

Statement by Martin Horwood MP

CBC Planning committee 31 July 2014

Thank you, chair.

The best argument in favour of this application is that 40% of the housing might be affordable. But beware. Birmingham council affordable housing target 35% - recently found itself defending the last 3.4% - just 12 dwellings – in one major development. The new viability loophole offers developers copious wriggle I'm afraid, after outline permission is granted.

There are many more good reasons to refuse this application.

Three of the strongest planning grounds are first of all the loss of agricultural land as pointed out by Hugh Lufton in his short but very expert paper.

Then there's the transport impact on congested and narrow local roads serving Hatherley, and I declare an interest since my son Sami is one of the many Leckhampton schoolchildren who cross them every day. Add to that the bizarre plan to block off Kidnapper's Lane and Farm Lane for new and existing residents and encourage rat-running through the brand new estate and you have a recipe for traffic chaos.

Then there's the loss of one of the finest views of the Cotswold escarpment from within urban Cheltenham. Planning inspectors Mary Travers in 2003 and David Asher in 2004 both rejected development in Leckhampton, Asher saying that development here 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".

This Cheltenham local plan explicitly supports the Inspectors' conclusions and protects Leckhampton for its "recreational, landscape, wildlife and archaeological interest". Two specific policies apply:

Policy CO1 rules out development where it would harm "the character, distinctiveness, quality and amenity value of the landscape". CP3 contains an impressive list of sustainability criteria which anticipated those in the NPPF and include biodiversity, landscape character and the views into and out of the AONB.

And in case you're doubting whether this is still valid, Mike Redman confirmed to me recently that it is. He cited this back garden development in Charlton Kings turned down on appeal last September by a planning inspector quoting the local plan. Undermine it at your peril.

When parliament approved the National Planning Policy Framework in March 2012, we were quite clear we intended to empower local people. The very first core planning principle in the NPPF, paragraph 17, is that planning should be "genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans". Paragraph 155 gives particular weight to neighbourhood plans.

There isn't yet a Neighbourhood Plan for Leckhampton but there is a concept plan drafted by the body designated in the NPPF, the parish council, which covers the history of 'open' or common

meadows and fields in the area, the rich local ecology, agricultural value and more. It seeks protection for the site of this application.

There's obviously another emerging policy – the JCS – which contradicts this but is still a year from completion and out to further consultation right now. NPPF paragraph 216 says councillors *may* take account of emerging policy, giving weight to its degree of preparation but also to the extent to which there are significant unresolved objections.

Boy, are there significant unresolved objections to this part of the JCS. Cheltenham borough council; itself has twice qualified its support for the JCS even while voting for it to proceed to the next stage by questioning the inclusion of Leckhampton – most recently in April. Steve Jordan has argued in the steering group for Leckhampton to be removed from the plan which could still happen in whole or in part with even a slight adjustment in the total JCS numbers.

Passing this application against the wishes of local people and the current democratically determined local plan would go against everything parliament intended when we approved the National Planning Policy Framework.

But on 8 April full council also voted to evaluate possible Local Green Space status specifically for Leckhampton and NW Cheltenham which the council recognised as “green areas of particular local significance”.

I'm rather proud of Local Green Space status.

LGS went from my draft into this LibDem policy paper, then into our manifesto, the coalition agreement and finally the NPPF. It sought to close the loophole whereby you could protect green spaces because they had great crested newts but not because they were important to local people. It called for a new designation “comparable to Site of Special Scientific Interest” or SSSI. It wasn't designed for extensive tracts of land like Green Belt but for smaller areas like Starvehall Farm or Leckhampton. At 56 hectares, incidentally, the whole of the Leckhampton green land is almost exactly the same size as the nearest SSSI at Crickley Hill. We're too late for most of Starvehall Farm because LGS status cannot be given once planning permission is granted but we're not too late for Leckhampton or Swindon Village, unless we start undermining that process before it's even begun.

And let's be clear: LGS status is not for the leftovers after developers have had their pick. It is a protection against development and I have it confirmed in writing by the planning minister that LGS status allows planners to reduce the housing number required in plans like the JCS without undermining them if they make a very good case.

I would be quite upset if the Local Green Space policy I drafted and championed and which this council recognised when it voted for Steve Jordan's motion, and which is supported in the kind of emerging Neighbourhood Plan both coalition parties wanted, was pre-empted in Cheltenham of all places.

Please refuse this application.

Thank Chair

Leckhampton Land Development

I am addressing you this evening as the Ward Councillor for Warden Hill and I am objecting to this application on behalf of the residents in my ward who have expressed very strong views regarding the effect this development will have on their properties and their lives.

As a Councillor in 2007 I was involved with those who were affected by the extreme flooding in Warden Hill. The amount of water that flowed through the estate and entered people's homes was catastrophic. Approximately 80 properties were affected by flood water reaching 4ft inside their homes

Since that time a flood alleviation scheme has been installed that would safeguard the area

From a document I hold from CBC Built Environment report dated 27th August 2010 it stated that.

When deciding what type of prevention should be installed two options were put forward Storage and Structural Intervention. The Storage option was not preferred as the flow pathway of the land upstream of the A46 was insufficient to permit sufficient confidence in the scheme.

I therefore question how effective the proposed balancing ponds within this application will be?

Will the balancing ponds hold sufficient water to protect Warden Hill from flooding?

Will they just take on the amount of water from the loss of soak away produced by the new development? i.e. Homes, a school, hospital, business buildings etc.

I doubt they would be able to protect our area should we experience the amount of heavy rainfall flowing down from the Hill onto the Warden Hill estate. And we have already this year experienced extreme torrential rainfall that is possibly due to the climate change.

Please make sure you fully realise the impact of flooding issues in my Ward when contemplating a decision.

Traffic

The equally troubling issue of the traffic flow on the A46 running alongside the Boundary of the Warden Hill estate is causing a lot of concern, This highway is gridlocked morning and evening every day. With the possibility of several hundreds more cars from the development flowing onto the A46 not to mention the business traffic into and out of this new development this small narrow road will have over- reached its capacity and the tailbacks will considerably increase, so- to the pollution that will affect those living along this road. Measurements taken by this council show that the pollution levels exceed the EU permitted limit near the A46 junction with Moorend Park road now, and likely to exceed its limit throughout the year.

The existing residents of Leckhampton are going to be forced to use the new roads to gain access onto the A46 pushing higher numbers onto this very busy road and I believe that by blocking off the Kidnappers lane entrance will be a big mistake.

The Chairman of Leckhampton with Warden Hill Parish Council has conducted a detailed traffic analysis of the A46 and has given a written report on the dangers raised. I do hope you have had time to study this excellent document.

I believe that the whole traffic plan for the development is so short-sighted that it alone should be enough for you to decide on a refusal on this application.

I do urge you to deliberate very carefully on the issues I have raised as the result could have serious consequences for the people of Warden Hill.

Cllr Nelson
Leckhampton Ward

650 PLANNING APPLICATION

THANK YOU MR CHAIRMAN. THIS EVENING YOU WILL HEAR MANY QUESTIONS TESTING THE VALIDITY AND CREDIBILITY OF THIS OUTLINE PLANNING APPLICATION WHICH GIVES THE APPEARANCE OF SUBSTANCE BUT IS ACTUALLY AN ILLUSTRATIVE PLAN THAT LACKS A LOT OF IMPORTANT DETAIL.

SOME OF THESE IMPORTANT QUESTIONS, I AM SURE, HAVE ALREADY OCCURRED TO MEMBERS OF THIS COMMITTEE. FOR INSTANCE:

- IS THE 40% AFFORDABLE HOUSING PROMISED GUARANTEED, GIVEN THE HIGH LEVEL OF INFRASTRUCTURE COSTS AND PLANNING OBLIGATIONS THAT WILL BE IMPOSED ON THE DEVELOPER TO MITIGATE THE IMPACT OF TRAFFIC? WITHOUT A FINANCIAL VIABILITY ASSESSMENT FROM THE DEVELOPER HOW CAN WE REALLY KNOW WHETHER 40% IS DELIVERABLE OR NOT?
- ARE WE SATISFIED ABOUT THE LACK OF PLANS TO SECURE SECONDARY SCHOOL EDUCATION FOR ALL THE EXTRA CHILDREN THESE HOUSES WILL BRING? IT IS ALL VERY WELL TALKING ABOUT THE MONEY WE WILL RAISE FROM THE DEVELOPER TO BUILD EXTRA CLASSROOMS BUT THE COUNTY EDUCATION AUTHORITY HAS NOT EVEN HAD DISCUSSIONS WITH THE SCHOOLS CONCERNED TO TEST IF THAT EXTRA CAPACITY CAN ACTUALLY BE BUILT!

BUT THESE TYPE OF QUESTIONS, ALTHOUGH IMPORTANT, ARE NOT THE MAIN PROBLEMS WITH THIS APPLICATION. AS ONE OF THE TWO COUNCILLORS FOR LECKHAMPTON, I HAVE STUDIED THIS FLAWED APPLICATION IN SOME DETAIL AND THERE ARE 2 REASONS WHY I BELIEVE YOU SHOULD NOT SUPPORT THE RECOMMENDATION TO PERMIT AND RATHER YOU SHOULD MOVE TO DELAY THE APPLICATION UNTIL MORE INFORMATION IS AVAILABLE AND DUE PROCESS IS FOLLOWED.

FIRST, THE JOINT CORE STRATEGY HAS CHOSEN LECKHAMPTON AS ONE OF ITS STRATEGIC SITES AND THAT GIVES SOME LEGITIMACY TO THIS APPLICATION. YET THE JCS IS STILL ONGOING AND IS IN ITS FINAL PUBLIC CONSULTATION PHASE BEFORE GOING TO THE INSPECTOR FOR ASSESSMENT. COMMENTS WILL NOW BE ALLOWED UP TO 18 AUGUST. BUT TO CONSIDER THIS 650 HOUSE APPLICATION BEFORE ALL THOSE COMMENTS ARE IN IS AN ABUSE OF THE DEMOCRATIC PROCESS. THERE ARE STILL MANY ISSUES THAT THE PUBLIC AND OTHER STAKEHOLDERS HAVE TO SAY ABOUT THE JCS. FOR INSTANCE:

- ARE THE HOUSING TARGETS IN THE PLAN CORRECT?
- AND THE RECENT SUCCESS OF THE COUNTY LOCAL ECONOMIC PLAN, ANNOUNCED ONLY WEEKS AGO, HAS HIGHLIGHTED THAT IT HAS INCLUDED LAND NEAR JUNCTION 10 OF THE M5 FOR BUSINESS DEVELOPMENT, IN ADDITION TO ALL THE BUSINESS LAND ALREADY IDENTIFIED NORTH WEST OF CHELTENHAM WITHIN THE JCS. THIS DOUBLE COUNTING AND LACK OF COMMUNICATION BETWEEN THE 2 GROUPS DRIVING THESE PLANS GENERATES REAL POTENTIAL TO RECONSIDER EARLIER DECISIONS.

SO IT IS PREMATURE TO CONSIDER THIS APPLICATION BEFORE THE PUBLIC HAVE PROVIDED THEIR COMMENTS CHALLENGING THE SOUNDNESS OF THE JCS AND BEFORE THE COUNCIL HAS AN OPPORTUNITY TO CONSIDER THOSE COMMENTS. STEVE JORDAN HAS GONE ON RECORD A NUMBER OF TIMES SAYING THAT HE IS PREPARED TO GO BACK TO COUNCIL FOR IT TO RECONSIDER THE JCS IF THE CONCERNS COMING IN ON THE PLAN ARE SERIOUS ENOUGH. HOWEVER UNLIKELY THIS MAY BE IN THE EYES OF THE JCS AUTHORS, IT IS SIMPLY OUTRAGEOUS TO IGNORE THE POSSIBILITY OF THIS HAPPENING.

MY SECOND AND PROBABLY THE MOST IMPORTANT REASON FOR DELAYING THIS APPLICATION BEFORE YOU, IS THAT WE HAVE YET TO DEFINE THE PRECISE LOCATION AND SIZE OF THE LOCAL GREEN SPACE THAT THIS COUNCIL AGREED WE MUST DO WHEN IT ACCEPTED THE JCS LAST APRIL. IF WE VOTE THROUGH THIS APPLICATION FOR 650 HOUSES TONIGHT, WE WILL NOT MEET OUR LEGAL OBLIGATIONS TO CONSIDER LECKHAMPTON FOR LOCAL GREEN SPACE STATUS.

ACCEPTING THIS ILLUSTRATIVE MASTER PLAN AND THE DESIGN PRINCIPLES UNDERPINNING IT WILL MEAN THAT OUR HANDS ARE TIED AND THAT WE WILL NOT BE ABLE TO PROPERLY ASSESS AND PROTECT THOSE PARTS OF THE LAND THAT HAVE AMENITY, LANDSCAPE, ECOLOGICAL AND HISTORICAL VALUE. EVEN THOUGH THERE IS A LOT OF GREEN SPACE PROTECTION ALREADY OFFERED BY THE DEVELOPER, IT IS THE DEVELOPERS IDEA OF WHAT SHOULD BE PROTECTED, NOT THE LOCAL POPULATION'S OR OTHER EXPERTS, SUCH AS NATURAL ENGLAND, CPRE AND THE COTSWOLD CONSERVATION BOARD.

PLEASE CONSIDER THIS. THE PIG FIELD ON SHURDINGTON ROAD IS A HIGH POINT ON THAT ROAD THAT PROVIDES A MAGNIFICENT AND FAMOUS VIEW OF THE LECKHAMPTON ESCARPMENT AND THE AREA OF OUTSTANDING NATIONAL BEAUTY. YET THE DEVELOPER PLANS TO BUILD THE PRIMARY SCHOOL AND A 3 STOREY BUSINESS PARK THERE, WHICH WILL DESTROY THAT VIEW FOR EVER. PERHAPS THAT IS WHY THEY HAVE NOT PROVIDED THE USUAL LANDSCAPE VIEWS THAT EVEN OUR OWN PLANNING OFFICERS WOULD HAVE EXPECTED TO SEE IN THIS APPLICATION.

WHAT WE NEED TO DO IS CONSULT IN DETAIL WITH THE PARISH COUNCIL, WHICH IN ITS LOCAL GREEN SPACE APPLICATION HAS CONSIDERED EVERY FIELD IN QUESTION AND ASSESSED ITS LANDSCAPE AND VISUAL SIGNIFICANCE. ALTHOUGH THE PARISH MAY HAVE BEEN SEEN AS ATTEMPTING TO STOP ALL DEVELOPMENT ON THE LECKHAMPTON FIELDS, THAT IS NOT THE CASE. IT HAS ALWAYS BEEN PREPARED FOR A MATURE DEBATE ABOUT SELECTING THE MOST IMPORTANT AREAS FOR PROTECTION AND IF THE JCS AUTHORS HAD CONSIDERED ITS LOCAL GREEN SPACE APPLICATION AS PART OF THE JCS, RATHER THAN RELEGATING IT TO THE CHELTENHAM LOCAL PLAN WHICH HAS YET TO BE ADDRESSED, THEN THAT DEBATE COULD HAVE TAKEN PLACE A YEAR AGO WHEN IT WAS SUBMITTED, AND WE WOULD NOT BE IN THIS POSITION TODAY, WHERE IT WOULD BE ILLOGICAL, UNWISE AND UNSOUND TO ACCEPT THIS APPLICATION FOR 650 HOUSES.

Dr Adrian Mears
Leckhampton with Warden Hill Parish Council

In 1993, the planning inspector said the Leckhampton Fields should be protected from development - *'because of their varied topography, landscape history, dense network of footpaths, and pedestrian access from several residential districts.'* And he said that *'it would be very sad indeed if development were to proceed at Leckhampton.'* In 2003, an expert study commissioned by the Borough Council reached the same conclusion suggesting that the land might be incorporated into the AONB. In 2012, the JCS Landscape, Visual Sensitivity and Urban Design report also showed how special this land is - far more so than any other site considered in the JCS, including Highnam where no development is proposed though it is not green belt.

The Borough Council has defended the fields for decades, and rightly so. It was the RSS that recommended building, and this carried through into the JCS. But the RSS was wrong and was revoked.

In August 2013, Leckhampton with Warden Hill and Shurdington Parish Councils jointly submitted a Local Green Space (LGS) application to safeguard the fields from inappropriate development. It predates the Bovis-Miller application. It was accepted as an input to the JCS consultation. But it was then wrongly set aside. Cheltenham Borough is committed to urgently address the issue. However, that will become impossible if you allow this planning application.

In working on the local green space, we have assessed the value of each field, both in itself and in how it affects the view from eight main viewpoints along Leckhampton Hill and Charlton Kings Common. Because the proposed development would build on the field north of Lotts Meadow and the land between Lotts Meadow and Kidnappers Lane, it would spoil the most important views: from the Devil's Chimney and the observation table. As Natural England says, it will no longer be a predominantly rural view across the Severn Valley, but instead a view across urban Cheltenham. The view from Leckhampton Hill is nationally famous, it is valued by local people, it draws tourists to Cheltenham and it adds greatly to our reputation that attracts employment. It must be protected but it seems to have been ignored.

In 2012 and 2013, in our neighbourhood planning, we did 35 days of traffic surveys in the peak morning period and modelled the traffic queue on the A46. Modelling the A46 is easy. The Moorend Park Road junction limits the flow into Cheltenham to about 14 vehicles per minute. Above this limit, extra traffic builds up as a queue. The 650 houses would create 390 extra vehicles in the peak period. If half go in each direction, 195 add 1 mile extra to the A46 queue into Cheltenham. Many drivers will then decide at Shurdington to divert onto Leckhampton Lane to by-pass this long A46 queue. This extra traffic will choke

Final version

Church Road. To discourage this, the developers propose using complex chicanes to impede the traffic. But, according to the Department for Transport, chicanes cause more accidents and are only justified to reduce speed to save lives, primarily in built up areas. It is vital to avoid Church Road choking. It handles 1300 vehicles in the peak morning period and you cannot afford that to go through central Cheltenham. But there is no robust solution. And even if it works for the 650 homes, it will not work if you add the other proposed developments at Leckhampton and Brockworth.

I should point out that on page 139 Gloucestershire Highways amazingly claim they do not understand the modelling. Tellingly, they also describe as a 'gross exaggeration' a minor point which they admit is a lack of clarity in their own highways plan. To me this suggests they are desperate to avoid the evidence.

The traffic assessment still leaves it all far too vague. Entran have detailed other problems, including the unrealistic assumption that the Travel Plan Measures proposed will be 100% successful. It will be bad for our local economy if we make it very difficult for people to commute into Cheltenham on the A46. And because the other developments at Leckhampton and Brockworth proposed in the JCS add to the traffic problems, this application if allowed could pre-empt these, including at Brockworth. This also seems to have been missed.

In summary, I urge you to reject this application. It is very strongly opposed by residents. It is gravely and unnecessarily destructive of local amenities and beautiful landscape including the view from Leckhampton Hill. The traffic problems remain very serious. Allowing this application would pre-empt other developments. And it would reject the Local Green Space application without any proper consideration.

Thank you.

✓) Hugh Lufton, Lufton & Associates, Planning
Consultant on behalf of LEGLAS

NOTE: ONLY THOSE PARTS NOT STRUCK
THROUGH FROM THE SPEECH DELIVERED
TO THE PLANNING COMMITTEE



Thank you Chairman

Hugh Lufton - Planning Consultant Chartered Town Planner - representing LEGLAG.

Limited time to address committee – like to refer members to the
Submitted 'Blue Pages' **submitted - Grounds for Refusal.**

Obviously this is a significant proposal for Cheltenham – it will have significant
impacts on the locality – the AONB – the local road network – services.

But approving this application NOW would have a significant impact on prejudicing the
whole direction of planning for town.

HOUSING SUPPLY

Of course we want to ensure that the future population have good housing – and a
choice of housing.

Good planning and good planning decisions are about housing in the right place and at
the right time.

Should not just be when the development industry see a profitable opportunity and a
hiatus in the Development Plan.

5-year land supply –

Much is made of the government's policy about - ensuring a 5 year land supply - one
of the most contested issues at appeals.

5 year supply - Must not be the only consideration – assure you elsewhere it is not –
Secretary of State himself has recently refused applications – where this '5-year land
supply' is only 0.7 years Land off Glebelands in Thundersley in Essex – a recovered
appeal – July 2013.

There is housing land in Cheltenham – Housing Land supply show there is planning
permissions for 2,000 dwellings on the ground now in the Borough.

Council can update.

4.7 years in Cheltenham Borough.



PREMATURITY

Everything about this proposal feels rushed and pushed.

Your JCS at Pre-Submission is a Plan for the future of the Boroughs to 2031 not 2020 not 2015.

I understand that Full Council on 9th April were still looking at evidence about the overall housing numbers and at 28th February Full Council resolved to remove Leckhampton as a JCS Strategic site.

This proposal is a major component of that Strategy and if approved now prejudices that JCS process that's simply not yet concluded.

JCS has not been through Public Examination.

NOT A COMPREHENSIVE PROPOSAL

This proposal is uni-lateral just one part of a strategic allocation.

There's no substantial evidence of the landowners/developers working together. No joint Masterplan.

There can't be assurances that necessary infrastructure can be delivered adequately – across the much larger strategic allocation.

Been very clearly envisaged by the LPA's for this location to in anyway be acceptable in must be a comprehensive scheme,

ENVIRONMENTAL STATEMENT UNDER-ESTIMATES THE IMPACT

The ES accompanying application under-estimates the env. impacts.

Substantially under-estimates the landscape impacts and visual impacts to and from the AONB.

STOPPED

~~In under-estimating these impacts what the ES is saying is that this site is much more influenced by the adjoining urbanity of Cheltenham than it is any the AONB and the broad countryside. This is not true.~~

~~The LVIA assessment and description of CA1 and CA2 land units (CA1 particularly) continually refers to them as 'already heavily influenced by urban edge land', 'urban edge land uses', 'urban characteristics and unmanaged / neglected landscape' and 'urban fringe land uses... surrounded by built development'.~~



~~These descriptions are used at~~

~~**paragraphs 6.5.4.1, 6.5.4.2, 6.5.5.2, 6.5.8.1, 6.5.8.2, 6.5.8.8, 6.5.8.10, 6.5.9.1, 6.5.9.2, 6.5.9.3, 6.5.10.4, 6.5.10.5, 6.5.10.6, 6.6.3.1, 6.6.3.2, 6.6.3.4, 6.6.9.3, and 6.7.2.1.**~~

~~Proposal offers lots of mitigation but to mitigate substantial development you need to plant lots of trees and if you plant lots of trees all the views to the AONB from the south of Cheltenham will be lost.~~

~~I understood that this Council strongly protected the integrity of the AONB~~

TRAFFIC, TRANSPORT AND HIGHWAYS

~~Refer to Statement made by ENTRAN - Blue Pages.~~

~~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%~~

~~Local impacts and wider cumulative impacts on network from this proposal and other pipeline developments and SA's. All impact on network.~~

~~Critically the HA doesn't consider impacts at junctions are severe because it assumes all TP measures will be successful. Very optimistic modal shift to sustainable modes.~~

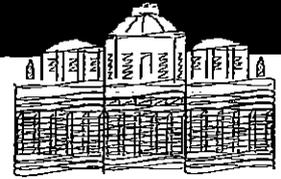
~~Entran don't agree impacts on Kidnappers Lane are minor.~~

~~Serious ? of TA accuracy. ? of HGV flows that are wrong.~~

~~Entran also seriously ? the pedestrian and cycle infrastructure will cope and this is a requirement for modal shift.~~

~~Just not assured at all that this proposal is in the right place and absolutely not assured it's at the right time.~~

[Read out at committee by
Martin Horwood MP]



CHELTENHAM
CHAMBER OF COMMERCE

CLlr Garth Barnes
Chair
Cheltenham Borough Council Planning Committee
Municipal Offices
Promenade
Cheltenham
GL50 9SA

31 July 2014

Dear Mr Barnes

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 - 13/01605/OUT

The Chamber of Commerce has studied the detail of the above outline planning application. However we do still have the same concerns over large scale development in Leckhampton affecting the southern access to the town as stated in our JCS letter of 9 February 2012. The allocation of over 650 houses potentially increasing to over 1,100 in the Leckhampton area will without doubt worsen the existing traffic congestion along the A46. Whilst the addition of two extra sets of prioritised traffic lights and T junction to provide access for the new development will by the applicant's own admission create longer and slower traffic queues, putting junctions beyond capacity.

- we would like to ask that a detailed master plan is produced prior to approval whilst more detailed traffic modelling is carried out together with some analysis on opportunities for job creation
- we note the transport assessment and highway mitigation work to date highlights future problems on junction capacity across the area. By 2023 it is anticipated that the number of junctions which will be 'over capacity' will increase from 150 to 1500, together with travel times which are increased by 40% thereby creating even longer and slower traffic queues. This all impacts on local business and our ability to attract new business to the town

Contd/...

- WORKING FOR BUSINESS
- PROMOTING CHELTENHAM
- CREATING NETWORKING OPPORTUNITIES
- PROTECTING OUR ENVIRONMENT

President

Secretary

Contd/2...

It is therefore understandable why large scale development to the south of Cheltenham is of real concern to the business community and could adversely affect both existing businesses and future relocations to the town. Good maintenance of access to the town from the south is vital for a successful high level strategy but unfortunately the current level of JCS traffic modelling in the assessment of development of Leckhampton has some perceived gaps. Keeping a free flow of traffic on the A46 to the south of the town, providing the motorway link from junction 11A, is we believe vital to the wellbeing of commerce. Worryingly the traffic and transport analysis work documented in the transport assessment to date shows that the highways network to the south of the town is finely balanced with junctions likely to be at full capacity in the near term without this additional development.

To restate one of our principle concerns of our February 2012 letter, creating housing without the necessary employment opportunities, will make Cheltenham even more of a commuter town, serving the rest of the region and beyond. Cheltenham is an extremely attractive town and it is no surprise that people want to live here. It is therefore important that there is an appropriate level of employment which supports both existing and new residents. Unnecessary congestion on a major road network is certainly not conducive in assisting this objective.

We note the Leckhampton green areas are highly valued by both residents and visitors alike and widely recognised as a sensitive area when considering development, providing not least access to Leckhampton Hill. In addition we would question whether employment opportunities have to date been explored around both eco-tourism and agricultural research with our local Universities.

Our request is that this application at least be deferred until more detailed traffic modelling has been completed under the JCS, enabling the Planning Committee to take a more informed view upon the impacts raised both in this letter and by other concerned parties.

Yours sincerely



Michael Ratcliffe
CE Cheltenham Chamber of Commerce