

Comments: 17th October 2013
I would like to object in the strongest possible terms to any and all development on the land between Shurdington Road and Church Road in Leckhampton. The reasons for my objection are as follows.

This is valuable green belt land around our town, and the loss of habitat would be disastrous to local wildlife. In addition, many people, including myself, use that land for walking and for leisure, and its loss would lessen our quality of life in this area.

There is already a flood risk in this area, and a stream that runs along side this area which in times of heavy rain already floods our garden. Building 1100 houses and the services to provide them will cause acres of run-off, and cause flooding to the new homes and existing homes. Your last consultation was flawed in respect to flooding. The report said that there was no danger of flooding along that stretch but failed to note that in times of heavy rain, ground water rises from a drain on Shurdington Road at the top of Woodlands Road, and drains away into another drain further down Shurdington Road. The water authorities say that is not a burst pipe, it is ground water from the rain which currently soaks away into a drain. If you build on that land the water will have nowhere to go, and that land will flood, as well as the land around it and along Shurdington Road. Building ponds for 100 year storms is patently inadequate when we had 3 100 year storms last winter.

The proposed junior school is all very well, but where will these children go at aged eleven? Bourneside, Chosen Hill and Balcarras Schools are already at capacity. When we are sending children across town already to Pittville, is there really room for hundreds more?

Shurdington Road and Bath Road are already groaning with traffic at maximum capacity. Thousands more cars a day will bring these roads to a gridlock situation; the smallest disruption through accident or road works already cause tailbacks that can stretch for miles, and that even during the weekend. The situation with traffic pollution on those roads is already above EU levels; 1000 new cars would make it worse. This will be even worse if, as proposed, they change the traffic flow at the Air Balloon Roundabout, sending yet more cars down Shurdington Road towards Bath Road and town.

We don't need more houses. There are plenty of houses for sale in the area; the estate agent pages make up most of the local paper on Wednesdays as it is, and too few people to buy them. And family dynamics are changing; significant numbers of people are living at home for longer because they cannot afford to leave. Building thousands of new homes will not significantly bring down the prices to put them in range of these first time buyers. We have no idea what the housing needs in the future will be; destroying valuable land now for future needs that may never be realised is madness.

We have objected again and again to these plans. To threaten this land again is unacceptable.

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

11 Highwood Avenue
Cheltenham
Gloucestershire
GL53 0JJ

Comments: 17th October 2013
I am against any development on the land between Shurdington Road and Church Road in Leckhampton. The reasons for my objection are as follows.

This is valuable Green Belt land around our town, and the loss of habitat would be disastrous to local wildlife. In addition, many people, including myself, use that land for walking and for leisure, and its loss would lessen our quality of life in this area. We buy our meat from local butchers who source from livestock kept in the fields that Newbridge proposed building over.

Shurdington Road and Bath Road are already groaning with traffic at maximum capacity. Hundreds more cars a day will bring these roads to a gridlock situation; the smallest disruption through accident or road works already cause tailbacks that can stretch for miles, and that even during the weekend.

There is already a flood risk in this area, and a stream that runs along side this area which in times of heavy rain already floods our garden. Building 175 houses and the services to provide them will result in more run-off, and risk flooding to the new homes and existing homes.

Bournside, Chosen Hill and Balcarras Schools are already at capacity.

We have objected again and again to similar plans. To threaten this land again is unacceptable. If this application goes through, this and other developers will be pressing hard to have their plans for 1000+ further houses built in the same surroundings. Please do not set us on this slippery slope. Please protect this green area of Cheltenham.

11 Mead Road
Cheltenham
Gloucestershire
GL53 7DU

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

11 Nourse Close
Cheltenham
Gloucestershire
GL53 0NQ

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

11 Vineries Close
Cheltenham
Gloucestershire
GL53 0NU

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Comments: 22nd November 2013
Letter attached: BATCH 7 (18th - 22nd November)

11 Westbury Road
Cheltenham
Gloucestershire
GL53 9EN

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

114 Charlton Lane
Cheltenham
Gloucestershire
GL53 9EA

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

114 Salisbury Avenue
Cheltenham
Gloucestershire
GL51 3BY

Comments: 8th November 2013
Letter attached: Batch 5 (4th - 8th November)

116 Caernarvon Road
Cheltenham
Gloucestershire
GL51 3JR

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

12 Fairfield Park Road
Cheltenham
Gloucestershire
GL53 7PQ

Comments: 14th October 2013
I wish to strongly OBJECT to the above planning application for 650 houses off Kidnappers Lane in Leckhampton for the following reasons:

1) This is a significant development which should NOT go to the planning committee until the JCS for the area has been finalised. This will determine what development is required in each area.

2) This proposal is a significant development in green belt land and out of proportion with the existing landscape.

3) This development will have a significant impact on the local environment removing green fields for recreation, increasing traffic beyond over-capacity levels (an extra 1000 vehicles onto the already congested A46), adding to air pollution breaking EU levels and overstretching secondary school capacity to breaking point.

I trust my objections will be lodged accordingly and the planning committee will reject this application.

12 Frampton Mews
The Reddings
Cheltenham
Gloucestershire
GL51 6UG

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

12 Gordon Road
Cheltenham
Gloucestershire
GL53 0ES

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

12 Hall Road
Cheltenham
Gloucestershire
GL53 0HE

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

12 Justicia Way
Up Hatherley
Cheltenham
Gloucestershire
GL51 3YH

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

12 Merlin Close
Cheltenham
Gloucestershire
GL53 0NF

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

12 Merlin Way
Cheltenham
Gloucestershire
GL53 0LT

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

12 Moorend Grove
Cheltenham
Gloucestershire
GL53 0EZ

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

12 Moorend Road
Cheltenham
Gloucestershire
GL53 0EU

Comments: 15th October 2013
Letter attached: BATCH 2 (14th - 18th October)

12 Southcourt Close
Cheltenham
Gloucestershire
GL53 0DW

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

12 Tayberry Grove
Up Hatherley
Cheltenham
Gloucestershire
GL51 3WF

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

123 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0DQ

Comments: 13th December 2013
Letter attached: BATCH 10 (9th - 13th December)

124 Farmfield Road
Cheltenham
Gloucestershire
GL51 3RB

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

125 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0DQ

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

126 Warden Hill Road
Cheltenham
Gloucestershire
GL51 3EH

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

127 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0NY

Comments: 22nd October 2013
Letter attached: BATCH 3 (21st - 25th October)

128 Canterbury Walk
Cheltenham
Gloucestershire
GL51 3HF

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

12A Moorend Street
Cheltenham
Gloucestershire
GL53 0EG

Comments: 22nd October 2013
Letter attached: BATCH 3 (21st - 25th October)

13 Halland Road
Cheltenham
Gloucestershire
GL53 0DJ

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

13 Hawkswood Road
Cheltenham
Gloucestershire
GL51 3DT

Comments: 25th October 2013
Letter attached: BATCH 3 (21st - 25th October)

13 St Albans Close
Cheltenham
Gloucestershire
GL51 3DW

Comments: 22nd November 2013
Letter attached: BATCH 7 (18th - 22nd November)

130 Warden Hill Road
Cheltenham
Gloucestershire
GL51 3EH

Comments: 31st October 2013
I am writing to voice my objections to the proposed development of new homes being built on Leckhampton fields. Reference 13/01605/OUT

As a local resident I frequently travel by car from Warden Hill to Leckhampton and beyond, using the current roads and am aware of the congestion which already exists along these routes. I believe that any increase in traffic would be a massive price to pay to gain new homes in this area. As a cyclist I am aware of the limited road space, and there are no footpaths along some of the 'back routes'- as there is only just space for two cars to pass as it is. At present it is a relatively safe area for young people to get out on their bicycles, learning independence and getting exercise in a rural setting. This would be lost, I fear.

The area is highly valued as a beautiful space as it stands, and should not be developed. It gives access to the countryside and country walks to those living modestly locally, which is of great value and benefit. The walks across the fields and up the hill are a pleasure and should be treasured and preserved.

Furthermore, there are other issues of concern to me, such as potential flooding, pressure on over subscribed schools and provision of other amenities. I am afraid that the need for housing is not great enough for us to lose what we have here.

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

131 Salisbury Avenue
Cheltenham
Gloucestershire
GL51 3BZ

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

132 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0BX

Comments: 8th November 2013
Letter attached: Batch 5 (4th - 8th November)

14 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

14 Chatsworth Drive
Cheltenham
Gloucestershire
GL53 0AG

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

14 Moorend Street
Cheltenham
Gloucestershire
GL53 0EG

Comments: 20th November 2013
I wish to object to the proposed development of 650 homes on the Leckhampton Fields on the following grounds:

Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the Joint Core Strategy (JCS) is approved and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in peak periods. The planning application offers no solution to these grave traffic problems. I am very concerned by the resulting health and accidents risks.

I strongly support the case made in the Leckhampton with Warden Hill and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and views from Leckhampton Hill.

14 Norwich Drive
Cheltenham
Gloucestershire
GL51 3HE

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

14 Nourse Close
Cheltenham
Gloucestershire
GL53 0NQ

Comments: 25th October 2013
Why are you not listening to us? WE DO NOT WANT THESE HOUSES HERE. You are supposed to represent us. You are supposed to be working for us. The Lib Dems promised us they would fight development in this area and on other areas of Cheltenham's greenbelt land. YOU HAVE BROKEN YOUR PROMISES TO US. WE WILL NOT VOTE FOR YOU AGAIN!

I feel SO let down. I feel SO STRONGLY that you are ruining our beautiful town. Where are our green spaces going to be? Who will buy these houses? There are new developments all over the place already which the developers CANNOT SELL. Why? BECAUSE NOBODY WANTS THEM!

This particular development proposal for Kidnappers Lane is ridiculous, particularly as it proposes to close Kidnappers Lane where it meets Church Road and Shurdington Road. This will push more traffic onto Farm Lane and other surrounding roads. It does not solve the traffic flow problems which the developers acknowledge already exist and will be made worse by the development. All it does is shift the problem onto other roads. The roads here cannot take any more vehicles, let alone 1000. What assurance can you give me that the existing traffic flow and the effect on it of this development has been properly studied before this development goes ahead? Already it is extremely difficult to turn right from Kidnappers Lane onto Shurdington Road, even outside rush hours and the developers are proposing to put in extra traffic lights but they have told me that they cannot put in anything as sophisticated as the ones at the Moorend Road crossroads. How then, are they going to deal with the back up of traffic from the lights into Shurdington? Can you assure me that these issues have been investigated?

I understood that we are already breaking EU levels on pollution in this area. How then can we justify adding another 1000 vehicles? The children are being taught at school that we must conserve energy because all the cars are creating pollution and it is damaging the ozone layer. How do we explain the extra traffic to them? This is THEIR world and THEIR future environment.

There is no secondary school planned for this development. Where are the children going to go?

I thought that the JCS was not yet agreed. If not, then this development should not be allowed to go ahead. THE DEVELOPERS SHOULD NOT BE DECIDING CHELTENHAM'S FUTURE. WE SHOULD.

Cheltenham should be known for its green spaces and countryside, not its urban sprawl.

This area of Cheltenham is particularly attractive, abutting the Leckhampton Hill AONB and providing a link for Cheltenham to the Cotswolds. How can Cheltenham call itself a centre for the Cotswolds if the route between Cheltenham and the Cotswolds is banal housing developments with no green spaces apart from the gardens in the centre of the town.

THIS IS OUR TOWN. YOU HAVE NO RIGHT TO SPOIL IT.

Why are you not listening to the CPRE and the Gloucestershire Wildlife Association? They are campaigning against developments just such as these. They are in the WRONG PLACE.

LEGLAG has worked conscientiously and carefully to produce proposals for a Country Park in this area. Why are you not listening to their wisdom and experience and expertise?

Cheltenham should be forced to build on its brownfield sites before ruining areas like this one FOR EVER.

I understand there is a new motorway junction going in on the northwest side of Cheltenham. That would provide a much better location and infrastructure for development.

I expect confirmation from you that my comments have been received and will be considered.

14 Pilford Road
Cheltenham
Gloucestershire
GL53 9AQ

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

14 Pilford Road
Cheltenham
Gloucestershire
GL53 9AQ

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

14 Southcourt Drive
Cheltenham
Gloucestershire
GL53 0BT

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

14 Vineries Close
Cheltenham
Gloucestershire
GL53 0NU

Comments: 30th October 2013
I would like to express my extreme concern about the planning application to build on green land in Leckhampton.

I do not accept that we as a country need to build more houses than those that can be sustainably provided on brownfield sites. I think it is shocking and disgraceful that government policies dictate that we must continually see the loss of our beautiful countryside. Once these green fields are built on they will never again be able to be enjoyed by generations to come. The quality of life for the residents of Cheltenham will gradually deteriorate to such an extent that this beautiful town will no longer be the desirable place to live that it currently is. The roads are already far too busy and traffic jams are becoming a daily feature of life. My daily journey to work has worsened beyond all recognition in recent years and this can only get worse with more building.

There are many species of wild life in the Leckhampton area and I despair as to where they will all be able to relocate to.

This application is premature, and should not go before the Planning Committee until the Joint Core Strategy for the area of Cheltenham, Tewkesbury and Gloucester has been finalised. Also all aspects of planning, transport, environment and the population estimates contained in the housing targets have been verified.

140 Broad Oak Way
Cheltenham
Gloucestershire
GL51 3LL

Comments: 30th October 2013
I am writing to object to the proposed planning application for building of the residential development & various retail units. This area is a key area for so many endangered or at risk species of both bird, mammal & plant life. We should be protecting this area not destroying it. As this land is on the edge of AONB it should be preserved as it contributes to the overall setting.

It is also an area which absorbs the run off of excess water from Leckhampton Hill is heavy rain, if built on, the natural green prevention of flooding will be disrupted and will have a devastating effect on local communities.

The local people do not want this development & whilst I realise this may not be an official reason for refusing planning permission it should be a consideration. At the moment this area is in a rural setting which is a key reason why the existing residents moved or stayed in this area. By building these urban extensions it destroys the very essence of why Cheltenham is so well loved.

Even with the proposed primary school within this development & I am assuming that the actual funding for the running of the school will fall to local government which is debatable if this is economically viable there is no provision in the locality for additional secondary school provision. With all the local secondary schools at bursting point t will mean more movement on the local roads which cannot cope with the existing traffic. The infrastructure is not there to provide the needs for additional doctors & hospital facilities this scale of development would warrant.

146 Farmfield Road
Cheltenham
Gloucestershire
GL51 3RB

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

149A Leckhampton Road
Cheltenham
Gloucestershire
GL53 0AD

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

14A Winchester Way
Cheltenham
Gloucestershire
GL51 3HA

Comments: 8th November 2013
Letter attached: Batch 5 (4th - 8th November)

15 Allenfield Road
Cheltenham
Gloucestershire
GL53 0LX

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

15 Canterbury Walk
Cheltenham
Gloucestershire
GL51 3HQ

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

15 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PS

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

15 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PS

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

15 Collum End Rise
Leckhampton
Cheltenham
Gloucestershire
GL53 0PA

Comments: 27th December 2013
Letter attached: BATCH 11 (14th - 20th December)

15 Hall Road
Cheltenham
Gloucestershire
GL53 0HF

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

15 Hall Road
Cheltenham
Gloucestershire
GL53 0HF

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

15 Japonica Drive
Up Hatherley
Cheltenham
Gloucestershire
GL51 3WD

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

15 Nourse Close
Cheltenham
Gloucestershire
GL53 0NQ

Comments: 13th December 2013
Letter attached: BATCH 10 (9th - 13th December)

15 Short Street
Cheltenham
Gloucestershire
GL53 0DY

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

15 Southfield Close
Cheltenham
Gloucestershire
GL53 9LE

Comments: 6th December 2013
Letter attached: BATCH 9 (2nd - 6th December)

15 The Close
Cheltenham
Gloucestershire
GL53 0PH

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

15 Vineries Close
Cheltenham
Gloucestershire
GL53 0NU

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

155 Salisbury Avenue
Cheltenham
Gloucestershire
GL51 3DG

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

16 Hall Road
Cheltenham
Gloucestershire
GL53 0HE

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

16 Hazlewood Close
Cheltenham
Gloucestershire
GL51 3RX

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

16 Nourse Close
Cheltenham
Gloucestershire
GL53 0NQ

Comments: 31st October 2013
The application for development off Kidnappers Lane, Application No. 13/01605/OUT should not be considered until after the Joint Core Strategy for the area of Cheltenham, Tewkesbury and Gloucester City has been finalised. This will require verification of the transport, environment and population estimates in the housing targets.

The development itself will result in an increase in traffic congestion onto the Shurdington Road.

Additionally, the retail units and primary school will result in additional traffic from outside of the proposed site adding to the traffic congestion.

All this additional traffic will exacerbate the already high levels of air pollution on the A46.

The primary school does not address the insufficient senior school places, both at Balcarras and Bournside

16 Sissinghurst Grove
Cheltenham
Gloucestershire
GL51 3FA

Comments: 18th October 2013
Simply to repeat the cogent points that the vast majority of the (so far) 92 Public Comments have already made:

Quality of life of Cheltenham residents negatively affected

Flood risk issues exacerbated

Shortage of secondary school places to take the proposed junior school leavers.

Traffic congestion in this area has to be reduced in future. This will simply make the situation worse, with associated issues of emission pollution, lost economic time and reduced road safety.

Are thousands of new homes really needed? The JCS predictions are not agreed by all to be realistic, including some government department projections and census data.

Essentially there is significant local opposition to these proposals. It is an affront to our local democracy not to respect these views.

Comments: 7th November 2013
Letter attached: BATCH 1 (3rd - 11th October)

16 Southern Road
Cheltenham
Gloucestershire
GL53 9AW

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

16 Tamarisk Close
Up Hatherley
Cheltenham
Gloucestershire
GL51 3WL

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

16 Tensing Road
Cheltenham
Gloucestershire
GL53 9LX

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

16 Thompson Drive
Cheltenham
Gloucestershire
GL53 0PL

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

16 Treelands Close
Cheltenham
Gloucestershire
GL53 0DF

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

16 Vineries Close
Cheltenham
Gloucestershire
GL53 0NU

Comments: 14th October 2013
I wish to register my objection to the above-mentioned outline planning application on the following grounds

Such a development would produce an enormous number of additional vehicle movements on road which are already very congested, particularly at peak travel times and the plan shows no improvement to the existing main routes. The re-alignment of a couple of junctions, viz - Kidnappers Lane onto Shurdington and Farm Lane onto Church Road might improve visibility at these points but will in no way reduce traffic flow. Closing the eastern end of Kidnappers Lane may stop it being used as a 'rat-run' but will add the number of vehicles currently used by residents to those having to exit onto the A.46. The air pollution produced by these extra vehicle movements will significantly add to the already broken EU levels that occur. Any public transport which might be provided would again increase pollution. School vacancies are a serious concern with local Senior schools showing no plans to increase capacity. There is a serious risk of flooding from water running off Leckhampton Hill. Serious re-consideration of the JCS of Cheltenham, Gloucester and Tewkesbury Councils in respect of their transport plan must be undertaken before any consideration can be given to the planning proposal. The use of green belt and white land must be rejected at least until all brown field sites have been utilised. Such a plan, together with proposals for houses near Hatherley Way and Brizen, would further the Joining up of Cheltenham and Gloucester

163 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0AD

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

17 Allenfield Road
Cheltenham
Gloucestershire
GL53 0LX

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

17 Collum End Rise
Leckhampton
Cheltenham
Gloucestershire
GL53 0PA

Comments: 30th October 2013
I am writing to state my very strong objection to outline planning application 13/01605/OUT for the erection of 650 houses on land at Kidnappers Lane and the Smallholdings, Leckhampton.

Once again we are faced with this same proposal, to build on and ruin forever a very large slice of the unspoiled land of Leckhampton. It was unacceptable before and it is unacceptable now. The various reasons for objection all still apply. This appears to be Cheltenham under attack from developers, with no consideration of the residents, their needs or wishes. I consider that such construction would cause severe and permanent damage to the environment of this area. A lovely part of the south of the town would be destroyed forever. Valuable landscape (the AONB and Leckhampton Hill) would be damaged. It would spoil the outstanding views from and towards the Cotswold escarpment. The damage would be clearly visible from the high ground for miles around. It seems to me that building as proposed would be a significant step towards joining Cheltenham and Gloucester, so that a single urban area would result. The Green Belt is intended to prevent such coalescence. I consider that the additional traffic which such a scheme would generate would have a major adverse impact upon Leckhampton and the surrounding area. The effect on Cheltenham will be undesirable, with a larger population, more traffic, more congestion and more shops, to name but a few of the results to be expected.

Flooding in the area is already a difficulty which the development seems likely to exacerbate. I understand that previous reports of HM Planning Inspectors have recommended against developing this land. The council should, I think, have regard to these recommendations. Now that the council is in the middle of consideration of, and consultation about, the Joint Core Strategy for the area of Cheltenham, Tewkesbury and Gloucester, it seems to me that the Strategy should be finalised before the Planning Committee considers the application for this huge scheme. Fundamentally, the population estimates contained in the housing targets, which have been widely criticised, should be validated, or amended, before any further action is taken. Further, all aspects of planning, transport, environment should be verified in advance of consideration of this application.

Overall, in my opinion, it would be a grave mistake to proceed with the scheme.

17 Collum End Rise
Leckhampton
Cheltenham
Gloucestershire
GL53 0PA

Comments: 30th October 2013
I write to state my very strong objection to outline planning application 13/01605/OUT for the erection of 650 houses on land at Kidnappers Lane and the Smallholdings, Leckhampton.

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I consider that such construction would cause severe and permanent damage to the environment of this area. A lovely part of the south of the town would be destroyed forever. Valuable landscape (the AONB and Leckhampton Hill) would be damaged. It would spoil the outstanding views from and towards the Cotswold escarpment. The damage would be clearly visible from the high ground for miles around. It seems to me that building as proposed would be a significant step towards joining Cheltenham and Gloucester, so that a single urban area would result. The Green Belt is intended to prevent such coalescence.

I consider that the additional traffic which such a scheme would generate would have a major adverse impact upon Leckhampton and the surrounding area. The effect on Cheltenham will be undesirable, with a larger population, more traffic, more congestion and more shops, to name but a few of the results to be expected. Flooding in the area is already a difficulty which the development seems likely to exacerbate.

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Overall, in my opinion, it would be a grave mistake to proceed with the scheme.

17 Hall Road
Cheltenham
Gloucestershire
GL53 0HF

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

17 Liddington Close
Cheltenham
Gloucestershire
GL53 0AH

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

17 Liddington Close
Cheltenham
Gloucestershire
GL53 0AH

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

17 Peregrine Road
Cheltenham
Gloucestershire
GL53 0LN

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

17 The Lanes
Cheltenham
Gloucestershire
GL53 0PU

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

17 The Lanes
Cheltenham
Gloucestershire
GL53 0PU

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

17 Treelands Close
Cheltenham
Gloucestershire
GL53 0DF

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

17 Treelands Drive
Cheltenham
Gloucestershire
GL53 0DG

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

17 Vineries Close
Cheltenham
Gloucestershire
GL53 0NU

Comments: 16th October 2013
Octavia Hill, who founded the National Trust said that 'open spaces and places of beauty are essentials to everyone's way of life, whether they know it or not'. Without people like her, there would not be many beautiful places for recreation like Hampstead Heath.

We must fight against the ever expanding housing which threatens to devour our open spaces, so that we can preserve places of natural beauty for the general public.

I am strongly opposed to developing this, or any other land around Cheltenham.

17 Vineries Close
Cheltenham
Gloucestershire
GL53 0NU

Comments: 15th October 2013
This development would be contrary to promises made in the Lib Dems election manifesto, and so would be undemocratic, and possibly illegal. The damage to wildlife, air quality and drainage would be calamitous. The local infrastructure and amenities would be overwhelmed since they are already at breaking point. It would be a stupid, irreversible and immoral 'rape' of the land. But I expect it will go ahead....sigh

17 Vineries Close
Cheltenham
Gloucestershire
GL53 0NU

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

176 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0AE

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

179 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0AD

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

18 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

18 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

18 Eynon Close
Cheltenham
Gloucestershire
GL53 0QA

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

18 Moorend Grove
Cheltenham
Gloucestershire
GL53 0HA

Comments: 10th December 2013
1. Car ownership in & around Cheltenham is very high & it's probably two vehicles/household . Accordingly you don't have to be a mathematician to say that this proposed amount of housing will introduce at least an extra 1000 vehicles onto the country roads around the area. There are regular "confrontations" along Church & Hall Roads. The junctions of these roads with Leckhampton & Shurdington Roads are also "very busy" at the each end of business hours.
2. CBC is obviously having in finding local housing sites within the town boundary. Why don't they examining the possibility of resitting of our F.C.Football Club to the Racecourse Complex?

18 Oxford Way
Cheltenham
Gloucestershire
GL51 3HJ

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

18 Peregrine Road
Cheltenham
Gloucestershire
GL53 0LL

Comments: 17th October 2013
I am writing to express my objection in the planning application Kidnappers Lane 13/01605/OUT

Leckhampton does not have the infrastructure for this level of development, the Shurdington Road is already at capacity and will not take an approximate additional 1000 cars.

The Local Senior schools are already oversubscribed, so Children will have to go to schools further away, again adding to the volume of traffic.

Air pollution is also another concern, and with the proposed developments this will only make matters worse. There will also be the increased risk of flooding. A brownfield first policy must be adopted, if we can regenerate run-down urban sites, this will preserve the open countryside.

With this level of development you will change the look and feel of Leckhampton; this is NOT what the local people want. You must reconsider the application and get verification on the transport, environment and population estimates contained in the housing targets.

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

18 Southcourt Drive
Cheltenham
Gloucestershire
GL53 0BT

Comments: 1st November 2013
I object to the planning application 13/01605/OUT. I am concerned about many elements of the proposal, but mainly over the future schooling and the danger the proposed developments will leave children with out schools. this in turn with the amount of traffic on the roads and breakdown of the transport system

187 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0AD

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

19 Allenfield Road
Cheltenham
Gloucestershire
GL53 0LX

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

19 Blackthorn End
Leckhampton
Cheltenham
Gloucestershire
GL53 0QB

Comments: 6th December 2013
Letter attached: BATCH 9 (2nd - 6th December)

19 Giffard Way
Leckhampton
Cheltenham
Gloucestershire
GL53 0PW

Comments: 31st October 2013
I am writing to object to outline plan ref 13/01605/OUT. I am concerned about this application for several reasons: the environmental impact, the number of houses proposed, and the impact on already overcrowded roads. This application should not go before the Planning Committee until the Joint Core Strategy for Cheltenham, Gloucester and Tewkesbury has been finalised, and all aspects of population estimates in the housing targets have been verified. Whatever happened to fulfilling housing needs by building on brownfield sites first?

19 Gordon Road
Cheltenham
Gloucestershire
GL53 0ES

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

19 Gordon Road
Cheltenham
Gloucestershire
GL53 0ES

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

19 Gordon Road
Cheltenham
Gloucestershire
GL53 0ES

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

19 Sarah Siddons Walk
Cheltenham
Gloucestershire
GL50 2LW

Comments: 11th October 2013
I wish to register my support for the whole development.

19 Selworthy
Up Hatherley
Cheltenham
Gloucestershire
GL51 3YA

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

19 Treelands Close
Cheltenham
Gloucestershire
GL53 0DF

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

192 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0AE

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

193 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0AD

Comments: 21st October 2013
This is a wholly inappropriate location for such a massive development. The local roads could not cope with the influx of traffic (and be assured people will use their cars to get to supermarkets, schools and employment etc no matter how many over-optimistic statements are included about cycleways, additional bus services primary school and shops). Losing green fields to concrete and tarmac would have a devastating effect on the local environment both for wildlife and local residents who have enjoyed walking the footpaths across and alongside the fields for decades if not centuries. These houses are not even needed! The application is premature while the JCS is still at the start of its public consultation period.

199 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0AL

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

19A Thompson Drive
Cheltenham
Gloucestershire
GL53 0PJ

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

2 Arden Road
Cheltenham
Gloucestershire
GL53 0HQ

Comments: 6th December 2013
Letter attached: BATCH 9 (2nd - 6th December)

2 Azalea Drive
Up Hatherley
Cheltenham
Gloucestershire
GL51 3EA

Comments: 16th October 2013
Letter attached: BATCH 2 (14th - 18th October)

2 Blackthorn End
Leckhampton
Cheltenham
Gloucestershire
GL53 0QB

Comments: 6th November 2013
My prime objection to this application is that it is premature and must not be permitted until the JCS is finalised and the great uncertainties over housing need, jobs, traffic and transport, schooling and have been properly resolved.

2 Blackthorn End
Leckhampton
Cheltenham
Gloucestershire
GL53 0QB

Comments: 6th November 2013
My prime objection to this application is that it is premature and must not be permitted until the JCS is finalised and the great uncertainties over: housing need, jobs, traffic and transport, schooling and other infrastructure have been properly resolved.

2 Charnwood Close
Cheltenham
Gloucestershire
GL53 0HL

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

2 Chelmsford Avenue
Cheltenham
Gloucestershire
GL51 3DN

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

2 Ewlyn Terrace
Fairfield Road
Cheltenham
Gloucestershire
GL53 7PD

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

2 Halland Road
Cheltenham
Gloucestershire
GL53 0DJ

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

2 Halland Road
Cheltenham
Gloucestershire
GL53 0DJ

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

2 Hobby Close
Cheltenham
Gloucestershire
GL53 0LP

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

2 Jasmin Way
Up Hatherley
Cheltenham
Gloucestershire
GL51 3HZ

Comments: 14th October 2013
Letter attached: BATCH 2 (14th - 18th October)

2 John Moore Gardens
Cheltenham
Gloucestershire
GL50 2LY

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

2 Kenelm Gardens
Cheltenham
Gloucestershire
GL53 0JW

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

2 Kenelm Gardens
Cheltenham
Gloucestershire
GL53 0JW

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

2 Larchmere Grove
Up Hatherley
Cheltenham
Gloucestershire
GL51 3NS

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

2 Merlin Way
Cheltenham
Gloucestershire
GL53 0LT

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

2 Tensing Road
Cheltenham
Gloucestershire
GL53 9LX

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

2 The Spindles
Cheltenham
Gloucestershire
GL53 0QD

Comments: 22nd November 2013
Letter attached: BATCH 7 (18th - 22nd November)

2 The Spindles
Cheltenham
Gloucestershire
GL53 0QD

Comments: 22nd November 2013
Letter attached: BATCH 7 (18th - 22nd November)

2 Treelands Drive
Cheltenham
Gloucestershire
GL53 0DA

Comments: 13th December 2013
Letter attached: BATCH 10 (9th - 13th December)

2 Whitley Court
Leckhampton Road
Cheltenham
Gloucestershire
GL53 0BJ

Comments: 22nd November 2013
Letter attached: BATCH 7 (18th - 22nd November)

20 Collum End Rise
Leckhampton
Cheltenham
Gloucestershire
GL53 0PB

Comments: 16th October 2013
Letter attached: BATCH 2 (14th - 18th October)

20 Hall Road
Cheltenham
Gloucestershire
GL53 0HE

Comments: 23rd October 2013
Letter attached: BATCH 3 (21st - 25th October)

20 Hawkswood Road
Cheltenham
Gloucestershire
GL51 3DS

Comments: 4th October 2013
Letter attached: BATCH 3 (21st - 25th October)

Comments: 24th October 2013
Letter attached: BATCH 1 (3rd - 11th October)

Comments: 29th November 2013
Letter attached: BATCH 8 (25th - 29th November)

20 Merlin Way
Cheltenham
Gloucestershire
GL53 0LT

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

20 Moorend Crescent
Cheltenham
Gloucestershire
GL53 0EL

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

20 Southcourt Drive
Cheltenham
Gloucestershire
GL53 0BT

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

20 The Lanes
Cheltenham
Gloucestershire
GL53 0PU

Comments: 23rd October 2013
Letter attached: BATCH 3 (21st - 25th October)

20 Treelands Close
Cheltenham
Gloucestershire
GL53 0DF

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

20 Woodlands Road
Cheltenham
Gloucestershire
GL51 3RU

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

202 Old Bath Road
Cheltenham
Gloucestershire
GL53 9EQ

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

21 Arthur Bliss Gardens
Cheltenham
Gloucestershire
GL50 2LN

Comments: 24th October 2013
Letter attached: BATCH 3 (21st - 25th October)

21 Chelmsford Avenue
Cheltenham
Gloucestershire
GL51 3DL

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

21 Durham Close
Cheltenham
Gloucestershire
GL51 3DF

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

21 Hawkswood Road
Cheltenham
Gloucestershire
GL51 3DT

Comments: 14th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

21 Lichfield Drive
Cheltenham
Gloucestershire
GL51 3DQ

Comments: 22nd November 2013
Letter attached: BATCH 7 (18th - 22nd November)

21 Lincoln Avenue
Cheltenham
Gloucestershire
GL51 3DD

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

21 Merestones Close
Cheltenham
Gloucestershire
GL52 2ST

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

21 Moorend Road
Cheltenham
Gloucestershire
GL53 0ER

Comments: 25th November 2013
I wish to object to this planning application for 650 houses and other building between Kidnappers Lane, Church Lane and Shurdington Road in and adjacent to Leckhampton.

This development is not sustainable in terms of road transport. The A46 Shurdington Road and Church Lane are already highly congested in rush hour periods and exceed EC pollution guidelines in the winter. The increase in traffic generated by such a large development cannot be accommodated by the road infrastructure in this part of the town.

This development seeks to anticipate the Joint Core Strategy. Another developer has already described the road infrastructure as broken. The JCS transport plan and traffic modelling are essential pre-requisites to considering any more development in this area.

The area has had experience of flooding in the recent past and the drainage is already at the limit of its capacity.

The sewerage system in this part of town also has limited scope for increased flow.

The JCS seeks to minimise developmental impact on the Cotswolds AONB. This development threatens the amenity of the Cotswold Edge in the AONB and the Cotswolds Long Distance Footpath.

The basis of the JCS predictions of household growth are already under challenge from the Office of National Statistics and the Bristol Planning Inspectorate Local Plan Team. There is no sound basis for anticipating a requirement for this number of extra homes in the plan period to 2031 and any proposal for development at this stage cannot be justified before all aspects of the plan, likely housing and job growth, education provision, environment and sustainability assumptions have been verified and the plan adopted.

21 Paddocks Lane
Cheltenham
Gloucestershire
GL50 4NU

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

21 Pilford Avenue
Cheltenham
Gloucestershire
GL53 9EJ

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

21 St Davids Close
Cheltenham
Gloucestershire
GL51 3HL

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

21 St Davids Close
Cheltenham
Gloucestershire
GL51 3HL

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

21 Waterford Court
Moorend Park Road
Cheltenham
Gloucestershire
GL53 0LA

Comments: 8th November 2013
Letter attached: Batch 5 (4th - 8th November)

22 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 17th October 2013
I object to the proposed development based on

(1) Traffic Flow data used for the project assumes optimistic parameters, hence predictions are not sufficiently robust for decision making

(2) Traffic flow along Shurdington Road will increase to cause gridlock

(3) Route along Kidnappers Lane to be removed will lead to congestion elsewhere

(4) Traffic turning out of Salisbury Avenue will have to wait longer in peak periods

(5) Schooling has not been properly considered

(6) Loss of amenities / green space to local people

(7) Maintenance of sustainable drainage has not been considered - please ask how the permeable paving will be cleaned, this requires use of a mobile jetting unit to unblock the gaps between bricks. Local Authorities have been employing jetting companies to clear porous paving because the paving blocks up and becomes impermeable. If this happens then there will be more flooding in Winchester Way because the runoff rate will increase once again, thus leading to the old problems again

(8) Church Road junction into Farm Lane is already dangerous. Traffic calming by means of speed bumps along this long road is considered awkward. Emergency vehicles will use this route, so the highways department may end up putting speed humps up that people drive around which may lead to accidents

22 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 22nd October 2013
Letter attached: BATCH 3 (21st - 25th October)

22 Campion Park
Up Hatherley
Cheltenham
Gloucestershire
GL51 3WA

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

22 Century Court
Montpellier Grove
Cheltenham
Gloucestershire
GL50 2XR

Comments: 29th November 2013
Letter attached: BATCH 8 (25th - 29th November)

22 Hall Road
Cheltenham
Gloucestershire
GL53 0HE

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

22 The Lanes
Cheltenham
Gloucestershire
GL53 0PU

Comments: 22nd October 2013
Letter attached: BATCH 3 (21st - 25th October)

22 Treelands Close
Cheltenham
Gloucestershire
GL53 0DF

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

23 Amaranth Way
Up Hatherley
Cheltenham
Gloucestershire
GL51 3YU

Comments: 14th October 2013
Letter attached: BATCH 2 (14th - 18th October)

23 Arden Road
Cheltenham
Gloucestershire
GL53 0HG

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

23 Giffard Way
Leckhampton
Cheltenham
Gloucestershire
GL53 0PW

Comments: 13th December 2013
Letter attached: BATCH 10 (9th - 13th December)

23 Hawkswood Road
Cheltenham
Gloucestershire
GL51 3DT

Comments: 14th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

23 Highwood Avenue
Cheltenham
Gloucestershire
GL53 0JJ

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

23 Tamarisk Close
Up Hatherley
Cheltenham
Gloucestershire
GL51 3WL

Comments: 31st December 2013
Further to the public consultation a month ago at Leckhampton Primary School, I would like to make a couple of extra points. (1) The recent weather has completely waterlogged some of the fields which are intended for this development. Personally, I would steer well clear of buying a property on this land. (2) It has also been brought to my attention how difficult the Moorend Park Road / Leckhampton Road junction has already become due to parked vehicles making it single track just by the Hall Road junction. Additional traffic would cause terrible tail-backs here, especially if the Kidnapper's Lane is blocked to traffic going east-west from Hatherley through to Charlton Kings.

I had already expressed concern about the school situation and I would like to reiterate the fact that since St.James is already taking on an extra 15 children per year, that the Secondary School provision is not sufficient to absorb an even larger cohort that will present itself once the new estate is occupied. The losers will be existing residents that will no longer fall within the catchment area for Bournside e.g. St Marks, Leckhampton (East) and the Reddings.

It has also occurred to me that the new residents on the estate will not be obliged to choose the new primary school as their first choice. Many will opt for the (established) local school which has outstanding results (within walking distance). Children in east Leckhampton (Old Bath Road, Pilley and Charlton Lane) will lose out as the new estate is nearer to Leckhampton Primary than they are. We could end up with a terrible logistical nightmare for these families as they are forced to send their children to schools further afield. Nobody will want to buy homes in this area either!

Finally, the pollution situation as it stands is already unacceptable for families that have asthmatics. It has alarmed local residents that this is already very bad. Please don't make a bad situation even worse.

23 The Lanes
Cheltenham
Gloucestershire
GL53 0PU

Comments: 8th November 2013
Letter attached: WEEK Batch 5 (4th - 8th November)

24 Chelmsford Avenue
Cheltenham
Gloucestershire
GL51 3DN

Comments: 15th October 2013
I am writing in the strongest possible terms in objecting to the above planning application, it is ill conceived and premature. It is madness to allow overzealous developers and lobbying groups to ride rough shod on a process that will destroy the Leckhampton community, I have attended presentations by Curtain & Co regarding this application which on average produced a 97% objection rate, nevertheless they are allowed to pick away at the reducing green open spaces, including green belt, we have left to produce an unwanted urban sprawl. There has to be a line drawn somewhere, and we are certainly at that point now.

It is obvious that the known problems of traffic congestion, pollution, flooding & education have not been thought through. The A46 already has a major problem at peak times with traffic backing up to Shurdington and beyond, should this development go through the problem will stretch back to the Brockworth roundabout and beyond.

Education:
Although a primary school is planned where will these children go when they require secondary education? There are simply not enough places.

Flooding:
Again the A46 is always prone to flooding, will balancing ponds solve the problem with the extra thousands of tons of concrete to contend with? I doubt it.

The JCS are now quoting 33,000 homes required between now and 2031, but the census carried out by the Office of National Statistics in 2011 published a figure of 20,000 and backed up by Strategic Housing Market Assessment.

There was a report in the press recently that the JCS had considered plans to build a new town, this would surely be the most sensible route to take, but of course with all the utilities in place for developers to tap into it becomes an easy option, but at the same time decimating this AONB.

24 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PR

Comments: 23rd October 2013
Letter attached: BATCH 3 (21st - 25th October)

24 Giffard Way
Leckhampton
Cheltenham
Gloucestershire
GL53 0PP

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

24 Merlin Way
Cheltenham
Gloucestershire
GL53 0LT

Comments: 25th September 2013
With regard to potential flooding from watercourses, Section 14 Table 11 states that 'Buffer strips alongside Leck 1, Leck 2 and Leck 3 and localised minor ground raising alongside Leck 3 will maintain separation between development and the 1:100 year flood plains associated with these watercourses. As a result there is negligible fluvial flood risk to the development.

The effect of such ground raising will, in the case of Leck 3, be simply to increase the risk of flooding on the opposite bank of the watercourse - in an area which has been recognised in Figure 3 of the plan as being liable to flooding. In other words, whilst ground raising will provide protection for the development site, it will exacerbate the risk to existing properties on the opposite side of the watercourse.

For this reason, development should be excluded from the area adjacent to Leck 3.

24 Moorend Grove
Cheltenham
Gloucestershire
GL53 0HA

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

24 Pilford Road
Cheltenham
Gloucestershire
GL53 9AQ

Comments: 24th October 2013
Letter attached: BATCH 3 (21st - 25th October)

24 The Close
Cheltenham
Gloucestershire
GL53 0PG

Comments: 5th November 2013
I strongly object to the planning application for the area of Kidnappers Lane and small holdings. Yet again must we draw your attention to chronic traffic congestion on the A46 (Shurdington road) into town and the consequent rat runs crated by said congestion. Some busy mornings I can wait some 5 minutes just to pull out of my street. 24 The Close. I also consider other issues to be a relevant objections overcrowded schools lack of a good public transport link, a lack of other amenities, and yet more erosion of pleasant fields and countryside.

243A Old Bath Road
Cheltenham
Gloucestershire
GL53 9EF

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

25 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 6th December 2013
Letter attached: BATCH 9 (2nd - 6th December)

25 Century Court
Montpellier Grove
Cheltenham
Gloucestershire
GL50 2XR

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

25 Peregrine Road
Cheltenham
Gloucestershire
GL53 0LN

Comments: 15th October 2013
Letter attached: BATCH 2 (14th - 18th October)

25 Tamarisk Close
Up Hatherley
Cheltenham
Gloucestershire
GL51 3WL

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

25 Timperley Way
Up Hatherley
Cheltenham
Gloucestershire
GL51 3RH

Comments: 18th July 2014
Letter attached: BATCH 12

25 Warren Close
Cheltenham
Gloucestershire
GL51 3HW

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

25 Woodlands Road
Cheltenham
Gloucestershire
GL51 3RS

Comments: 23rd October 2013
Letter attached: BATCH 3 (21st - 25th October)

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

26 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PR

Comments: 11th December 2013
I wish to object to the proposed development of the following grounds:

I believe the JCS has over-estimated the number of new homes needed.

Neither the roads nor the local schools could deal with the extra traffic and children generated by so many new homes. I live on Church Road, Leckhampton and have given up trying to get the car out onto the road during the rush hour, it is way too stressful. Extra traffic would just exacerbate an already difficult situation. All the local schools are full to bursting, too.

Not only is the traffic on Church Road and Shurdington Road too busy already but the extra pollution would adversely affect the local area.

Some of the fields flood in the winter (and even in a wet summer) so building on them makes no sense.

I think about 98% of the local population are against such extensive building of houses in the very pretty area, could you not listen to us?

26 Greatfield Lane
Up Hatherley
Cheltenham
Gloucestershire
GL51 3QQ

Comments: 17th March 2014
Letter attached: BATCH 12

26 Hall Road
Cheltenham
Gloucestershire
GL53 0HE

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

26 Mead Road
Cheltenham
Gloucestershire
GL53 7DT

Comments: 6th December 2013
Letter attached: BATCH 9 (2nd - 6th December)

26 Merlin Way
Cheltenham
Gloucestershire
GL53 0LU

Comments: 27th December 2013
Letter attached: BATCH 11 (14th - 20th December)

26 Moorend Park Road
Cheltenham
Gloucestershire
GL53 0JY

Comments: 14th October 2013
I strongly object to the development for the following reasons:

1. Prematurity of application
2. Flood risk
3. Lack of capacity on roads to support increased traffic
4. Lack of secondary school provision for incoming/ existing children in the area.
5. As a parent and health professional I am gravely concerned about the loss of open space. Only last weekend my children were out blackberry picking, looking out for sheep, ducks and chickens in an area allocated for 'high density housing'.

Time and time again local residents are having to argue the same points to protect the land that is so precious and means so much to our community. The development is not wanted, not needed and will leave a permanent scar in a once beautiful part of Cheltenham.

26 Moorend Street
Cheltenham
Gloucestershire
GL53 0EH

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

26 Rothermere Close
Up Hatherley
Cheltenham
Gloucestershire
GL51 3UU

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

26A Winchester Way
Cheltenham
Gloucestershire
GL51 3HA

Comments: 8th November 2013
Letter attached: BATCH 5 (4th - 8th November)

27 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 24th October 2013
Letter attached: BATCH 3 (21st - 25th October)

27 Rosehip Court
Up Hatherley
Cheltenham
Gloucestershire
GL51 3WN

Comments: 14th October 2013
Letter attached: BATCH 2 (14th - 18th October)

27 The Greenings
Up Hatherley
Cheltenham
Gloucestershire
GL51 3UX

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

27 Treelands Close
Cheltenham
Gloucestershire
GL53 0DF

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

27 Warren Close
Cheltenham
Gloucestershire
GL51 3HW

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

28 Durham Close
Cheltenham
Gloucestershire
GL51 3DF

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

28 Merlin Way
Cheltenham
Gloucestershire
GL53 0LU

Comments: 14th October 2013
I have many objections to the proposed development. The application should not be considered before

1. The JCS report is finalised
2. In isolation from other development plans.

I am surprised that so little change has been made from the plan submitted for public consultation on 22nd Sept 2012, despite the objections made by a large majority of those who attended. My objections to the detail of the plans are,

1. Loss of amenity,
This is the last area of open land in a highly populated parish. Any development of this land should include much more in the way of Green corridors/Linear parks/Public open space for the benefit of the existing population, any new population and the abundant wildlife of the area.

2. Traffic,
The numerous pages in the application are not for the layman but if one dwelling in three has a vehicle emerging in the morning rush hour, an additional car will be joining the Shurdington Road congestion every 15 seconds The proposals do not deal with this problem adequately.

3. Flood Risk.
The flood risk assessment deals mainly with managing the development itself. Although they say on Page 28 "No increased risk to third parties alongside the development" on page 40, they propose to raise the level of a considerable area of the land alongside the watercourse, LECH 3, by a minimum of 0.5 metres. This, together with the plan to increase the capacity of the drainage ditches feeding into LECH 3 will increase the flood risk to Merlin Way in the event of an exceptional weather event. This is unacceptable.

I would urge all Councillors and Officers to reject these proposals and encourage a much lower density that is more in keeping with the image of Cheltenham as a green and pleasant town.

Comments: 3rd July 2014
Further to my e-mail of 14th October 2013 detailing some of my objections to the development proposal - I am pleased to see that the JCS Pre-submission document reinforces my arguments with the following statements:-

1, VISIONS AND OBJECTIVES
"Development that does not compromise the quality of life of present and future generations".
"A town within a park"

2, STRATEGIC OBJECTIVE 4
"Conserve natural environment"
"Improve green infrastructure"
"Provide movement corridors for people and wildlife"

3, GREEN INFRASTRUCTURE
"All development should make a positive contribution to the green infrastructure"

I would contend that the application does not deal adequately with any of the, above, requirements of the JCS strategy document.
I urge that all Council Officers and Councillors ,again, to reject the application and demand a more suitable plan for this area.

28 Moorend Park Road
Cheltenham
Gloucestershire
GL53 0JY

Comments: 23rd October 2013
Letter attached: BATCH 3 (21st - 25th October)

28 Moorend Park Road
Cheltenham
Gloucestershire
GL53 0JY

Comments: 23rd October 2013
Letter attached: BATCH 3 (21st - 25th October)

28 Treelands Drive
Cheltenham
Gloucestershire
GL53 0DE

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

284 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AP

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

287 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AJ

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

289 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AJ

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

28B Canterbury Walk
Cheltenham
Gloucestershire
GL51 3HG

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

292 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AP

Comments: 29th November 2013
Letter attached: BATCH 8 (25th - 29th November)

298 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AP

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

2A Moorend Road
Cheltenham
Gloucestershire
GL53 0EU

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

3 Azalea Drive
Up Hatherley
Cheltenham
Gloucestershire
GL51 3EA

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

3 Gardenia Grove
Up Hatherley
Cheltenham
Gloucestershire
GL51 3HR

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

3 Highwood Avenue
Cheltenham
Gloucestershire
GL53 0JJ

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

3 Kenelm Gardens
Cheltenham
Gloucestershire
GL53 0JW

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

3 Pilford Close
Cheltenham
Gloucestershire
GL53 9HA

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

3 Pilford Road
Cheltenham
Gloucestershire
GL53 9AG

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

3 Pilford Road
Cheltenham
Gloucestershire
GL53 9AG

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

3 Silverthorn Close
Cheltenham
Gloucestershire
GL53 0JF

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

3 Southfield Rise
Cheltenham
Gloucestershire
GL53 9LH

Comments: 8th November 2013
Letter attached: BATCH 5 (4th - 8th November)

3 The Spindles
Cheltenham
Gloucestershire
GL53 0QD

Comments: 2nd December 2013
Letter attached: BATCH 12

3 Treelands Close
Cheltenham
Gloucestershire
GL53 0DF

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

30 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

30 Campion Park
Up Hatherley
Cheltenham
Gloucestershire
GL51 3WA

Comments: 22nd November 2013
Letter attached: BATCH 7 (18th - 22nd November)

30 Hall Road
Cheltenham
Gloucestershire
GL53 0HE

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

30 Highwood Avenue
Cheltenham
Gloucestershire
GL53 0JJ

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

30 Hillary Road
Cheltenham
Gloucestershire
GL53 9LD

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

30 Moorend Grove
Cheltenham
Gloucestershire
GL53 0HA

Comments: 18th October 2013
1) Given the magnitude of this application, it would be preposterous and undemocratic for this to go the planning committee before the consultation on the Joint Core Strategy with its contentious new housing targets is completed and the JCS endorsed by the people it affects.

2) There are no cycle lanes, bus lanes or rail routes to serve a big development in the site proposed, and I have serious concerns about the impact of the increase in traffic onto Shurdington Road at peak times. It is also obvious that Farm Lane and Church Road in Leckhampton would become a significant rat-run to avoid queues on the A46. Farm Lane is a small country lane, unsuitable for any increase in traffic, especially larger vehicles that will serve the commercial and community enterprises envisaged in the application and which are equally likely to "rat-run".

Church Lane in Leckhampton is already at close to chaos at peak times, traffic flow being badly restricted by resident's parked vehicles. The children and parents from Leckhampton Primary School also spill out onto Church Lane and any increase in traffic along it would have serious safety implications. Any significant increase in usage by larger commercial vehicles would be particularly concerning.

3) The smallholdings and fields that would have to be sacrificed for both this application (and the equally large associated further development already flagged) signal the "countryside" and the edge of Cheltenham. This proposed development would simply signal urban "sprawl". Cheltenham needs to value and maintain its ambience, identity and scenic location or it will lose the very things that make it attractive in the first place.

30 Painswick Road
Cheltenham
Gloucestershire
GL50 2HA

Comments: 29th November 2013
Letter attached: BATCH 8 (25th - 29th November)

30 Salisbury Avenue
Cheltenham
Gloucestershire
GL51 3BS

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

302 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AP

Comments: 22nd October 2013
Letter attached: BATCH 3 (21st - 25th October)

31 Hillary Road
Cheltenham
Gloucestershire
GL53 9LB

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

31 St Michaels Road
Cheltenham
Gloucestershire
GL51 3RP

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

31 Waterford Court
Moorend Park Road
Cheltenham
Gloucestershire
GL53 0LA

Comments: 18th October 2013
Sir - have you discussed the increase in population as envisaged by the proposal to build 650 houses in Leckhampton with CHELTENHAM GENERAL HOSPITAL?

A surgery is all very well, but hospitalisation will also be required. We are talking at least 2 people per house - = another 1300 potential patients? And A & E here is already closed at nights. Perhaps Gloucester Royal should also be consulted

Both hospitals are already overstretched.

I would like confirmation that you have had full discussions with the Chief Executive

32 Lichfield Drive
Cheltenham
Gloucestershire
GL51 3DH

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

32 Moorend Park Road
Cheltenham
Gloucestershire
GL53 0JY

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

32 Moorend Road
Cheltenham
Gloucestershire
GL53 0HD

Comments: 22nd October 2013
Letter attached: BATCH 3 (21st - 25th October)

32 Shurdington Road
Cheltenham
Gloucestershire
GL53 0JD

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

325 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AJ

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

326 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AL

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

33 Arden Road
Cheltenham
Gloucestershire
GL53 0HG

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

33 Moorend Road
Cheltenham
Gloucestershire
GL53 0ER

Comments: 22nd November 2013
I wish to object to the planning application for 650 new homes in Leckhampton.

My objection is on 2 grounds;

1) I do not think that there is (nor planned) the appropriate infrastructure to support such a huge number of new homes

The local roads will be impacted to such a degree that traffic congestion will be horrendous. The A46 Shurdington Road is already heavilly conjested at peak times and this proposed development will make the situation impossible. Traffic using Church Road will also be greatly increased. This is a bottle neck at peak times and with a primary school close there will be the increased risk of road accidents.

There will also be insuffiecient school places to cope with the increased local population. I appreciate that a new primary school has been proposed - although this will not be built until later? A new primary school should be built right from the onset. My biggest concern however is about secondary school places. Leckhampton as a catchment area is currently caught between Balcarras and Bournside. With 650 new homes in the area this will put an unprecidented demand on these 2 local schools that they simply cannot meet. The building of a new secondary school would be essential.

The infrastructure of the local area must be considered. It is not just about the building of new homes - it the impact of these additional families - the cars they drive, schools they will want to

attend etc - that Cheltenham Borough Council have a responsibility to consider and make appriate plans for.

2) The number of homes is too high!

I want to make it clear that I am not opposed to development. Quite the opposite. I fully appreciate the wider government policy and that of the JCT to build additional homes in the area. Leckhampton would make a fantastic home to new families and the community would benefit. My issue is with the volume of homes proposed.

Why can this not be reduced to something more sensible such as 300 homes? At least some of the greenbelt area around Leckhampton should be protected. This is precious space that once built on can never be replaced. I would suggest that any land 'saved' could be used for a new Leckhampton community park. This would bring tremendous value to the area and provide a place of recreation to both exisiting residents and new families moving to the area. This would be far more sensible option and cause much less overall impact to the local infrastructure (as outlined in Point 1)

I implore you to consider these views and those of many residents of Leckhampton that do not want their village and surrounding area ruined.

I will be attending the public meeting on Weds 27th November at Leckhampton Primary School where I hope to raise these views again and question some of the decsion making regarding this planning application.

33 Pilley Crescent
Cheltenham
Gloucestershire
GL53 9ES

Comments: 25th October 2013
I write to state my strong objection to planning application 13/01605/OUT for the erection of 650 houses on land around Kidnappers Lane in Leckhampton.

Yet again we are faced with what is in essence the same proposal as before, to build on and spoil forever a very large slice of Leckhampton's green fields. It was unacceptable before and it is unacceptable now. The various reasons for objection all still apply.

I strongly object to these proposals to build houses in Leckhampton and Shurdington. I consider that such construction would cause severe and permanent damage to the environment of these places. Valuable landscape (the AONB and Leckhampton Hill) would be damaged. It would adversely affect the outstanding views, from, and towards, the Cotswold escarpment

I do not think that landscaping can possibly obscure the damage, which would be clearly visible from the high ground for miles around. It seems to me that building as proposed would be a significant step towards joining Cheltenham and Gloucester, so that a single urban area would result. The site is in the Green Belt, which is intended to prevent coalescence between Cheltenham and Gloucester.

I consider that the additional traffic which such a scheme would generate would have a major adverse impact upon Leckhampton and the surrounding area. As a professional that uses church lane everyday to commute to work I know first hand how busy it is already, the addition of extra houses/cars would cause major traffic issues and would have an adverse effect on the air quality and local environment.

The effect on Cheltenham will be incredibly undesirable, with a larger population, more traffic, more congestion and more shops, and the negatives effects on the natural environment and local wildlife will be horrific. Flooding in the area is already a difficulty which the development seems likely to exacerbate. If more fields are filled with building foundations where is excess water supposed to drain away?

We live in transient times, and I accept that change must happen but I strongly believe this should only be the case if the change is for the better these proposals seem purely motivated by money and not in the interests of the current or future population. We moved to this area for the good balance of shops, housing and above all green areas in which we walk our dog and our child plays. I feel that often with new developments the residents who already exist are not considered highly enough and what the impact would be on their lives.

I would question how you have come to the ridiculous figure of 33,000 houses to be built in the Cheltenham and it's local areas, this seems to be a gross over estimation of requirement unless you are actually intent on encouraging a vast population inhabiting the region from other areas of the country and from abroad? With unemployment levels as high as they are the amount of young adults being able to afford/wanting to afford their own housing is lower than in previous years, with many choosing to stay at home longer to save money, so who will fill these houses?

Having a young family myself I want this area to stay green, full of nature and beautiful open spaces. I feel that extra housing would drive people out of this area heading for greener lands. We have chosen to move here , a safe haven from pollution and traffic, with an abundance of wildlife on our doorstep. Yet you actively seek to deny future generations this healthy lifestyle, in a time when childhood obesity is ever encroaching on our nation, this is totally ridiculous. as a parent, I know we are living in times where technology and ICT is highly prominent in children's lives I know the importance of encouraging children to enjoy the outdoors and appreciate nature. This will become harder and harder to do if surrounding green belted areas are built on for monetary profits. The cost on the NHS to treat obesity is phenomenal and I believe that taking away places and opportunities for children to be active will only add to this on-going, growing problem.

It is about time that politicians started to listen to the people of this nation before they abandon it completely. It would be a grave mistake to proceed with the scheme.

33 Pilley Crescent
Cheltenham
Gloucestershire
GL53 9ES

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We live in transient times, and I accept that change must happen but I strongly believe this should only be the case if the change is for the better these proposals seem purely motivated by money and not in the interests of the current or future population. We moved to this area for the good balance of shops, housing and above all green areas in which we walk our dog and our child plays. I feel that often with new developments the residents who already exist are not considered highly enough and what the impact would be on their lives.

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Having a young family myself I want this area to stay green, full of nature and beautiful open spaces. I feel that extra housing would drive people out of this area heading for greener lands. We have chosen to move here , a safe haven from pollution and traffic, with an abundance of wildlife on our doorstep. Yet you actively seek to deny future generations this healthy lifestyle, in a time when childhood obesity is ever encroaching on our nation, this is totally ridiculous. As a primary school teacher living in times where technology and ICT is highly prominent in children's lives I know the importance of encouraging children to enjoy the outdoors and appreciate nature. This will become harder and harder to do if surrounding green belted areas are built on for monetary profits. The cost on the NHS to treat obesity is phenomenal and I believe that taking away places and opportunities for children to be active will only add to this on-going, growing problem.

It is about time that politicians started to listen to the people of this nation before they abandon it completely. It would be a grave mistake to proceed with the scheme.

33 Southcourt Drive
Cheltenham
Gloucestershire
GL53 0BU

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

33 St Michaels Road
Cheltenham
Gloucestershire
GL51 3RP

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

331 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AJ

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

34 Campion Park
Up Hatherley
Cheltenham
Gloucestershire
GL51 3WA

Comments: 16th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

34 Merlin Way
Cheltenham
Gloucestershire
GL53 0LU

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

343 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AH

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

344 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AF

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

346 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AF

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

346 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AF

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

347 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AH

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

34A Pilley Lane
Cheltenham
Gloucestershire
GL53 9ER

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Comments: 13th December 2013
Letter attached: BATCH 10 (9th - 13th December)

35 The Park
Cheltenham
Gloucestershire
GL50 2SD

Comments: 14th October 2013
Letter attached: BATCH 2 (14th - 18th October)

35 Wells Close
Hatherley
Cheltenham
Gloucestershire
GL51 3BX

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

35 Westbury Road
Cheltenham
Gloucestershire
GL53 9EN

Comments: 15th October 2013
Letter attached: BATCH 2 (14th - 18th October)

356 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AF

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

357 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AH

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

36 Moorend Street
Cheltenham
Gloucestershire
GL53 0EH

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

37 Charlton Lane
Cheltenham
Gloucestershire
GL53 9DY

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

37 Charlton Lane
Cheltenham
Gloucestershire
GL53 9DY

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

372 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AD

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

377 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AH

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

38 Collum End Rise
Leckhampton
Cheltenham
Gloucestershire
GL53 0PB

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

38 Moorend Road
Cheltenham
Gloucestershire
GL53 0HD

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

38 Moorend Road
Cheltenham
Gloucestershire
GL53 0HD

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

38 Moorend Street
Cheltenham
Gloucestershire
GL53 0EH

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

38 Norwich Drive
Cheltenham
Gloucestershire
GL51 3HE

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

4 Blackthorn End
Leckhampton
Cheltenham
Gloucestershire
GL53 0QB

Comments: 30th October 2013
We have been living here for past 4 years. We have moved to this house aiming to get a catchment to nearest primary school for my 4 year son. Unfortunately the school was oversubscribed and we did not get a place. We have no other option apart choosing the private school far away 2 miles(St Edwards).With current population and peak hr traffic we not able reach school ontime through both shrudington and Leckhampton roads.

As schools are oversubscribed with current population we are worried for secondary school places.

We also worried for my second child to get into primary school. We cannot afford both private option.

My childrens and we enjoy the local Green fields and walks. They certainly enjoy nearest pig farm. My son is very good in school nature knowledge as he spending time in green fields, plants and animals.

Please strongly reject this development .This will increase local traffic and no places to local schools and loss of green fields.

4 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 24th October 2013
Letter attached: BATCH 3 (21st - 25th October)

4 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 22nd October 2013
Letter attached: BATCH 3 (21st - 25th October)

4 Charnwood Road
Cheltenham
Gloucestershire
GL53 0HJ

Comments: 15th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

4 Chestnut Place
Cheltenham
Gloucestershire
GL53 0QE

Comments: 21st October 2013
We wish to OBJECT to the above application. The reasons for our objection are as follows:-

The development will cause traffic chaos. There are already daily long queues of traffic at peak times along Shurdington Road adjacent to where the development is set to take place. The traffic layout proposed here closes access from the new development to Church Road via Kidnappers Lane, meaning that ALL traffic from existing properties plus the new houses (estimated to generate an additional 1000 vehicles) will join Shurdington Road. Additionally the siting of a primary school, surgery and other non-residential amenities there will add to traffic volumes as inevitably they will be used by people other than in their immediate vicinity. Essentially the JCS transport plan and traffic modelling for Leckhampton must come forward before this application goes to planning committee. Air Pollution levels already break EU levels in the winter months on Shurdington Road A46 and Church Road in the winter months. The extra traffic referred to above will add to this problem. This goes against the idea of making Cheltenham an Air Quality Management Area to tackle the problem of air pollution.

Aside from the dubious wisdom of siting an new primary school within the development, there are insufficient senior school places in the area , EVEN NOW, and neither Balcarras or Bournside schools have plans to expand. Residents of the new homes could face lengthy journeys to school. The development will cause irrepairable harm to the local landscape (close to the AONB) and to wildlife. On a general point, we strongly believe that developers should not be able to get

away with building on green field sites such as this, at least until alternative 'brownfield sites' have been exhausted.

This brings us back to the JCS, which is still to be ratified. Surely at the very least this application is premature and should not go before the planning committee until the JCS is finalised, and all aspects of planning, transport, environment and the population estimates on which the housing targets are based have been verified.

4 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PR

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

4 Fairfield Road
Cheltenham
Gloucestershire
GL53 7PE

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

4 Giffard Way
Leckhampton
Cheltenham
Gloucestershire
GL53 0PP

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

4 Highwood Avenue
Cheltenham
Gloucestershire
GL53 0JJ

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

4 Justicia Way
Up Hatherley
Cheltenham
Gloucestershire
GL51 3YH

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

4 Kestrel Close
Cheltenham
Gloucestershire
GL53 0LQ

Comments: 21st October 2013
Further to the proposed planning applications as a local resident of Leckhampton I would like to raise my objection & highlight my concerns;

- Traffic; Shurdington Road is already close to grid lock on mornings & evening, let along the increased pollution risks
- Flooding; having lived in Cheltenham for some time now & seen the effects of flooding, we need to keep our green belt
- We live in Leckhampton to enable us to take our children into the countryside through local walks & I would like to see the agricultural land remain
- Lack of provision for secondary school places

I believe we will be disproportionately affected by these plans & therefore I hope the proposals are rescinded.

4 Leckhampton Farm Court
Leckhampton
Cheltenham
Gloucestershire
GL51 3GS

Comments: 16th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

4 Nourse Close
Cheltenham
Gloucestershire
GL53 0NQ

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

4 Nourse Close
Cheltenham
Gloucestershire
GL53 0NQ

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

4 Pickering Close
Cheltenham
Gloucestershire
GL53 0LE

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

4 Vineries Close
Cheltenham
Gloucestershire
GL53 0NU

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

Comments: 14th November 2013
I very strongly object to any further development in Leckhampton as I have outlined on many previous occasions.

I do agree with all of the rehearsed comments which have been made over recent years against such developments.

Please adhere to the wishes of the local people who live here; it is their right to make such major decisions, and not bureaucrats and developers from afar.

40 Century Court
Montpellier Grove
Cheltenham
Gloucestershire
GL50 2XR

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

40 Merlin Way
Cheltenham
Gloucestershire
GL53 0LU

Comments: 13th December 2013
Letter attached: BATCH 10 (9th - 13th December)

40 Moorend Crescent
Cheltenham
Gloucestershire
GL53 0EL

Comments: 22nd October 2013
Letter attached: BATCH 3 (21st - 25th October)

41 Campion Park
Up Hatherley
Cheltenham
Gloucestershire
GL51 3WA

Comments: 4th November 2013
I wish to object to the proposed development on the following grounds:

a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing needs, traffic and transport, schooling and other infrastructure have been properly resolved.

b) The traffic congestion created by this development together with other proposed developments south of Cheltenham would create huge traffic queues in peak travel periods. The planning application offers no solutions to the grave traffic problems.

c) The suggestions made for preventing traffic overload and gridlock in Church Road are unlikely to be successful. Church Road already suffers from severe congestion at peak times. The suggestions made are likely to encourage accidents and may well increase traffic flow elsewhere, such as in Moorend Park Road.

d) I am deeply concerned by the health and accident risks from the traffic queues an pollution that would result from the proposed development.

e) Leckhampton Firelds is an area that my family and I greatly value for recreation. It should be preserved as a Local Green Space for its amenity value, footpaths, landscape, wildlife history and impact on views from Leckhampton Hill, as suggested in the LWWH and Shurdington Concept Plan.

42 Fernleigh Crescent
Up Hatherley
Cheltenham
Gloucestershire
GL51 3QL

Comments: 25th September 2013
I write as Cabinet member (Sustainability) for CBC. It is my view that the area shown as Community Orchard on the map would be more appropriately redesignated as further allotments (as the adjacent area already is). It is difficult to identify known demand for a Community Orchard, or who will tend it. On the other hand there is substantial proven demand for allotments, as council officers can demonstrate.

Comments: 13th May 2014
Ref Doctors' Surgery - it might provide a much better and more cost-effective service if the Doctors' Surgery facility was provided by upgrading and enhancing the existing (Portland Practice) facility in Hulbert Crescent , i.e. next to Morrisons. With 650 houses on the new site, the facility would probably be quite limited, whereas a combined facility at Portland would benefit all.

42 Moorend Park Road
Cheltenham
Gloucestershire
GL53 0JY

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

42 Pilley Lane
Cheltenham
Gloucestershire
GL53 9ER

Comments: 14th October 2013
I am writing in my capacity as a Leckhampton resident, to express my serious concerns about the above-referenced outline planning application. I have many concerns about the proposed development, but have highlighted below the three issues that concern me most:

Traffic congestion. This area of Cheltenham is already heavily congested, especially at peak periods, and I do not feel that this issue has been adequately addressed in the proposed plans.

Secondary school places. There is already considerable pressure on secondary schools in the area, and the addition of another primary school will only exacerbate the situation by creating additional primary places with no assurances of a secondary school place thereafter. As a parent of three, I am very concerned that the proposal does nothing to address this problem at all, and in fact seems only likely to make it worse.

Local area character. I find the proposal to build on such a beautiful area, which is a much-loved amenity for local people, frankly appalling. I fear that the character of Leckhampton (which our family moved from Hatherley to Leckhampton to enjoy), will be spoilt by the loss of this area. Aside from the impact on the ground, the view from Devil's Chimney and the Cotswold Way in this direction will become nothing more interesting than more urban sprawl, instead of the green and pleasant view it currently presents.

I would be grateful if you would take my concerns into consideration as the application process moves forward.

42 Waterford Court
Moorend Park Road
Cheltenham
Gloucestershire
GL53 0LA

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

Comments: 13th December 2013
Letter attached: BATCH 10 (9th - 13th December)

43 Charlton Lane
Cheltenham
Gloucestershire
GL53 9DY

Comments: 21st November 2013
I am writing to object to the proposed development of land off Kindnappers Lane, Cheltenham. As a Leckhampton resident I am very concerned about the impact of;

1) the increased vehicle traffic in the area if the development goes ahead. There is already significant traffic and pollution in the area. Living on Charlton Lane we have noticed a huge increase since we moved into our property 3 years ago, let alone building another 1075 homes.

2) Disruption during the building of these homes - we are already experiencing a large volume of large vehicles, dirt and noise pollution from a much smaller development on Charlton Lane which has been in progress for quite some time now.

3) As a new parent I am also concerned about the school places in primary and secondary schools.

4) Impact to the environment from building on a green field site. Leckhampton is a beautiful area with lots of fields, I would not want to reduce the fields in the area.

43 Painswick Road
Cheltenham
Gloucestershire
GL50 2EZ

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

44 Moorend Park Road
Cheltenham
Gloucestershire
GL53 0JY

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

44 Westbury Road
Cheltenham
Gloucestershire
GL53 9EW

Comments: 24th October 2013
Letter attached: BATCH 3 (21st - 25th October)

45 Princes Road
Cheltenham
Gloucestershire
GL50 2TX

Comments: 28th October 2013
I object to this planning application for 650 houses in Leckhampton for the following reasons:

1. The Joint Core Strategy (JCS) has yet to be completed. If this is judged to be an insufficient reason, on the basis that an Inspector at appeal might judge that the absence of a plan is not sufficient to stop a 'legitimate' application, then it should still be rejected on the basis that it is not as integrated or as comprehensive as the plan within the JCS.

2. It is imperative that the JCS process is completed before this application is properly considered, as it should provide Cheltenham with a sound strategy for solving its perceived housing shortage. As part of its deliberations, it should consider the Elms Park site as a preferred location to the Leckhampton site, on the basis of sustainability. Traffic pressures at Leckhampton are more severe than NW Cheltenham. The Elms Park site can also take much more than the 4,829 houses proposed in the JCS (the AMEC Site Capacity Assessment suggests a potential of up to 15,720). So it is essential that the JCS completes its detailed traffic studies so that this comparison of sites can be evaluated.

3. In anticipation of objections to any expansion of the Elms Park site, on the basis that the build rate could not meet the perceived need, I would suggest that the JCS population growth assumptions have significant uncertainties associated with their rate of growth, even if the totals themselves prove to be correct. So the speed of building out Elms Park should not be seen as a limitation but more of a 'blessing in disguise', as a controlled building rate reduces the risk of over expansion and an over capacity of housing.

4. Leckhampton should be protected as a Local Green Space, as proposed by the local parish council, LEGLAG and Mr Martin Horwood, MP for Cheltenham.

5. If the JCS process refuses to acknowledge the significant objections from the local community, and proceeds with developing Leckhampton, then it should introduce a local Park and Ride facility as part of its Master Plan. Additionally, it should increase the targets in the developer's residential and non-residential Travel Plans for more walking, cycling, public transport and less car journeys. These targets should be supported by significantly increasing the size of the Security Bond in the contract.

45 St Michaels Road
Cheltenham
Gloucestershire
GL51 3RP

Comments: 22nd November 2013
Letter attached: BATCH 7 (18th - 22nd November)

45 Winchester Way
Cheltenham
Gloucestershire
GL51 3EZ

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

46 Everest Road
Cheltenham
Gloucestershire
GL53 9LG

Comments: 18th November 2013
I am writing to object to the proposed development 13/01605/OUT for the following reasons:

a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

d) I am personally deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

e) My family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, wildlife, history and impact on views from Leckhampton Hill.

In summary, there is no justification for going ahead at this point in time with such a large-scale irreversible experiment in increasing the population of this area.

46 Merlin Way
Cheltenham
Gloucestershire
GL53 0LU

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

47 Moorend Crescent
Cheltenham
Gloucestershire
GL53 0EJ

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

47 Salisbury Avenue
Cheltenham
Gloucestershire
GL51 3BT

Comments: 11th November 2013
Please accept this email as a formal objection to the above mentioned planning application (13/01605/OUT). This objection comes from (*name withheld)* of 47 Salisbury Avenue, Warden Hill, Cheltenham, Gloucestershire, GL51 3BT and my objections to the planning application are as follows:

Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been resolved.

The traffic congestion created by this development together with other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as Moorend Park Road.

Are the council aware of the traffic problems we are already experiencing on the Shurdington Road during rush hour? It is not uncommon to see huge tailbacks up and down this road both in the mornings and in the evenings and the provision of additional homes will only add to this problem making an untenable situation even worse. The amount of traffic that will be created will either cause complete gridlock of this road or, if diverted, will create an increased risk to our families on roads not designed for this level of congestion.

My family and I are deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

My family and I greatly value the Leckhampton fields for recreation. We strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill. Our family have lived in Warden Hill for over fifty years and the attraction of the area originally was the open space that could be enjoyed by our family. We have all benefitted from the local footpaths, landscape and history that the Leckhampton fields provide and do still to this day. We believe that our house prices in Warden Hill and Leckhampton reflect the outdoor space available to us and our property prices would be gravely affected should the development be given permission to proceed.

Warden Hill and Hatherley have seen major developments over the last thirty years. During my time here I can remember the development on the edge of the Weavers Field and then the huge development from Farmfield Road edging back creating countless houses, a shopping estate, doctors surgery etc. We have surely seen our fair share of development and ask that our strong

feelings towards the Leckhampton fields for recreation be taken as seriously as any other point made. We cannot begin to explain the value we put on the green space that is under threat and would class it as a grave loss for future generations not to be able to enjoy the wildlife, history and landscape as we have been able to.

In accordance with the NPPF, the JCS must objectively estimate the housing need for Cheltenham and not exaggerate it. Where there is uncertainty the JCS must use the lower figure and keep land in reserve to respond flexibly if the housing need should turn out to be larger. The JCS must not risk allowing building on the green belt and the Leckhampton fields and then find out too late that this building was not necessary to meet the actual housing need.

In accordance with the NPPF, the JCS must promote sustainable transport. The housing developments currently proposed in south Cheltenham would have a devastating impact on the traffic and completely break the transport system. This is utterly unacceptable.

My husband and I recently married and plan to have children in the future however with the increased pressure on the local schooling we are deeply concerned over the danger the proposed developments which will leave our children without local schools. We understand that the new development includes the provision of a new primary school but this will not be built until a later stage leaving no primary provision for three hundred or so homes. The secondary schools are also already oversubscribed - the plans supplied give no answer to these major problems.

Living in Warden Hill we are extremely concerned regarding flooding. The floods of 2007 showed existing major flaws in the flood prevention plans which have since been rectified however with the development of further properties we can only worry about flooding in the future once the plans are found not to work and our homes at the bottom of Warden Hill are under water. We are advised that flood prevention has been taken into account with the plans for this development however it must be strongly noted that these plans cannot be guaranteed. The developers are suggesting that flood prevention has been taken into account however as long term residents of the Warden Hill community (our family has lived in the area for nearly forty years) we are deeply concerned for our properties. Does the requirement for developers profits outweigh the objections of the existing residents of the area?

In summary, we cannot stress enough how catastrophic we would see the granting of the proposed development on the Leckhampton fields. We are very worried about the level of increased traffic it would create both for our neighbourhood but also for our families. We have enjoyed a relatively quiet and accident free environment and believe that the granting of this application would not only de-value our property as the increased properties would devour the greenery in which our community has been built around but the increased risk to our families cannot have a price placed on it.

We have not had an assured guarantee that flooding in Warden Hill would not be increased due to this development and if 2007 is remembered then the results of this were costly enough. We DO NOT want to re-live this situation or have any question marks hanging over us as to when this may happen again. The risk of flooding cannot be guaranteed and we must therefore stress our strong objection to the plans.

The area has already been developed over the last thirty years and we do not see the requirement to take away our green space for the unnecessary building of these extra houses.

We believe that as long standing residents of Warden Hill the authorities should take note of our objections and not be pushed into a corner by the developers. Are you aware that at a recent survey conducted by LWWH that over 94% of people were opposed or strongly opposed to the proposed development. Developers cannot force this housing on us and we urge the council and the authorities to take our pleas seriously.

47 Salisbury Avenue
Cheltenham
Gloucestershire
GL51 3BT

Comments: 11th November 2013
Please accept this email as a formal objection to the above mentioned planning application (13/01605/OUT). This objection comes from (*name withheld*) of 47 Salisbury Avenue, Warden Hill, Cheltenham, Gloucestershire, GL51 3BT and my objections to the planning application are as follows:

Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been resolved.

The traffic congestion created by this development together with other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as Moorend Park Road.

Are the council aware of the traffic problems we are already experiencing on the Shurdington Road during rush hour? It is not uncommon to see huge tailbacks up and down this road both in the mornings and in the evenings and the provision of additional homes will only add to this problem making an untenable situation even worse. The amount of traffic that will be created will either cause complete gridlock of this road or, if diverted, will create an increased risk to our families on roads not designed for this level of congestion.

My family and I are deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

My family and I greatly value the Leckhampton fields for recreation. We strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill. Our family have lived in Warden Hill for over fifty years and the attraction of the area originally was the open space that could be enjoyed by our family. We have all benefitted from the local footpaths, landscape and history that the Leckhampton fields provide and do still to this day. We believe that our house prices in Warden Hill and Leckhampton reflect the outdoor space available to us and our property prices would be gravely affected should the development be given permission to proceed.

Warden Hill and Hatherley have seen major developments over the last thirty years. During my time here I can remember the development on the edge of the Weavers Field and then the huge development from Farmfield Road edging back creating countless houses, a shopping estate, doctors surgery etc. We have surely seen our fair share of development and ask that our strong feelings towards the Leckhampton fields for recreation be taken as seriously as any other point made. We cannot begin to explain the value we put on the green space that is under threat and would class it as a grave loss for future generations not to be able to enjoy the wildlife, history and landscape as we have been able to.

In accordance with the NPPF, the JCS must objectively estimate the housing need for Cheltenham and not exaggerate it. Where there is uncertainty the JCS must use the lower figure and keep land in reserve to respond flexibly if the housing need should turn out to be larger. The

JCS must not risk allowing building on the green belt and the Leckhampton fields and then find out too late that this building was not necessary to meet the actual housing need.

In accordance with the NPPF, the JCS must promote sustainable transport. The housing developments currently proposed in south Cheltenham would have a devastating impact on the traffic and completely break the transport system. This is utterly unacceptable.

My daughter and son in law recently married and plan to have children in the future however with the increased pressure on the local schooling we are deeply concerned over the danger the proposed developments which will leave our children without local schools. We understand that the new development includes the provision of a new primary school but this will not be built until a later stage leaving no primary provision for three hundred or so homes. The secondary schools are also already oversubscribed - the plans supplied give no answer to these major problems.

Living in Warden Hill we are extremely concerned regarding flooding. The floods of 2007 showed existing major flaws in the flood prevention plans which have since been rectified however with the development of further properties we can only worry about flooding in the future once the plans are found not to work and our homes at the bottom of Warden Hill are under water. We are advised that flood prevention has been taken into account with the plans for this development however it must be strongly noted that these plans cannot be guaranteed. The developers are suggesting that flood prevention has been taken into account however as long term residents of the Warden Hill community (our family has lived in the area for nearly fifty years) we are deeply concerned for our properties. Does the requirement for developers profits outweigh the objections of the existing residents of the area?

In summary, we cannot stress enough how catastrophic we would see the granting of the proposed development on the Leckhampton fields. We are very worried about the level of increased traffic it would create both for our neighbourhood but also for our families. We have enjoyed a relatively quiet and accident free environment and believe that the granting of this application would not only de-value our property as the increased properties would devour the greenery in which our community has been built around but the increased risk to our families cannot have a price placed on it.

We have not had an assured guarantee that flooding in Warden Hill would not be increased due to this development and if 2007 is remembered then the results of this were costly enough. We DO NOT want to re-live this situation or have any question marks hanging over us as to when this may happen again. The risk of flooding cannot be guaranteed and we must therefore stress our strong objection to the plans.

The area has already been developed over the last thirty years and we do not see the requirement to take away our green space for the unnecessary building of these extra houses.

We believe that as long standing residents of Warden Hill the authorities should take note of our objections and not be pushed into a corner by the developers. Are you aware that at a recent survey conducted by LWWH that over 94% of people were opposed or strongly opposed to the proposed development. Developers cannot force this housing on us and we urge the council and the authorities to take our pleas seriously.

48 Collum End Rise
Leckhampton
Cheltenham
Gloucestershire
GL53 0PB

Comments: 14th October 2013
Letter attached: BATCH 2 (14th - 18th October)

48 Lichfield Drive
Cheltenham
Gloucestershire
GL51 3DR

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

49 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PF

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

49 Collum End Rise
Leckhampton
Cheltenham
Gloucestershire
GL53 0PA

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

49 Salisbury Avenue
Cheltenham
Gloucestershire
GL51 3BT

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

5 Arden Road
Cheltenham
Gloucestershire
GL53 0HG

Comments: 18th October 2013
I wish to comment on the above ref, an application for 650 dwellings between Kidnapper's Lane and Shurdington Road, Leckhampton.
I object to this application on the following grounds:

Traffic. This development would generate unacceptable amounts of traffic onto Shurdington Road, which is already overloaded at peak times. Local roads cannot absorb this extra load. I believe that Shurdington Road already fails to meet EU standards for air quality, which would only get worse. As for Bath Road, the logical route into Cheltenham centre, this would become completely blocked.

Schools: insufficient spaces, especially in secondary schools.
The numbers of houses planned would swamp our Leckhampton community, destroying its village atmosphere and turning it into a dormitory area.

The development would ruin the quality of the local landscape, spoiling views both to and from Leckhampton hill.

This application is only a forerunner for the thousands of houses which developers wish to build in our area. I believe it to be a cynical attempt by developers to "get in under the wire" while the current changes to the planning system are being bedded in. As such, it should not be allowed, until a more comprehensive strategy has emerged.

5 Blackthorn End
Leckhampton
Cheltenham
Gloucestershire
GL53 0QB

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

5 Blackthorn End
Leckhampton
Cheltenham
Gloucestershire
GL53 0QB

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

5 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

5 David French Court
Up Hatherley
Cheltenham
Gloucestershire
GL51 3BQ

Comments: 8th November 2013
Letter attached: Batch 5 (4th - 8th November)

5 Halland Road
Cheltenham
Gloucestershire
GL53 0DJ

Comments: 8th November 2013
Letter attached: BATCH 5 (4th - 8th November)

5 Hampton Close
Leckhampton
Cheltenham
Gloucestershire
GL51 3DZ

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

5 Highwood Avenue
Cheltenham
Gloucestershire
GL53 0JJ

Comments: 14th October 2013
Letter attached: BATCH 2 (14th - 18th October)

5 Merlin Close
Cheltenham
Gloucestershire
GL53 0NF

Comments: 6th December 2013
I refer to the Planning Application as mentioned above, and wish to object in the strongest possible terms to this development.

I am a resident of Leckhampton, and whilst not being directly affected by it, I am of the opinion that this development will be disastrous not just for Leckhampton, but for Cheltenham as a whole. I list below:

1) The irresponsibility of adding even more traffic chaos and pollution risk on the Shurdington Road, Moorend Road, Church Road and Bath Road. My young neighbour risks an accident every day, as she teaches at Birdlip School, and rather than try to make the journey via the Shurdington Road which she finds impossible, travels via Leckhampton Hill onto the 417/9 where she has to take the disastrous right turn off to Birdlip and Stroud. To even think of increasing traffic on the Shurdington Road is unbelievable.

We must accept that 650 houses will mean minimum of 1,000 vehicles. However we must also add a Doctors' surgery. The present surgery which will close on Moorend Road has vehicles in and out all day. Because of its present location - in the middle of dense housing, where many patients are able to walk to the Surgery. If however it moves to Farm Lane there will be greater need for patients to travel by car along the Shurdington Road a huge amount of traffic. A mini market - more traffic. Primary School - more traffic, and other small business units -more traffic.

The result of this gross irresponsibility will be utterly disastrous to Church Road - where even the developers admit they have no solution.

2) The very real risk of flooding which may well ensue with dangers of such flooding in Warden Hill.

3) The lack of infrastructure, i.e. Schools, particularly Secondary.

4) The loss of amenity/green areas for families and particularly young children to enjoy. This area is well used by families/walkers - this at a time when organisations such as the National

Trust and CPRE are emphasising the importance of such amenities for young people. Once lost to Cheltenham, it can never be returned.

5) Cheltenham has been described as the Jewel of the Cotswolds, and the entrance to it from the A46 presently helps to add credence to this title - long may that remain.

5 Merlin Way
Cheltenham
Gloucestershire
GL53 0LS

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

5 Naunton Way
Cheltenham
Gloucestershire
GL53 7BQ

Comments: 16th October 2013
Letter attached: BATCH 2 (14th - 18th October)

5 Nourse Close
Cheltenham
Gloucestershire
GL53 0NQ

Comments: 4th November 2013
I would like to submit my objection to 13/01605/OUT - 650 Houses on Leckhampton Fields because:

Approximately an additional 1000 vehicle increase exiting onto Shurdington Road. The A46 Shurdington Road is already very busy and often grid locked during rush hours and Church Road leading to Leckhampton and Cheltenham is difficult and dangerous at the best of times. Both roads already break the EU levels of Air Pollution in the winter months, increased volume of traffic make only increase this. Local schools are already oversubscribed and neither of the local senior schools intend to expand. Cheltenham doctors, dentists and hospitals will also be put under more pressure. Lack of viable public transport possibilities. The area already is susceptible to flooding.

5 Nourse Close
Cheltenham
Gloucestershire
GL53 0NQ

Comments: 4th November 2013
I would like to submit my objection to 13/01605/OUT - 650 Houses on Leckhampton Fields because:

Approximately an additional 1000 vehicle increase exiting onto Shurdington Road. The A46 Shurdington Road is already very busy and often grid locked during rush hours and Church Road leading to Leckhampton and Cheltenham is difficult and dangerous at the best of times. Both roads already break the EU levels of Air Pollution in the winter months, increased volume of

traffic make only increase this. Local schools are already oversubscribed and neither of the local senior schools intend to expand. Cheltenham doctors, dentists and hospitals will also be put under more pressure. Lack of viable public transport possibilities. The area already is susceptible to flooding.

5 Pickering Close
Cheltenham
Gloucestershire
GL53 0LE

Comments: 10th November 2013
I object to this planning proposal on the following grounds:

- I am unconvinced that Cheltenham needs these houses. Whilst it is true that there is a housing shortage in Cheltenham, we should be meeting this need by building first on any available brownfield sites and then reassess whether any further housing is needed. This has not been done and, until it is, any planning proposal on greenfield sites such as this should be rejected.

- These houses are being built in an area which already has severe traffic problems. Every weekday, the traffic queues in every direction around the Shurdington Road/Moorend Park Road crossroads become extensive, particularly in the mornings for people travelling in to Cheltenham when the tailbacks can easily exceed half a mile. This is a serious issue for local residents (noise; pollution which exceeds EU limits; difficulty driving anywhere), commuters into Cheltenham (delays; fuel consumption) and local businesses (harder to recruit; late and stressed employees). This plan will make these conditions even worse and so should be rejected.

- This area is prone to flooding and the fields help to protect existing houses from flash-floods. It seems rather foolish to build houses where the new owners can expect to have their ground floor go under water during heavy rains, and increase the risk to nearby residents. I also cannot imagine any sensible purchasers would want to live in such a risky area if they understood what could happen.

- There is strong local opposition to the proposed development. If the council is there to represent the people of Cheltenham, as it surely should be, then the strength of opinion against the proposal should mean that it is immediately rejected.

- These fields are much-loved by the local residents and there is an application in progress for designation as a Local Green Space of Special Community Value. Even if this application is unsuccessful, it is clear that the fields are well-used for recreation and significantly enhance the views from the Leckhampton Hill Area of Outstanding Natural Beauty. The benefits of outdoor activity to people's health and wellbeing is well-recognised, so this proposal is effectively being made at the expense of the people who already live here.

Should this proposal go ahead (and I do not believe it should), I believe that there are important enhancements and constraints that should be applied:

- The green spaces which are shown in the outline plan should be rigorously enforced. The amount of green space shown in the plan is commendable, but I am concerned that these have been put in as a cynical way to make the plans more attractive and that they will be gradually reduced as the development process proceeds. The council must be robust and vigilant to ensure that the green spaces are protected and that any reduction which the developers propose is not allowed to happen.

- The plans should be changed to incorporate more green space within the proposed housing. A good arrangement would be to have communal squares and similar focal areas, with easy pedestrian access between them. The current proposed arrangement of housing is a typical, socially-isolating and uniform modern estate with rows of houses along a road edge. Embedded open spaces would surely be preferable to the proposed arrangement, where the communal orchard and play areas are pushed beyond the day-to-day routes of the residents.

- The existing streams should form central features in the estate which everyone sees every day. This is important because watercourses which are out-of-sight can easily become sad dumping grounds for rubbish: the only sustainable way to avoid this is to make the residents proud of them by making them visible. It will also make the estate more attractive to live in and help people remember what it used to be like.

- The architecture should be very varied and reflect Leckhampton. Bland built-off-plan housing estates are unpleasant, and once they take hold, the whole character of an area becomes just another commuter suburb. Leckhampton is full of varied and interesting houses: please add to the local character and enhance it, rather than begin its homogenisation. This will require robust oversight from the council, as most modern housing estates are very similar to one another and the developers will not do something different unless it is forced upon them.

- The new estate should be surrounded by thick hedgerows, so that the edges of the existing roads outside of the proposed estate remain wild and attractive. Hedgerows are mentioned in the supporting documentation, but it would be very easy for the council to modify the plans to make these a key part of the proposed development which cannot be compromised during the development process.

- The mitigations for the impact on local wildlife should be improved. The documentation which accompanies the plans makes much of the way that bat-boxes will be installed and the existing badger sett will not be disturbed, but this rather misses the point: a good wildlife habitat requires plenty of supporting food and foraging area to thrive.

- The green spaces should be landscaped to include wild areas and water. The current plan is in danger of containing plain, open grassy spaces with very little interest: this benefits nobody.

- Ensure that any road names are truly interesting and reflect the local area. Nauseating bland names such as Harmony Drive really should be avoided.

- Incorporate better water management, as promoted by organisations such as the Wildfowl and Wetlands Trust and the RSPB in their document Sustainable drainage systems: maximising the potential for wildlife and people.

5 Rosehip Court
Up Hatherley
Cheltenham
Gloucestershire
GL51 3WN

Comments: 11th October 2013
Letter attached: BATCH 1 (3rd - 11th October)

5 Southcourt Drive
Cheltenham
Gloucestershire
GL53 0BU

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

5 Southfield Rise
Cheltenham
Gloucestershire
GL53 9LH

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

5 The Lanes
Cheltenham
Gloucestershire
GL53 0PU

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

5 Westside Park
The Reddings
Cheltenham
Gloucestershire
GL51 6RT

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

5 Westside Park
The Reddings
Cheltenham
Gloucestershire
GL51 6RT

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

50 Hall Road
Cheltenham
GL53 0HE

Comments: 21st October 2013
My comments on the application are,

Leckhampton parish council application for local green space has not been considered properly.

There are insufficient secondary schools to support these houses

The road network will not support the extra vehicles and pollution levels are already in breach of EU levels.

The joint core strategy has not been finlised so this application should not be considered until it has been finalused.

50 Hall Road
Leckhampton
Cheltenham
GL53 0HE

Comments: 21st October 2013
I am totally against the plan for development off Kidnappers Lane and the small holdings area for 650 houses.

1. Destroying a natural eco-system:
The area is the most stunning greenbelt land retaining some original fields in an area heavily built on heavily already.

The area is a wildlife haven of tranquillity and beauty and if houses were built here the original land would be gone forever.

2. Over-loading the small roads with high volumes of traffic:
As residents of Leckhampton we already find the heavy volume of traffic around the small roads dangerous.

Our street is a rat run with motorists driving too fast and carelessly we have two near misses with children walking on the streets and motorists driving carelessly.
Hall Road would be used even more as a cut through if Kidnappers Lane was shut off.
Additionally I would have to drive through town to get to my place of work instead of using Kidnappers Lane as a traffic que free route.

3. Crime:
The crime rate with burglary/theft around the local community is already very high.
The additional volume of people will exacerbate this problem.

4. Land for food-production:
The land should be used for the surrounding community to grow their own produce.

Please do not allow the destruction of such a special area.

50 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0BE

Comments: 23rd October 2013
I am in full agreement with the issues raised by Leckhampton Green Land Action Group (LEGLAG) with respect to the development of housing around Kidnappers Lane.

We have concerns relating to; traffic congestion, infrastructure and public services which would all be stretched beyond their existing capability. Once green land is taken for development and there is no possibility of returning this open space to agricultural or public use and it would be a loss for future generations.

Therefore this application is premature until the Joint Core Strategy is finalised.

50 Moorend Park Road
Cheltenham
Gloucestershire
GL53 0JY

Comments: 29th October 2013
I am writing to voice my objections to the plans for 650 new houses in Leckhampton fields.
We believe that these additional houses would lead to significant degradation of the area of Cheltenham, needlessly taking up valuable greenspace and leading to significant increases in traffic congestion in an area that is already at bursting point.

If these homes are built it is estimated that an extra 1000 vehicles a day will enter onto Shurdington Road. This is surely going to cause considerable problems in the area for a road that is already heavily congested during rush hour times. Any suggestion that the majority of the residents of the new area will use public transport as opposed to driving is unrealistic. Air pollution levels already break EU regulations on the A46 and Church road during winter months. Any increase in the number of vehicles and in waiting times will only further compound this issue.
With this development the character and setting of this whole area of Cheltenham would be irrevocably changed for the worse. Valuable farming land and open green space would be lost and it would also lead to a loss of biodiversity and potential archaeological sites. This development would impact negatively on the residents of South West Cheltenham as the balance between the urban and rural, which is such an important positive feature of Cheltenham as a whole, would be lost.

Also parts of the planned development are prone to flooding and building would surely exacerbate this, possibly leading to problems for neighbouring pre-existing properties. A specific example was the flooding in 2007 of more than 40 properties in Warden HIll, which is downhill from the proposed development site.

We hope you will take account of the extremely strong local opposition to this proposal.

50 Moorend Park Road
Cheltenham
Gloucestershire
GL53 0JY

Comments: 29th October 2013
I strongly object to this proposal for the following reasons:

The existing road network around this proposed development is already over capacity, the numbers of extra cars generated by this development would be make the A46 and Church Road even more over congested. Currently Church Road is dangerous for children walking to school, this will only get worse. Also air pollution levels already break EU levels in the winter months on Church Road and the A46.

Already there are insufficient secondary school places at Bournside and Balcarras, this will be made worse but this development as there are no plans for expansion at either of these schools.

The application could create a precedent for other planning applications in this area which would destroy the amenity value and quality of life for residents currently living in Leckhampton.

Also I believe that this application is premature and should not go before the Planning Committee until the Joint Core Strategy for the area of Cheltenham, Tewkesbury and Gloucester City has been finalised. There are more appropriate sites on the Tewkesbury/Cheltenham boarder that would better suited for development and could support a new infrastructure these should seriously be considered.

51 Canterbury Walk
Cheltenham
Gloucestershire
GL51 3HN

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

52 Collum End Rise
Leckhampton
Cheltenham
Gloucestershire
GL53 0PB

Comments: 15th October 2013
Letter attached: BATCH 2 (14th - 18th October)

52 Collum End Rise
Leckhampton
Cheltenham
Gloucestershire
GL53 0PB

Comments: 15th October 2013
Letter attached: BATCH 2 (14th - 18th October)

53 Collum End Rise
Leckhampton
Cheltenham
Gloucestershire
GL53 0PA

Comments: 13th October 2013
I would like to register my objection to the above Planning Application and wish to make the following comments.

Design
The design of the development as implied in the public exhibition boards is dull and uninspired. More information should be provided on the proposed quality of the design and materials and minimum space standards. The stated densities and development heights are meaningless without a statement of habitable rooms, beds, sqft per acres etc and space standards. Without these the application should not be considered.

Highways
An additional estimated 1000 extra vehicles will all exit onto the Shurdington Road. As a cyclist who uses Church Street, Leckhampton Lane and Shurdington Road to commute to work, the existing road network is becoming more congested and dangerous for vulnerable and sustainable

road users. While the additional traffic may reduce the speed of vehicles my personal experience is that increases in the volume of traffic will make cycling more dangerous. It is premature to consider this application without the JCS transport plan in place and traffic modelling in place.

Environmental Impact
Air pollution levels already break EU levels in the winter months on Church Road and the A46. Additional traffic and housing will only increase the levels of pollution. A reduction in fields and planting the 'green lung' will further exacerbate the issues of Air Pollution. Areas of Leckhampton and Shurdington Road are prone to flooding. Removing a large area of natural attenuation is not a sustainable solution

Amenity
The loss of green land will directly impact on the amenity of neighbouring and general residents of Cheltenham. The loss of amenity and countryside will have a negative impact on the social and psychological well-being of residents. The scale and location of the proposed development has not been adequately considered in relation to the AONB or green belt. Any impact on the AONB will be a permanent legacy or a premature planning decision Leckhampton has an insufficient number of senior school places and primary places are over prescribed. Any proposed development of this scale will overburden the existing education infrastructure.

Employment
There are currently no developments or identified land for employment in the Shurdington / Leckhampton Areas. In practise employment land is being lost in favour of residential development. Without corresponding development for employment all new residents will need to travel to their jobs. This is not sustainable development.

Comments: 12th May 2014
I wish to object to the proposals. They are ill considered and do not improve or enhance the character or appearance or the site or the larger area.

Highway safety / Traffic

The REVISED MAXIMUM BUILDING HEIGHTS PARAMETER PLAN and the masterplan show different building configurations (namely the primary school).

The proposed highways strategy is short sighted and will add to already congested and dangerous roads with an increase in traffic and pollution from vehicles and a detrimental impact on residents health. The additional traffic created along Shurdington Road will push more traffic on to Leckhampton Lane and Church Street which is already at dangerous levels especially around local schools.

The alleged CHURCH ROAD IMPROVEMENTS seem like a hollow gesture that will not solve any of the traffic issues created by the proposals.

Layout and density of building
There is insufficient information to comment on the proposals. Given the sensitivity of the site the sheer magnitude of dwellings is inappropriate. The layouts shown are unimaginative are poorly conceived.

Design, appearance and materials
Given the size of the proposed development and sensitivity of the significantly more information should be provided on the proposed quality and design intent. If given permission for all or (hopefully) a significantly reduced number of dwellings it is hard to see how the information in the submission gives any security on the quality of the proposals.

Cheltenham is a world renowned regency town with an exceptional architectural heritage. The scale and nature of the proposed development will, like so many other developments, create a non-descript and soulless development on a major access route to town.

Nature conservation
The proposed site is a vital oasis for nature and provides an essential local amenity for residents to enjoy the countryside. Green spaces are not being afforded the protection they deserve or given the recognition of their importance in providing space for residents health and wellbeing.

Flooding
The recent heavy rains caused nearby gardens to flood that have not flooded in known history. The proposals appear to have missed the potential levels of rainfall and the potential impact of the proposed level of development.

54 Caernarvon Road
Cheltenham
Gloucestershire
GL51 3JP

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

54 Caernarvon Road
Cheltenham
Gloucestershire
GL51 3JP

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

54 Caernarvon Road
Cheltenham
Gloucestershire
GL51 3JP

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

54 Moorend Road
Cheltenham
Gloucestershire
GL53 0HD

Comments: 22nd October 2013
Letter attached: BATCH 3 (21st - 25th October)

55 Collum End Rise
Leckhampton
Cheltenham
Gloucestershire
GL53 0PA

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

55 Pilley Crescent
Cheltenham
Gloucestershire
GL53 9ES

Comments: 23rd October 2013
I write to state my strong objection to planning application 13/01605/OUT for the erection of 650 houses on land around Kidnappers Lane in Leckhampton.

Yet again we are faced with what is in essence the same proposal as before, to build on and spoil forever a very large slice of Leckhampton's green fields. It was unacceptable before and it is unacceptable now. The various reasons for objection all still apply.

I strongly object to these proposals to build houses in Leckhampton and Shurdington. I consider that such construction would cause severe and permanent damage to the environment of these places. Valuable landscape (the AONB and Leckhampton Hill) would be damaged. It would adversely affect the outstanding views, from, and towards, the Cotswold escarpment

I do not think that landscaping can possibly obscure the damage, which would be clearly visible from the high ground for miles around. It seems to me that building as proposed would be a significant step towards joining Cheltenham and Gloucester, so that a single urban area would result. The site is in the Green Belt, which is intended to prevent coalescence between Cheltenham and Gloucester.

I consider that the additional traffic which such a scheme would generate would have a major adverse impact upon Leckhampton and the surrounding area.

The effect on Cheltenham will be incredibly undesirable, with a larger population, more traffic, more congestion and more shops, and the negatives effects on the natural environment and local wildlife will be horrific. Flooding in the area is already a difficulty which the development seems likely to exacerbate.

We live in transient times, and I accept that change must happen but I strongly believe this should only be the case if the change is for the better these proposals seem purely motivated by money and not in the interests of the current or future population.

I would question how you have come to the ridiculous figure of 33,000 houses to be built in the Cheltenham and it's local areas, this seems to be a gross over estimation of requirement unless you are actually intent on encouraging a vast population inhabiting the region from other areas of the country and from abroad?

Having grown up in the area, these fields were my playground, as they were for many children in the community and continue to be so. A safe haven from pollution and traffic, with an abundance of wildlife on our doorstep. Yet you actively seek to deny future generations this healthy lifestyle, in a time when childhood obesity is ever encroaching on our nation, this is totally ridiculous.

It is about time that politicians started to listen to the people of this nation before they abandon it completely. It would be a grave mistake to proceed with the scheme.

55 Pilley Crescent
Cheltenham
Gloucestershire
GL53 9ES

Comments: 23rd October 2013
I write to state my strong objection to planning application 08/01443/OUT for the erection of 650 houses on land around Kidnappers Lane in Leckhampton.

Yet again we are faced with what is in essence the same proposal as before, to build on and spoil forever a very large slice of Leckhampton's green fields. It was unacceptable before and it is unacceptable now. The various reasons for objection all still apply.

I strongly object to these proposals to build houses in Leckhampton and Shurdington. I consider that such construction would cause severe and permanent damage to the environment of these places. Valuable landscape (the AONB and Leckhampton Hill) would be damaged. It would adversely affect the outstanding views, from, and towards, the Cotswold escarpment

I do not think that landscaping can possibly obscure the damage, which would be clearly visible from the high ground for miles around. It seems to me that building as proposed would be a significant step towards joining Cheltenham and Gloucester, so that a single urban area would result. The site is in the Green Belt, which is intended to prevent coalescence between Cheltenham and Gloucester.

I consider that the additional traffic which such a scheme would generate would have a major adverse impact upon Leckhampton and the surrounding area.

The effect on Cheltenham will be incredibly undesirable, with a larger population, more traffic, more congestion and more shops, and the negatives effects on the natural environment and local wildlife will be horrific. Flooding in the area is already a difficulty which the development seems likely to exacerbate.

We live in transient times, and I accept that change must happen but I strongly believe this should only be the case if the change is for the better these proposals seem purely motivated by money and not in the interests of the current or future population.

I would question how you have come to the ridiculous figure of 33,000 houses to be built in the Cheltenham and it's local areas, this seems to be a gross over estimation of requirement unless you are actually intent on encouraging a vast population inhabiting the region from other areas of the country and from abroad?

Having grown up in the area, these fields were my playground, as they were for many children in the community and continue to be so. A safe haven from pollution and traffic, with an abundance of wildlife on our doorstep. Yet you actively seek to deny future generations this healthy lifestyle, in a time when childhood obesity is ever encroaching on our nation, this is totally ridiculous.

It is about time that politicians started to listen to the people of this nation before they abandon it completely. It would be a grave mistake to proceed with the scheme.

56 Hall Road
Cheltenham
Gloucestershire
GL53 0HE

Comments: 22nd October 2013
Letter attached: BATCH 3 (21st - 25th October)

57 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PF

Comments: 23rd October 2013
Letter attached: BATCH 3 (21st - 25th October)

57 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PF

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

57 Collum End Rise
Leckhampton
Cheltenham
Gloucestershire
GL53 0PA

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

57 The Park
Cheltenham
Gloucestershire
GL50 2SA

Comments: 24th October 2013
Letter attached: BATCH 3 (21st - 25th October)

58 Alma Road
Cheltenham
Gloucestershire
GL51 3NB

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

58 Collum End Rise
Leckhampton
Cheltenham
Gloucestershire
GL53 0PB

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

59 Moorend Crescent
Cheltenham
Gloucestershire
GL53 0EJ

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

59 Upper Norwood Street
Cheltenham
Gloucestershire
GL53 0DU

Comments: 22nd November 2013
I assume any proposed housing developments would not even be tabled until draft JCS has been fully and logically analysed. In the event the above proposal is considered, the potential traffic flow must take the highest priority. At peak times - and when surrounding roads are closed due to roadworks, weather conditions or RTAs (such as Crickley Hill recently) - Shurdington Road is often snarled up, sometimes along its whole length. This also applies to its arteries, such as Leckhampton Lane, Church Road, Moorend Road, etc. Also, consideration must be given to increased pollution, flood risk, pressure on public transport and amenities, and loss of popular and well-used green spaces.

6 Charnwood Road
Cheltenham
Gloucestershire
GL53 0HJ

Comments: 23rd October 2013
Letter attached: BATCH 3 (21st - 25th October)

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

6 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PR

Comments: 23rd October 2013
I am writing to object to the above planning application in the Leckhampton, Kidnappers Lane area for some 650 houses plus commercial units, Surgery and school, care home and offices.

My main areas of objection are:

1) traffic congestion and air quality for existing residents.
As a resident of Church Road and frequent user of the A46 Shurdington Road, it is clear that both of these roads are currently operating over capacity. The air quality on Church Road is already above recommended EU levels. The increase in traffic that this development would bring would be catastrophic for both roads. As a parent at Leckhampton primary school, it is already incredibly difficult to make the short journey to/from school each day, due to the existing congestion. An increase in traffic will make this even more difficult, and I fear that the frustration of being stuck in traffic along church road will lead to rash driving decisions and more accidents involving school children.

2) secondary school places.
There is already a shortage of secondary school places in the town, this being a particular issue for existing residents in the Leckhampton area. There is no plan as to where incoming children will go or how this will affect existing families. Also, tying in with my first point above, if we don't know where children will be travelling to for secondary education, how can the traffic models be considered accurate?

3) loss of green space
The area of the proposed development makes up part of the last remaining green areas within the town. Once it is gone, it will be lost forever. I believe this will fundamentally and detrimentally change the nature of the area in an irreversible way.

Finally, as a resident living very close to the proposed development and being aware that should it be approved my day to day life will be affected, I am surprised that I have not received any notice of the application from the council. I have only been made aware by legLag.

Please take the views of the local residents into account when considering this application.

6 Collum End Rise
Leckhampton
Cheltenham
Gloucestershire
GL53 0PB

Comments: 31st October 2013
Letter attached: BATCH 2 (14th - 18th October)

6 Fairfield Avenue
Cheltenham
Gloucestershire
GL53 7PN

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

6 Highwood Avenue
Cheltenham
Gloucestershire
GL53 0JJ

Comments: 15th November 2013
As long terms residents of Leckhampton we wish to register our significant concerns / objections to the above planned development.

Our grounds for this include:

- The high likelihood of significant traffic congestion in the area as a whole, and in particular Church Road, Shurdington Road, Moorend Pak Road.

- The increase in traffic pollution arising from the above, and increased risk of traffic related accidents / incidents

- Longer travel / commuting times into Cheltenham which may well impact local shops and employment

- Loss of amenity value of the Leckhampton fields

We'd be grateful if these could be taken into full account in considering the development.

6 Jasmin Way
Up Hatherley
Cheltenham
Gloucestershire
GL51 3HZ

Comments: 16th October 2013
Letter attached: BATCH 2 (14th - 18th October)

6 Larch Rise
Cheltenham
Gloucestershire
GL53 0PY

Comments: 23rd October 2013
Letter attached: BATCH 3 (21st - 25th October)

6 Merlin Way
Cheltenham
Gloucestershire
GL53 0LT

Comments: 6th December 2013
Letter attached: BATCH 9 (2nd - 6th December)

6 Nourse Close
Cheltenham
Gloucestershire
GL53 0NQ

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

6 Nourse Close
Cheltenham
Gloucestershire
GL53 0NQ

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

6 St Albans Close
Cheltenham
Gloucestershire
GL51 3DW

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

6 St Stephens Manor
Cheltenham
Gloucestershire
GL51 3GF

Comments: 16th October 2013
Cheltenham needs more housing of all sizes. If land must be developed to meet this need, then the site proposed is ideal. Visually it is not attractive. It is contiguous to the town and existing Kidnappers Lane housing which is preferable to isolated developments which would increase commute distances to multiple services such as secondary schools, hospitals, main shops etc. Residents can make use of the excellent bus services that run along Shurdington Lane.

I support the application

6 Station Close
Cheltenham
Gloucestershire
GL53 0AB

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

6 Undercliff Avenue
Cheltenham
Gloucestershire
GL53 9AB

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

6 Vineries Close
Cheltenham
Gloucestershire
GL53 0NU

Comments: 19th October 2013
I currently work as an Urban Design Director for a Large Planning Consultancy and therefore do not object to development and can understand the reasoning behind the promotion of this site.

General Comments
I would though like to see this scheme promoted as a good example of current urban design and architecture. Although appearance is reserved i am uninspired by this unimaginative scheme. The current proposal has no mechanisms to ensure a distinctive and memorable PLACE. Para 59 of the NPPF recommends 'Local planning authorities should consider using design codes where they could help deliver high quality outcomes' and i think this would help with this scheme if approved. Design reviews and Building for Life Assessments are also other mechanisms that should be used as part of this outline planning process.

Specific Comments
The school currently proposed is 1.7ha and i would conclude that this is a 1 Form Entry Primary School (210 places). Therefore there is no room for the school to expand in the future and it would soon see increased pressure for school places as seen in the current capacity for the area (Leckhampton Primary School at 423 pupils and demand high). For a scheme this size this land take is too small and a min of 2.1ha should be provided to allow for a 2FE school (420 pupils as seen in current schools) or larger that can allow for school building expansion in the future and be adaptable to changes. This is also a more efficient use of land.

Is the Density specific to the scheme? I notice the main spine road is included within the 15.4ha resi land area and not netted out from the developable area. The proposed 'tree lined routes' are also not allowed for in an average 40dph layout. If room and land take is not allowed for at this stage for tree panting etc then it will be near impossible at reserved matters. The density is also very 'current thinking' and i have no problem with a crude DPH calculation but would like to see more thought in the proposed character areas and how the landscape character can also be evident within the scheme. Currently it looks like a few balancing ponds and mown or unmown grass creating pos.

An informal greenspace to the west side of kidnappers lane should be introduced to setback development and respect the existing context. Surely houses up against this hedgerow would create a more urban character than anticipated.

The allotments are currently proposed in an area where it will be difficult to create new vehicular access and outside of an appropriate walking distance form the new development that it should serve. The allotments would be better placed to the northern side of Lotts Meadow to allow for vehicular access from the new junction. This would limit the new breaks in the existing hedgerow. Sportspitches although important recreational spaces would destroy the character of Lotts Meadow and should not be promoted, it is only a 400m walking to the existing pitches to the east and these could benefit with upgrading instead. Maybe dual use of the primary school playing field should be allowed.

61 Charlton Lane
Cheltenham
Gloucestershire
GL53 9DY

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

62 Canterbury Walk
Cheltenham
Gloucestershire
GL51 3HF

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

62 Moorend Park Road
Cheltenham
Gloucestershire
GL53 0JY

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

63 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PF

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

63 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0BS

Comments: 23rd October 2013
Letter attached: BATCH 3 (21st - 25th October)

63 Shurdington Road
Cheltenham
Gloucestershire
GL53 0JG

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

64 Moorend Park Road
Cheltenham
Gloucestershire
GL53 0JY

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

64 Westbury Road
Cheltenham
Gloucestershire
GL53 9EW

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

65 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PF

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

65A Moorend Crescent
Cheltenham
Gloucestershire
GL53 0EW

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

66 Century Court
Montpellier Grove
Cheltenham
Gloucestershire
GL50 2XR

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

67 Merestones Drive
Cheltenham
Gloucestershire
GL50 2SU

Comments: 1st October 2013
With reference to the above planning application, I strongly oppose the proposed development based on a number of concerns as detailed below.

Firstly having created an account on your website as advised on your letter dated 20th September 2013, I am still unable to leave feedback on it which suggests that others may have the same problem and therefore you may not receive all of the necessary feedback objecting to the proposed development. I would also be interested to know how many local households received the letter and why we were not aware of the plans earlier despite your website indicating that there has been community engagement.

The increased volume of traffic associated with 650 new dwellings will have a major impact on the whole area and particularly the Shurdington Road and it's junction with Moorend Park Road. The report on your website already acknowledges the acceptance of existing congestion and as our garden borders the Shurdington Road I strongly oppose any significant increase in traffic and the associated increase in pollution levels.

I also strongly object to a new priority junction and separate bus exit being built just across the road from our rear gate due to major concerns regarding traffic noise and pollution. There is a significant difference in noise and pollution between vehicles travelling at a steady speed as now and the start / stop driving at a major junction. Your proposals indicate that the principal means of access are not reserved and I strongly suggest that, should this development go ahead, any new major junctions are made further south on the Shurdington Road where there are no houses directly opposite.

In addition to the increased disturbance from the additional traffic, there will also be significant noise and disturbance from the new development and its' inhabitants, which again I am opposed to.

At present our property is not overlooked from the Shurdington Road, however new dwellings will probably have a view in to our private garden, patio area, kitchen and two bedrooms at the rear of the property. I object very strongly to this as it will invade our privacy greatly.

The plans on the website indicate that the new dwellings will have a significant visual impact and block our view of Leckhampton Hill and the surrounding countryside which again I am strongly opposed to as we are in a bungalow.

Flooding is another area of great concern and although the 279 page published report on the website addresses many factors, the conclusions are not definitive but refer to using commonly used modelling methods and best practice. Having seen the result of the floods in July 2007 I would strongly suggest that any additional building in the area and in close proximity to the two streams that run either side of Merestones Drive will only increase the possibility of flooding in the area due to the loss of natural drainage. This is another reason for me to object to the proposals.

The loss of the nearby countryside will be a great loss to us and our children and I would like to draw your attention to the report made by Jeremy Doe on behalf of the Gloucestershire Wildlife Trust on the north-west side of the A46 at SO939205, on 30/4/12. In this report a number of rare species of plants were found and the grass verge in question was then made a conservation road verge (CRV). Having walked frequently on the proposed site, I am sure that these species also exist on the proposed area for development and this should be fully investigated before final plans are made.

In summary, the whole development will have a major impact on the quality of life of local people and will also negatively impact house prices in the area as well as local residents having to endure years of noise, dust and building traffic.

Cheltenham is a great town to live in and the open green areas are one of the reasons why it is different and better than other towns. There must be many other sites outside of the town where the proposed impact of such a huge development would be far less.

I and many others will strongly oppose this development and I hope that another solution is found. I would be happy to discuss my concerns with you if required.

67 Moorend Park Road
Cheltenham
Gloucestershire
GL53 0LG

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

67 Moorend Park Road
Cheltenham
Gloucestershire
GL53 0LG

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

67 Moorend Park Road
Cheltenham
Gloucestershire
GL53 0LG

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

67 Moorend Park Road
Cheltenham
Gloucestershire
GL53 0LG

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

67 Moorend Park Road
Cheltenham
Gloucestershire
GL53 0LG

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

68 St Stephens Road
Cheltenham
Gloucestershire
GL51 3AE

Comments: 16th October 2013
Letter attached: BATCH 2 (14th - 18th October)

69 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0BS

Comments: 18th October 2013
Letter attached: i n documents BATCH 2 (14th - 18th October)

7 Charnwood Close
Cheltenham
Gloucestershire
GL53 0HL

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

7 Chestnut Place
Cheltenham
Gloucestershire
GL53 0QE

Comments: 6th December 2013
Letter attached: BATCH 9 (2nd - 6th December)

7 Edward Wilson Villas
Cheltenham
Gloucestershire
GL50 2LP

Comments: 16th October 2013
Letter attached: BATCH 2 (14th - 18th October)

7 Greenhills Close
Cheltenham
Gloucestershire
GL53 9EY

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

7 Hidcote Avenue
Up Hatherley
Cheltenham
Gloucestershire
GL51 3FB

Comments: 16th October 2013
Letter attached: BATCH 2 (14th - 18th October)

7 Kenelm Gardens
Cheltenham
Gloucestershire
GL53 0JW

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

7 Pilford Close
Cheltenham
Gloucestershire
GL53 9HA

Comments: 16th November 2013
This development will add significant congestion to the area including the A46. There is also a shortage of primary and secondary school places which will only be made more of an issue with this development.

7 Pilley Lane
Cheltenham
Gloucestershire
GL53 9EX

Comments: 28th October 2013
We are writing to voice our objections to the plans for 650 new houses in Leckhampton fields.
We believe that these additional houses would lead to significant degradation of the area of Cheltenham, needlessly taking up valuable greenspace and leading to significant increases in traffic congestion and as a result pollution.

If these homes are built it is estimated that an extra 1000 vehicles a day will enter onto Shurdington Road. This is surely going to cause considerable problems in the area for a road that is already heavily congested during rush hour times. Any suggestion that the majority of the residents of the new area will use public transport as opposed to driving is unrealistic. Air pollution levels already break EU regulations on the A46 and Church road during winter months. Any increase in the number of vehicles and in waiting times will exacerbate this.

With this development the character and setting of this whole area of Cheltenham would be irrevocably changed for the worse. Valuable farming land and open green space would be lost and it would also lead to a loss of biodiversity and potential archaeological sites. This development would impact negatively on the residents of South West Cheltenham as the balance between the urban and rural, which is such an important positive feature of Cheltenham as a whole, would be lost.

The proposal includes a primary school but that still leaves the problem of how secondary school places will be able to accommodate families from this new development.

Finally, parts of the planned development are prone to flooding and building would surely exacerbate this, possibly leading to problems for neighbouring pre-existing properties. A specific example was the flooding in 2007 of more than 40 properties in Warden Hill, which is downhill from the proposed development site.

We hope you will take account of the extremely strong local opposition to this proposal.

7 Southcourt Drive
Cheltenham
Gloucestershire
GL53 0BU

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

7 Tayberry Grove
Up Hatherley
Cheltenham
Gloucestershire
GL51 3WF

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

7 The Spindles
Cheltenham
Gloucestershire
GL53 0QD

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

70 Farmfield Road
Cheltenham
Gloucestershire
GL51 3RA

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

70 Hall Road
Cheltenham
Gloucestershire
GL53 0HE

Comments: 16th October 2013
I strongly object to this proposal for the following reasons:

The existing road network around this proposed development is already over capacity, the numbers of extra cars generated by this development would be make the A46 and Church Road even more over congested. Currently Church Road is very dangerous for children walking to

school, this will only get worse. Also air pollution levels already break EU levels in the winter months on Church Road and the A46.

Currently there are insufficient secondary school places at Bournside and Balcarras, this will be made worse but this development as there are no plans for expansion at either of these schools.

The application could create a precedent for other planning applications in this area which would destroy the amenity value and quality of life for residents currently living in Leckhampton.

Also I believe that this application is premature and should not go before the Planning Committee until the Joint Core Strategy for the area of Cheltenham, Tewkesbury and Gloucester City has been finalised.

Comments: 16th October 2013
I strongly object to this proposal for the following reasons:

The existing road network around this proposed development is already over capacity, the numbers of extra cars generated by this development would be make the A46 and Church Road even more over congested. Currently Church Road is very dangerous for children walking to school, this will only get worse. Also air pollution levels already break EU levels in the winter months on Church Road and the A46.

Currently there are insufficient secondary school places at Bournside and Balcarras, this will be made worse but this development as there are no plans for expansion at either of these schools.

The application could create a precedent for other planning applications in this area which would destroy the amenity value and quality of life for residents currently living in Leckhampton.

Also I believe that this application is premature and should not go before the Planning Committee until the Joint Core Strategy for the area of Cheltenham, Tewkesbury and Gloucester City has been finalised.

71 Canterbury Walk
Cheltenham
Gloucestershire
GL51 3HN

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

71 Painswick Road
Cheltenham
Gloucestershire
GL50 2EX

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

71 St Michaels Road
Cheltenham
Gloucestershire
GL51 3RP

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

76 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PD

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

76 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0BL

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

78 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PD

Comments: 15th October 2013
I would like to stress our objections to the proposed development in the area. It is superfluous to current and future needs and the only people to gain from this are the developers. Those of us who live in the area already value highly what we have and what we will lose if this goes ahead. It has not been thought through because a sensible plan would:

a) realise that the proposed development is far too large for the space dedicated to it (it is like adding a town the size of Winchcombe in an instant)

b) deal explicitely with the existing problems of pollution and traffic, never mind the increase in them that will inevitably follow if this development goes ahead.

It is a flawed plan based on flawed methodology and presented meretriciously with tempting offers of schools and surgeries that are only required if the development goes ahead.

79 Century Court
Montpellier Grove
Cheltenham
Gloucestershire
GL50 2XR

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

79 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PF

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

8 Arden Road
Cheltenham
Gloucestershire
GL53 0HQ

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

8 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 24th October 2013
Letter attached: BATCH 3 (21st - 25th October)

Comments: 13th December 2013
Letter attached: BATCH 10 (9th - 13th December)

8 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 24th October 2013
Letter attached: BATCH 3 (21st - 25th October)

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

8 Justicia Way
Up Hatherley
Cheltenham
Gloucestershire
GL51 3YH

Comments: 23rd October 2013
Letter attached: BATCH 3 (21st - 25th October)

8 Larch Rise
Cheltenham
Gloucestershire
GL53 0PY

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

8 Leckhampton Farm Court
Leckhampton
Cheltenham
Gloucestershire
GL51 3GS

Comments: 16th October 2013
Letter attached: BATCH 2 (14th - 18th October)

8 Peregrine Road
Cheltenham
Gloucestershire
GL53 0LR

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

8 Rochester Close
Cheltenham
Gloucestershire
GL51 3DJ

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

8 Station Close
Cheltenham
Gloucestershire
GL53 0AB

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

8 The Spindles
Cheltenham
Gloucestershire
GL53 0QD

Comments: 23rd October 2013
Letter attached: BATCH 3 (21st - 25th October)

8 Treelands Close
Cheltenham
Gloucestershire
GL53 0DF

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

8 Westbury Road
Cheltenham
Gloucestershire
GL53 9EW

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

80 Shurdington Road
Cheltenham
Gloucestershire
GL53 0JH

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

81 Moorend Road
Cheltenham
Gloucestershire
GL53 0HB

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

83 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0BS

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

83 Moorend Road
Cheltenham
Gloucestershire
GL53 0HB

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

85 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PF

Comments: 15th October 2013
I completely and utterly disagree to this proposed application. The community can not cope with a development of this sort on any level. There are not enough places at the local secondary and no plans to build a new one. My children would have no place to attend secondary school. The main issue is traffic and environmental pollution and air pollution levels. Church Road where I live at times exceeds permitted levels of pollution according to the EU. I would be happy to write to the EU if any proposed development went ahead as our roads cannot cope with increased levels of traffic. Church Road is heavily congested in the mornings, at school pick-up and at rush hour. It is almost impossible to cross the road at these times and very dangerous living here with young children. Wing mirrors are constantly being broken from cars by passing traffic because there is barely enough room to pass in certain places. Any increase in traffic on this road would cause total chaos, danger and be socially irresponsible. A child was knocked down on Church Road not long ago. Diverting the traffic to Shurdington Road would not work as it is also already congested, often back to the roundabout near Morrison's. There is NO ROOM for development here. The local infrastructure would collapse under the strain.

85 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PF

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

86 Century Court
Montpellier Grove
Cheltenham
Gloucestershire
GL50 2XR

Comments: 29th November 2013
Letter attached: BATCH 8 (25th - 29th November)

87 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PF

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

87 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0BS

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

87 Pilley Crescent
Cheltenham
Gloucestershire
GL53 9ES

Comments: 21st October 2013
We have serious concerns regarding this application for the following reasons;

The surrounding infrastructure cannot cope with anymore traffic , at busy times of the day Church Road and Shurdington Road are at a standstill, air pollution is high and it is very difficult for children to travel safely to local schools. Building houses on Kidnappers Lane would significantly increase traffic to the roads and create serious problems along Church Road and Shurdington Road. No proposals address this issue. There is no provision for additional secondary school places when both local schools are already under strain and have no plans to expand. This is green belt land used by people from all over Cheltenham not just Leckhampton and once concreted over cannot be regained.

Please bear in mind these comments when considering these plans.

89 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PF

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

89 Moorend Road
Cheltenham
Gloucestershire
GL53 0HB

Comments: 14th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

9 Canterbury Walk
Cheltenham
Gloucestershire
GL51 3HQ

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

9 Century Court
Montpellier Grove
Cheltenham
Gloucestershire
GL50 2XR

Comments: 22nd November 2013
Letter attached: BATCH 7 (18th - 22nd November)

9 Highwood Avenue
Cheltenham
Gloucestershire
GL53 0JJ

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

9 Hillary Road
Cheltenham
Gloucestershire
GL53 9LB

Comments: 27th December 2013
Letter attached: BATCH 11 (14th - 20th December)

9 Hobby Close
Cheltenham
Gloucestershire
GL53 0LP

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

9 Imperial Square
Cheltenham
Gloucestershire
GL50 1QB

Comments: 11th March 2014

I wish to register my opposition to the proposals from Curtin & Co (acting on behalf of Bovis and Miller Homes) for 650 new homes (plus additional facilities) on Leckhampton land between Shurdington Road, Church Road and Kidnappers Lane.

My concerns relate to the specific application (see below), but also to the way in which the Joint Core Strategy is now being used as a principal justification for developments of this kind. As you will know, the central driver for the Joint Core Strategy is the estimated need for a further 10,800 new homes between now and 2031, whereas the ONS has assessed the level of housing need at 6,070. There is a world of difference between these two estimates.

The proposal itself is so deeply flawed as to beggar belief, given the degree to which that number of new homes in that location will cause very significant knock-on problems, in the following respects:

[1] Congestion on the A46. I have seen the proposals to reduce congestion on the A46, and can hardly believe this is considered by the developers to be an adequate mitigation of the proposal. If the proposal to consent a further 1,500 homes in Brockworth is accepted, it would create a massive problem for all those who depend on the A46 as their principal artery in and out of Cheltenham.

[2] It's not just the congestion: it's all the emissions that all those additional vehicles will produce. As you will know, the EU is now intent on holding the UK much more rigorously to account for its continuing infractions against the EU's Air Quality Directive. This new development will make a bad situation in Cheltenham a great deal worse.

[3] It would appear that very little consideration has been given to the impact of this development on the provision of school places, not just (in the first instance) at Primary level, but at the Secondary level somewhat down the line. Surely there should be an agreed strategy for educational provision before any huge new housing developments of this kind are approved?

[4] On balance, it's hard to believe this proposal has been advanced in the spirit of the coalition government's Localism Act. As I understand it, there is now a proposal from the Leckhampton with Warden Hill Parish Council that the Leckhampton Fields should be protected as a Local Green Space of special community value.

In the spirit of true localism, I sincerely hope that this proposal from the Leckhampton and Warden Hill Parish Council will be given proper consideration before consideration of the housing proposal is allowed to proceed.

9 Liddington Close
Cheltenham
Gloucestershire
GL53 0AH

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

9 Nourse Close
Cheltenham
Gloucestershire
GL53 0NQ

Comments: 23rd October 2013
I'm writing to object wholeheartedly to the planning application 13/01605/OUT, and indeed to any application, which will destroy the natural open spaces in this locality that generations have enjoyed and which should be kept for future generations.

The flood risk in this area is already significant and occurs in parts where ground water rises from existing drains. The proposals will cause massive run-off and threaten both existing and new homes.

There are simply not enough secondary school places to cope with any more children. The local schools are already oversubscribed and local children already have to travel across town to other schools.

Shurdington Road, Church Road and Bath Road are already heavily congested at various times of the day and the estimated 1,000 extra cars (which will be used whatever public transport is available) at peak times of day will make the situation even more miserable and dangerous. Any slight traffic issue at the moment, such as temporary traffic lights or a minor accident, causes massive tailbacks. Traffic pollution on those roads is already above EU levels and Cheltenham has been made an Air Quality Management Area.

Overall, the application is premature and, as is obvious from the comments almost totally voicing strong objection, is not in the best interest of the residents.

The consideration of the application should be delayed until the Joint Core Strategy for the area of Cheltenham, Tewkesbury and Gloucester City has been finalised. Also, all aspects of planning, transport, environment and the population estimates contained in the housing targets should be verified first.

It really does seem ludicrous, in these austere times, that the Council is even considering this application before the essential data has been verified. This could be a huge waste of money.

The public must be reassured by hard facts that the JCS housing targets are objective, transparent and in accordance with the needs of the area and not simply a contrived Developer's Charter.

9 Nourse Close
Cheltenham
Gloucestershire
GL53 0NQ

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

9 Nourse Close
Cheltenham
Gloucestershire
GL53 0NQ

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

9 Pilford Road
Cheltenham
Gloucestershire
GL53 9AG

Comments: 23rd October 2013
Letter attached: BATCH 3 (21st - 25th October)

9 Pilford Road
Cheltenham
Gloucestershire
GL53 9AG

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

9 Rochester Close
Cheltenham
Gloucestershire
GL51 3DJ

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

9 Sir Charles Irving Close
Cheltenham
Gloucestershire
GL50 2DS

Comments: 30th October 2013
I wish to register my objection to the above planning application on the following grounds:

1. The proposed development will utilise green space which is valuable for recreation for myself and my family and is part of the reason why we chose to live in this part of the country.
2. There are many brownfield sites around Cheltenham which should be considered for development well before sites such as those at Kidnapper's Lane.
3. The stress which this development and the resulting increase in population/traffic will impose on existing resources and infrastructure, such as schools, roads, healthcare has not been adequately considered and these stresses will have a detrimental impact on the quality of life in this area.

In summary, this application is premature, and should not go before the Planning Committee until the Joint Core Strategy for the area of Cheltenham, Tewkesbury and Gloucester has been finalised. Also all aspects of planning, transport, environment and the population estimates contained in the housing targets need to be verified.

9 Southern Road
Cheltenham
Gloucestershire
GL53 9AW

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

9 Station Close
Cheltenham
Gloucestershire
GL53 0AB

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

90 Painswick Road
Cheltenham
Gloucestershire
GL50 2EY

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

92 Farmfield Road
Cheltenham
Gloucestershire
GL51 3RA

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

95 Pilley Crescent
Cheltenham
Gloucestershire
GL53 9ES

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

Appledore
75 Moorend Road
Cheltenham
Gloucestershire
GL53 0HB

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

April court
churchlane
badgeworth
Gl51 4ul

Comments: 16th October 2013
looking at the plans I do object to the proposed. The main reason why people want to live in the area is because of its country views and open spaces. This is slowly beginning to change with developments becoming a constant. After the recent 'Bloor Homes' development also in the area ,there seems to be an ever increasing evaporation of open land.
Traffic and congestion will also cause further frustration in the area as Shurdington road is an already congested route. Plans to ease congestion around the Cheltenham area need to be looked at before this plan should even be considered.

I don't wish to focus on the negative effect of the finished development as I feel that it has already been stated by many in previous comments. I would like to put the construction phase forward also as the additional problems this will cause to the area.

Bella Vista
14 Greatfield Drive
Cheltenham
Gloucestershire
GL53 9BU

Comments: 13th December 2013
Letter attached: BATCH 10 (9th - 13th December)

Berrynarbour
Leckhampton Hill
Cheltenham
Gloucestershire
GL53 9QG

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

Brizen Lodge
Farm Lane
Leckhampton
Cheltenham
Gloucestershire
GL53 0NN

Comments: 14th October 2013
I have reviewed the documents associated with the above planning application and in general I OBJECT to this proposal believing it to be premature, ill considered and unsympathetic to the existing environment. The existing infrastructure in the area of the development will not be able to cope with the extra demands being placed upon it by this development. My detailed comments are as follows:

Relationship to Joint Core Strategy
This application has been submitted in advance of the finalisation of the joint core strategy. This makes the job of the public more difficult, having to review two related proposals in parallel leading to the possibility that not all relevant views and opinions are properly presented and

considered at the appropriate time. The advantage to the developer is that should this application and the JCS work in their favour they will be able to make some profit sooner, but clearly at the expense of the public for the above noted reason. It would be my preference for this application to be put on hold until the JCS has been finalised. Can you confirm that all the analysis of the impact (traffic, education, pollution, environment etc.) of this development takes into account all other proposed developments in the area such as the proposed Brizen Farm development, the development at the south east end of kidnappers lane and the proposed development within the triangle of land between Up Hatherley Way and Chargrove Lane?

Impact on existing housing stock

I can appreciate the developers have tried to be sympathetic to the existing housing stock by placing the lower density/lower height properties at the perimeter of the development. Even so this development will drastically change the character of the approach to the existing houses on Kidnappers Lane and Farm Lane. Firstly, where there are lower density houses to be built off Kidnappers Lane near the A46 we will end up with new properties on the North side of the road and the existing bungalows on the South side. The new properties are described as lower density ie 25 to 33 dwellings per hectare, however this is not low density at all when compared to the existing houses which are approximately 10 dwellings per hectare. The new properties will also be 2 storeys as opposed to the existing single storey bungalows. Therefore the character of this part of the road will go from a semi rural aspect to a complete imbalance in property type and density. Secondly, the approach onto Kidnappers lane is being relocated Northward at the location of a new entrance to the site. This will mean that those wishing to access properties on Kidnappers Lane and Farm Lane, will effectively have to drive through a new housing estate development to get to their properties. Making those properties (including mine) feel like they are part of the backend of a new estate as opposed to the semi rural approach that is currently enjoyed. It is for these two reasons that I feel the proposed development is unsympathetic to the existing housing stock and will completely change the character of the area. I am also concerned that because the design of the internal road layout is potentially subject to change the travel distance through the new estate from the A46 to Kidnappers Lane and Farm Lane could lengthen even further, making the existing properties feel like they are even further back in the depths of an uncharacteristic new development. All of this could seriously effect the value of the existing properties.

Phasing and Timing

I note from one of the documents the developers expect it to take 8 years to complete the development. The appears to me to be an extraordinary length of time but leaves me concerned that something, like a change in market conditions, could occur in that time frame such that we end up with a partially complete development that does not get finished for many more years. What guarantees do we as existing residents have that the developers will be committed to finishing individual phases or the entire development. Or that the individual phases do work as standalone development that would comply with the NPPF. To have a half finished development on the door step will effect the value of the existing properties as would the constant disruption caused by the continuous construction work over such an extended time frame. Also, are the road closures identified on the plan justified by the existence of this application alone or are they required as part of the wider development? At what point of the development would this road closure be put into force?

Traffic

As noted above it is not clear to me whether or not the transport assessment takes into account all other planned developments in the area. Sections 1.2.3 of the Transport Assessment states that discussions are ongoing with the County Council and the Highways Agency are ongoing and these discussions will result in a change to the Transport Assessment. This is further evidence that suggest this application is premature. The Transport Assessment also makes reference to the junction of Shurdington Rd and Leckhampton Lane. The reports descriptions of this junction do not align with my own experiences of this road during the evening rush hour. I travel home from work northwards on the A46 from the A417 to Kidnappers lane and most evenings around 6

pm the A46 is stop start traffic all the way from the A417 roundabout to the junction with Leckhampton Lane, a distance of approximately 2.6km. I cannot see how this development and the other planned developments in the area wouldnt further exacerbate this unacceptable situation. All this extra traffic is going to further reduce the air quality in the area. The drive to support minimisation of the use of car journeys by residents and non-residents into and out of the estate is laudable but unlikely to yield the benefits identified in the travel plans. In particular the use of cycles would not greatly increase as there are no cycle ways to Cheltenham or local centres that dont involve sharing roads with cars etc.

Other Concerns
The residents of the properties in-between the road closures on Kidnappers Lane will have to drive through the new housing estate to access their properties. I have driven around many new housing estates and given there is generally insufficient car parking for the new properties, the residents will park along all the main estate roads potentially making it very difficult for emergency vehicles to access the properties within and beyond. If I lived in-between the road closures on Kidnappers Lane I think I would feel a little vulnerable. I dont believe that there are sufficient secondary school places within the area. The construction of this development will only put more pressure on an already strained secondary school system. A lot of the graphics in the Design and Access Statement are not readable. I appreciate they may be copies of graphics from other supplied documents, but it shouldnt be the commenters responsibility to find them. Please provide a Design and Access Statement that is of a professional standard.

Brizen Lodge
Farm Lane
Leckhampton
Cheltenham
Gloucestershire
GL53 0NN

Comments: 17th October 2013
I have reviewed the numerous documents associated with the above planning application and in general I OBJECT to this proposal believing it to be premature, ill considered and unsympathetic to the existing environment. The existing infrastructure in the area of the development will not be able to cope with the extra demands being placed upon it by this development. My detailed comments are as follows:

Relationship to Joint Core Strategy

This application has been submitted in advance of the finalisation of the joint core strategy. This makes the job of the public more difficult, having to review two related proposals in parallel leading to the possibility that not all relevant views and opinions are properly presented and considered at the appropriate time. The advantage to the developer is that should this application and the JCS work in their favour they will be able to make some profit sooner, but clearly at the expense of the public for the above noted reason. It would be my preference for this application to be put on hold until the JCS has been finalised.

It is not apparent to me that all the analysis of the impact (traffic, education, pollution, environment etc.) of this development takes into account all other proposed developments in the area such as the proposed Brizen Farm development, the development at the south east end of kidnappers lane and the proposed development within the triangle of land between Up Hatherley Way and Chargrove Lane. This seems to be a salami slicing exercise on the developers part in order to ensure each part of the development will be looked at more favourably by planners. Can you confirm this will not be the case?

I would also like some assurance that the planning decisions will be independent of the government subsidies available to councils for every new house that is built. If this is not the case then effectively there is no independence to this process and it is in the councils interest to build regardless of public opinion.

Privacy

This development will mean there will be houses across the road from me where currently there are none and I am concerned about my privacy. Particularly as some of these will be 2.5 and 3 storey houses meaning they may be able to see into my house from theirs.

Impact on existing housing stock

This development will drastically change the character of the approach to the existing houses on Kidnappers Lane and Farm Lane.

Firstly, where there are lower density houses to be built off Kidnappers Lane near the A46 we will end up with new properties on the North side of the road and the existing bungalows on the South side. The new properties are described as lower density i.e. 25 to 33 dwellings per hectare, however this is not low density at all when compared to the existing houses which are approximately 10 dwellings per hectare. The new properties will also be 2 storeys as opposed to the existing single storey bungalows. Therefore the character of this part of the road will go from a semi rural aspect to a complete imbalance in property type and density. There are also likely to be 3 storey houses behind these, giving an even more cramped appearance. Considering there are currently no 2.5 or 3 storey houses in the area this will be a drastic change to the feel of this part of Leckhampton.

Secondly, the approach onto Kidnappers lane is being relocated Northward at the location of a new entrance to the site. This will mean that those wishing to access properties on Kidnappers Lane and Farm Lane, will effectively have to drive through a new housing estate development to get to their properties. Making those properties (including mine) feel like they are part of the back end of a new estate as opposed to the semi rural approach that is currently enjoyed.

It is for these reasons that I feel the proposed development is unsympathetic to the existing housing stock and will completely change the character of the area.

I am also concerned that because the design of the internal road layout is potentially subject to change the travel distance through the new estate from the A46 to Kidnappers Lane and Farm Lane could lengthen even further, making the existing properties feel like they are even further back in the depths of an uncharacteristic new development. All of this could seriously effect the value of the existing properties. I moved to this part of Leckhampton from a development such as the one proposed in order the enjoy the space and low density buildings. This would ruin that for me.

Noise and Disturbance

I note from one of the documents the developers expect it to take 8 years to complete the development. The appears to me to be an extraordinary length of time but leaves me concerned that something, like a change in market conditions, could occur in that time frame such that we end up with a partially complete development that does not get finished for many more years. What guarantees do we as existing residents have that the developers will be committed to finishing individual phases or the entire development. Or that the individual phases do work as standalone development that would comply with the NPPF. To have a half finished development on the door step will effect not only the value of the existing properties as would the constant disruption caused by the continuous construction work over such an extended time frame, but would also encourage crime into the area.

Are the road closures identified on the plan justified by the existence of this application alone or are they required as part of the wider development? At what point of the development would this road closure be put into force? I can currently drive to Nursery Rhymes childcare facility in no time at all and am concerned these road closures may mean having to drive all the way out onto the A46 for what should be a two minute journey.

Traffic and pollution/air quality

It is not clear to me whether or not the transport assessment takes into account all other planned developments in the area.

Sections 1.2.3 of the Transport Assessment states that discussions are ongoing with the County Council and the Highways Agency are ongoing and these discussions will result in a change to the Transport Assessment. This is further evidence that suggest this application is premature.

The Transport Assessment also makes reference to the junction of Shurdington Rd and Leckhampton Lane. The reports descriptions of this junction do not align with my own experiences of this road during the evening rush hour. I know the road northwards on the A46 from the A417 to Kidnappers lane most evenings around 6 pm is stop start traffic all the way from the A417 roundabout to the junction with Leckhampton Lane, a distance of approximately 2.6km. There is also stop start traffic often from the Morrisons main roundabout to Bath Road. I cannot see how this development and the other planned developments in the area wouldn't further exacerbate this unacceptable situation. This development alone would see an additional 1300 cars on the road assuming 2 cars per household. Although planning assumptions may use 1.4 cars per household, this would be for mixed average usage. However, this development is marketed towards families where 2 to 3 car households are not uncommon.

I walk to work every morning and find the current level of pollution and air quality along the A46 is pretty poor. Indeed the last few surveys of air quality undertaken in this area would all agree with me. In fact the levels of acceptable air quality is already twice that recommended by WHO and the levels measured along this rad are higher. All this extra traffic is going to further reduce the air quality in the area.

This development seems to imply it would try to be environmently friendly by encouraging bus and cycle use. However, the use of cycles would not greatly increase as there is no cycle way along the A46 and this is a particularly hazardous road with large vehicles and often fast traffic. This is likely to encourage cyclists onto the pavement which is mainly single file and would make it more hazardous for pedestrians such as myself. There are no cycle ways to Cheltenham or local centres that don't involve sharing roads with cars etc. I see there are no plans to improve or widen the A46 with cycle paths or extra lanes so do not believe the traffic plans have been properly thought out.

Other Concerns

The residents of the properties in-between the road closures on Kidnappers Lane will have to drive through the new housing estate to access their properties. I have driven around many new housing estates and given there is generally insufficient car parking for the new properties, the residents will park along all the main estate roads potentially making it very difficult for emergency vehicles to access the properties within and beyond. If I lived in-between the road closures on Kidnappers Lane I think I would feel a little vulnerable. I also believe that these new residents will park along both Kidnappers lane and Farm Lane again changing the character of the area and making it more hazardous to cross the road as there will be more cars than parking spaces in the development. It is also well know that people rarely park in garages so even where these have been provided, they should not be counted as a parking space. There is also no mention of visitors car parking spaces in the development.

Although a primary school is likely to be built as part of this development I don't believe that there are sufficient secondary school places within the area and neither of the current schools have expansion plans. The construction of this development will only put more pressure on an already strained secondary school system. There are also not enough jobs in Cheltenham to sustain such an influx of people. We already know much of the people that will move into this development will be migrating from outside of Cheltenham. This will mean they need jobs, healthcare and infrastructure to support them that Cheltenham simply does not have. The hospital has recently closed its A&E department for evenings and weekends, the maternity unit is now only midwife led and there is already a shortage of NHS doctorrs and dentists in the area.

A lot of the graphics in the Design and Access Statement are not readable. I appreciate they may be copies of graphics from other supplied documents, but it shouldn't be the commenter's responsibility to find them. Please provide a Design and Access Statement that is of a professional standard.

There are a number of documents submitted as part of this application, many without clear executive summaries and conclusions. I feel insufficient time has been given to review these.

I look forward to hearing from the planning department resolving the issues identified above.

Broadclyst
Church Road
Leckhampton
Cheltenham
GL53 0QJ

Comments: 1st November 2013
I am writing to express my objections to the above outline planning application on a number of grounds: The application is premature, when the JCS is out for discussion; Four planning inspectors have previously stated that the area on the Leckhampton/Shurdington border cannot accommodate any large-scale developments; Traffic along the Shurdington Road is already nose-to-tail most mornings and evenings, so the extra 650 dwellings, with their associated vehicles, would exacerbate an already intolerable state of affairs; Church Road is struggling to cope with existing traffic levels; every morning sees near accidents and very frayed tempers amongst drivers; The area may not be in the Green Belt or AONB but it is a fantastic spot for wildlife, with a huge range of species; The area is also used as a leisure facility by large numbers of people, not just those living immediately adjacent to the site; The land is used for food production purposes, both in Lott Meadow and the smallholdings; with the threat of development lifted and longer leases it could be even more productive.

To summarise, I believe that the proposed development would result in a poor quality of life for the new residents and those who already live in the south of Cheltenham.

Brook Cottage
Crippetts Lane
Leckhampton
Chetlenham
GL51 4XT

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Brookfields
111A Charlton Lane
Cheltenham
Gloucestershire
GL53 9EE

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Brynhyfryd
Farm Lane
Leckhampton
Cheltenham
Gloucestershire
GL53 0NN

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

Byways
Church Road
Cheltenham
GL53 0QJ

Comments: 21st October 2013
I am writing to object most strongly to the above application on grounds of the huge impact on Leckhampton and its adjacent communities. There are many issues, but I will only detail what I see as the three most important here.

Traffic. The peak hour traffic in this area is a misery. Leckhampton Lane and Church Road already form part of 'the Cheltenham South Circular'. I live on Church Road and know for a fact that the daily number of vehicles rose by 30% when the Brockworth bypass opened. Did the traffic modelling predict this? The proposed closure of Kidnappers Lane will make no difference to solving the problem; it will probably make matters worse. Traffic onto A46 will be increased at the busiest times as commuting and school run vehicles from this development are added. And cars are getting larger! When Church Road was widened from a country lane in the late 1950's, an adequate road width was based on the dimensions of the Ford Anglia and hardly anyone parked a car on the road. Today cars at the urban end of Church Road are half parked on the pavement, and even then moving traffic struggles to pass. With all this comes issues of personal safety and air pollution. The whole experience is horrible for cyclists and for parents who do walk their children to school.

Landscape. In 2003 a report was commissioned entitled 'Land at Farm Lane / Church Road Leckhampton, Cheltenham - Landscape and Visual Appraisal'. The report concluded that the landscape value at Leckhampton was extremely important, as it complements and enhances the setting and natural beauty of the AONB (generally acknowledged to be one of England's finest) and it should not be subject to large scale development. Areas nearby are considered precious enough to be included in greenbelt, with the crucial function of preventing urban sprawl and coalescence between Cheltenham and Gloucester. Furthermore, the land is much valued as wildlife habitat and by humans for recreation.

Joint Core Strategy. This location has been identified in the draft JCS as a strategic site and is shown as such on the map recently published in the Echo. The application is therefore premature and should not go before the planning committee until the JCS has been finalised. Consultation has only just begun on this: population estimates, environmental and flooding assessments are

not completed; and the traffic modelling will not be available until January 2014, which, frankly, is a travesty. This is a prime example of developers trying to get in 'under the wire' and is not to be tolerated. What is at stake is of the utmost importance and is the reason local people have fought against inappropriate and unsustainable development for so long.

Byways
Church Road
Leckhampton
Cheltenham
GL53 0QJ

Comments: 21st October 2013
I am writing to express my shock and utter disbelief on seeing the extent of the proposed development. I am sure other members of the community do not realise the sheer scale of this proposal and, if they do, you will be inundated with letters of criticism. EIGHTY acres of development will affect everyone adversely.

I have no objection at all to the building of new and appropriate much needed housing but not if it is in the wrong place. As you are well aware houses in the wrong place blight people's lives as long as they live there. In what way blighted - you may well ask. Traffic is the blight I and others often refer to.

It is a known fact that Shurdington Road is already having to handle more traffic than it can cope with. Static traffic on numerous occasions throughout the working week not only adds to the stresses of modern life but also adds to the wastefulness of our society spewing all sorts of particulates into the atmosphere of Cheltenham. Frustration and impatience leads to accidents and these will surely increase.

The land in question has not been 'utilised' as best it could over the past few years because it has been in a type of 'limbo' where numerous builders have 'options' on development. Martin Horwood (MP) has suggested that much of the land to the south of Shurdington Road be designated as Country Park. Taking this option would finalise the status of this land thereby saving much wasted time haggling over its future. The Victorians were generous enough to create many areas of parkland for public use, realising that quality of life was as important as money. Have our values really been changed so radically by the pursuit of the fast buck

The JCS seems to suggest the need for 32,000 homes at a time when the county's population is flatlining. Amazing! If true squeezing one thousand homes in here and another one thousand homes there merely detracts from the quality of thirty two different places. That does not seem to be very clever. THIRTY TWO THOUSAND NEW HOMES SUGGESTS A NEW TOWN with roads designed to handle all of the traffic all of the time. We'd have a safer and much more pleasant environment for all certainly.

Byways
Church Road
Leckhampton
Cheltenham
GL53 0QJ

Comments: 21st October 2013
I am writing to object to the above application for the following reasons.

650 houses is going to create too much extra traffic on Shurdington Road, Church Road and down Bath Road. These roads are already at capacity in the rush hour. There will be more accidents.

It will destroy the lovely view looking up to Leckhampton Hill, and also the view from the top of the hill, which I regularly walk.

Light pollution will increase, air pollution will increase.

It will increase the risk of flooding by tar-macing over the fields.

There are no places at Bournside and Balcarras.

We will lose important wildlife habitat which is right on our doorstep.

We will lose open space for walking and recreation.

Cadogan
Leckhampton Lane
Shurdington
Cheltenham
GL51 4XW

Comments: 18th November 2013
I wish to object to the proposed development on the following grounds:

Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly and fully resolved.

The traffic congestion created by this development together with the other proposed developments south of Cheltenham would created horrendous traffic queues in peak periods. The planning application offers no solution to the serious traffic problems.

The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they were to work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

I am personally affected and deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

My family and I greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

This application is premature, and should not go before the Planning Committee until the Joint Core Strategy for the area of Cheltenham, Tewkesbury and Gloucester has been finalised. Also all aspects of planning, transport, environment and the population estimates contained in the housing targets have been verified.

Cadogan
Leckhampton Lane
Shurdington
Cheltenham
GL51 4XW

Comments: 18th November 2013
I wish to object to the proposed development on the following grounds:

Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly and fully resolved.

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This application is premature, and should not go before the Planning Committee until the Joint Core Strategy for the area of Cheltenham, Tewkesbury and Gloucester has been finalised. Also all aspects of planning, transport, environment and the population estimates contained in the housing targets have been verified.

Calves Close
Church Road
Leckhampton
Cheltenham
Gloucetershire
GL53 0QJ

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

Cameron
11 Gordon Road
Cheltenham
Gloucestershire
GL53 0ES

Comments: 16th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Chartwell
Shurdington Road
Cheltenham
Gloucestershire
GL51 4WJ

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

Cheltenham Liberal Democrats
16 Hewlett Road
Cheltenham
Gloucestershire
GL52 6AA

Comments: 23rd January 2014
Letter attached.

Clayfield
Farm Lane
Leckhampton
Cheltenham
Gloucestershire
GL53 0NN

Comments: 30th October 2013
The impact on traffic the area will be disastrous, the A46 is already a nightmare for anyone using in commuting hours. Clearly additional housing will impact this already overloaded route. There is no provision for additional Secondary schooling in the proposals. There ar precious few spaces for children on this side of Cheltenham, without the additional impact of extra families from additional housing.

The whole proposal seems ill thought out from an infrastructure point of view

Coniston
98A Shurdington Road
Cheltenham
Gloucestershire
GL53 0JH

Comments: 8th November 2013
Letter attached: BATCH 5 (4th - 8th November)

Crippetts Farm
Crippetts Lane
Leckhampton
Cheltenham
Gloucestershire
GL51 4XT
Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

East Barn House
3 Leckhampton Farm Court
Leckhampton
Cheltenham
Gloucestershire
GL51 3GS

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

East Barn House
3 Leckhampton Farm Court
Leckhampton
Cheltenham
Gloucestershire
GL51 3GS

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

Entran Ltd
12 Greenway Farm
Bath Road
Wick
Bristol
BS30 5RL

Comments: 24th October 2013
Letter attached: BATCH 4 (28th October – 1st November)
Commissioned by LEGLAG

Fairfield
11 The Lanes
Cheltenham
Gloucestershire
GL53 0PU

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

Fairleigh
Fairfield Road
Cheltenham
Gloucestershire
GL53 7PD

Comments: 16th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Fairways
62 Sandy Lane
Charlton Kings
Cheltenham
Gloucestershire
GL53 9DQ

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

First Floor Flat
162 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0DH

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

Flat 1
162 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0DH

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

Flat 1
St Kenelm House
Shurdington Road
Cheltenham
Gloucestershire
GL53 0JH

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

Flat 4
Delamere
Wellington Street
Cheltenham
Gloucestershire
GL50 1XY

Comments: 4th March 2014
I am writing with regards to the current planning application to build new homes in Leckhampton.

I have a very young family and am looking to buy our first family home using the governments help-to-buy or shared ownership schemes. I am finding that there is a distinct shortage of new housing choice in Cheltenham, which has been highlighted in your core strategy.

My wife and her family has lived in Cheltenham most of their lives and I moved to the area around five years ago. We love Cheltenham and are proud residents and would therefore like to continue to live in the area which we call home and not be priced out!

As lovers of the countryside we understand peoples concerns about loss of green field land, however the needs of humans sometimes needs be a higher priority. There are still loads of amazing areas in Gloucestershire to enjoy the countryside.

I am therefore writing to show my wholehearted support for the plans to build new homes in Leckhampton and for other new-build proposals such as Elms Park.

Flat 6
87 Shurdington Road
Cheltenham
Gloucestershire
GL53 0JQ

Comments: 30th October 2013
This application is premature, and should not go before the Planning Committee until the Joint Core Strategy for the area of Cheltenham, Tewkesbury and Gloucester has been finalised. Also all aspects of planning, transport, environment and the population estimates contained in the housing targets have been verified.

As residents of Shurdington Road we are very concerned about the negative impact the proposed developments will have on the traffic congestion in this area. The queues at the Shurdington Road and Moorend Park Road junction are already a problem. Traffic backs up as far as Kidnappers Lane at peak times and also round the Park.

I have already complained to the council about the lack of crossing priority given to pedestrians at the junction, which is used by a lot of adults and school children. Having lived here for over thirty years we have seen the traffic getting busier and busier and we dread to think just what effect the proposals will have if they succeed. The effects on Bath Road and the Park, the main routes in to town will be horrendous.

Foilfield House
Church Road
Leckhampton
Glos
GL53 0QT

Comments: 15th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Foxfield House
Church Road
Leckhampton
Glos
GL53 0QJ
Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

Foxgloves
Moorend Grove
Cheltenham
Gloucestershire
GL53 0EY

Comments: 22nd November 2013
Letter attached: BATCH 7 (18th - 22nd November)

Glenaray
Shurdington Road
Cheltenham
Gloucestershire
GL53 0NJ

Comments: 8th November 2013
Letter attached: Batch 5 (4th - 8th November)

Gorran Haven
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NX

Comments: 16th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Comments: 28th October 2013
I am writing to suggest that this application is premature and is being hurried through before all the v relevant information has been obtained, particularly with respect to traffic on Church Road and Kidnappers lane which are already causing huge and dangerous problems on a daily basis. There also needs to be more info on population projections, secondary school available places, the recreational use of the green fields in this area. Nothing should be rushed through until the joint core strategy of Cheltenham, Gloucester and Tewkesbury has been finalised. Once too many houses have been built the problems they will cause can not be undone so please let common sense prevail.

Green Acres
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NP

Comments: 13th December 2013
Letter attached: BATCH 10 (9th - 13th December)

Lufton and Associates
Chartered Planning Consultancy
4 Beechcroft Avenue
Stafford
ST16 1BJ

Comments: 28th October 2013
Letter attached.
Commissioned by LEGLAG

Greenacres
1 Crippetts Road
Leckhampton
Gloucestershire
GL51 4XT

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

Greenacres
1 Crippetts Road
Leckhampton
Gloucestershire
GL51 4XT

Comments: 28th October 2013
EXPLANATORY NOTE
I object to this application for the following reasons, which I will briefly outline below and am submitting today to meet the official "deadline" for comments on this application.

However, there has been insufficient time for me to read and consider the many documents that have only been made public in the last few weeks (since the application was made). For instance, the important AMEC report analysing the potential capacity and pros and cons of various possible "strategic urban extensions" has, as far as I am aware, only appeared on the evidence base very recently, despite having been prepared over a year ago! Therefore I reserve the right to amplify my outline objections in the next few weeks, on the understanding that the Cheltenham Planning Department will continue to consider my objections up to a reasonable time before the application goes to Planning Committee, even after the formal deadline today.

OBJECTION. I Object to this Application for the following ten reasons:

It is contrary to the existing Local Plan. The emerging Joint Structure Plan is still capable of being considerably modified in the light of the public consultation, and is indeed quite likely to be modified so as to exclude this development. Therefore granting Planning Permission at this time might well prejudice or make impossible the best choice for the final approved structure plan. Therefore this application is premature in relation to the Joint Core Strategy.

This proposal is not part of a comprehensive plan for the area, as had been suggested in the RSS process which has now - in a sense - become the JCS process. Thus it does not conform to the aims of the Joint Core Strategy.

This development is not needed at present to make up the small apparent shortfall in Cheltenham's five year land bank.

The development will cause considerable damage to the outstanding views across the Severn Plain from several well-known viewpoints in the Cotswold Area of Outstanding Natural Beauty.

The development will inevitably give rise to severe traffic congestion, delays, and air pollution along the A46, especially at the morning peak hour. No workable remedial measures seem feasible.

The area under development contributes to an important and attractive open space, very accessible to everyone, including children and old people, and providing for a wide variety of recreational uses by the adjacent and nearby urban population. The loss of even part of this open space should be avoided, especially as Cheltenham already has less than the recommended amount of open space. In the longer perspective, the preservation of large open spaces within or adjacent to expanding urban areas is - or at least should be - an important planning objective. Large cities like London managed to do this in the past, and the prospective Cheltenham/Gloucester/Tewkesbury conurbation should do the same!

The development will entail the loss of a considerable amount of good quality agricultural land (grade 3a and better). A degree of food self-sufficiency is -or at least should be - an important national objective in a future world where food shortages seem very likely, and so unnecessary loss of good agricultural land should be avoided.

The local Parish Council has put forward a proposal for a "Local Green Space" in the same area, in accordance with the "Localism Act". Therefore no planning permission should be granted until the merits of this proposal have been considered by the District Council.

The proposed development is likely to cause flooding risks downstream, which cannot be reliably mitigated by the proposed SUDS measures, because of the uncertainty that the local authority will be able to afford to undertake the necessary maintenance in an adequate manner. (think potholes!).

This concludes my preliminary objection statement.

Hazelwell
Undercliff Terrace
Cheltenham
Gloucestershire
GL53 9AE

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

Holly Lodge
Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PS

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

Kersey The Rear Bungalow
48 Shurdington Road
Cheltenham
Gloucestershire
GL53 0JE

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

Keswick
66 Moorend Park Road
Cheltenham
Gloucestershire
GL53 0JY

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

Lambertsweg 1
54617 Sevenig/Our
Germany

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

Lantern Lodge
Farm Lane
Leckhampton
Cheltenham
Gloucestershire
GL53 0NN

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Linden Lodge
265 Old Bath Road
Cheltenham
Gloucestershire
GL53 9EF

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

Little Gables
Well Place
Cheltenham
Gloucestershire
GL50 2PJ

Comments: 21st July 2014
I learned recently about a proposal to develop a large site in south cheltenham …. I comment as follows:

I am fundamentally opposed to any further development of any open land lying to the south east of Shurdington road …..all the way to the A417. The reasons for this are two fold.

1. The open land provides a useful amenity and links the town with the surrounding hills.

2. The fertility of land lying below the foothills of the cotswolds is typically high as is evidenced by the number of horticultural establishments in the area. …in fact I can think of several places I have visited around the world where land in similar locations is highly fertile if on a rather grander scale (foothills of the Tien Shan mountains in Kazakhstan or the Himalayas in India).

Sadly I have also seen areas where beautifully fertile land has been totally destroyed by construction (Ashton Moss in Greater Manchester disappeared under a motorway).

Whilst I do understand that there is a housing shortage there are ample opportunities to redevelop parts of Cheltenham that have already been urbanised and we do not need to irreversibly spoil this open and fertile land.

Long Acre
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NR

Comments: 27th December 2013
Letter attached: BATCH 11 (14th - 20th December)

Long Acre
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NR

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

Long Acre
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NR

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

Longney
10 Gordon Road
Cheltenham
Gloucestershire
GL53 0ES

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

Maplehurst
Sandy Lane Road
Cheltenham
Gloucestershire
GL53 9DE

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

Marlboro
Shurdington Road
Cheltenham
Gloucestershire
GL53 0NJ

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

Medley Green Farm
Crippetts Lane
Leckhampton
Gloucestershire
GL51 4XT

Comments: 23rd October 2013
Letter attached: BATCH 3 (21st - 25th October)

Melrose
6 The Park
Cheltenham
Gloucestershire

Comments: 15th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Middlemoor
6 Hall Road
Cheltenham
Gloucestershire
GL53 0HE

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

Minchenden
24C Moorend Road
Cheltenham
Gloucestershire
GL53 0HD

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Mirambeau
7 Peregrine Road
Cheltenham
Gloucestershire
GL53 0LW

Comments: 6th December 2013
Letter attached: BATCH 9 (2nd - 6th December)

Mirambeau
Peregrine Road
Cheltenham

Comments: 5th November 2013
I am writing to express my concern about the subject planning application. This application is premature, and should not go before the Planning Committee until the Joint Core Strategy for the area of Cheltenham, Tewkesbury and Gloucester has been finalised. Also all aspects of planning, transport, environment and the population estimates contained in the housing targets should be verified first.

I am strongly opposed to any development in the Leckhampton green spaces as it will severly impact the quality of life not only for the local residents, but everyone in Cheltenham. These green spaces are important to the natural beauty of the area, providing homes for wildlife, walking and hiking opportunities for people, play space for children, floodplain area for rainwater, and peace and quiet for us and for future generations. The roads in the area, especially Shurdington Road, are already crowded at 8am and 5pm, air quiality is concerning, and primary schools are overcrowded. Additional development in this area could only be detrimental. I urge the council not to allow developers' greed to win over what is right and good.

Moat Cottage
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NR

Comments: 5th November 2013
I live at Moat Cottage Kidnappers Lane. I have not had any direct communication from you regarding this planning application. I believe that you should have provided such communication.

Besides the lack of communication, I object on the grounds of traffic and road capacity. Kidnappers lane has no pedestrian path and is not wide enough for two cars. The current plan would mean a lot of estate traffic on this road and the planned infrastructure could not safely deal with the volume.

Myrtle Cottage
Croft Street
Cheltenham
Gloucestershire
GL53 0EE

Comments: 18th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

Nambour
Farm Lane
Leckhampton
Cheltenham
Gloucestershire
GL53 0NN

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

Nowhere
61 Painswick Road
Cheltenham
Gloucestershire
GL50 2EP

Comments: 23rd October 2013
Letter attached: BATCH 3 (21st - 25th October)

Old Meadow House
Crippetts Lane
Gloucestershire
GL51 4XT

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

Orchard House
338 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AF

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

Orchard House
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NL

Comments: 8th November 2013
Letter attached: BATCH 5 (4th - 8th November)

Orchard View
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NL

Comments: 30th October 2013
I am writing to express my concern at the Outline Planning Application under Reference for up to 600 buildings on Kidnappers Lane and the adjacent smallholdings. I do not understand how such an application can be considered at all before the Joint Core Strategy for cheltenham, Gloucester and Tewkesbury has been finalised. It should also await the verification of the population estimates in the housing targets and the resolution of all aspects of the transport, environment and planning details.

The site is an area where development was expressly to be avoided to prevent Gloucester and Cheltenham merging around the A 46.

Development in the area proposed would significantly increase traffic congestion on roads which are already overcrowded, especially at peak times. As a resident who uses the A 46, I already experience long delays when trying to come out of Kidnappers Lane onto the A 46 at busy times and suffer traffic noise from the increasing numbers of drivers who use Kidnappers Lane as a shortcut.

The site proposed for development is not close to schools, shops, dOctoberors, employment opportunities or leisure facilities. This would therefore exacerbate further the traffic problems already mentioned.

Development in this area would damage the special landscape in an area of outstanding natural beauty and adversely affect the views to and from the Cotswold escarpment. Just as we have enjoyed it, so it should be preserved for future generations and not despoiled for short term gain and to meet targets which are now thought to be based on faulty predictions.

I object to the proposals themselves, but I also object to the possibility of the application being considered before the necessary machinery and information is in place against which it could be fairly judged

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

Orotava Brook Court
49 The Park
Cheltenham
Gloucestershire
GL50 2SB

Comments: 11th October 2013
Letter attached: BATCH 1 (3rd - 11th October)

Ragstones
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NT

Comments: 14th October 2013
My key objections to this major planning application is that it should not be considered prior to any joint core strategy for the area being agreed and all the transport and environmental implications have been confirmed. This development will have a massive impact on the local area so for it to be even considered prior to the bigger picture being verified is madness.

There seems to be no consideration as to senior school places - Bournside and Balcarras have no plans to extend so where will local children be sent? They cannot be pushed to Pitville and have to walk and take 2 buses to school. We live on the corner of Church Rd and Kidnappers Lane and the traffic on both roads is already bad and in rush our Church Road is near standstill and a danger to local school children. In addition the green spaces in Kidnappers Lane are a delight and allow us to keep our children in touch with nature and their environment. There must be somewhere more appropriate to build than here.

Ragstones
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NT

Comments: 15th October 2013
I wish to STRONGLY OBJECT to the above planning application for 650 houses off Kidnappers Lane in Leckhampton for the following reasons:

The application is premature and not in the best interest of the residents. The application should not be considered before the Joint Core Strategy for the area of Cheltenham, Tewkesbury and Gloucester City has been finalised. Also it is bad practice to proceed on information/data

(transport, environment, population estimates) before the data has been verified, and potentially wasteful, given the lack of resources available Im surprised the Council would consider making decisions when all of the information is not present and potentially wasting vast sums of money.

Cheltenham is already incredibly car focused; as a cyclist the roads are already dangerously busy. I find it extraordinary that a small town with such poor air quality (which breaks EU levels in winter months) does not encourage greener modes of transport (cycling/public transport) but is intent on increasing car numbers. Shurdington Road and therefore Church Road are both very very busy roads during rush periods with a constant traffic flow outside of rush periods and further housing and reliance on cars will further deplete the air quality and increase congestion. Cars often turn onto Kidnappers Lane from Church Rd and excessively accelerate (possibly due to the frustration the driver has just experienced on church road and see a clear road and therefore accelerate) creating unnecessary danger to pedestrians, (a child was recently knocked over on Church Road) and creating noise and air pollution. I live on the corner of Kidnappers Lane and Church Road and I have nearly been hit whilst edging out of my drive by cars going to fast to stop.

Extra traffic will congest the roads further, especially as this is a residential area and not an area of employment, therefore people will be travelling during already busy times. If further housing is required why is it not closer to better access points and areas of employment (the railway station, the M5 north and south).

Secondary school places are already limited and Balcarras and Brounside are not increasing their intake therefore which close by established school will children of secondary school age go.

Removing further greenbelt will impact on the environment and wildlife. The impact on the environment could be pertinent given the areas propensity to flooding (removing natural water run offs and water protection). By removing footpaths and green spaces for people to explore the council are discourages walking (with obvious associated health risks).

Ranch House
2 Greatfield Drive
Cheltenham
Gloucestershire
GL53 9BU

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

Ranmoor
Kestrel Close
Cheltenham
Gloucestershire
GL53 0LQ

Comments: 21st October 2013
Letter attached: BATCH 3 (21st - 25th October)

Richmond House
59 The Park
Cheltenham
Gloucestershire
GL50 2SA

Comments: 16th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Robinswood Cottage
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NP

Comments: 17th October 2013
I strongly object to the planning proposal.

As one of the worst-affected properties I make no apology for stating my personal objections.

I currently live in an open, quiet location surrounded by green fields and have a views across to Leckhampton Hill. This is why I have lived here for more than 18 years. My house is one of a pair of semi-detached single-storey properties, the attached bungalow being the only other building nearby. There is no through traffic.

According to the master plan the single-lane track, which currently serves as vehicle entry to only these two properties, will become an access point for traffic and will join a road, shown on the plan as a secondary route, which will be built immediately to the side and front of my house. The proposed closure of part of Kidnappers Lane will mean that not only will the road carry traffic going to and from the new development but will also become a rat run from Church Road through to Shurdington Road. The road layout means that all these vehicles will not just be passing around my house but will be stopping at the junction right next to my house. This is of great concern to me as I will be subjected to a huge increase in traffic noise and pollution and light pollution from streetlighting. As this road will be carrying the heavy construction traffic for phase 2 of the development there is also the potential for vibration damage. It will have a massive and detrimental effect on my living environment and property value.

On the master plan my property will be surrounded by medium-density housing. This may be up to 2.5 storeys high which will block my view, significantly diminish the natural light entering my home, greatly increase noise levels and reduce my privacy. The field opposite my house is subject to winter flooding (as are other areas) . My house, which has never been affected by this, is lower than the level of this ground so once the houses are built where will the run-off go?

The property attached to mine is shown on the master plan as being included in the proposed area for development. The shared water supply and drainage facilities serving both houses will be affected by the development but I have heard nothing from the building companies to say how they will guarantee that the integrity of my home and essential utilities would be maintained.

a) The development will destroy a green amenity within walking distance for local people, rich in birds and other wildlife including slow-worms, hedgehogs and bats.

b) The whole unique character of the area, cherished by many local people, will be completely lost and will become just another urban development. This not waste land; historically this part of old Leckhampton has been productive land. With the popularity of locally sourced food and 'grow your own' it seems perverse to cover it in houses.

c) The traffic congestion and pollution problems in the area are well known. As far as I'm aware there are no new large employers moving into Cheltenham so the new development could become a commuter estate which will further increase traffic movements. If this sort of development is what Cheltenham needs it should be built closer to motorway links.

d) The phased building programme could mean residents being subjected to prolonged periods of noise and disruption which will be miserable and will also affect the saleability of properties.

e) The cycle route will carry cyclists to the A46 where they will join the main flow of traffic with no cycle lanes. I fail to see the point of this; it will not encourage people to choose bike over car.

f) As I understand it there are not enough secondary school places in Cheltenham. Building a primary school to serve the new houses will not solve the problem.

I think this application is should be rejected in its entirety.

Incidentally it would be interesting to know how the Council decided to whom the Neighbour letter would be sent as I did not receive one even though I live in Kidnappers Lane; so much for community engagement.

Robinswood
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NP

Comments: 6th February 2014
Letter attached: BATCH 12

Sheepshead Row
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NR

Comments: 1st October 2013
Objection to Planning Application Ref 13/01605/OUT

I object most strongly to the above application on grounds of highway safety and convenience of road users, on the effect of the development on the characteristic of the neighbourhood, on the loss of amenity, on the loss of visual amenity and on grounds of nature conservation.

As noted in point 3.3.2 of the Residential Travel Plan the Eastern Length of Kidnappers Lane is a country lane in character with verges but no footways. It is currently an exceptionally dangerous road to use as a pedestrian because along this eastern section the carriageway is barely wide enough for 2 way traffic and pedestrians need to share the carriageway at this point. It poses a significant problem for local school children requiring a safe route to school. This applies to pupils at Leckhampton Primary School and those travelling to Bournside Secondary School. I believe that the developers feel that the closure of Kidnappers Lane, near to southern most vehicle access point to the site, will restrict drivers currently using the lane as a cut through. However, should any of the residents of the development wish to travel by car to local existing shops on Leckhampton Road, Leckhampton Primary School, St Peters Church, Leckhampton Village Hall or to head to Leckhampton Hill and on up to Birdlip, or to drive towards Charlton Kings to use the A40 then they will wish and need to drive along this eastern section of Kidnappers Lane.

Point 3.4.1, of the same plan, notes that Footways on one or both sides are provided on the majority of roads in the local area. This does not however apply to the Eastern Length of Kidnappers Lane.

Point 3.2.7 notes that parking on Church Road restricts carriageway width so that two way traffic movement is impeded. I believe that this will increase with the traffic exiting the development as detailed above. Air quality, as a result of this congestion, is noticeably poor especially in damp weather. This is a primary pedestrian route for local school children.

Contrary to the information in 3.2.8 there is no crossing patrol controlling traffic on Church Road at any time of the day. It is extremely dangerous for adults and children to cross. A child has been hit by a car within the last 12 months and it is a scenario that could easily be repeated. Even under current traffic conditions the Leckhampton School Policy states that pupils cannot ride their bicycles due to traffic congestion on local roads; this will worsen should the development go ahead.

Convenience of road users - if this applies to existing road users, then as a resident of Kidnappers Lane, existing vehicle access along Kidnappers Lane allows convenient access to the A46 to drive towards local supermarkets, the library, and to travel across to the West of Cheltenham. The closure of Kidnappers Lane will incur a detour through the development; a less direct and therefore less convenient route.

Traffic on the Shurdington Road is already at a standstill heading into Cheltenham during the morning rush hours. With some residents from the new development wishing to join this, then the congestion will only increase. The delays are so severe that the planners have been forced to consider a priority exit route for buses leaving the development so that traffic lights will halt traffic on the main road to allow the bus to join. Without stopping the traffic flow the bus would not be able to stick to timetable. The halting of traffic on this heavily congested road will certainly only increase congestion. I understand that the planners have used traffic modelling tools to predict the impact of the traffic on local main roads. This assumes that a given route will reach a point of saturation whereby drivers will abandon their usual route as a result of delays and congestion and choose an alternative. Should current users follow these predictions then the problem is only going to shift to other local roads. An alternative route would cause great inconvenience to many road users and I am hard pressed to come up with viable alternatives for some journeys.

The development will completely change the characteristics of the neighbourhood. As noted in the Residential Travel Plan R3.3.2, the eastern length of Kidnappers Lane is a country lane in character and serves periodic detached properties (two are listed) and market gardens. This has been the case for most of Leckhampton's history and once it becomes host to a vehicle exit from the development this will change considerably.

Lotts Meadow is currently an open space widely used by all sections of the community. Its present state of rough grazing with coppicing and seasonal pond provides a wealth of great outdoor activities for all residents. It is especially valued by local families and is used after school as well as at weekends. It provides a rare opportunity to witness local wildlife and flora in a safe environment and is enjoyed by many throughout day light hours. Creating an informal kick about area and numerous NEAP & LEAP areas will change its wild characteristics for ever and deprive local families of enjoying the countryside in their midst. The installation of NEAP & LEAP areas will also contribute to the loss of the visual amenity and detract greatly from the wild beauty of this open space. Should grazing cease in Lotts Meadow, as it will certainly also have to in the area closer to Shurdington Road currently used as smallholdings, then the very important amenity enabling food to be reared locally will be lost.

Allotments are proposed for an area currently home to a family of foxes, roe deer and wild orchids. We have also observed a host of birdlife including buzzards and kestrels catching their prey, hedgehogs, stoat, shrew and badgers and bats just in this small area earmarked for allotments. These allotments will require car parking; again really detracting from the

characteristics of the local area and causing more journeys to be made along the eastern section of Kidnappers Lane.

It is on these planning grounds that I object to the development of this land.

Smalley
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NL

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

Spring Hill
Crippetts Lane
Cheltenham
Glos
GL51 4XU
Comments: 9th December 2013
Letter attached: BATCH 12

Spring Hill
Crippetts Lane
Cheltenham
Gloucestershire
GL51 4XU

Comments: 18th October 2013

1. I have only today received information from Cheltenham Borough Council about the Joint Core Strategy for Cheltenham, Gloucester and Tewkesbury. It apparently is only just now under public consultation for a draft to consider housing need and location, employment and lastly infrastructure for the next 30 years. This consultation ends on the 26th of November 2013 so it is premature to be proposing to build 650 homes off Kidnappers Lane when one does not know what the JCS will be.

2. The estimated 1,000 extra cars on the road from this development would cause gridlock. Already the Shurdington Road is jammed up into Cheltenham and beyond Kidnappers Lane every weekday. Any closure of the Farm Lane end onto Church Road would exacerbate that problem. Give us the transport/traffic modelling information for the County before this application can be considered.

3. Pollution levels already are high in the Church Road and Shurdington Road areas in the winter months. EU air pollution levels have been exceeded so Cheltenham is in an Air Quality Management Area. Explain how the pollution levels will go down with the estimated 1000 extra cars on the road from this development.

4. Flooding is an issue in this area.

5. There are few places for students at the local Secondary Schools in Cheltenham so this development will cause a lot of problems there too.

6. The population for the whole County is estimated to be an increase of 500 people a year according to the 2011 Census yet in the Core Strategy Plan it is identified that this number is

1500, an increase of 1000! Give us the true Office of National Statistics figure on population projections before this application can be considered.

7. Are there not brownfield sites and derelict buildings to build housing on/in before greenbelt?

8. Cheltenham has been losing jobs so what are all these people coming for work doing?

9. What about all the facilities (home helps, shops, community halls, gardens, doctors etc) which will be needed and the hospitals are already stretched. We are full up!

10. This area is in the Cotswold Escarpment so is an important place for wildlife and recreation and an asset to the community.

11. Give us the information on housing need from the Strategic Housing Market Assessment studies. Without this how can one possibly consider this application.

12. It is too early to consider this application without the needed information from all the studies in this County and completion of the Joint Core Strategy.

These are my views.

St Pauls Medical Centre
Swindon Road
Cheltenham
Gloucestershire
GL50 4BW

Comments: 21st November 2013
Letter attached: BATCH 7 (18th - 22nd November)

Suffolk House
166 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0AA

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

The Bungalow
26B Moorend Park Road
Cheltenham
Gloucestershire
GL53 0JY

Comments: 8th November 2013
Letter attached: Batch 5 (4th - 8th November)

The Cedars
Kenelm Drive
Cheltenham
Gloucestershire
GL53 0JR

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

The Coach House
Ryeford Road South
Kings Stanley
Gloucester

Comments: 28th October 2013
I am writing with my objection to this application. I believe it is premature and should not go before the planning committee until the Joint Core Strategy for the area of Tewkesbury, Cheltenham and Gloucester City has been finalised. Also, that all aspects of planning, transport, environment and the population estimates contained in the housing targets have been verified.

The Cottage On The Green
The Green
Badgeworth
Cheltenham
Gloucestershire
GL51 4UL

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

The Gables
Leckhampton Lnae
Shurdington
Cheltenham
Gloucestershire
GL51 4XW

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

The Gateways
Farm Lane
Leckhampton
Cheltenham
Gloucestershire
GL53 0NN

Comments: 1st November 2013
Letter attached: BATCH 4 (28th October - 1st November)

The Keep
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NL

Comments: 2nd October 2013
I wish to raise objections to the proposed development in Leckhampton under planning Reference 13/01605/OUT and wish to make the following comments.

I consider this vicinity to be an area of outstanding natural beauty, which also provides a picturesque entry to Cheltenham on the A46. Further development in this area would be disastrous. We should protect valuable countryside from land-grabs for inappropriate development in an area that should be protected as an Area Of Outstanding Beauty.

Building in Leckhampton will put a strain on local services; will add even more congestion and air pollution to our roads. The additional traffic brought about by this development would be intolerable. I view the traffic cues every day from my window and already have difficulty accessing the A46 from Kidnappers Lane and following congestion into the Bath Road.

Also, I have witnessed the drainage manhole covers blown off by the high pressure in heavy rainfall resulting in repair of the drainage manhole and re-tarmacing of the A46 outside my house. Being fearful of causing flooding to my property, I would suggest that the whole infrastructure in the area couldn't withstand this inappropriate development.

Notwithstanding my earlier comments I find the proposal of local amenities adjacent to existing low-density residential housing totally inconsiderate to existing residents.

This would provide the potential for all manner of nuisance including noise, vandalism parking and potential area for antisocial behaviour.

We already have ample provision of retail outlets in Salisbury Avenue, Morrisons, The Bath Road and more.

We already have doctors surgeries at Warden Hill Community Centre in Hubert Crescent and Moorend Park Road.

We already have dental practices in Leckampton Road and Grasmere Road.

Comments: 28th October 2013
I wish to raise objections to the proposed development in Leckhampton under planning Reference 13/01605/OUT and wish to make the following comments.

I consider this vicinity to be an area of outstanding natural beauty, which also provides a picturesque entry to Cheltenham on the A46. Further development in this area would be disastrous. We should protect valuable countryside from land-grabs for inappropriate development in an area that should be protected as an Area Of Outstanding Beauty.

Building in Leckhampton will put a strain on local services; will add even more congestion and air pollution to our roads. The additional traffic brought about by this development would be intolerable. I view the traffic cues every day from my window and already have difficulty accessing the A46 from Kidnappers Lane and following congestion into the Bath Road.

Also, I have witnessed the drainage manhole covers blown off by the high pressure in heavy rainfall resulting in repair of the drainage manhole and re-tarmacing of the A46 outside my house.

Being fearful of causing flooding to my property, I would suggest that the whole infrastructure in the area couldn't withstand this inappropriate development.

Notwithstanding my earlier comments I find the proposal of local amenities adjacent to existing low-density residential housing totally inconsiderate to existing residents.

This would provide the potential for all manner of nuisance including noise, vandalism parking and potential area for antisocial behaviour.

We already have ample provision of retail outlets in Salisbury Avenue, Morrisons, The Bath Road and more.

We already have doctors surgeries at Warden Hill Community Centre in Hubert Crescent and Moorend Park Road.

We already have dental practices in Leckampton Road and Grasmere Road.

The Littlecroft
Shurdington Road
Cheltenham
Gloucestershire
GL53 0NJ

Comments: 28th October 2013
Letter attached: in BATCH 4 (14th - 18th October)

The Moat
Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0QJ

Comments: 21st October 2013
I am writing to object to the above planning application in the Leckhampton, Kidnappers Lane area for some 650 houses plus commercial units, Surgery and school, care home and offices. This application should be turned down for several good reasons. All stated before, many times, but you appear to be doing nothing to take into account the locals views.

1. This is a premature application as the Joint Core Strategy has not been finalised. 2. This area has no infrastructure for so many houses. The road system alone cannot take any more traffic without further gridlock, especially at peak travel times. For this level of development, you would put over 1000 extra vehicles on the roads. 3.This would add to air pollution problems that already exceed EU levels around Church Rd and the A46. 4.Senior school places are already under pressure at Bournside and Balcarras. No mention of the answer to this in the plan. 5.It would ruin a green area, enjoyed by many for walking. Wildlife would certainly suffer. 6. There is no proof that I have seen, that this area needs all these houses. Where are the jobs? People will just commute in their cars.

Please refuse this application.

The Old Lodge
Church Road
Leckhampton Cheltenham
Gloucestershire
GL53 0QJ

Comments: 16th October 2013
I object to the proposed development on the grounds of the increase of traffic on roads that are already saturated.

The transport assessment is clearly flawed in many areas. One example of this is illustrated by ATTACHMENT 4 - 'Employment Trip Distribution' where no journeys are assumed to be made exiting to the South via the A417. By far the most convenient route with the current plan when heading South is to exit via Kidnappers Lane, Church Road and Leckhampton Road. The report states that the increase in traffic on Church Road will be negligible - this will clearly not be the case as it will be the main route on and off the development for traffic heading South. As the transport assessment assumes that there will be only a negligible increase in traffic it fails to address the issue of increased traffic in the Church Road area.

The traffic density during rush hour on Church Road is already very high because Church Road provides the only route around the South East side of Cheltenham and, via Kidnappers Lane, provides the only route around the south of Cheltenham to the A40 and Gloucester which avoids the build up of traffic on the Shurdington Road. Church Road is narrow. This causes an number of problems chiefly centred around high levels of congestion and pollution, coupled with the dense residential nature of Church Road to the East of Kidnappers Lane, the position of Leckhampton Primary School and the near complete absence of off road parking. Cars can pass in both directions but not easily and the traffic tends to flow in blocks, in one direction and then the other. There is serious danger to school children walking along the narrow pavements and crossing Church Road and Hall Road to Leckhampton Primary School, which is a large primary school with 420+ pupils. Therefore, it must be a key principle in considering any development in this area that the traffic on Church Road must not be increased. This has been stated by planning inspectors on several occasions. Just one of many examples is a 1998 appeal relating to the development of Church Farm (in the more rural part of Church Road), the Inspector recorded that the appellants in that case (whose team also included a highways expert) acknowledged that Church Road is operating beyond its physical and environmental capacity. The increase in traffic has been grounds for refusal of numerous planning applications relating to properties over the last 20 years.

Previous traffic reports relating to Church Road have stated that the Kidnappers Lane junction with Church Road is restricted to a width of 4 metres. Visibility from a point 4.5 metres back is about 67 metres to the north-east and about 15 metres to the south-west. The proposal contains no mention of this restricted visibility and like many of the problems with the proposed development, it is dismissed as something which can be sorted out after the development is complete.

The transport assessment states that there will be no increase in traffic on Shurdington Road outside what is already expected without the development as the housing targets for Cheltenham need to be met. This is clearly flawed logic as merely stating that the building of more houses is mandated so the roads will have to cope is not a sensible way to plan a safe and efficient transport system. The impact of each proposal would need to be assessed both in isolation and as part of an overall plan for the Cheltenham and Gloucester area. It is therefore essential that the JCS is produced before a development on this site is even considered. The proposed development will increase the traffic levels on Shurdington Road which, in 2003, had junctions assessed at running at 90-100% capacity and traffic density is widely understood to have increased since. Tailbacks on the A46 would then encourage some motorists to bypass the A46 by using the longer route into Cheltenham via Leckhampton Lane, Church Road and Leckhampton Road, thereby further increasing the traffic through Church Road.

There are many reasons why this proposal should not be granted planning permission but I believe that the increased traffic on local roads and specifically Church Road should alone be sufficient to justify rejection.

The Old Rectory
Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0QJ

Comments: 18th October 2013
I wish to strongly oppose the proposed development of land off kidnappers Lane for the following reasons;

1. Traffic conditions are already at a dangerous level. I use Church Road to take my children to school and they have to witness cars and drivers fighting for right of way in a threatening and abusive manner. This is all within a School Zone on the Church Road. Adding another possible 1000 cars to this chaos is incredibly niave before any traffic survey is completed.

2. Loss of amenity, after a stressful day we always have a walk in the fields. Walking around a housing estate will not have the same benefit. Dog walkers will lose there walks, local schools will lose their nature walks and so on. In terms of tourism; Cheltenham advertises wonderful green spaces for walks in the countryside. We can hardly advertise our housing estates as a wonderful rural asset.

3. The application is premature in 5 - 10 years time we will wonder why on earth this was allowed to go through, we will never regain this space. There is no evidence that we have a short fall of housing. The Strategic Housing Market Assessment has not been completed. According to a study carried out by The Halifax building society last year, 662,105 homes were unoccupied in the UK, this number increases by 12,000 on average each year. Is this figure taken into account when shortfalls are calculated.

4. I have 2 young children, who we are already having difficulties finding school places, swimming classes, Scout groups to join. This is not going to improve the situation, by moving a small town population into a parish the size of Leckhampton.

I hope you consider these objections. I have read local opinions in the Public comments, and as a local I agree it is madness. Unless you live in the area you cannot fully understand the impact on the environment. Without even mentioning the loss of important wildlife, the threat of 1000 extras vehicles on the road system is unfeasible.

The Orchards
15 The Park
Cheltenham
Gloucestershire
GL50 2SL

Comments: 15th November 2013
Letter attached: BATCH 6 (11th - 15th November)

Tre Mair
Leckhampton Lane
Shurdington
Gloucestershire
GL51 4XW

Comments: 23rd October 2013
I email regarding the application 13/01605/OUT for 650 houses to be built in the Kidnappers Lane area. My wife and I are most concerned that the infrastructure will not stand up to the inevitable increase in traffic along the A46 and tributary roads. Services are not suitable to cope; for example the re are insufficient secondary school places. We feel that the plan has not been looked at from the point of view of what is viable for the community and we urge a rethink on this crucial matter.

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

Treetops
Leckhampton Hill
Cheltenham
Gloucestershire
GL53 9QG

Comments: 22nd November 2013
Letter attached: BATCH 7 (18th - 22nd November)

Vaynor
102 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0BX

Comments: 7th November 2013
Letter attached: BATCH 5 (4th - 8th November)

West Barn House
Leckhampton Farm Court
Leckhampton
Cheltenham
Gloucestershire
GL51 3GS

Comments: 15th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Whitebeam Cottage
Leckhampton Lane
Shurdington
Gloucestershire
GL51 4XW

Comments: 20th November 2013
Letter attached: BATCH 7 (18th - 22nd November)

Willow Green
Leckhampton Lane
Shurdington
Cheltenham
Glos
GL51 4XW

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Willow Green
Leckhampton Lane
Shurdington
Chetlenham
Glos
GL51 4XW

Comments: 17th October 2013
Letter attached: BATCH 2 (14th - 18th October)

Wister
Hill House
Leckhampton Hill
Cheltenham
Gloucestershire
GL53 9QG

Comments: 13th November 2013
Letter attached: BATCH 6 (11th - 15th November)

Wyndways
104 Charlton Lane
Cheltenham
Gloucestershire
GL53 9EA

Comments: 28th November 2013
Letter attached: BATCH 8 (25th - 29th November)

9 Imperial Square
Cheltenham
GL50 1QB

Comments: 3rd March 2014
Letter attached: BATCH 12

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MARTIN HORWOOD MP*

16 Hewlett Road
Cheltenham GL52 6AA

Planning team
Cheltenham Borough Council
Municipal Offices
The Promenade
Cheltenham GL50 9SA

9 January 2014

13/01605/OUT residential development of up to 650 dwellings at Leckhampton

I would like to register my very strong objection to this outline planning application on a number of grounds:

1. The application is contrary to the existing, valid Cheltenham local plan.
2. The application attempts to pre-empt the current process of consultation and refinement of the emerging Joint Core Strategy, in which the inclusion of this land at Leckhampton is extremely contentious and to which there are many significant unresolved objections.
3. The application is contrary to the emerging Neighbourhood Plan as described in the concept drafted by Leckhampton with Warden Hill Parish Council
4. The application would pre-empt current applications for Local Green Space (LGS) status to be applied to this land during the plan-making process.
5. The site is not appropriate for development because of its rural character, agricultural value and proximity to the Cotswolds Area of Outstanding Natural Beauty and has been repeatedly rejected for development by inspectors on these grounds
6. The application is therefore in breach of the National Planning Policy Framework (NPPF)

1. The application is contrary to the existing, valid Cheltenham Local Plan

The **Cheltenham Local Plan (2nd review 2006)** is still valid and is relevant to all current planning decisions. This was reinforced at planning appeal as recently as September last year (Appeal Ref: APP/B1605/A/13/2199178).

The **National Planning Policy Framework** is absolutely clear that it aims to 'strengthen local decision making' (paragraph 208). It specifies that the planning system must be 'plan-led' (paragraph 196) and that '**for the purposes of decision-taking, the policies in the Local Plan (and the London Plan) should <u>not</u> be considered out-of-date simply because they were adopted prior to the publication of this Framework' (paragraph 211)**. Specifically it says that after March 2013 'due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework' (paragraph 216). As set out later, the protection of the land at Leckhampton is entirely consistent with the core planning principles and key elements of the NPPF relating to sustainability, the empowerment of local people, protecting the countryside and recognising its 'intrinsic character', conserving the natural environment and prioritising the use of previously developed (brownfield) land.

The Local Plan sets out the challenge for councillors considering applications on the urban fringe:

'Cheltenham owes much to its setting at the foot of the Cotswold escarpment. The town's eastern fringes include the high quality scenery of the escarpment, with landscape and woodlands that are amongst the most attractive in the English countryside...

About 38% of the Borough is countryside. It accommodates the activities of agriculture, forestry and recreation as well as providing habitats for a diversity of wildlife... **The countryside is also under continued pressure from developers, especially for residential development, which threatens to erode its character. These problems are most acute on the urban fringes**.'

Cheltenham Borough Local Plan second review, July 2006, paragraphs 7.1 & 7.2

The Plan then specifically addresses the 'unallocated land' at Leckhampton:

UNALLOCATED LAND AT LECKHAMPTON

7.40 Land at Leckhampton has been the subject of development pressure for a number of years. The Inspector considering objections into the Second Review of Cheltenham Borough Local Plan concluded that, "development of the objection site would materially harm the rural character and appearance of the area, and the important contribution that this makes to the landscape within the site and when seen from the AONB."

7.41 **The Council supports the Inspector's conclusions and considers that the intrinsic value of the land should be protected as a resource for its recreational, landscape, wildlife and archaeological interest**. Any proposals for development within this area will be considered against policies CO 1 (landscape character) and CP3 (sustainable environment).

7.42 In the consideration of growth, land at Leckhampton together with all potential development sites across the Borough will be reassessed within the context of the Regional Spatial Strategy for the South West to inform Cheltenham's emerging Local Development Framework. This will require cross boundary working with Tewkesbury Borough Council and relevant communities.

Cheltenham Borough Local Plan second review, July 2006, paragraphs 7.40-42

This application runs counter to the intention of the Local Plan set out above, not just in its specific policy on Leckhampton but also in its general approach of protecting the urban fringe countryside around Cheltenham. The application is also in specific breach of the following policies:

- **Policy CP 1: Sustainable development** (objectives O6 and O7)

  Development will be permitted only where it takes adequate account of the principles of sustainable development (note 1). In particular, development should:
  (a) conserve or enhance natural resources and environmental assets; and
  (b) give priority to the use of previously developed land (notes 2 and 3); and
  (c) make the most efficient and effective use of land (note 3).

  Note 1 to this policy says that 'each of the principles of sustainable development set out in table 2 may be taken into account as a material consideration in the determination of planning applications.' Table 2 sets out the principles of sustainable development and includes the following relevant to Leckhampton:

  - **protecting sites of archaeological and historic interest and their settings**
  - **conserving green space and trees**
  - **safeguarding attractive landscape**
  - **protecting and creating wildlife habitats**
  - **protecting the quality of water, land and air**
  - **minimising the risk of flooding**
  - **reducing gases causing climate change**
  - **using brownfield land before Greenfield**
  - **ensuring that specific groups of the population are not disadvantaged by development**
  - **protecting and improving personal and community health**
  - **promoting and enhancing quality of life**

- **Policy CP 3: Sustainable environment** (objectives O9, O11, O12, O16, O18 and O30)

  Development will be permitted only where it would:
  (a) not harm the setting of Cheltenham (note 1), including views into or out of areas of acknowledged importance (note 2); and
  (b) not harm landscape character (note 3); and
  (c) conserve or enhance the best (note 4) of the built and natural environments; and
  (d) safeguard and promote biodiversity (note 5); and
  (e) not give rise to harmful levels of pollution (note 6) to land, air or water (surface or ground); and
  (f) minimise the risk of flooding (note 7).

* This is one of the policies which the Local Plan explicitly states does apply to Leckhampton (see above).

Notes 1 and 3 refer explicitly to the Cotswolds AONB and Note 1 explains that the 'Setting' of Cheltenham is defined as those features which create the distinctive sense of place for

the Borough, including the Cotswold escarpment and its green spaces – which are directly relevant to the Leckhampton site which is directly under the Cotswold escarpment and adjacent to and visible from the AONB at Leckhampton Hill. This green space is demonstrably special to local people who have campaigned for it for many years, attracting more than a thousand members to the Leckhampton Green Land Action Group.

Note 4 to this policy explains that conserving or enhancing the 'best' of the natural environment means conserving or enhancing features which make a significant contribution to the character, appearance, amenity or conservation of a site or locality. The character and quality of the land at Leckhampton has been repeatedly referenced by planning inspectors. In 1993 **Inspector Brian Dodds** ruled that 'the land at Leckhampton should be protected for its special historical, landscape and amenity value'. In 2003 **Inspector Mary Travers**, conducting an enquiry into an earlier plan to develop the same land, reported that the area had 'a gently rolling, topography and an attractive pastoral character that in my view links strongly into the landscape of the AONB.. it is apparent that development would entail a significant intrusion into views of the open countryside and the AONB from the existing edge of the built-up area.. its visual impact on the surrounding countryside would be very significant and that it could not be easily mitigated."

Even by the recent Amec review commissioned for the JCS team waxed lyrical about the area:

'Located between the A46 Shurdington Road and the Cotswold AONB, this land forms part of the countryside which separates Cheltenham and Gloucester.

The landform is gently undulating at around 70-80m AOD and land use is mainly pasture. Whilst woodland cover is limited, there is a large network of hedgerows, most of which are very well maintained at a variety of heights with occasional trees. This creates various levels of enclosure, giving an impression of a well-wooded landscape in flatter area. There is a very prominent landform and field pattern to the south adjacent to the AONB which is vulnerable to change and is considered to be a valuable landscape resource. Only a small area has limited intrinsic landscape value where previous character has already been lost.

There are key views from national trail/public rights of way within the AONB to the south of the area from Hartley Hill and Shurdington Hill. The area displays unusual land use patterns with many small holdings, orchards and allotment/market gardens with a good brookline and associated tree cover. The area displays a mosaic of habitat types with good connections to the east, south and west.'

AMEC JCS Site assessment/capacity testing final report, October 2012

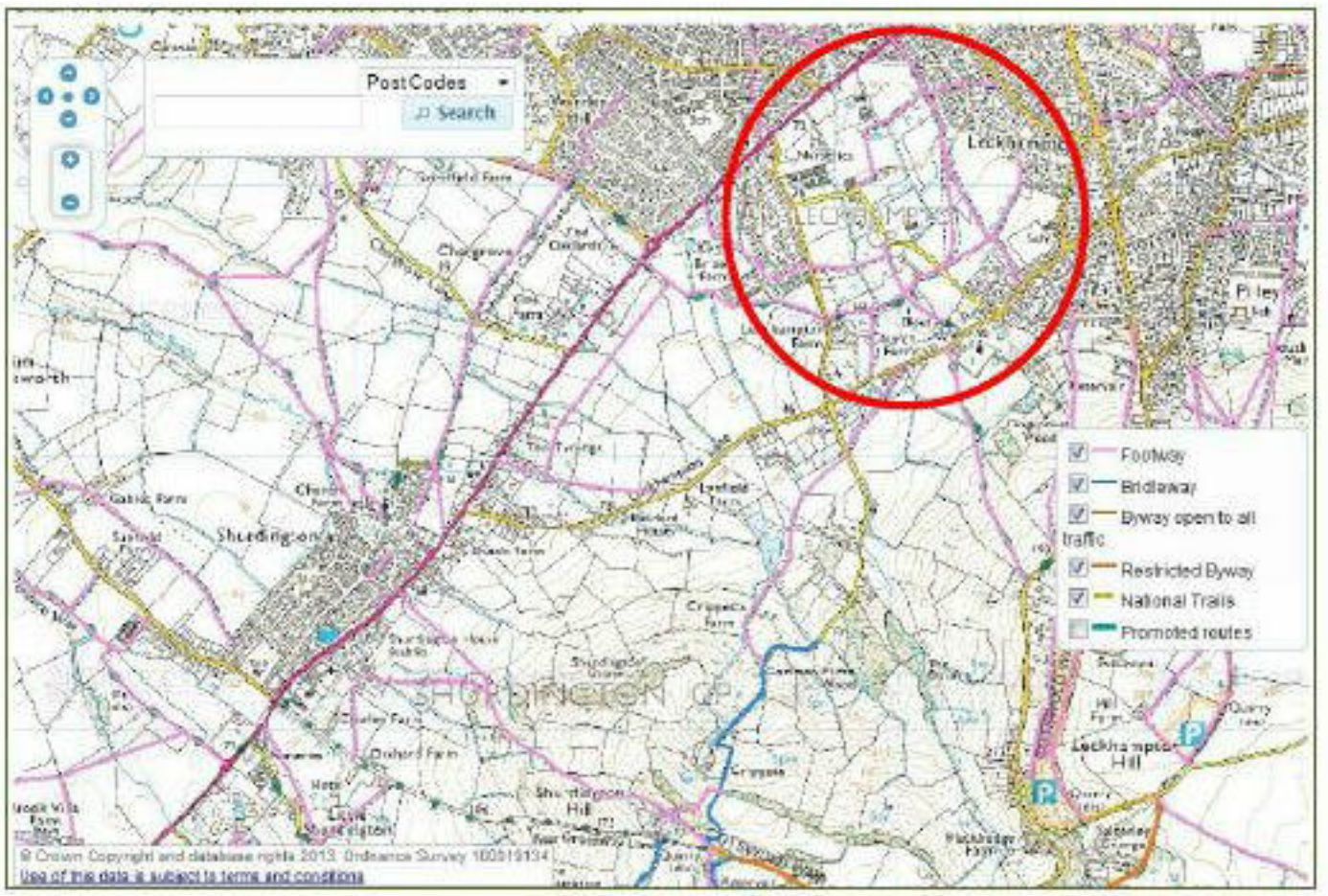
- **Policy CP 4 *Safe and sustainable living (o***bjectives O3, O4, O16, O23 and O32)

  Development will be permitted only where it would:
  (a) not cause unacceptable harm to the amenity of adjoining land users and the locality (notes 1- 4); and

(b) not result in levels of traffic to and from the site attaining an environmentally unacceptable level; and
(c) make adequate provision for security and the prevention of crime and disorder (note 5); and (d) not, by nature of its size, location, layout or design, give rise to crime or the significant fear of crime or endanger public safety; and
(e) maintain the vitality and viability of the town centre and district and local shopping facilities.

The application would contravene a) and b) of this policy, first by damaging the unique network of public rights of way close to an urban population which give access to an area of rural and agricultural character on reasonably flat and accessible land and then by imposing huge amount of extra traffic onto already highly congested local roads. The steep Cotswold escarpment and AONB nearby have many wonderful qualities but accessibility is not one of them, even for those with modest mobility issues (including toddlers and young children as well as older residents). Nor does much of the farmland in the adjacent Green Belt further outside Cheltenham provide anything like the same levels of access with far fewer public rights of way, since they do not share the legacy of Leckhampton's village history. Even if the development preserves most of the public rights of way, they would no longer provide free access to green space in the same way, thereby removing an amenity which is proven to reduce health inequalities.





The site's unique close network of public rights of way on reasonably level, accessible green land provides an important amenity to an urban population – in contrast to Green Belt farmland further outside Cheltenham or the steep escarpment within the AONB.

The traffic problems that would be caused by the application have been addressed by many other objectors and I share their concerns. This is addressed in more detail later in this letter of objection.

- **Policy CP 7 Design** (objective O2)

  Development will only be permitted where it:
  (a) is of a high standard of architectural design; and
  (b) adequately reflects principles of urban design; and
  (c) complements and respects neighbouring development and the character of the locality and/or landscape (note 3).
  Extensions or alterations of existing buildings will be required to avoid:
  (d) causing harm to the architectural integrity of the building or group of buildings; and
  (e) the unacceptable erosion of open space around the existing building.

  This application contravenes part c) of this policy as it shows no evidence whatsoever of complementing and respecting the mixed rural , village and period character of Leckhampton but simply extends a set of off-the-shelf modern urban designs into the countryside. It is difficult to imagine a better example of old-fashioned urban sprawl.

- **Policy GE 2 Private green space** (objectives O12 and O18)

  The development of private green areas, open spaces and gardens which make a significant townscape and environmental contribution to the town will not be permitted.

  Note 2 adds that the fact that a site is the most cost-effective development option for the applicant is not justification for an exception to policy GE 2, nor is the present lack of an alternative site.

  Note 3 explains that 'In determining whether a green space has a significant townscape and environmental value, the Council will have regard, among other factors, to its contribution to the following:
  (a) the spacious character of the town;
  (b) the quality of the local townscape;
  (c) the established character of the locality;
  (d) the setting of an important building or group of buildings;
  (e) important landmarks, views and vistas within and out of Cheltenham;
  This list of considerations is not intended to be exclusive.'

  The Leckhampton site qualifies on many of these grounds, especially a) c) d) and e). It provides a green landscape within the urban area which also provides a setting for views of Leckhampton Hill from the town. The wider site contains an important ancient historical site and the development would remove an important sense of space in the locality which currently benefits residents of Hatherley and Warden Hill, the Lanes and Leckhampton itself. Development here would contribute to the growing sense of continuous urban sprawl.



The extraordinarily open view of Leckhampton Hill from the Shurdington Road within urban Cheltenham (the Lanes and housing around Kidnappers Lane are immediately to the right, Warden Hill is behind the camera and Cheltenham's central built-up area begins just to the left). This view would be completely obscured by the proposed development, adding to everyone's sense of endless urban sprawl and so contravening Local Plan policies CP3, GE2and CO1.

- **Policy GE 6 Trees and development (o**bjective O12)

Development which would cause permanent damage to trees of high value (note 1) will not be permitted.
The following may be required in conjunction with development:
(a) the retention of existing trees; and
(b) the planting of new trees (note 3); and
(c) measures adequate to ensure the protection of trees during construction works.



Note 1 explains that 'High value' does not mean some exceptional or rare tree but <u>any</u> sound and healthy tree with at least 10 years of life remaining which makes a significant contribution to the character or appearance of a site or locality. There are many trees in the site that would meet this criterion (see photo on previous page and aerial view, right).

- **Policy CO 1** ***Landscape character*** (objectives O9, O10 and O12)

  Development will only be permitted where it would not harm:
  (a) attributes (note 1) and features (note 2) which make a significant contribution to the character, distinctiveness, quality and amenity value of the landscape; and
  (b) the visual amenity of the landscape.

  * This is another policy which the Local Plan explicitly states does apply to Leckhampton (see above).

  Note 1 explains that 'attributes' of the landscape are defined as being the inherent characteristics of the locality, including openness or enclosure, key views or vistas, topography, and patterns in the landscape such as those defined by historic land uses, roads and lanes, buildings, hedgerows or water courses. Note 2 explains that 'Features' include those constituent parts of the landscape that either in their own right, or in combination with landscape attributes, give the locality its particular character and distinctiveness, including for example, trees, hedges, geological or geomorphological features, rights of way, watercourses, ponds and buildings as well as other structures.

  This distinctive overall 'rural character' of the land at Leckhampton is clear to see in the area itself and has been repeatedly referenced over the years by inspectors at appeal, by the AMEC review, by the Parish Council concept for the Local Green Space designation and, of course, in the Local Plan itself as detailed at the outset of this section.

2. The application attempts to pre-empt the current process of consultation and refinement of the emerging Joint Core Strategy, in which the inclusion of this land at Leckhampton is extremely contentious and to which there are many significant unresolved objections.

Paragraph 216 of **the National Planning Policy Framework** is clear that 'decision-takers ***may*** also give weight' to emerging plans – in our case the Joint Core Strategy (JCS) that will also determine many aspects of the new Cheltenham Local Plan. Three factors are then listed as relevant:

- The stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given)
- **The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given)**; and
- The degree of consistency of the relevant policies in the merging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

The latest draft of the JCS does include development of an urban extension covering the land at Leckhampton but this is hugely contentious and it is quite possible that if even some of a number of factors influence later versions of the JCS that the allocation envisaged at Leckhampton may be sharply reduced or even removed altogether:

- Changes to the JCS housing model to refocus on environmental and social factors not just economic ones, leading to reduced growth rate in housing for inward migration;

- Reduced absolute numbers through more accurate and appropriate modelling, eg ONS spring 2014 figures
- Reduced absolute numbers on the basis that the projected numbers cannot be met sustainably
- Rebalancing towards more dispersed development not urban extensions
- Rebalancing of allocations between Cheltenham and other areas. Cheltenham's projected need in the JCS documents is actually 10,000 not the 10,849 actually allocated. This adjustment alone could remove most of the allocation at Leckhampton.
- Addition to the JCS plan, if necessary, of well-planned new settlements instead of urban extensions, for instance at Sharpness, Highnam or elsewhere.

All of these are being argued for by various submissions to the JCS.

Opposition to the inclusion in the JCS of development at Leckhampton is being argued by:

- Both myself as MP and my principal prospective parliamentary opponent who, between us, are likely to command some 90% of the popular vote at the next General Election (just as the Conservative candidate and I did at the last)
- All elected representatives of the area at District and County level
- Leckhampton with Warden Hill Parish Council
- The Cheltenham Chamber of Commerce which favours development north-west of Cheltenham but wants the southern urban extension ruled out
- The Leckhampton Green Land Action Group which has recruited more than 1,000 local members over the years specifically to protect this land
- Almost every correspondent commenting on the plan in local media such as the Gloucestershire Echo
- Very large number of objections already made to this application and to the inclusion of Leckhampton in the JCS in the recent consultation.

Objections are being made on grounds of:

- Sustainability, including errors in the Sustainability Appraisal process
- The opportunity for the Leckhampton to be designated a Local Green Space
- Loss of amenity, especially to multiple rights of way for less mobile residents such as the very young, elderly and disabled who cannot access more challenging landscapes such as the AONB itself
- Compromising the setting of the AONB
- Health and free recreational value lost and impact on health inequalities
- Negative impact on local traffic congestion and air quality
- Flood risk, particularly to Warden Hill immediately downhill of the site
- Lack of infrastructure
- Climate change impact
- Economic impact of loss of ecosystem services and attractive setting for Cheltenham

In summary there are substantial, widely-shared and unresolved objections to the extremely controversial inclusion of Leckhampton in the latest version of the JCS. These clearly meet the condition in paragraph 216 of the National Planning Policy Framework and so this element of the emerging JCS should <u>not</u> be accorded significant weight.

Furthermore the JCS is far from complete. It is not due for submission to the Secretary of State until winter 2014 and before then we have to see the outcome of the recent consultation, a pre-submission draft and further consultation and an examination in public by the planning inspectorate – during all of which the inclusion, exclusion or reduction of the controversial urban extension at Leckhampton will be a major issue.

The leader of the council, Cllr Steve Jordan, made very clear at the 5 September 2013 meeting of Cheltenham Borough Council[1] which considered the JCS that the process was far from complete and that

- the Parish Council proposal for an LGS designation at Leckhampton 'will be reviewed and taken into account as a consultation response to the draft JCS'
- 'All the statistics used as part of the evidence base would be open to challenge during the consultation phase'
- 'the allocation target for Cheltenham was in the order of 10,000 until 2031 and the Leader's personal view was that if this figure could be reduced then this would be achieved by taking out one of the urban extensions.'

It would be quite wrong and against the instructions of the National Planning Policy Framework for this process to be plan-led and empowering of local communities to pre-empt the outcome of the recent consultation and all the remaining stages of the JCS process by granting this application and effectively forcing the inclusion of the urban extension at Leckhampton when these matters are explicitly still up for debate and reconsideration.

3. The application is contrary to the emerging Neighbourhood Plan as described in the concept drafted by Leckhampton with Warden Hill Parish Council

Some 600 Neighbourhood Plans are being brought forward in communities nationwide but the concept plan published by Leckhampton with Warden Hill Parish Council in May 2013 represents the only emerging Neighbourhood Plan in the Cheltenham area.

Neighbourhood planning is a key part of the government's planning reforms and was introduced through the Localism Act 2011, the legislation coming into effect in April 2012. The intent was to hand power down not just to large district councils but also to smaller communities and neighbourhoods and would make the views of local communities material to planning decisions, for instance over 'where new homes and offices should be built' (DCLG website).

Paragraph 183 of the National Planning Policy Framework says that 'Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need'. Neighbourhood plans must be in conformity with the JCS and so if the JCS does include large-scale development in a particular location, a Neighbourhood Plan cannot overturn that. But an emerging Neighbourhood Plan should

[1] http://www.leglag.org.uk/Welcome_files/CBC%20Printed%20minutes%20JCS%20Council%205th%20Sept.pdf

obviously influence the emerging JCS. The first core planning principle of the National Planning Policy Framework (paragraph 17) is that 'Planning should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area'.

Planning committees should therefore give weight to emerging Neighbourhood Plans which are being considered in the current JCS process – as the leader stated in the council meeting on 5 September 2013 – and not pre-empt them by granting applications which would completely undermine them.

The concept plan published by the Parish Council in May 2013 is of exceptionally high quality with detailed attention to many aspects of the site of the application which is part of the area which the Concept Plan argues should be protected through Local Green Space designation.

The Parish Council document includes in detail:

- Residents' views, including opposition to development plans running at 90%+ in local consultation events
- The history of Leckhampton, including the history of 'open' or common meadows and fields in the area of the application site
- The exceptionally rich local ecology, wildlife and habitats. Local wildlife includes five varieties of bat (including two priority species: the noctule and soprano pipistrelle), willow warblers, blue tits, cuckoos, yellowhammers, starlings, adders, grass snakes, hedgehogs and badgers. The concept plan highlights their importance of the traditional hedgerows and orchards in the context of the UK Biodiversity Action Plan.
- Sustainability including highlighting issues raised in the JCS Sustainability Analysis
- Traffic congestion and poor air quality
- Flood risk
- Landscape and visual impact
- Agricultural uses and value
- The area's connection to the nearby urban population

This must be one of the best researched concept plans for a Neighbourhood Plan anywhere in the country. It would be against the whole direction of new national planning policy if it was pre-empted by granting this application.

4. The application would pre-empt current applications for Local Green Space (LGS) status to be applied to this land during the plan-making process.

The land which includes the application site has now at least twice been requested for **Local Green Space status**, by me in my February 2012 submission to the JCS (and again in the most recent consultation) and by the Parish Council with their substantial Neighbourhood Plan concept plan detailed above. It is, to my knowledge, the only land which has been requested for LGS status in the JCS area.

The Local Green Space (LGS) policy originated in a Liberal Democrat policy paper *Our Natural Heritage*, of which I was co-author. It is intended to offer protection to sites that were not necessarily of huge scientific significance or great landscape value and not necessarily serving the specific functions of a Green Belt but nevertheless of great importance to local people – in other words exactly like the land at Leckhampton and potentially other equally valued land close to urban populations.

The policy was then included in the Liberal Democrat manifesto for the 2010 General Election, and then the subsequent Coalition Programme for Government. It was referenced in the government white paper on the environment published by the new government in June 2011, *The Natural Choice,* which called it 'a new Green Areas Designation that will give local people an opportunity to protect green spaces that have significant importance to their local communities.' [2]

It is the basis of many ministerial statements that the government has produced a tool that 'local communities can use to protect open places they value' (Prime Minister to Dame Fiona Reynolds of the National Trust, 21 September 2011).

It was duly included in the National Planning Policy Framework:

76. **Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.** Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.

77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- where the green space is in reasonably close proximity to the community it serves;
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty,
- historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- where the green area concerned is local in character and is not an extensive tract of land.

National Planning Policy Framework pp 18,19

[2] *The Natural Choice: securing the value of nature*, TSO June 2011, para 4.23, p49

So designation can only take place at this moment – as we are producing a JCS and then Local Plans. It is not a tool that can simply be produced whenever an unpopular planning application emerges. Nor does it remove the obligation on local councils to meet other requirements of the NPPF, for instance to try to meet objectively assessed housing need.

But it is designed to **protect** against development those areas which are demonstrably special to local communities. An important footnote to in the NPPF is relevant. The NPPF states at Paragraph 14 that Local Plans should meet objectively assessed needs for housing ***unless*** specific policies in the Framework indicate that development should be restricted. The footnote on p4 then specifies a list of protections that could be used in this way and they include the Local Green Space designation.

In other words, LGS designation in a JCS or Local Plan can be used to restrict development and reduce the numbers which may be required by the objectively assessed need. The objectively assessed cannot logically be used to rule out LGS designation.

As I detailed in my submission to the JCS consultation, **the land including the application site at Leckhampton meets all the criteria for LGS status set out in the National Planning Policy Framework:**

- The Leckhampton green land is in very close proximity to the community it serves;
- It does not overlap with Green Belt or AONB;
- It is demonstrably special to the local community, having led to the creation of its own pressure group and generated many thousands of petition signatures, letters, emails and individual attendances at meetings over several decades and is the subject of the LGS application in the Parish Council Neighbourhood Plan concept plan.
- It holds significance, for its unkempt rural charm, its animals so close to where children can go to 'see the pigs', its history, recreational value, tranquillity and the richness of its wildlife as detailed in innumerable submissions and consultation responses by thousands of local residents over the years.
- It is very local in character (as inspectors have noted) and not an extensive tract of land.

It has been suggested that the land at Leckhampton is too 'extensive' to be considered for LGS status. This is categorically wrong.

The NPPF beta guidance now online at http://planningguidance.planningportal.gov.uk makes clear "there are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgement will inevitably be needed".

The original Liberal Democrat policy[3] compared the new designation for community value to SSSIs for scientific value while the beta guidance says that it should not used to create "a new area of Green Belt by another name".

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[3] Our Natural Heritage (Liberal Democrats, 2009), para 4.2.1

The following size comparisons make it quite clear that areas comparable to or larger than the Leckhampton LGS application area have frequently been protected in a local context as parks or SSSIs and that its area is not remotely comparable to those of Green Belts, which are genuinely extensive:

Leckhampton LGS application area	56 hectares
Nearest SSSI at Crickley Hill & Barrow Wake	55 hectares

Famous protected green spaces in Greater London:

Hyde Park	142 hectares
Clapham Common	89 hectares
Kensington Gardens	111hectares
Green Park/St.James's Park	70 hectares
Hampstead Heath	320 hectares

Famous local protected green spaces:

Pittville Park	33 hectares
Lineover Wood	50 hectares
Dowdeswell Wood	82 hectares

Another famous protected green space, close to the home of planning minister Nick Boles MP:

Burghley Park, Lincolnshire	565 hectares

Green Belts:

Cheltenham & Gloucester (the smallest in the country)	6,694 hectares
Average for England	114,286 hectares

It has also been suggested to me that LGS designation cannot be made during the JCS process but only during the subsequent creation of Local Plans. This is <u>not</u> the case. The planning minister wrote to me in answer to this specific question:

> **"It is a matter for the local planning authorities to decide whether they define such areas in their Joint Core Strategy, or in individual Local Plans."**
>
> Letter from Nick Boles MP, Department of Communities & Local Government, to Martin Horwood MP, 18 December 2013.

So, in summary, the application site is included within an excellent and perhaps the only candidate for the government's flagship Local Green Space designation in our JCS area. Application has been made by the Parish Council, supported by the MP and local councillors and is currently under consideration as part of the JCS process. It would be quite wrong and against the intention of the Localism Act and the National Planning Policy Framework to dismiss all of this by granting the application which covers much of the LGS application area.

5. The site is not appropriate for development because of its rural character, agricultural value and proximity to the Cotswolds Area of Outstanding Natural Beauty and has been repeated rejected for development by inspectors on these grounds .

Much has been written about the value and character of the green land at Leckhampton which is rich in history, naturally alleviates flood risk to neighbouring Warden Hill and Hatherley and produces local food and local jobs, including the farming of rare local pigs.It has a flourishing ecology, and is rich in biodiversity including five species of bat as well as deer, slow-worms, grass snakes and common toads, and seven bird species on the RSPB red list. Buzzards nested in Lott Meadow this year.

The original JCS Sustainability Analysis p112 concluded that the broad location south of Cheltenham, including Leckhampton, enjoyed:

- 'Sites of biodiversity value' (RED)
- 'Development of the site would be likely to lead to the fragmentation of important habitats' (RED)
- 'The area displays a good mosaic of habitat types which could make mitigation difficult' (RED)
- For overall biodiversity impact, the site shows 'intimate rolling landscape, predominantly pastoral with improved and semi-improved pasture. Good hedgerow condition and good proportion of orchard ... good number of parkland trees and many veteran oaks along with other species. Small pockets of woodland dotted around the site. Area around Leckhampton displays unusual land use pattern with many smallholdings, orchards and allotment/market gardens. Good brookline and associated tree cover.' (RED)

Inspectors have repeatedly rejected appeals by developers, citing the rural character of the land:

- **In 1993** Inspector Brian Dodds ruled that **'the land at Leckhampton should be protected for its special historical, landscape and amenity value. It represents the last example of the gradual transition between the urban area and the countryside which characterised the Regency town.** It should be considered anew for green belt or AONB status, for 'landscape conservation area' status, and as part of a Leckhampton Conservation Area (35A, 129W).

- **In 2003** Inspector Mary Travers, conducting an enquiry on Leckhampton development reported that:

  "2.25.11 The site consists of four fields subdivided by substantial hedgerows that are interspersed with hedgerow trees. It has a gently rolling, topography and an attractive pastoral character that in my view links strongly into the landscape of the AONB immediately to the south of Leckhampton Lane. Generally the contours fall from south to north and from east to west and there is a distinct ridge running roughly northwest-southeast through the site- -so that the south-eastern corner is the most elevated part. A public footpath that traverses the northern part of the site forms a link in a network of rural paths to the east and west of the site.

  "2.25.12 As can be observed from public vantage points, the site is highly visible from within the AONB, for example from the lower slopes of Leckhampton Hill and

from higher up at the Devil's Chimney. It is also visible partly from the west and in long distance views from the north. There is a substantial hedgerow on the western boundary with the Green Belt but this area drops away towards the Vale of Gloucester As a result, development on the more elevated south-eastern part of the site would be very conspicuous from the western approach along Leckhampton Lane where it would be seen within the context of the AONB. And looking southwards from the public footpath across the site **it is apparent that development would entail a significant intrusion into views of the open countryside and the AONB from the existing edge of the built-up area. It would also sever the link between the rural footpaths to the east and west of the site and replace it with one of an entirely different character. For these reasons and taking into account the scale of the proposed development, I consider that its visual impact on the surrounding countryside would be very significant and that it could not be easily mitigated."**

- **In 2005**, Inspector David Asher was looking into the Cheltenham Local Plan, and concluded "that **the development of the objection site would materially harm the rural character and appearance of the area, and the important contribution that this makes to the landscape within the site and when seen from the AONB**."

Other submissions to the JCS and objections to this application have made more specific points, for instance the Gloucestershire Orchard Trust JCS submission of 20 November 2013 which says that 'the fertile sheltered Severn Vale soils beneath the Cotswold escarpment are among the most favoured sites for orchards of all kinds. The JCS area takes in a substantial part of this zone, and the remaining traditional orchards here are now among the most threatened in the country'. The application site includes just such an orchard site.

6. The application is therefore in breach of the National Planning Policy Framework (NPPF)

Repeated reference has been made throughout this letter of objection to the National Planning Policy Framework (NPPF). This key government document is often quoted selectively by developers and others as if it was a developer's charter. It is not.
The key element of the NPPF is often cited as the presumption in favour of sustainable development. But the presumption in favour of *development* was already there in planning law and policy. What the NPPF added, very significantly, was the element of ***sustainability***.

The Department of Communities and Local Government itself has made clear:

> 'The presumption is not a green light for development. All proposals will need to demonstrate their sustainability and be in line with the strict protections in the draft Framework. Strong environmental safeguards remain as part of the planning system, including protecting communities and the environment from unacceptable proposals. **The presumption is principally about good plan making. Once a Local Plan is put in place, local decisions should be made in line with it.**'
>
> DCLG, *National Planning Policy Framework: Myth-Buster*, 8 September 2011

This application is incompatible with the current valid Local Plan and the new plan has not yet been agreed so the assumption in favour of sustainable development should not be used in this case.

Weight ***may*** be given to the emerging JCS – which does, for now, include development at Leckhampton - but paragraph 216 of the NPPF places clear limitations on this including the stage of preparation which is far from complete in our case, and most crucially the extent to which there are unresolved objections to relevant policies. This is certainly true in the case of development at Leckhampton which must be one of the most contentious inclusions in the whole JCS and is part of an urban extension which the leader of Cheltenham Borough Council has clearly stated could be removed at the next stage of the JCS.

A key theme of the NPPF is the empowerment of local communities and neighbourhoods (see the ministerial foreword, paragraph 1, the first core planning principle at paragraph 17 and many other paragraphs throughout the NPPF).

Paragraph 155 gives particular weight to consultation with neighbourhoods – by which it means local neighbourhoods roughly equivalent to parishes:

> **"Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made."**

Weight should therefore clearly be given to emerging Neighbourhood Plans. The Neighbourhood Plan concept submitted by Leckhampton with Warden Hill Parish Council must therefore be seriously considered in this context.

The Local Green Space designation is formally introduced into national planning policy for the first time in paragraphs 76 and 77 of the NPPF, specifically to give local communities a tool with which to protect green spaces close to the urban area which are of special value to them, not just to wildlife and landscape painters. If granted, this application would pre-empt and completely undermine the only LGS designation being considered in the Cheltenham area.

The original reasons for the area's protection in the Cheltenham Local Plan are also supported by the NPPF. Four of the core planning principles set out in the NPPF right next to the one about meeting development needs, state that councils should:

- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, **recognising the intrinsic character and beauty of the countryside** and supporting thriving rural communities within it;
- contribute to **conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value**, where consistent with other policies in this Framework;
- encourage the effective use of land by **reusing land that has been previously developed (brownfield land)**, provided that it is not of high environmental value;

- promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, **recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);'**

Paragraph 74 says that 'Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- 'an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.'

Paragraphs 109 to 125 detail at length the requirements to protect the natural environment including:

- Protecting and enhancing valued landscapes (paragraph 109)
- Recognising the wider benefits of ecosystem services (109)
- Providing net gains in biodiversity (109)
- Preventing new developments from contributing to unacceptable levels of air pollution (109)
- Minimising effects on the natural environment (110)
- Encouraging the use of brownfield land (111)
- Protecting biodiversity, wildlife and landscape value (113, 114, 117, 118)
- Reducing physical pollution (120, 124)
- Reducing light pollution (125)

All of these can be cited in opposition to this application and in conformity with the existing Local Plan.

I urge the council to reject this application.

[redacted]

Martin Horwood MP
Member of Parliament for Cheltenham

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Lufton & Associates
Chartered Planning Consultancy
4 Beechcroft Avenue
Stafford
ST16 1BJ
28/10/2013

FAO Mr C. Hemphill
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
GL50 9SA

RE: Planning Application Ref P13_01605

Outline Planning Application for up to 650 dwellings, mixed use local centre of up to 1.94ha comprising of a convenience store class A1 (400m2), pharmacy and GP surgery and 4,500m2 of unspecified (non-residential) use, a primary school of up to 1.72ha land area, principal access and open space.

Submission of Lufton & Associates Chartered Planning Consultancy for LEGLAG

Lufton & Associates have been commissioned by Leckhampton Green Land Action Group (LEGLAG) to give a professional opinion of the planning and sustainability merits of the above proposal, report to them and provide a response to the District Council.

In particular this assessment and representation focusses on the planning suitability of this proposal and whether it is compatible with the policies of the 'Development Plan' including the emerging Joint Core Strategy and other relevant local and national policies, strategies and regulations.

The application although containing mixed-uses is predominantly a major housing proposal and examination of the Masterplan and supporting documents reveals that other uses are consistent with an overall residential proposal.

The 4,500m^2 of additional floorspace described as being available for a number of uses from health centre to 'other A-class uses' is particularly vague and uncommonly elusive even for an outline proposal. It is difficult to see how a planning authority could make any rational assessment of this unspecified element of the scheme and the applicant must be confused in thinking that they have submitted an application in a free planning zone.

Housing Land Supply – 5 year land supply

Since the demise of much of national planning policy guidance and consolidation into the National Planning Policy Framework (NPPF) it is widely acknowledged that the demonstration of a 5-year land supply for housing has become an ever more critical consideration in the determination of housing proposals. It is the subject of countless hours of debate at Public Inquiries and critical to a large proportion of appeal decisions made by Planning Inspectors.

Paragraph 47 of the NPPF requires that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years supply of housing when set against their housing requirements with an additional buffer of 5% and, where there has been a record of persistent under delivery of housing, with an additional buffer of 20% to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.

The annualised figure against which the 5-year housing land supply is assessed is a matter of contention. The applicant is very keen to draw the Council's attention to the recent appeal at Hunting Butts in Cheltenham a decision made over 15 months ago on an application seemingly made in 2011 (RPS Planning Statement pages 42-45). While the appeal decision is of interest it is just a single appeal decision selected by the applicant to justify their case and has no legal precedent or implication for the current proposal.

Cheltenham Borough Councils 5-year Housing Land Supply statement (undated) is based on an assessment period 1st April 2012 to 31st March 2017 and uses a baseline housing requirement brought forward from the Secretary of States Proposed Changes to the South-West RSS. This gives an overall requirement over the plan period, 2006-2026, of 8,100 dwellings for the district and an annual requirement of 405 dwellings.

Accounting for net completions of dwellings 2006-2012 the annual housing requirement is increased to 421 dwellings (in the Borough Councils 5-year statement).

The applicant advocates an annual housing requirement in the Borough of 449 dwellings (RPS Planning Statement page 42) to account for 'under-provision' against the housing requirement.

Accounting for under-provision (backlog) housing requirements is a contentious issue and many arguments specific to local conditions can be considered as to whether making up a backlog is appropriate or not. In the case of the situation in Cheltenham the 'backlog' is not greatly significant anyway.

Setting supply against the housing requirement the Councils statement confirms a 4.7 years supply, reduced to a 4.5 years supply using a 5% buffer allowance and 3.9 years using a 20% buffer allowance. The buffer is simply to allow an adjustment for sites that have been included in supply that might not come forward and as national policy (NPPF) requires should be based on evidence of past performance.

By using an alternative method (Sedgefield method) for calculating how the perceived housing backlog should be brought forward and on the supply side making no allowance for windfall developments the applicants housing supply reconciliation

produces 4.2 years supply, reduced to a 4.0 years supply using a 5% buffer allowance and 3.6 years using a 20% buffer allowance (RPS Planning Statement page 42).

It seems entirely reasonable and appropriate to take the Councils 4.5 year land supply as the most reasonable quantification. The Borough doesn't appear to have a particular difficulty or unwillingness to bring sites forward so there seems little justification for adding a 20% buffer requirement. The windfall allowance seems entirely reasonable based on the methodology set out and the documented work on the capacity of urban areas.

Of course a half year land supply shortfall amounts to just over 200 dwellings and the application is for 650 dwellings. If the Borough Council were to approve this application and consider it deliverable the Borough would have considerably more than a five year supply (six years). To rationally consider the land supply position against the Joint Core Strategy process it immediately appears unnecessary to bring forward this proposal while good progress is being made on bringing forward a Joint Core Strategy.

There appears no immediate pressure on the Borough Council to positively determine this application just to address short-term housing supply requirements.

Prematurity

It appears critical to the decision that this planning application due to be considered imminently by the Borough Council has been made at a time when the planning strategy for Cheltenham is emerging with a Joint Core Strategy on consultation until 26th November 2013. Very clearly at this stage the plan process is not finished in the Borough and there are a number of important stages ahead.

The first core planning principle of the NPPF at paragraph 17 states;

'planning should... be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency;'

It is clear that a positive determination of this application at present would be outside the spirit of a Development Plan led system and including proper, meaningful and fair consultation with the communities not only in Cheltenham but also those in Gloucester and Tewkesbury. These issues lie at the heart of the National Planning Policy Framework and the current government's Localism agenda.

This is emphasised by examining the Draft Joint Core Strategy (page viii) where nine strategic allocations are identified including 'South Cheltenham - Leckhampton'. This strategy is at a formative stage with nothing yet tested through public examination. Not the overall scale of the housing requirement, the distribution between plan areas or the allocations themselves.

Despite the references to Regional Spatial Strategies the *Planning System: General Planning Principles* statement produced by the then ODPM (2005) remains extant. Of direct relevance to the circumstances of this current application at Kidnappers Lane Leckhampton it states at paragraph 17;

"17. In some circumstances, it may be justifiable to refuse planning permission on grounds of prematurity where *a DPD is being prepared or is under review, but it has not yet been adopted. This may be appropriate where a proposed development is so substantial, or where the cumulative effect would be so significant, that granting permission could prejudice the DPD by predetermining decisions about the scale, location or phasing of new development which are being addressed in the policy in the DPD. A proposal for development which has an impact on only a small area would rarely come into this category. Where there is a phasing policy, it may be necessary to refuse planning permission on grounds of prematurity if the policy is to have effect."*

At paragraph 18 the *Planning System: General Planning Principles* statement continues with guidance on where refusal on the grounds of prematurity would not be justified, stating;

"Where a DPD is at the consultation stage, with no early prospect of submission for examination, then refusal on prematurity grounds would seldom be justified because of the delay which this would impose in determining the future use of the land in question"

With the three planning authorities making progress towards the adoption of the Joint Core Strategy this would not be a circumstance where a refusal on the grounds of prematurity would cause undue delay to the planning strategy.

It is clear that the proposal at Leckhampton as it comprises a major strategic housing allocation for the district should be regarded as significant and highly determinate to the overall planning strategy. It is exactly these circumstances where bringing forward proposals ahead of the adoption of the Joint Core Strategy should be treated as premature.

It is important to view the plan process as culminating in a long-term blueprint to shape the future development of Cheltenham and the plan area and not as a quick fix for dealing with a planning application that it is 18 years in advance of the end date of the plan period of 2031. The Council simply does not need to give this proposal permission at this stage and prejudice the plan process.

Prematurity – Public Consultation

It is clear public consultation has been done on the proposal and this is document at length in the 'Statement of Community Involvement' by Curtin&Co in support of the application. Notwithstanding that the public consultations themselves evidently indicate the overwhelming objection to the scheme what anyway is lacking is the assimilation of consultation done at stages in the plan process into a final coherent strategy for the future development of Cheltenham by which development proposals

should be determined.

It is the case that there are substantive objections to the planning strategy for Cheltenham, the allocation of this site and the policies and principles that are set out in the Joint Core Strategy. ***These need to be resolved through the planning process and an open Public Examination of that strategy and not through ad-hoc considerations of a major planning proposal.***

Housing Strategy – Delivery of a Comprehensive Scheme

It is evident from looking at the planning framework at regional and local scale that the delivery of comprehensive schemes with adequate and timely supporting infrastructure has been critical to the local authorities approach to considering the suitability of allocations to meet housing requirements. The emerging Joint Core Strategy to 2031 identifies a number of urban extensions with proposals for comprehensive planning and development, provision of infrastructure and assimilation into the local transport network.

The draft policy A6 of the JCS in relation to South Cheltenham and Leckhampton states;

'Land is allocated at South Cheltenham as shown on Strategic Allocation Plan 6 for approximately 1,075 dwellings. Proposals will be required to demonstrate that the following requirements have been addressed:

• *Demonstrate how the strategic allocation can be developed as a comprehensive urban extension…'*

In reference to land to the west of Farm Lane within the scope of the applicants indicative masterplan the Tewkesbury Local Plan to 2011 states (at page 22 under the reasoned justification for policy HOU1);

'If the SD2 [land west of Farm Lane] site is identified as part of a sustainable urban extension through the Green Belt review process then a process of joint working with Cheltenham Borough will be entered into in order to develop an appropriate comprehensive mixed development scheme for the area.'

The Tewkesbury Local Plan to 2011 further states in policy HOU1 that;

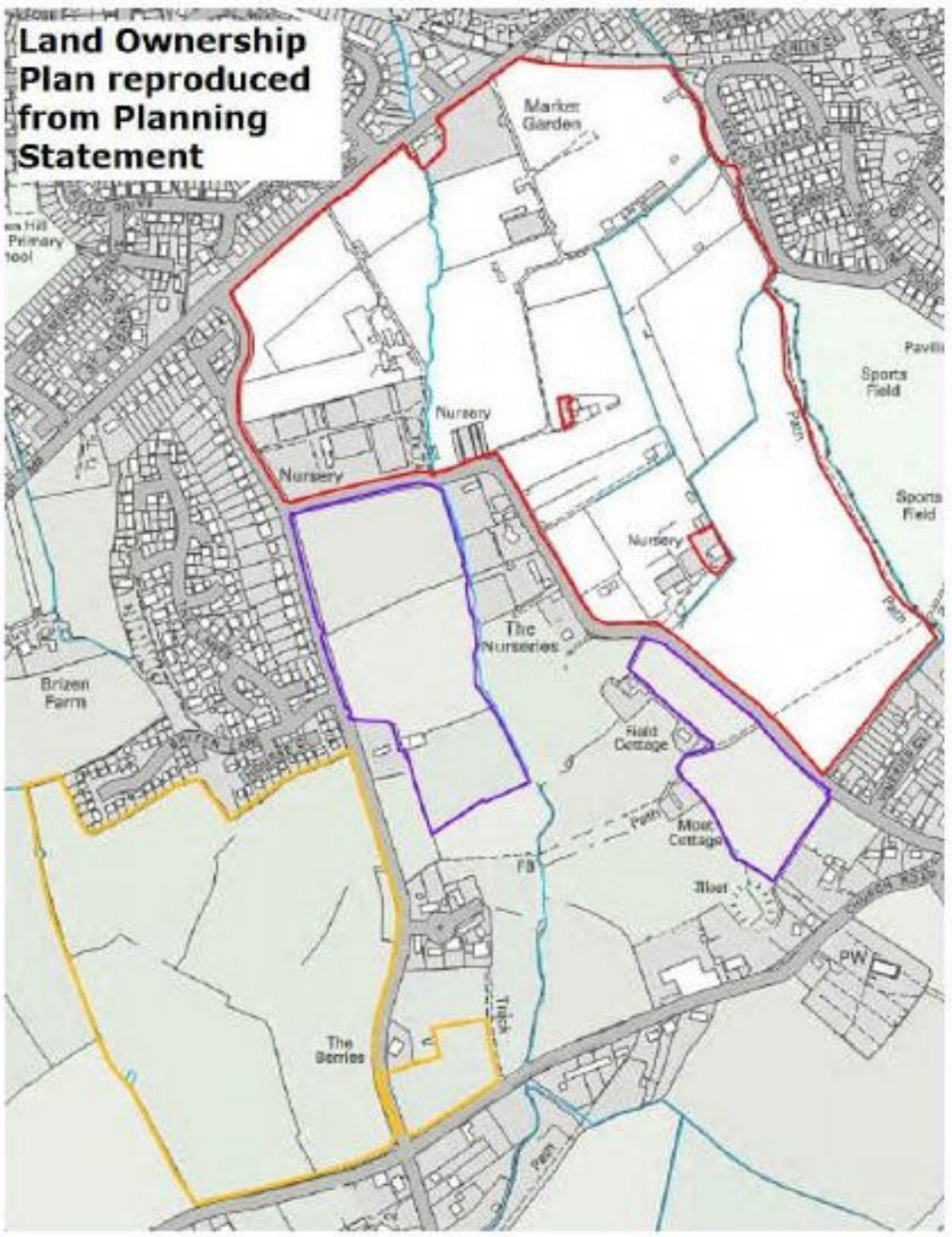
'PLANNING PERMISSION WILL NOT BE GRANTED FOR DEVELOPMENT OF THE SD2 SITE PRIOR TO ITS IDENTIFICATION AS AN APPROPRIATE LOCATION FOR STRATEGIC DEVELOPMENT THROUGH THE RSS PROCESS.'

There is no corresponding reference to comprehensive development of the application site in the extant Cheltenham Local Plan because of course the site is not identified for development.

There is some planning history in relation to concern over delivering a comprehensive urban extension that is indicative of a lack of integration between bringing forward the land subject of this application in Cheltenham and land within the administration of

Tewkesbury. The Secretary of State dismissed on appeal an application by David Wilson Homes and Martin Dawn PLC in 2008 on the land west of Farm Lane expressing severe reservations about shortcomings in the delivery of infrastructure that would prejudice a comprehensive development of an urban extension.

It is immediately apparent that the application proposal covers an area for residential development to the east wider than the indicative draft strategic allocation plan included in the JCS (at page.108, Plan 6) with residential development sited squarely in the area for landscape buffer/green infrastructure to the west of Merlin Way.



The applicants masterplan and other supporting plans also show a lack of integration with the Gloucestershire County Council land holdings east of Farm Lane and west of Kidnappers Lane and the MA Holdings land west of Farm Lane. These three major land areas do not adjoin each other on any boundary and look nothing like an area of comprehensive planning.

The indicative masterplan shows nothing on the intervening land to suggest a comprehensive approach to physical land assembly has been attempted.

Whether the proposals can be delivered as a comprehensive development is clearly a test of fact and degree. The consequences of poor planning and integration of a significant urban extension would be felt by the local community of Leckhampton and south Cheltenham for many years. The applicant has gone to some length to demonstrate evidence that there has been collaborative working with the local authorities, Cheltenham and Tewkesbury, and the other landowners that contribute to the overall proposal, MA Holdings and Gloucestershire County Council, although a number of issues indicate to the contrary;

- There is no jointly presented masterplan.

- The indicative plans of the access and movement strategy and spatial distribution of residential densities appear unilateral (at pages 128 and 131 of the RPS planning statement).

- The statement made at paragraph 6.41 of the planning statement appears self-evidently contradictory;

'The application proposals are consistent with the required comprehensive approach to planning the area through the area wide masterplan and the inclusion of all the required services and facilities within the application site. Further applications can readily be progressed for land owned by the County Council and MA Holdings for residential development, recreation space and other associated uses including potential allotments in accordance with the Illustrative Masterplan'

Why would all services and facilities be required in this proposal scheme in the north of the location if it is to be deemed part of a comprehensive urban extension. In fact all the services and facilities are not being provided as is clear from indications given of the s.106 heads of terms and particularly the proportional contribution offered to the building of the primary school.

- The uncertainty of the primary school proposal and at what stage it would be funded and constructed (paragraphs 12.7-12.8 RPS Planning Statement).

- The vagueness of the approach to providing public open space including allotments and community (paragraph 3.23 RPS Planning Statement) and the opportunity for this to be incrementally revisited and changed.

- The unilateral representations of the applicant in the approach to community involvement and the seeming lack of involvement of the 'other' landowners (as evidenced in the Curtis & Co document).

Protection of Open Countryside, Landscape and High Quality Agricultural Land

The RPS Agricultural Resources Assessment (September 2013) acknowledges the application site is predominantly farmland in production for a mix of arable and livestock keeping. A significant proportion of the land area, 33%, is acknowledged as being of high quality and versatility being classified as grade 2 and grade 3a.

Current estimates are that Grades 1 and 2 together form only about 21% of all farmland in England with Subgrade 3a covering a further 21% (Natural England TIN409 December 2012).

The approach to protecting high quality farmland is reflected in the NPPF paragraph 112 that states;

"Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality".

It is difficult to agree with the applicant's statement at paragraph 6.17 of the RPS Agricultural Resources Assessment (September 2013) that the agricultural production

and grazing on the land would have no significant effect on food production just because the plot sizes on the application site are small.

This response has extensively explored and concluded that it would be premature to determine this application ahead of the review of the JCS.

It is very clear that the proposal is contrary to the provisions of the adopted Local Plan (Jul 2006) and the saved policy therein and in particular it is noted at paragraph 7.42 that the Council has retained the position that should development at Leckhampton be considered necessary in the future it should only emerge after full consultation through the development plan process;

'*UNALLOCATED LAND AT LECKHAMPTON*

7.40 Land at Leckhampton has been the subject of development pressure for a number of years. The Inspector considering objections into the Second Review of Cheltenham Borough Local Plan concluded that, "development of the objection site would materially harm the rural character and appearance of the area, and the important contribution that this makes to the landscape within the site and when seen from the AONB."

7.41 The Council supports the Inspector's conclusions and considers that the intrinsic value of the land should be protected as a resource for its recreational, landscape, wildlife and archaeological interest. Any proposals for development within this area will be considered against policies CO 1 (landscape character) and CP3 (sustainable environment).

7.42 In the consideration of growth, land at Leckhampton together with all potential development sites across the Borough will be reassessed within the context of the Regional Spatial Strategy for the South West to inform Cheltenham's emerging Local Development Framework. This will require cross boundary working with Tewkesbury Borough Council and relevant communities.'

Further the Inspector of the Tewkesbury Local Plan strongly empahasised the harm that development at SD2 (west of Farm Lane) would do to the views from the Cotswold escarpment. The SD2 land area in Tewkesbury is actually adjacent to the AONB and is the closest part of the site to the especially important views across the Vale from Leckhampton Hill and Shurdington Hill, and is therefore the most sensitive part of the area from a landscape perspective.

It is the opinion of Lufton & Associates that the current proposal should be refused on the basis of;

- inconsistency and prematurity with the 'Development Plan' (NPPF para 17);
- the lack of established need for housing development in Cheltenham at the present time and ahead of the SHMA being prepared for the Joint Core Strategy (NPPF para 47);
- the inconsistency of the application with the protection of the best and most

versatile agricultural land (NPPF para 112).
- the non-conformity of the proposal with the adopted Local Plan and the protection afforded to open countryside and landscape character.

Yours Faithfully,

[redacted]

Hugh Lufton BA(Hons) DipTP MRTPI
Principal
Lufton & Associates

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13/01605/OUT

Land at Leckhampton

Representations

Batch 1

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

SHURDINGTON ROAD IS ALREADY VERY BUSY AND CANNOT TAKE MUCH MORE TRAFFIC

ALL ASPECTS OF PLANNING, TRANSPORT - ENVIRONMENT SHOULD BE VERIFIED

APPLICATION IS PREMATURE

BUILT
Recd 11 OCT 2013
ENVIRONMENT

Name [redacted] Ref. 13/01605/OUT

Address 49 THE PARK CHELTENHAM

BUILT
Recd 11 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING ARRLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

This area of Cheltenham, simply does NOT have the infrastructure in place to support any developments that would border Hatherley/Swindon. The roads are NOT big enough. 1 Secondary School is NOT enough.
The area of Shurdington road is already in Flood risk. with increased surface run off, this will only increase further, leaving local residents at greater risk of flooding.
I 100% object to any type of development.

Name [redacted] Ref. 13/01605/OUT

Address 5 Rosehip court, up hatherley
Cheltenham GL51 3WN

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

• IT IS ESTIMATED REASONABLY THAT 1000 EXTRA VEHICLES MAY ADD TO THE ALREADY CONGESTED ROAD NETWORK AROUND THE SOUTH EAST OF CHELTENHAM, PARTICULARLY THE A46. CONSEQUENTLY, NO_2 POLLUTION LEVELS WILL BREAK EU LIMITS MORE FREQUENTLY, THREATENING LOCAL RESIDENT'S HEALTH. THERE ARE INSUFFICIENT SCHOOL PLACES AVAILABLE AT LOCAL SCHOOLS AND NO PLANS TO EXPAND EITHER. THIS MEANS MORE TRAFFIC, AS THE PARENTS "TAXI" THEIR CHILDREN ACROSS CHELTENHAM. OBJECTION

Name [redacted] Ref. 13/01605/OUT

Address 16 SISSINGHURST GROVE
UP HATHERLEY

BUILT
Recd - 4 OCT 2013
ENVIRONMENT

Claverdon
20 Hawkswood Road
The Woodlands
Cheltenham
Glos.
GL51 3DS

3.10.2013

Dear Sirs

Ref. – 13/01605/OUT – Leckhampton Development

I examined ,today, the application and drawings for the above and found it to be most informative and well presented.

As you would expect it deals almost exclusively with the site development and having noted the roads entering and leaving the estate and the comments regarding air pollution and acoustics would like some further information please.

In the immediate vicinity of the site,namely the Shurdington Road where it is reasonable to expect a sizable proportion of resident's vehicles to enter and leave at this point what is the anticipated increase in air pollution,noise levels and number of vehicles particularly at the morning and evening 'rush hour'

Having seen the build up of traffic, in recent years, in this area consider this aspect needs to be carefully considered.

I look forward to your reply

Yours faithfully

[redacted]

[redacted]

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13/01605/OUT

Land at Leckhampton

Representations

Batch 2

BUILT
18 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

* The amount of traffic generated will be unmanageable and have a serious negative impact on an already busy and dangerous 'rush hour' - morning and evening.
* The schools in the area (primary and secondary) are already oversubscribed; the medical facilities in the area are in serious disarray; the local bus services will have to change and therefore have an impact on the air pollution, together with the extra cars the proposed 650 houses will generate.
* Will add to an already oversubscribed and over used area - adding another proposed GP surgery, offices, care home, primary school etc., will only add to the problem.

Name 'Moved' from

Address Leckhampton

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

The A46 is the only way out of Highwood Ave. We have lived here since 1974. On 2 counts - traffic volume & air pollution - the green has been operating at well over capacity at peak hours for years. The situation is now critical on both counts. It would be madness to think of making the situation worse with further development.

BUILT
Recd 18 OCT 2013
ENVIRONMENT

Name [redacted]

Address 50 Highwood Ave.
Cheltenham.

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Affordable housing is badly needed in this area, and so I wholeheartedly support the building proposals. Likewise the local primary schools are oversubscribed, so the inclusion of a new one in the plans is most welcome.

BUILT
Recd 18 OCT 2013
ENVIRONMENT

Ref. 13/01605/OUT

Name [redacted]

Address 38 Moorend St, GL53 0EH

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Yes. It would be nice to have more houses with shops, GP surgery, a care home and a primary school. I think that this could be a deaf community, because, here, in Cheltenham, there is no deaf community. It would be a good idea that there should be a deaf community in Cheltenham in the future. The old surgery, next door to Waterford Court, will be closed (I have been told by your council) and will move to the new one in Leckhampton Green Fields.

BUILT
Ref. 13/01605/OUT
Recd 18 OCT 2013
ENVIRONMENT

Name [redacted]

Address 42 Waterford Court
Moorend Park Road
Cheltenham. Glos. GL53 0LA

BUILT

Recd 10 OCT 2013

13/01605/OUT

ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE

Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Pleas do not build on our precious green spaces - they will be gone FOREVER. These areas are what make living in this area good. People use them for recreation & me contact with nature improves our quality of life. These green spaces improve our air quality. The [redacted] main Rd is already overwhelmed with traffic - at standstill during peak times. There are already not enough second school places for children in the area - to build more houses would put an impossible strain on poor resources.

Ref. 13/01605/OUT

Name [redacted]

Address 67, Moorend Park Rd, Cheltenham. GL50 2LG

BUILT

Recd 18 OCT 2013

ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE

~~13/01605/OUT~~ - **Official End Date 18th OCTOBER (BUT probably to January 2014)**

Comments & Observations on 650 House Application on Leckhampton Green Fields

I object to this application because:

(1) The increase in traffic would grid lock roads.

(2) The loss of open green space would be detrimental to wildlife.

(3) These fields are used by many for recreation.

(4) Once built on, this green open space would be lost forever.

(5) Almost no local people want this development to go ahead. If it does, all faith in local democracy will be destroyed. Why bother to vote?

Ref. 13/01605/OUT

Name [redacted]

Address 67, Moorend Park Rd.
Cheltenham. GL53 0LG.

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

The Transport / traffic model needs to be available before a decision can be made — both ratio used for the model have be vastly over estimated.

Rec'd 18 OCT 2013
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Ref. 13/01605/OUT

Name [redacted]

Address 4 Justicia Way
Cheltenham

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

This application appears to affect Green Belt land, and also Smallholdings, so it is also productive land.

Air pollution levels are already high in the area and this will add to them.

Bus services to this area are poor with an infrequent daytime service and nothing in the evenings - unless this is addressed, the existing roads will have little to cope with the extra traffic.

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Recd 18 OCT 2013
ENVIRONMENT

Ref. 13/01605/OUT

Name [redacted]

Address 24C MOOREND ROAD, LECKHAMPTON
CHELTENHAM GL53 0HD

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Totally disproportionate.
Congestion already on Shurdington Rd every morning is terrible.
We need the greenbelt around this heavily populated area.
Who is going to live in these homes?

BUILT
Rec'd 18 OCT 2013
ENVIRONMENT

Ref. 13/01605/OUT

Name [redacted]

Address 2 Kerelaw Gdns GL53 0JW.

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Leckhampton does not have the infrastructure for 650 Houses. Shurdington Rd is now a very busy road and extra cars would make it far worse. Church Rd is not made for any extra Traffic. Public transport would be needed for people to go to a surgery & School, and this will add to traffic problems. The area is a haven for wildlife and should be kept this way

BUILT
Recd 18 OCT 2013
ENVIRONMENT

Ref. 13/01605/OUT

Name [redacted]

Address 3[illegible] Old Bath Rd
Leckhampton

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

APART FROM THE LOSS OF GREEN LAND -
A DEVELOPMENT OF THIS SIZE WOULD SWAMP
THE LOCAL AREA TO THE DETRIMENT OF
ROADS AND OTHER FACILITIES

BUILT
Recd 18 OCT 2013
ENVIRONMENT

Ref. 13/01605/OUT

Name [redacted]

Address 16 HALL RD

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

BUILDINS ON GREEN BELT LAND SHOULD NOT BE ALLOWED BY ANY PARTY THERE IS PLENTY OF BROWN SITES MY ADDRESS IS MOORLAND PK RD (RAT RUN) DON'T ADD TO THE PROBLEM

BUILT
Recd 18 OCT 2013
ENVIRONMENT

Name [redacted]

Address 44 MOORLAND PK RD

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

- Current roads would be unable to cope with the increase in traffic. What are current pollution levels? Would these be exceeded
- More traffic = more accidents !!
- Where are the jobs for these people? The schools - secondary as well as primary
- ~~Where are~~ What figures are used to predict population increases?

BUILT
Recd 18 OCT 2013
ENVIRONMENT

Ref. 13/01605/OUT

Name [redacted]

Address 85 CHURCH ROAD

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LAN 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I drove to a meeting yesterday from my home on Leckhampton Rd, down Shurdington Rd, to Golden Valley. The traffic was gridlocked from the roundabout near Morrisons, Hatherley, all the way to Norwood Arms Roundabout, at 08:30 am.

I dread to think how much worse this would be with another 650 houses nearby. No doubt many would be travelling on the same route at this time.

With a daughter at Bournside and another @ Naunton Park, I worry about school capacity too. This needs careful consideration.

Name [redacted]

Address 69 Leckhampton Rd, Cheltenham

BUILT ENVIRONMENT
Rec'd 18 OCT 2013
Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

With reference to Planning application (Ref. 13/01605/OUT)
We would like to make the following points:

- With the closure of Kidnappers Lane many more vehicles will exit onto the Shurdington road.
- This road network needs careful revision & traffic modelling.
- Air pollution levels are too high
- There are problems with senior school places - no plans for expansion for Balcarras & Bournside.
- All planning for transport the environment and population should be revised by JCS - this application is premature.

Name [redacted]

Address 10 Fairfield Park Rd
Cheltenham GL53 7PQ

Ref. 13/01605/OUT
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PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

TOO MANY HOUSES FOR INFRASTRUCTURE AND USING TOO MUCH GREENSPACE.
FIGURES CHANGE - WHY ARE NUMBERS THREE TIMES HIGHER THAN 2011 CENSUS?

BUILT
Recd 18 OCT 2013
ENVIRONMENT

Ref. 13/01605/OUT

Name [redacted]

Address 13 HILAND RD

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

TWO MAIN CONCERNS:

1. PROPOSAL FOR ALLOTMENTS IN THE SOUTH CORNER OF LGF MEADOW (STRATEGIC OPEN SPACE). A POND APPEARS HERE IN WINTER & SPRING AND IS A LOCAL FEATURE. CAN THIS BE INCORPORATED INTO THE PLAN?

2. TRAFFIC FLOW ALONG KIDNAPPERS LANE, FARM LANE & LECKHAMPTON LANE. MY MAIN CONCERN IS THAT CURRENT PLANS ARE TOO RESTRICTIVE. WE LIVE IN VINERIES CLOSE AND WOULD HAVE PROBLEMS REACHING MONMOUTH FOR EXAMPLE.

BUILT
Recd 18 OCT 2013
ENVIRONMENT

Ref. 13/01605/OUT

Name [redacted]

Address 1 VINERIES CLOSE, LECKHAMPTON GL53 0NU

BUT
Recd 18 OCT 2013
ENVIL

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

CBC is rushing this through! The majority of local people do not want to lose these well used & loved spaces. Local roads have already been described as 'over capity' - the extra vehicles from the proposed development will make things even worse than they are & air pollution levels, that already break EU levels in winter on my road, will increase. We are in an Air Quality Management Area - it should not be allowed to get worse! A route I regularly use - Kidnappers Lane v Church Rd will be closed & approx. 1000 extra vehicles will exit onto Shurdington Rd. This application is premature! It should not go before the planning committee before the JCS is finalised. All aspects of planning, transport, environment & population estimates in the housing targets should be verified before the application goes before the planning committee.

Name [redacted]

Address 79 Church Rd, GL53 0PF

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Building on this land is reckless.....
- There are insufficient secondary school places already.....
- Traffic is already over capacity on Shurdington Road, and pollution above EU levels.....
- This is valuable greenbelt land. Its loss is irreparable.....
- Increased risk of flooding - the last consultation was flawed and incomplete.....
We don't need so many new houses. It will have a reckless effect on housing prices.....

Name [redacted]

Address .....11 Highwood Avenue GL53 0JT

Ref. 13/01605/OUT
Recd 18 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LAN
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

HOW MANY MORE TIMES

NO!

BUILT
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ENVIRONMENT

TO DEVELOPMENT ON THIS SITE

Name [redacted] N AT 35 BOURNSIDE ROAD IN 1957.

Address 34A PILLEY LANE
GLS3 9ER

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I am very concerned about this proposal. As it stands I cannot enjoy the use of my garden which is parallel to Morrisons Super Market due to the noise pollution from traffic. This proposal will inevitably mean more traffic and I am concerned about the strain on the local schools, doctors and other facilities. Obviously there is the other important issue of this development spoiling the beauty of Up Hatherley. I bought my house which has views of the fields believing that these fields [redacted] to be secure protected. I am very saddened and cannot see this proposal as necessary or sensible

Name [redacted]

Address 27 THE GREENINGS
CHELTENHAM

Ref. 13/01605/OUT

BUILT
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PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

What worries me is all traffic coming through Bath rd. The Council has made a bottle neck there and it often ends up forming a back log and many irate drivers. Who are these houses for? enough is enough people move to the country only to find the town follows them. Immigrants will end up in these homes as the rest of us have no say we do. not count, let Tewkesbury Council build on there side extend there town, Cheltenham & Gloucester will meet & not a green field in sight (DISGUSTING)

Name [redacted]

Address Myrtle Cottage Croft st.

BUILT
Ref. 13/01605/OUT
Recd 18 OCT 2013
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PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

- Insufficient senior school places now, both Balcarras and Barnside have no plans to expand but catchment areas may have to change to accommodate new development.
- extra large number of vehicles on Shurdington Road causing an already severly congested route lox worse.
- Loss of much loved green spaces, this area will change forever and we have chosen to live here.

BUILT
Recd 18 OCT 2013
ENVIRONMENT

Ref. 13/01605/OUT

Name [redacted]

Address 5 merlin way

CANNOT RECORD - INCOMPLETE ADDRESS

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Please consider:

- Wait for the parish (council) application for Local green Space status.
Don't lose our heritage.
- Consider the road network around this site: it is already failing
Air pollution levels!
- secondary school spaces

BUILT
Rec'd 18 OCT 2013
ENVIRONMENT

Name [redacted] Ref. 13/01605/OUT

Address Roslyn Moorend Grove
Cheltenham GL53 0EX

NOT RECORDED - ADDRESS NOT FOUND

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

To consider building on Leckhampton green fields is utterly ridiculous. The existing traffic problems, infrastructure and congestion would be ruinous.

BUILT
Recd 18 OCT 2013
ENVIRONMENT

Name [redacted]

Address LYNMEAD, CHURCH RD

Ref. 13/01605/OUT

BUILT
Recd 17 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Leckhampton is the last green space outside an already overcrowded town. The fields provide a local amenity for dog walking, allotments and the pleasure of open, green space, a respite from the stresses of our urban existence. This is apart from the wealth of wildlife which is not inconsiderable. Rare and threatened species of birds are resident there, as well as bats and hares. The very real threat of flooding, which move land under concrete would raise, must be a serious consideration as well. What advantage could there be apart from gain for the developers?

Name [redacted]

Ref. 13/01605/OUT

Address Brook Cottage, Coppetts Lane, Leckhampton. GL51 4HT.

BUILT
Recd 17 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

The application is premature since many of the planning assumptions in the SCS are unverified, and cannot be supported by credible data or evidence at this time. Additionally, the local road network - especially Church Road and Shurdington Road - is already heavily congested and no viable means of expanding capacity or reducing traffic volumes is being considered in this application. Furthermore, the green fields are home to numerous species of flora and fauna, including bats, several of which are ~~be~~ considered protected species. We strongly oppose this application.

Name [redacted] Ref. 13/01605/OUT

Address 11 VINERIES CLOSE, LECKHAMPTON, GL53 0NU

Rec'd 17 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

> APPLICATION IS PREMATURE
> SHOULD WAIT UNTIL JCS HAS BEEN FINALISED
> ALL ASPECTS OF PLANNING, TRANSPORT, ENVIRONMENT & POPULATION ESTIMATES CONTAINED IN THE HOUSING TARGETS HAVE BEEN VERIFIED

Name [redacted]

Address 11 FAIRFIELD WALK, GL53 7PF.

Ref. 13/01605/OUT

RECEIVED
17 OCT 2013
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PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Too many houses, need to keep some Green Space
Roads cannot/will not cope with estimated additional vehicles
Risk of flooding

Name [redacted]

Address 62 Sandy Lane, Cheltenham

Ref. 13/01605/OUT

17 OCT 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I continue to express my disapproval of this application as the local infrastructure is inadequate to cope with this volume of houses, and yet another tract of countryside & agricultural land (which is likely to be much needed in the future) will disappear under concrete. I understand that future projections of population increase may be unrealistic (over-estimates)

Name [redacted]

Address 9 Hobbs Chase Cheltenham GL53 0LP

Ref. 13/01605/OUT

BUILT
Recd 17 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

- Church Road is far too busy already. We find it hard getting out our drive
- Many residents, including us, walk their dogs or walk daily on these fields.
- Many people use these fields to run and play in the winter with their children.
- Removing the fields in Leckhampton removes the desire to live in Leckhampton.
- Redevelop disused sites first. Green should be last.
- What demand is there for these houses and why?

Name [redacted] Ref 13/01605/OUT

Address 65, Church Road GL53 0PF

BUILT
Rec'd 17 OCT 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

NON SUSTAINABLE DEVELOPMENT, WHERE ARE ALL THE JOBS FOR THESE PEOPLE. MOST WILL BE AT KINGSDITCH T/A SO BUILD ON THE TEWKESBURY ROAD. NEAR BY.

SHURDINGTON R^d CANNOT TAKE ANY MORE TRAFFIC

FIGURES USED FOR POPULATION INCREASE ARE FLAWED AND OVERSTATE POPULATION INCREASE.

Name [redacted]

Address NAMBOUR, FARM LANE, LECKHAMPTON.

Ref. 13/01605/OUT

BUILT
Recd 17 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

1/ This application should not go before the planning committee until the Joint Core Strategy has been finalised

2/ Shurdington Road already has too much traffic and does not have the capacity for the extra 1,200 vehicles likely to be using it

3/ Air quality - already breaching EU levels - will deteriorate further

Name [redacted]

Address 23 HIGHWOOD AVENUE, GL53 0JJ

Ref. 13/01605/OUT

BUILT
Recd 17 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

When the Green Field principle and legislation was introduced all those years ago it was highly prized by the majority.

Before there is any more to encroach on Green Fields there is a lot of Brown Field areas not yet developed. Costs of cleaning them up should not be a barrier to sorting out such problems.

Name [redacted]

Address

Ref. 13/01605/OUT

BUILT
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ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE
13/01605/OUT - Official End Date 18th ~~OCTOBER~~ (BUT probably to January 2014

Comments & Observations on 650 House Application on Leckhampton Green Fields

1. THE ADDITIONAL TRAFFIC CANNOT BE SAFELY ACCOMMODATED AND WILL CREATE A DYSFUNCTIONAL, OVER-USED ROAD NETWORK, AND ADD SIGNIFICANTLY + DANGEROUSLY TO THE HIGH AIR POLLUTION LEVELS (WHICH ALREADY BREAK EU LEVELS IN CHURCH RD + A46). THE ESTIMATED ADDITIONAL 1000 CARS WILL EXIT ONTO A46 WHICH DOES NOT HAVE CAPACITY.
2. INSUFFICIENT SENIOR SCHOOLS + OTHER LOCAL RESOURCES.
3. THE SMALL-HOLDINGS ARE A WONDERFUL + PRODUCTIVE GREEN SPACE WHICH CAN NEVER BE REPLACED ONCE GONE. THE WHOLE AREA IS AN EXCELLENT GREEN RESOURCE FOR LOCAL PEOPLE OF ALL AGES. IT MAINTAINS A SPACE BETWEEN HOUSING WHICH CANNOT BE RECREATED.
4. I OBJECT STRONGLY TO THIS APPLICATION; WHICH IS PREMATURE AND SHOULD NOT BE CONSIDERED UNTIL THE JCS IS FINALISED + UNTIL OTHER FORECASTS HAVE BEEN VALIDATED.

Name [redacted]

Address [redacted]
87 CHURCH RD, LECKHAMPTON
GL53 OPF.

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

The additional traffic from the proposed development on the above green fields will be disastrous. Already vehicles are regularly "nose to tail" travelling at a snail's pace.

BUILT
Rec'd 17 OCT 2013
ENVIRONMENT

Name [redacted]

Address 8 ARDEN ROAD
Leckhampton
Cheltenham GL53 0HQ

Ref. 13/01605/OUT

15.10.2013

PLANNING
Rec'd 16 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I need some houses built for my nine Grandchildren in their twenties. Plenty of room on the Leckhampton fields

Name [redacted]

Address 11 Gordon Road

Ref. 13/01605/OUT

BUILT
16 OCT 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Since moving to this area six years ago, I have seen a huge increase in traffic along Shurdington Rd + Church Rd. Nearly every day, cars, vans + lorries have to mount the pavement - one day a pedestrian (probably a schoolchild) will be injured. Making the air pollution problem worse on these 2 roads is already breaking EU laws - to deliberately increase this seems criminal. More thought needs to go towards these problems

Name [redacted]

Ref. 13/01605/OUT

Address GORRAN HAVEN
KIDNAPPERS LANE
CHELTENHAM. GL53 ONX

BUILT
16 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Is nothing sacrosanct these days? Building on Green Belt land will change the whole atmosphere of this beautiful area. Promises from our councillors obviously mean nothing. What has happened to democracy? We had one expectedly to believe our councillors who we elected. One wonders where all these people will work, find school places, congest our already overcrowded roads and seriously pollute the air we breath. It seems we no longer live in a democracy.

Yours

[redacted]

Name

Address 4 LECKHAMPTON FARM COURT
CHELTENHAM
GL51 3QS

Ref. 13/01605/OUT

BUILT
Recd 16 OCT 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

This application must be declined for the following reasons –

(1) The preservation of existing Green belt is critical for the continuing quality of life for current residents and the wildlife that live in it.

(2) Cheltenham infrastructure, particularly road networks, is unable to support housing expansion

(3) Schools in the area are full and further pressure on stressed NHS services will mean less availability for all.

Name [redacted] Ref. 13/01605/OUT

Address 6, James Way, St Marks Cheltenham GL51 3HZ.

BUILT
Recd 16 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

ROADS & INFRASTRUCTURE UNABLE TO COPE.
IT'S A DISGRACE. I DO NOT AGREE WITH USING
GREEN LAND WHEN THERE ARE AREAS IN TOWN
THAT NEED REDEVELOPING AND CAN TAKE HOUSES

CARS WILL HAVE NO WHERE TO GO. JAMS.
CHELTENHAM & GLOS ARE APPALING ALREADY

Name [redacted] unreadable record - incomplete address

Address GL53 7PP

Ref. 13/01605/OUT

BUILT
Recd 16 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably ~~to January 2014~~)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Is this what the Lib Dems promised? We have already too much intrusion into our green spaces. You have allowed the Brown Field Spaces to be used for so called luxury housing. There is already too much building in Leckhampton. There are few amenities & you are only going to cause more travel more cars, journeys, more pollution, more traffic on already busy roads. Do not expect us to vote for you, to you false promises again.

[redacted]

Name [redacted]

Address [redacted]

Ref. 13/01605/OUT

BUILT
Recd 16 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KEDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I object to the planning application (above).

- During 'peak' rush hours roads around Shurdington Road, Hatherley Lane & especialy to the A40/Gloucester Road/ Hatherley Lane roundabout are 'maxed out' chaos with too many cars which only get worse.
- Where will all the 'extra secondary school age children go to school ?? insufficient spaces which will cause problems.
- The application is premature, you should wait until the joint core strategy for the area has been finalised. You also need to verify all aspect of planning, transport, environment & population estimates contained in the housing targets have been verified.

Name [redacted]

Address 7 Hidcote Ave. GL51-3FB

Ref. 13/01605/OUT

BUILT
16 OCT 2013
COMMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Traffic:- Shurdington Rd. is an over-busy road already. One small holdup:- ie repairing a small pothole - produces massive tailbacks and delays. I know because I use the road every day. It is a small road we over-used.

Housing:- Building more houses means they have to be filled - bringing more people in to Cheltenham is folly - we have not got enough good secondary schools; surgeries; adequate road systems etc. Our A+E has had to be closed at night because it can't cope with the number of people already here - how do we propose to deal with this great influx? And what about all the unsold properties in Chelt.

Greenfields:- The great attraction of Chelt. is its beauty - especially of our surrounding areas. If we are going to wipe out our close & lovely countryside we will be reduced to just another urban area with nothing special to attract tourists (part of our revenue!)

Name [redacted]

Address 59 The Park

Ref. 13/01605/OUT

BUILT
Recd 16 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION, KIDNAPPERS LANE
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Building on this land will be disastrous.

(1) Green Belt land is valued, valuable and should be preserved

(2) The A46 is overused already.

(3) The Bath Road cannot take any more traffic.

(4) Doctors' lists are full

(5) Schools are full

(6) Air pollution is critical

(7) No surplus of jobs in Cheltenham

(8) Danger of flooding.

Name [redacted] Ref. 13/01605/OUT

Address 34 CAMPION PARK, UP HATHERLEY GL51 3WA

BUILT
Recd 16 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I write to object to the development of this area. The Application is premature and should not proceed until the outcome of the Joint Core Strategy has been finalised. Also all aspects of planning, transport, environment issues and population estimates must be verified.

This area cannot support any further development as Shurdington Rd and Church Road are already very congested at peak times and additional traffic will create gridlock. This will add to the air pollution which is already breaking air quality levels.

The senior schools are oversubscribed & Doctors Surgeries are working over capacity.

Ref. 13/01605/OUT

Name [redacted]

Address 2 Azalea Drive GL51 3EA.

15/10/13

CULT
16 OCT 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

DOES NOT

Against the above as Cheltenham doesn't have the infrastructure to support the resulting population increase and green areas will be lost forever

Name [redacted] Ref. 13/01605/OUT

Address 7 EDWARD WILSON VILLAS
GL50 2LP

BUILT
Rcvd 16 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

- The roads near the development would be overloaded — Shurdington Road, because that is to be the only entrance/exit, and Leckhampton Lane - Church Road, because vehicles passing through would be avoiding Shurdington Road
- The added traffic would add to the already excessive levels of air pollution
- There are insufficient senior school places to accommodate the likely number of pupils. Bussing them to more distant schools would be inefficient & inconvenient to parents & would add to pollution

Name [redacted]

Ref. 13/01605/OUT

Address 20 Colwyn End Rise

BUILT
Recd 16 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I disagree with building these houses because it A thousand extra vehicles will all EXIT onto Shurdington Rd. :- Air Pollution levels already break EU levels in the winter months on Church Road and A46.

Name [redacted]

Ref. 13/01605/OUT

Address FAIRLEIGH. FAIRFIELD RD
GL53 7PD

BUILT
Recd 16 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

THIS DEVELOPMENT WOULD BE TOTALLY UNSUITABLE.
AS A FREQUENT USER OF SHURDINGTON ROAD
IT IS OBVIOUS THAT IT CANNOT ACCOMMODATE
SUCH AN ENORMOUS INCREASE IN TRAFFIC, AS
SUCH A DEVELOPMENT WOULD BRING.

ALSO, THE EXISTING SENIOR SCHOOLS IN THE AREA
ARE ALREADY OVER-SUBSCRIBED. THE PLANS & NUMBERS
INVOLVED MAKE LITTLE OR NO ALLOWANCE FOR THIS.

Name [redacted]

Ref. 13/01605/OUT

Address 5 NAUNTON WAY
CHELTENHAM
GL53 7BQ

BUILT ENVIRONMENT
Recd 15 OCT 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

CHELTENHAM IS RAPIDLY BECOMING A DORMITORY TOWN. LACK OF WORK AT PRESENT, WITH LITTLE HOPE FOR THE FUTURE IS CAUSING OVER POPULATION OF THE AREA. FIRSTLY, CHECK FOREIGN PEOPLE ALLOCATED COUNCIL PROPERTY. RESTRICTING THESE TO YOUNG PEOPLE WHO HAVE GROWN UP IN THE DISTRICT/AREA.

THE LAND SOUTH AND SOUTHWEST OF KIDNAPPERS LANE SHOULD NOT NOW, OR ANYTIME IN THE FUTURE BE BUILT ON, DESTROYING THE LOWER SLOPES OF LECKHAMPTON ESCARPMENT. LIKEWISE THE AREA BETWEEN CHARGROVE LANE/HATHERLEY WAY SHOULD BE KEPT OPEN. IF YOU ARE HELL-BENT ON THIS THEN I SUGGEST YOU BUILD THESE HOUSES IN PITTVILLE PARK, SANDFORD PARK, + MONTPELLIER GARDENS. I WONDER WHAT THE POPULAS WOULD THINK OF THAT.

Name [redacted]

Address GL53 9DA.

Ref. 13/01605/OUT

BUILT
Recd 15 OCT 2013
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PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Brownfield sites should be developed before any green land is gobbled up.
Traffic will be a nightmare.
Weekly there are pages & pages of homes for sale!!

Ecologically development will be a disaster.
Natural wildlife habitat is already disappearing at an alarming rate.

Name [redacted]

Address Karoo Cottage GL53 0QT.

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

SHEER AND UTTER MADNESS, TAKING AWAY THE GREEN BELT AND BUILDING HOUSES UP AGAINST AN ALREADY OVER BURDENED SHURDINGTON RD, AND BATH RD IS UTTER STUPIDITY AND GREED ON BEHALF OF TFINKES BORO COUNCIL AND DEVELOPERS. EVEN THE LIB DEMS NEED THEIR ARSES KICKED WE WILL FIGHT THIS DEVELOPMENT TOOTH & CLAW.

Name [redacted]

Address GORDON RD, LECKHAMPTON

BUT
Ref. 13/01605/OUT
Recd 15 OCT 2013
ENVIRONMENT

BUILT
Recd 15 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

MY OBSERVATIONS ARE THAT THE LIB DEMS ARE TRYING TO RUSH THIS THROUGH WITHOUT HAVING MADE SURE THAT ALL THE CRITICAL CHECKS HAVE BEEN UNDERTAKEN. IE BROWNFIELD FIRST POLICY SHMA REPORT VARIFICATION OF THE JCS POPULATION PROJECTION. THE INFRASTRUCTURE & ROADS CAN NOT HANDLE THE EFFECTS OF THIS PROPOSAL.

Name [redacted] Ref. 13/01605/OUT

Address 35 WESTBURY RD
CHELTENHAM
GL53 9EN

BUILT
Recd 15 OCT 2013
ACTION REQUIRED

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

TRAFFIC !

THE TRAFFIC CREATED BY 'ENDSLEIGH' IS BAD MORNING + EVENING

TRAFFIC ENTERING 'TOWN' TURNS LEFT AT THE SHURDINGTON RD MOORENT ROAD PARK RD + FROM 8 AM TILL 10 am TO AVOID BATH RD (Junction) WITH LECKHAMPTON RD (ROUNDABOUT WITH 4 OR 5 SIDE ROAD) 2 PEDESTRIAN CROSSING + SETOF LIGHTS AT THIRLESTAINE RD IT THEN 'RACES DOWN THE PARK WITH SCANT REGARD FOR "30" LIMIT TO JUNCTION WITH GRATTON RD AT PARK PLACE + BUS ROUTE

Name [redacted]

Address 6 THE PARK

Ref. 13/01605/OUT

SCHOOL CHILDREN !

IT CAN ONLY BECOME WORSE !

WORSE SINCE PARKING ALLOWED IN PARK PLACE

BUILT

Rcvd 15 OCT 2013

ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

This application is premature, and should not go before the Planning Committee until the Joint Core Strategy for the area of Cheltenham, Tewkesbury and Gloucester City has been finalised. Also that all aspects of planning, transport, environment and the population estimates contained in the housing targets have been verified.

[redacted]

Name

Ref. 13/01605/OUT

Address 4 CHARNWOOD ROAD, CHELTENHAM GL53 0HJ

BUILT
Recd 15 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

We are completely against these proposals which would remove vital green space traffic which is already overloaded down Shurdington Rd would be unbearable, there are already insufficient secondary school places. There are far better options & the leaving development plan should not be driven by the developers desire to maximise their profit at the expense of the people who live here already and the people that would buy their houses and be caught in the subsequent problems also.

Name [redacted]

Address 12 Moorend Rd GL53 0EU [redacted]

0.13

BUILT
Recd 15 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Building this number of houses on Leckhampton Green Fields would make a mockery of any Green belt. It would be utterly dishonest to cater for more incomers, when present educational, medical & other facilities are stretched to the limit already and job vacancies have fallen dramatically; apart from permanent overloading of the present road usage & facilities.

Whatever solution one found to road & transport problems once Green land is built on it has gone forever, not able to be used for food production — have you succeeded in making concrete fertile & providing food? Therefore would you survive?

Name [redacted]

Ref. 13/01605/OUT

Address 25 Peregrine Rd. Cheltenham.

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

1. The plans do not yet satisfy the requirement to demonstrate a viable transport strategy. Roads around Moorend Park Road, Hall Road, are already used as 'rat runs' for traffic. The new houses must not make this situation worse.

2. The effect on existing secondary schools must be considered and planned for.

RECEIVED
15 OCT 2013
ENVIRONMENT
Ref. 13/01605/OUT

Name [redacted]

Address 12 MOOREND GROVE, GL53 9EZ

BUILT

Rec'd 14 OCT 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

We wholeheartedly agree with and support the views of LEGLAG issued in various documents over past years. It is most disappointing to us to realise that 'authorities' which are elected to represent our wishes continually ignore them. The case against proposed significant developments of housing by LEGLAG is balanced, objective and totally justified.

There can be no reason why all the matters raised should not be considered in detail BEFORE ANY ACTION IS TAKEN FOR FURTHER HOUSING AND RELATED DEVELOPMENTS IN THE LECKHAMPTON AREA.

Name [redacted]

Address 89 MOORENDS RD, LECKHAMPTON GL53 0HB

Ref. 13/01605/OUT

12/10/2013

BUILT

14 OCT 2013

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PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

1. TOO MANY HOUSES ALREADY WITH NO ADDED FACILITIES - SCHOOLS - SPORT & PLAYFIELDS DOCTORS ETC

2. CHELTENHAM COUNCIL ALREADY DO NOT ATTEND TO THE GREENERY ADDED TO ESTATES THEIR REQUIREMENT - WOLVERHAMPTON COUNCIL DOES ONE END OF ROSEHIP COURT - CHELTENHAM COUNCIL DOES NOTHING AT THE OTHER OR LOTS OF OTHER AREAS JUST ON THIS ESTATE - THATS JUST ONE THING

Name A Pibhall

Address 27 ROSEHIP COURT
GL51 3WN

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

THE INFRASTRUCTURE WILL NOT COPE WITH ALL THESE HOUSES, + SCHOOL, RETAIL OUTLETS ETC.
IF THERE IS AN ACCIDENT ON THE M5 OR AT THE AIR BALOON, ALL TRAFFIC IS REDIRECTED DOWN SHURDINGTON ROAD; AND IT BECOMES GRIDLOCKED THE SAME AS ON RACE DAYS.

THERE IS THE STRONG POSSIBILITY OF INCREASED FLOODING. WHERE I LIVE ADJACENT TO THE SHURDINGTON RD. PROPERTIES ALREADY FLOOD FOLLOWING A COUPLE OF DAYS OF HEAVY RAIN.
WHAT WILL HAPPEN WHEN THERE IS A CONCRETE JUNGLE OVER THE ROAD. THE DRAINAGE SYSTEM WILL NOT COPE.

WILDLIFE IS BEING LOST - DEERS, BATS, RARE BUTTERFLIES, BADGERS ETC ALL LIVE IN THOSE FIELDS.

IT APPEARS JCS HAS FOLLOWED INACCURATE POPULATION/ECONOMIC GROWTH PREDICTIONS.
UP-TO-DATE FIGURES SUBMITTED BY INDEPENDANT CONSULTANTS NEED TO BE LOOKED AT.
WE ONLY HAVE ONE SEWERAGE PLANT FOR CHELTENHAM/HOW IS THIS GOING TO COPE.

WHAT IS THIS "AFFORDABLE HOUSING" GOING TO COST - THE DEVELOPERS CANT TELL US. WHO IS GOING TO AFFORD THIS HOUSING IN THESE DAYS OF RECESSION, WHEN HOMES ARE BEING REPOSSESSED.

WE HAVE ENOUGH HOUSES EMPTY IN CHELT. NOW. WE DONT NEED THESE !!

Name [redacted]

Address 21 HAWKSWOOD RD CHELTENHAM.

BUILT
Recd 14 OCT 2013
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Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

We dont need the houses or the extra traffic, noise and pollution generated from them.

Also flooding is a concern for those living towards Shurdington/Moorend/Park area.

We need more green fields, open space, quiet and conservation of our precious countryside.

Recycle inner city wasted space first

Name [redacted]

Address 51 Highwood Avenue GL53 0JJ.

BUILT
Rec'd 14 OCT 2013
ENVIR. ENT

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

TRAFFIC PROBLEMS
BATHRD CONGESTION
BATHRD CAR PARK INADEQUATE
AT TIMES NOW

BUILT
Recd 14 OCT 2013
ENVIRONMENT

Name [redacted]

Ref. 13/01605/OUT

Address 2 JASMIN WAY
UP HATHERLEY

BUILT

Recd 14 OCT 2013

ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

None of the infrastructure is in place, or put in place by this application. The proposals would bring misery to current residents in the area, and would not be a happy place to live for incomers either.

The road system, schools, jobs, & the environment are all under resourced for the proposed influx of people.

The application should delay until the JCS is in place.

Name [redacted]. 13/01605/OUT

Address [redacted]

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

My Concern is primarily about the extra traffic on the roads - Shurdington Road, Church Road & Grovefield way Quite often the roads are congested now and we have had to wait for road surfaces to be repaired. Parking at Supermarkets - such as Morrisons is already at capacity at weekends and I am concerned that additional cars will have a bigger impact than has been considered.

I would also say that we should be encouraging people to use bicycles & to walk where possible - this will be more hazardous

Name [redacted]

Address 23 Amaranth Way

BUILT
Recd 14 OCT 2013
ENVIRONMENT

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

BUILT ENVIRONMENT
Recd 14 OCT 2013

An outrageous proposal which will soon turn an already overtrafficed area into a London exit road at peak hours. Church road is already a rat run from the A40 to Charlton Kings and beyond, Kidnappers lane is hardly manageable as it is and the impact of increased traffic on the increased pedestrian population is a blue print for more road traffic accidents.

Name [redacted]

Address Arden Road, Cheltenham

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

IN TOTAL AGREEMENT WITH ALL LEGLAG'S

OBJECTIONS TO JCS BUILDING PLAN

FOR LECKHAMPTON

BUILT
Rec'd 14 OCT 2013
ENVIRONMENT

Name [redacted]

Address EMMANUEL GDS
GL53 7NT

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

THINK ABOUT THIS HARD BEFORE YOU DO IT! YOU CANT REPLACE GREENBELT ONCE IT GONE ITS GONE! THERE ARE FLOOD FIELDS WATER COMING OFF LECKHAMPTON HILL STOPS AT THESE FIELDS WILL COUNCIL GIVE US INSURANCE AGAINST FLOODING IF WE CANNOT GET IT IN FUTURE. THINK ABOUT DRINKING WATER, SHORTFALL, SEWAGE WE ONLY HAVE HAYDEN LANE: TRAFFIC, EMERGENCIES ACCESS, HOSPITAL WITH NO A.E. THINK ABOUT SCHOOLS ELE GAS BLACKOUT, DR ALREADY IN SHORTSUPPLIE, RATRUNS THROUGH WARREN HILL SAISBURY AVE, HAWKSWOOD RD, LICKFIELD CT. WHAT ABOUT WILDLIFE IN THESE FIELDS ONCE THERE LOST THERE LOST THERE ARE THOUSANDS OF HOUSES ON THE MARKET JUST GO TO ANY ESTATE AGENT IN GLOS WHY DO WE NEED MORE BUILD ON LAND ALREADY BUILT ON IE OLD SPIRAX I SHAW IF YOU LOOK YOU COULD FIND LOTS OF EMPTY LAND IN CHELT. LEAVE ARE FIELD ALLOWN.

Name [redacted]

Address 23, HAWKSWOOD ROAD WOODLANDS.

Ref 13/01605/OUT

Recd 14 OCT 2013

ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

We have lived on this side of Cheltenham for 30 years and seen a great deal of development involving the loss of a vast amount of green open space in that time. This scheme seems designed to deprive us of most of what we have left. Where is the supposed preference for redeveloping brownfield sites? 'Consultation' is a sham if, in the end, no notice is taken of the views of existing residents - our local council is not serving us well.

Name [redacted]

Address 35 The Park
Cheltenham

BUILT
Recd 14 OCT 2013
ENVIRONMENT

Ref. 13/01605/OUT

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Rcvd 18 OCT 2013
ENVIR

5 Blackthorn End

Leckampton Lanes

Cheltenham GL53 0QB

14th October 2013

mikeandgillbell@BTINTERNET.COM

Cheltenham Borough Council Planning Department

Municipal Offices

Promenade

Cheltenham GL50 9SA

I wish to make the following comments on the planning application **13/01605/OUT** for 650 houses and other developments on Kidnappers Lane in the south of Cheltenham.

- The application is premature. It must be delayed until the acceptance of the JCS.
- The proposed new developments will put extra traffic onto the already full Shurdington Road. The outline illustrative master plan apparently closes access to Leckhampton Lane/Church Lane. This will funnel traffic onto Shurdington Road both from the new estate and the existing Brizen Estate. This will be in excess of 1000 cars per day. The access from the estate onto Shurdington Road will require a large junction (either a roundabout or a major traffic light complex). The position indicated on the indicative plan is too small and too near the existing Moorend Road traffic lights.
- Despite the lengthy consultant's report the application does not address the issue of flooding adequately. The consultant's report is based essentially on computer modelling and uses little or no data based on measurements on the site. It also takes little or no account of resident's observations. The 2007 flooding caused one metre deep water to run across Church Road onto the proposed estate and three metre deep flooding at Brook Cottage. The balancing ponds shown on the plans and virtually surrounding Brook Cottage are designed to accommodate the extra surface water runoff from the proposed new estate. They will be inadequate to cope with a repeat of the 2007 flood where large volumes of water flowed onto and across the area. The position of the balancing ponds is quite unacceptable so near to Brook Cottage.
- There are number of significant differences within the Planning Application Documents. For example the access onto Farm Lane and Leckhampton Lane is quite different in the Illustrative Master Plan and the South of Cheltenham Access and Movement Plan. The whole Planning Application Document clearly needs editing to remove these contradictions.

Yours sincerely

[redacted]

BUILT
Recd 18 OCT 2013
ENVIRONME

5 Blackthorn End

Leckampton Lanes

Cheltenham GL53 0QB

14th October 2013

mikeandgillbell@BTINTERNET.COM

Cheltenham Borough Council Planning Department

Municipal Offices

Promenade

Cheltenham GL50 9SA

I wish to make the following comments on the planning application **13/01605/OUT** for 650 houses off Kidnappers Lane in the south of Cheltenham.

- I am concerned about the implications for additional secondary school numbers. The local schools at Bournside and Balcarras are already seriously oversubscribed.
- Traffic on the Shurdington Road is already at saturation point, the additional houses and road closures will make the situation much worse. Access from the new estate onto Shurdington road will require a major new junction. The indicative junction shown in the indicative plans in much too small and near the Moorend Road traffic lights. It will be taking the traffic both from the new estate and the Brizen Estate which currently exits from Kidnappers Lane and Farm Lane/Church Road.
- The concept of a cottage hospital has to be a joke in the present situation regarding NHS services in Cheltenham. I note the outline does not include a doctor's surgery.

Yours sincerely

[redacted]

BUILT
Recd 17 OCT 2013
ENVIRONMENT

Lantern Lodge
Farm Lane
Leckhampton
Cheltenham
GLOS
GL53 0NN

Dear Mr Hemphill

30 Sept 2013

Re 13/01605/OUT

Please accept this letter as our objection to the planning application for housing to be built on the farm & small holding land adjacent to Farm Lane/ Kidnappers Lane.

As you are aware this is only part of the development originally proposed and the plans are indicating this as only the first phase, with the others phases linking into this proposal but are these outside of the Cheltenham BC jurisdiction which would mean that those developments could be approved with Cheltenham BC having no control.

There is also the issue of the developments being forwarded for Brizen Farm and the opposite side of the Shurdington Road. Having attended the exhibitions it has become clear that when talking to those holding the displays the developers have in reality only been considering their own schemes. They show reduced numbers of houses but implied that they would be building larger houses so numbers of people, traffic etc would not be reduced as they claim.

Traffic is already reaching unacceptable levels, single housing plots within the area have already been rejected on the grounds of introducing more traffic so how can large scale development be considered bringing more, traffic on to these already congested roads.

Flooding issues raised and modelled against Government / EA data appear to be totally irrelevant as it is related to the rivers, whilst this area is away from rivers these fields and the fields proposed for development are the natural flood plains for the surrounding hills, and I would not consider the hills to be a small catchment area as has been implied. I would disagree with the statement that the fields do not flood or that they were never saturated and in the previously ill conceived development of The Lanes these fields had their dew ponds filled in by methods that would probably be considered illegal fly tipping in this day and age as may have been the case back then. While you cannot accept personal property issues we suffer now as a direct result of the original Lanes development that development with our gardens constantly being flooded this was not the case before the development this is fact as I live in the house where I was born and grew up in Farm Lane, and if I recall flooding was one of the points raised in the original objections.

Leckhampton Hill is an area of outstanding natural beauty which will be totally destroyed by further development being imposed so close.

The area surrounding Leckhampton is unsustainable, no facilities exist to this area with all work areas and shopping developments being to the north of Cheltenham and that area abounds the motorway and major roads thus offering good access with less impact. The developers talk of a new doctor's surgery and cottage hospital, the surgery will be a relocation of an existing surgery which would be detrimental to Leckhampton moving it further away from the village so introducing more traffic. The cottage hospital is only going to happen if the health service would take it on and at present they are cutting services, so this is liable to be land that will suddenly become available for housing.

Control is required to prevent this developer developing on their boarders which is exactly what has and is potentionally happening to this area of Leckhampton leaving the locals then to overcome all the problems these developments caused, the truth being that the problems are not resolved only made worse, there are not the resources to cope today let alone tomorrow.

Please reject this application and any other subsequent applications to this area of Leckhampton, the land status over the years has already modified to suit outsider development needs not the needs of local people, there are other areas that can be developed without have such an impact on the life of the people and the surrounding environment. This particular development has been considerably reduced in scale but it suggests that this would be a development being built in stages so ultimately resembling the original scheme but probably in the long run just involve building houses as the Contractors profit considerably by building in Leckhampton as opposed to other areas. They talk of affordable housing but hat is not the case in this area both of my daughters have had to move out of the area as the same specification houses they now own were tens of thousands of pounds more in this area.

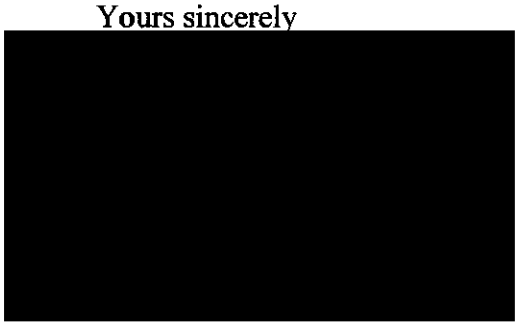
The scheme shows hedgerows being kept but this is not happened on the last two developments towards Hatherley with the existing roads being opened up that would have a tremendous negative visual impact if the developers go for subsequent amendments to do the same again if the scheme was unfortunately approved.

If this and the subsequent development applications around Farm Lane are unfortunately approved could it not be made a condition that all the new roads to the south & west of Farm Lane etc from the other developments are all brought out on to the main road at the existing roundabout on the A46 through this development and include a vehicular two way link into the existing Lanes development as was the original intention from the design of the Lanes and close any direct access to and from Farm Lane to this existing and any future developments, in this way if development takes place then it would have minimal impact on the residents of Farm Lane and the surrounding neighbourhood, and most important would probably be a great improvement on the safe access on to the main A46 This way the development could be seen to resolving issues but not at the expense of existing people. If somebody moves into this type of development then they know what to expect i.e. roads in place, but if these development are introduced and transport links put in to small country lanes i.e. Farm Lane as was the Lanes years ago then the local people have no options. Please protect what is left of Leckhampton as a village. Surely this is not what planning is all about imposing unforgiving situations to the local community which

could easily be overcome at an insignificant cost to the developers. Perhaps Farm and Kidnappers Lanes could be designated "quiet lanes" and by reducing present traffic levels to these two country lanes it could protect and reduce the damage to the village.

Please reject this application.

Yours sincerely



Willow Green
Leckhampton Lane
Shurdington
Cheltenham
Glos
GL51 4XW

BUILT
Recd 17 OCT 2013

15/10/13

Land at Leckhampton, Shurdington Road , Cheltenham. 13/01605/OUT

Dear Sir

I wish to object to the above planning application on the following grounds:

1] The A46 is a busy and dangerous road and struggles to cope with all the traffic , if this housing goes ahead chaos will ensue. An environmental statement lodged by Hunter Page a while ago admits that the highway was found to be operating near to capacity.

2] I believe that emergency services will be affected by the increase in traffic during peak times.

3] No provision for an extra Secondary School has been provided when local schools are over subscribed .

4] This land in the past has been used as prime horticultural land and supported many smallholdings, the land has only got into its present state by the threat of building.

5] This area should be used as a green buffer zone , helping to prevent the merging of Cheltenham and Shurdington and to keep and protect the outlook over Cheltenham.

6] This open space must help to act as a lung to the area, with all the pollution caused by the amount of traffic already on the A46, more housing means, more traffic, more pollution.

7] The amount of housing has not been based on the Office For National Statistics projection but on short term interim figures, the amount of houses should I believe be based on what housing is really needed and on solid facts.

8] A clear Brownfield policy should be put in place before the JCS is finalised, this application is premature.

9] I don't believe our hospitals will cope with all these extra people ,and that there are enough jobs available locally.

10] Cheltenham is the centre of the Cotswolds attracting tourists, do tourists want to see a mass of sprawling houses blocking the views from and to the hills.

11] If this application is allowed to go ahead it could be only the beginning, with phase 2 or 3 , allowing further development on the Newbridge Construction owned land up to Leckhampton Lane, which is already dangerous and is getting like a race track, being used as a rat run with no one taking any notice of the speed limits, the whole surrounding area cannot sustain any developments.

Yours sincerely

[redacted]

Willow Green
Leckhampton Lane
Shurdington
Cheltenham
Glos. GL51 4XW
13/10/2013

Cheltenham Borough Council Planning
Municipal Offices
Cheltenham
Glos
GL50 9SA

BUILT
Recd 17 OCT 2013
ENVIRONMENT

With ref. to Planning Application 13/01605/OUT

Dear Sir

I wish to object to the above planning application on the following grounds:

1/ The loss of valuable horticultural land said by some to be the finest in the county. It formally supported successful businesses of many smallholders but has been allowed to deteriorate in the face of builders options on the land.

2/ Lack of local infrastructure. There is no provision for an extra Secondary School education when local schools are mostly oversubscribed. The application only vaguely mentions 'potential' other infrastructure that should be considered essential in a locality poor in such amenities.

3/ The A46 is a very busy and dangerous road and currently struggles to cope with existing traffic at peak times. Upwards of 1000 extra vehicle movements and road chaos could be generated by this plan as lack of local employment opportunities will lead to the need to travel distances not covered by bus services.

4/ This large development will ruin the Cheltenham 'green lung buffer' helping to prevent the coalescence of Cheltenham and Shurdington. It will spoil the outlook over Cheltenham from the surrounding hills designated as Areas of Outstanding Natural Beauty. Due regard should be given to the important need to protect the character and appearance of the rural landscape.

5/ This application is premature as it comes ahead of public consultation of the Joint Core Strategy and consideration of real housing local structure needs. The Local Authorities and public should have the opportunity to have an input before any serious planning application is considered.

Yours sincerely



POSTAL
M 16 OCT 2013 O
SERVICES

Drs J and J Pringle
111A Charlton Lane, Cheltenham, GL53 9EE

CBC Planning
Municipal Offices
Cheltenham
GL50 9SA

BUILT
Recd 16 OCT 2013
ENVIRONMENT

Ref. **13/0106/OUT**

Dear Sir/Madam

We write in relation to (a) the proposed growth in housing of 33,000 houses to 2031 in the Joint Core Strategy and (b) the 650 house applications on Leckhampton Green Fields. There appears to be some doubt concerning the figures used for population growth and anticipated housing needs. It seems highly likely that these needs have been exaggerated. Quite apart from this, we are alarmed at the proposition for a number of reasons:

1. The use of green field sites would irreversibly alter the area we live in. The natural appeal of this area both for residents and visitors alike depends entirely upon these green spaces, so it would be an act of short-sightedness and irresponsibility not to utilize brown field sites first, as we have already requested.
2. Cheltenham's infrastructure, in particular roads, schools and health services are already under pressure and would not cope with this level of housing growth. The road system is already under huge strain and the last thing that is needed is the injection of hundreds of additional vehicles onto these roads every day.
3. The huge increase in traffic, particularly along Shurdington Road, would make life for both local residents and motorists pretty miserable and stressful, not to mention the increased air pollution that would result. The closure of Kidnappers Lane would compound matters. These results may not be quantifiable but would dramatically alter the quality of life of those of us affected.

We would be grateful if you would register our strong objection to this proposal and give serious consideration to alternative propositions made by Leckhampton and Warden Hill Parish Council.

Yours faithfully,

[redacted]

[redacted]

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

BUILT
Recd 16 OCT 2013
ENVIRONMENT

See letter

Name [redacted] Ref. 13/01605/OUT

Address 111K CHARLTON LANE CHELTENHAM GL53 9EE

Your Ref. 13/01605/

[redacted]

4 VINERIES CLOSE,
LECKHAMPTON,
CHELTENHAM,
GL53 ONU.

Tracey Crews, Head of Planning,
Cheltenham Borough Council.

16TH October 2013.

Dear Tracey Crews.

Residential and Associated development of land at Leckhampton. – OBJECTION

This proposed development will bring chaos to an already chaotic area. Transport access in Leckhampton is already at breaking point, and until the Council solves the current situation that exists in Leckhampton Lane/ Church Road and on the A46 between Shurdington and Cheltenham, then no further development should take place.

Should further development be required, and I do not accept your figures, then it should be done in areas with easy access to the M5 motorway. Building ~~a~~ an access at Combe Hill M5 junction for traffic going south, and for leaving the motorway for traffic travelling north would help solve much of Cheltenhams traffic problems.

P.T.O.

Accidents are going to happen on Church Road with the current situation – most likely at school times.

The situation can only get worse with additional residential development in Heckhampton.

Sincerely,

[redacted]

BUILT
Recd 16 OCT 2013
ENVIRONMENT

8 Leckhampton Farm Court
Farm Lane
Leckhampton
Cheltenham
Glos.
GL51 3GS

14th October 2013

Mr. Craig Hemphill
CBC Planning
Municipal Offices
Cheltenham
GL50 9SA

BUILT
Recd 16 OCT 2013
ENVIRONMENT

Dear Mr. Hemphill,

OBJECTION: Outline Planning Application Ref: 13/01605/OUT

I object to the above proposal to build 650 houses, a supermarket and other retail units, primary school, community centre, business premises, car parks, and care home on a 33 hectare site in Leckhampton. There are ongoing and significant problems associated with housing development in this area to the south of Cheltenham. These have been detailed in numerous letters by numerous objectors on numerous occasions and which include:

Traffic

1) This Application seeks to turn Kidnappers Lane into a cul-de-sac in a simplistic attempt to prevent the estimated 1,000 vehicles that will be generated by the proposed 650 houses and co-located businesses from reaching the sensitive Church Road area.
The local road network is today heavily utilised. But any attempt to channel the extra loading caused by the proposed development towards Shurdington Road, which itself is already congested, will simply result in the overloading of Shurdington Road (and by extension Bath Road); it will then become a second Church Road, with all the attendant social problems.

2) It is only correct that developers should provide additional resources to cope with the increased demands created by their developments; however in this case the Application will achieve quite the opposite and destroy local resources (by turning Kidnappers Lane into a cul-de-sac).

I am therefore very concerned about the negative impact from this huge increase in traffic passing through Church Road, Shurdington Road, Farm Lane, Kidnappers Lane and Leckhampton Lane daily, and feeding into Leckhampton Road, Bath Road and other local roads.

Air Pollution

3) Air pollution levels already break EU levels in the winter months on Church Road and the A46, and are likely to break it all year round after the EU reduces the recommended level. The current scale of the problem means that the whole of Cheltenham has been made an Air Quality Management Area, and this proposed development would just make a bad situation worse.

Employment

4) Employment opportunities on the south side of Cheltenham are severely restricted which means that new developments (such as this) located south of Cheltenham will force inhabitants to commute elsewhere causing considerably higher traffic flow particularly during peak times. The developers have made a token attempt to co-locate some small businesses with the housing, but these commercial enterprises are very small and will employ an insignificant number of the inhabitants - it is nothing but a fig leaf. The fact remains that the vast majority of the people on such a development would have to commute elsewhere in Cheltenham/Gloucestershire – by car, and the national requirement to drastically cut carbon emissions means that it is no longer acceptable for developments to be dependent on commuting long distances.

Providing schooling infrastructure to support the development

5) This application does not consider where any residents would attend secondary school. All local schools, both primary and secondary, are currently oversubscribed. The nearest secondary school (Cheltenham Bournside) is an Academy and cannot therefore be required to expand further. Children would have to travel to Brockworth or Chosen Hill if spaces were available, or to schools on the opposite side of Cheltenham.

Infrastructure

6) The JCS is still awaiting modelling work that will consider (and presumably specify) the potential impacts of proposed developments, and any mitigation required. The JCS also maintains that it is working with the necessary providers to develop the infrastructure required.

But until the JCS knows what the impacts will be and what mitigation is needed (or even if it is possible), I fail to see how the JCS can meaningfully work to develop the infrastructure required. (In summary, since it is impossible to understand the impacts of the JCS "preferred plan", how can anyone say they prefer it?).

Conclusions

- The above Application is inappropriate for its proposed location and should be rejected.
- Any further Applications should not go before the Planning Committee until the JCS plan for the area of Cheltenham, Tewkesbury and Gloucester City has been finalised.
- The public deserves to know that the housing targets contained in the JCS are objective, transparent and in accordance with the needs of the area and NOT a contrived Developer's Charter. This means that –
- All traffic and infrastructure modelling that the JCS needs to do, must be completed before any 'preferred plan' can be considered.
- The population estimates contained in the JCS housing targets need to be verified with the ONS.

Yours sincerely,

[redacted]

[redacted]
Leckhampton
Cheltenham
GL53 0PE
World Cancer Research Fund (WCRF UK)
www.wcrf-uk.org/learn

Your Ref 13/01605/OUT

BUILT
Recd 16 OCT 2013
ENVIRONMENT

13-10-2013

Dear Sir/Madam

Re Development on land at Leckhampton Shurdington Road Cheltenham

I wish to object to this development in the strongest possible terms for the following reasons.

(1) It will destroy the Countryside nature of this area and the quiet beauty of Leckhampton for ever.

(2) The additional traffic that this development will generate will largely affect Church Road and Shurdington Road both of which are already very busy particularly at peak times.

(3) I do not think that there is a need for the number of houses that has been quoted.

I hope that the Cheltenham Borough Council will carefully consider the points I have made and refuse the development application.

Yours faithfully

[redacted]

BUILT
Recd 15 OCT 2013
ENVIRONMENT

19 Gordon Road, Cheltenham, Glos. GL53 0ES
[redacted]

C B C Planning
Municipal offices
Promenade
Cheltenham
GL50 9SA

Outline Planning Application (Ref.13/01605/OUT

14 October 2013

Dear Sir or Madam

I would like to register my views and comments, as follows:

1) My main objection is to the building of extra dwellings on the Cotswold Area of Outstanding Natural Beauty or on land near to it.

2) I object to building on top grade agricultural land, land on the flood plain and on land which suffers flooding regularly. Warden Hill could suffer from flooding caused by building on the land in question.

3) If we need more affordable housing, it should be within the present built-up area, particularly on brownfield sites.

4) Because of the narrow roads in the Leckhampton area, there would be an increase in the already high levels of traffic congestion and resultant pollution. I understand that Kidnappers Lane into Church Road and Shurdington Road will be closed. It is estimated that a further 1000 vehicles will all exit on to Shurdington Road thus causing more traffic congestion on the already over capacity road network. There MUST BE a JCS transport plan and traffic modelling before this application goes to Planning Committee.

5) Air pollution levels already break EU levels in winter months on Church Road and the A46. Cheltenham has been made an Air Quality Management Area in response to the problem .

6)There are insufficient secondary school places to cope with the increased demand this development would generate.

Before any planning application is considered, The Joint Core Strategy for the area of Cheltenham, Gloucester City and Tewkesbury should be finalised and all aspects of planning, transport, environment and population estimates contained in the housing targets should be verified.

We, the public, deserve to be sure that the housing targets contained in the JCS are in accordance with the needs of the area.

[redacted]

19 Gordon Road, Cheltenham, Glos. GL53 0ES
[redacted]

BUILT
Recd 15 OCT 2013
ENVIRONMENT

C B C Planning
Municipal offices
Promenade
Cheltenham
GL50 9SA

Outline Planning Application (Ref.13/01605/OUT

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Yours faithfully

[redacted]

BUILT
Rcvd 15 OCT 2013
ENVIRONMENT

19 Gordon Road, Cheltenham, Glos. GL53 0ES
[redacted]

C B C Planning
Municipal offices
Promenade
Cheltenham
GL50 9SA

Outline Planning Application (Ref.13/01605/OUT

14 October 2013

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[redacted]

BUILT
Recd 15 OCT 2013
ENVIRONMENT

Autumn Fall
104 Shurdington Road
Cheltenham
Glo'shire
GL53 0JH
Tel 01242 238076

The Planning Department
Cheltenham Borough Council
PO Box 12
Municipal Offices
Promenade
Cheltenham
Gloucestershire
GL50 1PP

Attention Mr Craig Hemphill (Planning Officer)

13 October 2013

Dear Sir

Strong Opposition to - Planning Application No 13/01605/OUT
At Leckhampton/Shurdington Road, Cheltenham.

1. We send this letter to register our Formal Objection to the above Planning Application.

2. Firstly however we cannot understand how this Planning Application is being formally considered at this date in October 2013, as the Consultation Process of the recently announced Joint Core Strategy (JCS) is still underway – especially as the location of this actual planning application is right at the very heart of the JCS.

3. There is so much we could say in detail about "our horror" should the application be approved, but we will do our best to keep our Objection Points in a clear and concise manner - we are willing to additionally discuss our major concerns if you wish.

4. At the end of this letter is a Schedule detailing the enclosed documentary evidence mentioned in this particular correspondence (Photos of traffic delays and a Pollution document), which we are confident will assist in your deliberations.

5. **The main reasons how this Application will have a serious and damaging impact on our life are**:

(i) ***The closeness and overpowering nature of the proposed hundreds of new homes to our home*** - we are living in a small close, the majority of which are bungalows occupied by mature and elderly residents and our homes are only a matter of yards from this new building site for 650 homes plus other buildings.

(ii) **Overdevelopment**

We really hope the Application is Refused, but if the Application is approved, we would like the new development to be shielded from us from sight, noise and pollution by extending/moving the large green open space already on the plans to be right alongside our bungalows. This would mean the actual new houses would have to be at least 100 yards from our homes.

Likewise this would mean a re-siting of the 2 newly Proposed road junctions, which are also yards away from our home – see below.

(iii) ***The proposed closeness to our homes of 2 new Traffic Controlled Junctions for buses and other motor vehicles.***

We feel it very important that we bring to your EARLY attention in this letter, that there is already a VERY REAL EXAMPLE available for closer analysis of the absolute chaos that has recently occurred due to road works on the A46 Shurdington Road in Cheltenham lasting for several days in April 2013 - ***within yards of where the proposed 2 new Traffic Controls/Junctions will be located***.

In April 2013 Severn Trent in undertaking their necessary work had to place **one** set of temporary traffic lights controlling traffic movements at Shurdington Road in and out Cheltenham.

As we live within yards of this road works site, we can definitely confirm that even on the 2013 current volume of traffic, considerable traffic queues were caused throughout the day (not just the rush hour). Bus time tables were also totally disrupted often with 3 buses coming along together and Emergency vehicles were faced with having to overcome additional considerable delays.

Additional road safety dangers were also being experienced by motorists, pedal cyclists and pedestrians.

This matter was formally referred to my local councillor for appropriate contact to occur with the various Local Authorities and Severn Trent. These organisations will be able to confirm these traffic problems and in order to assist the Cheltenham Borough Council Planning Department further, we have also taken photos to confirm the lengthy traffic queues at various locations along this Shurdington Road at different days and times due to this particular road works/traffic lights control - *see our photos enclosed for your consideration*).

The major point worthy of appreciation is that traffic chaos was caused with one set of traffic lights and with the current volume of traffic, so one has to ask - "*what will be the serious impact with 2 Permanent Traffic controlled Road junctions almost at the same location on the Shurdington Road in Cheltenham - together with the additional cars, lorries, buses, cyclists and pedestrians associated with an extra 650 homes nearby*".

This particular point should not be considered in isolation as far as this CBC Planning Application is concerned, as the increasing level of traffic on the main A46 Shurdington Road in and around Cheltenham will obviously be a major discussion issue within the ingredients of the overall JCS for Cheltenham, Tewkesbury and Gloucester Planning Areas.

(iv) ***The damaging and increased level of Air and Noise Pollution*** - brought about by the extra homes and associated traffic in what is at present is an enjoyable rural environment.

The very nature of slow moving traffic/idling engines on the Shurdington Road brought about by these 2 new junctions will again seriously impact on our lives with a definite increase in Air and Noise Pollution – thereby damaging our health. The closeness of the new Bus route on this development will especially cause additional Pollution.

We also attach *an extract of a leaflet* distributed by the Green Political Party to the public at the time of the recent local election on 2 May 2013 - which clearly comments and shows a photo of the Current high level of traffic and resultant pollution on the A46 Shurdington Road. Other Political Parties have also consistently made very similar comments about any increase in traffic on the A46 Shurdington Road. This shows that it is of some serious concern in the wider community of Cheltenham area – it is not just "one or two" local residents making these comments.

We are sure that everyone will agree that Air pollution caused by heavy traffic has to be an increasing major concern and deserves to be properly and professionally measured and considered in making correct decisions on this planning application.

(v) Additional traffic dangers on the Shurdington Road in Cheltenham.

We have lived in our current bungalow home since 1981 (32 years) and have especially been aware of the problems of the increase in

traffic on this busy road (A46) in recent years. The road safety problems today are very real and we can confirm that collisions involving cars, lorries, buses, cyclists and pedestrians are at serious risk of happening every day.

Over the years we have had reasons to liaise with local authorities/councillors/MP and also to examine formal planning records of both the Cheltenham and Tewkesbury Borough Councils and can state that the 2 Councils have had policies to REFUSE planning applications, where it was intended that even a few new dwellings would be gaining access on to this same busy main road.

We recollect that the reasons put forward for their Refusals to Grant Planning Applications have largely related to the Dangers caused by the additional movements of traffic and pedestrians on this busy road. These comments were supported by the Gloucestershire County Council Highways department - as the A46 Shurdington Road was and still is a very busy main road.

The Volume of traffic today has to our knowledge definitely increased since the Planning Refusals mentioned in the above para and must surely now be at its maximum capacity already. Anyone travelling this road on a regular basis will be aware of the lengthy queues in and out of Cheltenham as a result of the current amount of traffic. In fact traffic is "at a stop" for lengthy periods in the day. There must be current County Highways Department Traffic Census records to prove these facts.

The traffic problems on the A46 are also nowadays made a lot worse by the regular use of this road as a detour or overflow following problems on the nearby A417 and M5 main roads. (Regularly broadcast on local and national radio).

6. This current Planning Application will also have major implications for other matters of serious concern:

a. **Dwindling resources of local Police, Fire, Ambulance and NHS/Hospitals** - in dealing with the anticipated increased level of accidents, injured persons, motoring offences and responding to other incidents over a 24 hour period.

b. **Loss of the enjoyable Countryside and Wildlife.**

c. **Increased Flooding risk.**

d. **Extra Traffic/Pollution/Danger on local Country roads and lanes.**

e. **Will local Junior and Senior schools be able to take a large increase in pupil numbers?**

7. Final Comments

Whilst there will be obvious major worries caused by the possible building of thousands of new homes within the criteria and parameters of the JCS - the proposed 650 new homes subject of this current Cheltenham Borough Council planning application are still a major problem "in their own right" for the many important reasons detailed above.

We trust you will carry out all the necessary research into this issue (some of which are mentioned in this letter) and also that you will give our views very careful consideration, as it is our strong wish that the **Planning Application be REFUSED.**

Yours faithfully

[redacted]

ENC

Schedule of documentary exhibits to OBJECT to Planning Application No 13/01605/OUT - at land at Leckhampton/Shurdington Road, Cheltenham.

Photo No	Day/Date/Time taken	Description of Photo

MAH 6133 Frid 12.4.13 245pm - Shurdington Road near Highwood Avenue

MAH 6139 Frid 12.4.13 249pm - Shurdington Road/Moorend Park Rd TLs.

MAH 6140 Frid 12.4.13 249pm - Shurdington Road/Moorend Park Rd TLs.

MAH 6145 Frid 12.4.13 251pm - A Star Traffic Management van at Highwood Ave/Shurdington Rd near ST road works site.

MAH 6197 Mon 15.4.13 0818am - Shurdington Road near Kidnappers Lane junction.

Also enclosed is documentary exhibit no **MAH 1** - a copy of the Green Party political leaflet for the 2.5.2013 local election – referring to the heavy traffic problems and resultant air pollution on the Shurdington Road.

[redacted]

Dated 13 October 2013

1640-131013-4ko

MAH 1

BUILT
Recd 15 OCT 2013
ENVIRONMENT

Green Party

FAIR IS WORTH FIGHTING FOR

TRAFFIC in TOWN

Did you know that...

Some areas of Cheltenham have such poor air quality that residents are forced to breath air that falls below the minimum standards set by the World Health Organisation?

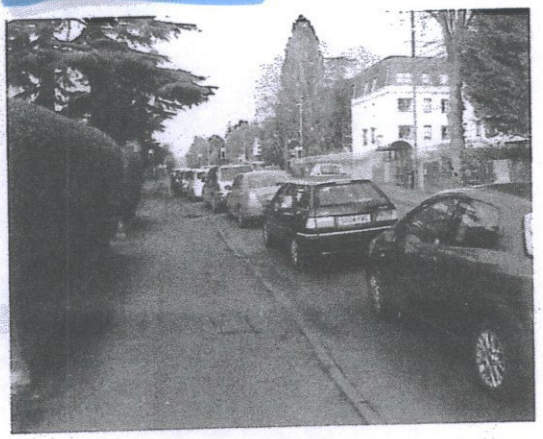
The main cause of this problem is traffic and it will take coordinated action and a change in the way we travel around the town if ill health problems caused by traffic pollution are to be a thing of the past.

The endless delays in tackling this issue suggest this needs to be a top priority now!

"I will work to reduce traffic congestion and improve air quality"

"Traffic must not dominate"

Below: Traffic build up on the Shurdington Road



PROTECT our GREEN SPACES

Does Leckhampton need a Country Park or more homes?

Most existing residents clearly favour the Country Park option. Greens know that it will take more than local opposition to developments to stop the relentless concreting over of the countryside.

Ref 13/01605/OUT

[redacted]

104 Shurdington Rd
CHELT.

Cheltenham Green Party

FAIR IS WORTH FIGHTING FOR

Your chance for a ***REAL*** CHOICE FOR CHANGE

IN THE UK? YES.....

- ☑ Caroline Lucas, Britain's first Green MP-Voted MP of the Year 2011
- ☑ Brighton and Hove Council in Sussex already controlled by the Green Party
- ☑ The main opposition party in Norwich City Council is the Green Party

WEST MIDLANDS? YES...

- ☑ 12 Green Party councillors voted in on 7 councils

IN GLOUCESTERSHIRE? YES...

- ☑ The Green party is already in a 'rainbow' coalition in Stroud, Gloucestershire
- ☑ Green Party County councillor

"If we do what we have done in the past again the future will be just the same as now. If you want real change and a better future vote for the Green Party on May 2nd. " :

"Fair is worth voting for."



Vote Sarah Field ☑

ON MAY 2nd 2013.....VOTE for the Green Party

ELLIOTT
Ball & Co.
LET

BALL & Co
LET


0800
707
6646
24hr service
www.astartraffic.co.uk
A-Star
Traffic Management

[redacted]

BUILT
Recd 15 OCT 2013
ENVIRONMENT

Foxfield House,
Church Road
Leckhampton
Glos.
GL 53 0QT

October 13, 2013

Reference 13/01605/OUT

Dear Sirs,

I understand that yet again an outline planning application has been made in the area of Kidnappers Lane, Leckhampton under the above reference.

In the first instance, this application appears to be premature, & I therefore assume that the application cannot go before the Planning Committee and any decision taken until the Joint Core Strategy for the area - Cheltenham, Tewkesbury & Gloucester City - has been finalised, and I would like confirmation that my reasoning is correct.

With regard to potential development in the area, I would like to point out the following:

- Church Road + Shardington Road already suffer from an excess of traffic in the morning + evenings. A further 650 houses will result in a further (minimum) of 1000 vehicles in the area, which will exacerbate an already unacceptable situation

- Air pollution levels in Church Road exceed levels acceptable under EU regulations. This proposed development will result in further deterioration of air quality.

- Although there is a proposal for a new primary school within the application, this does nothing but further the shortage of senior school places in the area; with the resultant increase in public transport demands and further cross town traffic.

I believe the application 13/01605/OUT should be immediately rejected as it is premature, and post-adoption of the Joint Core Strategy should be ~~the application should be~~ dismissed.

Yours faithfully, [signature]

[redacted]

Leckhampton Farm Court, Leckhampton, Cheltenham, Gloucestershire GL51 3GS

[redacted]

BUILT
Recd 15 OCT 2013
ENVIRONMENT

CBC Planning
Municipal Offices
Cheltenham
GL50 9SA

October 14th 2013

RE: OUTLINE PLANNING APPLICATION 13/01605/OUT - SOUTH OF CHELTENHAM

Dear CBC Planning Department,

We are writing to strongly object to this application for the following reasons:

- This development will destroy precious wildlife and habitat, unique smallholdings and good quality pastoral land. This destruction by covering with housing, new lighting, roads and more vehicles would certainly add to the carbon footprint. Bearing in mind air pollution levels are already extremely high along the A46 and Church Road, exceeding EU levels in the winter.

- We cannot see how the existing road network will cope with the additional estimated 1,000+ vehicles using the A46 Shurdington Road which is already 'grid locked' at peak times.
  The impact on Church Road and Farm Lane will be detrimental as these roads will see more and more traffic with the closure of Kidnappers Lane making no difference. WE WOULD LIKE TO SEE THE JCS TRANSPORT PLAN AND MODELLING FOR LECKHAMPTON BEFORE THIS APPLICATION GOES TO PLANNING.

- A new primary school is planned but there is no provision for secondary education. The existing senior schools are already full so where are the incoming pupils going to study?

- THIS OUTLINE APPLICATION IS PREMATURE. We feel that this application should NOT go before the planning committee until the JCS has been finalised. Are the growth estimates for population correct? Once again where is the transport plan?

- This development is planned on Green field sites and according to the NPPF Brown field sites should be considered first. Green fields and the Green Belt are precious and make living in Cheltenham attractive. We need more housing but we need to respect our landscape and consider the concequences of more urban sprawl.

PLEASE REJECT THIS APPLICATION FOR THE DEVELOPMENT OF 650 HOUSES.

Yours faithfully,

[redacted]

BUILT
15 OCT 2013
ENVIRONMENT

52 Collum End Rise
Leckhampton
Cheltenham
GL53 0PB
[redacted]

The Manager
CBC Planning
Joint Core Strategy Team
Municipal Offices
Cheltenham
GL50 9SA
Reference No 13/01605
Dear Sir

I object strongly to the continuing applications for new housing on land off Kidnappers Lane, Leckampton, Cheltenham.

May I suggest that a survey of road congestion be carried our forthwith during a full week and not in school holidays.

It will prove that apart from many other counter points to the proposal that the road infrastructure is at present congested during peak periods on any business day and at weekends surrounding this area. (Shurdington Road, Leckhampton Lane, Church Road and all converging on to Bath Road). Road widening cannot be considred.

The further loading of traffic arising from the proposed project would bring increased traffic movement to a standstill. You may not have considered the advent of shopping on line and deliveries by large vehicles to homes which would aggravate the situation.

The increased numbers in population will only come from areas outside of the Gloucester/Cheltenham conurbations.

The whole project is foolhardy and would only benefit the profits of the housebuilding fraternity who would then take no further part in the locality having achieved their aim.

There would be no benefit to the current or proposed increase in residents.

I fully support the counter action taken by the 'Green Land Action Group' in apposition to the proposals.

Yours faithfully

[redacted]

BUILT
Recd 15 OCT 2013
ENVIRONMENT

52 Collum End Rise
Leckhampton
Cheltenham
GL53 0PB
[redacted]

13th October 2013

The Manager
CBC Planning
Joint Core Strategy Team
Municipal Offices
Cheltenham
GL50 9SA
Reference No 13/01605
Dear Sir

I object strongly to the continuing applications for new housing on land off Kidnappers Lane, Leckampton, Cheltenham.

May I suggest that a survey of road congestion be carried our forthwith during a full week and not in school holidays.

It will prove that apart from many other counter points to the proposal that the road infrastructure is at present congested during peak periods on any business day and at weekends surrounding this area. (Shurdington Road, Leckhampton Lane, Church Road and all converging on to Bath Road). Road widening cannot be considred.

The further loading of traffic arising from the proposed project would bring increased traffic movement to a standstill. You may not have considered the advent of shopping on line and deliveries by large vehicles to homes which would aggravate the situation.

The increased numbers in population will only come from areas outside of the Gloucester/Cheltenham conurbations.

The whole project is foolhardy and would only benefit the profits of the housebuilding fraternity who would then take no further part in the locality having achieved their aim.

There would be no benefit to the current or proposed increase in residents.

I fully support the counter action taken by the 'Green Land Action Group' in apposition to the proposals.

Yours faithfully
[redacted]

48 Collum End Rise
Cheltenham
GL53 0PB
10 October 2013

BUILT
Recd 14 OCT 2013
ENVIRONMENT

CBC Planning
Municipal Offices
Cheltenham
GL50 9SA

Dear Sir,

Kidnappers Lane Planning Application
Your ref 13/01605/OUT

It is extraordinary that, yet again, a planning application has been submitted to build on a significant portion of the green land between Leckhampton and Shurdington. How many times must the very serious objections be set out before it is realised that repeated applications do not make them go away?

The land in this case is vital for the protection of the Warden Hill estate from flooding by runoff from Leckhampton Hill. Much of the land is frequently waterlogged in wet weather, a fact that would not be clear from merely looking at a map. This kind of protection needs a large contiguous area left free from development, and building on even a small part of it, never mind this substantial area, makes all of the surrounding area vulnerable.

Congestion along the Shurdington Road is already severe at times and getting progressively worse without any new construction. I think the plans specify that all the traffic from the proposed development will go onto Shurdington Road, with no prospect of alleviation. Stationary queues from the Norwood to the Up Hatherley Way roundabout are the norm in the morning rush-hour. There is often a queue at the same time on Moorend Park Road waiting for the traffic lights; this would be made much worse if access from Leckhampton to Warden Hill via Kidnappers Lane were closed off.

Population and housing expansion cannot continue indefinitely. At some point the land will be full, and this must be well short of the point where it is all built on, for the sake of a healthy society. The land between Leckhampton/Warden Hill and Shurdington needs to be left alone for the sake of generations to come. Bovis Homes and Miller Homes and landowners in the area need to know for sure that housing, commercial or industrial development has no part in the future of this land.

Yours sincerely

[redacted]

13/01605/OUT

Land at Leckhampton

Representations

Batch 3

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

The infrastructure plans look inadequate. The increase in traffic will cripple south Cheltenham & cause ridiculous bottlenecks on Shurdington Rd. Air quality is already a problem & this will worsen with this silly plan.
The timing of the application is poor: it should be considered after the JCS is finalised

Rec'd 23 OCT 2013
ENVIRON...

Name [redacted]

Address 24 Church Road GL53 0PR

Ref. 13/01605/OUT

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BUT
Recd 23 OCT 2013
ENVIR...

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

* Material objections *

Comments & Observations on 650 House Application on Leckhampton Green Fields

* Kidnappers Lane into Church Rd will Sherrington Rd be closed

* An additional (est) 1000 Vehicles all will exit onto Shurrington Rd

* Another developer has already described this road network as 'broken' + 'is over capacity' the argument being used that the network + we cannot make it any worse.

This is crazy + precisely why we need the JCS transport plan + traffic modelling for Leckhampton before this application goes to committee.

* Air pollution levels already break EU Levels in winter months on Church Rd + the A46 + the whole of Cheltenham has been made a Air Quality Management Area in response to the problem.

Name [redacted] 6 CHARNWOOD RD CHELTENHAM GL53 0HJ.

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I have yet to see a full IMPACT ASSESSMENT using clear, open, unbiased (independent) evidence in relation to the following environmental aspects:-
FLOODING - run off to surrounding fields + dwellings;
TRAFFIC - increase on current levels on A46 Leckhampton Lane / Church Road + Bath Road.
AIR QUALITY - already above EU levels along A46 at rush hour.
SECONDARY SCHOOLS - Bournside + Balcarras both full.
WILDLIFE - reduce rare bird species, destroy more hedgerows.

Rec'd 23 OCT 2013

Name [redacted]

Address 20 THE LANES GL53 0PU.

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Brown field sites MUST be used first

Estimates of housing needs MUST be backed by Verified Statistics

There is not the infrastructure to support new houses in this area

[redacted]

BUILT
Recd 23 OCT 2013
ENVIRONMENT

Name [redacted]

Address GLS0 3EP NO 61

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Extra vehicles all exiting onto Shurdington Rd.
Woodlands Rd becoming a 'rat run'
Insufficient Senior school places.

BUT
Recd 23 OCT 2013
ENVIR

Name [redacted]

Ref. 13/01605/OUT

Address 25 WOODLANDS ROAD CHELTENHAM

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Dear Sir,

Apologies for the late dispatch of this card.
I would like to say that I am pretty disgusted with the Lib dems behaviour in this matter, and although I have supported you & voted for you for years, I can no longer do so. The roads around the area are already too busy at peak times, and the schools, I hear, are already full.

BUILT
Recd 23 OCT 2013
ENVIRONS

Ref. 13/01605/OUT

Name [redacted]

Address 63, LECKHAMPTON ROAD
GL53 0DS

BUILT

Recd 23 OCT 2013

Danielle Lockie from Newtown St. Boswells A Retailer in

Royal Mail Bath Bristol Taunton

Delivered by

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

We are opposed to this development for the following reasons.

- Traffic. The roads are already saturated in this area at peak times and the increase in cars (~1000) resulting from this development would be intolerable
- Education. Although providing a much needed primary school, any more residents would further compromise secondary education.
- Environment. Additional houses would affect air pollution, flood risk and visual impact
- Infrastructure. The way this development would link to existing facilities in Cheltenham has not been thoroughly considered so the benefit to Cheltenham is not demonstrated.

Name [redacted]

Ref. 13/01605/OUT

Address 6 LARCH RISE, CHELTENHAM, GL53 0PY

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

(1) – The application should not be considered until the JCS (Partial) for the area has been formalised. This to include transport, environment and the full infrastructure to support such a development has been considered.

(2) The 650 house would "produce" c1000 additional cars which would gridlock the area!

[redacted]

Name

Address 8 The Spindles
Cheltenham GL53 0QJ

Rec'd 23 OCT 2013
ENV

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I understand we must build more houses for an increasing population, but this amount of housing on one site seems disproportionate - the roads, local traders, schools, hospital/doctors etc (and drains?) will not cope, and the loss of the current green field site will be a considerable blow. I understand some new amenities are proposed, but this relies on people to staff them (teachers, nurses, doctors) when posts are already unfilled in many areas. The level of opposition risks the creation of 'them v. us' and an 'estate' on the edge of town. A smaller number of houses would seem far easier to assimilate into a single community!

Name [redacted]

Address 20 Hall Rd, Leckhampton GL53 0HE

BUILT
Ref. 13/01605/OUT
Recd 23 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

THE building of above will virtually make us prisoners - My husband is wheel chair bound severely disabled and it will be harder to go to hospital or for ambulances to reach us - If Church Rd & Shurdington Rd are closed the developers will be responsible for any accident happening to him - It will be virtually impossible to go shopping into Cheltenham, Go to the Doctor and Dentist This is madness - Network will not be worse it will come to a STANDSTILL - If measures are not taken to safeguard our security we will sue

[redacted]

Name MEDLEY GREEN FARM

Address CRIPPETTS LANE ←
LECKHAMPTON GL 51 4XT

BUILT
Ref. 13/01605/OUT
Recd 23 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I object to this due to environmental pressures, congestion and loss of green belt.

BUILT
Recd 22 OCT 2013
ENVIRONME

Name [redacted]

Ref. 13/01605/OUT

Address 8 Justice Way, Up ~~Hatherley~~ Hatherley. Cheltenham

BUILT
Recd 23 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION - KINNAPPERS LANE
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

The land between the Shurdington Road, Church Road and Farm Lane is a very special space for the whole area south of Cheltenham. It is our lungs, as vital and should be increased, not developed, once land is developed it is lost of grazing, food, recreation, agriculture forever. These houses MUST NOT be built, infrastructure also cannot support the burden of so many people in an already over developed area the natural space must be kept.

Name [redacted] Ref. 13/01605/OUT

Address 28 Moorend Park Road, GL53 0SY.

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I do appreciate that housing is needed, but the road infrastructure is never going to be sufficient for absorbing so intensive a development off the A46.

BUILT
Rec'd 23 OCT 2013
ENVIRONMENT

Name [redacted]

Ref. 13/01605/OUT

Address 28 MOOREND PARK RD., Cheltenham GL53 0JY

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

① Greenbelt guidance/provision is just that, why is being disregarded?

② This is not the best area for development, for how long can we keep ~~gone~~ covering our green fields with buildings

③ All this does make any sense to the public whose views appear to be disregarded

BUILT
Recd. 23 OCT 2013
ENVIRONMENT

Name [redacted]

Address 9 Pilford Rd Leckhampton.

Ref 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

- Green field sites should be sacrosanct.
- Already many new houses + flats have been built (and are being built) in the Cheltenham area
- I can't believe that the population is scheduled to expand so rapidly!

[P.S. It's also daft to close Bath Corner to traffic]

Name [redacted]

Address 21 Arthur Bliss Gardens

BUILT
Recd 24 OCT 2013
ENVIRON

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

- Traffic already far too busy far too congested at the rest of times. The proposed development would 'break the road network'

Once our countryside is destroyed, it is too late. Dont let this happen.

BUILT
Rcvd 24 OCT 2013
Ref. 13/01605/OUT
LAND DEVELOPMENT

Name [redacted]

Address 8 Brizn Lane, Leckhampton GL53 0NG

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

- This number of houses is Not needed. Our beautiful Country side should be protected and not even more of it ruined by Greedy developers.
- At peak hours, the Shurdington road is already at its peak Capacity. The development would mean a huge increase in traffic, posing a massive problem, not to mention the Safety aspects.
- This development Should Not go ahead!

Name [redacted]

Address 6 Silcox Close, Cheltenham GL53 0NG

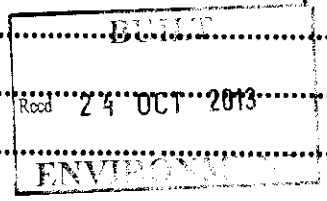
Ref. 13/01605/OUT
Rcvd 24 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I am concerned about the narrowness of the Lane it needs to be widened

What will happen to the farm land? and the livelihood to those who run the farm?



[redacted]

Name .....

Address 44 Westbury Rd GL53 9EW

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I oppose this Planning Application

I believe it will significantly affect the drainage in a detrimental manner.

BUT
Recd 24 OCT 2013
ENVT

Name [redacted]

Ref. 13/01605/OUT

Address 57 The Park
Cheltenham GL50 2SA

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I do not think this development is appropriate on the site proposed. The roads in this area particularly Leckhampton Lane are already congested and the development would exacerbate this problem. The streets around Leckhampton Primary School are already very dangerous. There is significant publicly-owned land that could be released to meet any real needs in the area without using green belt land. What a legacy for the next generation!

[redacted]

Name

Address 24 Kilford Road Cheltenham.

BUILT
Recd 24 OCT 2013 Ref. 13/01605/OUT
ENVIR

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

AREA IMMEDIATELY OUTSIDE PROPOSED DEVELOPMENT

WHAT PRESENT REALISTIC PROJECTIONS ARE THERE REGARDING INCREASED TRAFFIC FLOW (PARTICULARLY ON SHURDINGTON ROAD, & ENTERING AND LEAVING THE ESTATE), AIR QUALITY AND ACOUSTICS.

AREA WITHIN THE PROPOSED DEVELOPMENT

CONSIDERING THE VICINITY, IS IT NECESSARY TO HAVE 3 STOREY BUILDINGS, SHOWN IN THE LOCAL CENTRE

WHAT SPECIFIC PROVISION IS MADE FOR GYPSY TRAVELLERS & TRAVELLING SHOW PEOPLE.

Name [redacted]

Address 20 HAWKSWOOD RD
THE WOODLANDS.

BUILT
Recd 24 OCT 2013
ENVIRON

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I AM APPALLED & SADDENED BY THE POTENTIAL PLANNING APPLICATION TO A DEVELOPMENT OFF KIDNAPPERS LANE, CHELTENHAM. WHY SHOULD I ADD TO THE CARBON FOOTPRINT BY THE CLOSURE OF FAM LANE AT BOTH ENDS, & FURTHER TRAVEL TO GET TO WORK IN CHELTENHAM. THE ROADS ARE OLD, SMALL AND VERY RURAL. NOT MADE FOR MANY EXTRA CARS. WHEN WALKING IN THE MORNING YOU CAN SMELL THE EXHAUST FUMES ALREADY - WHAT IF MORE IN THIS AREA. WE MUST OBJECT & FIGHT THIS SILLY & DANGEROUS PLAN.

Name [redacted]

Address 27 BRIZEN LANE

GL53 0NG

Rec'd 24 OCT 2013

Ref 13/01605/OUT

ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I AM VERY CONCERNED ABOUT THE EXTRA CARS ON SHURDINGTON / BATH ROAD WHICH IS ALREADY PROBLEMATIC.

ALSO, ANOTHER SENIOR SCHOOL WOULD HAVE TO BE BUILT IN LECKHAMPTON AREA AS BALCARRAS & BOURNSIDE ARE ALREADY OVERSUBSCRIBED.

Name [redacted]

Address AMARANTH WAY

Rec'd 2 OCT 2013
ENVIRONMENT

Ref. 13/01605/OUT

BUILT
Rec'd 23 OCT 2013
ENVIRO

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - ~~Official End Date 18th~~ OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

(1) I use these fields almost every day and their loss to houses will unquestionably damage my life, which involves use of these fields.

(2) As an asthmatic, regular exercise in clean air maintains my health, to which these fields contribute.

(3) The increase in housing and pollution and traffic will adversely affect my health and quality of life.

(4) Choice of address not based on proximity to open space which will be lost.

Name [redacted]

Address 13 Hawkswood Road

BUILT
Recd 22 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

This is a lousy idea driven by short-term political expediency. How many times have bids to build in ~~Exeter~~ Leckhampton been denied? So what has happened to make it suddenly a good thing? Leckhampton's roads are already clogged with traffic. You want to make it worse. The infrastructure doesn't exist to support a presumed influx of people. Where will these people come from with no jobs to go to? The estimates of the number of people expected to move into the area are exaggerated. Apart from which green fields have their own value - humans need to be connected to nature. Each green field will exacerbate flooding issues.

Name [redacted] Ref. 13/01605/OUT

Address 1 JASMIN WAY, GL51 3HZ

BUILT

Rcvd 22 OCT 2013

ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Please do not build on our green fields on the edge of our town which is used so much for recreation by all Cheltenham residents – they are our green 'lungs'. The A46 is already choked with traffic any more traffic will make life intolerable & make air quality even worse. Build on Brownfield sites not our precious greenbelt We do not need this amount of houses.

Name [redacted]

Address [redacted] Charlton Gardens Charlton Lane, Cheltenham GL53 9EB.

Ref. 13/01605/OUT

BUILT
Recd 22 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Why aren't the Government encouraging small families to Controlling immigration instead of accepting ever rising populations. What about the wildlife living in Kidnappers lane area. No one seems to care. Instead there'll be more Squashed hedgehogs and traffic ~~jams~~ jams when. As a cyclist I dread this Kidnappers Lane will be like a hideous Gallagher Retail park and Shurdington Road like the Tewkesbury road, what a dreadful thought. We have to stop the greed that's ruining our countryside

Name [redacted]

Ref. 13/01605/OUT

Address 302 Old Bath Road Cheltenham.

BUILT
Recd 22 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION ~~KIDNAPPERS LANE~~
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Insufficient transport network to accommodate the new development; roads and rail.
Insufficient employment local to the area.
The population estimates are potentially flawed.
Existing road network is insufficient for the current traffic levels.
The proposal is entirely inconsistent with the needs of the local population.
The proposal will ruin an area of outstanding natural beauty.

Name [redacted] Ref. 13/01605/OUT

Address 12a Moorend Street, Cheltenham, Glos.

BUILT
Recd 22 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

- THE CURRENT ~~ROAD~~ INFRASTRUCTURE IS ALREADY OVER CAPACITY - ADDING TO THE OVERALL TRAFFIC LOAD BY DEVELOPING 650 HOMES AND ASSOCIATED DEVELOPMENTS WILL MAKE A BAD SITUATION WORSE
- THE ADDITIONAL LOAD WILL ALSO FURTHER ADD TO THE ESTABLISHED PROBLEM OF AIR QUALITY ON CHURCH RD & THE A46
- THE AREA ~~DOES NOT HAVE~~ SENIOR SCHOOL PLACES TO ACCOMODATE THE INCREASE BROUGHT THROUGH THE DEVELOPMENT OF THE 650 NEW HOMES

Name [redacted]

Address 36 HALL ROAD.

Ref. 13/01605/OUT

BUILT

Recd 22 OCT 2013

ENVIRO

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Ref: 13/01605/OUT

I am writing to object to the proposal to build 650 houses, a junior school, a drs surgery and a GP hospital on Glebe land adjoining the A46 Shurdington Road.

This is unique land of great beauty with a valuable network of footpaths crossing it and with high grade horticultural land which has been strip farmed since (13)

This application is very premature. We have no transport, J.C.S or pollution conclusions yet in place. We have no final plans to address the long standing problem of the A46/A417 Air Balloon dangerous junction. There can be no justification for such an early application other than hoping to beat these burning issues!

Name [redacted]

Address [redacted]
127 Church Road
Leckhampton GL53 0NY

Ref. 13/01605/OUT

BUILT

Recd 22 OCT 2013

ENVIRON

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I OBJECT TO THE PROPOSED HOUSING DEVELOPMENT ON THE FOLLOWING GROUNDS

- TRAFFIC FLOW THROUGH SHURDINGTON WILL INCREASE CAUSING MORE CONGESTION. ALSO ON ROADS ACROSS TOWN.
- I LIKE THE GREEN SPACE TO THE EAST OF THE A46 AND THIS WILL BE RUINED. THIS SHOULD REMAIN GREEN BELT.
- CATCHMENT AREAS FOR SECONDARY SCHOOLS ARE ALREADY ESTABLISHED, A STRATEGY FOR SCHOOLING HAS NOT BEEN PROPERLY ESTABLISHED
- CHURCH LANE TRAFFIC CALMING PROPOSALS ARE NOT DEFINED, MOST LIKELY THIS WILL INVOLVE SPEED HUMPS ALONG THE LENGTH OF THIS ROAD

Name [redacted]

Ref. 13/01605/OUT

Address 22 BRIZEN LANE GL53 ONG

18/10/13

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

LOCAL INFRASTRUCTURE ESPECIALLY PLACES IN SCHOOLS, DOCTOR SURGERIES AND TRAFFIC VOLUMES ARE ALREADY UNDER STRAIN

BUILT
Rec'd 22 OCT 2013
ENVIRONMENT

Name [redacted]

Ref. 13/01605/OUT

Address 12 MOORLAND RD, GL53 0HD

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

MASSIVE TRAFFIC PROBLEMS -
ALREADY TAKES OVER 30 MINS
FROM OUR HOUSE TO MOOREND RD
JUNCTION BETWEEN 8-9 AM.

THIS WOULD BE MADNESS !!!!!!!!!!

SCHOOL PLACES ARE ALREADY AT
BREAKING POINT!

Name [redacted]

Address 22 THE LANES, LECKHAMPTON,
CHELTENHAM, GL53 0PW

BUILT
Ref. 13/01605/OUT
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PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

this is going to totally ruin the character of the area, which people like to live in because of the easy access to and walks in local fields. The roads, particularly Church Rd and the A46 won't be able to cope.

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Name [redacted]

Ref. 13/01605/OUT

Address 54 Moorend Rd, Cheltenham GL53 0HD

B[illegible]
Rec'd 22 OCT 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

- We strongly object to the above planning application, as local residents.
- This application is premature and should NOT go before the Planning Committee until the Joint Core Strategy for the area of Cheltenham, Tewkesbury + Gloucester City has been finalised - All aspects of planning transport, environment and population estimates included in the housing target must be verified first.
- This application would have a hugely negative impact on the local community if granted.

Name [redacted] Ref. 13/01605/OUT

Address 40 Moorend Cresc, Leckhampton, Cheltenham

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PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

How many more houses do you Councillors want to build in Leckhampton? We pay your wages and the people of Leckhampton DONT WANT these houses The roads can't take anymore traffic, the Schools are full & Where are the NEW JOBS in Cheltenham to Justify these houses

Name [redacted]

Ref. 13/01605/OUT

Address 15 The Close, Leckhampton
Cheltenham

...LT
24 OCT 2013
...MENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

This proposal is bound to end in problems — our population is one (leading to the objections list). — There have been problems in the past over No. of vehicles currently using existing roads —

Not only will vehicles exit by the Shurdington Road, but back to Leckhampton also — which has a 'bottle neck' at times by the A-Rd Co-op roundabout — I agree with all the objections noted & ask that you Re-think again

Name [redacted]

Address Old Bath Rd.

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

BUILT
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Comments & Observations on 650 House Application on Leckhampton Green Fields

- Shurdington Road is already over congested.
- estimated 1000 extra vehicles will compound problem.
- air pollution levels break EU levels in winter months this will only get worse.
- being a local cyclist this will make my daily commute more dangerous and unpleasant.
- As soon to be first time parents we're very concerned over schools places,
- Senior schools are already oversubscribed with no plans to expand.

Name [redacted] Ref. 13/01605/OUT

Address 8 PEREGRINE ROAD, GL53 0LR

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PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably ~~to January 2014~~)

Comments & Observations on 650 House Application on Leckhampton Green Fields

No Coherent argument has been forwarded as to why a green field site is proposed rather than a brown field site

This plan is contrary to the lib dem manifesto which claimed to protect the proposed site

The additional traffic will spoil the reason why we bought a house in this area in the first place

Name [redacted]

Address 15 Hayward Rd

Ref. 13/01605/OUT

BUILT

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ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I would like to see the Rationale for building so many Homes in a Relatively Small Spa Town. The chaos this will cause to an already very congested dangerous Shurdington Road cannot be underestimated. I take this route every day and at Rush hour this is a very very Slow Road. I am concerned about the ability of Senior Schools to take children in - Barnesdale is already an extremely large School. I hope this is not a Government initiative but the Lib Dems tell of hype!

Name [redacted]

Ref. 13/01605/OUT

Address 2 JOHN MOORE GARDS CHELTENHAM.

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PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

The cost to the environment of an extra 650 houses would be enormous. The roads in this area are already extremely busy & could not sustain the extra vehicles the houses would bring. The pollution levels in water are already above EU levels. There are no senior schools in the area to accomodate the new development. The fields are a place of beauty that contain much wildlife and are widely used by lots of walkers, myself included.

Name [redacted]

Address 2 Evelyn Terrace Leckhampton

Ref. 13/01605/OUT

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PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I am writing to OBJECT to this application. 650 houses is going to create too much extra traffic on Shurdington Rd., Church Road and Bath Rd., particularly during the rush hour.
It will destroy beautiful fields with a lovely view up to the hill and looking down you will see just tiled roofs and tarmaced roads and street lights.
There are not sufficient places at secondary Schools in this area. This development could mean 400 extra children. Totally unsustainable!

Name [redacted]

Address BATH ROAD LECKHAMPTON

Ref. 13/01605/OUT

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ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION ~~KIDNAPPERS LANE~~
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I am very concened by this outline planning application. This number of houses, retail units and other buildings are not appropriate on these green fields and in this setting so close to an AONB. These particular fields are so separate from the town that over 1000 more cars will take to the nearby roads - adding to the ~~&~~ shegment stationary traffic on Shurdington Rd and congestion on Church Road. Air pollution, speeding etc. will also be an added problem for Church Road which already experiences these problems

Ref. 13/01605/OUT

Please do not create such an ugly settlement on such a beautiful site - what is driving this?

Name [redacted]

Address FOXFIELD HOUSE
CHURCH ROAD
LECKHAMPTON
GLOS. GL53 0QJ

BUILT
Rcvd 21 OCT 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I am not happy with this outline planning application because it proceeded with the already already full transport system in the Leckhampton area will be unable to cope with traffic volumes in particular at peak times. Other parts of the environment such as schools will be further unable to cope.

Name [redacted]

Address 83 MOORLEND RD GL53 0HB

Ref. 13/01605/OUT

BUILT

Recd 21 OCT 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

My principal objection is that granting this application will ruin a beautiful area of countryside & be irreparable.
Whatever infrastructure arrangements are made, they will not cater for the increase in traffic problems on the Shurdington Road, a situation which is dire as it is at present.

Name [redacted]

Address 187, LECKHAMPTON RD
CHELTENHAM GL53 0AD

Ref. 13/01605/OUT

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Rec'd 21 OCT 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

THE A38 (STHRDINGTON ROAD) IS A NIGHTMARE AREADY AT "RUSH HOUR". THERE'S NO INFRASTRUCTURE TO SUPPORT THIS AND NO SECONDARY SCHOOL PLACES.

THIS HASN'T BEEN THOUGHT THROUGH

Name [redacted]

Address 36 MOORLAND ST. GL53 0ET

Ref. 13/01605/OUT

BUILT
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PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

TO DEVELOP THIS AREA BENEFITS ONLY THOSE WITH A FINACIAL INTREST IN DOING SO. BEAUTIFUL, PEACEFUL SEMI-RURAL AREA WHICH IS CLEARLY IMPORTANT TO THE PEOPLE OF CHELTENHAM HATHERLEY IS NOW JUST LITTER STREWN URBAN SPRAWL WITH POORLY MAINTAINED ROADS - VITAL THAT LECKHAMPTON DOES NOT GO THE SAME WAY. TO INTRINGE ON ANY MORE SEMI-RURAL AREAS IS TOTALLY UNNECESSARY & UNACCEPTABLE SHOWS PREJUDICE AGAINST THOSE WHO WISH TO LIVE THERE.

[redacted]

Name [redacted] Ref. 13/01605/OUT

Address LARCH RISE LECKHAMPTON

BUILT
Recd 21 OCT 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

EXTRA Homes will be bringing a lot more Traffic through leckhampton which it hardly copes with already.
School's will be effected - where are the new places coming from - & are new ones being built !!!
Doctors will have for more patients - difficult to get appointments now.
No facilities at Emergency Dept in Cheltenham as its all being closed
Where are the Jobs coming from

Name [redacted]

Address [redacted]

Ref. 13/01605/OUT

BUILT
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PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Building more houses in an over populated area is folly. A new school for primary children should be a priority also secondary schools. [redacted] are needed to accomodate children already living in Leckhampton and the surrounding area.

Name [redacted]

Ref. 13/01605/OUT

Address [redacted] LECKHAMPTON

BUILT

Recd 21 OCT 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

1) This development is unnecessary as the area housing predictions are, at best, vague and at worst over-estimated
2) There is no proved need for this volume of building.
3) This is green-belt land. Enjoyed by locals and visiting tourists/walkers, who contribute to Cheltenham's economy.
4) The flood risks in this area are very real and are at a precarious level already (my own house flooded several times in Hall Road).
5) Traffic in Church Road is appallingly overloaded.
6) Local schools are full!!

Name [redacted] Ref. 13/01605/OUT

Address 5 Church Rd, GL53 0PS

BUILT
Recd 21 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

More open countryside and Greenbelt land used for housing - I object strongly to this!

Name [redacted]

Address 6 FAIRFIELD AVE, GL53 7PN

Ref. 13/01605/OUT

BUILT
Recd 21 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Building 650 houses on Leckhampton Green Fields will spoil this beautiful area forever. As a resident living in Church Road I am only too aware of the traffic congestion on this road, as well as Shurdington Road. There has already been development on this side of town with properties recently built on the old Delancey site and Cold Pool Lane. More building will have a devasting effect on the wildlife as well as increasing flood risks to the area, not to mention air pollution. How can Cheltenham cope with such an increase in population.

Name [redacted] Ref. 13/01605/OUT

Address 63 Church Road
GL53 0PF

BUILT

Rec'd 21 OCT 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

THE PROPOSAL WILL HAVE AN ADVERSE SIGNIFICANT AND PERMANENT VISUAL IMPACT ON LOCAL LANDSCAPE RESULTING IN A LOSS OF GREEN FIELDS, HABITAT CONNECTIVITY, AND LOCAL COMMUNITY IDENTITY. THE EXISTING SENIOR SCHOOLS WILL NOT BE ABLE TO ACCOMODATE THE INCREASE IN PUPILS FROM THE PROPOSED DEVELOPMENT AND AS THE LOCAL SENIOR SCHOOLS ARE ALREADY UNDER PRESSURE WITH EXISTING PUPIL FORECASTS REGARDING NEW YEARLY INTAKES, ANY FURTHER INCREASE WILL BE SIGNIFICANTLY DETRIMENTAL; RESULTING IN POTENTIAL ADVERSE CHANGES TO THE EXISTING CATHMENT AREAS AND -

Name [redacted] Ref. 13/01605/OUT

Address 30 HALL ROAD, GL53 0HE

-CAUSING PUPILS TO HAVE TO TRAVEL TO SCHOOLS OUTSIDE THE LOCALITY.

BUILT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

COMMENT

Comments & Observations on 650 House Application on Leckhampton Green Fields

On Coopers Edge at Brockworth, there are very many houses built recently and still not sold, I don't believe we need the houses proposed for Leckhampton at all.

The roads are in a dreadful condition all over Cheltenham, why have at these been attended to?

Name [redacted]

Ref. 13/01605/OUT

Address 64 Westbourne Rd.
Leckhampton Cheltenham GL53 9EW

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

34,000 new houses is too many! What happened to the plan for 17,000 on Brownfield sites? This degree of development on green field sites is a tragedy for our area and not even necessary according to recent research. The JCS should be completed in all its stages before the planning application is considered

BUILT
18 OCT 2013
ENVIRONMENT

Name [redacted] Ref. 13/01605/OUT

Address 20 Moorland Cres GL53 0EL

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

WE FULLY SUPPORT THE OBSERVATIONS AND OBJECTIONS REGARDING THE ABOVE PLANNING APPLICATION SET OUT BY THE LECKHAMPTON GREEN LAND ACTION GROUP.
WE ARE PARTICULARLY CONCERNED ABOUT THE INCREASED TRAFFIC IN THAT AREA AND THE LOSS OF COUNTRY SIDE.

BUILT
21 OCT 2013
ENVIRONMENT

Name [redacted]

Ref. 13/01605/OUT

Address 2 GREATFIELD DRIVE, CHELTENHAM GL53 9BU

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

The area cannot cope with such a development. The roads are already full up, there'll be flooding, there's no secondary school capacity. Cheltenham needs to keep the area "green" and undeveloped

BUILT
21 OCT 2013
ENVIRONMENT

Name [redacted]

Ref. 13/01605/OUT

Address [redacted]
Leckhampton Farm Court
Cheltenham GL51 3GS

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

This proposal is far far too many houses
The infrastructure is not suitable and never
will be. The roads cannot take any more traffic
Even with a new primary school there will not be
enough places for the children

BUILT
Recd 21 OCT 2013
ENVIRONMENT

Name [redacted]

Address Naunton Way

Ref. 13/01605/OUT

BUILT

Recd 21 OCT 2013

ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

The existing roads will not cope with the increased traffic i.e 2 cars per house. There will have to be another surgery for Doctors as existing ones cannot cope now. Schools will need to be built. Builders only want to build 3 or 4 bedroomed houses - 2 beds for young people are not built except social housing which in many cases is how the builders get permission!! All brown field sites should be used & perhaps builders should have to develop one per every green belt development.

Name .....

Address .....

Ref. 13/01605/OUT

BUILT

Rec'd 21 OCT 2013

ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I am writing to express again my objection in the planning application Kidnappers Lane 13/01605/OUT

Leckhampton does not have the infrastructure for this level of development, the Shurdington Road is already at capacity and will not take an approximate additional 1000 cars.

The Local Senior schools are already oversubscribed, so Children will have to go to schools further away, again adding to the volume of traffic.

Air pollution is also another concern, and with the proposed developments this will only make matters worse. There will also be the increased risk of flooding. A brownfield first policy must be adopted, if we can regenerate run-down urban sites, this will preserve the open countryside.

With this level of development you will change the look and feel of Leckhampton; this is NOT what the local people want. You must reconsider the application and get verification on the [redacted] population estimates contained in the housing targets.

Name [redacted] Ref. 13/01605/OUT

Address 18 PEREGRINE ROAD, LECKHAMPTON, CHELTENHAM, GL53 OLL.

BUILT

Rcvd 21 OCT 2013

ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I am deeply concerned about the vast numbers of houses and amenities that are being proposed for Leckhampton. As a daily commuter on the Shurdington Rd I know that that road could not cope with extra traffic. During rush hours it comes to a standstill and when there are heavy rains it floods + the road cannot cope.

Name [redacted]

Address 176, Leckhampton Rd.

Ref. 13/01605/OUT

11 Arden Road,
Cheltenham, Glos
GL53 0HG

BUILT
Recd 23 OCT 2013
ENVIRONMENT

17th October, 2013.

CBC Planning,
Municipal Offices,
Cheltenham,
GL50 9SA

Dear Sirs,

Outline Planning Application Ref: 13/01605/OUT
Kidnappers Lane and Small Holdings

1. This application is premature, and should not go before the Planning Committee until the Joint Core Strategy for the area of Cheltenham, Tewkesbury and Gloucester has been finalised and accepted by the Inspector.

2. All aspects of planning, transport, environment and the population estimates contained in the housing targets must be verified before consideration of any application by the Planning Committee.

3. Various aspects of this planning application, are completely unacceptable:

i) 650 houses alone, exiting onto the Shurdington Road will cause another 1,000 or so vehicles entering a road system that has already been described by another developer, as broken. Add to this the extra chaos which will be caused by all the traffic entering the area for the GP surgery, school, care home etc. Only a madman would even suggest it. This is why it would be totally irresponsible to consider this application prior to the traffic/transport modelling results being available.

ii) Air pollution levels already break EU levels in the Winter months on Church Road, and the A46. The whole of Cheltenham has been made an Air Quality Management Area in response to the problem.

iii) The open countryside of this area has immense value to wildlife, biodiversity and the people of Cheltenham demonstrate this as it is a favourite walking and recreation area for many of the Cheltenham people and many tourists to this area, will be found walking here, with a map hanging from chains around their necks.

For this reason, Leckhampton with Warden Hill Parish Council,

has placed before the local Councils, a request for consideration of a Local Green Space area, all in compliance with the NPPF, for much of the area that the Developers now wish to build over. Full details of this proposal should be favourably considered, before agreeing to this Application.

iv) It is understood that if this Application were approved, the primary school would not be built until the second phase of the development was complete. In the meantime, where would the children go to school?. I understand there are few if any, vacancies elsewhere. Also there are insufficient senior school places, in fact, the secondary school situation is already in crisis. There is a huge outcry about lack of facilities for those already living in the area, especially when Pates bring in children from Wales and push out children here already.

v) Much distress will be caused, particularly to older residents,by moving the Doctors' surgery away from Moorend Park Road. There has already been uproar over the idea of it.

These are just a few of my objections to an ill considered planning application.

I reiterate, this application should be turned down as being premature, until the Joint Core Strategy has been thoroughly checked for accuracy and finalised and approval has been given by the Inspectorate. Also the Parish Council's request for a Local Green Space, for this area should be favourably considered before granting any housing application around the area.

Please listen to the people who live locally, not the developers nor Government Ministers, who don't even know the area and its special amenities.

Yours faithfully,

[redacted]

[redacted]

57 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PF
Email: elizabethpimley@gmail.com

BUILT
Recd 23 OCT 2013
ENVIRONMENT

22nd October 2013

Dear Sir/Madam

Re. Objection to outline planning application (Ref 13/01605/OUT) on Kidnappers Lane & The Small Holdings, Leckhampton

As a local resident and professional Ecologist, I object to the proposed development off Kidnappers Lane and the small holdings area, Leckhampton, Cheltenham, which amounts to approximately 33ha. Clearly the creation of 650 houses, retail units, offices, care home and a primary school will radically alter the rural character of Leckhampton, with the loss in quality of life for local people and a reduction in property values as the area becomes less desirable to live in with greatly reduced accessible greenspace, inflated traffic levels (estimated 1000 extra vehicles) leading to gridlocked roads (particularly Shurdington Road and Church Road) with associated raised levels of air pollution (which already break EU levels in Church Road and Shurdington Road) and over-use of public open spaces within Leckhampton by the inflated population.

Specific documented support for retaining the green fields around Leckhampton as greenspace comes from the Entec Greenbelt Review (May 2011), which recommended that the farmland south of Farm Lane be included in the Greenbelt and marked RED – no development. The AMEC Joint Core Strategy Green Belt Assessment (September 2011) reinforced this view by assessing land to the south-west of Leckhampton (west/south-west and east/south-east of Farm Lane) as having the strongest case for inclusion in green belt.

Further support comes from the National Planning Policy Framework's new 'Local Green Space' designation, for which the fields south of Leckhampton provide a perfect fit. The Green Areas Designation gives local people an opportunity to protect green spaces that have significant importance to their local communities. Further reference to this is made in the Government's Natural Environmental White Paper. The Natural Choice: Securing the value of nature (2011)[1]. With this in mind a Leckhampton with

[1] Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special

Warden Hill Parish Council Neighbourhood Planning NPPF Concept Plan & Local Green Space Application[2] has been completed and submitted to the Council. A summary of the greenspace application is provided as an appendix to this letter as it is of direct relevance to the objection against the development and I hope it will be given thorough consideration by the planning officers.

In relation to the loss of greenspace, recent research demonstrates the health benefits to people who live near areas of green space (e.g. Natural England's Natural Health Service initiative of 2009; The White Paper 'The Natural choice: securing the value of nature', presented to Parliament in June 2011 and outlining governmental aims). These aims have been incorporated into Natural England's Accessible Natural Greenspace Standard (ANGST) which provides a series of benchmarks for ensuring access to natural green spaces near to where people live.

The green fields south of Leckhampton fulfil the ANGST criteria and provide communities that are some distance from Leckhampton Hill some much needed green space which is easy to access and walk across (in contrast to the steeper slopes of Leckhampton Hill) for less able-bodied members of the community, such as the physically disabled, the elderly and parents with young children. (The green fields around Leckhampton also reduce visitor pressure/disturbance on the Leckhampton Hill Site of Special Scientific Interest.)

In addition to the aforementioned issues, the development will inevitably have a detrimental impact on local wildlife and habitats that support them. The area proposed for development comprises a collection of semi-improved grassland meadows, several traditional orchards and small holdings bordered by numerous species-rich hedgerows and trees composed of native species (many of which are mature), with two streams traversing the area. As such these habitats provide a refuge for a variety of wildlife, many of which include species such as hedgehog and toad (both UK Biodiversity Action Plan (BAP) priority species), grass snake, slow worm, a variety of bat species, the latter three being protected under UK and/or European Wildlife legislation. Reptile surveys revealed there to be a medium population of slow worm in the area (Hankinson Duckett Associates 2011, E. Pimley, pers. comm.) and bat surveys revealed roosts for common pipistrelle, noctule and Natterer's bats, as well as use of the site by these species (as well as soprano pipistrelle) for foraging and commuting (Hankinson Duckett Associates 2011, LEGLAG 2011, 2012).

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circumstances. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used: where the green space is in reasonably close proximity to a centre of population or urban area; where the green area is demonstrably special to a local community and holds a particular local significance because of its beauty, historic importance, recreational value, tranquillity or richness of its wildlife; where the green area concerned is local in character and is not an extensive tract of land; and if the designation does not overlap with Green Belt.

[2] Mears *et al.* 2013. Leckhampton with Warden Hill Parish Council Neighbourhood Planning NPPF Concept Plan & Local Green Space Application. July 2013.

The development proposals will result in the loss of several old orchards (A UK BAP habitat) and the associated species assemblage of plants and wildlife that has developed over the years. The site contains numerous species-rich hedgerows, some of are important under the Hedgerow Regulations 1997 and some of these will be lost due to the development. These hedgerows provide important commuting/foraging routes for bats as well as shelter for a variety of small mammals and amphibians.

Several species of birds of conservation concern listed under the RSPB Red List including skylark, song thrush, house sparrow and linnet, as well as 11 species listed under the RSPB Amber List were recorded on the site during various bird surveys over the years (Hankinson Duckett Associates 2011, T. & F. Meredith, pers. comm.). The loss of the orchards and hedgerows will reduce the available habitat for song thrush, house sparrow and linnet; while the loss of the semi-improved fields will result in a loss of habitat for skylark which require large areas of open space to nest thereby preventing further use of the fields by breeding skylark. While two breeding pairs were recorded within the site (Hankinson Duckett Associates 2011), as progressively more grassland fields are built on across the county and the UK, the available habitat for this declining species is diminishing with negative consequences for their long-term survival. Hence the pressing need to preserve areas of natural green open space such as the fields south of Leckhampton in order for the long-term survival of this species.

In summary, my main objections to the development relate to the huge increase in traffic which the area cannot accommodate and associated rise in air pollution to detrimental levels, the loss of much easily accessible open space for the Leckhampton communities not to mention the loss of valuable wildlife habitat and its negative impact on the rural character of the area. In my opinion it is essential that the application should not be given further consideration by the planning committee until the Joint Core Strategy for the Cheltenham, Gloucester and Tewkesbury area has been finalised and accurate traffic/population growth estimates have been verified. In addition, the development proposals should be reviewed in the light of the recently created Local Greenspace Application in accordance with National planning guidance in the form of the NPPF[3].

Should you require further information regarding any of the points I have raised in this letter, please let me know.

Yours sincerely

[redacted]

[3] National Planning Policy Framework published on 27th March 2012

Appendix 1. Leckhampton with Warden Hill Parish Council Neighbourhood Planning NPPF Concept Plan & Local Green Space Application. July 2013.

Executive Summary

In 2012, Leckhampton with Warden Hill Parish Council (LWWH PC) and Shurdington Parish Council set up a joint neighbourhood forum (JNF) for the purpose of developing a neighbourhood plan for the area covered by the two parishes. This submission, which has been led by LWWH PC with support from Shurdington Parish Council, is the first output from the work of the JNF.

Both parish councils have been greatly concerned by the proposals for large scale development on the Leckhampton Green Field Land. They have strongly and consistently opposed such development for reasons that are brought out in this submission: the amenity value of the land; its great importance to the view from Leckhampton Hill; the history of Leckhampton village, dating back over a 1000 years; the ecology and wildlife in the area; the problems of traffic congestion, flooding and the shortage of secondary school places. LWWH PC has made detailed submissions with strong evidence to the JCS and now fears that decisions could be imposed on the area that are very damaging not only to the parishes but to Cheltenham as a whole.

Accordingly, LWWH PC has assembled the expert evidence presented in this submission both of the value of the Leckhampton land and of the dangers facing local people and the Cheltenham area, particularly from the severe traffic problems that would result from development in Leckhampton. Expert summaries of the history of the area and of its ecology and wildlife are included in the submission in sections 3.1 and 3.2. Sadly, until the 1960s, scant importance was attached to preserving the UK's historical heritage and many buildings and areas were destroyed. The cultural and economic value of historical areas is now much better understood and rightly protected. The ecological and wildlife survey prepared for the Council by three experts shows the rich diversity of habitats. Part of the aim for the Local Green Space is to enhance its value to Cheltenham as a wildlife area.

The Council has gathered the views of local residents about the future of the Leckhampton land. The survey showed overwhelming public opposition to development. Similar findings have come from polls conducted by Leglag.

The traffic surveys, model and analysis have involved considerable work by LWWH PC. The findings have been independently verified by traffic consultant Rob Williams, a director of Entran Ltd and well respected by Mark Power of Gloucestershire Highways, from whom the Council has also received valuable advice. The traffic model allows various scenarios to be examined. It shows that development on the scale currently being proposed would cause the A46 traffic queue to extend to the A417 and potentially to the M5. The time it would take to commute into Cheltenham would impose a great economic cost and would make it hard for people living south of the A417 to work in Cheltenham.

Even tighter constraints are imposed by two other factors discussed in Annex 2: the need, confirmed by Mark Power, to prevent any major increase in traffic levels on Church Road during the morning peak period, and secondly the pollution levels on the A46, particularly around the Moorend Park Road intersection, which exceed

permitted EU levels. These two factors leave little or no scope for sustainable development on the Leckhampton Green Field Land, particularly when taken in conjunction with the rise in general UK traffic levels from 2015-2025 now predicted by the Department of Transport. LWWH PC has also looked at possible new employment sites around Cheltenham being considered by the JCS to check that these do not materially alter this conclusion.

Under the NPPF a neighbourhood plan cannot be used to prevent sustainable development. Having regard to this, LWWH PC has investigated various options for the size and boundary of the Local Green Space, as described in Annex 2. For the reasons explained in Annex 2, the Council resolved at its public meeting on 25 July 2013 to include all of the Leckhampton Green Field Land in the LGS. This decision has been supported by Shurdington Parish Council in a draft letter of endorsement which is included at Annex 1 and which Shurdington Parish Council intends to formally ratify at its next public meeting.

This submission seeks to make a positive input into the Joint Core Strategy on the current strategic site allocation and to contribute to the process of updating the Cheltenham Borough Council and Tewkesbury Borough Council local plans to be NPPF-compliant.

CBC Planning
Municipal Offices
CHELTENHAM
GL50 9SA

Rcvd 24 OCT 2013

4 Brizen Lane
Leckhampton
CHELTENHAM
GL53 0NG

23 October 2013

Dear Sirs,

Outline Planning Application (REF. 13/01605/OUT)

I strongly object to the outline planning application, Ref 13/01605/OUT, as submitted by agents for Bovis Homes Limited and Miller Homes Limited

Accordingly, I urge Cheltenham Borough Council to reject the application for the following reasons:-

1. **Traffic Congestion - Health Risks & Unsustainability**
   i. Traffic congestion on the A46 approach to Leckhampton is already a recognised problem and becomes very severe during peak hours. The high levels of traffic, on the A46 and Church Road, create a health risk through damage to air quality, which falls below acceptable levels in winter months, contributing to the designation of Cheltenham as an Air Quality Management Zone.

   NB. The International Agency for Research on Cancer (IARC), the cancer arm of the World Health Organisation, has officially classified air pollution from traffic as a definite cause of cancer. **IARC Scientific Publication 161 "Air Pollution and Cancer" - October 2013**.

   ii. Previous reports by HM Inspectors have acknowledged that there is little scope for mitigating the impact of additional traffic on the A46 Shurdington Road and/or Church Road, and have rejected earlier development proposals in the area on the grounds of the unsustainable impact of additional traffic from proposed sites.

   iii. The additional traffic generated by the proposed 650 dwellings (i.e. up to an additional 1,000 vehicles based on the existing cars per household ratio) would exacerbate the current problems, resulting in gridlock on the A46 at peak times and a further increase in air pollution levels.

2. **Flood Risk**
   i. Flooding severely impacted parts of Warden Hill during 2007 but, despite the building of only a minimal flood protection scheme, the area would still be at significant risk of further flooding if adjacent land was built on. We need the existing fields to act as a natural soak-away at times of heavy rainfall. It is now accepted that periods of extreme rainfall are becoming more frequent as a result of climate change.

3. **Shortfall in School Capacity**

   i. Local secondary schools have been oversubscribed for some time and do not have the capacity to provide for significant additional demand. For example, both Bournside and Balcarras have indicated that they have no plans to expand despite operating close to full capacity now.

4. **Amenity Value**

   i. The proposed site currently provides a "green lung" on the edge of Cheltenham, comprising farm land, allotments and a number of well used footpaths. The land and boundary hedges are currently a haven for a wide range of wild life. The existing land usage delivers high natural landscape and amenity value for local residents to enjoy through their use of the footpaths and allotments.

   ii. Research has shown that the natural amenity value of green spaces provides both physical and mental health benefits for local residents. (e.g. Barton & Pretty 2010, Pretty et al 2005, Bird 2004).

   iii. This natural amenity value would be lost forever if the proposed development were approved.

   iv. In addition, the special character of Cheltenham would be diminished by more development along the currently attractive A46 approach.

5. **The Proposal is Premature**

   i. For the reasons set out above the proposal should be rejected now, but in any event it should not even be considered for approval in advance of the agreement of the Joint Core Strategy (JCS) by participating Authorities.

   ii. The current ***draft*** of the JCS remains subject to further consultation and many questions. A number of key underlying statistics (e.g. re traffic modelling & population estimates) require verification before the final plan can be produced.

Please reject the Outline Planning Application (REF. 13/01605/OUT).

Yours Sincerely

[redacted]

11 Brizen Lane
Leckhampton
Cheltenham
GL53 ONG
14/10/2013

CBC Planning
Municipal Offices
Cheltenham Borough Council
Cheltenham
GL50 9SA

BUILT
Recd 24 OCT 2013
ENVIRONMENT

Objection to planning application

13/01605/OUT

Dear Sir/Madam,

May I please register my objection to any proposal or plans to build in Leckhampton.

My objections are as follows:

This site is continuous to and merges with the Leckhampton Hill landscape supporting the various species and bio diverse ecological niches of this AONB. Birds of prey are frequently seen in this site. Rare water shrews have been documented to live in the site. Regularly woodpeckers, Roe deer, pheasants, foxes, hares are spotted along with a huge variety of smaller mammals and birds and an extensive diversity of butterflies and insects. Farm animals like sheep, horses and pigs add to this very rural setting, which is very much appreciated not only by regular ramblers and visitors but also by the Leckhampton community.

The whole of the view of the Leckhampton Hill landscape would be irretrievably lost for future generations if this area were not protected.

Flooding of this site has been photographically confirmed and irrefutable. There was flooding onto Shurdington Road only recently.

The traffic problems along the Shurdington Road would only be exacerbated. As it is traffic is bumper to bumper and at a standstill at peak times. It is already impossible to turn right onto Shurdington Road from Kidnappers Lane most times of the day,meaning that traffic has to go left down Shurdington Road to turn around at the roundabout and travel back up Shurdington Road in order to head to Cheltenham centre. Local residents do not want the situation to be made worse by building new houses.

The traffic congestion of the A46 is well documented and Church Lane serves as testimony to the previous over building locally.

It is a well known fact that the local primary and secondary schools are oversubscribed and unable to meet the present needs of the community.

Similarly local medical services are already over stretched. The proposed new GP Surgery does not represent the establishment of a new GP Practice but is in fact merely the relocation of a pre-existing practice from its current premises to the new building. There is no NHS dental provision in this area.

Similarly there is scarce employment in the areas. Residents have to travel to their places of employment, mostly by car. Likewise they need to travel to the shops, largely by car. The location is too far from shops to expect people to walk or cycle when doing shopping for a family.

There would be an increase in levels of pollutants and areas further down the Bath Road have been deemed to have unacceptable levels of pollution already. This has a detrimental effect on those with lung diseases.

Lack of green spaces has been linked to increased levels of mental illness.

There would be more noise pollution, more light pollution and more dwellings in proximity to high voltage electrical cables.

The construction of houses in the area would have a devastating effect on Leckhampton. It would lose its character and identity. The development would be seen as a concrete jungle undermining the identity of Leckhampton and destroying its rural setting.

For all these reasons I object to any plans to build on this land.

Yours faithfully,

[redacted]

11 Brizen Lane
Leckhampton
Cheltenham
GL53 ONG
14/10/2013

CBC Planning
Municipal Offices
Cheltenham Borough Council
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Rcvd 24 OCT 2013
ENVIRON...

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[redacted]

11 Brizen Lane
Leckhampton
Cheltenham
GL53 ONG
14/10/2013

CBC Planning
Municipal Offices
Cheltenham Borough Council
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BUILT
Recd 24 OCT 2013
ENVIRONMENT

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Yours faithfully, [redacted]

11 Brizen Lane
Leckhampton
Cheltenham
GL53 ONG
14/10/2013

CBC Planning
Municipal Offices
Cheltenham Borough Council
Cheltenham
GL50 9SA

BUILT
RECD 24 OCT 2013

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13/01605/OUT

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For all these reasons I object to any plans to build on this land.

Yours faithfully,

[redacted]

Recd 22 OCT 2013
ENVIRONMENT

CBC Planning
Municipal Offices
CHELTENHAM
GL50 9SA

4 Brizen Lane
Leckhampton
CHELTENHAM
GL53 0NG

21 October 2013

Dear Sirs,

Outline Planning Application (REF. 13/01605/OUT)

I strongly object to the outline planning application, Ref 13/01605/OUT, as submitted by agents for Bovis Homes Limited and Miller Homes Limited

Accordingly, I urge Cheltenham Borough Council to reject the application for the following reasons:-

1. **Traffic Congestion - Health Risks & Unsustainability**
   i. Traffic congestion on the A46 approach to Leckhampton is already a recognised problem and becomes very severe during peak hours. The high levels of traffic, on the A46 and Church Road, create a health risk through damage to air quality, which falls below acceptable levels in winter months, contributing to the designation of Cheltenham as an Air Quality Management Zone.

   NB. The International Agency for Research on Cancer (IARC), the cancer arm of the World Health Organisation, has officially classified air pollution from traffic as a definite cause of cancer. **IARC Scientific Publication 161 "Air Pollution and Cancer" - October 2013.**

   ii. Reports by HM Inspectors have acknowledged that there is little scope for mitigating the impact of additional traffic on the A46 Shurdington Road and/or Church Road, and have rejected earlier development proposals in the area on the grounds of the unsustainable impact of additional traffic from proposed sites.

   iii. The additional traffic generated by the proposed 650 dwellings (i.e. up to an additional 1,000 vehicles based on the existing cars per household ratio) would prove equally unacceptable and unsustainable.

2. **Flood Risk**
   i. Flooding severely impacted parts of Warden Hill during 2007 but, despite the building of a minimal flood protection scheme, the area would still be at significant risk of further flooding if adjacent land, including the proposed site, was built on.

3. **Shortfall in School Capacity**
   i. Local schools have been oversubscribed for some time and do not have the capacity to provide for significant additional demand. For example, both Bournside and Balcarras have indicated that they have no plans to expand

despite operating close to full capacity now. These schools could only absorb students from the proposed development through redefining their catchment areas to the detriment of existing residents of Leckhampton.

4. **Amenity Value**

   i. The proposed site currently provides a "green lung" on the edge of Cheltenham, comprising farm land, allotments and a number of well used footpaths. The land and boundary hedges are currently a haven for a wide range of wild life. The existing land usage delivers high natural landscape and amenity value for local residents to enjoy through their use of the footpaths and allotments.

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   iii. This natural amenity value would be lost forever if the proposed development were approved.

   iv. In addition, the special character of Cheltenham would be diminished by more development along the currently attractive A46 approach.

5. **The Proposal is Premature**

   i. For the reasons set out above the proposal should be rejected now, but in any event it should not even be considered for approval in advance of the agreement of the Joint Core Strategy (JCS) by participating Authorities.

   ii. The current ***draft*** of the JCS remains subject to further consultation and many questions, with a number of key underlying statistics requiring verification (e.g. re traffic modelling & population growth) before a meaningful (JCS) plan can be submitted for approval.

Please reject the Outline Planning Application (REF. 13/01605/OUT).

Yours Sincerely

[redacted]

13/01605/OUT

Land at Leckhampton

Representations

Batch 4

BUILT
Recd 16 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I STRONGLY OBJECT TO THE DEVELOPMENT PROPOSED IN THIS PLANNING APPLICATION ON THE GROUNDS THAT THERE ARE SERIOUS ISSUES OF TRANSPORT AND OTHER INFRASTRUCTURE IN THE AREA WHICH NEED TO BE ADDRESSED IN THE JCS BEFORE ANY INDIVIDUAL APPLICATIONS ARE CONSIDERED. IT WOULD THEREFORE BE PREMATURE TO CONSIDER THIS APPLICATION BEFORE THE JCS IS FINALISED

Name [redacted]

Address 17 ALLENFIELD RD
LECKHAMPTON, GL53 0LX

Ref. 13/01605/OUT

BUILT
Recd 10 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Objections on attached Sheet

- **An additional estimated 1000 extra vehicles will ALL exit onto the Shurdington Road.**
- **Another developer has already described this road network as 'broken' and 'is over capacity', the argument being used is that the network is already broken and we cannot make it any worse. This is absolute madness, and precisely why we need the JCS transport plan and traffic modelling for Leckhampton before this application goes to planning committee.**
- **Air Pollution levels already break EU levels in the winter months on Church Rd and the A46; the whole of Cheltenham has been made a Air Quality Management Area in response to the problem.**
- **There are insufficient senior school places even now, both Balcarras and Bournside have no plans to expand but catchment areas may have to change to accommodate the new development.**

Name [redacted]

Ref. 13/01605/OUT

Address Long acre Kidnappers Lane

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

For reasons already stated on JCS card e.g. transport, environment, planning plus lack of verified figures no action should be taken

Name [redacted]

Address Hillards Drive, Cheltenham

Ref. 13/01605/OUT

BUILT ENVIRONMENT
Recd 28 OCT 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 28th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I would like to note my objection to the application of 650 houses off Kidnappers Lane and the small holdings. This development will cause huge problems for the infrastructure of Leckhampton, especially for the road system. The developers have us believe it is a solvable solution, but underplaying the amount of extra vehicles and fostering with one way systems cannot fix this serious problem. The access into Cheltenham will become impossible, and residents of Church road and Shurdington road will have there quality of life seriously compromised.

Name [redacted]

Address 57 Road Cheltenham GL53 0PF

Ref. 13/01605/OUT

BUILT
Recd 18 OCT 2013
ENVIRON

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

WE SHOULD DEVELOP BROWNFIELD SITES BEFORE BUILDING ON GREEN FIELDS

THE ROADS ARE ALREADY TOO CONGESTED AND THE AIR QUALITY NOT GOOD ENOUGH, ESPECIALLY IN RUSH HOURS

THERE ARE NOT ENOUGH SENIOR SCHOOL PLACES IN THIS AREA

3x Name [redacted]

Ref. 13/01605/OUT

Address 10 BRIZEN LANE, LECKHAMPTON

BUILT
Recd 18 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

This planning application should not be allowed to proceed for the following reasons.

① The JCS has still to be finalised. All major developments should be deferred until the final forecasts for population growth and housing numbers are confirmed.

② Within the locality the existing infrastructure cannot cope with the projected increase in vehicle numbers and the requirement for extra secondary school places.

③ A beautiful wild nature area would be destroyed and replaced by a 'rabbit-warren' development of houses

Ref. 13/01605/OUT

Name [redacted]

Address 14 BRIZEN LANE

BUILT
Recd 16 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION ON KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I have to say that the overall impression is that we have here DEVELOPERS looking for business profit.
The scheme is flawed in many ways
eg The huge traffic problems that will occur
The air pollution increase above acceptable limits.
School places — ? where are these secondary school places?
The elimination of green field site. And who/where are the people who will live & where will they work

Ref. 13/01605/OUT

Name [redacted]
Address [redacted] The Gateways Farm Lane GL53 0NN

BUILT
Recd 8 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

It would substantialy reduce local peoples enjoyment of the area.
Affect schooling for all local children
Why not 'Brown Fields' sites??

Name [redacted]

Address 11 Mead Road GL53 7DV

Ref. 13/01605/OUT

BUILT
Rec'd 28 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

It seems sensible for the Application to await the relevant investigations into transport, environment & population estimates.
Presumably if Kidnappers Lane into Church Rd & Shurdington Road is to be closed, then another access road will be built?
Pedestrians find it very difficult to cross the Shurdington Road & there will be a need for more pedestrian crossings / or over passes.
There is still no answer as to Secondary Schools.

Name [redacted] Ref. 13/01605/OUT

Address 12 Southcourt Close GL53 0DD

BUILT
Recd 16 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

It should not go ahead. The disruption caused by the construction phase will be widespread and badly affect the immediate area. The road network and general infrastructure is inadequate to support the development. The preservation of the green fields is critical to retaining the character of this part of one of England's most beautiful towns. It is wrong to build on green fields while there are brown field sites that can be used - your role should not be making it easier for developers to make more money, it should be to encourage regeneration and re-use of existing sites.. to avoid the urban sprawl endemic in [illegible] tourism-dependent economies.

Name [redacted]

Address 37 Charlton Lane

Ref. 13/01605/OUT

BUILT
Recd 28 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

NOT SUPRISED. I'M SURE THERE ARE A VAST MAJORITY AGAINST THIS DEVELOPMENT, YOU SHOULD ASK WHO ELECTED YOU AND WHAT MANDATE YOU HAVE FOR THIS EROSION OF OUR GREEN SPACES.

LISTEN TO YOUR CONSCIENCES, THIS DEVELOPMENT WILL MAKE LECKHAMPTON A WORSE PLACE TO LIVE FOR US ALL FOR MANY REASONS. IS THAT THE LEGACY YOU REALLY WANT TO LEAVE? DO THE RIGHT THING AND THROW IT OUT!.

Name [redacted] Ref. 13/01605/OUT

Address 57 CHARLTON AVE.

BUILT
Rece 6 OCT 2013
ENVIRON NT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

SO MANY HOUSES IN THIS AREA NOT NEEDED AS JOBS FAIL. PLENTY IN BISHOPS CLEEVE. CONGESTION TO TRAFFIC ON SHURDINGTON ROAD WOULD INCREASE, ALREADY ACCIDENT BLACK SPOT AND TOO BUSY IN RUSH HOURS. LOCAL FARMING AND ORGANIC MEAT BUSINESSES ADVERSELY AFFECTED — VERY MUCH AGAINST.

Name [redacted]

Ref. 13/01605/OUT

Address 41 FAIRFIELD RD LECKHAMPTON GL53 7PE

BUILT
Rec'd 16 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Shurdington Road already congested.
No Senior School in local area.

Name [redacted]

Address 11 Peregrine Rd
Cheltenham

Ref. 13/01605/OUT

MERESTONES RESIDENTS ASSOCIATION

1 Merestones Close, Cheltenham, Glos GL50 2ST

23rd October 2013

Planning Department
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham GL50 9SA

Email: [redacted]

Cheltenham Borough Council
Environmental Group
REC'D 25 OCT 2013
Date of Response
Type of Response
Initials of Responder
File Ref.

Dear Sir

Proposed development of 1.94ha land at Kidnappers Lane, Shurdington Road, Cheltenham
Planning ref: 13/01606/OUT

I write in connection with the above proposal on behalf of the Association, which represents around 200 households in the Merestones Road/Merestones Drive area. Whilst our area is situated a little way from the proposed development, we are certain to be affected in several ways if it proceeds, and a number of issues cause us concern.

Our thoughts and concerns largely revolve around three main areas:

Surface water drainage

The Hatherley Brook and its tributaries flows through the Merestones area, so is directly affected by surface water drainage from the proposed development site. We note the various proposals to create catchment ponds and the reference to discharge points Leckhampton 1,2,3. It is clear from the plans that Leckhampton 2 feeds immediately into the Hatherley Brook, and then through the Merestones area. What may not be so readily appreciated, however, is that Leckhampton 3 also flows through part of the Merestones estate to also join Hatherley Brook at a lower point, whilst still within the Merestones area. This means that the vast majority of surface water from the proposed site will combine together, and flow along much the same route.

Both streams (Leckhampton 2 & 3) have suffered from flooding in the past few years, (not just in 2007), and just a few hours continual rain is often sufficient to raise the water flows to concerning levels – this already happens several times a year. The situation is not helped by blockages caused by overgrown trees/fallen branches and undergrowth due to a complete lack of maintenance by the Borough Council over many years, and these can greatly restrict the free flow of water and lead to localised flooding. As an example, one particular blockage has been reported on two occasions (dates available) to no avail. Here one senses that there is a complete lack of clarity concerning areas of administrative responsibility between the Borough and Severn Trent, and we feel this is an opportunity to clarify these anomalies once and for all.

Whilst the proposed ponds in the new development may temporarily hold back any extreme volumes of water, the fact remains that all of this water will eventually have to flow down the same watercourses, and these volumes will inevitably be much greater than currently.

If these proposals proceed, without any additional work being undertaken downstream of the development, we believe there is a real risk of flooding, not just within our area, but also in the other areas further down the brook.

Traffic issues

The A46 Shurdington Road is currently a very busy route into and out of Cheltenham, particularly at peak times when queues of traffic build up in both directions. In both morning and evening peaks, there is usually a slow crawl of continual traffic in both directions, often extending several miles from the Brockworth by-pass through Shurdington and on into Cheltenham.
The proposal seeks to create a new junction between Woodlands Road (an already busy interchange) and Moorend Park Road, and will divert there not only all traffic from the new development, but also the existing traffic in the Kidnappers Lane area. This will create substantial volumes of vehicles at peak times, all trying to access Shurdington Road, in many cases crossing the existing outbound flow of traffic towards Cheltenham, almost certainly resulting in greatly increased congestion.

We believe more thought needs to be given to this aspect, and improvements made to local traffic systems to increase capacity and reduce delays, especially at junctions.

Schooling

Whilst the proposal includes some provision for new schools for younger children, it simply assumes that children of secondary school age will go to existing schools within Cheltenham. There is a suggestion that the nearest school is Bournside, and that it can be accessed via the St James' primary school area. As it is likely that many parents will use private vehicles to take their children to school, the impact upon traffic levels seems at best to have been put to one side, and at worst ignored completely. St James School itself is already scheduled to increase substantially in size over the coming years and is facing considerable pressures on vehicle access and parking, where already major issues are emerging. To encourage residents of the proposed new development to use the St James school route is nothing short of lunacy.

What is needed is a more coherent approach, which minimises any impact on traffic volumes arising from the school run.

Summary

This is a major development, which will have far reaching repercussions on existing local residents for many years into the future. Being aware of the Joint Core Strategy Agreement between the adjacent Local Authorities, and also future housing requirements, we are not against the proposal in principle, as we accept that some development will be necessary over the coming years.
We do believe, however, that there is needs to ensure that such a development takes into account the needs and lives of those already living in the area, and not just the landowners, developers and future homeowners of the proposed development.

In particular therefore, we strongly feel that the Council should:

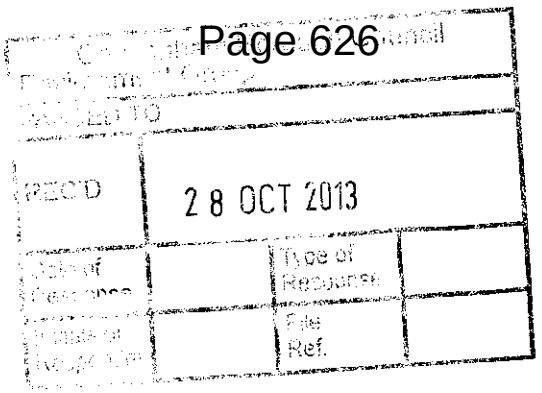
- Require the developers to deposit substantial commuted contributions to clear stream banks and undergrowth of all downstream watercourses, not just at construction stage, but also for the future. Thought should also be given to implementation of sensible long term landscaping schemes. This is necessary to ensure that existing residents downstream of the development do not have to pay the price of greater flooding.
- Insist upon a detailed look at overall traffic flows into and out of Cheltenham along the A46, and explore ways of improving these, taking into account the predicted additional traffic from the new development. The developers should be required to contribute towards the cost of such improvements.
- Require the developers to implement systems for the transport of secondary schoolchildren to avoid the use of private cars as much as possible. For example we view the provision of a free bus service from the development to Bournside, Balcarras & Pittville schools (journeys which already affect the Leckhampton area) essential.

We hope you will agree that our views are constructive, and that they can be taken into account when the application is being considered. Should you wish to consult with our committee on any point, please do not hesitate to contact us.

Yours faithfully

[redacted]

Chairman Merestones Residents Association



CBC Planning
Municipal Offices
CHELTENHAM
GL50 9SA

16 Treelands Close
Leckhampton
CHELTENHAM
GL53 0DF

24 October 2013

Dear Sirs,

Outline Planning Application (REF. 13/01605/OUT)

I strongly object to the outline planning application, Ref 13/01605/OUT, as submitted by agents for Bovis Homes Limited and Miller Homes Limited

Accordingly, I urge Cheltenham Borough Council to reject the application for the following reasons:-

1. **Traffic Congestion - Health Risks & Unsustainability**
   i. Traffic congestion on the A46 approach to Leckhampton is already a recognised problem and becomes very severe during peak hours. The high levels of traffic, on the A46 and Church Road, create a health risk through damage to air quality, which falls below acceptable levels in winter months, contributing to the designation of Cheltenham as an Air Quality Management Zone.

   NB. The International Agency for Research on Cancer (IARC), the cancer arm of the World Health Organisation, has officially classified air pollution from traffic as a definite cause of cancer. **IARC Scientific Publication 161 "Air Pollution and Cancer" - October 2013.**

   ii. Previous reports by HM Inspectors have acknowledged that there is little scope for mitigating the impact of additional traffic on the A46 Shurdington Road and/or Church Road, and have rejected earlier development proposals in the area on the grounds of the unsustainable impact of additional traffic from proposed sites.

   iii. The additional traffic generated by the proposed 650 dwellings (i.e. up to an additional 1,000 vehicles based on the existing cars per household ratio) would exacerbate the current problems, resulting in gridlock on the A46 at peak times and a further increase in air pollution levels.

2. **Flood Risk**
   i. Flooding severely impacted parts of Warden Hill during 2007 but, despite the building of only a minimal flood protection scheme, the area would still be at significant risk of further flooding if adjacent land was built on. We need the existing fields to act as a natural soak-away at times of heavy rainfall. It is now accepted that periods of extreme rainfall are becoming more frequent as a result of climate change.

3. **Shortfall in School Capacity**

   i. Local secondary schools have been oversubscribed for some time and do not have the capacity to provide for significant additional demand. For example, both Bournside and Balcarras have indicated that they have no plans to expand despite operating close to full capacity now.

4. **Amenity Value**

   i. The proposed site currently provides a "green lung" on the edge of Cheltenham, comprising farm land, allotments and a number of well used footpaths. The land and boundary hedges are currently a haven for a wide range of wild life. The existing land usage delivers high natural landscape and amenity value for local residents to enjoy through their use of the footpaths and allotments.

   ii. Research has shown that the natural amenity value of green spaces provides both physical and mental health benefits for local residents. (e.g. Barton & Pretty 2010, Pretty et al 2005, Bird 2004).

   iii. This natural amenity value would be lost forever if the proposed development were approved.

   iv. In addition, the special character of Cheltenham would be diminished by more development along the currently attractive A46 approach.

5. **The Proposal is Premature**

   i. For the reasons set out above the proposal should be rejected now, but in any event it should not even be considered for approval in advance of the agreement of the Joint Core Strategy (JCS) by participating Authorities.

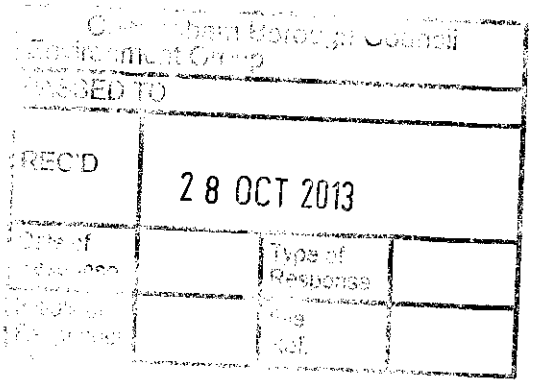
   ii. The current ***draft*** of the JCS remains subject to further consultation and many questions. A number of key underlying statistics (e.g. re traffic modelling & population estimates) require verification before the final plan can be produced.

Please reject the Outline Planning Application (REF. 13/01605/OUT).

Yours Sincerely

[redacted]

[redacted]



Alderman Robin MacDonald

Longacre

Kidnappers Lane

Cheltenham

GL53 0NR

15th October 2013

Dear Sir

As a former Borough Council and County Council for Leckhampton, and a member of the committee of Leglag and I wish to make the following general comments which are those that have been made by Leglag as I am unable to comment myself due to illness (see attached).

I have seen the master plan for the development of Leckhampton, and have the following comments concerning my property.

Any development the overlooks my property will be objected to. Thus the development at the front of Longacre which is described as medium development will be the subject of an objection if it involves properties of more that single height.

We have regularly maintained the grass verge (since 1987) between our hedge and the tarmac of road comprising Kidnappers Lane. Any attempt to transfer the legal title to the developers will be opposed.

The houses that are planned to b built at the rear on my property, separated by Hatherley Brook, will be on a higher level of ground which will be therefore comprised of concrete so when we are having heavy rain the brook most likely will flood on to our side.

Yours Faithfully

[redacted]

c.c. County Council , Developers

.eckhampton with Warden Hill Parish Council has put forward a Local Green Space application for the area (as part of their Neighbourhood Planning and is compliant with the NPPF), Cheltenham Borough Council has not given this application proper consideration.

- Kidnappers Lane into Church Road and Shurdington Road will be closed.
- An additional estimated 1000 extra vehicles will ALL exit onto the Shurdington Road.
- Another developer has already described this road network as 'broken' and 'is over capacity', the argument being used is that the network is already broken and we cannot make it any worse. This is absolute madness, and precisely why we need the JCS transport plan and traffic modelling for Leckhampton before this application goes to planning committee.
- Air Pollution levels already break EU levels in the winter months on Church Rd and the A46; the whole of Cheltenham has been made a Air Quality Management Area in response to the problem.
- There are insufficient senior school places even now, both Balcarras and Bournside have no plans to expand but catchment areas may have to change to accommodate the new development.

The JCS 'preferred option' is for 33,000 houses to be built across our much loved green spaces over the next 20 years, this will change forever the area in which we have chosen to live. Only two years ago, the local people requested housing targets of 16,200 with a strong brownfield first policy.

- Verification of the JCS population projection over the next 20 years, offered by the Office of National Statistics (ONS), has not been taken up. Instead the three councils are using interim, short-term figures, despite clear warnings from the ONS that birth rates could be over estimated.
- Cheltenham does not have the infrastructure for this level of development, school places, health services, transport and jobs are all under pressure. The transport/traffic modelling will NOT be available until AFTER the JCS consultation is complete. This is critical information for Leckhampton.
- If you look at what the 2011 census tells us, we currently build many more houses to cover the inwards migration of 2614 per year, five times higher than our natural increase in population of 511 for the whole county, and this is happening at a time when we are losing jobs in Cheltenham. Between 1991 and 2009 the number of jobs in Cheltenham fell by 7,600 (all data from the JCS Evidence Base).
- Evidence is needed from the Strategic Housing Market Assessment (SHMA) a vital source of information on the housing need.
- The LIB DEM controlled council has not stated a clear brownfield first policy prior to the JCS becoming finalised next year, this greatly affects Leckhampton with large planning applications now submitted.
- Leckhampton with Warden Hill Parish Council has put forward a Local Green Space application for the area (as part of their Neighbourhood Planning and is compliant with the NPPF), Cheltenham Borough Council has not given this application proper consideration.

BUILT
Recd 29 OCT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Having seen the development of Oakhurst and Farm Lane over the past 20 years and the corresponding growth in traffic, demand in schools, doctors etc, we believe that this latest application will have a detrimental effect on the area, causing further traffic jams and the general urbanisation of the area - no more country walks etc. without having to travel further afield. There is also a concern that the developer will reduce the amount of affordable housing if the economic climate is not right.

Name [redacted]

Ref. 13/01605/OUT

Address 128 CANTERBURY WALK
WARDEN HILL
CHELTENHAM GL51 3HF

BUILT ENVIRONMENT
Recd 29 OCT 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

No More Houses

Lets Keep The Green Fields Green!

Name [redacted]

Ref. 13/01605/OUT

Address Fillars Close

BUILT ENVIRONMENT
Recd 29 OCT 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

The A46 is already hugely over-congested. Further traffic would make this route untenable and a major hazard for children waiting for buses in the mornings.

The application should NOT be passed to host further growth plans in secondary school places.

Please record the OBJECTIONS of Richard & Sara Reader

Name [redacted]

Ref. 13/01605/OUT

Address 10 PAINSWICK RD, CHELTENHAM

P.S. We desperately need open spaces, easily accessed, for our sanity and well being.

BUILT
10 OCT 2013
RECEIVED

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I object very strongly to the above planning application and I believe the traffic would be unsustainable, at peak times it is already grid-locked and dangerous to shoppers in Bath Rd + locally generally. There are not enough secondary school places for children, even now.

The land in question is important for food production locally + recreation i.e walking etc on the footpaths & is a haven for wildlife & very peaceful for walkers. Air pollution is already a serious health problem.

Name [redacted] Ref. 13/01605/OUT

Address 14 Pyrford Rd, Cheltenham GL53 9AD

Please do NOT allow this development, I beg you.

83 Hecklampton Road
Cheltenham
GL66.
GL53 0BS

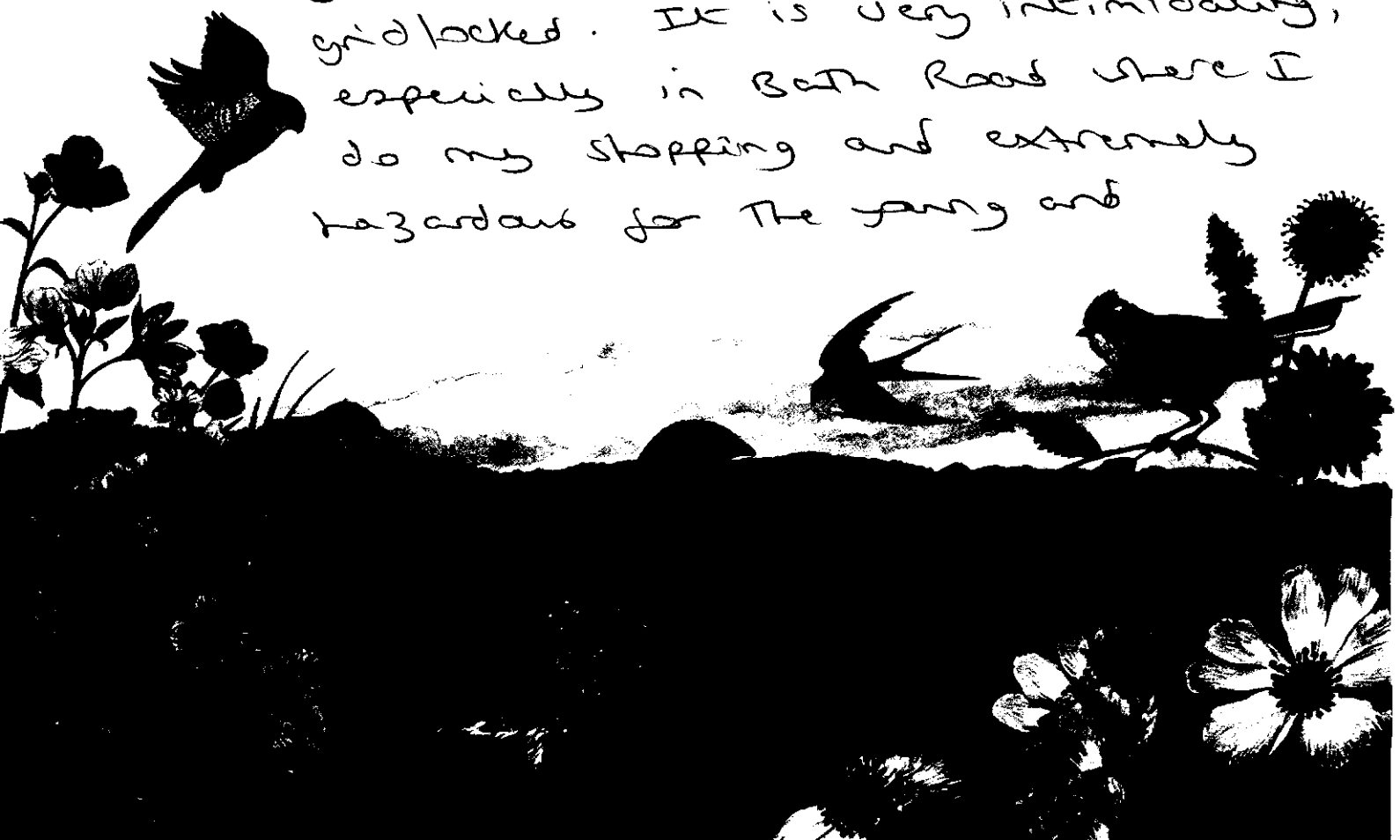
- 8 OCT 2013
ENVIRONMENT

Dear Planning Officers,

Ref. 13/01605/OUT - Hecklampton Green Fields

I wish to object in the strongest way to the above proposed development for the following reasons:

The traffic down Hecklampton Road and on The Shurdington Road is already very heavy and at peak times totally gridlocked. It is very intimidating, especially in Bath Road where I do my shopping and extremely hazardous for the young and



elderly. Impatient and aggressive motorists coming in and out of Cheltenham. This development would make the traffic situation unbearable.

Air pollution levels are already very high on the A46 and around Church Road in the winter months and is a threat to health.

Locally produced food has been grown on the allotments and small holdings for as long as I remember; it is very good agricultural land and should not be used for development. This area is also widely used for healthy, outdoor activity and is a haven for wildlife eg. bats, owls, dormice and many other creatures.

I implore you not to allow this massive development to go ahead.

Thank you.

Yours sincerely,

[redacted]

[redacted]

BOROUGH
Received 30 OCT 2013
ENVIRONMENT

14 PILFORD ROAD
LECKHAMPTON
CHELTENHAM
GL53 9AHQ

24.10.13

Dear Sirs,

APPLICATION NO. 13/01605/OUT

I wish to object most strongly to the above planning application.

For the whole of my adult life a presumption has existed that the Green Belt should not be built upon - for one reason amongst others to prevent "urban sprawl". Has this principle now been abandoned? Later on the status of A.O.N.B. was created in order to protect areas of outstanding natural beauty being ruined by development of the type proposed by the above planning application.

Specific problems which will arise from the proposed development are that.

(i) An additional estimated 1000 extra vehicles will all exit onto the Shurdington Road.

(ii) Apparently another developer has already described this road network as 'broken' and 'is over capacity'. The argument being that since the network is already broken it cannot be made worse. This concept is completely illogical.

(iii) Air pollution levels already break EU levels in the winter months on Church Road and the A46. Clearly an extra 1000 vehicles is not going to help.

The above reasons are why I oppose the planning application.

Yours faithfully, David Catlow

21 St. David's Road,
Warden Hill,
Cheltenham, Glos.
GL51 3HL

2 : OCT 2013

23rd October, 2013

CBC Planning,
Municipal Offices,
Cheltenham,
GL50 9SA

Dear Sirs,

Outline Planning Application Ref: 13/01605/OUT
Kidnappers Lane and Small Holdings.

This planning application is premature, and must not go before the Planning Committee until the Joint Core Strategy for the whole area has been finalised and agreed by the Inspectorate.

I believe that the population estimates for the JCS area have been miscalculated and the figures for the increase in persons living in the area over the 20 year period, are exaggerated and need to be checked with the Office of National Statistics, before deciding where houses and other amenities will be needed.

It is a gross folly to plan for the exit of cars from 650 houses plus other amenities all into the Shurdington Road. The road is already overloaded and the whole system broken.

Air pollution levels in the area already break EU levels in the Winter months.

Brown field sites should be used ahead of open green spaces.

Living in the Warden Hill area, I believe the building of so many houses, above the level of Warden Hill, places the area in danger of further flash flooding as was experienced in 2007. Yes, I know a barrier was built, but concrete over vast areas above the protection zone and the water will be released to the barrier, and cause flooding and even perhaps the washing away of the Shurdington Road.

Additionally, this application may provide a primary school, but what about the crisis already in existence for secondary school places?. There is a horrendous outcry from parents as children are being brought in from places as far away as Wales to take places at Pates Grammar School, meaning that children born and brought up here are squeezed out. Until sufficient provision is provided, which will take years, building further houses here is unwise. Children grow up and immediately a new site is built there will already be children of secondary school age needing a school.

Full consideration should be given to the Local Green Space application, proposed by the Leckhampton with Warden Hill Parish Council, which would allow this area to be used for recreational and other pursuits, as has been the case for many, many years.

Yours faithfully,

[redacted]

CBC
29 OCT 2013
Date of response
Type of
Date of
File

21 St. David's Close,
Warden Hill,
Cheltenham, Gl51 3HL

23rd October, 2013.

CBC Planning,
Municipal Offices,
Cheltenham,
GL50 9SA

Dear Sirs,

Outline Planning Application Ref: 13/01605/OUT
Kidnappers Lane and Small Holdings

1. This application is premature, and should not go before the Planning Committee until the Joint Core Strategy for the area of Cheltenham, Tewkesbury and Gloucester has been finalised and accepted by the Inspector.

2. All aspects of planning, transport, environment and the population estimates contained in the housing targets of the JCS must be verified before consideration of this application by the Planning Committee.

3. Various aspects of this planning application, are completely unacceptable:

i) 650 houses alone, exiting onto the Shurdington Road will cause another 1,000 or so vehicles entering a road system that has already been described by another developer, as broken. Add to this the extra chaos which will be caused by all the traffic entering the area for the GP surgery, school, care home etc. Only a madman would even suggest it. This is why it would be totally irresponsible to consider this application prior to the traffic/transport modelling results being available.

ii) Air pollution levels already break EU levels in the Winter months on Church Road, and the A46. The whole of Cheltenham has been made an Air Quality Management Area in response to the problem.

iii) The open countryside of this area has immense value to wildlife, biodiversity and the people of Cheltenham demonstrate this as it is a favourite walking and recreation area for many of the Cheltenham people and many tourists to this area, will be found walking here, with a map hanging from chains around their necks.

For this reason, Leckhampton with Warden Hill Parish Council, has placed before the local Councils, a request for consideration of a Local

Green Space area, all in compliance with the NPPF, for much of the area that the Developers now wish to build over. Full details of this proposal should be favourably considered, before agreeing to this Application.

iv) It is understood that if this Application were approved, the primary school would not be built until the second phase of the development was complete. In the meantime, where would the children go to school?. I understand there are few if any, vacancies elsewhere. Also there are insufficient senior school places.

v) Warden Hill will again be at risk by the building of so many houses from flooding, when there are freak storms. The flood barriers will not withstand the extra pressure from land being concreted over in the Leckhampton area. Water will find its way down to Warden Hill, and a repeat of the 2007 disaster will occur, when many homes had to be evacuated, some for months at a time.

These are just a few of my objections to an ill considered planning application.

I reiterate, this application should be turned down as being premature, until the Joint Core Strategy has been thoroughly checked for accuracy and finalised and approval has been given by the Inspectorate.

Yours faithfully

[redacted]

The Cottage on the Green
The Green,
Badgeworth,
Cheltenham
GL51 4UL

26th October, 2013

Dear Sirs,

Re Planning Application 13/01605/OUT

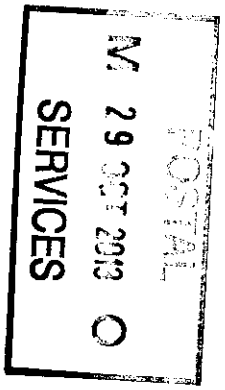
I am writing to object to the above planning application.

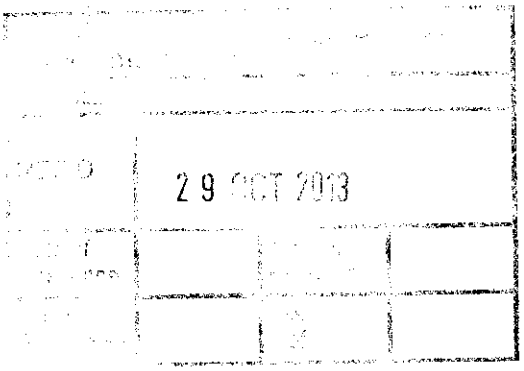
Is the continued sprawl of Cheltenham necessary when population numbers have levelled?

This development will make more traffic congestion on Shurdington Road, possibly leading to the construction of a Shurdington Bypass, cutting a swathe through acres of the green belt and precious farmland in Badgeworth, causing light, air and noise pollution and loss of wildlife habitat.

Yours Faithfully

[redacted]





Mr Craig Hemphill
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
GL50 9SA

Hamptons International
105 Promenade
Cheltenham
Gloucestershire
GL50 1NW

Tel: 01242 517469
Fax: 01242 222852
Email: jonesg@hamptons-int.com
www.hamptons.co.uk

Ref: GJ/CM
25 October 2013

Dear Mr Hemphill

Re: 13/01605/OUT - Land at Leckhampton, Shurdington Road, Cheltenham, Gloucestershire

On behalf of two Clients who have land interests on both Kidnappers Lane and Church Road including business use, I write in respect of the above referenced planning application. My Clients control land to the west of Kidnappers Lane and my other Clients control land to the north of Church Road. My Clients land is under promotion through the relevant consultation stages of the Joint Core Strategy (JCS) for inclusion within the Leckhampton strategic allocation for reasons that will become apparent below.

From the outset it is important to confirm, this letter is not an objection to the principle of development in this location, particularly given its planning history. This part of Cheltenham Borough is not Green Belt land, nor is it part of the Cotswold Area of Outstanding Natural Beauty. Along with surrounding land, it has no formal designation in the current adopted Local Plan and in that context can be described as 'white land'. Furthermore, it has now been identified as a growth location within the emerging Joint Core Strategy which has been recently published as a draft for consultation.

Separate representations will be made to JCS in connection with this application site as well as my Clients land. Our representations will demonstrate that there is a clear evidence base for development growth in this area of Cheltenham Borough and this location is a sustainable location to accommodate growth in the JCS having regard to footnote 9 (NPPF, Paragraph 14). However, it will be highlighted that the there is no precise or accurate evidence base to limit the Leckhampton strategic allocation boundary to the extent illustrated within the JCS Draft for Consultation (Plan 6). More specifically, it will be demonstrated that the exclusion of the land to the west of Kidnappers Lane and land to the north of Church Road is illogical and detrimental to the delivery of a properly planned and sustainable urban extension in this location.

The overarching issue which this representation raises is whether the format of development as proposed by Miller Homes and Bovis Homes is indeed sustainable development, and as such whether it should be granted planning permission in its current form, having regard to Paragraph 14 of the National Planning Policy Guidance Framework (NPPF) and the presumption in favour of sustainable development. In its current form, the application proposal is not sustainable in relation to NPPF and should not be granted planning permission and this letter goes on to explain why. That said, modifications could be made by the applicants to overcome this.

To understand why this letter focuses upon the NPPF rather than the adopted Gloucestershire Structure Plan or Cheltenham Borough Local Plan, reference should be made to paragraph 215 of the NPPF and the limited level of weight that can now be attached to these documents and their policies. Paragraph 215 of NPPF explains that weight that policies in Structure Plans and Local Plans can be given is directly related to their consistency with the NPPF and for that reason this letter is framed around that document.

The application proposal is a residential-led scheme comprises 650 dwellings and ancillary mixed used development including retail, pharmacy, GP surgery and 4,500 sqm of undesignated floorspace which could be utilised for a number of uses including additional class A1 retail, class B1 offices, class C2 care home and/or class D1 uses, along with a network of access routes, landscaping and strategic open space. The application is submitted in outline with access to be determined and all other matters reserved.

The application is accompanied by an illustrative masterplan (drawing no. 500-001-C), a residential density parameter plan (drawing no. 500-006), and various technical documents including Environmental Statement, a flood risk assessment (FRA) and a transport assessment (TA).

It is noted the site-specific FRA only makes passing reference to the Level 2 Strategic Flood Risk Assessment especially commissioned by the local authorities to support the Joint Core Strategy investigations. There is a significant difference of opinion between the conclusions of the Level 2 SFRA and the site-specific FRA. The site-specific FRA states at page 8 that the flood mapping prepared by JBA Consulting on behalf of the applicant is superior to the Level 2 SFRA. Even so, the applicant recognizes that some development will be in Flood Zone 2. On the face of it the proposed development includes land which is in Flood Zones 2 and 3 which is inappropriate for residential development.

With regard to the SFRA Flood Zone 2 and having undertaken approximate calculations in respect of the individual land parcels indicated on the density parameters plan (drawing no. 500-006), it is estimated that 96 dwellings of the proposed 650 will be located within Flood Zone 2.

The illustrative masterplan when read in conjunction with the Level 2 SFRA highlights there are alternative areas of land that are not within Flood Zones 2 and 3 that could be developed. These areas should be identified in the sequential test required by application of the NPPF and the technical guidance. As such, the application proposal is currently contrary to the NPPF in respect sustainable development, when there is alternative and lower flood risk land available that should be included (the land to the west of Kidnappers Lane and land to the west of Church Road).

In assessing whether the application proposal is sustainable development, regard should be also had to the appropriateness of the proposed density of development relevant to the site context. With reference to the submitted masterplan and density parameter plan, it is estimated that the areas of high density development (41-55 dph) will cover approximately 4.14 hectares of the application site, and between 170 -227 dwellings based on the higher density range indicated. This proportion of high density development is considered wholly inappropriate to the local context and unsustainable with regard to NPPF, paragraph 58. There is a need to significantly reduce the proportion of higher density

development to deliver a scheme which is more appropriate to the site context, including the local built form and urban edge location. The application proposal is overly ambitious in respect of the number of dwellings proposed within the application site and the density of development proposed. This further emphasises the need for additional land to be identified to accommodate the proposed development in a sustainable development.

A further consideration concerning the illustrative masterplan, and also shown on the Access and Movement Parameter Plan (drawing no. 500-003 Rev A), is the depiction of the highway proposals. It is noted the transport assessment recognizes that land west of Farm Lane, already allocated in the extant Tewkesbury Borough Local Plan, will come forward, however there is no attempt to show on the illustrative masterplan positive connectivity with other development. It is considered that land between Kidnappers Lane, Church Road and Farm Lane should be included in the development proposals so that comprehensive links can be formed. This is important if it is intended as shown to close-up sections of Kidnappers Lane and Farm Lane. Indeed my Clients operate businesses that require unfettered access to Kidnappers Lane, Church Road and Farm Lane and I therefore strongly object to the potential road closures restricting these enterprises; my Clients would however consider amendments to the road network if it is part of a comprehensive proposal for the wider area.

For these reasons land to the west of Kidnappers Lane and land to the north of Church Road should be allocated and recognised with the application masterplan.

Whilst the need for a comprehensive masterplanning approach is recognised, the illustrative masterplan includes a significant area outside the applicants' control and without confirmation that the land will be made available for development; it is unreasonable to use this plan as a basis for the grant of planning permission if in doing so it affects other landowners' interests.

Yours sincerely,

[redacted]

Associate Director

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

THIS IS A GREEN BELT AREA THAT IS ENJOYED BY MANY PEOPLE BUILDING HUNDREDS OF HOUSES ON IT WILL BE A HUGE LOSS. THERE ARE CERTAIN PARTS OF CHELTENHAM SUITED TO MASSIVE HOUSING DEVELOPMENTS, LECKHAMPTON (KIDNAPPERS LANE) AND SHURDINGTON (CHARGROVE LANE) ARE NOT. THEY PROVIDE A CLEAR DIVIDE FROM SURROUNDING AREAS GIVING CHELTENHAM ITS CHARACTER.

Rec'd 31 OCT 2013
Ref. 13/01605/OUT

Name [redacted]

Address 25 TAMARISK CLOSE, UP HATHERLEY, CHELTENHAM GL51 3WL

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Arterial routes for people to get to work, town and schools and other services are totally inadequate. The current infrastructure is stretched to its limit. There is already virtual gridlock on Shurdington Rd. during the rush hour.

Rec'd 9 OCT 2013

Name [redacted] Ref. 13/01605/OUT

Address Sandy Lane Rd Charlton Kings.

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Before thumbing for the easy green field development every effort should be made to use each + every brown-field site. As already commented before the danger of flooding is a reality. The increase in traffic on Shurdington Road / Bath Road is causing tail backs back to the roundabout on the A46. Needless to say there is an attendant pollution problem. Both of these issues can only get much worse.

Rec'd 30 OCT 2013

Name [redacted]

Ref. 13/01605/OUT

Address 11 HIGHWOOD AVE GL53 0JT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I endorse the 5 objections listed.
And also the overall view that the application is premature and that the SCS should be finalised and all relevant aspects should be developed.

Rec'd 30 OCT 2013
ENVIRON
Ref 13/01605/OUT

[redacted]
17 MERLIN WAY
GL53 0LT

BUILT ENVIRONMENT
Recd 30 OCT 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

The planning application should be rejected
The road network is already severly under
pressure & would be wholly inadequate
should the proposed development proceed.
The levels of pollution would be quite
unacceptable. Likewise other inconvenience
would be inadequate & one weighted.
It is probable that any politicians who support
this application will be punished in future
elections

Name [redacted] Ref. 13/01605/OUT

Address 192 Leckhampton Rd
Cheltenham GL53 0AE

DCLT
Recd 30 OCT 2013
ENV

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Building on this land has already been framed to be a flawed development. Please refer to all other proposals and the reasons planning was denied. However, let's go round the loop again.... Transport, Environment & Population estimates have not been verified. This application is very premature. Please DO NOT build on an OPEN SPACE enjoyed by thousands. People with easy access to OPEN SPACES are happier and healthier both physically & mentally

DAILY TELEGRAPH 24/10/13 Pg 9

Name [redacted] Ref. 13/01605/OUT

Address 34 MERLIN WAY
LECKHAMPTON

CHELTENHAM NEEDS THIS OPEN SPACE

Rec'd 30 OCT 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

This threatens our green belt and extends the boundary of Cheltenham - once built on these green fields can never be regained. The infrastructure around South Cheltenham - Leckhampton & Shurdington especially - is already at breaking point. PLEASE turn down this application. We cannot cope with the additional estimated 1000 vehicles - the road is gridlocked without them. Pollution levels are already exceeded in Winter months & Cheltenham already suffers high asthma rates. There is no nearby motorway link to the M4, so all these cars will have to travel via Birdlip for London/Swindon - this is already an accident not spot. The road network cannot cope already and without demolishing houses in Church Road cannot be alleviated. Please do not allow these houses to be built & further risk our children's lives with even busier roads.

Name [redacted]

Address Suffolk House
166 Leckhampton Road
Cheltenham GL53 0AA

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

CART BEFORE THE HORSE! FINALISE JCS FIRST

THE A46 INTO CHELTENHAM IS ALREADY A DISINCENTIVE TO TRAVEL INTO CHELTENHAM - 650 HOUSES (1300 CARS) CAN ONLY MAKE IT WORSE - DO THE TRAFFIC MODELLING BEFORE FALLING FOR THE DEVELOPERS SALES PITCH

GREAT WAY TO DESTROY THE UNIQUE ESSENCE OF CHELTENHAM

Name [redacted]

Address 43 HAINSWICK RD

CHELTENHAM

Ref. 13/01605/OUT

Recd 30 OCT 2013

ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

PLEASE SIT IN YOUR CAR AT 8:30AM and join the queue travelling to Cheltenham

1) We should do all in our power to resist URBAN SPRAWL and destroy our glorious countryside.

2) Narrow Lanes are totally unsuitable for heavy traffic caused by an extra 650 HOUSES

3) Where will these new occupants find school places? Doctors?

4) Shurdington Road can not cope with any more traffic.

Name [redacted]

Address 11 THE LANES GL53 0PU

Recd [illegible] Ref. 13/01605/OUT

Ref: Planning Application 13/01605/OUT

Name [redacted]

Address 1 LIDDINGTON CLOSE GL53 0AH

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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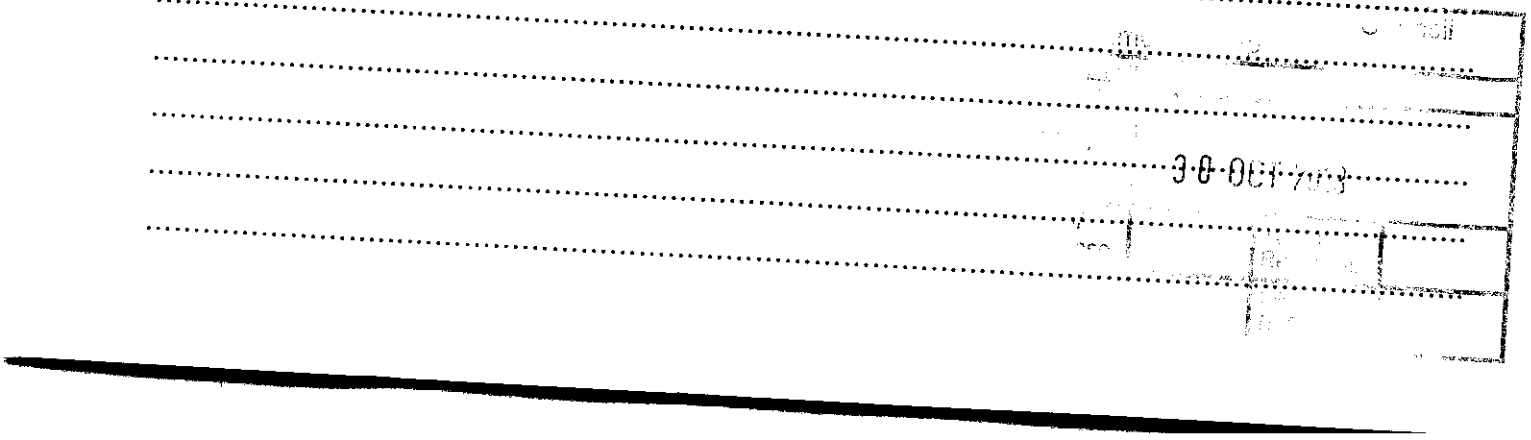

Name ... [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ..... 15 HALL ROAD, LECKHAMPTON, CHELTENHAM, GLOS, GL53 0HF .....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Page 657

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ✓ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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30 OCT 2013

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 15 HALL ROAD, LECKHAMPTON, CHELTENHAM, GL53 0HE

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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30 OCT 2013

Nam[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 12 Gordon Road, Leckhampton, Cheltenham GL53 0ES.

(include, delete or modify the following statements as appropriate)

BUILT
Rcvd - 1 NOV 2013
ENVIRON

I wish to object to the proposed development on the following grounds:

(a) ✓ Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) ✓ The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) ✓ The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) ~~I am personally affected~~ We are / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~I~~ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: f) Have all Brownfield Sites been fully investigated?

Nam[redacted] **Planning Application 13/01605/OUT**

Address 89 CHURCH RD, LECKHAMPTON CHELTENHAM GL53 0PF

(include, delete or modify the following statements as appropriate)

BUILT ENVIRONMENT
Recd - 1 NOV 2013

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) ~~I am~~ We are personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development. It is alarming to know pollution levels are already above EU limits in Wales in Church Rd

(e) ~~I~~ My family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: The lorries going to the meat packing unit are banded from using Church Rd due to a weight restriction will the planned changes in Leckhampton Lane mean they will return to using Church Rd?

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 243A Old Bath Road, Cheltenham GL53 9EF

(include, delete or modify the following statements as appropriate)

BUILT
Rec'd 1 NOV 2013
ENVIRONMENT

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ..... 3 PILFORD CLOSE, CHELTENHAM, GL53 9HA .....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

BUILT
- 1 NOV 20
ENVIRONM

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: There are NOT enough primary school places for the expected 2014/2015 intake. Where are an extra 300 homes worth of children going to go?

Where are children of secondary school age going to go?

Name [redacted]

Address 89 MOOREND RD, LECKHAMPTON, CHELTENHAM, GL53 0HB

Ref: Planning Application 13/01605/OUT

(include, delete or modify the following statements as appropriate)

I wish to STRONGLY **object to the proposed development on the following grounds:–**

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

PASSED TO			
RECD	31 OCT 2013		
Date of Response		Type of Response	
Initials of Response		File Ref	

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments:

Further reference to item (c) above:—

The village already suffers from 'rat run' traffic using residential roads — these developments would render the situation unbearable.

[redacted]

Page 1070

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 89 MOOREND RD, LECKHAMPTON, CHELTENHAM, GL530HB

(include, delete or modify the following statements as appropriate)

I wish to STRONGLY **object to the proposed development on the following grounds:**

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work ~~they will cause big traffic~~ increases elsewhere, such as in Moorend Park Road.

DULT
Recd 31 OCT 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments:

Further to item (c) above:—

The Village already suffers from [redacted] 'RAT RUN' traffic using residential roads — the proposed developments would render this situation unbearable.

[redacted]

BUILT
Recd - 1 NOV 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

The area is already very congested with traffic to & from the M5 junction 11A. The Shurdington Rd - & Bath Road are almost gridlocked at busy times - We are losing all our green spaces - Up Hatherley is over developed now - we have no more Doctors Surgeries or Schools - This whole area is being spoilt.

Name [redacted]

Address Maplehurst, Sandyhave Rd - Cheltenham

Ref. 13/01605/OUT

BUILT
Rec'd - 1 NOV 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE . 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

My main objection to this development is the lack of infrastructure in terms of transport that this estate will burden the area with even more than the existing population does. I also am worried about local unemployment rates increasing due to the lack of opportunities opening up within the development - certainly not enough to fulfill all 650 houses with employment.

I therefore wish that you would reconsider this development and find it to be an unacceptable development and an incredibly bad idea.

Name [redacted]

Ref. 13/01605/OUT

Address FLAT 1, THE FIRS, OLD STATION DRIVE, CHELTENHAM

Rec'd - 1 NOV 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

We are strongly opposed to this development. As parents with children in the area we are very concerned about the pressure this will place upon schools and the local environment. It is ludicrous to think that Kidnappers Road which is already a very busy road and Church Road, could support the extra volume of traffic that would be generated. This is a very ill thought out plan and lacks logic and a balanced and reasoned understanding of the dynamics of the area.

Name [redacted]

Ref. 13/01605/OUT

Address 2 Hatsby Close Cheltenham

22 Campion Park

Up Hatherley

Cheltenham

GL51 3WA

BUILT
Recd - 1 NOV 2013
ENVIRONMENT

26 October 2013

Dear Sirs

Re: Proposed development 800 houses Up hatherley/Chargrove

I hereby give you notice that I wish to strongly object to the above proposed development for the following reasons:

1. Up Hatherley Lane, Shurdington Road and the B&Q roundabout are already subject to queues at peak times and will become gridlocked if this development takes place. There are likely to be more accidents.
2. There are only 2 local supermarkets, namely Morrisons and Asda, and their car parks are nearly full most of the time. It will not be possible for everyone to park at these supermarkets if the development goes ahead.
3. The local schools are already full. How will children be able to get educated at local schools?
4. Doctor and dentist surgeries are already very busy. How long will residents have to wait for an appointment? A long time, thereby causing risks to health.
5. It is inconsistent and madness to downgrade Cheltenham Hospital and possibly move Cheltenham Police Station to Bishops Cleeve and then build hundreds more houses in Cheltenham.
6. When Up Hatherley Way was constructed, the Council agreed it was a permanent boundary for the greenbelt. The Council should stick to this agreement.
7. The 2011 Assessment of the greenbelt decided that the Chargrove area of the greenbelt was vital. Why is this being ignored?
8. The proposed growth in population figures have not been verified and many believe them to be inaccurate so that the number of houses proposed is unnecessary.

9. The construction of 800 homes will reduce the greenbelt between Hatherley and Shurdington by 50% which is unacceptable.
10. There will be less country footpaths for local residents to use and destruction of wildlife and their habitat.

Yours faithfully

[redacted]

[redacted]

To: Public Consultation, Joint Core Strategy Team, Municipal Offices, Promenade, Cheltenham. Glos. GL50 9SA>

BUILT
Recd 01 NOV 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

1) ROADS CANNOT COPE WITH INCREASED TRAFFIC * MADNESS TO THINK OTHERWISE *
WRONG PLACE TO BUILD ON

2) MAYHEM FOR SCHOOL PLACEMENTS
ESPECIALLY SENIOR SCHOOLS

3) OVER CAPACITY

4) YOU MUST LISTEN, FAILURE WILL BE DETRIMENTAL TO ALL PARTIES

Name [redacted]

Address 30 BRIZEN LANE LECKHAMPTON

Ref. 13/01605/OUT

BUILT
Recd 21 OCT 2013
ENVIRONMENT

The Littlecroft
Shurdington Road
Leckhampton
Cheltenham
GL53 ONJ

28th October 2013

CBC Planning,
Municipal Offices,
Cheltenham,
GL50 9SA

Your ref: 13/01615/OUT

Dear Mr Sirs,

Re: Outline Planning Application Number 13/01615/OUT

I am writing to object to the above planning application to build on Kidnappers Lane and the small holdings in Cheltenham.

I believe the proposal is fundamentally wrong and should be refused for the following reasons:

This application is premature, and should not go before the Planning Committee until the Joint Core Strategy for the area of Cheltenham, Tewkesbury and Gloucester has been finalised.
Also all aspects of planning, transport, environment and the population estimates contained in the housing targets have been verified."

The development falls within the green belt and our local plan is supposed to protect this. Until a new local plan is in place the development should be refused.
We should be keeping our countryside/greenbelt, for the benefit of future generations.
Developers should be asked to re-develop all brown field sites BEFORE taking any green spaces.

The land being considered for development around Leckhampton is very valuable asset to Cheltenham.
People come from many other areas of Cheltenham to walk the paths that criss-cross the fields. More and more people are to be found out with their animals and families at the week-ends particularly walking and enjoying the fresh air - and the chance to relax away from the stress of everyday living, which in turn, keeps people fit and happy.

The site is marked in **RED** in the recent JCS Greenbelt review i:e no development should take place.

Why let our countryside/greenbelt be developed when housing needs can change so easily.
Look how everything is changing - our high streets for instance - It could be that in a very small number of years, housing will replace many of the empty shops, more and retailers are turning to the internet for sales and abandoning the high street.

Consideration should be given to the jobs and income derived from the tourism industry that brings people to Cheltenham, it is not just the shopping and regency areas which bring people to

our town, it is the closeness of the countryside and the beauty of the landscape. If we allow the developers the opportunity they will ALWAYS take the most profitable land, i.e. greenbelt land in prime locations.
The JCS takes no account of the last four previous inspectors recommendations that large scale development in the Leckhampton area be rejected and that the rural character should be protected.

They also stated that the Shurdington road is already heavily congested and the air quality figures break EU air pollutant limits. The Shurdington road is already log jammed, most mornings I can't turn right out of my drive and have to do a 'U turn' at Morrison's round about.
Cheltenham is supposed to be an Air Quality Management Zone and this development will have a seriously detrimental effect on those people living along the boundary of the Shurdington road.

The Halcrow JCS Strategic Flood Risk Assessment, July 2011 identifies that Hatherley and Hambrook in Leckhampton are at high risk of flooding. Area's that have historical records showing incidents of flooding should be treated as flood zone 3A; at risk and not suitable for development.
Over 40 houses were flooded in 2007 in Warden hill, the Shurdington road floods regularly from the surface water runoff from Leckhampton hill and although there was some minimal flood defence work put in place this does not take into account the loss of protection that these open fields offer from flood risk.

We know from recent experience that the local schools are already oversubscribed and there are few local employment opportunities which will mean more car journeys along an already congested and polluted road.

Once the countryside is built on it is gone FOREVER, no one is denying that we need more housing but we have an responsibility to ensure that they are built in suitable locations, i.e. begin with brown field sites so as to enable us to retain as much of our unique landscape as possible.

I look forward to receiving your response.



BUILT
Recd 31 OCT 2013
ENVIRONMENT

entran
environmental & transportation

Our Ref: T7087/LK/RGW/02

Your Ref:

Date: 22nd October 2013

Entran Ltd
12 Greenway Farm
Bath Road
Wick
Bristol
BS30 5RL

[redacted]

Dear Sirs

Planning Application; 13/01605/OUT, Land At Leckhampton, Shurdington Road, Cheltenham, Gloucestershire

I have reviewed the TA that accompanied the above referenced application, and would like to make a formal objection to this application based on the following observations.

JCS Accessibility Analysis

The TA correctly reports that the JCS clearly identified Leckhampton as having the lowest category of accessibility in the Cheltenham area, yet the TA seeks to suggest otherwise and identifies a few reasons why. It is fundamental to this process that such an assessment is updated before any irreversible decisions are made.

Junction Analysis

Throughout the report, it is acknowledged that additional analysis information will be made available once completed. No decision on the acceptability of the proposals can be made until such information has been presented.

The analysis presented in the TA reports that the following junctions will be operating beyond their operational capacity.

1. A46 Shurdington Road/Leckhampton Lane Priority Junction
2. A46 Shurdington Road/Woodland Road Priority Junction
3. A46 Shurdington Road/Moorend Park Road Signalised Junction

In summary, rather than focusing on any individual junction, what the analysis shows is that these junctions will, in 2023, be operating either in excess of their theoretical operational capacity or significantly in excess of their theoretical capacity in both the base and development scenarios.

Disappointingly, it has not been reported how these junctions currently operate so no comparison can be made with what is witnessed now. This analysis should have been presented. Nevertheless, in simple terms, what this analysis clearly demonstrates is that the local highway network is, by 2023, significantly broken.

Furthermore, such significant capacity issues arise by 2023 that any further development beyond the operational capacity of the network should be restricted, but with no 2013 model or any interim models, at what point in time this might be, or how development numbers might be scaled back is not known.

Such information must be made available if a reasoned and quantified decision on the acceptability of the proposals presented in this TA and other proposals for the Leckhampton area is to be made. It is not acceptable just to say that the network is broken without knowing when.

One would have normally expected the TA to address the development's own impact, even if a junction is operating over capacity. Good practice would be to seek to bring the impact of the development back to the before development condition i.e.; nil detriment. No mitigation measures are proposed.

In addition to the above, all the analysis presented assumes that the SD2 and Brockworth developments go ahead. As an absolute minimum, a sensitivity test should have been undertaken assuming only background growth to 2023. The real impact of the development on the local highway network could then have been identified and mitigation proposed.

The reported traffic delays and queuing levels at these junctions should be further considered in terms of noise and air pollution and their impacts quantified.

Link Analysis

Throughout the report, mention is made of traffic conditions along the A46 quoting a 23% increase in traffic up to 2023. This is then highlighted via the presented junction analysis indicating that a number of junctions will be operating beyond their theoretical capacity. Given the significant level of impact the various developments have on the A46 corridor up to 2023, a full link analysis should have been undertaken.

Such an analysis would have assisted in understanding the volume of traffic expected to travel along the A46 during peak periods, what residual traffic might still be on the highway network outside the peak periods, how this might impact on the ability of buses to viably use this corridor, the impact on pedestrians, cyclists as well as noise and air quality.

Such information must be made available if a reasoned and quantified decision on the acceptability of the proposals presented in this TA and other proposals for the Leckhampton area is to be made.

Vehicle Re-routing

The TA reports on the use of a Saturn model to inform the TA process. However, it is well known that once links and junctions are at capacity such a model will seek to redistribute traffic to create a more balanced network.

No reporting on any vehicle re-routing is included in the TA and so concerns are raised as to whether vehicles have been modelled as re-routing through residential estates. Clarification on this point is sought.

Highway Safety

Whilst highway safety has been considered in relation to the impact of the development over-and-above the baseline, no consideration has been given to the increase in traffic from 2013 to 2023.

Once again this is a vital piece of missing information. Such an analysis should be addressed during these years as it cannot be the case that such an increase in traffic will not lead to an increase in accidents.
Of course this is also a part of the bigger picture for development in this area, but without this information no sensible and qualified decision on the acceptability of either of these proposals or the overall quantum of development proposed for the area can be made.

Contrary to what the TA reports, Leglag commissioned a separate accident analysis which is appended to this letter. This report concludes that the present levels of traffic in Leckhampton, and particularly along the A46 Shurdington Road, lead to a significant number of injury accidents every year, as well as a fatality.

Once again this appears to suggest that the network is already at capacity and any increase in traffic along this network may have a significant effect on highway safety.

Pedestrians

It is disappointing that a full walking audit to essential facilities has not been undertaken, particularly given the forecast increase in pedestrian movement resultant of the development proposals (4.7.8). As a very minimum, routes to schools should have been assessed against criteria such as footway width, condition, existing usage and the ability of the footpaths to cater for additional peak hour demand. Local observations indicate that they cannot and additional pedestrian traffic could result in more pedestrians being forced to walk in the road, or not being able to be accommodated at existing crossing locations.

Without a full pedestrian route capacity analysis a reasoned and quantified decision on the acceptability of the proposals presented in this TA and other proposals for the Leckhampton area cannot be made.

Public Transport

The A46 is identified as a public transport corridor and one that might benefit from a park-and-ride facility. Mention has been made of this in the TA, but states that the Council's study in to the effectiveness of such a facility has not been completed. In addition the report suggests that the results of this study may require the submitted analysis to be reviewed.

Without completion of this report and additional analysis (if required), the viability and therefore the deliverability of such a scheme must be questioned.

Impact on the Strategic Road Network

The submitted TA fails to deal with the impact on the strategic road network, only referencing on-going discussions (sections 1.2.3 and 6.6), this is a major deficiency in the report and makes the conclusions somewhat misleading.

Within this section of the TA, reference should have been made to DfT Circular 02/2013 'THE STRATEGIC ROAD NETWORK AND THE DELIVERY OF SUSTAINABLE DEVELOPMENT' Key references in this document include;

Development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the strategic road network, or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

However, even where proposals would not result in capacity issues, the Highways Agency's prime consideration will be the continued safe operation of its network.

The overall forecast demand should be compared to the ability of the existing network to accommodate traffic over a period up to ten years after the date of registration of a planning application or the end of the relevant Local Plan whichever is the greater. This is known as the review period.

The preparation and implementation of a robust travel plan that promotes use of sustainable transport modes such as walking, cycling and public transport is an effective means of managing the impact of development on the road network, and reducing the need for major transport infrastructure.

None of the above has been addressed in the TA, which is a major omission. Until these issues have been satisfactorily addressed and reported accordingly (Section 1.2.3 advises that addendums will be produced), a decision on the acceptability of the proposals cannot be made.

Missing Information/Addendums being prepared

i. Measures for Leckhampton Lane
ii. Paramics modelling and resultant discussions with the HA
iii. Additional application area forecasting and modelling using 2011 census data
iv. Report on Park-and Ride
v. JCS traffic modelling

Required Information to enable a Qualitative Decision on the Development Proposals to be made

a. Missing information identified above
b. Junction mitigation proposals
c. Link analysis
d. Accident analysis

e. Pedestrian capacity analysis
f. Junction sensitivity testing
g. Updated accessibility assessment
h. Public transport viability assessment

Recent road accidents in the Leckhampton area involving injuries and fatalities; Report for Leglag, 18th January 2013, by C.M. Bell

This report is based on detailed accident reports provided by the Gloucestershire County Council Accident Investigation and Prevention Section to Gerry Potter on 13/12/2012. The data on injury accidents covers the 10 year period between 1/01/2002 and 31/12/2011. Information on fatalities covers the 20 year period 01/01/1991 till 31/12/2012.

The area considered for injury accidents is bounded by:

- The A46 Shurdington Road-Bath Road between Shurdington and Thirlestaine Road
- Leckhampton Lane-Church Road
- Leckhampton Road

Summary

There were 123 reported injury accidents in the area under consideration in the 10 years between 2002 and 2011. Approximately 70% of the accidents occurred along the A46.

Number of accidents reported 2002-2011:

Year	Number of accidents	Casualties
2002	21	24 slight
2003	17	23 slight
2004	15	19 slight, 1 serious
2005	10	12 slight, 1 serious
2006	13	14 slight
2007	12	18 slight
2008	9	9 slight, 1 fatal
2009	8	6 slight, 2 serious
2010	9	7 slight, 1 fatal
2011	9	6 slight, 3 serious

7 accidents involved serious injury and two involved fatalities. 21 of the 147 casualties were pedestrians, 15 were cyclists and 15 were motorcyclists. The report does not state whether the decrease in the number of accidents and casualties was due to differences in the methodology of reporting or to an actual decrease in the numbers.

There were 59 injury accidents on the A46 between Shurdington and the Norwood roundabout and 28 on the Bath Road between the Norwood Arms roundabout and Thirlestaine Road.

Blackspots on the A46 were:

- Shurdington Road-Leckhampton Lane junction (Bell pub), 14 accidents
- Morrison's roundabout, 4 accidents
- Woodlands Road turnoff, 5 accidents
- Moorend Road traffic lights, 12 accidents (note this junction has been upgraded)
- Norwood Arms roundabout, 9 accidents (note this junction has been upgraded)
- Bath Road (Norwood Arms to Thirlestaine Road), 28 accidents

Blackspots on the Leckhampton Lane-Church Road were:

- Shurdington Road-Leckhampton Lane junction (Bell pub), 14 accidents
- Farm Lane-Crippetts Lane, 6 accidents
- Leckhampton Road-Charlton Lane intersection (double mini-rounabout), 5 accidents

Fatalities

There were 9 fatalities in the area under consideration and in the immediately surrounding roads in the 20 years between 1991 and 2012. This is approximately one every two years.

08/01/1991	Pedestrian in Bath Road
15/03/1997	Driver and passenger, junction of Farm Lane and Leckhampton Lane
14/11/1997	Driver on A46 near Hatherley Cricket Club
28/10/1999	Cyclist between A46 roundabout and Morrison's Supermarket
23/10/2007	Driver Naunton Lane
04/11/2008	Pedestrian A46 near Hatherley Cricket Club
01/02/2010	Cyclist Leckhampton Road
04/12/2012	Cyclist/pedestrian A46 Shurdington

Conclusions

The present levels of traffic in Leckhampton, and particularly along the A46 Shurdington Road, lead to a significant number of injury accidents every year, and a fatality roughly every two years. The proposed residential development in this area would produce a large number of extra car movements which would need to be controlled and carefully managed.

National Policy – The TA demonstrates that developing along the Shurdington Road corridor is contrary to NPPF.

I trust that the above comments will be given due weight and request that this letter is passed on to the planning case officer and highway development control officers accordingly.

I look forward to hearing from you shortly.

Yours Faithfully

[redacted]

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13/01605/OUT

Land at Leckhampton

Representations

Batch 5

Nam[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Page 688

Address linden hodge, 205 Old Bath Road, Cheltenham GL53 9EF

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

DC/PL
Recd 04 NOV 2013
ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Traffic congestion is already very evident in the area. Road conditions are deteriorating in rainy weather flooding is evident in all areas of Leckhampton - as water travels from Leckhampton Hill - having green space becomes waterlogged.

[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ....1, Southfield Close, Leckhampton GL53 9LE

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

[illegible]
[illegible] 2013
ENVIRONMENT

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Other comments: Encroachment into the countryside with housing development will change the nature & character of Cheltenham. It is the onset of urban sprawl, changing the agricultural influence on our town & putting strain onto our already stressed services

Na[redacted] **Ref: Planning Application 13/01605/OUT**

Address 1, PEREGRINE ROAD, BECKHAMPTON, CHELT, GL53 0LW

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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Rec'd 04 OCT 2013
DEVELOPMENT

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Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 59 MOOREND CRESCENT, BECKHAMPTON, GL53 0EJ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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2013
ENVIRONMENT

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(e) I ~~am~~ greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I live in Moorend Crescent & work in Brockworth so I would be considerably affected in commuting to & from work & also generally.

I have an allotment between Leckhampton Primary School & Burrows playing fields & I strongly value the fields in & around Leckhampton for its landscape, wildlife views from the Hill.

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 33 ST. MICHAELS ROWANDS, CHELT. GL51 3RP

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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Rec'd 04 NOV 2013
ENVIRONMENT

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Other comments: The traffic on A46 is already at capacity in the mornings, and having seen the volume of water that drains off the hill & fields I am NOT convinced by the developer plans to prevent flooding.

There are far too many homes in the plan and of course as usual the main objective is money regardless of the consequences.

REF 13/01605/OUT

Nam[redacted]: **Planning Application 13/01605/OUT**

Address 20 WOODLANDS RD GL51 3RU

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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RECEIVED
0 [illegible] 2013
ENVIRONMENT

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Other comments: IF THEY LEAVE THE FOOT PATH THROUGH TO THE VILLAGE AND THE HILL O/K. SCHOOLING NEEDS TO BE LOOKED AT BOTH JUNIOR & SECONDARY. ~~CAN~~ THE IS THERE IS A NEED FOR SCS, NPPF, ONS. LWWH. ALL THE COUNCILS TRAFFIC PEOPLE TO ALL GET ROUND A TABLE + SORT OUT EVERYTHING BEFORE BUILDING STARTS.

Nam [redacted] **: Planning Application 13/01605/OUT**

Address 4 CHARNWOOD ROAD, CHELTENHAM, GLOS GL53 0HJ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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BUILT
[illegible] 2013
ENVIRONMENT

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Other comments: .....

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Nam[redacted] **Ref: Planning Application 13/01605/OUT**

Address 31....S.T....MICHAEL'S....RD....WOODLANDS.....CHELTENHAM....GLOS.

(include, delete or modify the following statements as appropriate)

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DEPT
04 NOV 2013
ENVIRONMENT

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Other comments: Shurdington would inevitably become joined to Cheltenham and so would Leckhampton and finally the whole valley would be filled with housing as Gloucester continues to spread. Enough is enough.

Name [redacted] .... **Ref: Planning Application 13/01605/OUT**

Address 24 MOOREND ROAD CHELTENHAM GL53 0EU

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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Rec'd 04 NOV 2013
ENVIRONMENT

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Other comments: .....

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Name [redacted] **f: Planning Application 13/01605/OUT**

Address 7 SOUTHCOURT CLOSE CHELTENHAM GLOS GL53 0JL.

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

04 NOV 2013
ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: WE WOULD LIKE TO SEE DEVELOPMENT ACROSS ARE POINT AND ALONG INFRASTRUCTURE UPGRADES FOR THE DEVELOPMENT OF ROAD, SEWERAGE + INTERNET CAPACITY UPGRADES IN AREA OUTSIDE OF DEVELOPMENT.

Nam[redacted]. **Ref: Planning Application 13/01605/OUT**

Address ...25 Warren close Warren Hill Cheltenham GL51 3HW.

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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BUILT
Rec'd 04 NOV 2013
ENVIRONMENT

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Other comments: .....

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Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 1 HANNAH CLOSE Page 710 HAMPTON CHELTENHAM GL53 9AS

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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Rec'd 04 NOV 2013
ENVIRONMENT

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Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 76 CHURCH ROAD LECKHAMPTON CHELTENHAM GL53 0PD

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

✓ (a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

✓ (b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

✓ (c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd 04 NOV 2013
ENVIRONMENT

✓ (d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

✓ (e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments:

d) As I suffer from COPD which may or may not have been exacerbated by the present traffic levels in Church Road I would definitely not want to see this congestion increase further.

[redacted]

Nar[redacted]f: **Planning Application 13/01605/OUT**

Address 12 HALL ROAD, LECKHAMPTON, CHELTENHAM GL53 0HE

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd 04 NOV 2013
ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ☒ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Nam [redacted] **Ref: Planning Application 13/01605/OUT**

Address 6 CHARNWOOD RD. LECKHAMPTON CHELTENHAM GL53 0HS

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Recd 04 NOV 2013
ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 4 HIGHWOOD AVE CHELTENHAM GL53 9JJ.

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

BUS
Recd 06 NOV 2013
ENVIRONMENT

PTO

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name ..... [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address .....23, HAWKS WOOD ROAD, WARDON HILL CHRT.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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Recd 04 NOV 2013
ENVIRONMENT

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(e) I/ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: flooding, TRAFFIC, WILDLIFE,

Nar [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 8 ARDEN ROAD Leckhampton Cheltenham GL53 0HQ

(include, delete or modify the following statements as appropriate) 31st October 2013

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

√ (b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

√ (c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Recd 04 NOV 2013
ENVIRONMENT

✓ (d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

✓ (e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 338 OLD BATH RD, CHELTENHAM GL53 9AF

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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04 NOV 2013
ENVIRONMENT

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(e) ~~My~~ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 10 Langley Road Cheltenham GL53 0EJ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Received
04 NOV 2013
ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I/we my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

No provision for secondary school placed.

There has already been deaths on Shurdington Road this level of congestion can only lead to more lives are/will be put at risk

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 16 Hazlewood Close, Cheltenham GL51 3RX

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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04 NOV 2013

ENVIRONMENT

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Other comments: .....

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Nam[redacted] .. **Ref: Planning Application 13/01605/OUT**

Address ...3....TRGELANDS.....CLOSE.....CHELTENHAM.....GL53.0DF....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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[illegible] 2013
ENVIRONMENT

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Other comments: .....

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Name [redacted]

Address [redacted]: Planning Application 13/01605/OUT

Page 732

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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Recd 04 NOV 2013
ENVIRONMENT

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Other comments: .....

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Received 04 NOV 2013 ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably ~~to January 2014~~)

Comments & Observations on 650 House Application on Leckhampton Green Fields

WE OBJECT TO THIS DEVELOPMENT. THE ROAD INFRASTRUCTURE CANNOT COPE WITH THE VEHICLES PRODUCED BY THIS DEVELOPMENT. OTHER DEVELOPERS HAVE RECOGNISED THIS ALREADY. THERE ARE INSUFFICIENT SENIOR SCHOOL PLACES WHICH, AS PARENTS, CONCERNS US. WE REGULARLY WALK OUR DAUGHTER THROUGH THE FIELDS PROPOSED FOR DEVELOPMENT & ENJOY SEEING THE ANIMALS. THIS LAND & ITS WILDLIFE IS ENJOYED BY MANY PEOPLE INCLUDING US AND IT SHOULD BE PROTECTED. THIS DEVELOPMENT WILL SPOIL THE CHARACTER OF LECKHAMPTON FOREVER. THIS APPLICATION IS PREMATURE & SHOULD NOT GO BEFORE THE COUNCIL UNTIL THE JCS IS FINALISED & TRANSPORT, ENVIRONMENT & POPULATION ESTIMATES ARE VERIFIED.

Name MR & MRS CORNES Ref. 13/01605/OUT

Address 15 KINGFISHER CLOSE

[redacted]

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

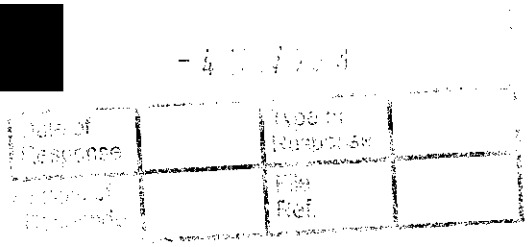
THE GREEN FIELDS ARE A NECESSITY FOR THIS GENERATION AND FUTURE GENERATIONS FOR THEIR WELLBEING AND QUALITY OF LIFE WE SHOULD NOT LEAVE THEM A CONCRETE JUNGLE

Name [redacted]

Address 33 SOUTHCOURT DRIVE LECKHAMPTON CHELTENHAM GLOS. GL53 0BU

Ref. 13/01605/OUT
Recd 04 NOV 2013
ENVIRONMENT

[redacted]



130 Warden Hill Road
Cheltenham
GL51 3EH

31st October 2013

Dear Sirs/Madams,

I am writing to voice my objections to the proposed development of new homes being built on Leckhampton fields. Reference 13/01605/OUT

As a local resident I frequently travel by car from Warden Hill to Leckhampton and beyond, using the current roads and am aware of the congestion which already exists along these routes. I believe that any increase in traffic would be a massive price to pay to gain new homes in this area. As a cyclist I am aware of the limited road space, and there are no footpaths along some of the 'back routes'- as there is only just space for two cars to pass as it is. At present it is a relatively safe area for young people to get out on their bicycles, learning independence and getting exercise in a rural setting. This would be lost, I fear. The area is highly valued as a beautiful space as it stands, and should not be developed. It gives access to the countryside and country walks to those living modestly locally, which is of great value and benefit. The walks across the fields and up the hill are a pleasure and should be treasured and preserved.
Furthermore, there are other issues of concern to me, such as potential flooding, pressure on over-subscribed schools and provision of other amenities. I am afraid that the need for housing is not great enough for us to lose what we have here.

Yours faithfully[redacted]

Rosalind Forster, Mrs

130 Warden Hill Road, Cheltenham, GL51 3EH

Nam[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address Myrtle Cottage Croft Page 737 Rockhampton Cheltenham.

BUILT

Rec'd - 5 NOV 2013

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road. & Bath Road which already gets blocked by cars & lorries due to interference from councils trying to improve it. Instead of free flow it stops often during day.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: To Take my grandchild through the lanes & fields is enjoyable to us both & Soon We will join up with Churchdown & it is not good enough. Playing fields are not the same as a good wander through Gods creation (FIELDS) The wild life would also suffer. Still what are animals & our feelings where Profit is concerned Today it is (9 all night Jack)!

Name [redacted] Ref: Planning Application 13/01605/OUT

Address 35 WELLS CLOSE CHELTENHAM GL51 3BX

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected and deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I and my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: the government websites promote better health - mentally and physically, by encouraging all of us to walk regularly, join in rambling groups and local 'health' walks, is being made a mockery by these proposed developments in the very areas we use for our welfare

[redacted]

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address .....3 PILFORD ROAD CHARLTON KINGS.....

(include, delete or modify the following statements as appropriate)

Rec'd - 5 NOV 2013

I wish to object to the proposed development on the following grounds:

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Other comments: .....

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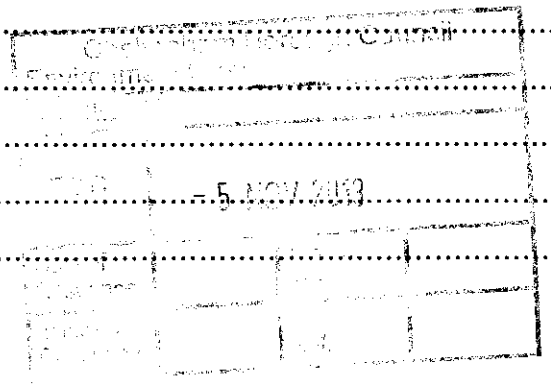

Name [redacted] Ref: Planning Application 13/01605/OUT

Address 11 TREELANDS DRIVE CHELTENHAM GL53 0DG

(include, delete or modify the following statements as appropriate)

Rec'd - 5 NOV 2013

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / ~~deeply concerned~~ by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~X~~ / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

TOO MUCH TRAFFIC CONGESTION ALREADY ON LECKHAMPTON, BATH AND SHURDINGTON ROADS.

5 MAY 2013

Ref: Planning Application 13/01605/OUT

Name [redacted]

Address 298 OLD BATH ROAD, CHELTENHAM GL53 9AP

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) ~~I am~~ personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~My~~ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: ILL CONCEIVED PLAN. CHURCH ROAD ALREADY A PROBLEM FOR CARS TRYING TO PASS EACH OTHER. I HAVE LOST TWO DOOR MIRRORS AND THE OFFENDING CARS NEVER STOPPED. SHURDINGTON ROAD GRIDLOCKED EACH MORNING BY CARS TRYING TO GET INTO CHELT

[redacted] Ref: Planning Application 13/01605/OUT

Name [redacted] CHELTENHAM GL53 0JW

Address 3 KENELM GARDENS

(include, delete or modify the following statements as appropriate)

- 5 NOV 2013

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

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(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I agree with all the above and comment that congestion on the A46 (Shurdington Road) has worsened every year since we came to Cheltenham in 1975

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 71 ST MICHAELS RD, Page 749 HILL, GL51 3RP

(include, delete or modify the following statements as appropriate)

- 5 NOV 2013

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I am deeply concerned about flood potential in Warden Hill which is already prone to flooding.

- 5 NOV 2019

Ref: Planning Application 13/01605/OUT

Name [redacted]

Address 2, CHARNWOOD CLOSE, GL51 [redacted]

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

- 5 NOV 2013

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: The Leckhampton fields are much used for recreation and exercise and do, I feel sure, contribute to Government's policies to reduce obesity and promote better health.

- 5 NOV 2013

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 23, Alden Road, Cheltenham GL53 0HG

(include, delete or modify the following statements as appropriate)

Rec'd - 5 NOV 2013

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / ~~my family~~ greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

The above says it all.

- 5 NOV 2013

Name ..... [redacted]

Address ..... Bliswarth College, Short Street. GL53 ..... **Ref: Planning Application 13/01605/OUT**

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

- 5 NOV 2013

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name ...MR S H [redacted]

Address ...[redacted] DRIVE, LECKHAMPTON, GL53 0BT.

Page 131 Ref: Planning Application 13/01605/OUT

(include, delete or modify the following statements as appropriate)

WE **wish to object to the proposed development on the following grounds:**

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) ~~I am personally affected~~ WE ARE / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~I/my family~~ WE greatly value the Leckhampton fields for recreation. WE strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments:

CHELTENHAM BOROUGH COUNCIL WILL HAVE TO BEAR THE BRUNT OF DECISIONS MADE BY TEWKESBURY !! HOW CAN THAT BE FAIR TO CHELTENHAM COUNCIL TAX PAYERS?

IF YOU ABSOLUTELY MUST BUILD MORE HOUSES THEN INSIST ON BUNGALOWS ONLY.

[redacted]

Address 10 Oxford Way, Warden Hill, Cheltenham. GL51 3HJ

Ref: Planning Application 13/01605/OUT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

Rec'd - 5 NOV 2013

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Other comments: .....

Name [redacted]

Addre [redacted]

Ref: Planning Application 13/01605/OUT

(include, delete or modify the following statements as appropriate)

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) ~~I am personally affected~~ We are / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~I~~ / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Agree with all the ABCDE.
Very concerned regarding traffic flow & congestion + pollution in this area of Warden Hill & Leckhampton

N[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ..... 1 Pilford Road Leckhampton Cheltenham

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

- 5 NOV 2013

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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Other comments:

(1) It appears the survey is incorrect in its conclusion

(2) Are you listening to the people of Cheltenham?

(3) Be well paid local officials your responsibility is to get the right!

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

The application is far too large - the surrounding roads will become gridlocked - they barely cope with the traffic now!
Where will the senior children continue their education? Some children already go to Chanester because they cannot rely on Balcarras or Bournside offering them a place.
Decisions are being made by people who do not live here - is that fair?

Rec'd - 5 NOV 2013

Name [redacted]

Ref. 13/01605/OUT

Address 125 LECKHAMPTON ROAD. CHELTENHAM.

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

It seems that the majority of locals object to this planning so why are we not heard?
I belive that the plans are short sighted and purely commercial. This location is beautiful and does NOT lend itself to mass building. The roads structure will not take it. The A46 is bad enough already. No plans have been made for additional Secondary education. The flood testing I believe to be inaccurate as these fields are continually waterlogged now.

NOV 2013

Ref. 13/01605/OUT

Name [redacted]

Address 15 Allenhold Rd GL53 0LX

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Interference with existing roads, resulting in vast increase in traffic from what amounts to an additional village crammed into too small a space on to Shurdington Road.

Developers clearly wish to bully local councillors with spurious claims to force through their own self-interested plans.

Rec'd - 5 NOV 2013

Name [redacted]

Ref. 13/01605/OUT

Address 3, PILFORD ROAD, GL 53 9AG

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Would like to mention that the road infrastructure around Shurdington Rd & Leckhampton Lane is already "broken" with more vehicles using roads adjacent likely to cause danger & safety issues.

This application should NOT proceed until JCS for the area has been resolved, & that housing needs & targets have been verified.

Ref. 13/01605/OUT

Name [redacted]

Address The Cottages, Leckhampton Lane Shurdington. Glos. GL51 4XW.

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

5 NOV 2013

Comments & Observations on 650 House Application on Leckhampton Green Fields

No thank you.
As already stated these are green fields a dwindling resource for the numerous wakes and runners and oxygen breathers Any housing must be sustainable, solar panels, recycled water or they will create shortages for existing residents
There are no jobs in Cheltenham so driving 30 miles or so along very crowded roads will cause gridlock.

5 NOV 2013 Ref. 13/01605/OUT

Name [redacted]

Address 10 Hobby Close GL53 0LP

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE

13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Rec'd - 5 NOV 2013

Comments & Observations on 650 House Application on Leckhampton Green Fields

Given that the JCS state there is a need for 33,000 houses in the area, how is the infrastruc to sustain so many vehicles spilling out onto to A46? The present sewage and power services, doctors, schools, libraries cannot service another 650 houses / 1500 (approx) inhabitants. "Greenbelt" should be Greenbelt, ie protected areas to preserve space between towns and villages.

Leckhampton has been my home for over 40 years and once a village. Now you want to fill the green fields between Leckhampton and Shurdington Village. We don't need them!

Ref. 13/01605/OUT

Name [redacted]

Address 5 Southcourt Drive
Leckhampton
Cheltenham GL53 0BU

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

PLEASE LISTEN TO THE RESIDENTS OF CHELTENHAM BECAUSE THESE ARE THE PEOPLE AND VOTERS WHO WILL DEAL WITH THESE PLANNING APPLICATIONS FOR THE FUTURE. A

Rec'd - 5 NOV 2013

Ref. 13/01605/OUT

Name [redacted]

Address 289 OLD BATH RD. LECKHAMPTON CHELT GL53 9AJ

Name [redacted]

Address 48 LICHFIELD DRIVE, CHELTENHAM, GLOS. GL51 3DR

Ref: Planning Application 13/01605/OUT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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Rec'd - 6 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments:

I totally agree with the above main objections to the planning applications

Recent floodings on the A46, which resulted in single file, which made it more slow moving + more pollution

Name [redacted]

Address [redacted] Rise, Leckhampton, Cheltenham

Ref: Planning Application 13/01605/OUT

(include, delete or modify the following statements as appropriate)

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Recd - 6 NOV 2013
ENVIRONMENT

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Other comments: TO DEVELOP HERE WHEN TOTALLY UNNECESSARY WOULD BE BOTH RIDICULOUS, WRONG & COMPLETELY RUIN A BEAUTIFUL AREA ENJOYED BY SO MANY. CHELTENHAM NEEDS TO PROTECT AREAS SUCH AS THIS FOR NOW & THE FUTURE PUBLIC OPINION SHOWS IT IS EMPHATICALLY AGAINST THESE PROPOSED DEVELOPMENTS

Name [redacted]

Address 10 Pickering Road, Leckhampton, Cheltenham GL53 0LB **Ref: Planning Application 13/01605/OUT**

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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Recd - 6 NOV 2013

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Other comments:

(f) As an adjunct to (d) we feel grave concern for the health and safety of cyclists and pedestrians on the A46 and in all the areas affected. There appears to be no provision for these greenest of road users.

(g) We are troubled that nothing is proposed to encourage the use of public transport, not even a capacious Park and Ride facility on the A46.

Name [redacted]

Addres[redacted] OLD BATA ROAD, LECKHAMPTON, CHELTENHAM GLOS GL53 9AF

Ref: Planning Application 13/01605/OUT

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I wish to object to the proposed development on the following grounds:

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

RECEIVED
- 6 NOV 2013
ENVIRON...

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(e) ~~My~~ My family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

~~Other comments:~~ .....

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Name [redacted]

Address [redacted] Salisbury Avenue. GL51 3BS

Ref: Planning Application 13/01605/OUT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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Road - 6 NOV 2013

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Other comments: Our property was severely affected by flooding in 2007 and although not affected now, properties near us continue to experience issues with foul water. The impact of all this building on fields is scary to contemplate, where will all the surface run off go? We are at the bottom of Warden Hill. Leave the fields alone - they're a delicate balance which will affect hundreds of homes vulnerable.

Name [redacted]

Address 10, Lynton Close, Leckhampton, Cheltenham GL53 0QA **Ref: Planning Application 13/01605/OUT**

(include, delete or modify the following statements as appropriate)

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Rec'd - 6 NOV 2013

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Other comments: Please see enclosed email I sent to JCS Consultation on 4th Feb 2012 for additional comments.
FYI I have yet to receive a reply.

Name [redacted]

Addres[redacted] **Ref: Planning Application 13/01605/OUT**

(include, delete or modify the following statements as appropriate)

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd - 6 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted]

Address 45 WINCHESTER WAY, WARDEN HILL, CHELTENHAM

Ref: Planning Application 13/01605/OUT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Recd - 6 NOV 2013

(d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: WARDEN HILL (INCLUDING OUR HOUSE) WAS FLOODED RECENTLY — MORE LECKHAMPTON HOUSING WILL INCREASE THE POSSIBILITY OF MORE FLOODING

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 102, LEckhampton Page 788 Road CHELTENHAM GL53 0BX

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd - 6 NOV 2013

(d) I am ~~personally affected~~ deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I & my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Taking today as an example (4 Nov 13) a horrendous accident has created a huge traffic jam in Leckhampton/Shurdington and Bath Roads. No traffic easing could sort that out and all it means is moving a traffic jam further down the road and creating more rat-runs

Name [redacted]

Address [redacted] Canterbury Walk, Warden Hill, Cheltenham

Ref: Planning Application 13/01605/OUT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Recd - 6 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

Name [redacted]

Address 10 FARMFIELD ROAD WARDEN HILL CHELTENHAM GL51 3RA

Ref: Planning Application 13/01605/OUT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Recd - 6 NOV 2013

ENVIRONMENT

(d) I am personally affected and deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I and my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: It is also gravely worrying that the traffic pollution levels already exceed EU permitted levels in this area and the development proposal would enormously add to that. What about our health? What about our safety? - We have already witnessed accidents on the Shurdington Rd of people pulling out of junctions, desperate to fit in between the massive flow of cars. What about school for our 2 children? Will they have a place? This proposal has not been rationally considered in our opinion.

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 6 STATION CLOSE CLEEVE HAMPTON · CHELTENHAM GL53 0AB

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd - 6 NOV 2013

(d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ✓ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments:

Please do not ignore local residents views on this major issue. "Politics must be tempered when finalising your conclusions".

[redacted]

Nam [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ....8....PEREGRINE ROAD, CHELTENHAM, GL53 0LR.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd - 6 NOV 2013

ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~I~~ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

- As a local cadet I'm very concerned about the increased traffic on the A46 the road is already very congested and this will only become worse
- lack of schools (specifically secondary), no plans to increase places for potential increase in local population

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 10 Alderfield Road Cheltenham

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Recd - 6 NOV 2013
ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I believe the traffic modelling will be based upon false assumptions, i.e. that existing traffic levels can be extrapolated in proportion to the number of households. The existing demographic is weighted towards mature and retired people who make less journeys by car than the working age population that the new housing is targeted towards.

Name .... [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ....22 HALL ROAD, CHELTENHAM, GL53 0NE

(include, delete or modify the following statements as appropriate)

RECEIVED - 6 NOV 2013 DEVELOPMENT BUILT

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems. Strongly agree esp on 8.00 commute

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

& create a 'rat-run' in Hall Road where there is already school-related congestion

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Too many assumptions to consider development proposal a partial option highlighted concerns are a lack of Secondary School places plus the calculations used to estimate future employment opportunities (a deeply flawed assumption)

Ref: Plan

Name [redacted]

Address [redacted] 83 MOOREND RD CHELTENHAM GL53 0

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

RECEIVED
Recd - 6 NOV 2013

deeply concerned by the health and accident risks from the traffic would result from the proposed development.

My family greatly value the Leckhampton fields for recreation. I strongly support the case made for the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted]

Address 8 TERRANDS Close CHELTENHAM, Glos, GL53 0DF

Ref: Planning Application 13/01605/OUT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

✓ (a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

✓ (b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

✓ (c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd - 6 NOV 2013

ENV[illegible]

(d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / ~~my~~ family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Na[redacted] Ref: Planning Application 13/01605/OUT

Address ...[illegible] Leckhampton Rd, Cheltenham

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

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Recd - 6 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: There would be insufficient senior school places available. It is important to have easily accessible areas for wildlife, healthy + safe exercise & quiet for our sanity + well-being

Name .: [redacted]

Address ..2 LARCHMERE GROVE GL513NS..... **Ref: Planning Application 13/01605/OUT**

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Recd - 6 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

Page 809

(e) I / ~~my family~~ greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Na[redacted]

Add[redacted] **Ref: Planning Application 13/01605/OUT**

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Recd - 6 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I/my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: - SECONDARY SCHOOL PLACES IN THIS AREA (BOURNSIDE + BALCARRAS) ARE ALREADY AT A PREMIUM - THIS CANNOT BE IGNORED

- ALREADY TOO MUCH TRAFFIC IN AREA & POLLUTION AND HAVE ALREADY WITNESSED NUMEROUS NEAR MISSES WITH TRAFFIC ON SCHOOL RUN (+ ONLY BEEN DOING SCHOOL RUN JUST OVER A YEAR. IT IS SIMPLY NOT SAFE + MORE TRAFFIC WILL EXACERBATE PROBLEM

Nam[redacted] **Ref: Planning Application 13/01605/OUT**

Address 21, Chelmsford Avenue, Warden Hill, Cheltenham GL51 3DL

(include, delete or modified the following statements as appropriate)

Rec'd - 6 NOV 2013

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

object to [redacted] development on all of these grounds

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: We have lived in Warden Hill for 54 years (new house) & we have seen many changes but none so ludicrous as what is being planned for this area, I am sure the planners etc have no understanding of the area at peak time on Shurdington Rd plus flooding in Warden Hill those ponds!!! will be useless. We cannot understand where the jobs!! will be/ schools, Senior school, primary definitly needed!!

Name .... [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 51 CANTERBURY WAY CHELTENHAM GL51 3HN

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Recd - 6 NOV 2013

ENV

(d) I am personally affected and deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 11 MOREL GL53 9EN

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems [redacted]

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

[redacted]

Road - 6 NOV 2013

ENV

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: These proposals are totally unnecessary and unwarranted. They will bring about the total decimation of these green field sites and destroy the character of the villages of Leckhampton, Shurdington and Bentham as well as whats left of Hatherly. Vehicle numbers will also increase proportionally, further congesting over crowded roads.

[redacted]

Stop now! - while no more harm has been done.

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 4, PICKERING CLOSE, BECKHAMPTON, CHELTENHAM, GLOS GL53 0LE

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

BUILT
Rec'd - 6 NOV 2013
ENV

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I have seen the traffic in this area triple in recent years. There is already a queue going back over a mile to get into Leckhampton every morning along the Shurdington Road. Further housing in this area will cause further gridlock, and increased pollution, and completely spoil the rural surroundings

Name .... [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address .....8 STATION CLOSE, BRKHAMPTON GL53 0AB.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rcvd - 6 NOV 2013
EN

(d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

I strongly object to the proposed development as it will spoil a very special corner of Cheltenham.

B Hall

Name [redacted] ... **Ref: Planning Application 13/01605/OUT**

Address .....7 GREENHILLS CLOSE, CL53 4EJ.....

(include, delete or modify the following statements as appropriate)

WE **wish to object to the proposed development on the following grounds:**

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Recd - 6 NOV 2013

(d) ~~I am personally affected~~ WE ARE deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~I~~ WE my family greatly value the Leckhampton fields ~~for~~ recreation AREA, AND strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: IT IS A GROSS INJUSTICE, IGNORED BY POLITICIANS FOR FAR TOO LONG, THAT THE FUTURE OF THIS VALUABLE PART OF CHELTENHAM SHOULD BE DECIDED BY TEWKESBURY BOROUGH COUNCIL

[redacted]

13/01605/OUT

Na [redacted] **Reference: JCS Consultation**

Address 21, Chelmsford Avenue, Warden Hill, GL51 3DL

(include, delete or modify the following statements as appropriate)

(a) In accordance with the NPPF, the JCS must objectively estimate the housing need for Cheltenham and not exaggerate it. Where there is uncertainty the JCS must use the lower figure and keep land in reserve to respond flexibly if the housing need should turn out to be larger. The JCS must not risk allowing building on the green belt and the Leckhampton fields and then finding too late that this building was not necessary to meet the actual housing need.

(b) In accordance with the NPPF, the JCS must properly address the need for building a strong, competitive economy and must contain a genuine and realistic plan for fostering employment growth and for the transport and other infrastructure needed to support this.

(c) In accordance with the NPPF, the JCS must promote sustainable transport. The housing developments currently proposed in south Cheltenham would have a devastating impact on traffic and completely break the transport system. This is utterly unacceptable.

[illegible]
Rec'd - 6 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the currently proposed developments.

(e) I am deeply concerned over future schooling and the danger that the proposed developments will leave no / many children without local schools.

Other comments: We have lived in Warden Hill 54yrs + have seen many changes but none so ludicrous as what you have planned for this area. Shurdington Road is grid locked at peak times (2 a day) flooding is bad here now, we are having heavy downpours & with all the concrete etc with all those houses those ponds will be useless. We think your estimate is badly flawed + should be vastly reduced.. which ONS estimates. the figure should be 6,070.. Where are the Jobs!! Schools senior/primary.

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 1 SOUTHERN ROAD, CHELTENHAM, GL53 9AN

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd - 6 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: We feel that greenfield sites should only be developed for housing as an absolute last resort. They can never be reclaimed. There are still brownfield sites in the town which could be developed first (eg. Haines + Strange site, North Place, etc). The objections concerning traffic congestion, lack of school & other amenities are of overwhelming importance.

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 32 Lichfield Drive Warden Hill GL51 3DH

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rcvd - 6 NOV 2013

(d) I am personally ~~affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Crickly Hill closed 4/11/13 due to accidents. Our roads (A46) were gridlocked by traffic trying to get to Cheltenham, Gloucester etc

Why can't these houses be built by A40 — Cirencester / Charlton Kings?

[redacted] **f: Planning Application 13/01605/OUT**

Name [redacted]

Address 347 OLD BATH ROAD, LECKHAMPTON, CHELTENHAM, GL53 9AH

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Road - 6 NOV 2013

ENVIRO

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: With a plan that has such far-reaching and dramatic consequences for the Leckhampton area it seems both negligent and unprofessional not to have given proper thought to its impact on local infrastructures (roads, schools, traffic flow) It must not be allowed to pass without proper consideration of the points herein.

[redacted] 1/11/2013

Name [redacted] Ref: Planning Application 13/01605/OUT

Address 28B Canterbury Walk, Leckhampton Hill, Cheltenham, GL51 3HG

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd - 6 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I recently moved to this area because of the beautiful green surroundings of the fields near to warden Hill. Why make an already populated area overcrowded? This is completely the wrong area to be building a high volume of housing. The Shurdington Road already struggles to cope with traffic in the mornings with people driving to work and school. It is a massive worry that this will get even worse, I think extra houses in this area would be a massive problem and add unnecessary issues to the area - DO NOT BUILD HERE!

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address [redacted] Kidnalls Lane Cheltenham

(include, delete or modify the following statements as appropriate)

We **wish to object to the proposed development on the following grounds:**

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd - 6 NOV 2013

ENV

We are

(d) ~~I am~~ personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~I~~ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Nam[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 357 OLD BATH ROAD CHELTENHAM GL53 9AH .....

Rec'd
Rec'd - 6 NOV 2013
ENVIR

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road. and beyond.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Already I can travel by bus from Cheltenham town centre along the A40 to the city of Gloucester (9 miles away) quicker than the bus can take me to my own home in Leckhampton. This is a ridiculous situation and cannot be allowed to worsen.

DISTRICT
Rec'd 6 NOV 2013
ENVIRONMENT

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 38 MOOREND ROAD, CHELTENHAM GLOS. GL53 0BU

Recd - 6 NOV 2013
ENVIRONMENT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: The LWWH Parish Council documenting their objections is excellent and comprehensive and should be fully taken into account. The traffic congestion in Shurdington, Moorend & Church roads at peak hours is a real problem and an up to date traffic survey is needed. The growth in the number of heavy commercial vehicles must be recognised and the excessive pollution they cause. Likewise the effect of all the proposed houses (the number of which is excessive and needs to be rethought) will have a disastrous affect on the infrastructure.

Recd - 6 NOV 2013

ENV

Nam[redacted] **f: Planning Application 13/01605/OUT**

Address 58 MOOREND Park Road, GL53 0HD

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work ~~they will cause~~ big traffic increases elsewhere, such as in Moorend Park Road.

BUILT
Recd - 6 NOV 2013
ENVIRONMENT

(d) I am personally affected & deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I firmly support all the objections raised by Leckhampton + Warden Hill Parish Councils. Church Rd + Shurdington roads are already over-congested. Have members of the JCS themselves tried travelling on them at peak periods? The green fields provide one of the few nature reserves where wildlife is still able to survive to the benefit of everybody. There is no firm evidence that so many new homes are necessary.

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 4, LECKHAMPTON FARM COURT, CHELTENHAM GL51 9QS

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

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(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development. ✓

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill. ✓

Other comments: This is a beautiful rural area that will be completely changed to a suburban area by this amount of building. Local people must surely have some say in their environment. We are, after all, still supposed to be a democracy not living in a dictatorship

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 20 TREGLANDS CLOSE GL53 8DF

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rcvd - 6 NOV 2013
ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Nam[redacted] **Ref: Planning Application 13/01605/OUT**

Address 57 Collum End Rise Cheltenham GL53 0PA

BUILT ENVIRONMENT
Rcvd - 6 NOV 2013

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over h[redacted]nd transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development togethe[redacted] proposed developments south of Cheltenham would create horrendous traffic queues in the peak [redacted]s. The planning application offers no solution to the grave traffic problems[redacted]

(c) The suggestions made in the application for preve[redacted]nd gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road. Recent accidents have illustrated how horrendous congestion can occur. We must get our traffic planning right.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development. [redacted]

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Church Road is a major route to the Primary School. Increased traffic must not increase the danger to our children.

Without jobs we cannot envisage these huge increases in population. We would be building to house commuters to Bristol, Oxford and Birmingham

Proposed changes to Kidnappers lane + Leckhampton Lane will only add more congestion + pollution f.l.

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 16 TAMARISK CLOSE, GL51 3NL

BUILT
Rcvd - 6 NOV 2013

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I AM CONCERND ABOUT COUNCIL HOUSE VALUES BEING EFFECTED AND STRONGLY AGREE WITH ALL OTHER OBJECTIONS

Name [redacted]

Planning Application 13/01605/OUT

Address 105, Church Road, Leckhampton, Cheltenham, Glos GL53 0PF

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

- 6 NOV 2013

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) We are ~~I am~~ personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~My~~ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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[redacted] Ref: Planning Application 13/01...

Name ... [redacted] ...e 852 CHELTENHAM

Address 5 SOUTHFIELD RD

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

BUILT
Recd - 7 NOV 2013
ENVIRONMENT

am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 58 COLLUM END Page 854 GL53 0AB

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload ~~and gridlock in Church~~ Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

DISTRICT
Rcvd - 7 NOV 2013
ENVIRONMENT

(d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: BEFORE GRANTING PLANNING ADMISSION FOR GREENBELT. SHOULD WE NOT BE LOOKING AT THE LONG EMPTY SITES OF THE ODEON CINEMA HANLEY + STRANGE, BLACK & WHITE COACH STATION AND THE POTENTIAL FOR THE KIA MOSS SITE AT 96 LECKHAMPTON RD.

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

WE MOVED FROM CHARLTON KINGS TO LECKHAMPTON A YEAR AGO & OVER THE 4 YEARS FOUGHT A NUMBER OF PLANNING APPLICATIONS IN THAT AREA (NOT ALL BUT ONES THAT WERE NOTICABLE) THE LARGEST WAS A PROPOSAL IN AN AREA OF OUTSTANDING NATURAL BEAUTY AT THE TOP OF PAINSWICK RD. IT WAS A LONG HARD STRUGGLE BUT PLANNING WAS EVENTUALLY TURNED DOWN. THIS AREA SAVED. WE NEED GREENSPACE LIKE WE NEED OXYGEN. HAVE ALL BROWNFIELD SITES BEEN CONSIDERED OR IS THIS AN EASIER OPTION 650 HOUSES IS TOO MANY IN THIS AREA WE WOULD STRUGGLE TO COPE WITH ADDITIONAL TRAFFIC, SCHOOLING & HEALTH CARE

Name [redacted]

Address 20 TREELANDS CLOSE
LECKHAMPTON GL53 0DF

Ref 13/01605/OUT

BCP
Recd - 6 NOV 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

This application is premature, and should not go before the planning committee until the Joint Core Strategy for the area of Cheltenham, Tewkesbury and Gloucester City has been finalised.

My specific objections are:

* Increased traffic on Shurdington Road.
* Lack of school places available for our children

Rec'd - 6 NOV 2013

EDT

Name [redacted] Ref. 13/01605/OUT

Address 62 Moorend Park Road

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

APPLICATION IS PREMATURE + SHOULD NOT GO AHEAD UNTIL THE JCS HAS BEEN FINALISED AND ALL ASPECTS (TRANSPORT, ENVIRO, POPULATION GROWTH) HAVE BEEN VERIFIED

Recd - 5 NOV 2013

Name [redacted]

Ref. 13/01605/OUT

Address 7 THE SPINDLES

GL51 0RD

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I believe the road infrastructure around Leckhampton cannot accommodate a significant increase in population without major congestion in Shurdington, Bath and Leckhampton Roads. The modelling of traffic flow based upon the current demographic of mature and retired people is not a sound assumption, as the new housing will mainly be taken by working age people who make far more frequent journies by car. Church Road, Hall Road, Moorend Park Road (near GP's), Moorend Road (nr Hall Road junction) and Leckhampton Road (near Coop) are effectively single tracked by parked cars, and other roads in this area would need restricted access to prevent "rat runs". The Bath Road roundabout will become blocked in peak hours.

Name [redacted]

Address 10 Hillersfield Road

Ref. 13/01605/OUT

Recd - 9

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

* No! to 650 houses
* Brown field sites should be used first
* Extra vehicles all exiting on to Shurdington Rd.
* Nearby roads becoming "rat runs"
* Not enough spaces at local Secondary Schools.

BUT
Recd - 6 NO
ENTD

Name [redacted]

Address [redacted]

Ref. 13/01605/OUT

Delivered by Royal Mail Bath Bristol 05.11.13 Cong Chri Desig

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT [redacted] January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

We are concerned about traffic queues and air quality that would result from this application. Traffic is likely to increase in Moorend Park Rd. which involves a doctors surgery, retirement flats and bus stops for secondary schools. Shurdington and Bath Roads are already at a standstill during peak times. This application is premature since the JCS is not yet finalised and there is a big question as to wiether there is a need for so many homes. We know the area will change but awarding planning consent before such health and safety problems are adequately dealt with would be madness

Name [redacted]

Address 19 ALLENFIELD RD GL53 0LX

Recd - 6 NOV 2013 ENVIRONME

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

THIS DEL. HAS TOO MANY HOUSES.
NO. THOUGHT HAS BEEN MADE AS TO THE TRAFFIC IMPLICATIONS AS THERE WILL BE ANOTHER 1000 CARS + TO CONTEND WITH ON THE A46 WHICH IS NOW BLOCKED TO SHURNINGTON EVERY DAY

PUT SMALLER NUMBERS OF HOUSES ON KIN VILLAGES AS EDGES OF TOWNS NOT ONE BIG LUMP IN ONE PLACE JUST TO USE LAND OFFLOADED BY THE CHURCH & THE COUNCILS.

Name [redacted]

Address 14 SOUTHCOURT DRIVE
GL53 0BT.

BUILT
Ref. 13/01605/OUT
Recd - 6 NOV 2013
EN

PUBLIC CONSULTATION ON THE JOINT CORE STRATEGY (JCS) **by 24th NOVEMBER**

Would the LIB DEM policy on the JCS and their threat to the Cheltenham Greenbelt and Open Countryside at Leckhampton affect YOUR VOTE in the local elections next May?

YES	NO
	✓

Comments & Observations on the Joint Core Strategy, 33,000 houses to 2031

AS ATTACHED TO CBC.

BUILT
Rec'd - 6 NOV 2013

Name .....

Address .....

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

We strongly object to the proposed road closures due result in an estimated 1000 extra vehicles driving on to Shurdington Road that is already at capacity at peak times. Our road network in the area is broken and over capacity. Air pollution due queue lengths in winter months. Do not have the infrastructure to cater for an increase in local population ie schools etc.

[redacted]

Name

Address 26 Rotherhere Close
Up Hatherley
Cheltenham, GL51 3UU

DUTY
Ref. 13/01605/OUT
Recd - 6 NOV 2013
ENV

Leckhampton with Warden Hill Parish Council

PUBLIC CONSULTATIONS ON THE DRAFT JOINT CORE STRATEGY AND ON A PROPOSAL FOR 650 NEW HOMES ON THE LECKHAMPTON FIELDS

The Gloucester-Cheltenham-Tewkesbury Joint Core Strategy has been opened a second time for public consultation. Even if you responded to the first consultation in 2012, it is important to respond again. You are also invited to respond on the planning application submitted by Bovis and Miller Homes to build 650 new homes on the Leckhampton fields.

PUBLIC MEETING ON PLANNING APPLICATION FOR 650 NEW HOMES

Leckhampton with Warden Hill (LWWH) Parish Council is holding a PUBLIC MEETING on **WEDNESDAY 27 NOVEMBER** at **7.30 pm** at **LECKHAMPTON PRIMARY SCHOOL**. Tracey Crews (Cheltenham Borough Council Director of Planning), Craig Hemphill (Planning Officer) and Mark Power from Gloucestershire Highways will be attending to answer questions and hear your views. ~~All local residents, whether~~ or not in the Parish, are invited.

MAIN OBJECTIONS TO THE PLANNING APPLICATION

1. The JCS may have greatly over-estimated how many new homes are needed

The JCS estimates that 10,800 new homes are needed in Cheltenham between now and 2031. It proposes building 6699 of these on greenfield sites - 1075 in Leckhampton, 795 between Chargrove Lane and Up Hatherley Way and 4829 in north-west Cheltenham. However, the government Office of National Statistics estimates that only 6070 new homes are needed. Based on the ONS figures, there is no need to build on the Leckhampton fields.

2. Traffic queue on A46

We already have long traffic queues on the A46. Expert analysis predicts that the 1075 new homes proposed in Leckhampton plus 1548 also proposed in Brockworth would make the morning A46 traffic queue over 3 miles long. It could take over an hour to commute into Cheltenham. And this does not include the other 795 homes proposed. A recent government report warns that towns where traffic prevents people commuting will drive jobs away.

It is very important to respond on the proposed development. You can use this tear off slip if you wish

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N[redacted]..... **Ref: Planning Application 13/01605/OUT**

Address 9 STATION CLOSE CHELTENHAM GL 53 0AB.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

√ (a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

√ (b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

√ (c) The suggestions made in the application for preventing traffic overload and ~~gridlock in~~ Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rcvd - 6 NOV 2013

ENV[illegible]

3. Traffic congestion in Church Road

The developers recognise that it is essential to prevent any substantial increase in the peak time traffic in Church Road, which is close to gridlock. Their suggested solution is to partially close Leckhampton Lane and to close Kidnappers Lane; then to make a tortuous route through the new development to hopefully discourage through traffic between the A46 and Church Road. Not only is this liable to cause many accidents but also it will substantially increase traffic levels on Moorend Park Road.

4. Traffic pollution from the A46 traffic queue and in Church Road

A new government report says that traffic pollution poses a serious health risk. Stationary and slow moving traffic causes the most pollution. Measurements by the Borough Council show that pollution levels already exceed EU-permitted limits near the A46 junction with Moorend Park Road. Pollution in Church Road has exceeded EU-permitted limits in winter.

5. Risk of flooding

The developers' flood prevention and drainage plan uses balancing ponds to capture run-off from the proposed development. Many of these ponds will be deep and well below the water table. So they might partially fill with water and would then not have sufficient capacity. The development could also affect underground water flows under the A46 into Warden Hill. The developers believe it should all work fine but they cannot be absolutely sure.

6. Lack of sufficient school places

The proposed development includes a new primary school, but this would not be built until a later stage in the development. In the meantime there would be no primary provision for the first 300 or so homes. For secondary schooling, Balcarras and Bournside are always over-subscribed. They are both academies and cannot be forced to expand. Balcarras has insufficient land to expand anyway. At the JCS public consultation event on 19 October, the JCS team could give no answer on secondary schooling to concerned residents.

7. The strong public opposition to development

The findings from the public surveys conducted by LWWH Parish Council at the exhibitions held by the developers showed very strong opposition to development on the Leckhampton fields. Over 94% of people were opposed or strongly opposed to the proposed development.

It is very important to respond on the proposed development. You can use this tear off slip if you wish

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(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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M - 7 NOV 2013 O

Lambertsweg 1
54617 Sevenig/Our
Germany

25/10/13

BUILT
Recd - 7 NOV 2013
ENVIRONMENT

Ref: 13/01605/OUT

Dear Planning Officers,
Cheltenham Borough Council,

I grew up in Hecklampton and my husband + I visit my mother for approximately 2 months every year (83 Hecklampton Road). Over the years, but especially recently, we have been horrified by the ever-increasing volumes of traffic, especially along Shurdington Road in to Bath Road. It is a serious problem already so we are both vehemently opposed to planning application no.

13/01605/OUT - Kidnappers Lane

Pollution is also a problem when walking as the fumes are choking and the air quality poor. To allow development

would be irresponsible as levels already exceed EU regulations at times.

The land in question is good quality agricultural land which should be used for growing local food and improving sustainability. Please use town / brownfield sites not irreplaceable, productive land.

This area is also used widely by walkers, horse riders, families, bird watchers for healthy exercise, relaxation and peaceful enjoyment. It is an important wildlife corridor.

Building on this land would present very real and serious risks of flooding in the area.

Please, please do NOT allow development on this massive scale here.

Thank you.

Yours sincerely

[redacted]

[redacted]

VIVIEN WEISE

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ...THE CEDARS, KENELM DRIVE. CHELTENHAM GL53 0JR

(include, delete or modify the following statements as appropriate)

DUTY
Recd - 7 NOV 2013
ENV

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: If all the brownfield sites and empty houses were used first there would be very little need for all this building Sadly developers are only interested in the money they will earn they don't seem to care for the lives of all those who will be blighted by all this extra building

[redacted] Ref: Planning Application 13/01605/OUT

Name [redacted]

Address 30 HALL ROAD GL53 0HE

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems, esp. pertaining to Church Rd & Shurdington Road

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: f) The proposed increase in secondary schod pupils would impact on the current secondary schools within the area. These schools are already over-subscribed and cannot cope with a further increase in numbers from the proposed development. This will only cause a further impact to existing local pupils who are planning to go to these over-subscribed schools.

g) The wildlife mitigation measures do not compensate for the overall permanent and significant loss of local biodiversity, g: field habitats and existing habitat connectivity. The development will also detract from this ru.

Nam [redacted] **Ref: Planning Application 13/01605/OUT**

Address ....55....COLLUM END RISE, CHELTENHAM, GLOS GL53 0PA

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rcvd - 7 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name . [redacted] **Planning Application 13/01605/OUT**

Address 3, Silverthorn Close Page 853 OJF

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd - 7 NOV 2013

(d) We all and am personally affected / ~~deeply~~ concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~My~~ My family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Once this is destroyed, we leave a most destructed legacy to all generations to come. PLEASE re-consider!

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ..WARDEN HILL GL51 3EP.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

- 7 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 47 Moorend Crescent, Cheltenham, Glos, GL53 0EJ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd - 7 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I use these fields everyday for dog walking. It is one of the many reasons we chose to live in this area - being close to town but within easy reach of lovely countryside.

But for me the main concern is secondary education, which doesn't appear to have been considered. Redevelop the empty properties in town and encourage more applications to under subscribed schools instead to boost their numbers.

Name ... [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 16 THOMSON DRV: LECKHAMPTON

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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Recd - 7 NOV 2013

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(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address ORCHARD VIEW, KIDNAPPED STONE, CHELTENHAM GL53 ONL

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

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- 7 NOV 2013

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Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address Flat 1, St Kenelm House, Shurdington Rd. Cheltenham, GL53 0JH

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will ~~cause big traffic~~ increases elsewhere, such as in Moorend Park Road.

Also road in Cheltenham via The Park, also in Bath Rd.

Rec'd - 7 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and ~~impact on views from Leckhampton Hill.~~

Other comments: Since the closure of A & E department at Cheltenham Hospital, at certain times, ambulances now go to Gloucestrian Hospital (and back). If they are trapped in traffic jambs, as seems inevitable – this could be very dangerous for urgently ill patients.

[redacted]

(d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I ~~/ my family~~ greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I WALK AROUND THE AREA A LOT, EVERY DAY. I WALK MY DOG THROUGH BURROUGHS FIELD, LOTTS MEADOW AND THE FIELDS AROUND CHURCH ROAD. MEETING OTHER PEOPLE WALKING, CHILDREN PLAYING OR PICKING BLACKBERRIES, SHOW HOW THE GREEN SPACES ARE IMPORTANT TO THE HEALTH AND COHESION OF THE COMMUNITY. THIS AREA IS ALSO RICH IN WILDLIFE & TOO PRECIOUS TO LOSE.

- 7 NOV

[redacted]

162 LECKHAMPTON ROAD CHELTENHAM GL53 0DH

[redacted] **Ref: Planning Application 13/01605/OUT**

Name [redacted] 888 CHELTENHAM GL53 0DH

Address FLAT 1, 162 LECKHAMPTON RD

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

✓ (a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

✓ (b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

✓ (c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Road - 7 NOV 2013

(d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I ~~/ my family~~ greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I WALK AROUND THE AREA A LOT, EVERY DAY. I WALK MY DOG THROUGH BURROUGHS FIELD, LOTTS MEADOW AND THE FIELDS AROUND CHURCH ROAD MEETING OTHER PEOPLE WALKING, CHILDREN PLAYING OR PICKING BLACKBERRIES, SHOW HOW THE GREEN SPACES ARE IMPORTANT TO THE HEALTH AND COHESION OF THE COMMUNITY. THIS AREA IS ALSO RICH IN WILDLIFE & TOO PRECIOUS TO LOSE.

Rec'd - 7 NOV 2013

[redacted]
162 LECKHAMPTON ROAD CHELTENHAM GL53 0DH

Nam[redacted] **Ref: Planning Application 13/01605/OUT**

Address 19 THOMASON DRIVE LECKHAMPTON GL53 0PJ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) ✓ Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) ✓ The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

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Road - 7 NOV 2013

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(e) ✓ I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: ...IT...IS...MADNESS...TO...BUILD...IN...LECKHAMPTON...GREEN...SPACES...FOR...ALL...THE...REASONS...SAID...IN...THIS...WHITE...PAPER.....

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Addre[redacted] Page 892

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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Recd - 7 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: THE LOSS OF LOCAL GREEN SPACE WOULD BE A TRAGIC FOR NOT ONLY THE LOCAL COMMUNITY, BUT CHELTENHAM AS A WHOLE

THE PROPOSED MEASURES TO DEAL WITH INCREASED TRAFFIC ARE WHOLLY INADEQUATE & FAIL TO RECOGNISE EXISTING PROBLEMS WITH SUCH DEVELOPMENTS PROCEED, GREATLY WORSENED IF PROPOSED DEVELOPMENTS PROCEED WITH ASSOCIATED TRAFFIC CONGESTION, POLLUTION & DENSITY OF TRAFFIC IN RESIDENTIAL/SCHOOL AREA WITH INCREASED RISK TO PEDESTRIANS, SPECIFICALLY ALONG CHURCH ROAD

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 17 TREELANDS CLOSE CHELTENHAM GL53 0DF

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

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Recd - 7 NOV 2013

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Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ....1 CHARNWOOD RD, CHELTENHAM GL53 0HN.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload ~~and gridlock~~ in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Read - 7 NOV 2013

(d) I am personally affected AND deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: TRAFFIC IS ALREADY EXCESSIVE ON CHURCHYD & ANY INCREASE IS TOTALLY ABSURD. I AM NOT CONVINCED BY THE PROVISION OUTLINED IN THE APPLICATION I'M AMAZED LECK FIELDS IS NOT ALREADY A LOCAL GREEN SPACE. IT IS BEAUTIFUL & ONCE IT'S GONE IT'S GONE FOREVER

Name M[redacted]

Address [redacted] Page 898 **Ref: Planning Application 13/01605/OUT**

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Received
- 7 NOV 2013
ENV

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted]

Address 7 CHARNWOOD CLOSE LECKHAMPTON CHELTENHAM

Ref: Planning Application 13/01605/OUT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rcvd - 7 NOV 2013

ENV

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I would like to agree with all the reasons given to object to the proposed development.

Na[redacted]

Address 344 OLD BATH ROAD CHELTENHAM GL53 9AF **Ref: Planning Application 13/01605/OUT**

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

✓ (a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

✓ (b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

✓ (c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rcvd - 7 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I object strongly - traffic is horrendous now and we do need open fields.

Build in town is my answer and improve derelicted buildings!

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ...116 CAERNARVON ROAD, CHELTENHAM, GLOS

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Recd - 7 NOV 2013
ENVIRONMENT

(d) I am personally ~~affected~~/ deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~I~~/my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: CHELTENHAM AND ITS SURROUNDING AREAS ARE BECOMING FACELESS AS MORE GREENFIELD AREAS ARE ERODED AWAY. A TOWN IS MORE THAN HOMES IT IS GREEN AREAS FOR NATURE TO ENHANCE OUR ENVIRONMENT.

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I totally object to this preposturous application.
The traffic on Shurdington Road is already excessive causing congestion / pollution
The greenfields provide recreational space.

Rec'd - 7 NOV 2013
ENV

Name [redacted]

Address 11 Painswick Rd GL50 2EX

Ref. 13/01605/OUT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I find all this redevelopment plans very difficult to understand.

(1) I think estimated statistics are flawed - overestimated

(2) The amount of traffic is already too heavy without more traffic - the roads can't take it or the air pollution

(3) Employment is not available for the increased population

(4) AONB - Green Belt > All to disappear for ever!

Name [redacted]

Address GL53 9NY

Rec'd - 7 NOV 2013

Ref. 13/01605/OUT

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 5 HALLAND Road, CHELTENHAM, GL53 0DJ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road, which is a popular bicycle commuter route.

- 8 NOV 2013

(d) I am personally affected and deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I and my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: My family and I frequently walk in these fields, and cycle and walk on local roads. Green space is a precious resource for the people of Cheltenham and it should not be squandered.

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address [redacted]010

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) ✓ Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) ✓ The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) ✓ The suggestions made in the application for preventing traffic overload ~~and gridlock~~ in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

- 8 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted]

Address [redacted] WINCHESTER WAY WARDEN HILL CHELTENHAM GL51 3NA

Ref: Planning Application 13/01605/OUT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rcvd - 8 NOV 2013

(d) I am [redacted] / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

Page 918

(e) I / [redacted] value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] Ref: Planning Application 13/01605/OUT

Address 103 CHARLTON LANE CHELTENHAM GL53 9EE

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Post - 8 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: A valued country area would be lost for ever.

Nam[redacted] Ref: Planning Application 13/01605/OUT

Address [redacted] Page 916 RISE GL53 9LH

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

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Recd - 8 NOV 2013
ENV

(d) I ~~am personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

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Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 23 THE LANES, LECKHAMPTON, CHELTENHAM .....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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- 9 NOV

(d) I am personally ~~affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~I~~ / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] .. **Ref: Planning Application 13/01605/OUT**

Address 98a Shurdington Road GL53 0JH

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

[illegible] - 9 NOV [illegible]

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: At the moment it takes sometimes 20 mins to get out of my drive God knows how long if the development takes place. Also how sad if all the small holders lost there living ways of life needs to be replaced

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 114, SALISBURY AVE, LARKHILL SP4 8AY

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rcvd - 8 NOV 2013

(d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: THE THINGS THAT BOTHER ME ARE THE FLOODING THAT MAY HAPPEN & FOOT PATHS.

Name ... [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ..FLAT 21 WATERFORD COURT MOOREND PARK RD GL53 0LA.

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd - 8 NOV 2013

(d) I ~~am personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I ~~/ my family~~ greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: ....We would become part of a wider urban ..... Sprawl if plan goes ahead. Traffic is bad in this area it takes up to an hour to travel to Gloucester; bus 46 and bus 10 would need to be added on, Shops, doctors, Schools would be needed. There are no jobs of note in this area So people would Spend ~~all day~~ a long time travelling between Cheltenham & Glos. The area would be damaged & polluted. A lot of older people live here & they wld not be able to get out and about. Risk of flooding would become more evident. It rains a lot here!

Name [redacted] Page 926 **Ref: Planning Application 13/01605/OUT**

Address 5 David French Court, Cheltenham, GL51 3BQ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Road - 8 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Huge concerns over School places for our children. I assume existing families can not be guaranteed and so, do not believe it is fair that places may be lost to others moving to the area.

Huge concerns over flooding also, as well as risk of accidents & pollution!

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address THE BUNGALOW, 26B MOOREND PARK ROAD, CHELTENHAM

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work ~~they will~~ cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd - 8 NOV 2013

ENV

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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[redacted]

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Page 932

Address GLENARAY, SHURDINGTON ROAD, CHELTENHAM GL53 0NJ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

- 8 NOV 2013

ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / ~~my~~ family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] **Planning Application 13/01605/OUT**

Address 14a Winchester Way Cheltenham

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) ~~Given the evidence from the 2011 census and ONS projections on future housing need in~~ Cheltenham, this proposed development is unnecessary. The application is premature and must not be ~~permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.~~

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and ~~gridlock~~ in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

[illegible] 5 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

~~(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.~~

Other comments: As a cyclist I see journies more problematic especially during winter early mornings and late afternoons if this development is approved.

[redacted]

4-11-13

NOV 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I have lived in Cheltenham since 1968 - first in Moorend Park Road and since 1995 on Leckhampton Road and have witnessed at first hand the increase of traffic volume in both these areas, the Shurdington Road and Church Road. The latter is dreadful from about 7-9am to 9.30am, and 4.30pm to 6.30pm, with a constant stream of traffic. I really believe that those who wish to build on land abutting onto either Shurdington Road, Church Road and Leckhampton/Bath Roads, have never actually visited the area during the busy times. Yes - people need AFFORDABLE housing, but deserve a decent support system too. The existing infra-structure is already stressed.

Name [redacted]

Address 132 Leckhampton Road, Cheltenham. GL53 0BX

Ref. 13/01605/OUT

13/01605/OUT

Land at Leckhampton

Representations

Batch 6

Nam[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address BRYNHYFRYD. FARM LA[illegible]HAMPTON. CHELTENHAM.

(include, delete or modify the following statements as appropriate)

BUILT
Recd 11 NOV 2013

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Have these plannes taken into account the ground around here that gets well & truly water logged. Since they built these houses at the back of my garden - the end of the garden is like a bog when it rains & it can only get worse with more & more concrete, & the traffic is already pretty horrendous up Farm Lane.

Nam[redacted] .... **Ref: Planning Application 13/01605/OUT**

Address 27 Warren Close Cheltenham GL51 3HW

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload ~~and gridlock~~ in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd - 8 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Nar[redacted] Ref: Planning Application 13/01605/OUT

Address 58 ALMA ROAD, CHELTENHAM, GL51 3NB

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

NOV 2013

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) ~~I am personally affected /~~ deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

THOUGHT OUR "GREEN BELT" WAS SUPPOSED TO BE PROTECTED!!

It is very important to respond on the proposed development. You can use this tear off slip if you wish

Name [redacted] le 944 **Ref: Planning Application 13/01605/OUT**

Address 65a Moorend Crescent, Cheltenham GL53 0EW

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

11 NOV 2013

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

It is very important to respond on the proposed development. You can use this tear off slip if you wish

(d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: See JCS consultation — comments applicable here, too. Make our lives stressful, noisy and polluted and ugly — MW.

Build, build, build etc, etc, until our green and pleasant land isn't either of these things. How did we allow the fate of our environment to fall in to such greedy, grasping hands? So sad.

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ...19....TREELANDS CLOSE....., ...LECKHAMPTON.....

(include, delete or modify the following statements as appropriate)

NOV 2013

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

I agree with all these points.

The roads are going to be horrific with extra traffic.

Nam[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 28 DURHAM CLOSE WHITEN HILL CHELT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

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(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] Planning Application 13/01605/OUT

Address 92 FARMFIELD ROAD, WARREN HILL, CHELTENHAM GL51 3RA

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

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NOV 2013

(d) I am personally affected / ~~deeply concerned~~ by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I/ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name .... [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ..... 62 CANTERBURY WALK, WARDEN HILL .....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

11 NOV 2013

(d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~I~~ / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 6 ST ALBANS CLOSE LARDEN HILL CHELTENHAM GL51 3DJ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a)✓ Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) ✓ The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name ..[redacted]..... **Ref: Planning Application 13/01605/OUT**

Address .....16 Tensing Rd Cheltenham GL53 9LX.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

11 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ....49 Church Road, Leckhampton, Cheltenham

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd 11 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ☑ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 12 TAYBERRY GROVE, GL51 3NF.

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd 11 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: The local infrastructure cannot support so many extra houses. There are still vacant plots on the new build site opposite Badgeworth livery stables, clearly demonstrating the need for local housing is not great. Surely brownfield sites such as the ex Christ college site are far more appropriate for building.

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 21 MERLIN WAY, LECKHAMPTON CHELT GL53 0LT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

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Rec'd 11 NOV 2013

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(e) I greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 11, THE LANES, LECKHAMPTON, CHELTENHAM GL53 0PU

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

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Rec'd 11 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) My family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Please re-examine the situation — join the queues on the Shurdington Rd and along Church Road. Try and book an appointment for medical attention at the Leckhampton Surgery THEN imagine what life in the surrounding area will be like with over 1075 new inhabitants!! How can you expect anyone to agree with this propopsal

Na[redacted] **nning Application 13/01605/OUT**

Address 95 Pilley Crescent Page 2665 9ES

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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11 NOV 2013

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Other comments: .....

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Name [redacted]

Address [redacted] Page 968 **Ref: Planning Application 13/01605/OUT**

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

[redacted] 11 NOV 2013

(d) WE ARE ~~I am~~ personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

Name [redacted]

Address [redacted] **Ref: Planning Application 13/01605/OUT**

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(d) I am ~~personally affected /~~ deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~I /~~ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ..DERRYNARBOR, Page 972 LEACHAMPTON HILL, CHELTENHAM GL53 9QG

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

✓ (a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

✓ (b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

✓ (c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd 11 NOV 2013

✓ (d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

✓ (e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: When accidents occur (as they occasionally do) on the A46 / Crickley Hill, traffic has to be diverted down Leckhampton Hill. This causes gridlock at peak times and the extra cars from new development would exacerbate the problem.

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Please see enclosed

RECEIVED
11 NOV 2013

Name [redacted]

Ref. 13/01605/OUT

Address 49 Church Rd Cheltenham GL53 0PF

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ....49 Church Road, Prestbury, Cheltenham

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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Rec'd 11 NOV 2013

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Other comments: .....

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PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

1. TRAFFIC PROBLEMS A MAJOR CONCERN
2. HEALTH of RESIDENTS PLACED in JEOPARDY from POLLUTION (ALREADY ABOVE THE ACCEPTED NORMS)
3. DANGER of OVERLOAD on PUBLIC SERVICES

RECEIVED
11 NOV 2013

Name [redacted] Ref. 13/01605/OUT

Address 26 MOORENDS ST, CHELTENHAM GL53 0EH

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

1) This application is premature and (if it is to proceed at all) should not be considered before the Joint Core Strategy is complete.

2) The area cannot cope with the existing traffic levels and adding 1,000 extra vehicles will lead to complete gridlock in working hours.

3) Air pollution will increase unacceptably.

NOV 2013

Name [redacted] Ref. 13/01605/OUT

Address 83 MOORLAND RD, CHELTENHAM GL53 0HB

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

- I do not wish to lose green belt land in this area, the loss of green land with implication for loss of farm animals and wild life that is a pleasure to see.
- I do not believe the local road system can deal with road closures while work undertaken, or with extra traffic on traffic already at a standstill at peak times. Alongside this are implications for increased local pollution, increased accidents and increased journey times.
- It is not clear that local infrastructure able to cope with increased capacity - Schools, local medical and emergency services (Surgeries/hospitals). Many of those local services already working beyond sensible capacity.

Name [redacted]

Address 5 Malin Drive, Up Hatherley

Ref: 13/01605/OUT

Name [redacted] **Planning Application 13/01605/OUT**

Address ....114 CHARLTON Page 980 CHELTENHAM GL 53 9EA

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

See attached

Planning Application Leckhampton Fields ref 13/01605/OUT

This is a quite extraordinary situation. It is obvious why the builders want to proceed asap but why are the JCS people so keen to start before the facts are established and any necessary infrastructure put in place? Do they have a secret agenda?

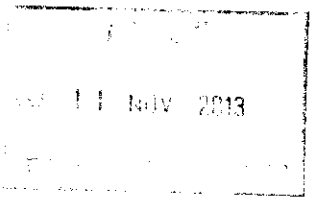
Numbers of Houses
The number of properties for the area must be clearly established and as many as possible built on brown field sites. We do not need to plan for all houses up to 2031 which is 17 years away; forecasts should be updated gradually over time.

Traffic
CBC traffic people have never been very effective and not having a detailed plan to deal with the situation is par for the course but totally unacceptable. Church Road where residents have to park on the road is already impassable at times and can only get worse.

Schools
School requirements for all ages must be realistically assessed and the schools themselves built as the houses are built. Children need schools from day1 and to leave them without school places is illegal.

Flooding
Difficult to assess but it does seem to occur more frequently. Developers must be required to pay for an insurance bond to cover flooding claims over the next 20+ years. If they are required to put their money where their mouth is then flood prevention schemes are much more likely to work.

Anthony Melville Smith 114 Charlton Lane, Cheltenham GL53 9EA



05 NOV 2013
ENVIRONMENT

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 8 ROCHESTER CLOSE CHELTENHAM GL51 3DJ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

The traffic is a great concern on the A46 as a trunk road and its present accident level & the congestion in Bath Road due to the A46 and the Leckhampton Road meeting at the Norwood Arms roundabout.

As a walker with 'Walking For Health Group' using the open space footpaths & enjoying the wild life in the surrounding area, also the views of Leckhampton Hill.

I object to these Proposed development

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address HAZELWELL, UNDERCLIFFE TCE, CHELTENHAM, GL53 9AE

(include, delete or modify the following statements as appropriate)

Rec'd 12 NOV 2013

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I & my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

The traffic congestion in the morning on the A46 already makes it very difficult to get to appointments etc. on time. I think businesses will move out of Cheltenham if people cannot get to work. I personally value the green spaces, trees & wildlife around Leckhampton & feel there is already too much building in beautiful countryside.

Nam[redacted] ... **Ref: Planning Application 13/01605/OUT**

Address ...19...CHURCH.....ROAD.....LECKHAMPTON.....

BUILT

12 NOV 2013

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Church Rd is already at a standstill for several hours every day. The pollution is a health-hazard as the cars are only feet away from our doors & windows.

The greenbelt is essential and can not be un-built on once lost.

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 9 Rochester Close Warden Hill Cheltenham GL51 3DJ

(include, delete or modify the following statements as appropriate)

BUILT
Rec'd 12 NOV 2013
ENVIRONMENT

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / ~~my~~ family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: We live in an area surrounded by Hills. Green fields are the lungs of Cheltenham. The A46 is a nightmare to all wanting to travel either towards or away from the area. We must keep this road traffic flowing especially as it is a direct route for emergency services, ie. Hospital / Fire Service. The flood defence on Bournside Area and Beeches field has not alleviated the surface water already in November making adjacent fields, ditches and streams at full flood level and its only the beginning of winter. These proposals are totally unacceptable.

It is very important to respond on the proposed development. You can use this tear off slip if you wish

Nam[redacted]. **Ref: Planning Application 13/01605/OUT**

Address 21 Lincoln Ave; Warden Hill, Cheltenham GL51 3DD

(include, delete or modify the following statements as appropriate)

12 NOV 2013

I wish to object to the proposed development on the following grounds:

(a)✓ Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b)✓ The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c)✓ The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

It is very important to respond on the proposed development. You can use this tear off slip if you wish

(d)✓ I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ✓ I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments:

Affordable housing should be a priority - but should be built not on greenfield sites but on some of the large closed-down buildings in the town centre. Such sites already have water, power supplies and drainage facilities; and are something of an eyesore in their present run-down state. Knock these buildings down and build on the sites. Also; the threat of flooding into Warden Hill is a critical factor.

Name [redacted] Ref: Planning Application 13/01605/OUT

Address 30 HILLARY ROAD LEckhampton GL53 9LD

12 NOV 2013

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: NO INFRASTRUCTOR - NO PLANNING PERMISSION = SURELY!!

Name ..... [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 2[redacted] MERLIN WAY LECKHAMPTON

(include, delete or modify the following statements as appropriate)

12 NOV 2013

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 2 TENSING ROAD CHELTENHAM GL53 9LX

(include, delete or modify the following statements as appropriate)

Rec'd 12 NOV 2013

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / ~~my family~~ greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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[redacted]

Name [redacted]

Address 24 MOOREND GROVE - CHELTENHAM - GL53 0HA

Ref: Planning Application 13/01605/OUT

(include, delete or modify the following statements as appropriate)

Rec'd 12 NOV 2013

I wish to object to the proposed development on the following grounds:

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(d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / ~~my family~~ greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I wish to object to these proposed developments on the above grounds,

[redacted]

Ticked where I personally am chiefly concerned.

Nam[redacted]

Address 52 SHURDINGTON Road CHELTENHAM GL53 0JD **Ref: Planning Application 13/01605/OUT**

(include, delete or modify the following statements as appropriate)

BUILT
Recd 11 NOV 2013
ENVIRONMENT

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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Other comments: .....

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Name [redacted]

Address ..... PINERIES Page 1002 CLOSE ..... LECKHAMPTON .....

Ref: Planning Application 13/01605/OUT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

PUT
12 NOV 2013
ENV

✓ (a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

✓ (b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

✓ (c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / ~~my family~~ greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Planning permission for the development upon the green fields of Leckhampton have many times been rejected in the last 20 years. Why is it that the reasons for these rejections suddenly have become redundant. The same problems still exist. Are they to be ignored?

Name [redacted] **Planning Application 13/01605/OUT**

Address 343 Old Bath Road GL53 9AH

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

RECEIVED 12 NOV 2013

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(e) ~~I / my family greatly value the Leckhampton fields for recreation.~~ I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I understand there is a risk of flooding, despite the developers' drainage plan

Na[redacted]f: Planning Application 13/01605/OUT

Address 351 OLD BATH ROAD, CHELTENHAM, GL53 9AJ.

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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[illegible] 13 NOV [illegible]

(d) I am personally ~~affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Traffic congestion will be intolerable. It's bad now!
There are no schools with capacity to cater for new residents without bussing pupils miles away to other schools - more traffic!!
The area is a haven for wildlife such as deer, hares, voles rabbits, grass snakes, birds, owls, insects and butterflies, all of which we have seen in the area
If there is no home for native, THERE WILL BE NO NATURE!

Name [redacted] ... **Ref: Planning Application 13/01605/OUT**

Address ...146 Farmfield Rd, Warden Hill.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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13 NOV 2013

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Other comments: .....

the town centres of Cheltenham/ Gloucester/Tewkesbury etc should be developed instead of building on green belt land

Name .... [redacted] **Ref: Planning Application 13/01605/OUT**

Address .....155....SALISBURY....AVE....CHELTENHAM.....GL51 3DS...

(include, delete or modify the following statements as appropriate)

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12 NOV 2013

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Other comments: .....

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Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 25 Woodlands Road Cheltenham

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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13 NOV 2013

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Other comments: .....

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Na[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 5 THE LANES, CHELTENHAM, GLOS GL53 0PU

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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13 NOV 2013

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(e) I / ~~my family~~ greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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[redacted]

Nam[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ..38.....NORWICH.....DRIVE.....GL513HE.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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Rcvd 13 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I/ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I HAVE RECENTLY COUGHED CONTINUALLY FOR 2 MONTHS, MY 3RD EPISODE OF COUGHING IN 16 MONTHS OF LIVING HERE. THE ONLY WAY TO GET TO LECKHAMPTON SURGERY IS ALONG THE SHURDINGTON RD., EITHER WALKING OR BY CAR, (EXCEPT WALKING UP SALISBURY AVENUE & THROUGH TO THE PARK VIA FOOT & CYCLE PATH — TOO FAR FOR MOST IN WARDEN HILL!) POLLUTION AFFECTS DRIVERS MORE THAN PEDESTRIANS! ("TRUST ME I'M A DOCTOR" BBC 1.)

Nar [redacted] **Ref: Planning Application 13/01605/OUT**

Address 109 Pittville Road, Cheltenham GL50 2RX

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

1 NOV 2013

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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To Cheltenham Council Planning Dept, Municipal Offices

(d) I am personally affected / ~~deeply concerned~~ by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I AM REALLY WORRIED ON THE EFFECT OF THE HEALTH OF ME & MY FAMILY RE THE POLLUTION / PARTICULATES IN OUR LUNGS FROM EXHAUST OF SO MANY LORRIES VANS & CARS ON A46. BY MY HOME.

MUNICIPAL OFFICE
12 NOV 2013
COUNTER

K:47.

Nam[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address KERSEY The REAR BUNGALOW 48 SHURDINGTON RD. GL53 0JE

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

12 NOV 2013

(d) I am personally affected / ~~deeply concerned~~ by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / ~~my family~~ greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: One of the very important things of living in Cheltenham is the easy access to the countryside that is fast disappearing under more & more buildings

Name [redacted] Ref: Planning Application 13/01605/OUT

Address 62 Moorend Park Road, Cheltenham, GL53 0JY

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload ~~and gridlock~~ in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd 12 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: This application is ludicrous! Traffic levels are already at an all time high. Air pollution is unacceptable and school places are hard to come by. The local residents value the green fields greatly. Walks, views, wildlife and give us so much pleasure and are part of the charm of Leckhampton. Where will all the surface water go?? Please don't make us a concrete jungle. This is not needed or wanted. Listen to the residents!!

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ..... Page 1024 ..... GL51 3DN

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: When I moved here in 1961 I had views to Leckhampton Hill. Now I cannot see the hills due to nearby building and am homebound.

Name [redacted] 1026 **Ref: Planning Application 13/01605/OUT**

Address 10A FLAT 162 LECKHAMPTON RD CHELTENHAM GL53 0DH

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I AM 86 AND VERY WORRIED ABOUT CROSSING THE ROAD TO THE SHOP IF IT GETS BUSIER - I FIND IT DIFFICULT NOW

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 325 OLD BATH RD. CHELTENHAM GL53 9AJ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

✓ (d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

✓ (e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address [redacted], LECKHAMPTON, CHELTENHAM, GLOS GLS3 0JJ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) ✓ Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) ✓ The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) ✓ The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Recd 13 NOV 2013

(d) ✓ I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ✓ I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted]

Ref: Planning Application 13/01605/OUT

Address [redacted] LECKHAMPTON GL53 0HE

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted]

Ref: Planning Application 13/01605/OUT

Address S. Hampton Close, Leckhampton, Cheltenham GL51 3DZ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

[illegible] 13 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address HOLLY LODGE, CHURCH RD, LECKHAMPTON: GL53 ØRS

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I can't believe the irresponsible and ridiculous action this JCS contains. Results of estimations can't be trusted just an excuse to bring in money, understandable but just doesn't have to be done this way!! If you need more housing, look at existing developments that are empty and set developers/councils to invest in refurb of these!! Use your heads, your hearts and not wallets!

Nam[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ...5 WESTSIDE PARK, THE REDDINGS, CHELTENHAM, GL51 6RT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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1[illegible] NOV 2013

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Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 9 NURSE CLOSE, CHELTENHAM, GL53 0NQ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

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13 NOV 2013
PLANNING SERVICES

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Nam[redacted] **Ref: Planning Application 13/01605/OUT**

Address 54 CARNARVON ROAD, CHELTENHAM, GLOS, GL51 8JP

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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[illegible] 1[illegible] NOV 2013

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Other comments: .....

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Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 54 CAERNARVON Road, CHELTENHAM GL51 3JP

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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Other comments: .....

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Name [redacted] **Planning Application 13/01605/OUT**

Address 54 CAERNARVON RD CHELTENHAM GL51 7JP

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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Read

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Other comments: .....

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Name ..[redacted]..... **Ref: Planning Application 13/01605/OUT**

Address .....1) SELWORTHY, UP HATHERLEY, CHELTENHAM, GLOS GL51 3YA

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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Recd 13 NOV 2013
ENVIRONMENT

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Other comments: .....

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Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 5 Westside Flats, The Reddings, Cheltenham, GL51 6RT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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13 NOV 2013

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Other comments: .....

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Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 9 Nurse Close, Cheltenham, GL53 0NQ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Date 11 NOV 2013

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

Page 1053

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Traffic congestion will be intolerable. It is bad now.
Insufficient schools for future capacity. This could
involve transporting pupils to other schools causing
more traffic chaos.
The risk of flooding is very real, especially with
global warming getting worse.
Leckhampton fields should be protected as a
local GREEN SPACE of special community value
to existing residents of Cheltenham.
If there is no home for nature, there will be no nature.

Name [redacted] Ref. 13/01605/OUT

Address 331 Old Bath Road
Cheltenham GL53 9RJ.

12 NOV 2013

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 11 Hall Road, Cheltenham Page 1053 OHE3 .....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

✓ (a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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✓ (c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

BUILT
Recd 14 NOV 2013
ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) My family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: The quantity of houses proposed is way too high for the area to sustain. Traffic would be intolerable and hazardous and impact on the environment. There are insufficient secondary school places in Leckhampton already. How can this not be seen as a problem with another primary school?

Ref: Planning Application 13/01605/OUT

Name [redacted] age 105 Hill, CHELTENHAM

Address 18 OXFORD WAY, BISHOPS CLEEVE

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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BUILT
Recd 14 NOV 2013
ENVIRONMENT

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Other comments: .....

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Ref: Planning Application 13/01605/OUT

Name [redacted] GL51 3RT

Address 49 Salisbury Avenue Cheltenham

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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BUILT ENVIRONMENT Rcvd 14 NOV 2013

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Other comments: ....My husband & I regularly walk along Charlgrove Lane for exercise, when some foot paths & fields are too muddy or unsuitable for walking. We see numerous walkers with pushchairs, wheel chairs & dogs doing the same thing. There is very little traffic & is a reasonably safe place to exercise in the country with beautiful views. It is health promoting to walk in pollution free areas & should not be denied to a large number of people

Nam [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 14 NORWICH DRIVE, WARDEN HILL, CHELTENHAM, GLOUCESTERSHIRE GL51 3HE

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

1 NOV 2013

(d) I am personally affected AND deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I ~~/ my~~ family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I PAID A LOT OF MONEY FOR MY HOUSE IN WARDEN HILL; SO I DON'T WANT THE QUALITY OF MY ENVIRONMENT, AND THE VALUE OF MY PROPERTY, TO BE LOWERED BY SPRAWLING URBANISATION, TRAFFIC CONGESTION, THE DESTRUCTION OF THE LANDSCAPE AND WILDLIFE'S NATURAL HABITAT, AND THE INCREASED DANGER OF MORE FLOODING IN AN AREA THAT WAS DELUGED ONLY SIX YEARS AGO.

[redacted] 3/11/2013

Name [redacted] Ref: Planning Application 13/01605/OUT

Address 31 HILLAR[redacted] ROAD Page 1063 9LB

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

BUILT
Rcvd 14 NOV 2013
ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and a[redacted]ident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation, [redacted] strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as [redacted] Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on view[redacted]s from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 24, GIFFARD WAY, LECKHAMPTON, GL53 0PP.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

BCKLL
Recd 14 NOV 2013
ENVIRONMENT

AND

(d) I am personally affected ~~&~~ deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I AM ALSO CONCERNED THAT THIS SCHEME WILL FURTHER INCREASE THE ALREADY HIGH RISK OF FLOODING.

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 34 CAMPION PARK, UP HATHERLEY, CHELTENHAM GL51 3QN

BUILT ENVIRONMENT
Recd 14 NOV 2013

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems. See comment later.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Any further developments will end with Cheltenham joining with Gloucester to form an overcrowded, sprawling conurbation. Please leave some beauty in our environment and use up ugly areas, grey areas for redevelopment which will enhance rather than destroy.

Ref: Planning Application 13/01605/OUT

Nam[redacted]

Page 1069

Address 9 CANTERBURY WALK, GL51 3HQ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

BUILT
Recd 14 NOV 2013
ENVIRONMENT

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Other comments: .....

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Ref: Planning Application 13/01605/OUT

Name [redacted]

Address 11 NOURSE CLOSE CHELTENHAM GL51 0NQ

Page 10713

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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BUILT
Rcvd 14 NOV 2013
ENVIRONMENT

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(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I was employed by the C.E.G.B in their Design and Construction Division at Barnwood, Gloucester. I know that the margin between generated power and demand is very small. Should one or more 2000 MW power station go off load than this could cause a grid trip and a national power failure resulting in loss of electricity, water and gas. Building the houses proposed by Planning Application 13/01605/OUT adding to all other extra houses in the country will be detrimental for the whole country. The proposed development is also a very large flood risk

Ref: Planning Application 13/01605/OUT

Name [redacted] Page 1073

Address 80 SHURDINGTON CHELTENHAM

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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BUILT
Recd 14 NOV 2013
ENVIRONMENT

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(e) ✓ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name ..[redacted] ..... Ref: Planning Application 13/01605/OUT

Address ....372, OLD BATH R3, CHELTENHAM GL53 9AD.

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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BUILT
Recd 14 NOV 2013
ENVIRONMENT

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Other comments: .....

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Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 15 THE PARK CHELTENHAM GL50 2SL

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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Cotswold District Council - Post Room
Attn Of | Initials | Date Rec'd
14 NOV 2013

BUILT
Recd 14 NOV 2013
ENVIRONMENT

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Other comments: .....

POLLUTION + ENORMOUS TRAFFIC BUILD UP IS A MAJOR CONCERN

THE JCS MUST LOOK AT THE REQUIREMENTS IN HOUSING AGAIN

Name [redacted] re planning application [redacted]

Address 7, KENELM GARDENS, CHELTENHAM. GLOS GL53 0JW

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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BUILT
Rec'd 15 NOV 2013
ENVIRONMENT

by the developers showed very [illegible]

Over 94% of people were opposed or strongly opposed to the proposed development.

It is very important to respond on the proposed development. You can use this tear off slip if you wish

✓ (d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

✓ (e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: THE OVER ESTIMATION OF FUTURE HOUSING NEEDS AND THE INCREASED TRAFFIC FLOW WILL CAUSE IMPOSSIBLE PROBLEMS FOR TRAFFIC MOVEMENT IN THE AREA

I AM APPALLED THAT DESPITE MEETINGS OVER THE YEARS, THIS SUBMISSION IS STILL BEING PERSUED - THE TRAFFIC DENSITY IS ALREADY TOO HIGH AS WE LIVE ON THE A46, ANY INCREASE WILL MAKE LIFE UNBEARABLE

Name [redacted] ... **Ref: Planning Application 13/01605/OUT**

Address 14, Chatsworth Driveway, Cheltenham.

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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BUILT
Recd 15 NOV 2013
ENVIRONMENT

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Other comments: On occasions when there has been extra traffic through the area due to road closures the queues have been horrendous & the traffic on Church Rd / Leckhampton Rd was grid locked. There is simply no extra capacity in the road system. This is a residential area that will suffer greatly if the proposal goes ahead.

Name [redacted] lanning Application 13/01605/OUT

Address 1 JAPONICA DRIVE, UPPER LEY, CHELT GL51 3WD

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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BUILT
Recd 15 NOV 2013
ENVIRONMENT

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Other comments: .....

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Nam[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 5 BRIZEN LANE, LECKHAMPTON GLS3 ONG

Page 1085

(include, delete or modify the following statements as appropriate)

BUILT
Recd 15 NOV 2013
ENVIRONMENT

I wish to object to the proposed development on the following grounds:

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Other comments: .....

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Ref: Planning Application 13/01605/OUT

Name [redacted]

Address 15 SHORT STREET, CHELTENHAM GL53 0DY

(include, delete or modify the following statements as appropriate)

Page 1097

BUILT ENVIRONMENT
Recd 15 NOV 2013

I wish to object to the proposed development on the following grounds:

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(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: AS A PARENT THE LACK OF FORESIGHT ABOUT SCHOOL PROVISION SHOCKS ME. WHERE ARE THE NEW RESIDENTS CHILDREN TO BE EDUCATED?
BRITAINS POPULATION IS LIKELY TO SHRINK IN THE COMING DECADES IF IMMIGRATION IS CURTAILED AS PLANNED SO WHY SO MANY NEW HOUSES?

Na[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Page 1089

Address ..HAMBOUR, FARM LANE, LEckhampton, CHELTENHAM.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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BUILT
Recd 15 NOV 2013
ENVIRONMENT

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Other comments: WHERE ARE THE LOCAL JOBS TO SUSTAIN THIS No OF HOUSES. EVERY BODY WILL HAVE TO TRAVEL VIA THE SHURDINGTON Rd A46. WHICH IS FULL TO CAPACITY NOW.

A TRAFFIC THROUGH NEW DEVELOPMENT IS CRAZY BUT STILL HAS TO GO ONTO THE A46 GRID LOCK

BUILT
Recd 15 NOV 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I am very concerned about the impact of this proposed development on the transport network in this area of Cheltenham. The A46 is already very busy during the morning and evening rush hour, and cannot take any additional vehicles. In addition Church Road is becoming more dangerous because of the number of cars trying to pass vehicles parked on the road. It is simply too dangerous to allow the cars from 650 additional houses to be added to this situation. This application must be postponed until the JCS for the area has been finalised and the associated transport and population estimates have been verified.

Name [redacted] Ref. 13/01605/OUT

Address 2 HALLAND ROAD, CHELTENHAM GL53 0DJ

BUILT
Rec'd 15 NOV 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I am very concened by the proposed development because of the impact on air quality in the leckhampton area of Cheltenham. I understand that pollution already exceeds EU maximum levels on Church Road and Shurdington Road during the winter months. The additional vehicles from this development will damage the health of the local population. This proposed development should only be considered by the planning committee once the ~~Local Plan~~ JCS has been finalised so that transport estimates can be carefully considered with all the other relevant information.

Name [redacted] Ref. 13/01605/OUT

Address 2 HALLAND ROAD CHELTENHAM GL53 0DJ

13/01605/OUT

Land at Leckhampton

Representations

Batch 7

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address .....22 TREELANDS CLOSE GL53 0DF.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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BUILT
Recd 18 NOV 2013
ENVIRONMENT

(d) I am personally ~~affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my ~~family~~ greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 124, FARMFIELD ROAD, WARDEN HILL CHELT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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BUILT
Recd 18 NOV 2013
ENVIRONMENT

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(e) \/ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 12 FRAMPTON MEWS, THE REDDINGS, CHELTENHAM GL51 6UG

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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BUILT
Recd 18 NOV 2013
ENVIRONMENT

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(e) I/ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ....129 Lechham Page 1100 Cheltenham GL53 0AD

(include, delete or modify the following statements as appropriate)

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(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

BUILT
Recd 18 NOV 2013
ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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[redacted]

Nam[redacted] **Ref: Planning Application 13/01605/OUT**

Address ...2 KENELM GARDENS, GL53 0JW.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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Other comments:

We live in Kenelm Gardens. Our daughter and her 3 young children live opposite us at 80 Shurdington Road, (on the other side of the A46). It takes forever to cross the road now. It is dangerous, particularly at rush hour. What will the danger level be like should the scheme go ahead?

[redacted]

[redacted]

[redacted]

ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the currently proposed developments.

(e) I am deeply concerned over future schooling and the danger that the proposed developments will leave my / many children without local schools.

Other comments: I can't see where the new Schools required would be built — I'm thinking about Secondary as well as primary provision

The traffic is a problem now, add to it and the consequences don't bear thinking about.

Nam[redacted] **Ref: Planning Application 13/01605/OUT**

Address WHITEBEAM COTTAGE, LECKHAMPTON LANE, SHURDINGTON GL51 4XW

(include, delete or modify the following statements as appropriate)

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Recd 18 NOV 2013
ENVIRONMENT

(d) I am personally affected / ~~deeply concerned~~ by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ☑ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Beautiful landscape — there for all
Many brown field sites are available
surely they should be used first?

Nam[redacted]

Address 28 Treelands Drive, Leckhampton, Cheltenham GL53 0DE

Ref: Planning Application 13/01605/OUT

(include, delete or modify the following statements as appropriate)

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BUILT
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ENVIRONMENT

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Other comments: Every Town Council is trying to encourage cycling, but it seems that zero provision has been made to provide safe passage for cyclists if this preposterous scheme goes ahead. I would respectfully suggest that a few Councillors try cycling on the A46 in rush hour and likewise in Church Road — and this is before any additional homes are built.

14/11/13

[redacted]

Name [redacted]

Address [redacted] **Ref: Planning Application 13/01605/OUT**

(include, delete or modify the following statements as appropriate)

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BUILT
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It is very important to respond on the proposed development

(d) I am personally affected and deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

Page 1111

(e) I and my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: We do not feel that decisions have been made democratically with due reference to local feeling. Public surveys conducted by Leckhampton/Warden Hill parishes show 94% people were opposed to proposals.

Name ..A cynical & disillioned. **Ref: Planning Application 13/01605/OUT**

Address ..resident.. from Everest Road. 16/11/2013

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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Other comments: I fully endorse all the comments made by the Leckhampton & Warden Hill Parish Council against the planned/proposed housing developments in the areas of Leckhampton — it is pure vandalism.

I wish you luck in your protest but as it is politically motivated I fear you are wasting your valuable time as the Planning Council just rides

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(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the currently proposed developments.

(e) I am deeply concerned over future schooling and the danger that the proposed developments will leave my / many children without local schools.

Other comments: rough shod over local opinions & objections. I suspect there are very lucrative negotiations to be obtained from these dealings.

My own experience is based on the very recent granting of planning application which has been given to 1A Everest Road Leckhampton to turn a small 2 bedroom bungalow into a day nursery for 16 children. Now awaiting for the first accident to happen, but good luck in your endeavours.

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 17 LIDDINGTON CLOSE, LECKHAMPTON, CHELTENHAM GL53 0AH

(include, delete or modify the following statements as appropriate)

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BUILT
Recd 19 NOV 2013
ENVIRONMENT

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Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

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19 NOV 2013
ENVIRONMENT

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Other comments: .....

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PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

(1) Given ONS projections on future housing need, this development is unnecessary

(2) The traffic congestion caused by this development and the other proposed developments would be horrendous.

(3) I value the Leckhampton Green Fields for recreation. It should be preserved as an open green space

BUILT
19 NOV 2013
ENVIRONME

Name [redacted] Ref. 13/01605/OUT

Address 15 JAMCA DRIVE
CHELTENHAM GL51 3WD.

To: [redacted]
CBC Planning, Municipal Offices, Cheltenham.
JCS Team, Municipal Offices, Cheltenham.

Comments & Observations on 650 House Application on Leckhampton Green Fields
Comments & Observations on the Joint Core Strategy, 33,000 houses to 2031

A46 Air Quality
The surge in popularity of cycling is evident on the A46 Shurdington road. Also prominent are the joggers. These "green" minority road users are increasing and their vulnerability places an obligation on planners. Moderate to strenuous exercise requires an abundance of unpolluted air and in heavy traffic this is increasingly scarce. At slow traffic speeds a cyclist is trapped in air that is of poorer quality than that typically monitored at the roadside. The deterioration of air quality along the A46 corridor is already of concern; additional vehicles channelled into theA46 can only aggravate the problem. The policy of developing green fields is abhorrent but when it may be at the expense of jeopardising the health of those who are contributing most in reducing pollution it appears criminal. There is no alternative route for cyclists.

Mr Pat Alexander has already been told (Meeting of Special Meeting (Joint Core Strategy), Council, Thursday, 5th September, 2013 2.30 pm (Item 8):
"The Local Transport Plan requires developers to assess the impact of their proposals in terms of air quality and noise, and to mitigate any anticipated effects. There is no evidence (a) that atmospheric pollution from development in this area will breach national thresholds or (b) that any atmospheric pollution potentially arising that may breach national thresholds cannot be mitigated".

This reply from a Cabinet Member should be a warning that unless pollution is treated seriously an environmental catastrophe awaits. Leaving aside the ambiguity of "no evidence" (the public would prefer positive evidence that there is no risk to health) the statements validity is restricted to local developments. Local pollution levels are a synergy of diverse factors, many beyond the local area and therefore control that are difficult to quantify and as a result pollution levels are more likely to increase. It is disingenuous to state that local housing development will not increase pollution levels as many developers would like to claim; how on earth does pollution arise in the first place if not from a myriad of "local" developments? Neither is it clear if the pollution from developments includes that generated through the associated vehicles, concentrated into a confined corridor that is already obnoxious at times.
The Leader's postponement to answering Mr Alexanders supplementary question on how part (b) might be implemented is understandable. The answer will be awaited eagerly in in many areas suffering the same plight. The data providing this "no evidence" for part (a) and (b) hopefully will be available for scrutiny.

As part (a) is poorly defined perhaps evidence that is crucial to the debate could be provided? The pollution along the A46 Shurdington road is the cumulative contribution from all proposed JCS local developments on top of that from outside the JCS area. The effect of traffic congestion at peak hours and race meetings are probably well researched and there is a wealth of data on the effect of pollution on cancers, respiratory and heart problems. The reply to Mr Alexander's question indicates a worrying sense of a lack of expertise being brought to bear on a serious health issue. Air quality should be measure in still air conditions at peak traffic at near standstill at the position where air is inhaled. Residents along the roadside have a different problem with longer terms of exposure at reduced concentration which will require a different assessment. Where there are health issues the public need assurance from the environmental health department and not from a property developer.

It is up to the JCS architects to ensure there is sufficient slack to absorb stresses from regional changes and not just parochial developments; contingency plans need to be articulated. It is noted that national thresholds are cited but as a member of the EU more stringent thresholds may apply.

Liability
An important issue arises. Should a cyclist or group of cyclists, with the assistance of one of the powerful cycling organisations seek redress, and succeed, in the right to clean air, for example through the European Court of Human Rights, just who would be held to account? Individual officials

or the Council? The former would hopefully absolve the taxpayer from costs whereas the latter would not. With air quality having already fallen short of European standards any legal defence looks weak. Legislation removing the shield of collective responsibility so that individuals can be held to account might focus minds more acutely. Those planning officials that are confident that local developments will not result in deterioration in air quality should have no problem in insuring against litigation and those officials that harbour doubts are able to preserve their integrity. Possible fines for breaking EU pollution levels should also fall on officials rather than the taxpayer.

Outlook

The A46 Shurdington road is an obvious restriction to future local developments unless a radical restructuring of the road system along this corridor is envisaged. It would appear that the limit of congestion has been reached if not exceeded. The one "green" solution to A46 traffic pollution that does not involve massive disruption that fits well into renewable energy policies would arouse public opposition far exceeding any plans for housing development on green fields.

There appears to be a lack of long term planning at all levels regarding sustainable growth. Disastrous national immigration and energy policies together with an opportunistic attempt to boost the economy have made planning for the future a tremendous challenge. The JCS is looking at housing developments over the next few decades but the consequences of this policy for the years beyond this are not considered; descendants of new housing schemes will, in their turn, want more houses but this is deferred as somebody else's problem. Engineers concerned with controlling systems have developed the concept of feedback whereby the demand to a system is modified by some function of the output; positive feedback augments the input whereas negative feedback reduces it. Time derivatives of the output are incorporated to improve stability. Applied to housing demand the political class need not worry too much about the magnitude of the initial feedback but they must learn to get the sign right. The politicians need a lesson in system stability.

The JCS needs the courage to question the national demands being made for housing that may, long term, be insatiable and grasp the opportunity to lead planning authorities in achieving a sustainable future. The public mood suggests support for a stand against national diktats and a move to localism so frequently advocated but rarely countenanced.

[redacted]
12 Justicia Way
Up Hatherley
Cheltenham
GL51 3YH

19th. November 2013

Na[redacted] **Ref: Planning Application 13/01605/OUT**

Address 21 HAWKSWOOD RD, CHELTENHAM, GL51 3DT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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BUILT
Recd 19 NOV 2013
ENVIRONMENT

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Page 1123

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Other comments: .....

SEE ATTACHED

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1.

In London the Council refused to reveal the number of homes given to foreigners. London let 376,000 - 400,000 homes to foreigners, costing the tax payer £62,000.

How many of the JCS homes will be for Cheltenham, Gloucester, Tewkesbury families?

2.

A Traffic survey shows that if all the homes proposed by the JCS are built, traffic would queue on the A.46 beyond the A.417 to the M5. It could take one hour to travel from Cheltenham to the A.417.

The RAC say 2.6 million families have 4 cars or more (not the 1.6 cars per family estimated by the JCS). Rising by 31.5 per cent by 2020, would Warden Hil become a rat run and parking lot for the new homes across the road?

3.

Hayden Lane - would we be prepared to drink sewerage water? Thames Water supplies 3.5 million homes. In London they face a deficit of 125 million litres per day. Their estimate by 2020 is that Thames Water will have a 16% deficit, leaving 2.2 million people short of water. Already around Reading and Oxford people are drinking recycled sewerage water.

What are you doing about this as we have only one sewerage plant in Gloucestershire which flooded in 2007?

4.

Cancer Research UK has reported that harmful fumes from cars could result in 223,000 deaths globally every year through car pollution.

What will you do about the health of the residents of Cheltenham?

5.

We are already running short on gas and electricity supplies and have been warned to expect possible "black outs" in 2014. Has this all been taken into consideration?

6.

Our children will face debt, unemployment, flood, drought, storms, and massive immigration on a scale not so far seen in this country. Is the answer

to concrete over our glorious green fields and countryside? The Conservative manifesto promised we will put neighbourhoods in charge of planning and development, so listen to us. This must not be solved at the expense of our children and grandchildren's heritage.

I pray they are up to the challenge ahead.

Nam[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ....32...MOOREND...PARK...ROAD...GL53...0JY.....

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Other comments: Experience should show developers that building on a flood plain is at best bad practice and at worst risky and unhealthy. Existing properties already experience water-logged ground in the winter.

Name .... [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address .....21 PILFORD AVENUE BECKHAMPTON CHELTENHAM GL53 9EJ.....

(include, delete or modify the following statements as appropriate)

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Other comments: This is land easily accessed by a large number of families

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 199 Leckhampton Road Cheltenham

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ..MARLBORO, SHURDINGTON ROAD, GL53 ONJ.....

(include, delete or modify the following statements as appropriate)

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Recd 19 NOV 2013
ENVIRONMENT

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Other comments: The facilities such as shops and parking on Bath Road and Leckhampton will be adversly affected by an increase in homes.

The proposed style of housing is not in keeping with the area

The increase in traffic over the recent fatal accidents will only serve to make the place more dangerous.

I STRONGLY OBJECT TO THIS DEVELOPMENT & DESTRUCTION OF THE COUNTRY SIDE.

Name [redacted] **: Planning Application 13/01605/OUT**

Address 36 MOOREND ST, CHELTENHAM, GL53 0EH.

(include, delete or modify the following statements as appropriate)

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BUILT ENVIRONMENT
Rcvd 19 NOV 2013

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Other comments: .....

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Name [redacted] Ref: Planning Application 13/01605/OUT

Address 56 MOOREND ST GL53 0EH

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(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

BUILT
Recd 19 NOV 2013
ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Nam[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 1 Chadton Gardens Cheltenham .....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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Other comments: .....

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N[redacted] **Ref: Planning Application 13/01605/OUT**

Address 67, Moorend Park Rd, Leckhampton GL53 0LG

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 67, Moorend Park Rd, Cheltenham GL53 0LG

(include, delete or modify the following statements as appropriate)

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(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] Ref: Planning Application 13/01605/OUT

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Address 61, Moorend Park Road, Leckhampton, GL53 0LG

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

BC Rec'd 19 NOV 2013 ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: No greenfield sites should be built on until all brownfield sites have been developed

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 64 MOOREND PARK RD, CHELTENHAM, GL53 0JY

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

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Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 126 WARDEN HILL ROAD, CHELTENHAM, GLOS, GL51 3EH

BUILT
Recd 20 NOV 2013
ENVIRONMENT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

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(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

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Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 26 Hall Rd, GL53 0EE

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Rec'd
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(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments:

Church Road and Hall Rd are already very busy and would struggle with additional traffic More traffic near a primary school is unwelcome

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ...224...OLD BATH ROAD, CHELTENHAM.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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BUILT
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Other comments: .....

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Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 21 Meestones Close Cheltenham GL50 2ST

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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BUILT
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(d) I am personally affected and deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development. My property + garden

(e) I is adjacent to the Shurdington Road and my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments:

I am worried about the drainage system being adequate if it is not then flooding would occur on the Merestones estate as the two brooks go through that area

Na[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 14 Pitford Rd, Cheltenham .....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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BUILT
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Other comments: .....

There are insufficient senior school places even now, both Bulcaras and Balcaside have no plans to expand but catchment areas may have to change to accommodate the new development;

The Application is premature and should not go before the Planning Committee until the JCS strategy for the area of Cheltenham, Tewkesbury and Gloucester City has been finalised.

[redacted] .... **Ref: Planning Application 13/01605/OUT**

Address .....Greenacres, Cripplegate Road, Leckhampton GL51 4XT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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BUILT
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(d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~We~~ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: The long - continued threat of a huge housing ~~that~~ estate on this lovely piece of countryside is affecting my health and that of my husband. Please quash this application ONCE + FOR ALL!

Nam [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ..IRE-MAIR, LERKHAMPTON LANE, SHURDINGTON GLS1 4XW.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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BUILT
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(d) We are ~~I am~~ personally affected ~~I deeply concerned~~ by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) We my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

We are particularly concerned that the infrastructure is quite unfit for the purpose proposed. The A46 is already congested at peak times. There is no new proposal for expanding secondary education.

Name .. [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ..21 Paddocks Lane, Bleht GL50 4NU.....

(include, delete or modify the following statements as appropriate)

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BUILT
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Other comments: .....

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BUILT
Rec'd 20 NOV 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

- This application is premature and should not go before the Planning Committee until the joint Core Strategy for Cheltenham, Tewkesbury and Gloucester City has been finalised.
- Not a continued Developers Cluster.
- Kidnappers Lane into Church Road and Shurdington Road will be closed.
- Extra vehicles into the Area.
- Development would allow COALESCENCE between LECKHAMPTON and SHURDINGTON.

Name [redacted] Ref. 13/01605/OUT

Address 'CALVES CLOSE', CHURCH ROAD.
LECKHAMPTON. CHELT - GL53 0QS.

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

1. The impact of 650 new houses on the Leckhampton green fields will ruin forever the aspect from Leckhampton Hill
2. The impending increase in traffic is unimaginable.
3. Will the traffic from the proposed new development be forced to use the Shurdington Rd. or will they be able to use Church Road which already suffers from congestion.
4. What will be the effect on the natural drainage in the area.

Name [redacted]

Address [redacted] Bath Rd.

BUILT
Ref. 13/01605/OUT
Recd 20 NOV 2013
ENVIRONMENT

[redacted]

Portland Practice
St Paul's Medical Centre
121 Swindon Road
Cheltenham
Glos
GL50 4DP

01242 215020

BUILT
Recd 20 NOV 2013
ENVIRONMENT

Hatherley Branch Surgery, Glebe Farm Court, Up Hatherley, Cheltenham, Glos GL51 3EB 01242 864890

14th November 2013

Planning Team
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
Glos GL50 9SA

Dear Sir

Ref: Planning Application 13/01605/OUT

The partners of Portland and Hatherley Surgeries would like to register their objections to the proposed developments.

There is, and will not be, adequate infrastructure to support the proposed developments.

Local doctors' surgeries are already extremely busy. No provision has been made for the immense influx of additional patients with which such proposed developments would flood the local area.

Hatherley Surgery is already bursting at the seams. All usable physical space is used and we are already hot-desking. There is simply no physical space left within the building to cater for the huge numbers of new patients who would be introduced to the area.

The 'new GP surgery' shown in the plans for the Leckhampton fields merely represents the relocation of an existing surgery to a different site.

We have made our concerns very clear to the developers, both at the Leckhampton Forum and at separate meetings, but the developers have utterly failed to provide any solution to the problems their proposals would cause.

We strongly object to the proposed developments.

Yours faithfully

[redacted]

Portland Practice & Hatherley Surgery

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 42 MOOREND PARK ROAD, CHELTENHAM

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I am appalled at the prospect of building on our wonderful Leckhampton fields. Imagine the traffic problems!

Nam[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 4 CHURCH ROAD LECKHAMPTON CHELTENHAM GL53 0PR

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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(e) I / ~~my family~~ greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: In spite of there being a Weight Restriction sign (7.5T) at the Leckhampton Road end of Church Road many lorries above this weight are driven along this route. This restriction requires more strict enforcement to ease the present traffic problems.

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

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Address 326 Old Bath Rd. Cheltenham GL53 9AY

BUILT
Recd 21 NOV 2013
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(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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Other comments: As well as my objection to building on green field sites, I question the need for such development. The population of Cheltenham is already growing because of infill developments and building in gardens. Where are all these people to find jobs? I have seen the despair of young people desperate for a job and Cheltenham has little industry to provide employment.

Nam [redacted] **Ref: Planning Application 13/01605/OUT**

Address 163 LECKHAMPTON ROAD CHELTENHAM GL53 0AD

BUILT
Recd 21 NOV 2013
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Other comments: ARE THE PROPOSED HOUSES GOING TO BE THE DREARY STANDARDISED 'DESIGN & BUILD' TYPE OR WILL THEY HAVE MORE CHARACTER AND AESTHETIC APPEAL THAN THAT? WHAT ABOUT RETIREMENT HOMES FOR PEOPLE WHO WANT TO DOWNSIZE? THIS WOULD FREE UP LARGER HOUSES FOR FAMILIES. ANY PLANS FOR HOUSES SUITABLE FOR WHEELCHAIR USERS? SEE ATTACHED FT ARTICLE WHICH MAKES SOME PERTINENT POINTS ABOUT UK HOUSING POLICY

Name ..[redacted]..... **Ref: Planning Application 13/01605/OUT**

Address ..[redacted]..... Page 1175

(include, delete or modify the following statements as appropriate)

BUILT
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(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I have particular concerns regarding existing traffic problems in Leckhampton which will be exacerbated by the proposed development.

This area suffers already from poor drainage - huge development will contribute greatly to this problem as has been proved several times already in this county particularly housing permitted by Tewkesbury Planners.

Local schoolchildren are already missing out on local 2nd/3rd school allocation - again additional housing will make these problems considerably worse.

Name [redacted] **f: Planning Application 13/01605/OUT**

Address 17 VINERIES CLOSE, GL53 0NU.

BUILT
Recd 21 NOV 2013
ENVIRONMENT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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Other comments: .....

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Cheltenham. And this does not include the other 795 homes proposed. A recent government report warns that towns where traffic prevents people commuting will drive jobs away.

It is very important to respond on the proposed development. You can use this tear off slip if you wish

Name ..[redacted]13..... **Ref: Planning Application 13/01605/OUT /**

Address .....76 LECKHAMPTON ROAD.....

BUILT
Recd 21 NOV 2013
ENVIRONMENT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

by the developers showed very strong opposition to development on the Leckhampton
Over 94% of people were opposed or strongly opposed to the proposed development.

It is very important to respond on the proposed development. You can use this tear off slip if you wish

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I am appalled at the prospect of these houses being built on the wonderful green fields in Leckhampton. Quite apart from the loss, for ever, of these green spaces, the traffic problems will be unimaginable

[redacted]

Name ...

Address 42 Moorend Park Road, Cheltenham

BUILT
Rec'd 13/01605/OUT 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

* Demand exceeds supply already w.r.t Schools especially SECONDARY in this area.
* A46 at a standstill at peak times and when used as a diversion for traffic from A417 / A40 e.g. 4.11.13 and 6.11.13. This impacts on Bath Rd and Town Centre.
* Emergency vehicles take patients from North Cheltenham down A46 at times when A40 blocked.
* Pollution impacts on asthma suffers including my 11 year old.

Name [redacted]

Address Tamarisk Close, Uptherley.

BUILT ENVIRONMENT
Ref. 13/01605/OUT
Rcvd 21 NOV 2013

Leckhampton with Warden Hill Parish Council

PUBLIC CONSULTATIONS ON THE DRAFT JOINT CORE STRATEGY AND ON A PROPOSAL FOR 650 NEW HOMES ON THE LECKHAMPTON FIELDS

The Gloucester-Cheltenham-Tewkesbury Joint Core Strategy has been opened a second time for public consultation. Even if you responded to the first consultation in 2012, it is important to respond again. You are also invited to respond on the planning application submitted by Bovis and Miller Homes to build 650 new homes on the Leckhampton fields.

PUBLIC MEETING ON PLANNING APPLICATION FOR 650 NEW HOMES

Leckhampton with Warden Hill (LWWH) Parish Council is holding a PUBLIC MEETING on **WEDNESDAY 27 NOVEMBER** at **7.30 pm** at **LECKHAMPTON PRIMARY SCHOOL**. Tracey Crews (Cheltenham Borough Council Director of Planning), Craig Hemphill (Planning Officer) and Mark Power from Gloucestershire Highways will be attending to answer questions and hear your views. All local residents, whether or not in the Parish, are invited.

MAIN OBJECTIONS TO THE PLANNING APPLICATION

1. The JCS may have greatly over-estimated how many new homes are needed

The JCS estimates that 10,800 new homes are needed in Cheltenham between now and 2031. It proposes building 6699 of these on greenfield sites - 1075 in Leckhampton, 795 between Chargrove Lane and Up Hatherley Way and 4829 in north-west Cheltenham. However, the government Office of National Statistics estimates that only 6070 new homes are needed. Based on the ONS figures, there is no need to build on the Leckhampton fields.

2. Traffic queue on A46

We already have long traffic queues on the A46. Expert analysis predicts that the 1075 new homes proposed in Leckhampton plus 1548 also proposed in Brockworth would make the morning A46 traffic queue over 3 miles long. It could take over an hour to commute into Cheltenham. And this does not include the other 795 homes proposed. A recent government report warns that towns where traffic prevents people commuting will drive jobs away.

It is very important to respond on the proposed development. You can use this tear off slip if you wish

---

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 2 CHARNWOOD CLOSE LECKHAMPTON GL53 0HH

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

BUILT ENVIRONMENT Recd 21 NOV 2013

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

3. Traffic congestion in Church Road

The developers recognise that it is essential to prevent any substantial increase in the peak time traffic in Church Road, which is close to gridlock. Their suggested solution is to partially close Leckhampton Lane and to close Kidnappers Lane; then to make a tortuous route through the new development to hopefully discourage through traffic between the A46 and Church Road. Not only is this liable to cause many accidents but also it will substantially increase traffic levels on Moorend Park Road.

4. Traffic pollution from the A46 traffic queue and in Church Road

A new government report says that traffic pollution poses a serious health risk. Stationary and slow moving traffic causes the most pollution. Measurements by the Borough Council show that pollution levels already exceed EU-permitted limits near the A46 junction with Moorend Park Road. Pollution in Church Road has exceeded EU-permitted limits in winter.

5. Risk of flooding

The developers' flood prevention and drainage plan uses balancing ponds to capture run-off from the proposed development. Many of these ponds will be deep and well below the water table. So they might partially fill with water and would then not have sufficient capacity. The development could also affect underground water flows under the A46 into Warden Hill. The developers believe it should all work fine but they cannot be absolutely sure.

6. Lack of sufficient school places

The proposed development includes a new primary school, but this would not be built until a later stage in the development. In the meantime there would be no primary provision for the first 300 or so homes. For secondary schooling, Balcarras and Bournside are always over-subscribed. They are both academies and cannot be forced to expand. Balcarras has insufficient land to expand anyway. At the JCS public consultation event on 19 October, the JCS team could give no answer on secondary schooling to concerned residents.

7. The strong public opposition to development

The findings from the public surveys conducted by LWWH Parish Council at the exhibitions held by the developers showed very strong opposition to development on the Leckhampton fields. Over 94% of people were opposed or strongly opposed to the proposed development.

It is very important to respond on the proposed development. You can use this tear off slip if you wish

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✓ (d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

✓ (e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: There are in the area a number of brown field sites, which are derelict, often dangerous & an eyesore. These should be developed first to provide low cost residences for first time buyers who prefer central city sites where work and public transport are readily available (in contrast to inaccessibility from "out in the sticks". Traffic congestion & pollution are currently a problem — the proposed development will make the situation worse.

Joint Core Strategy Team
Municipal Offices
Promenade
Cheltenham
Glos
GL50 9SA

BUILT
Recd 21 NOV 2013
ENVIRONMENT

10th November 2013

Dear Sirs,

Re: Application 13/01605/OUT

Please accept this letter of objection in relation to the above proposal.

The whole infrastructure within this area will be unable to deal with the additional properties being constructed.

Traffic along the Shurdington Road is already at a stand still at rush hour going towards Brockworth and the Bath Road. There are no big employers in Cheltenham anymore so people will be commuting out of town.

The risk of being flooded again is certainly only a matter of time. The fields at the rear and side of Brizen Farm and land between Chargrove Lane and Up Hatherley Way are already sodden. In parts the water is 3-4 inches deep.

I went to the consultation in December 2012 at the Hatherley & Reddings Cricket Club. A question was raised about the calculations used for the drainage and where the water course would run to. I was horrified to find out the calculations used did not include the rainfall for the years 2007-2012. I asked the representative if he had taken a walk over the fields (after heavy rainfall) to see how much water was sitting and running off the land. Sadly his reply was no!

Another question was asked about the continuous blocked drain situated on the A46 Shurdington Road in front of the Shurdington sign and by Brizen playing field and the public footpath going into Brizen field. The reply received was 'we don't know where that drain runs to, can't find out'. So, once the houses are constructed and water needs to go through the drains and they are blocked the water will obviously find its lowest point and flood.

I would also like to point out that as we all know the recent predicted storms at the end of October 2013 caused great concern and the Meteorologists issued severe weather warnings. I walked along the Shurdington Road on Sunday 27th October 2013 and personally cleared the drains from mud, leaves and debris to ensure as much

water could run into the drain. Kidnappers Lane was also is a terrible condition. Surely the local council should have had the relevant vehicles out clearing and sweeping up? There had certainly been enough hype about the weather for at least a week beforehand!!

The schools are already over subscribed so where will the new residents obtain their education?

Has anyone taken into consideration the 2 new developments already recently constructed at Manor Farm and Cheltenham Green within a 1-2 Mile radius? The number of excess cars from these estates, people and general pressure in infrastructure?

Yours faithfully,

[redacted]

7 Tayberry Grove
Up Hatherley
Cheltenham
Glos
GL51 3WF

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ...7 Century Court, Montpellier Grove, Cheltenham.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and ~~gridlock in Church~~ Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

BUILT
Recd 22 NOV 2013
ENVIRONMENT

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(e) I / ~~my family~~ greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

Referance: 13/01/605/OUT

Signed: [redacted]

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT** 16/11/2013

Address ....45....ST. MICHAEL'S RD, LECKHAMPTON, CHELTENHAM.....GL51 3RP

(include, delete or modify the following statements as appropriate)

BUILT
Rec'd 22 NOV 2013
ENVIRONMENT

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(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems. Not only at peak periods but all day every day.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.
Church road can't take any more traffic, especially at school times, with parked cars making the road very narrow. The exit onto Leckhampton Hill is very slow because of all the cars coming down from the Air Balloon.

(d) I am personally ~~affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development. The pollution levels are already more than the safe limit

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Recent rains caused floods in several places on the A46, the proposal of balancing ponds will nowhere cope with the amount of water which comes off the hills & from the many springs on the side of the hills. When it reaches the streams coming through Merestones and down Farmfield Rd the water is quite excessive despite recent flood prevention works.

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 21 HICHFIELD DRIVE, WARDEN HILL, CHELTENHAM, GLOS. GL51 3DQ

(include, delete or modify the following statements as appropriate)

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BUILT
Rec'd 22 NOV 2013
ENVIRONMENT

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Other comments: WARDEN HILL HAS AN AGEING POPULATION

I AM 90 YEARS OLD & LIVE ALONE. IN 2007 I HAD TO CALL FOR HELP TO INSTALL SANDBAGS AROUND MY BUNGALOW DUE TO FLOODING

ANY FUTURE DEVELOPMENT WILL INCREASE THIS THREAT WHICH IS SO WORRYING & HAZARDOUS FOR ELDERLY PEOPLE

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 13 ST ALBANS CLOSE, WARDEN HILL, CHELTENHAM, GLOS GL51 3DW

(include, delete or modify the following statements as appropriate)

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BCH
Recd 22 NOV 2013
ENVIRONMENT

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Other comments: Our bungalow backs directly onto the A46 Shurdington Road so we already suffer from continual noise + constant pollution. This development will bring these to unacceptable levels.

This, along with the fear of flooding is causing untold misery + affecting our health.

Name ..[redacted] Ref: Planning Application 13/01605/OUT

Address ....100 FARM FIELD Rd CHELTENHAM GL51 3RA

(include, delete or modify the following statements as appropriate)

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BUILT
22 NOV 2013
ENVIRONMENT

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Other comments: THE COUNCIL AGREED TO A PERMANENT BOUNDARY ON THIS GREEN BELT LAND. WHY HAS THIS CHANGED

It is very important to respond on the proposed development. You can use this tear off slip if you wish

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 30 CAMPION PARK UP HATHERLEY CHELTENHAM GL51 3WA.

(include, delete or modify the following statements as appropriate)

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(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

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DUTY
Recd 22 NOV 2013
ENVIRONMENT

It is very important to respond on the proposed development. You can use this tear off slip if you wish

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: It is impossible to predict how many houses the town will need. Predicting is Pie in the Sky! No other country has this mad system - when a man wants a house sell him a plot of land owned by the developer and constructed only after sold. I would be so pleased to talk to those concerned and describe how it was done in South South Africa - that way no one ever lost money! Plus ex employee for the hous

Name [redacted] .... **Ref: Planning Application 13/01605/OUT**

Address TREETOPS LECKHAMPTON HILL CHELTENHAM. GL53 9QG.

(include, delete or modify the following statements as appropriate)

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BUILT
Recd 22 NOV 2013
ENVIRONMENT

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Other comments: We feel that greater efforts should be made to build on brownfield sites in Cheltenham; also to build less superfluous supermarkets.

JCS TEAM.
MUNICIPAL OFFICES
CHELTENHAM GL50 9SA

Name .. [redacted]

Ref: Planning Application 13/01605/OUT

Address ..2 THE SPINDLES, THE LANES, LECKHAMPTON, CHELT GL53 0QD

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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BUILT
Recd 22 NOV 2013
ENVIRONMENT

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Other comments: Secondary Schooling is a real concern with Balcarras and Bournside always over subscribed

Name [redacted] ..... Ref: Planning Application 13/01605/OUT

Address ...2 The Spindles Leckhampton Cheltenham GL53 0QD

(include, delete or modify the following statements as appropriate)

BUILT
Recd 22 NOV 2013
ENVIRONMENT

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(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems. People would be deterred from working in Cheltenham.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road. The travel to local schools, in particular Leckhampton is already dangerous for children.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

The travel to school along Church Road is already dangerous with too much traffic and cars mounting pavements trying to get through gridlock - let alone poor pollution levels.

There will be no secondary school placements.

* Recent research draws the population is not growing + has hit its maximum.

Nam[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 1, BARNFIELD, BLACKSTONE EDGE OLDRD., LITTLEBOROUGH, LANCS. OL15 0JL

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(e) ~~I/~~ My family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

MY FAMILY HAVE ENJOYED AND BEEN ENRICHED BY THE LECKHAMPTON FIELDS AND THEIR RICH VARIETY OF WILDLIFE AND LANDSCAPE; IT IS APALLING TO CONSIDER DESTROYING THIS PRICELESS ASSET.

Name [redacted] Ref: Planning Application 13/01605/OUT

Address 11 VINERS CLOSE, CHELTENHAM, GL53 0NU

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

BUILT
Recd 22 NOV 2013
ENVIRONMENT

(d) I am personally affected ~~/ deeply concerned~~ by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~I~~ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: None of the proposals from the develope show a credible or achievable way of safely managing ~~the~~ increased traffic flow around Shurdington Road / Kidnappers Lane / Church Road.

Name ... [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ..2 WHITLEY COURT, LECKHAMPTON RD, CHELTENHAM, GL53 0BJ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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BUILT
Recd 22 NOV 2013
ENVIRONMENT

(d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / ~~my family~~ greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: If the planning proposal went ahead and 1,000 - 2,000 homes were built in Leckhampton / Charlton Park have a Hatherley Way, quite apart from all the additional cars which homeowners would have, has any thought been given to the demands on school places, not just at Primary Level but importantly Secondary Level - I understand Balcarras is full & Chosen Hill is oversubscribed already.

MANY PROBLEMS ARE GOING TO BE CREATED, THINK THROUGH ALL THIS VERY CAREFULLY.

Name .....[redacted]..... **Ref: Planning Application 13/01605/OUT**

Address ..Foxglove, 1 Moorend Green, Cheltenham GL53 0EY

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

✓ (a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

✓ (b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

✓ (c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

BUILT
Rec'd 22 NOV 2013
ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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13/01605/OUT

Land at Leckhampton

Representations

Batch 8

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 21 Durham Close, Page 1214 ham, GL51 3JX

(include, delete or modify the following statements as appropriate)

BUILT
Rec'd 25 NOV 2013
ENVIRONMENT

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: The views of open fields and Leckhampton Hill from the A46 adjoining the Leckhampton Fields are extremely important, and should be preserved

Name [redacted] **Planning Application 13/01605/OUT**

Address 346 OLD BATH ROAD, CHELTENHAM GL53 9AF

BUILT
Recd 25 NOV 2013
ENVIRONMENT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected ~~deeply concerned~~ by the health and accident risks from the traffic queues and pollution that would result from the Proposed Development.

(e) M my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Given recent traffic incidents on both Cudeley Hill & Shurdington Road, I would suggest that the above mentioned traffic related scenarios now have even greater substance. I personally believe that these plans are Madness!

22/11/13

Name [redacted] Ref: Planning Application 13/01605/OUT

Address 346 OLD BATH RD, CHELTENHAM GL53 9AF

BUILT
Recd 25 NOV 2013
ENVIRONMENT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected and deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) My family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Nam[redacted] plication 13/01605/OUT

Address Old Meadow House Page 1220 Crippetts Lane

(include, delete or modify the following statements as appropriate)

GL51 4XF

BUILT
Recd 25 NOV 2013
ENVIRONMENT

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / ~~deeply concerned~~ by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~We~~ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 12, Kirlin Close, Leckhampton, Cheltenham, GL53 0NF.

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

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(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ...81 MOOREND ROAD CHELTENHAM GL53 0HB.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected ~~/ deeply concerned~~ by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~I~~ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 9 LIDDINGTON CLOSE LECKHAMPTON GL53 0AH

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am ~~personally affected /~~ deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / ~~my family~~ greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Nar[redacted]

Add[redacted] age 1228 **Ref: Planning Application 13/01605/OUT**

..... MONTPELIER GROVE, CHELTENHAM GL52 2XR

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~I / my family greatly value the Leckhampton fields for recreation~~. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 1, KENELM GARDENS, CHELTENHAM, GLOS GL53 0JW

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

The congestion of traffic will cause huge tail backs and deaths or serious injuries in Shurdington Road mainly caused by vehicles from the proposed development.

(d) I am personally affected & deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....I... personally find it very dangerous to turn right from Kenelm Gardens... ...onto Shurdington Road when traffic is queing at Moorend Park Rd traffic lights which includes any traffic coming out from Cheltenham. 10% more traffic will lead to Grid Lock, and treble the number of road deaths & serious accidents — PLEASE DON'T KILL ME..... .....I am a keen walker and enjoy the open fields going up to Leckhampton ....hill. This area is flat and boggy after rain with a high water table. Plans by developers are not adequate to avoid serious flooding on the site.....

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 18 EYNON CLOSE, CHELTENHAM. GL53 0QA

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

PTO

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: We need green space for positive Mental Health - not just parks/sports fields but green spaces which are natural + which host lots of wildlife. I walk over Leckhampton fields every day + it lifts one's mood considerably. I have seen deer, foxes, herons, woodpeckers, bats + many other wild creatures as well as lots of beautiful flora on my walks. A noisy development would deprive Leckhampton residents + their families of this wonderful + v. children, educational experience. Not everyone has the transport or the physical ability to walk further + further afield to find this form of natural refuge.

[redacted]

Name [redacted] .... **Ref: Planning Application 13/01605/OUT**

Address 202 OLD BATH Page 1234 CHELTENHAM GL53 9EQ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: WE HAVE NOTICED A BIG INCREASE IN TRAFFIC ALONG CHARLTON ROAD TOO & THAT BEFORE THE NEW HOUSING & CARE HOME ARE OCCUPIED. CHURCH ROAD IS ALREADY A NIGHTMARE & DIFFICULT TO GET ALONG AS DUE TO PARKED CARS IT'S A SINGLE LANE FOR MOST OF THE WAY. BOTH ROAD ARE REALLY DANGEROUS TO CROSS ON THE SCHOOL RUN.

Name [redacted] **F: Planning Application 13/01605/OUT**

Address ...8 Birch Close, Leckhampton, Cheltenham.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected And / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Myself, family and friends use the Fields in qestion alot. Our children love nothing More than playing football, walking, going on nature trails and blackberry picking in these fields. Our British Countryside should be cherished and not destroyed For the sake of unecessary housing For greedy developers to profit from.

Nam[redacted] ... **Ref: Planning Application 13/01605/OUT**

Address [redacted]

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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[redacted]

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ....1 Southern Road Cheltenham GL53 9AW.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development. both

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: The pressure on local Primary schools is already high with some local parents unable to secure a local school place in any local school. Pressure on secondaries is a concern to me as a parent living on the edge of a catchment area. I am concerned as I do not believe these issues have been addressed. Safety issues relating to heavy traffic during the school run around Leck Primary School concern me as a parent. We value the Leck. fields for recreation.

Nam[redacted] **Ref: Planning Application 13/01605/OUT**

Address 16 SOUTHERN ROAD, LEIGHTON, CHELTENHAM, GL53 9AW

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) ✓ Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) ✓ The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) ✓ The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) ✓ I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ✓ I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 4 NOUISE CLOSE CHELTENHAM GL53 0NQ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

It is very important to respond on the proposed development. You can use this tear off slip if

(d) I am personally affected + deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I + my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments:

Little regard appears to have been paid to the impact of the proposals and the projections seem to be speculative at best. The very fabric of the local community in this area would be destroyed with lack of green field amenities. This is not organic growth but mere speculation based on unsound data.

You need to prove that local opinion is listened to and not merely paid lip service.

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address [redacted] CHELTENHAM GL53 0NQ

(include, delete or modify the following statements as appropriate)

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(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ef: Planning Application 13/01605/OUT

Address 18 BRIZEN LANE, LECKHAMPTON, CHELTENHAM, GL53

(include, delete or modify the following statements as appropriate)

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I agree with (a) to (e) above, and over the page

* Please read attached article from a recent ECHO *

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Other comments: This land, along with the land west of Farm Lane (formerly SD2), should be re-designated to Green Belt giving it ~~total~~ protection in the future.

I totally concur with the responses from CPRE, Natural England, Leckhampton with Warden Hill Parish Council, Shurdington Parish Council and Leckhampton Green Land Action Group. All the objections made by them could not be done any better by me. (see over)

Your say...

Letters are welcomed on all subjects. The editor reserves the right to edit contributions. Names and addresses must be supplied but can be excluded on request at the editor's discretion. Email: echo.lettersglosmedia.co.uk Our postal address is: Letters, Gloucestershire Echo, Third Floor, St James' House, St James' Square, Cheltenham, GL50 3PR. Follow Kevan Blackadder on Twitter @GlosEchoEd

@GlosEchoEd @echo.letters@glosmedia.co.uk

Picture: Kevin Fern CHKF20130430A



OFFICIAL VISIT: Rt Hon George Osborne MP, Chancellor of the Exchequer, meets political reporter Jack Maidment at the *Echo* offices

What hope when even Chancellor's views fall on deaf ears?

GEORGE Osborne, Chancellor of the Exchequer, visited the Cheltenham area on April 30 and called in to see the *Echo* staff.

Political reporter Jack Maidment carried out an interview with him, during which Mr Osborne made the following statement:

"We absolutely want to protect the greenbelt, but we also want to make sure that people who grow up in the towns and villages of Gloucestershire have a chance of living in the place they grew up, and they aren't going to if there aren't homes for them to live in and house prices price them out of the market and they can't get a mortgage.

"We are trying to make sure that more homes are built, but they are built in the appropriate spaces, not in the greenbelt or in the parts of our countryside that are the most beautiful."

As Jack put in his article, George Osborne was trying to placate angry campaigners who believed the coalition government had declared war on the countryside with its plans to liberalise planning law to boost house building.

Why haven't Cheltenham Borough Council officers, councillors and members of the JCS team taken any notice of one of the most powerful men in Britain when he makes a statement like this to a reporter in Cheltenham?

JP
Cheltenham

[redacted] Ref: Planning Application 13/01605/OUT

Address 18 BRIZEN LANE, LECKHAMPTON, CHELTENHAM, GL53 ONG

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I AGREE WITH ALL OF THE ABOVE, AND OVER THE PAGE
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Other comments: This whole area along with the white land formerly called SD2 shall be re-classified to Green Belt, giving it full protection in the future. I agree completely with respanses from CPRE, Leckhampton with Warden Hill Parish Council, Shurdington Parish Council, Natural England and LEGLAG. Their declarations are absolutely my views and I agree 100%.

your say...

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Picture: Kevin Fern CHKF20130430A



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JP
Cheltenham

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

Schools are already full - primary & secondary

Doctors Surgeries full - can't get appointments as it is!

Roads too busy now - can't cope - particularly A46

Infrastructure can't support any more development

We bought our house because it was on a Greenbelt & this should remain!

Name [redacted]

Ref. 13/01605/OUT

Address 5 Gardenia Grove
Up Hatherley GL51 3HR

BUILT
Rcvd 22 NOV 2013
ENVIRONMENT

[redacted]
46 Merlin Way
Cheltenham
GL53 0LU

20 November 2013

CBC Planning
Municipal Offices
Cheltenham
GL50 9SA

Your Ref: 13/01605/OUT

Dear Sir/Madam,

We wish to object to the proposed development of 650 houses on several counts:-

- We believe it is inadvisable to allow such an application given that the JCS has not been agreed upon and may change from its current draft form. This planning application may not be needed at all or may not fit well with the final strategy.
- The figures for housing needs in the JCS are contentious and we believe they are higher than necessary, a view which we understand to be supported by figures from the ONS. Further to that, any homes already built and permitted since the first issue of the JCS at Up Hatherley should be deducted from whatever is determined as the total requirement. Given these factors, this development is very likely not needed and should not be allowed at this time.
- We do not think sufficient consideration has been given to the traffic problems likely to be caused by the development, particularly on the A46 inwards from the A417 and roads off it, including Leckhampton Lane and Church Road. We believe Church Road is already beyond its capacity and adding further traffic would cause serious problems. Only a week or so ago on a relatively quiet afternoon we observed traffic having to back up just because a couple of transit-sized vans were trying to pass in opposite directions.
- We are alarmed to learn that traffic pollution already exceeds permitted EU permitted levels near the A46 junction with Moorend Park Road and at times in Church Road. The latter is particularly worrisome due to the nearby Primary School and the potential harm to pupils.
- We remain unconvinced that the developer's flood prevention is adequate due to the ponds being well below the water table.
- We believe infrastructure should come first in development so that a chaotic and unsatisfactory situation does not arise where housing is built without the proper support in place. This particularly applies to schooling and traffic management, as mentioned above.
- The area affected is adjacent to an Area Of Outstanding Natural Beauty and we feel that the development will unnecessarily detract from that.

Yours faithfully,

[redacted]

Arthur & Kathy Webb

BUILT
Recd 25 NOV 2013
ENVIRONMENT

1, Kenelm Gardens,
Cheltenham,
Glos. GL53 0JW
21 November 2013
[redacted]

J.C.S Team,,
Municipal Offices,
Cheltenham,
Glos. GL50 9SA

Dear Group Leader,
I lodge my objections to planning application 13/01605/OUT

Firstly the number of homes in the Cheltenham area has been vastly over estimated. The number of persons inhabiting each house in the Cheltenham area which has been dropping and is currently 2.2 people per a house is about to start increasing which a censis taken in 4 years time would indicate. These harsher financial conditions will lead to more people living in each house as the population becomes less affluent. Immediately in the vicinity of my house people living on their own have just died or are not expected to live more than 2 years. About a year after their death the house remains empty and the in most cases a family of 4 move into the house.
Housing for young people usually means that they have a family and within 5 years, at least 4 people live in the house.
The result in 7 years time will be 2.3 or even 2.4 people to a house.

The number of jobs in the Cheltenham area has been falling and I see no signs of it increasing in the near future. Thus the position of these homes is wrong for people working in Bristol or the Midlands, One solution is to have some of this housing near Sharpness or nearer the Motorway with the infrastructure for schools and most importantly roads and an improved link road onto the motorway to the north west of Cheltenham.
The infor structure of roads etc must be included in any large development as it is in Cambridgeshire with their track for the bus.

The need for new homes around Cheltenham in the period of consideration will probably be about 9,000 and should not be built on the Leckhampton fields, a green belt area right next to a Cotswold Heritage area of outstanding beauty.

I am very concerned with both the flooding risk on the Leckhampton site, on which practical experience will proof the water pools will prove totally inadequate when water pours of the Cotswold escarpment- the fields which I walk through are completely waterlogged after a heavy wet storm and the water table is very high so that any ponds are half full before the flooding from the escarpment.
Any local walker will confirm this.

The road system is already completely inadequate to take the existing traffic at busy times and a new road system will require to be in place before additional houses are built on this site.

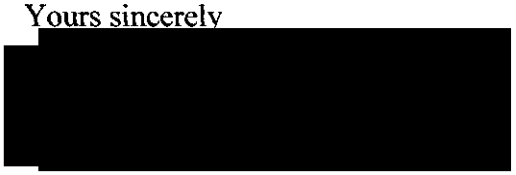
I am already in danger of a motor accident when I leave my home in Kenelm Gardens and turn right towards Brockworth as the road to the left is full of standing traffic at Moorend Park Road traffic l;ights and completely obscures traffic coming out of Cheltenham. Please don't allow this new development- I don't wish to add to the death or serious accident list on this road in the future.

I also suffer from the pollution at the rush hour time in the morning and also in the early evening with standing traffic belching out fumes.
At such times I already develop a chesty cough and it will become far worse if you allow this development to proceed.

I also am a keen walker and try not to use my car by starting and/or ending my walks through the Leckhampton fields- often using the bus to get to one end of my walk.

Trusting that you will make a full re-appraisal of the costs involved in the infrastructure such as roads required before you start granting planning permission. Houses near to peoples place of work and schools are essential in this modern world. Please turn down the planning permission at this stage on Leckhampton fields until the overall housing project for the whole of Gloucestershire is properly reviewed as Cheltenham currently is a small area and has the short end of the stick.

Yours sincerely



It is very important to respond on the proposed development. You can use this tear off slip if you wish

Name [redacted] e.1258. **Ref: Planning Application 13/01605/OUT**

Address 149A LECKHAMPTON RD GL53 0AD. ENTRANCE IN CHURCH RD

(include, delete or modify the following statements as appropriate)

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BUILT
Recd 26 NOV 2013
ENVIRONMENT

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Other comments: Although my address is Leckhampton Rd the entrance to my house is just inside Church Rd. There are parking restrictions outside my house but it doesn't stop parking including Lorries. I have difficulty getting out of my garage and gate as they park on the pavement causing pedestrians going into the road. I can't see round the Lorries coming round the corner from Leckhampton Rd. It is an accident waiting to happen. Extra traffic will make it worse.

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 25, CENTURY COURT, MONTPELLIER GROVE CHELTENHAM.

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BUILT
Recd 26 NOV 2013
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Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address CRIPPETTS FARM, CRIPPETTS LANE, LECKHAMPTON, CHELTENHAM, GL51 4XT

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BCBC
Recd 26 NOV 2013
ENVIRONMENT

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Other comments: .....

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Name [redacted] Application 13/01605/OUT

Address 17 HALL RD., LECKHAMPTON, CHELTENHAM. GL53 0HF

(include, delete or modify the following statements as appropriate)

Received 26 NOV 2013 ENVIRONMENT

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Other comments: The views of open fields and Leckhampton Hill from the A46 adjoining the Leckhampton fields are extremely valuable, as are the views from Church Road/Leckhampton Lane, and they should be preserved.

Nam[redacted] **anning Application 13/01605/OUT**

Address ..6,...UNDERCLIFF AVE...CHELTENHAM...GL53 9AB

BUILT
Rcvd 26 NOV 2013
ENVIRONMENT

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Other comments: .....

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Name .....[redacted]..... **Ref: Planning Application 13/01605/OUT**

Address ..66...CENTURY COURT, Moorend Grove, CHELTENHAM, GL50 2XR

BUILT
26 NOV 2013
ENVIRONMENT

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Other comments: .....

Hand delivered to Municipal Offices on 25/11/13

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ..... 15 CANTERBURY WALK, WARDEN HILL .....

(include, delete or modify the following statements as appropriate)

BUILT ENVIRONMENT Rec'd 26 NOV 2013

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Other comments: .....

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Name [redacted]72..... **Ref: Planning Application ~~13/01605/OUT~~**

Address ...6...NOURSE CLOSE,...LECKHAMPTON,...CHELTENHAM.

BUILT
Recd 26 NOV 2013
ENVIRONMENT

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Other comments: I strongly oppose this development. I think that the area's beauty and character would be destroyed if the proposal is granted and built. The number of houses that the developer proposes is far too many for the area to support. Why should roads and not parks that have been established and used, be changed to suit the demands of this development, and put money into the developers pockets.

Name ... [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 6 Louise Close, Leckhampton, Cheltenham.

BUILT
Recd 26 NOV 2013
ENVIRONMENT

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Other comments: I am strongly opposed to this development I think that the area's beauty and character would be destroyed if the proposal is granted and built. The number of houses that the developer proposes is far too many for the area to support why should roads and footpaths that have been established and used be changed to suit the demands of this development, and put money into the developers pockets

[redacted]

Name [redacted] **Planning Application 13/01605/OUT**

Address ...33 IRVEN PAGE, LECKHAMPTON, CHELTENHAM GL53 0HG

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BUILT
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Other comments: Leckhampton is on the edge of an Area of Outstanding Natural Beauty and we should preserve our landscape.

[redacted]

PLUTT
Recd 26 NOV 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I wish to object to the application for 650 houses on Leckhampton's Green fields. There are many many reasons why I feel this should not go ahead. Shurdington Road is already far too busy with traffic at a standstill most mornings. I am very concerned about drainage in the area; in the floods of 2007 the gardens of Highwood Avenue were flooded this is likely to be exacerbated if more of the land around about is built on. The green fields around Leckhampton are an important recreational resource for Leckhampton residents. The air quality in Leckhampton is already poor and increased traffic will only make this worse.

Ref. 13/01605/OUT

Name [redacted]

Address 9 Highwood Avenue, Leckhampton GL53 0JJ

Leckhampton with Warden Hill Parish Council

PUBLIC CONSULTATIONS ON THE DRAFT JOINT CORE STRATEGY AND ON A PROPOSAL FOR 650 NEW HOMES ON THE LECKHAMPTON FIELDS

The Gloucester-Cheltenham-Tewkesbury Joint Core Strategy has been opened a second time for public consultation. Even if you responded to the first consultation in 2012, it is important to respond again. You are also invited to respond on the planning application submitted by Bovis and Miller Homes to build 650 new homes on the Leckhampton fields.

PUBLIC MEETING ON PLANNING APPLICATION FOR 650 NEW HOMES

Leckhampton with Warden Hill (LWWH) Parish Council is holding a PUBLIC MEETING on **WEDNESDAY 27 NOVEMBER** at **7.30 pm** at **LECKHAMPTON PRIMARY SCHOOL**. Tracey Crews (Cheltenham Borough Council Director of Planning), Craig Hemphill (Planning Officer) and Mark Power from Gloucestershire Highways will be attending to answer questions and hear your views. All local residents, whether or not in the Parish, are invited.

MAIN OBJECTIONS TO THE PLANNING APPLICATION

1. The JCS may have greatly over-estimated how many new homes are needed

The JCS estimates that 10,800 new homes are needed in Cheltenham between now and 2031. It proposes building 6699 of these on greenfield sites - 1075 in Leckhampton, 795 between Chargrove Lane and Up Hatherley Way and 4829 in north-west Cheltenham. However, the government Office of National Statistics estimates that only 6070 new homes are needed. Based on the ONS figures, there is no need to build on the Leckhampton fields.

2. Traffic queue on A46

We already have long traffic queues on the A46. Expert analysis predicts that the 1075 new homes proposed in Leckhampton plus 1548 also proposed in Brockworth would make the morning A46 traffic queue over 3 miles long. It could take over an hour to commute into Cheltenham. And this does not include the other 795 homes proposed. A recent government report warns that towns where traffic prevents people commuting will drive jobs away.

It is very important to respond on the proposed development. You can use this tear off slip if you wish

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 4 GIFFARD WAY, LECKHAMPTON, CHELTENHAM GL53 0PP.

BUILT
Recd 26 NOV 2013
ENVIRONMENT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

3. Traffic congestion in Church Road

The developers recognise that it is essential to prevent any substantial increase in the peak time traffic in Church Road, which is close to gridlock. Their suggested solution is to partially close Leckhampton Lane and to close Kidnappers Lane; then to make a tortuous route through the new development to hopefully discourage through traffic between the A46 and Church Road. Not only is this liable to cause many accidents but also it will substantially increase traffic levels on Moorend Park Road.

4. Traffic pollution from the A46 traffic queue and in Church Road

A new government report says that traffic pollution poses a serious health risk. Stationary and slow moving traffic causes the most pollution. Measurements by the Borough Council show that pollution levels already exceed EU-permitted limits near the A46 junction with Moorend Park Road. Pollution in Church Road has exceeded EU-permitted limits in winter.

5. Risk of flooding

The developers' flood prevention and drainage plan uses balancing ponds to capture run-off from the proposed development. Many of these ponds will be deep and well below the water table. So they might partially fill with water and would then not have sufficient capacity. The development could also affect underground water flows under the A46 into Warden Hill. The developers believe it should all work fine but they cannot be absolutely sure.

6. Lack of sufficient school places

The proposed development includes a new primary school, but this would not be built until a later stage in the development. In the meantime there would be no primary provision for the first 300 or so homes. For secondary schooling, Balcarras and Bournside are always over-subscribed. They are both academies and cannot be forced to expand. Balcarras has insufficient land to expand anyway. At the JCS public consultation event on 19 October, the JCS team could give no answer on secondary schooling to concerned residents.

7. The strong public opposition to development

The findings from the public surveys conducted by LWWH Parish Council at the exhibitions held by the developers showed very strong opposition to development on the Leckhampton fields. Over 94% of people were opposed or strongly opposed to the proposed development.

It is very important to respond on the proposed development. You can use this tear off slip if you wish

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(d) WE ARE I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ✓/ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: THE SMALLHOLDINGS SHOULD BE USED TO GROW VEGETABLES WHICH COULD BE SOLD LOCALLY - THUS REDUCING ROAD MILES. ALSO EGGS AND BIRDS FOR THE TABLE. THIS COULD BE VIABLE WITH LONGER ~~LEASES~~ LEASES. THE HEDGEROWS SUPPORT AN AMAZING AMOUNT OF WILDLIFE FROM WRENS TO BUZZARDS. ALONG WITH THE DEER. WHAT WOULD HAPPEN TO ALL THIS DISPLACED FAUNA? LOTT MEADOW (VERY A WATER MEADOW) SHOWS THE OLD MEDIAEVAL RIDGE & FURROW SYSTEM AND SHOULD BE PROTECTED AS SUCH, ALONG WITH THE MAJESTIC OAKS. PLEASE DON'T "PAVE PARADISE TO PUT UP A PARKING LOT"

N[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ..61 CHARLTON LANE, CHELTENHAM GL53 9DY

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and ~~gridlock in Church~~ Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

BUILT
Recd 27 NOV 2013
ENVIRONMENT

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Other comments: .....

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Nam[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 1 Blackthorn End, The Lanes, Cheltenham, GL53 0QB .....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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BUILT
Recd 27 NOV 2013
ENVIRONMENT

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Page 1284

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Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ...1 BLACKTHORN END, CHELTENHAM GL53 0QB.

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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BUILT
Recd 27 NOV 2013
ENVIRONMENT

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Other comments: .....

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Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address [redacted] Cheltenham, GL53 0JY

BUILT ENVIRONMENT
Recd 27 NOV 2013

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

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(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 40 CENTURY COURT, MONTPELLIER GROVE, CHELTENHAM, GL50 2XR 1289

(include, delete or modify the following statements as appropriate)

BUILT
Rcvd 27 NOV 2013
ENVIRONMENT

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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Other comments: THE TRAFFIC CONGESTION THAT THIS DEVELOPMENT WOULD BRING ABOUT IS HORRENDOUS. THE ADDITIONAL TRAFFIC TO AN OVER LOADED ROAD SYSTEM WOULD BRING ABOUT MORE ACCIDENTS & CONGESTION NOT TO MENTION THE POLLUTION EXCESSES.

17 The Lanes,
Leckhampton,
CHELTENHAM
Glos
GL53 0PU
26th November 2013

Dear Sirs,

REFERENCE: PLANNING APPLICATION 13/01605/OUT

I wish to object to the proposed development on the following grounds:

A. Given the evidence from the 2011 census and ONS projections on future housing needs in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing needs, traffic management, transport, schooling and other infrastructure have been properly resolved.
B. The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create even greater horrendous traffic queues in the peak periods. The planning application offers no solution to this grave problem. The traffic on the A46 is static in both directions in both rush hours at the moment. This is made even worse when the A417 is closed due accidents on Crickley Hill and the M5 closed due to accidents.
C. The suggestions to prevent overload and gridlock in Church Road are ridiculous and move the problem to Moorend Park Road and other residential streets in the near area which include a junior school.
D. My family would be affected by the health and accident risks from the traffic queues and pollution that would result from increased traffic flows.
E. My family and I greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill. I use the footpaths most days for exercise and to walk into Cheltenham.
F. The plan does take in the need for more primary and secondary school places as Bournside and Balcarras are both currently full and additionally Balcarras has no further land on which to expand.
G. I believe that no one has sat down and objectively estimated the housing needs of Cheltenham and have erred on the safe side of massive overestimation of the number of homes required. At the moment I cannot guess which employers can or will move into the area, and where in the area, to provide jobs to add value to the economy. The only jobs to be created will be to service a growing population.

[redacted]

JCS Team,
Municipal Offices,
CHELTENHAM,
GL50 9SA

BUILT
Recd 27 NOV 2013
ENVIRONMENT

17 The Lanes,
Leckhampton,
CHELTENHAM
Glos
GL53 0PU

26th November 2013

Dear Sirs,

REFERENCE: PLANNING APPLICATION 13/01605/OUT

I wish to object to the proposed development on the following grounds:

A. The traffic on the A46 is static in both directions in both rush hours at the moment. This is made even worse when the A417 is closed due accidents on Crickley Hill and the M5 closed due to accidents.
B. The suggestions to prevent overload and gridlock in Church Road are ridiculous and move the problem to Moorend Park Road and other residential streets in the near area which include Leckhampton School.
C. There are many examples of wildlife in fields around the area which would be destroyed if this development went ahead.
D. The local farmer would lose all his land from which he produces local meat products.
E. This area is vital for its open spaces where we exercise and dog walk.
F. The proposal is to build large family houses when there is a need for smaller properties/ flats for the elderly.
G. Bournside and Balcarras schools are full with the latter unable to expand as there is no land on which to expand.

Yours Faithfully,

[redacted]

JCS Team,
Municipal Offices,
CHELTENHAM,
GL50 9SA

Cheltenham & Tewkesbury Cycling Campaign

BUILT
Recd 27 NOV 2013
ENVIRONMENT

Please reply to:
[redacted]

Planning Department (ref 13/01605/OUT)
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
GL50 9SA

My reference P9/017

22nd November 2013

Dear Sir or Madam,

Planning application 13/01605/OUT
Kidnappers Lane, Leckhampton

We have the following observations to make on this proposed development.

1. We acknowledge and support the proposal for two new traffic signal junctions on Shurdington Road, the northern one of these being for exit from the development by buses and cycles only (where both modes should share the carriageway). This form of junction control will best assist cycling movements to and from the development and by controlling vehicular movements at these places will enhance safety.

2. We are concerned about the lack of a direct connection between the development and Woodlands Road as the latter road has considerable potential to provide good, low-traffic cycling routes, suitable for a broad range of people cycling, to a wide area of western Cheltenham, including GCHQ, the railway station, Bournside school, Morrison's supermarket and library in Caernarvon Road and local shops and services in Woodlands Road itself. However, the present right turns into and out of Woodlands Road are difficult for many people and are likely to be the weak link that deters them from cycling. We believe that this junction needs to be controlled at least for journeys between the development and

Cont'd

Woodlands Road but preferably in a way that also improves cycle access between Shurdington Road and Warden Hill more generally.

3. The development will extend the urban area of Cheltenham outwards on both sides of Shurdington Road and should increase the use of this road by pedestrians and cyclists, including children. In these circumstances and given the relatively narrow widths of both carriageway and footways along Shurdington Road, the 30 mph speed limit should also be extended, preferably to and including the roundabout junction with Up Hatherley Way.

4. Within the development it should not be necessary to provide separate facilities for cyclists (other than cycle parking), except perhaps through open space and parks and to provide cycle/pedestrian only links to surrounding roads. Certainly there should not be shared-use footways alongside roads as the roads should be designed to contain vehicle speeds and thus be suitable for sharing by cyclists of all kinds and ages. If and where paths for cycling are to be provided, they should be built as full-standard cycle tracks at carriageway level, with particular attention to sightlines.

5. All dwellings within the development should be required to provide cycle parking for residents and visitors. For dwellings without garages, high-security, covered cycle parking facilities should be provided close to main entrances, where they are at least as convenient to access as parking for cars.

6. We understand that an area-wide cycle audit has been carried out for this development. It should be used to inform the wider changes necessary to maximise cycle use by the new residents.

[redacted]

Secretary, Cheltenham & Tewkesbury Cycling Campaign

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 86 CINTRA COURT GL52 2XL

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

DCLP
Recd 28 NOV 2013
ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ...20 HAWKSWOOD DR., ALDEN HILL.....

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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BUILT
Recd 28 NOV 2013
ENVIRONMENT

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Other comments: .....

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Recd 28 NOV 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

(1) This land should not be developed ~~for~~ for housing but as a Local Green Space (as per the NPPF)

(2) The JCS fails to understand the importance of this area to the people of Cheltenham and its function in providing a green setting for the town

(3) It also fails to appreciate the need to protect the setting of the AONB which is in danger of being lined with near continuous development along much of its western edge

Name [redacted]

Ref. 13/01605/OUT

Address 30 Packnick Road, GL50 2HA

BUILT ENVIRONMENT
Recd 28 NOV 2013

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

This development is completely unacceptable in this location as the local infrastructure and roads are already at maximum capacity - the long queues along the Shurdington Road every morning & evening during the rush hour clearly demonstrate this.

This has also exacerbated the poor air quality in the area and more development will just increase the existing problems & inadequacies.

Name [redacted]

Ref. 13/01605/OUT

Address [redacted] CHELTENHAM

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 22 CENTURY COURT, MONTPELLIER GROVE, CHELTENHAM, GL50 2XR

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

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RECEIVED
29 NOV 2013
ENVIRONMENT

(d) I am personally affected / ~~deeply concerned~~ by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / ~~my~~ family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

The infrastructure in this part of Cheltenham was not designed to accommodate the urban sprawl that this development will create.

13/01605/OUT

Land at Leckhampton

Representations

Batch 9

Name .[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ..2 ARDEN ROAD CHELTENHAM GL53 0HQ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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BUILT ENVIRON
Read 1 DEC 2013

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Other comments: .....

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Name ....[redacted]..... **Ref: Planning Application 13/01605/OUT**

Address ....15 SOUTHFIELD CLOSE, CHELTENHAM.....

(include, delete or modify the following statements as appropriate)

BUILT....

I wish to object to the proposed development on the following grounds:

Recd - 1 DEC 2013

ENVIRONMENT

(a) Given the evidence from the 2011 census and ONS projections on future housing yield in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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Other comments: JCS estimates and solutions appear to be a "back of envelope" exercise and seemingly are seriously flawed.

The planning application should be vigorously opposed.

Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 7 Peregrine Rd Cheltenham GL53 0LW

(include, delete or modify the following statements as appropriate)

[redacted]

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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- 3 DEC 2013
ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Nam[redacted] **ef: Planning Application 13/01605/OUT**

Address .19 BLACKTHORN END LECKHAMPTON CHELTENHAM.

Rcvd - 3 DEC 2013

ENVIRO

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved. STRONGLY AGREE.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems. STRONGLY AGREE.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road. STRONGLY AGREE.

THESE ROADS ARE NARROW AND CANNOT BE WIDENED.

We are

(d) ~~I am~~ personally affected / ~~deeply concerned~~ by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~My~~ family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

THIS PLANNING APPLICATION HAS TOO MANY 'UNKNOWNS'. MANY OF THESE UNKNOWNS COULD HAVE SERIOUS CONSEQUENCES ON THE NATURAL ENVIRONMENT; THE EXISTING HOUSES AND PROPERTIES; AND THE PEOPLE ALREADY LIVING HERE.

[redacted]

Name [redacted] Page 1312 **Ref: Planning Application 13/01605/OUT**

Address 25 BRIZEN LANE, CHELTENHAM GL53

Rec'd - 4 DEC 2013

DEVELOPMENT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) ~~If~~ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: IT IS UNBELIEVABLE THAT THIS PLANNING ARGUMENT IS STILL GOING ON

Name [redacted] .... **Ref: Planning Application 13/01605/OUT**

Address 6, MERLIN WAY

BUILT
Rec'd - 4 DEC 2013
ENVIRONMENT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Moorend Park Rd already heavily congested will fare ruin as an attractive residential road and will have to cope with more skidding and accidents during spells of icy weather, as has already occurred

BUILT
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

We do not need or want this development on our green belt / green field sites — there are other more suitable areas. Brown field sites must be developed instead.

The Leckhampton site is highly valued for its much used recreational facilities. Such a large scale development would have adverse effects on traffic; wildlife; flooding; and would put undue stress on local amenities.

Consider what local residents want instead of developers and government demands.

Name [redacted]

Address 4 Chestnut Place, Leckhampton, Cheltenham, GL53 0QE.

Ref. 13/01605/OUT

BUILT
Recd - 4 DEC 2013
ENVIRONMENT

26 Mead Road
Cheltenham
GL53 7DT
26/11/13

Dear Sir.

OUTLINE PLANNING APPLICATION REF 13/01605/OUT
PROPOSED DEVELOPMENT AT KIDNAPPERS LANE, LECKHAMPTON

We write to object to the outline planning applicationto build 650 houses and other development on 33 hectares of land between Leckhampton and Shurdington Road, Cheltenham

We enclose a letter we have written to the JCS team objecting to the inclusion of this land for development within their plan. We feel that until the JCS plan has been finally approved it would be wrong to consider this outline proposal and it should be refused at this stage.

Our principal objections to the proposals are as follows:-

- The loss of valuable recreational land on the edge of Cheltenham
- The large increase in traffic on Shurdington Road which will arise;
- The increase in air pollution resulting from the increase in traffic;and
- The loss of attractive views from the top of Leckhampton Hill.

If, however, this proposal is accepted in outline, the Council should make every effort to ensure that the area retains its recreational value. For example, the developers should not be permitted to extinguish any rights of way and other well used paths and should not be allowed to enclose these within high garden walls or fences.To maintain some of the character of the land, trees and hedgerows together with some meadowland and allotments should be retained along the paths in order to break up the urban nature of the development.

Yours faithfully,

[redacted]

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13/01605/OUT

Land at Leckhampton

Representations

Batch 10

Nam[redacted]

Address [redacted] LECKHAMPTON RD, CHELTENHAM GL53 0QQ

Page 1320

Planning Application 13/01605/OUT

(include, delete or modify the following statements as appropriate)

BUILT
Recd - 9 DEC 2013
ENVIRONMENT

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments:

The traffic congestion on Church road is already very bad with room for a single line of traffic - this will be made far worse with the proposed development.

BUILT
Rcvd 11 DEC 2013
ENVIRONMENT

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE
13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

① Most households have at least one car and very often two so this would mean one THOUSAND or more vehicles driving on to SHURDINGTON ROAD.

② Air Pollution levels ALREADY BREAK EU level standard for CHURCH ROAD & SHURDINGTON ROAD in winter months

③ Traffic will swell CHURCH ROAD figures as motorists attempt to bypass the A46 bottleneck at MOORFND PARK ROAD LIGHTS and BATH ROAD. LECKHAMPTON Village (CHURCH ROAD) cannot cope with any more vehicles.

④ CBC must look again at alternative opportunities including a new site for CHELT F.C. Stadium near the RACECOURSE and use Whaddon Road to build houses inside the Town instead of Kidnappers Lane / Shurdington Road. N.B. RAIL travel to RACECOURSE Station will be possible via BROADWAY (&) and CBC ought to work towards restoring connection via LANSDOWN JUNC.

Name [redacted] Ref. 13/01605/OUT

Address 14 GREATFIELD DRIVE, CHARLTON KINGS

Ref: Planning Application 13/01605/OUT

Name [redacted] Page 1323

Address 23 GIFFARD WAY LECKHAMPTON GL53 0PW

BUILT
Recd 11 DEC 2013

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: The roads surrounding my home in Gyllard Way, Leckhampton are such that whenever I leave by car I have to enter Church Road. I find that access to Leckhampton Road is extremely difficult at peak times and not easy at other times. I do not believe that the suggestions made in the application will resolve this difficulty. Additional cars from the new houses will only make the problem worse.

Ref: Planning Application 13/01605/OUT

Name [redacted]

Address 40 MERLIN WAY CHELTENHAM GL53 0EA

Rec'd 11 DEC 2013 BUILT ENVIRONMENT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

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(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ORCHARD HSE., LECKHAMPTON LANE SHURDINGTON

(include, delete or modify the following statements as appropriate)

BUILT
Recd 11 DEC 2013
ENVIRONMENT

✓ **I wish to object to the proposed development on the following grounds:**

✓(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

✓(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

✓(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

✓(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

✓(e) I / ~~my family~~ greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I fear this is only the beginning of building on land between Cheltenham and Shurdington, the amalgamation of which is long term undesirable - the area would become a dormitory for Bristol, Birmingham Swindon.

Nam[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address 15 Nourse Close, Cheltenham GL53 0NQ

BUILT
Rec'd 11 DEC 2013

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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Name [redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address GREEN ACRE KIDNAPPER LANE CHELTENHAM GL53 ONP

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overloading and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

BUILT
11 DEC 2013
ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

(f) I am personally affected by the risk of flooding.

Other comments: .....

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BUILT
Rcd 11 DEC 2013
ENVIRONMENT

Name [redacted]

Address 2 IRELANDS DRIVE, LECKHAMPTON, CHELTENHAM

Ref: Planning Application 13/01605/OUT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) ✓ Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) ✓ The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) ✓ The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

BUILT
Recd 12 DEC 2013
ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Just the other day there was an accident on Shurdington Road causing it to be closed. It caused total mayhem through out Cheltenham, as a driver it took me over 1 hour to get from Treelands Drive to Hendon Road. Can you Imagin what it will be like with all these added houses plus the pollution.

I do hope Chelt Borough council is well Insured for all the claims that will be coming in.

Nan[redacted] ..... **Ref: Planning Application 13/01605/OUT**

Address ...8 Brizen Cove, Cheltenham GL53 0NG

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

BUILT
Recd 12 DEC 2013
ENVIRONMENT

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: The Roads in qestion are already over loaded Any more traffic will no doubt lead to accident fatalities. Myself and my family use the Feilds in qestion alot. Please dont destroy them.

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 12 Waterford Court, Moorend Park Rd Cheltenham GL53 0LA

(include, delete or modify the following statements as appropriate)

BUILT ENVIRONMENT
13 DEC 2013

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am ~~personally affected~~ / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / ~~my family~~ greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: Leckhampton Hill should stay green for landscape and history - it was where the people of the Stone Age lived and it should be stay green in the future.

34a Pilley Lane
Leckhampton
Cheltenham
Glos. GL53 9ER
12/12/2013

BUILT
Recd 13 DEC 2013
ENVIRONMENT

APLICATION REF.No. 13/01605/OUT

Dear Sir/ madam,

Planning applications should **NOT** even be considered in respect of the countryside on the lowest slopes of the Cotswold escarpment - Leckhampton to Shurdington. I propose a ruling: **That future applications in respect of this Green belt land are simply not allowed** - for the reasons below - and many others.

Green belt land (and AONB) - everyone has forgotten that land given this status in the past MUST remain green & UNSPOILT.

The woodlands, streams/wetlands and ancient hedgerows are just too precious to be lost !

These habitats - are HOME to many species of wildlife - fauna and flora and must not be destroyed for **ANY (£)** reason.

ALL of these ANIMALS & PLANTS have as much right to this land as we have. In situations like this they are of such small consideration - yet we all recycle & talk about reducing our carbon footprint ! Building more unnecessary housing is the priority - WHY ? - I think I know the answer - £ - is it not !

Enclosed is a recent edition of 'Home Buyer' from the Echo - so we need even more houses for sale - Do we really ?

There has been almost total opposition to the possible destruction of this GREEN BELT LAND. **You are not listening.**

If you let building go ahead on this land I hope you can live with yourself.

All of you PLEASE THINK LONG AND HARD.

[redacted]

Born in Hatherley, Cheltenham 1957. Now living and working in Leckhampton.

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13/01605/OUT

Land at Leckhampton

Representations

Batch 11

Name [redacted]

Address 15 Collum End Rise, Cheltenham GL53 0PA

Ref: Planning Application 13/01605/OUT

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

Recd 13 [illegible] 2013

EN

(d) I am personally affected / ~~deeply concerned~~ by the health and accident risks from the traffic queues and pollution that would result from the Proposed development.

(e) ~~My~~ my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: I cannot see how houses can be built locally without making the traffic situation at peak times worse + affecting residents' ability to travel too. Many parents at Leckhampton Primary School refuse to let their children walk to school alone because of dangers from the traffic. Our eldest daughter was unable to get a place at local ~~secondary~~ comprehensive schools because they were full, where will new residents send their children? This causes much stress for parents

Name [redacted]

Address 7 Hillary Road, Cheltenham, GL53 7LB

Ref: Planning Application 13/01605/OUT

BUILT
Recd 16 DEC 2013

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments:

With Thanks for considering these concerns.

Season's greetings!

Ruth Kemp.

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

This is a very special area to all the locals We have said 'NO' until we are blue in the face

NO NO NO

BUILT
Rec'd 16 DEC 2013
ENVIRONMENT

Name [redacted]

Ref. 13/01605/OUT

Address 26 Merlin Way GL53 0LH

BUILT
17 DEC 2013
SCANNED

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER (BUT probably to January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I believe this proposal is completely inappropriate for a site so close to the AONB. Living less than half a mile from the site I am not allowed to extend my house because it falls within the AONB so how can it be permissible for such a development to totally change the character of the area? In addition the whole area is already under huge strain from traffic and congestion without an extra 650 dwellings.

Name [redacted]

Ref. 13/01605/OUT

Address Broadclyst, Church Rd, GL53 0QJ

Name [redacted] f: Planning Application 13/01605/OUT

Address [redacted] LANE CHELTENHAM GL53 CNR

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved.

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems.

(c) The suggestions made in the application for preventing traffic overload and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road.

17 DEC 2013

[redacted]

(d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

Other comments: .....

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13/01605/OUT

Land at Leckhampton

Representations

Batch 12

Maladministration of the Leckhampton JCS Allocation (A6) (Application **13/01605/OUT**) v.01 11-7-14

1
CBC has now scheduled the 'core' planning application (13/01605/OUT) for the proposed JCS strategic 'Allocation' at Leckhampton (A6) for **determination** on 31-7-2014.
To have done so is premature and unjust for the following reasons.

1.1
CBC has not addressed the **Leckhampton 'Local Green Space' (LGS) application**, which it received not just eleven months ago (from the Parish Council) but 17 months ago from Martin Horwood MP. Cheltenham's officers have simply **chosen not to progress** that fully documented LGS application - other than (and only very recently) by proposing some **framework/methodology** whereby LGS applications might be considered, (effectively a stalling-device given the final emergency of Leckhampton).
There currently exists only the **one** LGS application: for urgent, application-threatened Leckhampton, (and in the foreseeable future there might at most be another for the North West UE).
Accordingly, 'methodology' could be developed initially in parallel with doing the Leckhampton LGS assessment and consultation, not be used as an excuse to shelve it.
This is **dilatory, grudging 'evasion of engagement' by CBC officers** with what is the key issue identified by the Planning Inspectorate for the Leckhampton land, namely its landscape and amenity contributions.

The **Leckhampton LGS application will be fatally prejudiced by any discussion of this planning application**, (where the full landscape analysis cannot be presented and assessed).

1.2
Strategic infrastructure evidence, notably transport but also schooling (especially secondary), is still incomplete/missing from the JCS Evidence Base.
This application's transport 'evidence' is not strategic for the entire A6 Allocation, because it does not address e.g. the further 370 houses recently proposed by Redrow, nor the unknown number which may follow between Kidnappers Lane and Farm Lane. Yet these **accesses** need to be linked and be compatible both with each other and with the character of the two 'rural' lanes, Kidnappers Lane and Farm Lane.

Absent infrastructure evidence amounts to **'unsoundness'** of attempting any decisions now.
Accordingly, the planning application is incomplete and invalid.

1.3
Until it has been properly decided whether this heavily contested JCS (which has received a startling 4,000+ Objections by the most recent consultation, most of them concerning South Cheltenham) is 'sound and appropriate', or not, **it is entirely wrong to try to run just one of the strategic Allocations past a planning committee**.

The current 650-houses planning application represents nearly 60% of Leckhampton's 1125 strategic total, and it occupies the key (townward) site which will determine whether or not the entirety of the Allocation is viable, including its road access onto the A46 (Shurdington Road). If given any assent it will precipitate the rest of the Allocation, prematurely.
The recent decision by developers of A6 to split the application into three sections is tactical, and should not be facilitated by officers.

CBC cannot make a fully informed and fair decision on this strategic-scale application until all the inter-linked strategic evidence (accesses; transport infrastructure; secondary schooling; LGS extent) has been published and then properly examined.

1.4
There is **no clearly stated or compelling need for this haste at A6** (Leckhampton).

Having stayed within the JCS alliance, Cheltenham does incontestably have a (joint) "5 year housing land supply", and CBC officers should therefore not be hurrying Leckhampton forward prematurely.

1.5
It is reported that Tewkesbury lead councillors have resisted, indeed "refused", to accommodate Cheltenham's unanimous Full Council vote on 28-2-14 seeking to exempt Leckhampton as a strategic allocation in the JCS. The resolution directed JCS officers to "***reconsider the status of Leckhampton and Up Hatherley as strategic sites*** *within the JCS and explore the possibility of* ***withdrawing these locations***".

Up Hatherley, (which was wholly unsound due to eroding this Green Belt at a narrowest gap, was then withdrawn.
Withdrawing Leckhampton now remains very easily doable, and very wise both environmentally and infrastructure-wise for Cheltenham as a whole.

Only an isolated and remote 20% (roughly) of the Leckhampton land lies in Tewkesbury District's parish of Shurdington, (due to recent boundary tidying, although historically these fields were all in Cheltenham's parish of Leckhampton). Accordingly, the fate of the Leckhampton land, i.e. whether it should continue to be a "green wedge" of countryside from the Cotswold eminence of Leckhampton Hill, extending inwards to almost touch the historic Regency town (at The Park), **all that choice should be entirely Cheltenham's**.

This is Cheltenham's only remaining and best **'green wedge'** candidate. A 'green wedge' penetrating into a town, as do the 'Strays' in York, maximises the urban periphery bordering and accessing that countryside, thereby gaining **"high doorstep amenity"** from it. This immediately benefits Leckhampton, Allenfield, The Park, Warden Hill and parts of Up Hatherley.

In an earlier document **'140403 SaveGreenfield.pdf' (re-attached herewith)**, submitted to the JCS Member Steering Group (MSG) I challenged Tewkesbury's truthful numerical **need** for any of the housing allocation at Leckhampton, as the houses would be more distant from their main centres of population growth; **see the table and calculations in section 6** of that document.

This shows that Tewkesbury has only needed a combined allocation of **255 units** in the two UE's located on Cheltenham's periphery. If this 255 were split in proportion to the proposed size of the two UEs, then Tewkesbury's 'stake' in their site off Farm Lane Leckhampton amounts to **less than 50 houses**, which is insignificant justification for Tewkesbury's dogged refusal to allow Cheltenham to decide what is wise for Leckhampton and the town's overall.

Redrow has now bought these three fields in Tewkesbury District from the previous developer and has upped their proposal to a ludicrous 370 houses, to be accessed off (unviable) Leckhampton Lane and to be sited closest (of all the A6 development) to the Cotswold Escarpment, precisely where TBC's own Local Plan Inspector ruled in 2003 that it would be visually damaging.
The Inspector found that:
"the site forms part of a swathe of open land that sweeps down from the Cotswolds to pass between Cheltenham and Gloucester and it provides a link between the AONB and the Vale of Gloucester", and that *"visual impact on the surrounding countryside would be very significant and ... could not be easily mitigated"*.

Cheltenham's representatives have simply swallowed baseless arguments from a more assertive TBC planning team.

Tewkesbury's planning lead councillor, Derek Davies, even managed to get his **two** sites (Highnam South and then Highnam North), both **non-GreenBelt**, removed from the JCS Draft last autumn.
Cheltenham has not resisted accommodating that Tewkesbury 'choice'. Gloucester resisted but only weakly, because frankly this JCS already gives Gloucester all its preferences.

1.6
The principal **injustice to the local community** is the likelihood of giving any minor or major concession or 'indication' to this developer, which will not be recoverable by any subsequent JCS review or by any appeal by objectors, and will therefore prejudice this particular greenfield's well merited case for escaping strategic-scale development.

It is agreed that the JCS numbers may be revised downward before Submission, and CBC Full Council has indicated by its unanimous resolution on 28-2-14 that its remaining priority is the removal of Leckhampton as a strategic allocation. Therefore it is devious behaviour by pro-development officers to run Leckhampton prematurely to a planning determination, doubtless stressing all the attendant 'scares' of appeal consequences and costs, and the New Homes Bonus, albeit they are largely empty scares in this case.

The planning officer's recommendation will be 'Permit', as officers fear for their position in an autocratic hierarchy determined to retain 'inflated targets'. The supporting arguments will be specious, and will be disclosed late, to make it as hard as possible to dismantle them and gain councillor attention for that refutation.
All this railroading is now sadly standard practice by an unchallengeable administration.

1.7
NPPF provisions, very relevant to Leckhampton, have been disregarded with apparent impunity by CBC (and by the JCS officer team).
Leckhampton's *"local people"* (two Parish Councils; ward councillors; Leglag with its huge membership) have certainly not been *"put in the driving seat of decision making in the planning system"* as the recent DCLG Statement on the NPPF advises. On the contrary they have been essentially ignored, unjustly, by Cheltenham's supposedly professional and impartial senior officers (with the assent of an impregnable Cabinet).
No Local Plan has been progressed, despite cries for it (and its valuable landscape designations, e.g. LGS); yet an 'undermining' planning application has been progressed, following lengthy pre-application negotiations with developer RPS.

Cheltenham's LibDem Cabinet has been persuaded (or else instructed by national HQ) to inflate the housing targets, knowing that this incaution over a 20 year period amounts to a **'greenfield first' policy**.

The above reasons demand that the Leckhampton 'strategic' application be deferred, not only as a planning application but also from the JCS Pre-Submission Draft.

CBC has not considered and resolved all these issues of prematurity and justice .
Therefore CBC must CANCEL the 31st July special planning meeting, and now has three weeks in which to do.

If contested, then all these points of objection need to be answered in detail, not tersely dismissed.

2
If the applicant were to go to appeal for non-determination, then all the above arguments will apply very strongly.
Accordingly, it is very obvious that the applicant will not hasten to appeal.

Moreover the land's best chance of a fair assessment has always been with external adjudicators, notably the 1993 Local Plan Inquiry Inspector, who walked the land in July and viewed it from the Escarpment. (Cheltenham planners and councillors have always undervalued both the buildings and the setting of this nationally important 'most complete Regency town', which was so richly endowed that local representatives have felt it could be endlessly eroded.)

Nor is there any likelihood whatsoever of costs being awarded against a very logical deferment on prematurity grounds.

Development agents RPS have pushed Leckhampton early, calculating that their best (perhaps only) chance of circumventing the "landscape and amenity" merits of this site (confirmed by Local Plan Inspectors' verdicts) is to wheedle Cheltenham's planners and current councillors, e.g. in a private meeting. However, the controlling landowner of this entire 650-unit block is the Gloucester Diocese, (lands which were given to the parish to support the rector).
(Bovis owns merely Lott Meadow, but failed decades ago to get building permission for that field alone, with the result that it is now long-accepted that Lott Meadow with its key 'walk to the hill' is not proposed for development.)

Not only should there be no premature haste to a planning determination, but A6 (Leckhampton) needs to be deferred from the JCS as a strategic allocation until the LGS application has been determined.
Leckhampton's presence as A6 in the JCS Pre-Submission Draft will render that Submission unsound, as will be elaborated fully.

The 1993 Local Plan Inquiry (LPI) Inspector ruled expressly in his Report (paragraphs 6.86 to 6.108) that, in the case of Leckhampton, such prime greenfield ought on merit to be preserved **ahead of** the Green Belt at Cheltenham North West.
The Inspector wrote:
"I believe that it would be very sad indeed if development were to proceed at Leckhampton, with its variety and interest, whilst Swindon Farm remained inviolate simply because of its present green belt status".

Essentially little has changed in 21 years, apart from some misguided expediency, which can still be avoided. Nothing has occurred which could modify the above Inspector's recommendation.

Save for a very dramatic reduction in overall JCS housing totals, Cheltenham's **North West** strategic allocation (currently set at 4,800+ homes) is unfortunately too large to be saved from all development. Such a large UE can easily accommodate a few hundred moved from Leckhampton. There is adequate developable space already 'safeguarded' for development further out towards the M5.
Furthermore, it is far more cost efficient to provide the necessary infrastructure (roads and secondary school) in one location rather than two.

Furthermore, there is some real chance of **'affordable housing'** being delivered in the NorthWest UE, far more than in Leckhampton where a developer will be able to argue (at 'full' application and at appeal) that land itself and the necessary landscaping/infrastructure costs are proving too expensive to be able to afford a high percentage of low-cost housing.

Leckhampton is simply more valuable in "landscape and doorstep-amenity" terms than any of the JCS Green Belt allocation sites.
That is the dispassionate finding of landscape quality which needs to be respected, regardless of all local political horse-trading.

In this context of ongoing JCS revisions, there is no need for any 'opinion' from a planning committee **yet**.

Such an opinion might be sought IF the applicant were ever to proceed close to an appeal hearing on non-determination grounds, (by which time the JCS will be more advanced).

Cheltenham's equation is very simple: Leckhampton **easily CAN** and **should** (on merit) be saved.

This is still very possible, despite the disgraceful insensitivity of CBC officers who have wasted the past 21 years by failing to follow-up the Inspectors' rulings with any landscape designation for Leckhampton, and now more recently by their unyielding determination to deposit a UE on the land, (for expediency or worse), but without any all-round justification which could withstand independent examination.

3

Although the Leckhampton fields happen not to have been designated Green Belt, (because they are not directly between Cheltenham and Gloucester, i.e. forming a 'coalescence' risk), they have more intrinsic landscape and amenity merit than any of the other proposed Green Belt locations chosen for urban extensions.

The 1993 Cheltenham Local Plan inquiry 'saved' Leckhampton (specifically in preference to Green Belt at North West Cheltenham) solely on landscape and amenity grounds, in the Inspector's fine four-part phrase, that the land should be protected:
"because of its varied topography, landscape history, dense network of footpaths and pedestrian access from several residential districts".

In 1992, as then Planning Casework Secretary of Cheltenham Civic Society, I presented evidence which 'saved' Leckhampton from "white land" development risk.
That thorough and decisive Local Plan Inspector's Report, which all subsequent Inquiries in Leckhampton have respected, is curiously not available on the JCS 'Evidence' website.

GCC owns four fields in the Leckhampton allocation, all lying **South and West** of Kidnappers Lane, i.e. beyond the 650 houses site. However, just like GCC's essentially abdicated infrastructure role for the JCS, GCC remains a very quiet 'headless chicken' for now, failing even to have given any impartial lead on **landscape designation** (because that would impact a few fields it owns).

RPS's outline application for **650** houses (**plus** school, plus shops, plus pharmacy, plus surgery; **plus** some of: "care home", "dentist", "nursery", "cottage hospital"), all on a site solely **North and East** of Kidnappers Lane, is excessive even in the context of the already excessive (recently JCS-horse-traded up) total of **1125** for Allocation A6.
RPS ventures a figure of "200" for the GCC land, which adding the 370 now proposed by Redrow makes a total of **1220 houses** (plus all the land for other uses), **greatly exceeding the 1125 in the current JCS Draft**.

The treatment of the 'rural' character of Kidnappers Lane all needs to be assessed comprehensively not piecemeal within A6, and to ensure maintenance of the noted recreational **"footpath network"** and all other linkages off/across the lanes.
Once development starts off Shurdington Road, there is no defensible boundary (**in the absence of a LGS conclusion**) to prevent development encroaching southward all the way to Church Road.

There is no need or justification for an outline permission at this sensitive location.

If the JCS is allowed to run its course through EiP, then especially with the emerging ONS and DCLG revised projections, Leckhampton could and would come out as a strategic allocation.

That of course is why CBC senior officers are arranging to scupper it prematurely, **before it can benefit from proper scrutiny through the independent EiP process,** or even through the next round of revised totals**.**

Name [redacted] **Ref: Planning Application 13/01605/OUT**

Address 26 Greenfield Ave, Up Hatherley, Cheltenham GL51 3QQ

(include, delete or modify the following statements as appropriate)

I wish to object to the proposed development on the following grounds:

(a) Given the evidence from the 2011 census and ONS projections on future housing need in Cheltenham, this proposed development is unnecessary. The application is premature and must not be permitted until the JCS is finalised and the big uncertainties over housing need, traffic and transport, schooling and other infrastructure have been properly resolved. ✻

(b) The traffic congestion created by this development together with the other proposed developments south of Cheltenham would create horrendous traffic queues in the peak periods. The planning application offers no solution to the grave traffic problems. ✻

(c) The suggestions made in the application for preventing traffic overloading and gridlock in Church Road are tenuous. They are likely to promote accidents and even if they work they will cause big traffic increases elsewhere, such as in Moorend Park Road. ✻

✻ As exemplified by the detailed analysis undertaken by Leckhampton with Warden Hill Parish Council in their response dated 27 February 2014.

PTO.

#

I am pleased to note CBC's recent vote to reconsider the inclusion of development at Hatchampton Lane in the Joint Core Strategy. This planning application is therefore highly premature and should be rejected.

(d) I am personally affected / ~~deeply concerned~~ by the health and accident risks from the traffic queues and pollution that would result from the proposed development.

(e) I / my family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LWWH and Shurdington Concept Plan for preserving the land as a Local Green Space for its amenity value, footpaths, landscape, wildlife, history and impact on views from Leckhampton Hill.

(f) I am ~~personally affected~~ deeply concerned by the risk of flooding.

Other comments: 1) I use the A46 regularly to work in Gloucester, I also cycle on this road regularly. The traffic is severely congested at peak times, and pretty appalling at other times of day too. It would be gridlock / queues a bad for economy if dev. goes ahead.

2) As a member of the local Lib Dem Team, ~~and~~ calling on local residents regularly, I saw at first hand in January the dreadful effects of flooding from the other side of the A46 on homes / gardens in Hawthorn Road. (See Glos Echo, 8 Feb). The heavy rains caused so much water to build up in a resident's garden, that her home was almost flooded again as it was in 2007. PTO

The flood alleviation scheme completed in 2010 has not addressed issues surrounding the A46 towards Cheltenham, caused by either the main tributary (as opposed to the South-West tributary) of Hatherley Brook, or underground water flowing to Warden Hill under the A46. If climate change continues to create periods of heavy rain as seems likely, the risk of flooding here will continue to increase. I am not convinced that the plans for this development address this adequately; moreover the development would preclude the installation of further flood alleviation schemes on the Leckhampton fields which may become necessary in the future.

[redacted]

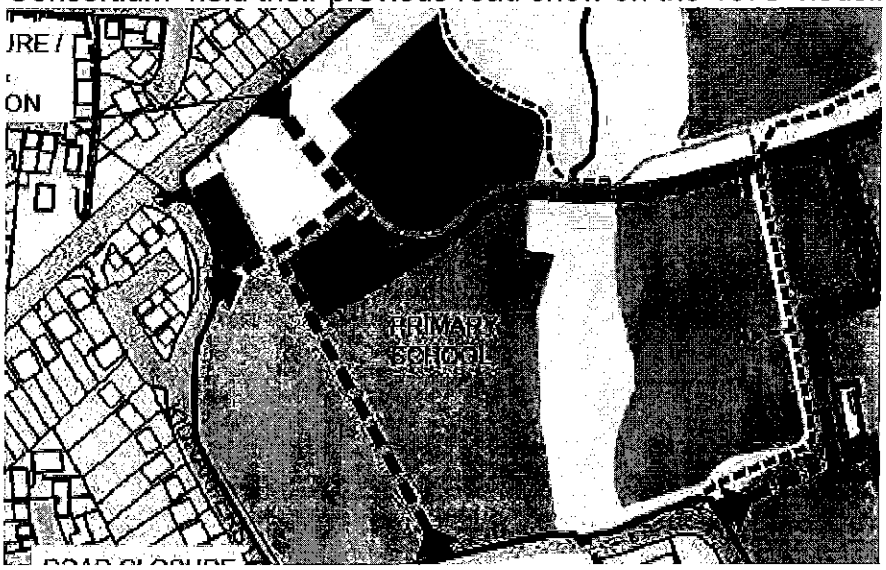
From: Internet - Built Environment
Sent: 29 November 2013 11:06
To: Internet - Planning Comments
Subject: FW: 13/01605/OUT

-----Original Message-----
From: [redacted]
Sent: 29 November 2013 10:41
To: Internet - Built Environment
Subject: 13/01605/OUT

I recently attended the public meeting held on the 27th November in Leckhampton and wish to raise specific objections to this proposal (in addition to my comments submitted on the JCS).

A primary objection (and running theme) is that this phase 1/piecemeal application allows the developers to jump the gun on the JCS process, but more importantly - potential decisions on this application only need to consider the impact (e.g. traffic; pollution; flooding) of these 650 homes and the 350 homes off Farm Lane (SE2?) AND NOT THE POTENTIAL IMPACT OF FURTHER DEVELOPMENT.
What if planning was approved and revised traffic/access was built - then further developments took place and the entire traffic situation collapsed?

From the 27th meeting, I could see that the traffic plan had not changed from when the Consortium held their previous road show on the 1075 housing proposal



at this time - I questioned the positioning of the Primary School (along with the other proposed retail/industrial facilities) .....on a bend of the main thoroughfare into the proposed estate/bus route/revised Kidnappers Lane routing.
It is totally illogical as regards traffic planning to locate such facilities as shown on the plan, due to the 'mum and dad car drop off fixation (as experienced by anyone driving pass a primary school between 8.15 - 9.00 am and again during the afternoon closing). To claim that all the children will be walked to this school is nonsensical and would go against the experience of all of us attempting to drive pass any school at opening/closing times!

Secondly, the plans still do not address the traffic situation of the 'single lane' constraint of Farm Lane as it narrows and approaches Crippets crossroad.

this proposal should not be approved.

[redacted]
3 The Spindles
Leckhampton
Cheltenham
GL53 0QD
[redacted]
[redacted]

BUILT
ved - 6 FEB 2014
ENVIRONMENT

Robinswood
Kidnappers Lane
Leckhampton
Cheltenham
GL53 0NP
Feb 3.

C. Hemphill
Planning Dept.
Cheltenham Borough Council.

'Leave Leckhampton as it is.' Are the people who support this aware of the state of the land? Apart from one admirable young tenant, most of the holdings are sitting idle and the land has not been maintained. Examples of this are unruly hedges reaching for the sky, fields of dead, uncut hay and areas of considerable decrepitude.

The main owner of the land, Glos. Diocese, is unwilling to pay for any maintenance whatsoever. Under these present conditions a vacuum will be created and nature will take over.

In these circumstances I can think of at least a couple of unpleasant eventualities the like of which would be greatly unpleasant to those living nearby.

Development would at least provide some of the much needed housing and allow the land to eminate its neighbours.

Yours sincerely

[redacted]

[redacted]

From: [redacted]
Sent: 08 December 2013 16:51
To: Internet - Planning Comments
Subject: Planning application 13/1605/OUT

Subject: Planning application 13/1605/OUT
Spring Hill
Crippetts Lane
Cheltenham
GL51 4XU

Dear Planner,
I have lived at the Crippetts for over 25 years. Initially the view from the hill was quite rural, but over the years it has been affected by the new housing and super store in Up Hatherley. The proposed development would be yet another change which doesn't, in my opinion, improve the view which is there for everyone, not just those who live here.
Most of my journeys are by bicycle and I cycle daily in Farm and Church Lanes to the Cheltenham shops or on recreational rides. I don't think that these lanes and Church Road and the A46 will be able to cope with the likely increase in motor traffic. Nor do I see any solution to this problem in the planning application. I think that cycling in the neighbourhood will becomes less pleasant and safe.
A particular problem twice a year is the low sun in the south west. This is in line with sections of Church Road making sufficient visibility at motoring speeds difficult. More traffic might well increase this danger and the police and the courts seem to regard it as just one of those things.
Try this link, for just one example of a cyclist's death.
http://www.dailymail.co.uk/news/article-2511334/Author-killed-cycled-country-road-female-driver-dazzled-winter-sun.html

If Leglag's claims about the 2011 census and ONS projections are correct, then I agree with them that this development is unnecessary.
Any predictions of the future are uncertain. This is particularly so now of population growth because of the effect the Scottish and the possible EC referenda could have on free movement within Europe. If young people really are as obese as we are told, then this and the possibility of antibiotics becoming less effective could also have an impact. Increased demand for food by the so called emerging economies add to the uncertainties. I think it premature at this time to be building on what could revert to being farm land for food or bio fuel production while still remaining a recreational green space.
Yours faithfully,

[redacted]

[redacted]
9 Imperial Square
Cheltenham GL50 1QB
email [redacted]

3 March 2014

Cheltenham Borough Council planning@cheltenham.gov.uk
Joint Core Strategy Team info@gct-jcs.org

Reference 13/01605/OUT.

I wish to register my opposition to the proposals from Curtin & Co (acting on behalf of Bovis and Miller Homes) for 650 new homes (plus additional facilities) on Leckhampton land between Shurdington Road, Church Road and Kidnappers Lane.

My concerns relate to the specific application (see below), but also to the way in which the Joint Core Strategy is now being used as a principal justification for developments of this kind. As you will know, the central driver for the Joint Core Strategy is the estimated need for a further 10,800 new homes between now and 2031, whereas the ONS has assessed the level of housing need at 6,070. There is a world of difference between these two estimates.

The proposal itself is so deeply flawed as to beggar belief, given the degree to which that number of new homes in that location will cause very significant knock-on problems, in the following respects:

[1] Congestion on the A46. I have seen the proposals to reduce congestion on the A46, and can hardly believe this is considered by the developers to be an adequate mitigation of the proposal. If the proposal to consent a further 1,500 homes in Brockworth is accepted, it would create a massive problem for all those who depend on the A46 as their principal artery in and out of Cheltenham.

[2] It's not just the congestion: it's all the emissions that all those additional vehicles will produce. As you will know, the EU is now intent on holding the UK much more rigorously to account for its continuing infractions against the EU's Air Quality Directive. This new development will make a bad situation in Cheltenham a great deal worse.

[3] It would appear that very little consideration has been given to the impact of this development on the provision of school places, not just (in the first instance) at Primary level, but at the Secondary level somewhat down the line. Surely there should be an agreed strategy for educational provision before any huge new housing developments of this kind are approved?

[4] On balance, it's hard to believe this proposal has been advanced in the spirit of the coalition government's Localism Act. As I understand it, there is now a proposal from the Leckhampton with Warden Hill Parish Council that the Leckhampton Fields should be protected as a Local Green Space of special community value.

In the spirit of true localism, I sincerely hope that this proposal from the Leckhampton and Warden Hill Parish Council will be given proper consideration before consideration of the housing proposal is allowed to proceed.

Yours sincerely

[redacted]

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APPLICATION NO: 13/01605/OUT		**OFFICER: Mr Craig Hemphill**
DATE REGISTERED: 17th September 2013		**DATE OF EXPIRY:** 7th January 2014
WARD: Leckhampton		**PARISH:** Leckhampton With Warden Hill
APPLICANT:	Bovis Homes Limited & Miller Homes Limited	
AGENT:	Joe Murphy	
LOCATION:	Land At Leckhampton Shurdington Road Cheltenham	
PROPOSAL:	Residential development of up to 650 dwellings; mixed use local centre of up to 1.94ha comprising a local convenience retail unit Class A1 Use (400sqm), additional retail unit Class A1 Use for a potential pharmacy (100sqm), Class D1 Use GP surgery (1,200sqm,) and up to 4,500sqm of additional floorspace to comprise one or more of the following uses, namely Class A Uses, Class B1 offices, Class C2 care home, and Class D1 Uses including a potential dentist practice, children's nursery and/or cottage hospital; a primary school of up to 1.72ha; strategic open space including allotments; access roads, cycle ways, footpaths, open space/landscaping and associated works; details of the principal means of access; with all other matters to be reserved.	

Update to Officer Report

1. SUGGESTED CONDITIONS

1 Approval of the details of the layout, scale, landscaping and external appearance (hereinafter called "the reserved matters") shall be obtained from the Local Planning Authority in writing before any development is commenced.

Reason: This is an outline permission only and these matters have been reserved for the subsequent approval of the Local Planning Authority.

2 The development shall be started on or before whichever is the later of the following dates:-

(a) Five years from the date of the outline permission;
(b) Two years from the date of this decision.

Reason: To enable the Local Planning Authority to review the development should it not be started within the time specified.

3 The development hereby permitted shall be carried out in accordance with drawing numbers 2186.09A; 2186.17C; 2186.31; 2186.30; 2186.32; 2186.33 and 2186.40.

Reason: To ensure the development is carried out in strict accordance with the approved drawings.

4 Prior to the submission of any Reserved Matters, a Phasing Scheme shall be submitted to and approved in writing by the Local Planning Authority. The approval of the details of the reserved matters shall be obtained from the Local Planning Authority in writing in relation to each phase before development of that phase commences. Development

shall thereafter be carried out in accordance with the approved details unless a variation is approved in writing by the Local Planning Authority.

The phasing scheme shall indicate the order and approximate timescales of:

- Site remediation, development phases (including the numbers of open market dwellings, and numbers, sizes and tenure of affordable housing units in each phase); and
- The provision of highway and drainage infrastructure; bus routes; utility infrastructure; landscaping including strategic landscaping; open space and recreation facilities; safe routes to school; and pedestrian and cycle route connections

Reason: To adequately manage the delivery of the site against supporting infrastructure.

5 No development layout shall be submitted until full drainage details, incorporating sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development, have been submitted in to and approved in writing by the Local Planning Authority. The drainage details shall include maintenance and adoption arrangements and shall be implemented in accordance with the approved details.

Reason: To provide water quality benefits, ensure that the new development does not increase the risk of flooding to the site itself or adjacent existing developments, and ensure adequate maintenance of drainage features.

6 Each application for reserved matters approval shall include a statement detailing how the application complies with the design principles established in the Design and Access Statement and addendum (April 2014) and any revisions agreed in writing by the Local Planning Authority.

Reason: To ensure compliance with the Design and Access Statement and ensure a satisfactory form of development and in the interests of the character and appearance of the area.

7 Details of the planting scheme will be submitted as part of the reserved matters, which shall generally be in accordance with the Green Infrastructure Strategy, as amended, shall be submitted to and approved in writing by the Local Planning Authority.

The submission shall include the following:

(i) Measures proposed for the protection of existing trees and hedgerows during construction including protective fencing in accordance with BS5837:2005.
(ii) an Arboricultural Method Statement in accordance with BS5837:2005 in relation to development within the root protection areas indicated on drawing no [Insert ref]to include no dig construction for access roads and car parking spaces or fires.
(iii) Details for trees to be planted including species, size, planting specification and root type.
(iv) The arrangements for management, including maintenance schedules and arrangements for the replacement of trees that are removed, uprooted, destroyed, die or become seriously damaged or diseased within five years of planting.

(v) Details of phasing arrangements.

Development shall thereafter be carried out in accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the provision of an appropriate landscape setting for the development in the interests of the character and appearance of the area.

8 Applications for approval of reserved matters pursuant to conditions 4 and 6 shall include inter alia details of the proposed facing materials and roofing materials, which shall be in general accordance with the Design and Access Statement and revisions thereto approved in writing by the Local Planning Authority. The development shall thereafter be carried out in accordance with the approved details.

Reason: To ensure a satisfactory form of development in the interests of the character and appearance of the area.

9 Applications for approval of reserved matters pursuant to conditions 4 and 6 shall include inter alia details of the specification and location of all hard surfacing materials, which shall be in general accordance with the Design and Access Statement and revisions thereto approved in writing by the Local Planning Authority. All new hard surfacing areas shall be formed from permeable materials or provision shall be made to direct run-off from the hard surface to a permeable or porous area (soakaway) within the site. The development shall thereafter be carried out in accordance with the approved details.

Reason: To ensure a satisfactory form of development in the interests of the character and appearance of the area.

10 Applications for approval of reserved matters pursuant to conditions 4 and 6 shall include inter alia full details of the design, materials, colour and finish of the proposed external windows (including cills) and doors, which shall be in general accordance with the Design and Access Statement and any revisions thereto approved in writing by the Local Planning Authority. The development shall thereafter be carried out in accordance with the approved details.

Reason: To ensure a satisfactory form of development in the interests of the character and appearance of the area.

11 Applications for approval of reserved matters pursuant to conditions 4 and 6 shall include inter alia details of all boundary treatments, screen walls and fences, which shall be in general accordance with the Design and Access Statement and revisions thereto approved in writing by the Local Planning Authority. The development shall thereafter be carried out in accordance with the approved details.

Reason: To ensure a satisfactory form of development in the interests of the character and appearance of the area.

12 The reserved matters submissions shall include details of the layout of estate roads, including routes suitable for refuse collection vehicles, and on-street parking to be laid out and constructed in accordance with approved details, including means of surface water disposal; street lighting; and signage to be submitted to and approved in writing

by the Local Planning Authority. No buildings hereby approved shall be occupied until the access roads to dwellings from the existing highway, including associated footways, cycle ways and turning heads, which serve the buildings have been laid out in accordance with those approved details and phasing scheme, and constructed to at least base course level.

Reason: To ensure that the access roads are completed to a standard suitable for occupants of the dwelling, in the interests of highways and public safety.

13 The reserved matters submissions shall include details of secure cycle storage and bin storage facilities for apartments and communal living units. The cycle facilities for those dwellings hereby permitted shall then be completed in all respects in accordance with those details before that dwelling is occupied and shall be maintained as such thereafter.

Reason: To ensure that adequate cycle storage is provided in line with the Government's aims for sustainable development.

14 The reserved matters submissions shall include details of vehicular manoeuvring facilities for each dwelling and vehicular parking, including electric car charging points. The parking and manoeuvring facilities for each dwelling hereby permitted shall then be completed in all respects before that dwelling is occupied in accordance with those details before the development is brought into use and shall be maintained as such thereafter.

Reason: To ensure that adequate car parking provision is provide to meet future demand in the interests of highway safety and in line with the Government's aims for sustainable development.

15 As part of any reserved matters application details of the number and location of bin stores shall be submitted to and approved in writing by the Local Planning Authority. The bin stores shall be provided in accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the satisfactory provision of bin stores in appropriate locations on the site.

16 Prior to development of each phase as per conditions 4 and 6 a detailed masterplan shall be submitted to the Local Planning Authority and agreed in writing. The Detailed Masterplan shall include a two-dimensional layout, and dimensioned cross section drawings that show:

- the arrangement of street blocks;
- the arrangements for car parking;
- street types.

Reason: To manage the development of the site and access roads.

17 No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction

period unless otherwise agreed in writing by the Local Planning Authority. The Statement shall provide for:

(i) the parking of vehicles of site operatives and visitors, and routing of construction vehicles specify the type and number of vehicles;
(ii) loading and unloading of plant and materials;
(iii) storage of plant and materials used in constructing the development;
(iv) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
(v) wheel washing facilities;
(vi) measures to control the emission of dust and dirt during construction; and
(vii) a scheme for recycling/disposing of waste resulting from demolition and construction works.

Reason: In the interests of highway safety and neighbour amenity.

18 No site works or clearance shall commence in any phase until the protective fences have been erected in the positions indicated on the approved plans unless a variation is approved in writing by the Local Planning Authority. Until the development in that phase has been completed, these fences shall not be removed and the protected areas shall be kept clear of any building, plant, material, debris and trenching, with the existing ground levels maintained, and there shall be no entry to those areas except for approved arboricultural, landscape or ecological works unless a variation is approved in writing by the Local Planning Authority.

Reason: To safeguard the areas to be landscaped and the existing trees and planting to be retained within the site.

19 If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for a remediation strategy detailing how this contamination shall be dealt with. The remediation strategy shall be implemented as approved.

Reason: To ensure the protection of controlled waters

20 The development hereby permitted shall not commence until drainage plans for the disposal of surface water and foul sewage have been submitted to and approved by the Local Planning Authority. The scheme including agreed phasing arrangements shall be implemented in accordance with the approved details before the development is first brought into use.

Reason: To ensure that the development is provided with a satisfactory means of drainage as well as to reduce the risk of creating or exacerbating a flooding problem and to minimise the risk of pollution.

21 No works shall commence until a detailed Construction Environmental Management Plan for wildlife (details of how they will be protected and the proposed enhancements) in line with the recommendations in Chapter 8 of the Environmental Statement is submitted and approved in writing by the Local Planning Authority and implemented in full in accordance with the timetable laid out within the plan.

Reason: To ensure that wildlife and the biodiversity of the site are protected and enhanced in accordance with the Wildlife and Countryside Act 1981 as amended; NPPF; The Conservation of Species and Habitats Regulations 2010; the Natural Environment and Rural communities Act 2006; and Policies NE 3 and GE 7 of the Cheltenham Borough Council Local Plan.

22 No works shall commence on any phase until a detailed lighting plan is submitted to, and agreed in writing by, the local Planning Authority for the relevant phase.

Reason: To ensure that bat flight paths as identified within Chapter 8 of the submitted Environmental Statement are protected in accordance with the Wildlife and Countryside Act 1981 as amended; NPPF; The Conservation of Species and Habitats Regulations 2010; the Natural Environment and Rural communities Act 2006; and Policies NE 3 and GE 7 of the Cheltenham Borough Council Local Plan.

23 The development of each phase as per condition 4 shall not begin until a scheme for the provision of affordable housing for that phase has been submitted to and approved in writing by the local planning authority. The affordable housing shall be provided in accordance with the approved scheme and shall meet the definition of affordable housing in the NPPF or any future guidance that replaces it. The scheme shall include the numbers, type, tenure and location on the site of the affordable housing provision to be made.

Reason: The development proposes more than 15 dwellings and, therefore, to comply with policy HS4 (Affordable Housing), a minimum of 40% (or as may be varied by a review or replacement of the Development Plan) are required to be made affordable.

24 No development shall commence on site until a scheme has been submitted to, and agreed in writing by the Council, for the provision of fire hydrants (served by mains water supply) and no dwelling shall be occupied until the hydrant serving that property has been provided to the satisfaction of the Council.

Reason: To ensure adequate water infrastructure provision is made on site for the local fire service to tackle any property fire.
NOTE: The developer will be expected to meet the full costs of supplying and installing the fire hydrants and associated infrastructure.

25 Prior to the commencement of development of each phase as per conditions 4 and 6, a scheme for the provision of refuse and recycling storage facilities to serve the proposed dwelling(s) in that phase (including appropriate containers in accordance with adopted Supplementary Planning Document - Waste Minimisation in Development Projects) shall be submitted to and approved in writing by the Local Planning Authority. The dwelling(s) shall not be occupied until the approved scheme has been implemented.

Reason: To achieve sustainable waste management and to facilitate recycling in accordance with Gloucestershire Waste Local Plan Policy W36 relating to waste minimisation.

26 Before the development is occupied, the access roads and car parking areas shall be surfaced in a bound material (not loose stone or gravel) to the satisfaction of the Local Planning Authority and shall be maintained as such thereafter.

Reason: In the interests of highway safety.

27 All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the occupation of the buildings in each phase pursuant to Condition 3 and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority gives written consent to any variation.

Reason: To provide a satisfactory landscaped setting for the development.

28 The developer shall provide in accordance with the Environmental Statement sections 10 and 11 the Noise and Air Quality Control Method Statement to cover the plans to control noise and dust emissions. The plan should also include controls on these nuisances from vehicles operating at and accessing the site from the highway. Such a plan is to be submitted to and approved by the Local Planning Authority before work commences on site.

Reason: to protect local residents.

29 A scheme of odour control and noise abatement for any proposed kitchen extraction Equipment shall be submitted to and approved in writing by the Local Planning Authority prior to first occupation of any building in Class A and Class 3 uses. The approved odour and noise control scheme shall be implemented on site prior to the extraction system being brought into use and shall be maintained in accordance with the approved scheme.

Reason: To protect the amenity of occupiers of nearby properties.

30 No works shall commence on site until full engineering details of the primary and secondary accesses to the development, generally in accordance with the approved access plans, have been submitted to and agreed in writing by the local planning authority, the approved works shall then be completed prior to any occupations of any proposed dwelling or unit, and shall be retained as such thereafter until and unless adopted as highway maintainable at public expense

Reason: To mitigate the impact of the development in accordance with paragraph 32 of the NPPF.

31 No works shall commence on site until full engineering details of the capacity improvement works at the Moorend Park Road/A46 junction, generally in accordance with GCC drawing Option 1 Improvement A46 West, have been submitted to and agreed in writing by the local planning authority, the approved works shall then be completed prior to any occupations of any proposed dwelling or unit, and shall be retained as such thereafter until and unless adopted as highway maintainable at public expense

Reason: To mitigate the impact of the development in accordance with paragraph 32 of the NPPF.

32 Details of the layout and access, (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development begins and the development shall be carried out in accordance with the approved plans. No dwelling on the development shall be occupied until the carriageway(s) (including surface water drainage/disposal, vehicular turning head(s) and street lighting) providing access from the nearest public Highway to that dwelling have been completed to at least binder course level and the footway(s) to surface course level.

Reason: To minimise hazards and inconvenience for users of the development by ensuring that there is a safe and suitable means of access for all people.

33 No development shall be commenced until details of the proposed arrangements for future management and maintenance of the proposed streets within the development have been submitted to and approved in writing by the local planning authority. The streets shall thereafter be maintained in accordance with the approved management and maintenance details until such time as either a dedication agreement has been entered into or a private management and maintenance company has been established.

Reason: In the interest of highway safety; to ensure a satisfactory appearance to the highways infrastructure serving the approved development; and to safeguard the visual amenities of the locality and users of the highway.
NOTE: The applicant is advised that to discharge condition the local planning authority requires a copy of a completed dedication agreement between the applicant and the local highway authority or the constitution and details of a Private Management and Maintenance Company confirming funding, management and maintenance regimes.

34 No works shall commence on site until details of cycle signage, and non motorised highway improvements, to enable resident and employees of the development to safely access nearest facilities, have been submitted to and agreed in writing by the local planning authority, the approved works shall then be completed prior to any occupations of any proposed dwelling or unit, and shall be retained as such thereafter until and unless adopted as highway maintainable at public expense

Reason: To mitigate the impact of the development in accordance with paragraph 32 of the NPPF.

35 Prior to and development on site the detailed design of the proposed land raising within residential area C shall be submitted to, and agreed in writing by the Local Planning Authority.

Reason: To ensure that the new development does not increase flooding to the site itself or adjacent existing development.

36 Prior to the commencement of development, plans showing the existing and proposed ground levels and slab levels of the proposed and adjacent buildings shall be submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be implemented strictly in accordance with the agreed details.

Reason: To ensure a satisfactory relationship of the proposed building with the adjoining properties and land in accordance with Local Plan Policies CP4 and CP7 relating to safe and sustainable living, and design.

37 The development hereby approved shall not commence on site until the following condition has been complied with and satisfactorily agreed, in writing, by the Local Planning Authority.

i) Site characterisation
A site investigation and risk assessment should be carried out to assess the potential nature and extent of any contamination on the site, whether or not it originates on the site. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority. The report must include:

a) a survey of the extent, scale and nature of contamination
b) an assessment of the potential risks to:
    - human health
    - property (including buildings, crops, livestock, pets, woodland and service lines and pipes)
    - adjoining land
    - ecological systems
    - groundwaters and surface water
    - archaeological sites and ancient monuments
c) an appraisal of remedial options to mitigate against any potentially significant risks identified from the risk assessment.

This must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR11'

ii) Submission of a remediation scheme
Where remediation is required, a detailed remediation scheme to bring the site to a condition suitable for the intended use should be produced and will be subject to the approval, in writing, by the Local Planning Authority prior to implementation. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2a of the Environmental Protection Act (1990) in relation to the intended use of the land after remediation.

iii) Implementation of approved remediation scheme
Any approved remediation scheme must be carried out in accordance with its terms prior to the commencement of the development, other than that required to carry out remediation. Following completion of measures identified in any approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be produced and is subject to the approval, in writing, by the Local Planning Authority.

If unexpected contamination is found after development has begun, development must be halted on that part of the site affected by the unexpected contamination until section (iv) has been complied with in relation to that contamination.

iv) Reporting of unexpected contamination
In the event that contamination is found at any time when carrying out the approved development, that was not previously identified, it must be reported immediately in writing to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with section i) and a remediation scheme submitted in accordance with section ii). Following completion of measures identified in the

approved remediation scheme, a verification report must be produced in accordance with section iii).

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Local Plan Policy NE4 relating to development on contaminated land.

38 Prior to the commencement of development or any works on site, the applicant, or their agents or successors in title, shall secure the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that archaeological remains and features are recorded and/or published prior to their disturbance in accordance with Local Plan Policy BE20 relating to archaeological remains of local importance and national guidance set out within the National Planning Policy Framework.

39 The developer shall afford access at all reasonable times to any archaeologist nominated by the Local Planning Authority, and shall allow him/her to observe the excavations and record items of interest and finds.

Reason: To enable a record of remains of archaeological interest to be made prior to their disturbance in accordance with Local Plan Policy BE20 relating to archaeological remains of local importance.

INFORMATIVES:-

1 In accordance with the requirements of The Town and Country Planning (Development Management Procedure) (England) (Amendment No. 2) Order 2012 and the provisions of the NPPF, the Local Planning Authority adopts a positive and proactive approach to dealing with planning applications and where possible, will seek solutions to any problems that arise when dealing with a planning application with the aim of fostering the delivery of sustainable development.

At the heart of this positive and proactive approach is the authority's pre-application advice service for all types of development. Further to this however, the authority publishes guidance on the Council's website on how to submit planning applications and provides full and up-to-date information in relation to planning applications to enable the applicant, and other interested parties, to track progress.

In this instance, having had regard to all material considerations, the application constitutes sustainable development and has therefore been approved in a timely manner.

2 The proposed development will require works to be carried out on the public highway and the Applicant/Developer is required to enter into a legally binding Highway Works Agreement (including an appropriate bond) with the Local Highway Authority before commencing works on the development.

Mr Craig Hemphill
Cheltenham Borough Council
Development Control
PO Box 12
Cheltenham
Gloucestershire
GL50 1PP

Our ref: SV/2013/107362/02-L01
Your ref: 13/01605/OUT

Date: 28 July 2014

Dear Mr Hemphill

MAJOR MIXED USE DEVELOPMENT – 13/01605/OUT - LAND AT LECKHAMPTON SHURDINGTON ROAD CHELTENHAM

I write further to our letter dated 27 November 2013, our reference SV/2013/107362/01-L01. In that letter we commented on flood risk and drainage, ecological protection and enhancement and land contamination. We indicated we were satisfied the developer has adequately addressed these matters in accordance with the Government's National Planning Policy and advised we had no objections in principle subject to conditions.

I can confirm that this is still the case and our position has not changed. We are mindful however that we have not to date provided a written response to the additional information submitted in support of the above application which you consulted us on on 9 May 2014. I apologise for the delay in providing a written response and understand our comments are still required and will be taken into consideration.

Of the additional information submitted, the majority relates to traffic and transport matters which we would not comment on, and we note there are also no changes relevant to our remit within the revised masterplan and Design and Access Statement. We have reviewed the Ground Conditions Investigation submitted and would comment as follows:

The PAH* contamination has been detected within the made ground and not the natural ground. Furthermore it has only been found in areas overlying the Blue Lias and Charmouth Mudstone and not the Cheltenham Sands and Gravels (with only the latter likely to be in connection with the watercourses). BaP** has very low mobility and there is a very low risk of it leaching to groundwater. In view of this, we are satisfied that the site poses a relatively low risk to ground and surface waters (known as 'controlled waters'). This is in line with our view of the risk to controlled waters in our previous response.

(* PAH = Polycyclic aromatic hydrocarbons or polyaromatic hydrocarbons)

(**Benzo(a)pyrene - one of a group of compounds known as PAHs)

Cont/d..

Our comments relate to controlled waters only. We would advise that you consult with the Local Authority Land Contamination Officer as we consider human health will be the main driver for remediation of the site. (We understand you have already consulted Mr Paul Scott in this regard.)

Finally, we take this opportunity to reiterate comments made in our previous response relating to delivering flood risk improvements at the site for the wider area. We consider there is an opportunity to provide flood risk improvements at this location, especially considering the historic flooding downstream of the development. We previously advised that opportunities for such improvements should be incorporated into the development at the detailed design stage. We also suggested that if such opportunities cannot be delivered on site, it may be appropriate for the Council to secure financial contributions from the developer to make flood risk improvements off site. Following our conversations with you, we understand the developer intends to deliver the flood risk improvements within the site and will provide the detail of this at the Reserved Matters stage. We welcome this, but would reiterate that if at the detailed stage it transpires that there are difficulties in delivering the improvements within the site then we would at that point request a financial contribution be made to off-site improvements. This will be an important consideration at the Reserved Maters stage and as indicated previously we would expect the LLFA to have a lead role in the discussions with our support given our ‘strategic overview’ for flood risk under the Flood and Water Management Act.

I trust this letter clarifies our position on the proposed development. Please do not hesitate to contact us if there are any queries. A copy of the decision notice would be appreciated.

Yours sincerely

Ms Ruth Clare
Planning Specialist

Direct dial 01684 864383
Direct e-mail ruth.clare@environment-agency.gov.uk

Cc Joe Murphy – RPS Planning & Development
Cc Stuart Hodgkiss – THDA Ltd Consulting Engineers

End

Dear Mr. Hemphill,

The attached PDF document itemises the application's 'Detailed Flaws, giving Grounds for REFUSAL'.

I should like it displayed without delay on the application's 'Documents' webpage. I should like the title to be displayed as 'Detailed Flaws', (rather than just the uninformative 'Letter of Rep').

If you intend to write a supplementary report discounting any of my arguments, then in view of the shortness of time I wish to receive an emailed early draft of your claims, so that I am not prevented from responding due to last-minute brinkmanship.

I also attach the extremely relevant 1993 LPI Inspector's Report on Leckhampton, which needs to be added to the application's 'Documents' tab. (Its display title should be "1993 Inspector 's Recommendation on Leckhampton".)

Yours sincerely,

[redacted]

Detailed Flaws, giving Grounds for REFUSAL 13/01605/OUT v.01

1

This landscape coming down from Leckhampton Hill almost to the historic town Conservation Area is historic Cheltenham's only **'green wedge'**.
It makes a wonderful walk from Montpellier, through The Park, up alongside the Moorend Stream into Lott Meadow, past Leckhampton Moat and Church, onward across Church Mead and up onto Leckhampton Hill, which is the finest viewpoint down into Cheltenham (and is almost as high as Cleeve Hill, the Cotswolds' peak).

('Green Wedge' land is valued and defended from excessive erosion in many towns and cities:
Doncaster; Ingleby-Barwick, Stockton-on-Tees; Woolton-Calderstones, Liverpool; Taunton; Coalville, Leicestershire; the four 'Strays' in York; the river Commons in Cambridge.)

This Leckhampton landscape should remain **predominantly green**, especially because of its lucky inheritance of containing a rare ready-made "footpath network" traversing it. Such 'footpath networks' are historical and cannot be reproduced on other green fields further out.

At most, any development should be subservient to its semi-rural character and be low-density, a scale of development which is better addressed in Cheltenham's forthcoming Local Plan Revision.

That should be the starting point for the LGS designation (which CBC and JCS officers have unjustly shelved) , i.e. the entire area needs to be respected, not whittled away by pre-app negotiations into 'pockets' (e.g. just retaining a few hedgerows).
Nevertheless, it is possible to identify the 'prime' areas within the Leckhampton landscape which are the most essential elements of Local Green Space.

All these environmental refusal grounds are best set out in the Cheltenham Local Plan (1993) Inspector' Report, and they remain almost unchanged in accuracy and validity.
Yet CBC officers choose not only to ignore that verdict but to suppress it (by not even displaying it on the JCS 'Evidence Base' website).

This application and its prematurity are the opposite of NPPF 'Localism' provisions, which have been implemented locally in Leckhampton so as to be meaningless.

2

The proposed **local centre** directly onto Shurdington Road is in obtrusively the wrong place,
(see the plan on page 77 of the 'DAS (Design & Access Statement) Addendum submitted April 2014').

2.1
Drive out of town along Shurdington Road;
after leaving the Moorend Park Road traffic lights, the land **drops** to the point where the **Moorend Stream** crosses under the road (where the footpath to Leckhampton Hill exits on the left).
The road then **remains low** (and quite confined) until it crosses over the **Hatherley Brook** (just before the right-turn into Warden Hill) at which point Shurdington Road has climbed onto a **high section**, which then lasts until it reaches Kidnappers Lane, after which the road drops sharply.
This high section, between Woodlands Road and Kidnappers lane, is the key viewing stretch for the Cotswold Escarpment.
It will be blocked/destroyed as a viewpoint by the proposed commercial centre and 3-storey office blocks.

In this inadequately 'outline' application, no artist's impressions are provided for the transformation of the present greatly enjoyed 'view to the hills' over the pigs' field.
This elevated section is the best vantage point for the Escarpment on the entire A46 towards Shurdington, and is enjoyed by everyone entering and leaving Cheltenham from the south west.

The destruction of this key viewpoint to the Cotswold Escarpment is criticised by the Cotswold Conservation Board (and by Natural England).
Shurdington Road is Cheltenham's principal and closest view to the Cotswold Escarpment, looking towards the local highpoint of Leckhampton Hill with its distinctively quarried and treed elevation.
Destruction of such a key town-enhancing view is unacceptable.

2.2
The **main access avenue** into the local centre (shops), and to the office blocks and the school etc, is also to be sited at this most obtrusive point (the Cotswolds viewpoint).

Moreover Shurdington Road itself is to be widened in this sensitive section to a four-lane traffic-lights junction, a considerable environmental downgrading.

2.3
Not only would **rows of shops** be incongruous on residential Shurdington Road, a gateway to Cheltenham, the provision of shops so visibly 'out of town' will take trade from, and seriously **undermine, the exceptional and still viable 'Bath Road Shopping District'**, which is a key attractant for residing (with low car use) in South Cheltenham, e.g. in the dense 'Regency artisan' streets surrounding the local shopping centre.

We understand that the post office, a central linchpin, would depart to Shurdington Road (because post offices now like depot/drive-up facility, and it is cheaper to do all in one building, never mind the extra car-miles by customers).

Similar extra car-miles will occur if the doctor's surgery in Moorend Park Road carries out its declared intention to relocate to the applicant's proposed new surgery, further out from town districts.

Finally, there is a further shopping impact, on the nearby Warden Hill 'neighbourhood shopping centre', which serves an area of many bungalows with elderly residents, and which manages to survive (with kerbside parking) despite its proximity to the large Morrisons 'district shopping centre'. However, the Warden Hill shops will struggle to withstand competition from highly prominent retailing sited nearby on the A46.

2.4
Apart from highly visible shops and their carparks, the other main component of the commercial district on Shurdington Road, to be sited at the Cotswolds-viewing highpoint, would be **six office blocks** which are to be **three storeys** in height, (because that is claimed to be needed to make office buildings viable).

An office/commercial district is better sited in a less residentially desirable area, either in town or in the emerging office district near the excellent bus 94+ route through Arle Court.

2.5
Immediately off the lower section of Shurdington Road (i.e. lying between the Moorend Stream and Hatherley Brook) the proposed housing is to be high density.
Yet this open landscape, immediately inside the (currently overgrown) boundary hedge, also offers long "hill views", which would be erased by dense development.

In the absence of any illustrations provided by the developer, just visualise some of the higher-density, 3-storey, high-roofline blocks from the recent Grovefield Way estate placed here to block these long-established views to the Cotswold Escarpment. **These hills are Cheltenham's primary setting**.

3
The 'crowding' of the Moorend Stream (opposite Merlin Way) is inconsistent with Plan SA6 in the JCS Pre-Submission Draft, which shows one possible form of 'green wedge' extending northwards well beyond Lott Meadow, i.e. bordering the principal footpath down to Shurdington Road and into town.
This route forms the key "walk from the historic town to Leckhampton Hill".

4
The road network proposed within the development is unclear and is certainly a **tortuous** route.

No simple intelligible map is provided to highlight the entire road network proposed within the estate; the sketchy A4 'MasterPlan' is supplemented by some over-detailed diagrams by Evans Jones of kerbing at just a few junctions.

4.1
Existing residents of Farm Lane and Brizen Lane etc will have their accesses to Shurdington Road and to Church Road Leckhampton seriously lengthened and downgraded, by being forced to drive through the development for all directions of travel.

After entering the development from Farm Lane, it is slightly less tortuous for drivers to avoid the office blocks and instead turn right and drive to the west of the primary school.
However, it will be especially difficult to weave past the school's traffic and kerbside parking in that road.
Even if that school-road route proved unblocked, drivers (having reached Kidnappers Lane) would still be made to leave the lane again temporarily to weave through the southern section of the development.

This 'locking in' of existing households is gravely compounded by the proposed closure of Farm Lane at its south end. This lane closure is also planned in the Redrow 370-houses application, which TBC will probably rush forward immediately if the 650 application is permitted prematurely.

These vital issues and options need to be resolved before any permissions are conceded.

4.2
The RPS development's 'site boundary' does not include (nor cross) Kidnappers Lane, which remains completely **outside** this application. Yet the application effectively **confiscates Kidnappers Lane** for its own convenience.

It 'steals' for itself a section of Kidnappers Lane, from just south of the proposed primary school as far as the sharp right bend just east of the Hatherley Brook, to function primarily as an internal road of the estate.

Then, the next section of Kidnappers Lane (processing southward) is to be closed to through vehicles, but thereafter the estate itself disgorges into the final southern section of Kidnappers Lane (where it becomes narrow and even single-lane, heading to Church Road Leckhampton, and cannot take high volumes).

Effectively the whole of Kidnappers Lane would be appropriated by this development for its sole use, for through travel.

On the contrary, for a supposedly self-contained application (solely east and north of Kidnappers Lane) there should be NO vehicular egress from the development into this limited-capacity historic lane.

Kidnappers Lane should continue to be discouraged as a route except for existing users in the vicinity, for whom it is just viable.
In the absence of a comprehensive road infrastructure revision for the district, any additional traffic from 650 houses, plus the several other uses proposed, will swamp Kidnappers Lane rendering it unusable.

The self-interested 'wrecking' of Kidnappers Lane on this scale requires independent investigation by a planning-related "Development TRO" (Traffic Regulation Order) before any outline permission can be granted. Otherwise existing residents' human rights will be restricted and prejudiced, precluding a proper and fair consideration of their views when the intended route network is eventually set clearly before them.

4.3
It is not clear how any development in the fields (notably the 4 fields owned by GCC) lying between Kidnappers and Farm Lanes could be integrated into this RPS choice of approach-road layout.
Similarly, the (environmentally unwanted) Redrow estate proposed in TBC's fields cannot viably be accessed by this RPS layout.

Although the TBC site is sketched on the 'Illustrative MasterPlan (but using a now out-of-date layout), the RPS application **fails to propose the required comprehensive JCS-level access** for the further parts of the JCS A6 Allocation.

4.4
Apart from the four-lane approach to the proposed shopping/office centre, insufficient lanes are proposed in the lower section of Shurdington Road (i.e. the section between the Moorend Stream and the Hatherley Brook), where the main residential entrances are proposed.
Shurdington Road remains narrow and two-lane in this section, and the new entrance road is proposed to have no traffic lights, (only the separate bus entrance road is to be light-controlled).

Therefore, waiting for right-turn entry into the estate will block the A46;
and right-turn egress from the estate onto Shurdington Road will be difficult (and road-blocking behind) at all busy/queuing times.

For so many houses onto such a difficult radial road, such minimalist entry points are unworkable.

5
The application's' traffic forecasting is incomplete.

The Highways Agency's inability to enter a formal Objection to 650 houses at Leckhampton, concerning solely its impact on the Strategic Road Network or **SRN** (which includes the A417 but excludes the A46) does not take account of the full 1125+ houses which this permission would unleash.
Such myopic responses facilitate 'piecemeal planning', with disastrous later consequences (which are then not undoable).

However, the HA letter of 16-7-14 does note that the JCS currently provides "***a lack of clarity as to how traffic growth will be accommodated by the highway network***" which will have a "***consequential impact upon the SRN network***".
It is therefore premature to approve significant development of the Leckhampton allocation **until** the JCS has managed to publish the "***robust transport evidence base***" which the HA finds to be largely missing.

In diagrams, Evans Jones forecasts an unbelievably small increase in traffic at the estate's in/out junctions.

Plans 11 and 12 by Atkins (comparing Scenarios 4 with 3) show massive and implausible peak hour '**displaced flows**':

a) routed through **Warden Hill Road** (to avoid the near-standstill on Shurdington Road). But Warden Hill Road is itself blocked by huge Bournside School's traffic parking and movements. And,
b) routed through **Church Road** Leckhampton and **Hall Road**, which then connects into the single-lane constriction at the south end of **Moorend Road** (which tries to function as a de facto ring road).

These 'dispersals' are implausible and unworkable for most drivers.

6
The advice from the GCC traffic officer is that under the NPPF only 'total gridlock' can stop development, all queuing and inconvenience simply has to be put up with. This cannot be a sound unquestionable interpretation of the NPPF and supplementary ministerial advice.

Essentially, the A46 approach along Shurdington Road enters the Cheltenham Conservation Area just before the Moorend Park Road junction, and then penetrates into this historic town:
EITHER through the constricted but very active Bath Road shopping street,
OR through Park Place into peerless Montpellier, which is the most sensitive and quintessentially early district of the Cheltenham Conservation Area.

Neither Park Place not Upper Bath Road can be widened or altered or is capable of bus-lane engineering.
Massive development onto the A46 at this point is unworkable in traffic distribution terms.

When A46 traffic is seriously slowed from flowing into and through the town, then the A46 component of Cheltenham's crucial **'A-road network'** will have failed; but Cheltenham is unusual in having no other main distributor-road routes, due to having no ring roads to disperse the traffic demand.

7
Since submission in September 2013, this large application has been little modified despite the huge quantity of detailed objections.
Of the 107 documents currently on the application's 'Documents' webpage (http://publicaccess.cheltenham.gov.uk/idoxpa17/applicationDetails.do?activeTab=documents&keyVal=MT2FBRELD5000),
over one third are objections/comments.
The applicant has provided lengthy detail on some issues but is reticent on the difficult main ones, such as traffic routing and landscape views.
In summary, the supporting evidence is lightweight for such a massive irreversible impact on South Cheltenham.

The applicant's sketchy and little-changed A4 'Illustrative MasterPlan' may be tolerated for some 'outline' applications but is demonstrably insufficient to determine whether this layout and this density is viable, either environmentally or even functionally, **for this most close-in and most sensitive of all the JCS Urban Extension locations**.

8
A figure of 650 houses (in just on section of the Allocation) is too damaging in a 'green wedge' landscape; the figure derives from the 1300 imposed by the 2006 RSS EiP inspectors' report (without any detailed examination of the landscape).
However the scrapped 'South West RSS' rubber-stamped virtually every submitted site.
Thereafter, the JCS officer team, which ought to have recalled the Local Plan Inquiry history of its own locality, chose to make no more than an inadequate minor reduction to that unjust RSS figure.

from Cheltenham Local Plan Inquiry (1993) Inspector's Report

REPRESENTATIONS 24G, 35A, 69C, 96J, 100B, 105B, 110D, 129W -
Paragraph 6.43, Policy CO7

Background

6.86 The County Development Plan of 1968 left an area of 'white land' between Leckhampton and the inner boundary of the green belt. That plan said that this land, about 60 hectares of smallholdings, nurseries, market gardens and pasture, might later be allocated for development, or that it might be included in the green belt, if it appeared that it should remain open in the longer term. The deposit CELP proposed the latter course; however, the inspector recommended that the land should remain as 'white land'. *Policy CO7* perpetuates this state of affairs, whilst the reasoned justification says that: (i) the land is not required to meet housing needs in the plan period; (ii) some of the land is of good quality for horticulture; (iii) development would cause traffic problems on Bath Road and Church Road; (iii) development would overburden the drainage infrastructure; (iv) nothing in the plan should be taken to imply that the land will be released for development after 2001.

Gist of the representations

6.87 The land is not green belt, and therefore there should not be a presumption against development (24G, 96J, 100B, 110D). The policy should say that development will only be allowed when there is insufficient land elsewhere to meet strategic requirements (100B).

6.88 The inspector who considered the CELP concluded that it was not necessary to include the land in the green belt to prevent the coalescence of Cheltenham and Gloucester; or to prevent urban sprawl; or to protect the special character of Cheltenham. He described the townscape on this edge of the settlement as 'pleasant enough' but 'not particularly distinguished'. He acknowledged that the extension of the green belt would protect good agricultural land from development, but said that that was not one of the primary purposes of green belt policy. There has been no material change in circumstances since 1984 (100B).

6.89 The CELP inspector was not asked to consider the land at Swindon Farm (see representation 69B above). However, if the reasoning which he applied to Leckhampton is also applied to Swindon Farm, then it must be concluded that the latter is inappropriately included in the green belt, and should instead be covered by *Policy CO7* (69C).

6.90 The land at Leckhampton is virtually surrounded by existing residential development, some allowed recently. Before the end of the plan period, the land will be required for development, which should be planned on a comprehensive basis (110D).

6.91 The land is not of particularly good agricultural quality, being a mixture of Grades 2, 3a and 3b, and agriculture in the area is in decline. The capacity of Bath Road and Church Road could be increased by minor improvements, and traffic is likely to be drawn away from the town by new bypasses and road improvements to the south of Cheltenham. Recently completed sewerage works included capacity for significant residential development at Leckhampton. Surface water could be accommodated by existing watercourses and a balancing pond (105B, 110D).

6.92 The land at Leckhampton should be protected for its special historical, landscape and amenity value. It represents the last example of the gradual transition between the urban area and the countryside which characterised the Regency town. It should be considered anew for green belt or AONB status, for 'landscape conservation area' status, and as part of a Leckhampton Conservation Area (35A, 129W).

Gist of the council's response

6.93 The policy should be rephrased so that it does not contain a 'presumption against' development.

6.94 There is no need to allocate additional land to meet structure plan requirements. Swindon Farm is appropriately included in the green belt.

6.95 The land at Leckhampton continues to be farmed with no indication of decline. The structure plan says that development which leads to additional traffic on Bath Road will be resisted, as improvements would be damaging to the environment. The present sewerage system cannot accommodate even limited development on the Leckhampton land, and the Hatherley Brook is loaded to capacity.

6.96 It would be unreasonable to expect there to be no further need for development after 2001 in Cheltenham. The designation of 'unallocated land' is an effective tool for resisting growth in a period of restraint. It is not inevitable that any or all of the Leckhampton land will be developed, but the designation gives the council the option of a strategy which includes peripheral growth. The historical and amenity value of the land is acknowledged, and the plan should be changed accordingly. The boundaries of the AONB were reviewed by the Countryside Commission only a short time ago.

Conclusions

6.97 The land at Leckhampton was originally omitted from the green belt with the proviso that the green belt notation might be extended if it appeared at a later date that it should remain open in the long term. The CELP inspector concluded that the principles which guided the planners in 1968 applied equally in 1984, and that the land should not be green belt, but should remain open. I have had the benefit of new evidence concerning the character, appearance and historic interest of the land. I have walked over it and examined it from Leckhampton Hill, and reached my own conclusions on its merits. I have also examined Swindon Farm, which the CELP inspector was not asked to do. The GSPFA, with its strategy of restraint, in great contrast to the high level of development which occurred in the 1980s, was approved only recently (in 1992). In my opinion these are material changes, which have occurred since 1984, in the circumstances surrounding the question of longer term development in Cheltenham.

6.98 There is in my view an ambivalence in the council's approach. They argue in respect of representation 69B, above, that the strategy of restraint is likely to continue beyond 2001, and that if changes to the green belt are needed in the longer term they should be made only after a comprehensive study of the entire boundary (CBC54). At the same time, they wish to retain the option of a strategy which includes peripheral growth,

and put forward Leckhampton as their strategic reserve of land (B11 and CBC39)[5]. Logically, it should follow that only the lack of present need should, in principle, prevent the development of that land, as argued by Bovis Homes. However, the council also cite agricultural land quality, highway constraints, and drainage constraints, as reasons for opposing development. As the objectors say, once the principle of the strategic reserve is accepted, the question of land quality becomes irrelevant, and the other constraints merely await technical solutions.

6.99 I have before me very convincing, but contrasting, evidence concerning Leckhampton and Swindon Farm. The former is a complex mosaic of uses and features, full of historic interest and highly visible from the important Cotswold scarp. It is possible to walk on rural public footpaths from virtually the edge of the CCA to the top of Leckhampton Hill, passing through some very attractive landscape, such as Lott Meadow. I do not believe that the development at Leckhampton Lanes, whilst undoubtedly intrusive from some viewpoints, so compromises the generally rural character of the unallocated land that further urbanisation should automatically follow. Swindon Farm is, on the evidence and to my eye, of far less intrinsic interest, although also of good agricultural quality, but it lies within the approved green belt. However, neither area of land, according to the evidence of Mr Beese, which follows a logic similar to that of the GELP inspector, is vital to the purposes of the green belt. Moreover, as I conclude in respect of the representations concerning the NWBP, below, there is evidence of an informal but consistent impulse towards development in the north west sector.

6.100 I believe that it would be very sad indeed if development were to proceed at Leckhampton, with its variety and interest, whilst Swindon Farm remained inviolate simply because of its present green belt status. I recognise that green belt boundaries should be altered only in exceptional circumstances; but if it is wrong for Leckhampton to be in the green belt, the same logic appears to apply to Swindon Farm, and vice-versa.

6.101 In my view this dilemma can only be properly resolved by a comprehensive review of the options when and if a requirement for peripheral land release emerges. I deal with the question of the need for development land below (see for example Chapter 10 for my conclusions on housing). It is sufficient to note here that given the clear structure plan strategy of restraint, the recent approval of the first alteration, and the lack of convincing evidence to suggest that the need for development land in Cheltenham has materially changed since that approval, I see no need to release the land at Leckhampton during the plan period, or to change the policy to allow for that possibility. Indeed, I do not believe it is right to nominate the land as a strategic reserve, without properly weighing the costs and benefits of developing it against those of other sites, such as Swindon Farm.

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[5] The council cite a Ministerial letter to the Boundary Commission in support of their contention that the Leckhampton land should not be included in the green belt. However, the quotation concerned refers to 'development which is expected to take place soon', and there is no evidence before me to suggest that this quotation could justifiably be applied to the unallocated land at Leckhampton.

6.102 I believe that the reasoned justification should be changed to make it clear that the Leckhampton land is not being protected as a strategic reserve, but because of its varied topography, landscape history, dense network of footpaths, and pedestrian access from several residential districts. I also believe that, if further peripheral growth is thought to be necessary, a rigorous comparative review of the possibilities should be undertaken, using consistent criteria throughout the borough. If the plan were so changed, I do not think it would be necessary to give the land additional protection in the short term by making it green belt, a landscape conservation area, or part of a new conservation area, although all these options should in my view be rigorously explored as part of the next review process. The proper boundary of the AONB is not a matter for me to consider, but no doubt the land can be looked at again when the next review is carried out.

6.103 The land at Leckhampton appears from the latest available classification (MAFF 1) to be a mixture of Grade 2, 3a and 3b. Although not of the highest quality, the land is in my opinion sufficiently valuable for this factor to be given some weight if it ever becomes necessary to consider whether the land ought to be released.

6.104 The structure plan supports the council's contention that Bath Road does not have the traffic capacity to support further development. There is insufficient evidence for me to draw conclusions about the drainage question: there is, at the least, serious uncertainty. Whether these constraints might be overcome in the longer term is not a matter which I need to address. However, they seem to me to be of such importance, and to have implications for such a wide area, that it is reasonable to conclude that the land at Leckhampton would need to be the subject of comprehensive development proposals if it were ever to be developed, as the council suggest. In the meantime, it should in my view continue to be protected from development.

6.105 PPG2 advises that land between the urban area and the green belt which may be required to meet long term needs should be 'safeguarded'. It is difficult to see how this could be achieved in practice without applying the same sort of rigorous control over development as is usual in the green belt itself; anything less would in my opinion be seen as an invitation for speculative development proposals. How this is set out in the policy is a matter for the council, although the policy should not contain a presumption against development.

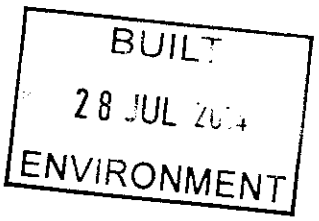
Recommendations

I recommend that:

6.106 *Policy CO7* should be rephrased so that it does not contain a 'presumption against' development. It should continue to protect only the land at Leckhampton.

6.107 The reasoned justification should be strengthened to make it clear that the Leckhampton land is not being protected as a strategic reserve, but because of its varied topography, landscape history, dense network of footpaths and pedestrian access from several residential districts.

6.108 The plan should also say that if, in the future, further peripheral growth is thought to be necessary, a rigorous comparative review of possible sites should be undertaken, using consistent criteria throughout the borough.



6 Nourse Close
Leckhamptom
Cheltenham
GL530NQ

CBC Planning Team,
Municipal Offices,
Cheltenham,
GL50 9SA.

27 July 2014

Dear Sirs,

Re: Proposed development of 650 houses off Kidnappers Lane: Ref: 13/01605/OUT.

I vigorously object to the above Outline Planning Application to build 650 new houses in Leckhampton, and change the layout of long established and historic roads just to suit the new development. The existing roads are historic and must be kept.

Over 800 people have already objected to the proposals and surely their views must be listened to. Where is democracy?

I implore the Planning Committee Members to REFUSE this application.

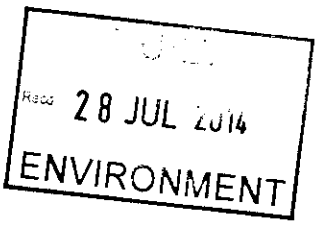
The current road system is already busy at rush hours but also during the day and to add 1000's of extra car journeys through choice is unreasonable and dangerous.

I implore the planning committee **not** to close the existing Kidnappers Lane/ Shurdington Road junction and not to allow the redirection of the existing road system which would force the existing residents through the new development.

Please note my objections and pass them on to the Planning Committee.

Yours faithfully,

[redacted]



Amberlea,
Much Marcle
Herefordshire
HR8 2NA

CBC Planning Team,
Municipal Offices,
Cheltenham,
GL50 9SA.

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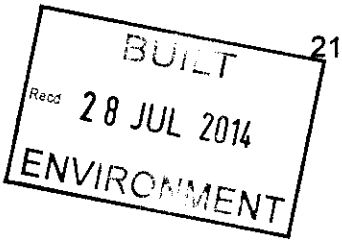

21 Windsor Street,
Hereford,
Herefordshire
HR4 0HW

CBC Planning Team,
Municipal Offices,
Cheltenham,
GL50 9SA.

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[redacted]

BUILT
Recd 28 JUL 2014
ENVIRONMENT

45 Pickering Road
Leckhamptom
Cheltenham
GL530LF

CBC Planning Team,
Municipal Offices,
Cheltenham,
GL50 9SA.

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[redacted]

BUILT
Recd 28 JUL 2014
ENVIRONMENT

77, The Wheatridge
Gloucester
GL4 7DQ

CBC Planning Team,
Municipal Offices,
Cheltenham,
GL50 9SA.

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[redacted]

Flat 5 Henbury House

Claverton Down

Bath

BA2 6DN

BUILT
Recd 28 JUL 2014
ENVIRONMENT

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Municipal Offices,
Cheltenham,
GL50 9SA.

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6 Nourse Close
Leckhamptom
Cheltenham
GL530NQ

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Recd 28 JUL 2014
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[redacted]

6 Nourse Close,
Leckhampton
Gloucestershire
GL53 0NQ

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Municipal Offices,
Cheltenham,
GL50 9SA.

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[redacted]

[redacted]

APPLICATION NO: 13/01605/OUT		**OFFICER: Mr Craig Hemphill**
DATE REGISTERED: 17th September 2013		**DATE OF EXPIRY:** 7th January 2014
WARD: Leckhampton		**PARISH:** Leckhampton With Warden Hill
APPLICANT:	Bovis Homes Limited & Miller Homes Limited	
AGENT:	Joe Murphy	
LOCATION:	Land at Leckhampton, Shurdington Road, Cheltenham	
PROPOSAL:	Residential development of up to 650 dwellings; mixed use local centre of up to 1.94ha comprising a local convenience retail unit Class A1 Use (400sqm), additional retail unit Class A1 Use for a potential pharmacy (100sqm), Class D1 Use GP surgery (1,200sqm,) and up to 4,500sqm of additional floorspace to comprise one or more of the following uses, namely Class A Uses, Class B1 offices, Class C2 care home, and Class D1 Uses including a potential dentist practice, childrens nursery and/or cottage hospital; a primary school of up to 1.72ha; strategic open space including allotments; access roads, cycleways, footpaths, open space/landscaping and associated works; details of the principal means of access; with all other matters to be reserved.	

Update to Officer Report

1. OFFICER COMMENTS

1.1. As referred to in the body of the Officer's report, JCS Policy SA1 (Strategic Allocations Policy) requires that proposals demonstrate how the provision of new Gypsy, Traveller and Travelling Showpeople sites will be incorporated into development proposals for Strategic Allocations.

1.2. Negotiations have been advancing with the applicant on this matter with the applicants agreeing that the S106 heads of terms can be extended to include a contribution towards off-site provision relating to Gypsy and Traveller sites. This means that they can show this part of Policy SA1 can be achieved. Discussion on the sum to be paid will be based on the proportion of Gypsy and Travellers needs relevant to the proportion of housing on their site.

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APPLICATION NO: 13/01605/OUT		**OFFICER**: Mr Craig Hemphill
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ADDITIONAL REPRESENTATIONS

25 Timperley Way
Up Hatherley
Cheltenham
Gloucestershire
GL51 3RH

Comments: 31st July 2014
(1) Final Summary attached.
(2) Letter x 2 attached.

10 The Lanes
Cheltenham
Gloucestershire
GL53 0PU

Comments: 29th July 2014
I write to express my total opposition to the above application.

Even putting to one side the destruction of the highly valued and important land of Area of Outstanding natural beauty as well as farming and very actively used recreational land, the submitted plans do not resolve the issue that will be caused by the inevitable increase in traffic. It is highly likely that each household will have at least one, if not two cars, which will add significantly to congestion and not just on the current main thoroughfares of Shurdington Road and Moorend Road and routes out through Hatherley. Developers have previously admitted that on the Brizen Farm application the highways network is already broken. The amount of traffic in this area is already difficult, not just along the Shurdington Road but it is impossible to see how the situation in Church Lane will be improved as local drivers will undoubtedly use that route via Farm Lane also to avoid the congestion created in the Shurdington Road. Traffic pollution levels at the Moorend/Shurdington Road traffic lights have already had been measured as over the EU permitted thresholds. How will an additional 1000+ vehicles make this better? If priority at the proposed new traffic lights is given to Shurdington Road traffic, which is already congested at peak times, drivers turning into the main flow of traffic will be waiting in long queues, exacerbating this problem. Residents of Warden Hill wishing to use the Shurdington Road will also undoubtedly be impacted.

Furthermore, the proposed additional use of " Class A Uses, Class B1 offices, Class C2 care home, and Class D1 Uses including a potential dentist practice, children's nursery and/or cottage hospital; a primary school of up to 1.72ha; strategic open space including allotments" will only add to the traffic problems - not only will there be additional residents, such development will attract people from outside of the immediate area into the proposed new amenities.

Finally, closing Kidnappers Lane and diverting traffic through the proposed housing estate is not a solution that will create any real advantage to existing residents of The Lanes, Kidnappers Lane or Farm Lane. Indeed, it will only serve to make egress and ingress in the area more problematic.

I strongly request that the very large urban expansion proposed in this planning application, with the ensuing traffic chaos that it will cause, is rejected.

St Brizen
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NL

Comments: 31st July 2014
Cheltenham is what it is today, both in the central areas and outer areas such as Leckhampton due to the far sighted approach of planners of the day. Would the present bunch have bequeathed such a splended Promenade and good, accessible out of town amenities where people could enjoy relaxtation and the wild life of areas? I doubt it. They will pass on to future generations the imperfections of their plans.

Their plans lack integrity as shown by their manipulation of population statistics in the face of the professional approach adopted by Leglag. Transparency is absent as information is withheld and the output of Leglag ignored - that's seems the best they can do.

Once the decision is made to blot the landscape by building on greenfield site there will be no going back as they set Cheltenham, not just Leckhampton, on a downward slope. Cheltenham, with urban sprawl, will not be the Cheltenham that we know today, renowned for a good place to work and live. It is like destroying a leading brand for the benefit of a dubious short gain or rather a detriment.

I suggest that the planners appeal to the facts regarding population figures and make an attempt at explaining why, if that is what they believe, Leglag has got it wrong. They 'duck' the issue rather than address it. They also ignore the consequences of the infrastructure that will cast an irreversible blot on the landscape.

Earlier generations of planners left Cheltenham in a position of eminence of which Cheltenham people have always been proud. It is not just Leckhampton people who will suffer if the 650 house development proceeds. for example, it is no minor point that the roads will not take any more traffic. The proposed solutions will change the area once and for all.

Local authorities have a serious responsibility to help maintain the standards and benefits that Leckhamton currently offers. Short term policitical issues are no guiding light when long term issues should come to the fore.

West Barn House
Leckhampton Farm Court
Leckhampton

GL51 3GS

Comments: 31st July
Letter attached.

5 Blackthorn End
Leckhampton
Cheltenham
Gloucestershire
GL53 0QB

Comments: 29th July 2014
I am concerned that e-mails I sent to Cheltenham Councillors on the planning committee could not be delivered, despite being sent to their published addresses. This means that local democracy and consultation cannot operate via e-mail.

I question whether it is legal to proceed with the meeting regarding the outline planning application for 650 houses in Leckhampton when voters cannot contact Councillors before the meeting. I was certainly not aware that contact had to be by mail with my address included.

I request that the decision is delayed until this situation is clarified.

I apologize if I have got hold of the wrong end of the stick.

5 Nourse Close
Cheltenham
Gloucestershire
GL53 0NQ

Comments: 29th July 2014
As a current resident I would not want to have to take a de-tour around a new development to join a traffic queue at the new suggested traffic lights each time I need to drive down the Shurdington Road.

The proposal of 650 houses would greatly impact our quality of life as we frequently walk through/around this area.

We have also found recently that the local senior school is also over subscribed but there has been no proposal to increase capacity or build a new senior school and this will continue to impact our life as are children get older.

5 Nourse Close
Cheltenham
Gloucestershire
GL53 0NQ

Comments: 29th July 2014
As a current resident I would not want to have to take a de-tour around a new development to join a traffic queue at the new suggested traffic lights each time I need to drive down the Shurdington

Road. The proposal of 650 houses would greatly impact our quality of life as we frequently walk through/around this area. We have also found recently that the local senior school is also over subscribed but there has been no proposal to increase capacity or build a new senior school and this will continue to impact our life as are children get older.

10 The Lanes
Cheltenham
Gloucestershire
GL53 0PU

Comments: 30th July 2014
I object in the strongest terms to this application.

Residents in this area have already raised many hundreds of objections to similar planning applications. This application brings no new advantages and includes many if not all of the disadvantages identified in similar applications.

I urge you to consult your consciences: it is mischievous, perhaps malicious, of those submitting applications to submit similar, flawed and unwanted proposals in the hope that one will get through. It would be wrong of the planning department to accept any one of these attempts, given the wide-scale and comprehensive flaws identified by many local residents and others in these applications.

Of the many flaws in this application, the significant increase in traffic congestion is a clear reason to reject the application. The changes to access will also contribute to lower average speeds and more polluting emissions. Like many others, I live here and I do not wish to die of pollution-related health problems.

In any application that you consider, I strongly urge you to reject plans to close the existing Kidnappers Lane junction. If the number of exits onto the Shurdington Road does not grow with increasing traffic volumes then we will be driving up pollution and frustration, lowering the quality of our lives.

We all know the tactics the developers are using: keep sending applications, one might stick. I strongly urge you to reject this application. The County needs an effective strategy, one that reflects the wider needs of the community and the local environment as well as the national demands on housing stock based on accurate predictions of demand. Any hastily-conceived concession to developers pursing short term gain would be a grave mistake on your part.

I believe some development in this area is necessary, but this plan goes too far. As officers of the council representing our interests, I ask that you reject this planning application in all our

10 The Spindles
Cheltenham
Gloucestershire
GL53 0QD

Comments: 29th July 2014
I write to object most strongly to the above application and I have been advised that you will LISTEN.

I have recently had a letter from Cheltenham Borough Council advising 'Your vote matters'. But do our views and concerns matter? Are you listening and taking note of those hundreds of objections to this proposed new development and why is it being considered BEFORE the decision on the JCS and consideration of the new numbers issued by the ONS?

1. More houses bring more cars - at least two per property based on the current ratio in The Lanes and Brizen Lane estate, so a further 1300 cars. More cars will make the already bad pollution in the area even worse. I understand from the local Primary School that more and more children are now using inhalers due to the poor air quality in and around the area. Do you really want to make it even worse?

2. An additional 650 homes will bring traffic chaos to the area which is ALREADY at capacity.
Trying to manoeuvre through Church Road is difficult at the best of times, and is even worse during school time.

It has become a rat run for those living in the east of the town wishing to get to the A417. Additional cars will make this worse and put children's lives at risk.

3. The proposed re-routing of the road network for existing residents taking us through part of the new development, which includes a primary school, is again dangerous for those attending the proposed new school.

With an increase in cars, the traffic is bound to build up from the proposed traffic lights, back into the new development which, again is fraught with danger.

4. What will the area be like if the JCS approves the additional 1100 houses??

If you decide to ignore all the objections, PLEASE do not close the existing Kidnappers Lane/Shurdington Road junction. Instead, you could make things better for us than they currently are. How about a left turn only taking residents down to the roundabout on the Shurdington Road or, install a new roundabout on the junction.

I appreciate this is a difficult decision for you and that the future of this green field area and beautiful part of Cheltenham is in your hands to ruin.

PLEASE, PLEASE - Listen and take note of all the objections.

"VERY SAD INDEED" (1992 Cheltenham Local Plan Inspector's verdict)

Final summary to prevent this very avoidable sacrifice of Cheltenham's Leckhampton landscape.

1

What precisely is the benefit from permitting this bad 'Outline' scheme now (i.e. prematurely to the final JCS) ?

No such benefit from haste has been established.

At most, the planning officer's report (para. 14.1.4, see also 2.2.4) does state: "This site forms part of the existing five year supply of housing". But that is inaccurate, a misrepresentation, because none of the JCS allocations is approved yet, so none can form part of the "existing" supply.

In 2.2.4 the Planning officer states "we currently have 5.1 years of housing land supply; parts of the Leckhampton allocation making up 0.2 years of this supply". But no JCS allocation can be "part of" the current supply until it is approved, so this decimal-point precision is misleading.

Most importantly, due to remaining in the joint JCS, Cheltenham shares Gloucester's roughly "11 year supply" umbrella, (which is about the only benefit we have gained from joining expansionist Gloucester).

There is no positive need established for permitting a partial application ahead of the JCS.
Indeed officers have stated (para. 14.1.6) state they would prefer one comprehensive application.

The planning officer's Report does not set out any need or benefit attributable to permitting the application **now**, prematurely and piecemeal, considering that this Outline application seeks to finalise little more than the **location of three 'main accesses'** off Shurdington Road, and also to get some maximum densities per hectare conceded.
Everything else is unfixed, uncertain, "indicative", aspirational, and therefore can and will be argued down on "financial viability" grounds at subsequent Detail application stages, and by standard Variations to any S.106 agreements (which are still not fully drafted to set before the planning councillors).

The Officer's Report para. 1.3.2 states:
"application seeks to **determine** the principal means of access", whilst
"appearance, landscaping, layout and scale are reserved".

For example, concerning the unbelievably high percentage of Affordable Housing claimed by the planning officer (40%), there is no **'Financial Viability Assessment'** (FVA) to show how large or indeed small a percentage of affordable housing will be deemed deliverable here.

Yet the planning officer baldly states (in para. 14.1.2) that: "The proposal would deliver ... 40% affordable housing". Very misleading.

2

So, if it is not to secure any positive benefit,
is premature 'Permit' being recommended just out of fear, or by scaremongering ?

Firstly, we should have no fear of RPS trying a non-determination appeal, because Leckhampton has demonstrated that it has all the intrinsic merits to survive in front of independent Inspectors (of both CBC and TBC Local Plans). Anyway, if permitted locally on Thursday, then all chance of Leckhampton's landscape surviving is extinguished.

The principal **'scare'** is that there is a further possible risk from an appeal. However, the planning officer's Report neither relies on, nor even mentions, the New Homes Bonus (NHB), and therefore that 'scare' should not be raised by officers verbally for this decision meeting.

The NHB scare is only written down as a footnote to a briefing sheet sent recently to planning councillors by the PR consultants for this application. It states:
"Note: ... local authorities will not be eligible to receive NHB payments in cases where the development in question has been permitted by an Inspector at appeal."

In practice it would clearly not be lawful to withhold NHB from a council merely because they had refused or deferred an application on *prima facie* reasonable grounds, even if an inspector were to take a different view later.
Withholding could only conceivably be carried out if the Council's decision were shown to be baseless or to be seriously at fault, i.e. with costs having been awarded against. Leckhampton has far more Appeal material for any such risk.

3
You CAN refuse on Prematurity grounds, provided that **"the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits",**
(Planning officer's Report Para. 2.4.2)

More than adequate disadvantages of permitting this Outline application have been set out (e.g. summarised below).
Nor are there any overriding public benefits from permitting the application prematurely to the JCS.

4
You CAN also refuse on Grounds of the major flaws in this application.

4.1 **Refuse as not sufficiently comprehensive or integrated.**

A premature partial application definitely would compromise the desired comprehensive and integrated solutions, both for the whole of the Leckhampton allocation, and for the whole '**A46** corridor' (i.e. including the proposed Brockworth Urban Extension).

The officer's report para. 14.2.1 states that **"Officers conclude"** that this application **"can be brought forward without compromising the wider allocation"**.
This is not true, on several counts.
The application compromises any integrated internal 'road network' for the whole A6 Allocation.
It also fails to identify integrated 'main road access' (i.e. to/from the A46) for the remaining two parts of the A6 Allocation.
It also pre-empts a strategic JCS infrastructure delivery assessment of the whole **A46 (South)**, i.e. to include the considerable traffic volumes expected into Cheltenham from Allocation A4 at Brockworth.

The issue of Landscaping also needs to be done comprehensively for the entire Leckhampton allocation, i.e. do not concede a commercial and high-density 'messing up' of the Shurdington Road viewpoints and frontage, and then let the remainder of the Allocation apply for more piecemeal development later.
Instead, retain some leverage on the overall quality of the developments, by keeping all concessions in back pocket at the outset.

4.2 **Refuse the proposed visual treatment of the Shurdington Road frontage.**

The proposed 'commercial centre' is incongruous if sited so obtrusively fronting this hitherto entirely non-commercial and finest 'main approach' directly into the historic town (Cheltenham Conservation Area).

Even worse, it occupies the sensitive 'corner field', blocking/deleting the most popular views from the elevated section of Shurdington Road towards the local highpoint of the Cotswold Escarpment (AONB).
This constitutes the widest and most numerous public participation in local landscape appreciation, both by locals and visitors.

Such blocking cannot be "minimised" or "mitigated"; these words are empty of meaning in this case.

4.3 **Refuse until a retail Sequential Analysis demonstrates no harm to adjacent facilities.**

The proposed "local centre" (2 hectares) has enough scale to contain a Tesco Metro or Sainsbury 'Local', which would, because of its over-visible radial road location, **harm** not only the more in-town 'Bath Road Shopping District' but even harm the Up Hatherley 'District Shopping Centre' (Morrisons). **Therefore CBC needs to require a retail sequential analysis before any approval.**

When listing (in 2.2.2) the 'Saved Policies' from the 2006 Cheltenham Local Plan, the planning officer omits as relevant all the Retail policies, especially the very relevant RT7.

Policy RT7 Clause (b) permits retail developments which 'would not harm an existing District or Neighbourhood centre'.

Table SA1 in the Pre-Submission JCS does not allocate any hectares at Leckhampton (A6) for Employment. Therefore, there is no need for an Outline application to be seeking (prematurely) to finalise so much **commercial** (2 hectares), and especially not placed on this elevated 'Escarpment viewing' corner-field along the Shurdington Road frontage.

4.4 **Refuse the excessive scale (and density) of 650 houses.**

650 houses is too high a proportion of the JCS Allocation's currently proposed total of 1124, (amounting to **nearly 60%** of it).
The first two piecemeal schemes (RPS and Redrow) together account for **91%** of the JCS total, which would leave very few for the considerable area of GCC-owned fields lying between Kidnappers and Farm Lanes. Any 'outline' figure for RPS needs to be significantly lower.

4.5 **Refuse the treatment (effective 'confiscation') of the important link Kidnappers Lane.**

The planning officer's report claims (14.1.6) that "The application site will deliver its own infrastructure". This is untrue; it **appropriates** Kidnappers Lane (which lies outside the RPS site boundary and ownership) to become primarily an internal road of the development.
That has severe adverse consequences for all the many existing residents off Farm Lane, and for other Leckhampton residents .

The line of Kidnappers Lane (KL) is the only defensible 'boundary' within the Allocation, to arrest development from encroaching all the way to the Moat, and KL therefore needs to form a southern limit to any housing development sited off the Shurdington Road, with no motor vehicular access from the development onto KL.

A substantial continuous 'landscape buffer' is also needed between any development and the quiet semi-rural character of Kidnappers Lane.

4.6 **Refuse until a Financial Viability Assessment for the affordable housing % is published.**

It is already obvious from the most recent JCS 'SHMA' that Affordable Housing as high as 40% will not be delivered; it is least likely to be a high percentage in expensive Leckhampton.
Not even 25% will be achieved, once the developer begins to argue it down (at the Detail stages) as being 'financially unviable' (by means of an FVA and the "arguing down" provisions of the **'Growth and Infrastructure Act 2013'**), based probably on the huge infrastructure costs of e.g. constructing the (unplanned and unwanted) commercial centre which has been slipped into this Outline application.

Viability cannot be evaded by being an outline application.
NPPG guidance states (Paragraph: 001, Reference ID: 10-001-20140306) that:
*"The National Planning Policy Framework policy on **viability** applies also to decision-taking. Decision-taking on individual schemes does not normally require an assessment of viability. However viability can be important **where planning obligations or other costs are being introduced**. In these cases decisions must be underpinned by an understanding of viability, **ensuring realistic decisions** are made to support development and promote economic growth. Where the viability of a development is in question, local planning authorities should look to be flexible in applying policy requirements wherever possible."*

3/6

5
Deferment
If councillors or officers or the applicant decide to Defer a decision, there must be NO partial or indicative 'concessions' given to this developer.

Deferment certainly would need to be for long enough to resolve the JCS allocation and infrastructure delivery issues.

The Gloucestershire JCS may be "at an advanced stage" but it is not yet 'sound',
Specifically in the case of Leckhampton, there are numerous outstanding Objections which received very little attention (alongside the huge Up Hatherley controversy) and for Leckhampton virtually no adjustments have yet been made in the JCS Draft, nor has the JCS strategic infrastructure evidence yet been produced for consultation.

In similarly obstructive style, a 63-pages document 'GCC Highways Comments' dated 17th July has just been inserted (after that date) onto this application's 'Documents' webpage, thereby giving objectors too little time to critique it.

6
Further considerations

6.1
Any perceived "dereliction" of the land (enforced by Gloucester Diocese declining to renew tenancies) is reversible.
This Inspector-commended landscape needs a locally-directed **Local Green Space assessment** before agreeing to any 'illustrative masterplan', to see whether strategic-scale (defined as greater than 450 houses) development is environmentally sustainable or not on these fields.

6.2
For such a sensitive long-running location, this is an extremely lightweight and slanted officer's report.
It doesn't even punch hard for conceding the development ahead of establishing the location's JCS inclusion and 'soundness'. Yet the Report is insidiously slanted.

In para. 2.1.3, The planning officer chooses to print out at length the 2007 development-favouring view of the Panel of the RSS, which he notes was "abolished" and is now **"not a material planning consideration"**.

Then, for lack of balance, he chooses to omit all mention of the unanimous resolution passed at Full Council on 28th February 2014, demonstrating that Leckhampton is a priority to remove from the JCS.

He also omits any reference to, or acknowledgement of, the long planning history of this greenfield site and its **most detailed commendation**, in the 1993 Local Plan Inspector's Report.

6.3
The planning officer's Report claims in Para. 4.2.14 that:
"approximately 44%" of the site will be "green space".
However, the bulk of that is Lott Meadow, of which Bovis are the owner (i.e. not just the holder of a 'development option'). Development of Lott Meadow by Bovis was tried decades ago, failed, and every verdict thereon since has ruled out any development.
Therefore, keeping Lott Meadow green is not philanthropy; moreover, the meadow is peripheral to the proposed development area.

Para. 2.3.16, concerning 'local green space', states that:
"having regard to JCS policy INF4, the proposal appears on its face to make reasonable and proportionate provision, **however this has not been tested within the context of a potential future designation of land as local green space as defined by the NPPF**."
It does need to be tested first.

6.4
The planning officer's para. 2.5.4 admits that:
"the proximity of the site to the AONB means that matters of **design, layout and landscaping** are very important factors to be considered in assessing the acceptability of the proposal".
But none of these factors would be fixed in place by granting an Outline application, which is also partial and unintegrated.

6.5
The entire Allocation's 168 **secondary** school pupils will need to displace pupils across the town, tending towards the larger North West urban extension, which may not be avoidable and where a complete new secondary school could be warranted and afforded.

6.6
Para. 13.1.5 of the planning officer's Report is self-justifying verbiage. It claims that the JCS has concluded, concerning **"green infrastructure"** and **"useful green and amenity space"**, that **"these requirements did not outweigh the value of a sustainable urban extension to this part of the town"**.
However, the JCS publishes none of its 'conclusions' or its internal reasoning ('horse-trading' by leading cuncillors is a more accurate description).
This claimed 'outweighing' is manifestly not the popular Local assessment.
In truth, the JCS has been too overloaded reversing its unsound inclusion of Up Hatherley to be able to assess Leckhampton properly and afresh.

He also claims that the 'Illustrative Masterplan' (one A4 sheet, apart from which there are very few plans in this application) "demonstrates" that the site **"could be designed to a good standard"**.
'Could' amounts to little certainty, at this Outline stage.
This is weak stuff to justify permitting 650 houses plus commercial in a most sensitive location.

6.7
In similarly sanguine style, para. 2.4.1 states:
"Based on the submitted application together with the detailed **negotiations** between the applicant, Council and relevant infrastructure stakeholders there is **no reason to doubt that a comprehensive development can be delivered."**
However none of this has been properly set out and tested yet; and there are specific reasons to doubt that it can be, as above.
Private "negotiations" with unelected officers is inadequate, in the absence of any substantive Localism being invited or allowed in Leckhampton, e.g. with the Parish Council or with high-membership Leglag.

7
Perspective

7.1

i Cheltenham is of national renown and pre-eminence, being the most complete Regency town; **and**

ii it has the largest Conservation Area in England, encompassing the whole nineteenth-century town, most of it homogeneously continuing the Regency style; **and**

iii the A46 radial approach from Painswick is the town's finest (and non-commercialised) approach, leading directly into the historic districts of Bath Road, The Park, and Montpellier; **and**

iv the Leckhampton greenfield land forms the best (indeed the only remaining) **'green wedge'** of countryside, extending down from the adjacent Cotswold Escarpment (AONB) almost to touch the Conservation Area, at The Park; **and**

v the objections by the Cotswold Conservation Board and by English Nature have not been resolved;
and therefore

vi the short-sighted and easily avoidable destruction of this Leckhampton 'green wedge', which greatly enhances the A46 approach (and the whole setting of Cheltenham), would be a national scandal,
especially as it is being perpetrated prematurely:
in advance of resolving the (deliberately stalled) LGS application,
in advance also of comprehensive transport and layout planning for the whole Allocation,
in advance also of resolving the affordable housing percentage conflict with the JCS SHMA, and
in advance also of determining the 'soundness' or otherwise of the JCS allocations and of the proposed JCS strategic infrastructure.

7.2
The current Gloucestershire JCS with its still inflated housing targets (causing a **'greenfield first' policy**), and its excessive Green Belt erosion, and its ignoring of Leckhampton's Inspector-commended landscape and very high 'doorstep amenity', is clearly **unsound**, as will be set out for the EiP.

The finest and most amenity-endowed landscape of Leckhampton must not be allowed to be unjustly scuttled before it can reach a fair and independent examination.

It is hard to credit that any Administration in Cheltenham would chuck Leckhampton's fields and views away prematurely, without a struggle. The unanimous vote on 28th February to remove Leckhampton and Up Hatherley would then be proved a sham.

25 Timperley Way
1/2

Leckhampton 650-houses Outline application (13/01605/OUT), for 31st July 214

Dear Planning Councillor,

If you have read the applicant's 'Affordable Housing Delivery Plan' (submitted in September 2013), you might feel reassured that the Leckhampton 650 site is going to deliver 40% Affordable Housing, and that this provides a good reason for approving the application.

Whilst 40% (for developments of 15 or more houses) is stated in the CBC planning documents which have been used as relevant evidence by the applicant, these documents are now 8 or 10 years old. They include the CBC Local Plan of 2006, the even more outdated 'Affordable Housing Supplementary Housing Guidance' (SPG) of July 2004, and CBC's 'Housing Needs Assessment' of November 2009. The final evidence which the applicant cites is the JCS Evidence Base.

However, it is made quite clear in the applicant's 'Affordable Housing Delivery Plan' that they expect the affordable housing quota to reflect the findings of the 'Strategic Housing Market Assessment' (SHMA) produced for the JCS, and that they reserve their rights (to revise the 40% figure) based on this JCS evidence.
In addition, account needs to be taken of the **"economic viability"** of new housing developments and this is now included in the NPPF. And 'economic viability' certainly will need to be taken into account, given the huge level of infrastructure required to build all that is proposed in this Leckhampton planning application.

The JCS SHMA (March 2014) states that the Affordable Housing quota required in Cheltenham is actually 25% (with two other scenarios shown, ranging from 23% to 26%). This same JCS document states that the Affordable Housing quota required for Tewkesbury Borough is also 25%, and for Gloucester City it is 35%. (This percentage of Affordable Housing in the SHMA includes social rented houses, affordable rent houses and shared ownership houses.)

The JCS Pre-Submission Plan (currently being consulted upon), specifically JCS Policy HS4, is inconsistent with the above JCS SHMA Evidence, by stating that all development sites coming forward under the JCS are required to deliver 40% Affordable Housing.

This inconsistency needs addressing via the current JCS Pre-Submission Public Consultation, and subsequently be properly resolved at the Examination in Public, **before** any strategic site is allowed to be granted planning permission under the misleading impression that the percentage of affordable housing will be 40%.

The developers of the Leckhampton 650 site will undoubtedly be using this same JCS evidence to argue and negotiate a case for significantly less than 40% affordable housing on the Leckhampton site, either 23% to 26% to match the JCS SHMA Evidence, or possibly even lower, based upon "economic viability" arguments, of which nothing is yet known for Leckhampton.

The planning officer's report reveals that the S.106 has not yet been agreed.
Even if it were, S.106 Agreements can be varied, and often are, so even if a figure of 40% is used for the purpose of getting this application approved, ahead of the JCS EiP, it will inevitably be reduced thereafter, based on the JCS evidence and a detailed 'Economic Viability Assessment'.

Furthermore, S.106 Agreements may not be sufficiently detailed and do not specify exactly how the affordable housing would be provided, leaving it open to renegotiation by the developer further down the line.
The developer's 'Affordable Housing Delivery Plan' states that it is to be decided at the commencement of each new phase of development, giving renewed chances of a much lower affordable quota (or even of none at all) as the development progresses.

It should be noted that there has been a recent case concerning a 200-house development site in York which was ruled upon in the High Court in February this year, where the developer successfully put forward a case for not providing any affordable housing, due to being able to prove that it was not financially viable for them to do so.
Many developers are now claiming that this case has set a precedent for them. The NPPF contains a clause setting out the need for financial viability to be considered and proved in relation to the percentage of affordable housing required on a site.

Therefore it is essential that the affordable housing viability for the Leckhampton site is tested and established by the provision of a 'Financial Viability Assessment' before planning permission is granted, and is not subject to ongoing renegotiation (by S. 106 variations) after permission has been achieved.
This Assessment is especially required for this important strategic site, where the application is premature to this controversial location being approved by the JCS EiP.

An outline permission granted for the Leckhampton site cannot guarantee the deliverability of affordable housing with any certainty at all, and certainly not for 40%. Moreover, there will be massive infrastructure costs for this site which should not be underestimated.

Without requesting a proper 'viability assessment', it is not possible to know whether the considerable office and retail centre costs (to be sited along the Shurdington Road frontage) are affordable, or will in effect prove a device to argue down the affordable housing percentage as being less viable.

Further priority costs will be the 'Community Infrastructure Levy' and substantial landscaping costs.
Finally, developers are expected to budget for a standard 17-20% profit margin (although subsequent accounts indicate that they achieve more).
At this stage, with merely a premature outline application, none of this can be assessed.

Due to the inconsistency in the percentage of affordable housing shown in the JCS Pre-Submission Plan Policy HS4 (40%) compared to the figure shown in the JCS Evidence Base (25%), the Pre-Submission Plan can be said to be **unsound**.
A 'one size fits all' approach to Affordable Housing may not be appropriate or deliverable for all strategic sites included in the JCS, and this requires JCS consultation feedback and Examination in Public first.

If this application is given planning permission upon inconsistent and misleading affordable housing figures, which might unjustly influence some councillors to support the application, then it will further undermine public confidence and trust in the planning system.

The following article in the Guardian reveals more about affordable housing losses on viability grounds:
http://www.theguardian.com/society/2013/sep/18/thousands-affordable-homes-axed-councils

I strongly urge councillors to turn this application down on the grounds of it being premature to the JCS EiP, due to the Affordable Housing quota of 40% (implausibly approaching half of this sensitive site's total!) being inconsistent with the JCS SHMA, and being extremely uncertain and unverifiable at present.

25% Affordable will certainly be an upper limit; and in Leckhampton, due to expensive land and high infrastructure costs, it will be easy to argue it down much lower at the Detailed stages.

Therefore conceding Outline permission for 650 now, before we know if Leckhampton can be scaled back (to be more sustainable) in the final JCS, would still secure no certainty on Affordable Housing.

Yours sincerely,
[redacted]

25 Timperley Way

2/2

Dear Planning Councillor,

13/01605/OUT

I understand that **no Financial Viability Assessment has been provided** for this important Leckhampton application despite many months, almost a year, of opportunity for the officers to have requested one. It is essential that one is provided to assist the decision makers and provide some confidence, both to them and to the public, that this massive development plan and all its infrastructure requirements is actually deliverable for such an important strategic urban extension, especially where a decision is being sought ahead of the JCS.

The government's own Planning Guidance website states the following concerning **Viability**:

"The National Planning Policy Framework policy on viability applies also to decision-taking. Decision-taking on individual schemes does not normally require an assessment of viability. However viability can be important where planning obligations or other costs are being introduced. In these cases decisions must be underpinned by an understanding of viability, ensuring realistic decisions are made to support development and promote economic growth."
(My underlining.)

In addition where very controversial strategic developments are concerned the Viability Assessment should be made available to the public when requested. I include an extract from **Southampton Council's Financial Viability Statement** (a concise 2 page guide available for all) as follows:

"Generally, if a viability assessment is submitted in relation to a valid planning application then the Local Planning Authority will treat the submission as a public document. Only in very exceptional circumstances would a Viability Assessment be considered confidential on a valid planning application and the developer would need to explain this at the time of submission and justify why it should be considered confidential".

I cannot see that "very exceptional circumstances" could apply here. There has been a huge public interest in this application, with many serious objections and concerns raised, including by statutory consultees, and Cheltenham's own MP.

Last year Southwark Council was forced to release the Viability Assessment for the Heygate development, after an FOI request. Southwark Council refused to make this available but the Information Commissioner forced them to release it.

The Government's Planning Guidance also states the following:

"Transparency of evidence is encouraged wherever possible. Where communities are preparing a neighbourhood plan (or Neighbourhood Development Order), local planning authorities are encouraged to share evidence to ensure that local viability assumptions are clearly understood."

It is clear from the above statement that a Viability Assessment of this application is also relevant and necessary to the consideration of the Local Green Space application by Leckhampton and Warden Hill Parish Council (submitted a year ago) i.e it needs to be shared with them and with the local community.

Regarding Affordable Housing, no matter what percentage is agreed at the grant of outline permission, the developers have the right to apply at any time to an inspector (via the Secretary of State) under the **Growth and Infrastructure Act 2013**, to have the percentage reduced, or removed completely, on financial viability grounds. That is why it is important to know at the decision making time, whether **everything** that is included in this application is actually viable, even the school, the shopping centre, office blocks, care home etc. If any of these are not viable then the affordable housing quota could be removed entirely.

Because no Financial Viability Assessment has been provided to enable you to properly evaluate the viability of this important urban extension application, it is not sufficient for the detailed S.106 agreements and the CIL amounts to be delegated to officers. Your decision requires to be underpinned by some knowledge and understanding of the viability issues. And the public also need to know that you have been provided with sufficient information and understanding of viability when you make that decision.

Yours sincerely,

[redacted]

[redacted]
West Barn House, Leckhampton Farm Court, Leckhampton
Gloucestershire GL51 3GS
Tel: [redacted]

BUILT
Recd 31 JUL 2014
ENVIRONMENT

CBC Planning Committee Team
Municipal Offices
Cheltenham
GL50 9SA

July 29th 2014

Leckhampton Planning Application Thursday, 31st July. (Application 13-01605-OUT)
Proposed 650 development off Kidnappers Lane

Dear Planning Committee Councillors,

We are asking you to strongly object to the proposed application for 650 houses off Kidnappers Lane before the JCS process has been resolved and before the public consultation of the JCS has been concluded.

Also we understand that the unelected planning officers have not addressed the elected planning committee to assess the Council approved policy for a Local Green Space (LGS) status for the Leckhampton fields (compliant with the NPPF). Approving this proposed development before we know the detail and whereabouts of this LGS is fundamentally undemocratic and should be opposed.

The above objections along with the many hundreds of residents objections over many years should help you to oppose this development. We list a few below:

1 Traffic congestion would be compounded on the A46 Shurdington Rd, Bath Rd and gridlock in Church Rd with increased air pollution. "Join the queue" is not the answer.

2 This proposed estate will effect our landscape; views from the escarpment and impact on the AONB.

3 Concern over flooding resulting from Leckhampton's high water table with the run-off from the escarpement. Will balancing ponds be adequate?

4 Secondary school places.

5 Health services - can they cope?. Where are the doctors?

On a more personal note existing residents like ourselves in Leckhampton Farm Court, those in Brizen, The Lanes and Kidnappers Lane will have to drive through this proposed estate to access the A46. We suggest leaving the Kidnappers Lane access open for exclusive use for existing residents if this proposed development should ever be built.

Please oppose this planning application. Thank you.

[redacted]

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Planning Application Ref: P13_01605

Outline Planning Application for up to 650 dwellings, other uses including A1 retail, surgery, pharmacy, primary school of up to 1.72ha land area, principal access and open space.

Suggested Grounds for Refusal

Submission to Planning Committee 31/07/2014
of Lufton & Associates Chartered Planning Consultancy on behalf of LEGLAG

Abbreviations;

NPPF	- *National Planning Policy Framework – March 2012*
PSJCS	- *Pre-Submission Gloucester, Cheltenham and Tewkesbury Joint Core Strategy - June 2014*
LP	- *Cheltenham Borough Local Plan Second Review 2006*

1. The proposed development is of such magnitude, scale and impact that it prejudices plan-making for the whole plan area and is premature to determine in terms of the progress of the PSJCS that is at a late stage but not yet been subject of public examination and as such is contrary to paragraph 17 of the NPPF and paragraph 17 and 18 of The Planning System General Principles statement (ODPM 2005).

2. The proposed development is not accompanied by a comprehensive master-plan and is inconsistent with the PSJCS provisions to ensure adequate and proportionate infrastructure supports development across the Plan A6 area contrary to policy SA1 of the PSJCS.

3. The proposed development does not relate to the comprehensive and integrated planning delivery of a draft strategic allocation consistent with Plan A6 (p.138) of the PSJCS.

4. The proposed development would result in the permanent loss of best and most versatile agricultural land and in the absence of any evidence to show that areas of poorer quality land cannot be developed in preference to that of a higher quality, the proposal is contrary to paragraph 112 of the NPPF, Strategic Objective 6 and policy SD15 of the PSJCS and policy CO10 of the LP.

5. The proposed development would by virtue of its scale and encroachment into the open countryside, have a significantly adverse impact on the character of the countryside and the adjoining AONB and would have a significantly adverse impact on the distinctive character and appearance of the landscape and relationship with the adjoining AONB in this location. As such, the proposal would be contrary to paragraph 109 and 115 of the NPPF, policies CO1 and CO2 of the LP and policies SD7 and SD8 of the PSJCS.

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6. The proposed development fails to protect and adequately mitigate important and cherished vistas to and from the adjoining AONB and would have a significantly adverse visual impact on the AONB and the wider landscape. As such, the proposal would be contrary to paragraph 109 and 115 of the NPPF, policies CO1 and CO2 of the LP and policies SD7 and SD8 of the PSJCS.

7. The application, the supporting Transport Assessment and the proposed transport and highway mitigation fails to prevent significant residual cumulative traffic impact on the local and Cheltenham wide highway network. As such, the proposal is contrary to NPPF paragraph 32, policies TP1 of the LP and policy INF1 of the PSJCS.

8. The application does not demonstrate that the adverse impacts of the proposal are significantly and demonstrably outweighed by any benefits of the development. The proposal therefore represents an unsustainable development that is contrary to the guidance of the NPPF paragraph 14.

Comments from traffic consultant, Entran Ltd

**Land at Kidnappers Lane, Leckhampton,
Cheltenham, planning application reference 13/01605/OUT**

In considering this application, it is imperative that consideration is given to both the macro as well as the micro implications of development across Cheltenham as well as local to the site.

General Cheltenham Wide Traffic Conditions

The traffic modelling that supports the application advises that by 2023 traffic conditions in across Cheltenham resultant of all development proposals will increase;

1. The number of over capacity queues at junctions by 1000% (150 to 1,500)
2. Total travel time by 40%
3. Total distance travelled by 20%.
4. Transient queues by 60%

Quite simply, the queues will get a lot longer as will journey times. At what point does this stop, it is quite clear from the modelling that a significant number of roads and junctions across Cheltenham will suffer from stifling and unsustainable levels of congestion.

Local Traffic Conditions related to the Application Site

The development of 650 houses off Shurdington Road will, as stated in the Highway Officers response;

1. Increase traffic delays at all local junctions
2. Result is a significant traffic redistribution pattern or in other words, increase in rat-running

The Highway Officers report states that none of the above can be categorised as being 'serve' and therefore do not fail the tests set out in the NPPF. However, this is on the premise that the Travel Plan measures proposed by the developer are 100% successful, not 50%, 100%. This is an admiral goal but one that is unlikely to be achieved. It is not clear whether the modelling and therefore junction analysis was based on TRICS data or manipulated TRICS data to reflect a modal shift. In this regards, a development scenario based on the Travel Plan measures and therefore modal shift targets only partly being reached should have been undertaken in order that such a situation could be considered. Without this analysis, only half the picture is being presented.

The ES rates the impact of the development under all tests as being "minor impact or significance" yet the impact on Kidnappers Lane ranges from 17-29%. This is significant. In this regard therefore, the accuracy of the analysis is questioned.

Further concerns are raised at section 3.8.9 of the TA addendum that states;

"The only roads on the approach road network near the development site which are forecast to have flows which could give rise to fear and intimidation are Shurdington Road and Up Hatherley Way. On both of these roads the average hourly flows over an 18 hour day are within the moderate degree range with baseline flows and flows with development. The total

18 hour HGV traffic on both roads is forecast to be below 300 vehicles. This falls below the threshold for links that may give rise to fear and intimidation. On no other road near the development does the average hourly flow over an 18 hour day reach the threshold for moderate degree of impact."

Shurdington Road carries more than 300 vehicles per day; the accuracy of the analysis is questioned.

The EA Addendum at 3.10.35 deals with Leckhampton Road/Church Road/Charlton Lane Double Mini Roundabout and considers the development impact to be a minor impact of moderate significance. It is considered that resultant of this, the development propsoals fail the tests set out in NPPF and CBLP Policy TP1.

Despite the above, the ES suggests that there will be no impact on highway safety, the accuracy of this statement is strongly questioned. The Non-Motorised User Audit presented as part of the TA addendum is welcomed. However, two matters arise from this audit. Firstly, there has been no quantification of footway capacities and whether the additional pedestrian traffic will result in footways operating beyond their means, therefore requiring pedestrians to use the road.

This analysis should be provided particularly at signalised crossing points on school routes, as visual evidence suggests that these crossing points and associated central islands cannot cope with demand at present, with pedestrians either waiting on the road or crossing between moving vehicles. Secondly, this assessment illustrates that despite a number of measures being introduced a significant number of pedestrian and cycle deficiencies will remain. As a result, it is considered that these deficiencies mean that the development proposals fail the tests set out in NPPF and CBLP Policy TP1

This situation must be given serious consideration and weight, especially given that the site relies heavily on achieving an increase of pedestrian and cycle traffic to reduce its vehicular impact on the local highway network. Obviously, if the infrastructure is not in place then the modal shift will not be achieved and in particular school related pedestrian and cycle traffic will be further endangered by the increase in vehicular traffic.

Unless the acknowledged infrastructure is in place, the safety of pedestrians and cyclists remains a major concern and therefore the application is considered to be contrary to NPPF para 32 and CBLP Policy TP1.

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