13/01605/OUT

Land at Leckhampton

Representations

Batch 4
I strongly object to the development proposed in the 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

Address

17 Allensfield Rd
LECKHAMPTON, GL53 0LX

Ref. 13/01605/OUT
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.
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 TCS card e.g. transport, environment, planning plus lack of described figures no action should be taken.

Name .......................................................... Address ...........................

Ref. 13/01605/OUT
Comments & Observations on 650 House Application on Leckhampton Green Fields

I would like to note my objection to the application of 650 houses on Kidnappers Lane and the Smallholding. This development presents huge problems for the infrastructure of Leckhampton, especially for the road system. The developers have in place a "satisfactory" solution, but underplaying the amount of extra vehicles and traffic, with the new system cannot fix the serious problem. This access into Cheltenham will become impassable, and residents of Church Road and Marden Farm road will have their quality of life severely compromised.

Name [redacted]
Address 57 Road, Cheltenham, 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

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 BUSY HOURS

THERE ARE NOT ENOUGH SENIOR SCHOOL PLACES IN THIS AREA

3x Name: [Redacted]
Address: 10 DRIZEN LANE, LECKHAMPTON

Ref. 13/01605/OUT
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 eco park is still to be developed. All major developments should be deferred until the first 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 garden area would be destroyed and replaced by a 'cookie-cutter' development by houses.

Name: [Redacted]
Address: [Redacted]

Ref. 13/01605/OUT
Comments & Observations on 650 House Application on Leckhampton Green Fields

I have to say that the overall impression is that we have been developers talking to business people. The scheme is flawed in many ways. The high traffic problems must be seen. The air pollution is more than acceptable limits. Where are the secondary school places? The minimum pitch field size and the space for children and social areas for people who will live there and not just work.

Name: [Redacted]
Address: [Redacted]

Ref. 13/01605/OUT
Comments & Observations on 650 House Application on Leckhampton Green Fields

It would substantially reduce local peoples enjoyment of the area. Affect schooling for all local children. Why not 'Brown Fields' sites??

Name
Address 11 Head Road GL53 1DU

Ref. 13/01605/OUT
Comments & Observations on 650 House Application on Leckhampton Green Fields

It seems sensible for the application to await the relevant infrastructure into transport environment.

Presumably if Kidnapers Lane into Childs Rd
Huntingdon Road will be closed, then another access road will be built?

Pedestrians find it very difficult to cross the
Huntingdon Road. There will be a need for
more pedestrian crossings for older persons.

The 13 will not answer out of secondary school.

Name
Address 12 Southeast Close GL5 3PD
Comments & Observations on 650 House Application on Leckhampton Green Fields

It should not go ahead. The development caused by the construction there 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 brownfield 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 reuse of existing sites.

Name: [Redacted]
Address: 37 Charle aided Lane

Ref. 13/01605/OUT
Comments & Observations on 650 House Application on Leckhampton Green Fields

I AM AGAINST THIS DEVELOPMENT AS I BELIEVE THERE IS A MAJORITY AGAINST THIS DEVELOPMENT. YOU SHOULD LISTEN TO WHAT MAJORITY THERE IS AND WHAT MAJORITY YOU HAVE FOR THE PROTECTION OF OUR GREEN SPACES.

LISTEN TO YOUR CONSCIENCE, THIS DEVELOPMENT WILL MAKE LECKHAMPTON A WORSE PLACE TO LIVE FOR US ALL FOR MANY REASONS. IS THAT THE LEGACY YOU WANT TO LEAVE? DO THE RIGHT THING AND THROW IT OUT!

Name: [Redacted]
Address: 57 Charles Lane

Ref. 13/01605/OUT
Comments & Observations on 650 House Application on Leckhampton Green Fields

So many houses in this area not needed as jobs fail... Plenty in Bishop's 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]
Address: Fairfield Rd, Leckhampton, GL5 3PE

Ref. 13/01605/OUT
Comments & Observations on 650 House Application on Leckhampton Green Fields

Shurdington Road already congested

No Senior School in local area.

Name

Address

Ref. 13/01605/OUT

Cheltenham
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 Bourne-side, 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 need 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

Chairman Merestones Residents Association
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. 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
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

[censored]

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.
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 the Bathspa 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. with little to travel for the fields. There is also a concern that the developer will reduce the amount of affordable housing if the economic climate is suitable.

Name

Address

Ref. 13/01605/OUT

CANTERBURY BARN
WALDEN ABBEY
CHINTENHAM GL51 3HF
Comments & Observations on 650 House Application on Leckhampton Green Fields

No More Houses

Let's keep the Green Fields Green!

[Signature]

Name

Address

File & Close

Ref. 13/01605/OUT
The A46 is already hugely over-congested. Further traffic would make it quite unbearable and a major hazard for children waiting for buses in the mornings.

The application should NOT be passed without further growth plans in secondary school places.

Please record the OBJECTIONS of Richard & Sam Reader

Name: [REDACTED]
Address: 10 PAINSHICK RD, CHELTENHAM
P.S. We desperately need open spaces, easily accessed, for our sanity and well being.

PUBLIC CONSULTATION ON OUTLINE PLANNING APPLICATION - KIDNAPPERS LANE 13/01605/OUT - Official End Date 18th OCTOBER  (BUT probably 21st January 2014)

Comments & Observations on 650 House Application on Leckhampton Green Fields

I object very strongly to the above planning application. It is believe the traffic would be very unsuitable at peak times. It is already grid-locked and dangerous to shoppers in both CD & locally generally. There are not enough senior school places for children.

The land in question is important for food production locally - recreation i.e. walking and cycling etc. etc. etc. and is already a very peaceful green corridor.

Ref. 13/01605/OUT
Dear Planning Officers,

Ref. 13/01605/OUT - Heckington Greenfield

I wish to object in the strongest way to the above proposed development for the following reasons:

The traffic down Heckington Road and on The Shurdington Road is already very heavy and at peak times totally gridlocked. It is very intimidating, especially in Both Roads where I do my shopping and extremely hazardous for the young and
elderly. Impatience and aggressive motorists coming in and out of Cheltenham. This development would make the traffic situation unsustainable.

Air pollution levels are already very high on the A40 and around Cheltenham 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 e.g. tits, owls, dormice and many other creatures.

I implore you not to allow this massive development to go ahead.

Thank you.

Yours sincerely,

[Signature]
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 A446. Clearly an extra 1000 vehicles is not going to help.

The above reasons are why I oppose the planning application.

Yours faithfully, David Cotton
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,
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,
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
Mr Craig Hemphill  
Cheltenham Borough Council  
Municipal Offices  
Promenade  
Cheltenham  
GL50 9SA  

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 recognises 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,

Associate Director
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.

Name
Address 25 Tamarisk Close, Up Hatherley, Cheltenham GL51 3WL
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 Cheltenham Rd, during the rush hour.

Name

Address Sandig Lane Rd Charlton Kings
Comments & Observations on 650 House Application on Leckhampton Green Fields

Before planning for the easy green field development every effort should be made to use each green field site. As already commented before the danger of flooding is a reality. The increase in traffic on Shurdington Road/Brock Road is causing laid 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.

Name
Address  HIGHWOOD AVE GL58 0JT

Ref. 13/01605/OUT

Signed 30th OCT 2013
I endorse the 3 objections listed.

I also note the overall need for the application to demonstrate that the 6 cars should be justified and all relevant impacts should be verifiable.

Ref: 13/01605/OUT

Date: 30 Oct 2013

CL 53 OK
Comments & Observations on 650 House Application on Leckhampton Green Fields

The planning application should be rejected. The road network is already severely under pressure and would be wholly inadequate. I should the proposed development proceed. The levels of pollution would be quite unacceptable, likewise the noise. Structures would be inadequate for Persons

It is probable that any politicians who support this application will be punished in future elections.

Name: [Redacted]
Address: 192 Leckhampton Rd
Cheltenham GL53 0AE

Ref. 13/01605/OUT
Building on this kind of already ben prodded to be a flawed development. Please refer to all other reports and the reasons planning was denied. However, let’s go round the loop again...

Transport, Environment & Consultation 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. Ref. 13/01605/OUT

CHELTENHAM NEEDS THIS OPEN SPACE

DAILY TELEGRAPH 24/10/13 pg. 9
Comments & Observations on 650 House Application on Leckhampton Green Fields

This threatens our green belt and extends the boundary of Cheltenham only built on true green fields can never be regained. The infrastructure around South Cheltenham - Leckhampton & Hastington 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 M5, so all these cars will have to travel via Birdlip for London/Brandon - this is already an accident hot spot. The road network cannot cope already and without demolishing houses in Church End cannot be alleviated. Please do not allow these 166 Leckhampton Road Cheltenham G153 0AA

Ref: 13/01605/OUT

Name: [Redacted]
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

CART BEFORE THE HOUSE! Fillaise JCS FIRST

The A46 into Cirencester is already a disincentive to travel into Cirencester - 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

Name [Redacted]
Address 45, Fairmile Rd
CIRENCESTER

Ref: 13/01605/OUT

Read 30 OCT 2013
ENVIROMENT
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) 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) Chelwoodgate Road cannot cope with any more traffic.

Name: [Redacted]
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.

(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.

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We are

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Other comments: f.) Have all Brownfield Sites been fully investigated? 

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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) 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 our area.

(e) Our family greatly value the Leckhampton fields for recreation. I strongly support the case made in the LVWH 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 homes going to the detriment of the packing limit are harder to use. Church Rd due to weight restriction will not be planned changes in Leckhampton Lane mean they will return to using Church Rd?
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:

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?
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:

Further reference to item (c) above:

The village already suffers from 'rat run' traffic using residential roads - these developments would make this situation unbearable.

[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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Other comments:

Fisher to item (e) above:

The village already suffers from 'rat run' traffic using residential roads - the proposed development would render this situation unbearable.
Comments & Observations on 650 House Application on Leckhampton Green Fields

The area is already very congested with traffic due to the M5 Junction 11A. The Church Lane & Bath Road are almost gridlocked at busy time. We are losing all our green spaces - Up Hamlet is over-developed now - we have no more Dedham School. This whole area is being spoilt.

Name
Address Mapledew, Sandgrieve Rd - Cheltenham
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 arising 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 undesirable development and an unのだility bad idea.
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 presence of traffic which will place upon homes and the local environment. It is inconceivable to think that Chevening Road, which is already a very busy road, and Chevening Lane, could support the extra volume of traffic that would be generated by a development of this size.

The proposal also lacks logic and a balanced approach understanding of the dynamics of the area.

Name [Redacted]
Address 2nd floor, 102 Cheltenham
22 Campion Park
Up Hatherley
Cheltenham
GL51 3WA
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

To: Public Consultation, Joint Core Strategy Team, Municipal Offices, Promenade, Cheltenham. Glos. GL50 9SA>
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.

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 Beizen Lane, Leckhampton

Ref. 13/01605/OUT
28th October 2013

CBC Planning,
Municipal Offices,
Cheltenham,
GL50 9SA

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.
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 into 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:

<table>
<thead>
<tr>
<th>Year</th>
<th>Number of accidents</th>
<th>Casualties</th>
</tr>
</thead>
<tbody>
<tr>
<td>2002</td>
<td>21</td>
<td>24 slight</td>
</tr>
<tr>
<td>2003</td>
<td>17</td>
<td>23 slight</td>
</tr>
<tr>
<td>2004</td>
<td>15</td>
<td>19 slight, 1 serious</td>
</tr>
<tr>
<td>2005</td>
<td>10</td>
<td>12 slight, 1 serious</td>
</tr>
<tr>
<td>2006</td>
<td>13</td>
<td>14 slight</td>
</tr>
<tr>
<td>2007</td>
<td>12</td>
<td>18 slight</td>
</tr>
<tr>
<td>2008</td>
<td>9</td>
<td>9 slight, 1 fatal</td>
</tr>
<tr>
<td>2009</td>
<td>8</td>
<td>6 slight, 2 serious</td>
</tr>
<tr>
<td>2010</td>
<td>9</td>
<td>7 slight, 1 fatal</td>
</tr>
<tr>
<td>2011</td>
<td>9</td>
<td>6 slight, 3 serious</td>
</tr>
</tbody>
</table>

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.

Blackspsots 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-roundabout), 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.

<table>
<thead>
<tr>
<th>Date</th>
<th>Location and Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>08/01/1991</td>
<td>Pedestrian in Bath Road</td>
</tr>
<tr>
<td>15/03/1997</td>
<td>Driver and passenger, junction of Farm Lane and Leckhampton Lane</td>
</tr>
<tr>
<td>14/11/1997</td>
<td>Driver on A46 near Hatherley Cricket Club</td>
</tr>
<tr>
<td>28/10/1999</td>
<td>Cyclist between A46 roundabout and Morrison's Supermarket</td>
</tr>
<tr>
<td>23/10/2007</td>
<td>Driver Naunton Lane</td>
</tr>
<tr>
<td>04/11/2008</td>
<td>Pedestrian A46 near Hatherley Cricket Club</td>
</tr>
<tr>
<td>01/02/2010</td>
<td>Cyclist Leckhampton Road</td>
</tr>
<tr>
<td>04/12/2012</td>
<td>Cyclist/pedestrian A46 Shurdington</td>
</tr>
</tbody>
</table>

**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