

APPLICATION NO: 20/01788/FUL	OFFICER: Miss Michelle Payne
DATE REGISTERED: 16th October 2020	DATE OF EXPIRY : 15th January 2021
WARD: Leckhampton	PARISH: LECKH
APPLICANT:	Miller Homes
LOCATION:	Land At Shurdington Road Cheltenham
PROPOSAL:	Full planning application for residential development comprising 350 dwellings, open space, cycleways, footpaths, landscaping, access roads and other associated infrastructure

REPRESENTATIONS

Number of contributors	149
Number of objections	140
Number of representations	7
Number of supporting	2

35 Wells Close
Hatherley
Cheltenham
Gloucestershire
GL51 3BX

Comments: 12th January 2021

I am resident in Warden Hill and I am concerned about the disposal of sewage into the same system as we use here which already takes the additional sewage from the Redrow House building on Farm Lane. The new school being built on Kidnappers Lane also means more traffic on Shurdington Road already busier from the Redrow Homes .

These issues need to be solved , people need homes but their surroundings and facilities need to be addressed so that the area can cope without causing horrid problems for those in established homes already in the area .

42 Merlin Way
Cheltenham
Gloucestershire
GL53 0LU

Comments: 7th January 2021

As per the flyer sent out, please note our comments reference the above.

We have concerns that with the increase in people using the public footpath that runs along the boundary of Merlin Way / Hatherley brook to access Burrow playing field and Lotts meadow, that the natural hedgerow that runs along this boundary will be destroyed even further by people and dog walkers not using the correct access points and making entries through bushes and hedgerows.

55 Farmington Road
Cheltenham
Gloucestershire
GL51 6AG

Comments: 15th December 2020

Object based on the impact of the proposed road network, particularly due to multiple failures against modern design standards (LTN 1/20), and severance of routes to new school for high risk road users (children) travelling to this education establishment.

Safe and effective cycle and pedestrian links are vital in this area, as established in Policy MD5 Leckhampton. The construction of the new school will significantly increase the number of vulnerable road users in the area, particularly children and young people travelling by cycle and foot. The success of the approved transport plan also relies on significant active travel use to the school.

In previously circulated documentation, shown on the Gloucestershire County Council website, Kidnappers lane is shown as part of a vital active transport corridor (<https://www.gloucestershire.gov.uk/media/2090385/footways.pdf>), with continuous segregated pedestrian and cycling infrastructure to and along the A46 and into Woodlands Road, supported by a Toucan crossing. There are no points of unprotected conflict between children and vehicles travelling into the residential area and to the school.

The proposed scheme instead introduces a new main roundabout, fails to make provision for adequate continuous cycle routes to the school, and introduces at least two points of unprotected conflict between children travelling on foot or cycle, and motor vehicles. The proposed road infrastructure will significantly increase risk of injury and fatality to children travelling to the school.

Specific risks;

1) There is no cycle route that meets the standards of LTN 1/20 between Woodlands Road and the School. Specifically, they are not 'coherent', 'direct' or 'comfortable', and are of insufficient width to accommodate mixed pedestrian and cycle use at peak times.

2) The introduction of a roundabout introduces a major hazard for cycle users, particularly due to the lack of protected parallel routes. As a normal roundabout with flared approaches, it scores 0% (Critical fail), indicating a high risk of casualties. This is compounded by the limited number of arms and wide approaches meaning vehicle speeds are likely to be above 20mph on approach. This is a dangerous piece of infrastructure to children and young people accessing the school, particularly as the lack of a legible and direct alternative route incentivises people cycling to use the road network. Either an alternative high quality route, or a signalised junction with protected turns is required. A roundabout is not safe for a junction with high numbers of young cyclists, and is against LTN 1/20.

3) The use of the vestigial element of Kidnappers lane from the A46 to the West of the proposed roundabout introduces an unprotected crossing for pedestrians and cyclists a short distance from the roundabout exit. Particularly during school drop off/pick up, this area will see intense vehicle activity, and the road creates severance of a safe route.

4) The exit point onto Kidnappers Lane at the Southern margin does not connect to safe cycle infrastructure, and the narrow lane will represent a high risk final step for children accessing the main school entrance as drawn. Again, there is also no protected crossing provision at this point for children using cycles.

5) It is unclear how the proposed 'middle' north crossing (closest to Hawkswood Road) will connect to continuous safe cycle infrastructure. If this connection is not made, it will mean children are required to travel on roads, either to reach the West or East entrance. Given high volumes of cars at drop off and pickup, this has substantial risk.

6) There is heavy reliance on shared use paths throughout the scheme, including the main desire lines. This is advised against by LTN 1/20 6.5. Path widths are generally unsuitable for mixed cycle and pedestrian use, particularly given the intensity of use created by school access. LTN 1/20 would recommend a continuous provision of a fully segregated cycle lane of at least 3m width, with separate pedestrian facilities, or if (against guidance) a shared path is used, it should be of width at least 4.5m to avoid conflict and enable accessibility.

In summary, despite the claim in the transport statement that the scheme delivers 'excellent pedestrian / cycle permeability in the local area', none of the elements proposed deliver to current design standards. In particular, the failure to create segregated and continuous protected facilities for pedestrians and cyclists, and the introduction of major new hazards (roundabout, and unprotected crossings) means that children and young people will be continually exposed to unnecessary risk.

The scheme should not be allowed to proceed without demonstrating a solution compliant to LTN 1/20 standard for users on all approaches and transits.

Comments: 26th September 2021

Many thanks for the opportunity to comment again on these plans. My objection is specific to the sub-standard cyclepaths provided through the scheme, particularly the vital north south link from the crossing to the new Leckhampton School.

The school transport plan anticipates at least 1000 users along this path during peak hours, including potential for a high proportion of cycle users if appropriate connecting infrastructure is delivered. As proposed, this is a 3.5m wide cyclepath is actually a shared use route that will be used by both pedestrian and cycle traffic, particularly children walking in groups, and two way traffic as parents return from having dropped children at the school.

LTN 1/20 (Cycle Infrastructure Design) establishes clearly that pedestrian and cycle users have very different needs, travelling at different speeds. It regards shared use as a 'last resort', particularly when flows are expected to be high (above 300/hour peak, which applies for this route). It also recognises equality risks due to the poor quality of space provided.

This is also reflected in Gloucestershire's new Local Transport Plan (Policy Document 2 - cycle) which states 'that cycling and walking - as two vital active travel modes - should not conflict with each other'.

As such, the proposed 3.5m path is inadequate, and will be a barrier to achieving the transport aims of the development, and the school within the wider development context.

--

The appropriate design solution (LTN1/20 compliant) would be a minimum 3.0m wide bidirectional cycleway that is kerb separated and distinctive from a separate 2.0m wide footway. There is generous space within the development to enable this along a vital transport corridor.

--

Similarly, to the west along Kidnapper's Lane, the proposed pavement widths are grossly inadequate, and will introduce substantial danger when traffic induced by school pickup and drop off is introduced. These should be resized to accommodate appropriate active travel infrastructure, with consideration given to extra protection given the high likelihood of pavement parking and turning vehicles during busy school periods.

Given the potential popularity of the route, some public Sheffield stands on hard standing should be considered at key points (such as the emergency link intersection), to enable visiting cycle users to enjoy the additional amenity provided by the development.

Finally, the proposed roundabout is of a significantly car-dominant design, with wide geometry that facilitates vehicles maintaining high speeds around footways that will carry high numbers of children. The preferred solution in current guidance would be a signalised junction, and at the very least, tighter geometry that designs in appropriate slowing and speeds will be more appropriate in this development.

45 Princes Road
Cheltenham
Gloucestershire
GL50 2TX

Comments: 16th December 2020

I object to this application.

I have extensive experience of defending the Leckhampton Fields from unsustainable development and my take on this latest application is as follows.

The case in support of 350 homes is strong and is based on the fact that the application is supported by the Cheltenham Plan, 40% of the homes will be 'affordable' and the Borough has consistently failed to deliver its legal requirement for a 5 year housing supply, making any outright objection extremely difficult to make.

However, a very good case can be made that the Joint Core Strategy highlighted the need to protect the area's Valued Landscape and that only about 200 houses should be built. The current application includes two fields, known as R2 and R3 in the JCS, which the Inspector said should not be built on. To do so, would adversely impact Valued Landscape and increase local traffic congestion, which will soon have to contend with the new secondary school (which I support incidentally, as do many within the community), which was never addressed within the JCS because that strategic requirement for more school places did not 'officially' exist at that time.

Although this approach would theoretically mean 150 less of our much needed houses, that reduction is not so great in practice, as the Berry's Nursery will now have 25 dwellings and the Bovis land about half that number.

Legitimate flooding concerns would also be mitigated if the full 350 houses were not built.

It will now be up to the CBC Planning Committee to listen to the public and consider all the pros and cons, with a view to rejecting this application until a new design is submitted, based on a more reasonable and smaller number of houses. That would also have the added advantage of allowing even more green space between the new houses, in keeping with the natural beauty of the whole area.

47 Merestones Drive
Cheltenham
Gloucestershire
GL50 2SU

Comments: 17th December 2020
Objection.

9 Naunton Lane
Cheltenham
Gloucestershire
GL53 7BN

Comments: 13th January 2021

I object to this application as there is not strong enough evidence of infrastructure within the local area to support this.

5 Merlin Close
Cheltenham
Gloucestershire
GL53 0NF

Comments: 13th January 2021

I object strongly on the following grounds

1 Traffic - queues presently 1 mile long at the M.Park Rd traffic lights. This development plus the High School should not be allowed.. Shurdington Road a main access road to both the M5 and M4 - bad for business in Cheltenham

2 Pollution Levels These very high, particularly again on M.Park Road. Waterford Court has many elderly residents - unacceptable levels of pollution for them very bad indeed.

3 Biodiversity - Effect on many species of wildlife

4 Loss of amenity - Further erosion of green spaces for residents to have access to

13 Rochester Close
Cheltenham
Gloucestershire
GL51 3DJ

Comments: 14th January 2021

We are writing to object to the above planning application on the following grounds.

1. Increase of traffic from all the new homes. The Shurdington Road is at capacity several times a day already making moving around the area slow and frustrating as well as increasing the air pollution. If a further 350 homes are going to be built with each house on average having 2 cars this will further exacerbate the problem for everyone. No one will be able to get anywhere at certain times of the day. This is without the increase of traffic in the area of a new school.
2. Where will all the water from these house go? With tarmac and gravel mostly replacing green fields, runoff water will all be making its way onto roads to further increase the problems already experienced in the surrounding areas. We realise that drainage will be incorporated into the plan and hopefully will address our concerns but experience shows that it is not always sufficient. We also are aware that there are green spaces planned for the development but this does not replace the existing fields. We realise that further development is needed to cope with housing pressures but does so many houses need to be put in one place.
3. The doctor's surgery is over subscribed with patients now are there any provisions for the new residents of these houses. We apologise if this information has been covered in the planning documents but because there are so many of them we have only looked at the most relevant of these.
4. We are aware that our comments probably won't make any difference to the final outcome but feel that we had to make our concerns known. We love living here and want to continue to do so along with others but are not sure that this new development will improve the area's appeal if the number of houses on the plan comes to fruition in the future.

8 Allenfield Road
Cheltenham
Gloucestershire
GL53 0LY

Comments: 14th January 2021

I wish to object strongly to the proposed development by Miller Homes, which is planned for one of the last rural settings off Shurdington Road in Leckhampton.

Having lived close by for over 30 years I am alarmed that the council will accept proposals to build upon a much loved walking route for many in this area. The land provides a beautiful green space with old orchards, animal grazing and market gardens.

The proposed development of 350 houses will urbanise the area creating a large increase in the traffic and pollution on Shurdington Road. This is hugely problematic now!

The houses will be crammed in to a small space and cause further strain on local doctor's surgeries and schools. Leckhampton has already played victim to Tewkesbury Councils development off Farm Lane, taking away recreational amenities and blighting the landscape with ugly development.

Previously the number of proposed houses of the Shurdington Road was 200, now this application has reverted to the numbers on an earlier application which requested permission for 350 houses. Greed on the part of developers?

There are many brown field sites in the centre of town, not so easy for developers to build upon, I feel the council should have a strict policy for encouraging domestic use and for these sites to be developed, rather than our centre becoming a derelict ghost town. The proposed Leckhampton development just adds to the loss of recreational land and constitutes further concreting over of our landscape.

Please think very carefully over the plans that have been submitted and save this much loved and used area from planning blight.

PS might I also add that the proposed development will seriously affect the local wildlife population, including deer and woodpeckers

Comments: 1st October 2021

I want to object to the proposed development by Bloor Homes of 350 houses close to the Shurdington Road. The number of homes is excessive and subsequent increase in traffic will add to congestion and air pollution. The loss of rural landscape and wildlife will be significant. I have found it difficult to navigate your website but would like my objections to be recorded.

55 St Michaels Road
Cheltenham
Gloucestershire
GL51 3RP

Comments: 14th January 2021

This is such a beautiful area. We've had enough building round here now.

The roads are already too busy, (Out of the pandemic) the pavements along Shurdington Road are too narrow for more foot traffic without a lot of adjustments. I used to get the bus daily when I lived over in Stroud and just the slightest issue like a broken down car could add an hour onto my journey.

These fields are full of nature. On one walk I saw 6 different deer and a whole host of different birds. We have newts in our new wildlife pond just down the road I wouldn't be surprised if they came from here. I hadn't seen a newt for years!

These fields have never been over farmed as they were just small holdings before. They are full of life. This would be the perfect area for a woodland that could be made accessible for the elderly and disabled who might find Leckhampton too steep and inaccessible. We have no accessible woodland near town.

Many people exercise themselves, children, dogs and horses in this area we need to encourage this and the connection with nature. Not fill it with houses.

What a beautiful area this could be to learn in for the students of the new school and Leckhampton and Warden Hill schools.

Please consider the life that all ready lives here both the people who use these fields for pleasure and the nature who call these fields home.

22 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 17th January 2021

The extra houses will result in extra traffic congestion on the a46 and other roads

28 Wisteria Court
Up Hatherley
Cheltenham
Gloucestershire
GL51 3WG

Comments: 27th January 2021

I believe this amount of housing would cause further traffic issues on shurdington road and more so on bath road, unless properly managed.

Brockworth Community Centre
Court Road
Brockworth
GL3 4ET

Comments: 20th January 2021

Brockworth Parish Council considered this application at its Planning Highways and Environment Committee meeting on 16th December 2020.

After considering the proposed plans the Brockworth Parish Council strongly OBJECT to this application due to the cumulative and negative impact it would have on traffic, highways safety and congestion along the A46 travel corridor, which extends as far and impacts negatively on Brockworth residents.

Comments: 16th September 2021

Brockworth Parish Council's Planning & Highways considered the revised plans at its meeting on 15th September 2021.

The Committee considered these revised plans and agreed to continue to OBJECT to this application in the strongest possible terms for the following reasons:

This development would result in significant impact and pressure on local infrastructure and there is inadequate provision of local facilities to support health, education and transport for the growing population, impacting the wider area.

There is a lack of cycle provision from the site to the wider area. We would request that safe cycling and walking routes along the Shurdington Road route is considered linking new development to Cheltenham, Brockworth and Gloucester providing a safe alternative to car use.

This development would have a negative and cumulative impact on traffic, highways safety and congestion along the A46 travel corridor which extends as far as and negatively impacts on Brockworth residents.

The committee fully supports the stance, arguments and evidence provided by Leckhampton Parish Council.

92 Shurdington Road
Cheltenham
Gloucestershire
GL53 0JH

Comments: 4th May 2021

We strongly object to the development by Miller Homes. Our property is adjacent to Hatherley Brook and, as mentioned by other people, we are also extremely concerned about the impact on flooding risk from the proposed development. It has already been well-documented that Hatherley Brook is prone to bursting over its banks following heavy rain and with climate change adversely affecting weather patterns, it is likely to increase the chance of this in the future. Adding a significant development of houses on this land will increase water run off and remove the ability to use this land to hold back flood water in the future.

We feel it is of paramount importance that the flood risk to properties near Hatherley Brook is taken into strong consideration by the planning team.

We urge you to object this application by Miller homes

Comments: 28th September 2021

We sent in the comments below relating to the above application after the closing date for comments earlier this year. I note our thoughts are not published on the list of responses to the planning application online. Please could you confirm that they will be taken into consideration when reviewing the application by Miller Homes? We are still, like many local residents, extremely concerned about the impact the new development could have on flooding risk to local homes. I can't see any reference made to this concern in the revised documents. Please could you point me towards any further work done on this, in case I have missed it?

3 Silverthorn Close
Cheltenham
Gloucestershire
GL53 0JF

Comments: 16th December 2020

On the map accessible through Public Access, this development seems to have incorporated the smaller development already under way - roughly opposite Silverthorn Close (GL53 0JF). Details of the existing development appear to have disappeared from the record. Can you advise, please?

Thanks

Comments: 30th September 2021

It's a pity that the developer has not used the time available to make other than cosmetic changes - a large number of 'revised' drawings does not equal a large number of significant changes - quite the reverse.

For example, although the proposed link to Merlin Way is useful, much more useful would be a proposal to get foot and cycle traffic heading for the new secondary school off the Shurdington Road at the earliest opportunity (by eg linking a revised foot/cycle path to a new north-side foot/cycle path beside the A46 provided by others).

There is no proposal to upgrade the heating systems in the proposed houses, despite the announced and rapidly approaching withdrawal of gas heating appliances and the strong and growing emphasis on global warming. Also on a 'green' note, less than a third of the houses are provided with EV charging points.

On the specific issue of road safety, there is no proposal to connect the enclosed small Kendrick development's road system with Miller's - thus removing Kendrick's unnecessary access point to a narrow and very busy section of the A46. It must surely be within the planner's remit to force everyone (both Kendrick and Miller developers) to use the far-better placed and bidirectional Miller east access point.

There appears to be no commitment in the proposal for the long-term maintenance of SuDS. There is no mention of safety to children near the SuDS ponds.

Where is the foul water strategy to be found? - with the undoubtedly increased flood risk, this is of great interest to residents 'downstream' of the development, if not to the developers themselves.

Comments: 3rd October 2021

No provision has been made to add a 'turn right' lane to the A46 when approaching the 'eastern' access point to this development from the west (ie, approaching Cheltenham). Without such a lane, the already-congested A46 will be brought to a standstill on many new occasions.

The access envisioned for the separate Kendrick development only makes this situation worse...do we really want more chaos on an already overloaded road: please ensure it's integrated with the Miller road system as a condition of grant!

11 Nourse Close
Cheltenham
Gloucestershire
GL53 0NQ

Comments: 5th January 2021

I strongly object to the scale and nature of the project.

Whilst I am all for new housing developments the infrastructure is not and still shall not be in place to support the demand and such a growth in the surrounding areas.

We have had two major developments in the area within the last two years which are still to be finished where we still do not know to true scale and impact of these and shall not be fully realised until completion

We have the Redrow housing estate and the new school being built which is already causing problems due to the current structures in place. The plans submitted shall not improve this. The A46 / Shurdington road, bath road are currently bad enough as it is and farm lane & kidnappers lane are too narrow to support continual traffic in both directions. Its hard enough having the roads resurfaced which are horrific and this shall only make matter worse than they already are.

The landscape itself shall be ruined, the proposed types of houses do not fit in with the surrounding areas and as per the above the major developments within close proximity and residents shall also suffer due to the new developments not having suitable / sufficient space for the amount of vehicles required to be parked. (we are already being asked about staff of the school being able to park in the residential areas which shall no doubt be the case for pupils when fully up and running)

Common sense needs to be taken in to consideration regarding flood risk. It is in a potential flood risk zone due to the location of Hatherley Brook which runs straight through the middle and is situated next to Lotts Meadow in the south, and Robinswood and The Northern Fields in the north. We see homes in Tewkesbury underwater enough of which in recent times we see our local residents of warden hill / hatherley being effected due to the drainage systems not being able to cope.

The "protected" land has already been developed enough, this needs to be thrown out.

16 Rochester Close
Cheltenham
Gloucestershire
GL51 3DJ

Comments: 13th January 2021

As with many of the comments that have been made i would agree:

*shurdington road is gridlocked most morning now so adding another 500+ cars to the mix will make the issue worse.

*this land is currently left predominantly 'wild', where will the deer,foxes,badgers,bees,birds etc etc all go? their habitat has already been squeezed.

*are the drains/sewers being upgraded in the surrounding area to cope with the extra waste?

*houses that are being proposed are going to be 'real world affordable'? or the £200,000+ 2 bed affordable?

19 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 20th January 2021

It seems surprising that 350 new homes are being considered in an area that has just been inundated with new homes.

The traffic is already horrendous.

The air quality is poor.

There is already danger of flooding in this and surrounding areas during periods of heavy rain.

I would oppose this development for the above reasons.

Little Gables
Well Place
Cheltenham
Gloucestershire
GL50 2PJ

Comments: 29th January 2021

I am absolutely appalled that there continues to be a desire to build on this agricultural land below the Cotswolds. This is an area that should be used for farming and horticulture not housing ...and on doing do provide a green amenity to the town.

5 Arden Road
Cheltenham
Gloucestershire
GL53 0HG

Comments: 11th December 2020

I would like to express my agreement with the comments and objections made by Leckhampton and Warden Hill Parish Council.

My particular concerns relate to the large increase in traffic which will be generated by the proposed development, not just on the A46, but especially along the Bath Road, and area which is already overburdened and which suffers from traffic fumes and poor air quality.

I also object to the inclusion of areas R2 and R3 in the proposed development. Building on these sites would destroy attractive countryside which provides a great amenity for local people, as a walking route, as well as taking away fine views towards and from Leckhampton Hill.

3 Merlin Close
Cheltenham
Gloucestershire
GL53 0NF

Comments: 17th December 2020

Three storey buildings will not be in keeping with houses in the local area
Path -many residents use the footpath and our green space will be converted to housing and concrete
Small holdings that residents and their families have enjoyed for decades looking at animals will be destroyed
Allotments have been reduced to such a small size I would like this to be increased
Traffic on the a46 is already a problem during rush hours and this will be made worse.
Flooding is already an issue and the concrete drives will cause more run off aka therefore more flooding
Pollution with more cars and more heating will affect our clean air
Crowded roads and pavements will be made worse
The houses themselves look very close together and I would like to see less houses and more space.

9 Hidcote Avenue
Up Hatherley
Cheltenham
Gloucestershire
GL51 3FB

Comments: 17th December 2020

For the sake of our youth we need more houses. We need them desperately. For those worried about drainage then engineer away the problem. For those who are worried about the extra traffic pollution in 5 years we will be more electric that combustion engine, and there is a good chance we will be getting in and out of driverless cars to get us from a to b. To the climate argument how many leap on that to prevent developement, and the prosperity it brings, and yet still have gas central heating and no solar panels on their roof. No to nimbyism and build please.

Waterwood
Merestones Road
Cheltenham
Gloucestershire
GL50 2RS

Comments: 4th January 2021

Letter attached

49 St Michaels Road
Cheltenham
Gloucestershire
GL51 3RP

Comments: 14th January 2021

I object to the proposal on the following grounds:

Traffic and Pollution

Shurdington Road is already extremely busy at peak times and the number of homes planned in this development (350), alongside other developments including the Redrow development (370) mean that the congestion and associated air pollution and noise will be further increased. The addition of the roundabout will only further delay traffic making the noise and pollution for local residents worse. The proximity of homes to the road is poorly considered, and the footpath on Shurdington Road near to the crossing point is very narrow causing a danger to pedestrians and cyclists. Particularly as this is likely to be a key route used for the new Secondary School, and also a route used for access to local shops and amenities in Warden Hill.

Wildlife and Human Environment

The land is currently green space and used by a diverse range of wildlife, including deer, foxes, bats and many bird species. The network of paths is heavily used and enjoyed by people including myself on the South side of Cheltenham. I am concerned that the density of proposed housing and minimal green space will negatively impact the current residents, wildlife, and those in the proposed new housing. The green spaces and associated paths should be wider with consideration for cycleways that connect more effectively to the surrounding area and at the same time provide an opportunity for wildlife to exist. The development appears to be piece meal without due consideration for existing or future development in the area. In particular the green areas do not connect within the development, and I have struggled to find any indication of how wildlife corridors and by association footpaths and cycleways would connect effectively in the future.

The previous application for the development of 650 house by Miller and Bovis Homes on this site and adjacent area was refused on the basis of severe cumulative traffic congestion and damage to the landscape. Breaking up the application and attempting to get it through does not change the underlying issues, especially given the other ongoing developments in the area.

17 Chelmsford Avenue
Cheltenham
Gloucestershire
GL51 3DL

Comments: 13th January 2021

Research regarding long term impact on travel on the Shurdington Road insufficient to convince me that this will have anything other than a negative impact on the local community. I see nothing in these manicured plans to compensate for the loss of habitat for local wildlife.

23 Lichfield Drive
Cheltenham
Gloucestershire
GL51 3DQ

Comments: 13th January 2021

I strongly object to the proposed building of 350 new house on the land at Shurdington Road by Miller Homes for the following reasons:

Flooding:

As a resident of Lichfield Drive, Warden Hill, flooding is a major problem here already. The garden of our property floods severely everytime we have heavy rainfall, as the rainwater runs down from the Shurdington road. On 23 December 2020, my partner and I spent 4.5 hours outside, continually bailing buckets of water out of our garden to prevent the flood water reaching our house. This was the FOURTH time we'd had to do this in 2020. On this latest occasion, we called Severn Trent to see if there was an underlying problem with a damaged mains pipes etc on our property. The ST engineers visited our property and confirmed that there is no underlying mains issue and the flooding is simply caused by the sheer volume of flood water coming down the hill and that we're just "incredibly unlucky". We have lived at this property for 5 years and the flooding problem seems be getting worse year on year. Shurdington Road has always been notoriously bad for flooding and what with the new Redrow development, and the proposed building of a new school, I am extremely concerned about how much the worse the flooding problem is going to become in future years as more green space is concreted over. I note that many of the mature trees in the field on the stretch of road between Woodlands Drive and Silverthorne Close have already been felled. It is extremely unfair on the owners of properties in Warden Hill and the areas around Shurdington Road that are already prone to flooding, if more building is permitted in this area which will inevitably make an existing flood problem even worse for so many homeowners.

Traffic

The Shurdington Road is an extremely busy stretch of road and is already overly-congested, especially in peak times. The Redrow development and the building of the new secondary school is going to compound this problem even further (please don't try and fool anyone that the children attending the new school are all going to walk/cycle to school; it just isn't going to happen!). Anyone needing to use this road, or trying to exit from Warden Hill estate during peak periods, knows how gridlocked the traffic is already. Should we really be encouraging more cars onto the roads in this area? The pollution caused by vehicle emissions along Shurdington Road is already pretty horrendous. The only upside of lockdown in March/April 2020 was the reduction in traffic along

Shurdington Road and I couldn't quite believe how much cleaner and better the air quality was during that period.

Loss of habitat/green space.

When my partner and I moved to Warden Hill 5 years ago, one of the reasons we moved here was because of the beautiful green space within walking distance of the property. And now it's all disappearing, field by field. As a firm believer in the positive effects of wildlife and nature on our mental health, I believe it should be a fundamental human right for everyone to be able to access wild green spaces, to escape the stresses of our lives, relax and unwind. Although just a stone's throw from the busy Shurdington Road, these fields are packed with an abundance of wildlife, including badgers, foxes, roe deer, squirrels and an array of birds such as buzzards, kestrels, owls, and many of our favourite songbird species. Hatherley Brook provides habitats for newts, frogs and toads and the fields are home to many insect varieties. Where are all of these creatures supposed to go? They have already been squeezed into condensed spaces as it is. At a time when the Government has just declared a climate emergency, we need to make space for our wildlife and leave green spaces for both humans and animals to access and enjoy. This doesn't mean just keeping one manicured playing field or recreation area; it means preserving wild spaces where nature can thrive and humans can enjoy visiting, to relax and unwind. The current proposals will mean the final fields near to where I live will be built on and lost forever. To be able to walk in green space, I will therefore have to jump in my car and drive somewhere first, ironically having to join the the already over-congested Shurdington Road to do so. Climate emergency? Leave your car at home and walk more? This is what some of us are trying to do but continual plundering of our local green spaces is making this impossible. Cheltenham used to be a beautiful place to live. What on earth has happened?

I believe previous applications for this site have been refused on the grounds of landscape value and traffic congestion. So what has changed this time around?

I object most strongly to this latest application.

19 Gordon Road
Cheltenham
Gloucestershire
GL53 0ES

Comments: 24th January 2021

We , the undersigned, protest most strongly against the above Planning Application for the following reasons:-

- 1) The building of 350 dwellings will result in 350 -500 extra vehicles on the local roads. Shurdington Road and Church Road are already very congested at peak times of the day and this Plan can only make matters worse.
- 2) Air pollution will increase dramatically and will be a danger to the health of the local population, particularly children. This is especially important in view of the prospect of the new secondary school to be built in the immediate vicinity.

3) The new school will mean a considerable increase in the number of children on the roads and pavements of the local area thus making it an extremely dangerous environment for them.

4) An increase risk of flooding from the many streams and water courses coming off the hill.

5) The loss of Green Space which, we thought, was protected in the original Local Plan. These Spaces and footpaths are of vital importance to the health and welfare of the population of not only the local people but to Cheltenham as a whole.

This Application must be refused.

144 Hatherley Road
Cheltenham
Gloucestershire
GL51 6EW

Comments: 24th January 2021

I am writing to object to the amount of housing proposed for 350 homes on land near Shurdington Road Leckhampton. I understand the need for more homes in Cheltenham, however 350 homes is far too many.

The area itself is truly beautiful, a real oasis and has never been more used as an oasis of tranquility than in lockdowns. It's accessible for both people of Leckhampton and Warden Hill and home to the most beautiful family of deer.

Both the Shurdington Road and Farm Lane are already far too congested and busy. The increase in traffic and pollution will affect existing residents. There are already huge tailbacks of traffic and this huge number of homes will make this far worse.

I ask you to consider reducing the number of housing and to really consider the impact the housing will have on nearby residents.

I'm so sad to see the plans for this special land to be destroyed.

Comments: 24th January 2021

I ask careful consideration is given and that the number of houses is reduced. 350 is a huge amount that will Irrevocably change Leckhampton. Farm Lane and Shurdington road are already so so congested and there is nowhere else for the traffic to go! Not to mention flooding concerns. Please consider this very carefully as take note of any residents comments you receive.

May I also say that many Leckhampton residents are unaware of the planning process and plans by Miller homes. The consultation process has been very poorly publicised.

Comments: 1st October 2021

350 homes is far too many on this site, which is currently a much valued site of natural beauty where local residents enjoy being able to escape to an open space, without having to drive out of Cheltenham.

The traffic on a Shurdington Road is already nose to tail and the area cannot cater for more cars. Air pollution from the increased traffic is also a worry, particularly as Cheltenham already has high levels of air pollution in comparison to the rest of the country.

For local residents it will really change Leckhampton, making it busy, built up and polluted.

I am also shocked at the lack of public consultation. Many residents directly affected have not been informed of the proposed plans. For a development of this size, and the deeply negative impact it will have on the local area and its residents, proper consultation should be conducted to allow residents to properly air their views.

20 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 16th November 2020

I am writing as a Borough Councillor to request this item is dealt with by planning committee and not an officer decision. This is due to the interest in the near and wider area of the development. This is particularly in relation to highways improvements, density of the development and provision of onsite space for wildlife and humans to play as well as environmental impact of the type of construction.

12 Fairfield Park Road
Cheltenham
Gloucestershire
GL53 7PQ

Comments: 24th November 2020

I object to this planning application - whilst the new secondary school is close by road infrastructure in this area is poor with severe congestion on local roads and the A46. Another significant development in this area will make congestion and pollution worse on already overstretched infrastructure. This significant housing development should be rejected for this reason alone.

Comments: 15th September 2021

These revised plans are nothing more than wallpapering over the cracks of a flawed submission of a significant development in the wrong place from an environmental, ecological & infrastructure perspective.

Congestion, traffic pollution, flooding risk in the area are all reasons why such a significant development should be rejected by the council.

42 Holmer Crescent
Up Hatherley
Cheltenham
Gloucestershire
GL51 3LR

Comments: 1st December 2020

I was really disappointed to see the lack of thought and confused layout/masterplan submitted for this planning application. There appears to be a very limited amount of considered development planning undertaken. It rather looks like the requirement for the provision of a green spine has been seen as a constraint and the development forced in between it and Kidnappers Lane without any attempt to inter-relate the two. The same goes for the interaction with the existing Kidnappers Lane section which is accessed from within the development rather than providing a discrete separate access more aligned to the properties opposite. The development wants to create an entirely new island development which just isn't appropriate and really isn't of any quality that would work in this context. The poor quality residential layout appears to be sandwiched between a green corridor to the north and Kidnappers Lane to the south, taking no visual or spatial planning cues from either to enhance the development. This development would sit happily within any inner city urban environment and be an area to avoid.

Character and street scene changed along Kidnappers Lane

The new access from the roundabout is out of character with the current Kidnappers Lane, this is as a result of the proposed buildings density, character, layout and due to the proximity of properties to the kerb. There is no sense of the existing area and one might assume from this entrance that Kidnappers Lane is no-longer accessed from this point.

It is quite clear why this has happened when you see the Character Area Plan. The road is marked first as a Spine road (not a Lane), then as an internal road (not a Lane) and finally as Kidnappers Lane, with the first few properties positioned unlike any of the existing found along the Lane. This messy confused mix of types and densities all happens within a stretch of 100 metres. The Spine road properties do not blend or complement any of the existing properties on Shurdington Road, they are completely different in density, character and form. This high density low quality continues until the first access where the development then changes to another form of low quality high density affordable homes as if now within a residential setting and not the beginning of the existing Lane. The Lane should be treated as such from the exit of the roundabout, it is not reasonable or appropriate to suggest it is anything but Kidnappers Lane, to suggest otherwise is laughable.

The new buildings should be in-keeping with the current properties on Shurdington Road and then Kidnappers Lane, however, the proposed development could not be more different. The new access road rounds the corner to connect to the original Kidnappers

Lane where some larger houses appear right up to the edge of the highway to create a narrow gateway completely out of keeping with the bungalows and rural nature/street scene along the existing Kidnapper Lane. There is a clear disregard for the existing beautiful nature of the area and the character of residential properties along Shurdington Rd and Kidnappers Lane.

If this developer were to up their game there is far more profit to be made by creating a mix of housing densities appropriate to the area, using the green space to ensure the development complements the existing setting. It is quite obvious that Kidnappers new and old needs to match or complement one another. The proposal could not be further from this and the elevations seem absurd in nature and different to any housing nearby. The elevations show low cost, poor quality housing, which does not complement the area.

General layout poor

The master plan/layout is extremely poor throughout and would benefit from analysis of the existing area. I have circled in red the worst parts of the proposed development. Alleyways leading to secluded rear parking areas and green spaces without any natural surveillance. The green spine is largely unusable and isolated and provides no connectivity to the wider green corridors in the area. The new houses on the new stretch of road from the roundabout to Kidnappers should be of the same standard as the existing properties on Kidnappers. They do not abut the pavement, they are not within 2 to 5 metres of the road, they are not high density. It is a rural low density road with properties set well back from the road. There are 30 to 40 residential properties pushed in, close to a major busy junction, not only will people have to suffer living there but people will have to drive through it. The number of vehicles passing in close proximity to these frontages could result in the need for an Air Quality Management Area, even if this isn't necessary new residents will have poor health as a result of the proximity of these houses to such a busy road. Court yard parking is visible from the road, this is likely to be used as play areas and bin stores similar to those found on Princess Elizabeth. Courtyard parking has been known to be bad practice for as long as 20 years now. The development has so many courtyard areas it is difficult to quantify in number. These will not be used as intended but become barren areas left to be ill maintained and because they have poor natural surveillance will create future policing issues. This is a new gateway to Cheltenham along Shurdington Rd, it is as if the design has been created from a remote desk by someone that has never visited the area... Every current property on Shurdington Rd has its own private driveway to this point, not a shared grass area and it is not within the urban core.

No Consultation

I am disappointed there has been very little stakeholder consultation and no public consultation on this matter. When will the consultation be undertaken by this developer with the local community. I am not aware of any such process having taken place. I would expect this to happen on a development of this scale. This is a requirement not an option, they need to demonstrate this process has been undertaken. I look forward to the event in the coming weeks. COVID compliant clearly. I suggest they come along to Burrows Field and take questions. Or provide a portal for interaction.

Summary - A stand-alone development with no relationship with the green spaces or existing residential areas

Given the beautiful surroundings and existing quality of the adjacent residential properties this development needs to blend not stand alone. This is inappropriate in every way in its current form, particularly given the new access realigns/stops up part of Kidnappers and creates a new section. This is an opportunity to create a high quality entrance to the development which continues through to the new school and existing residential area. The most disappointing thing about the design is that there is so much wasted land and space. Unfortunately what you will see is a mess that makes it look over developed and haphazard in nature. Poor quality is put at the gateway of the new main junction on Shurdington Road and the Old Kidnappers Lane is lost to an estate access. Rather than provide a transition from the low density form of Kidnappers Lane the new stretch of road it jumps to poor quality, high density, budget build affordable housing of a residential street and worse still full urban high density blocks. This doesn't work and isn't appropriate. It provides both a poor environment and street scene for existing residents and a poor living standard for the new residents. Affordable homes should be life homes and be of a quality that people wish to live in and complement the existing area. They should not be the cheapest build cost possible, delivered in a way that both reduces their occupants quality of life and blights the surrounding area. This doesn't benefit anyone and isn't necessary in this location. This development has huge potential and this first submission is woefully inadequate. I hope the developers of this site will up their game to meet the high standards Cheltenham as a Town rightfully expects. It may help them further to reduce the total number of houses and develop a better mix in this location.

42 Pilley Crescent
Cheltenham
Gloucestershire
GL53 9ET

Comments: 14th January 2021

There are already too many housing developments in this area impacting on the GP surgeries and schools.

The much needed secondary school is supposed to serve those in the 'Leckhampton Corridor' who are outside of the catchment of Balcarras and soon Bournside.

I expect the developers think they can guarantee their house buyers a place in the desired leckhampton primary (already over subscribed) and the new Leckhampton High School but this should not be the case.

Traffic pollution is also a factor to be considered and the impact on green spaces in Leckhampton/Shurdington.

63 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0BS

Comments: 15th January 2021

We wish to state our objection to Miller Homes application for planning permission for 350 houses on Shurdington Road Leckhampton.

Our precious green belt south of Cheltenham is being systematically chopped away, the wonderful views spoiled for generations to come to say nothing of the ecological issues involved here.

There is also the worry about flooding and our already overloaded roads locally at peak times which will be increased with the new school.

Please do not allow any of this site to be built on.

10 Hobby Close
Cheltenham
Gloucestershire
GL53 0LP

Comments: 15th January 2021

I am a local resident and the impact of this development will affect my standard of living considerably.

Concerns include increased traffic especially on Shurdington Rd which at peak times is very congested already as are Church Rd, Moorend Park Rd Kidnappers Lane. This will only be exasperated by the new secondary school which is very much needed for local children. The primary schools are already oversubscribed and show no evidence of being less so.

350 houses is far too many as the majority of families will have 2 children and 2 cars. I doubt whether any consideration has been given to sustainability- water recycling, solar panels etc. Miller Houses refused to build a primary school on the land which shows their lack of care for the community.

The land although containing small holdings has been deliberately run down for at least the last 20 years and is in need of some sympathetic development. I have always thought an educational farm park would be ideal. Everyone benefits with interaction with animals and learning how to grow food.

I am not naive enough to presume the council has the funds to initiate a project like this but investors could be sought and eventually provide employment and profit.

In brief then too many houses and too expensive for local people.

4 Chestnut Place
Cheltenham
Gloucestershire
GL53 0QE

Comments: 11th January 2021

I object to the above application, as it stands, on the grounds that it will be the cause of severe cumulative traffic congestion and damage to the landscape.

It should be noted that a previous application for the development of 650 houses by Miller and Bovis Homes was refused by Cheltenham Borough Council principally on the above grounds in 2014, a decision which was upheld on appeal by the Secretary of State in 2016.

In terms of the cumulative impact on traffic, although this development has fewer houses, when you add in the effect of the new 370 Redrow houses nearby and the new secondary school in Kidnappers Lane/Farm Lane the impact will actually be greater. The application includes development in fields R2 and R3, which JCS examiner Inspector Ord concluded was unacceptable on Landscape grounds. The R2/R3 area is also part of the area identified by the Secretary of State in 2016 as valued landscape that should be protected and enhanced in accordance with the National Planning Policy Framework (NPPF).

4 Pickering Close
Cheltenham
Gloucestershire
GL53 0LE

Comments: 11th January 2021

I write to strongly object to building further houses in this area. My house backs onto Shurdington Road, and twice in the last month my garden has been under water with flood water running off Leckhampton Hill and new housing concreting over land. Even though my house has suspended floors, flood water has got under the building in recent years and affected the electrics, and has taken over a year to dry out. The water affects the structure of the building and it took many months before internal doors closed properly.

The land in question with its small holdings and open space offers a welcome green space in an ever increasing housing mass encroaching over the green spaces in this area. If 2020 has taught us anything it is the value of green and open spaces for people to escape to, and the ability to get away from main roads and traffic. These smallholdings are part of the special landscape character that contributed to the area being identified as Valued Landscape by the Secretary of State in 2016.

I have lived in my current home for almost forty years, and have watched the traffic pollution in the area increase year on year. My journey to work, nine miles away, takes twice as long now, and even getting out of my road onto Moorend Park Road can take

four to five minutes in rush hour. The additional traffic and air pollution that will be created with the new school and new housing is a frightening prospect and will I believe create severe traffic congestion .

98A Shurdington Road
Cheltenham
GL53 0JH

Comments: 11th January 2021
Letter attached

19 The Lanes
Cheltenham
Gloucestershire
GL53 0PU

Comments: 11th January 2021
Letter attached

8 Larch Rise
Cheltenham
Gloucestershire
GL53 0PY

Comments: 11th January 2021

I respectfully request that thought is given to those of us who chose to live in what was, once, a pocket of peace. The Redrow development has been difficult to cope with due to increased noise, traffic and air pollution, not to mention the dreadful smell we have had to endure for the last 2 summers which comes from their sewage system. Whilst a new school is necessary, I do question the wisdom in the siting of it. The thought of another 350+ houses being squeezed in to this area, which already suffers from high air pollution, is not conducive to the mental health & wellbeing of residents who are both distressed and upset by the scale of destruction to this once, lovely area.

Please bear this in mind when making your decision. Some of us cannot afford to move.
Thank you.

30 Waterford Court
Moorend Park Road
Cheltenham
Gloucestershire

Comments: 14th January 2021

I refer to the planning application for housing development by Miller Homes at Shurdington Road, Leckhampton and would wish to submit the following brief comments/objections.

- Many years ago, when I was a solicitor in Local Government, it was regarded as axiomatic by planners in Gloucestershire that a green lung of undeveloped land should be maintained at all costs to prevent Cheltenham from coalescing with Gloucester. The application site falls within this area. Why have things changed so drastically to the undoubted detriment of local amenity?
- Traffic volumes at present lead to enormous tailbacks along Shurdington road at the traffic lights at junction with Moorend Park road. The proposal will make this state of affairs far worse. Also traffic emissions, already at an unlawful level, will rise considerably to the detriment of the health of the mostly elderly residents of this area.

15 Woodlands Road
Cheltenham
Gloucestershire
GL51 3RS

Comments: 14th January 2021

With regard to the Miller Homes planning application I am neither writing in support or in opposing the proposals for the large site itself.

Having seen the nearby Redrow Brizen Park development that estate looks a good one with its mixture of housing stock etc.

However, there are implications for the surrounding area.

- 1) The A46 Shurdington Road is not really fit for purpose with ever increasing traffic flows and constant dangers for cyclists. With the new South Cheltenham secondary school such matters will become even more of a concern. New roundabouts/traffic lights might be needed especially at the junction with Woodlands Road.
- 2) A new community would rely on existing facilities to be found at Warden Hill re primary schools, shops and the post office.
- 3) From any church's point of view their pastoral role for any new community such as the Miller Homes proposals would add to the workload of church ministers (especially to the Anglican South Cheltenham Team).

4) The loss of footpaths through the present smallholdings will be a detrimental loss to the area as will be the loss of many fine trees.

Comments: 1st October 2021

Further to the e mail below from January and having seen the proposed various road alterations in the documents, I particularly note the sensible proposal for a roundabout at Kidnappers Lane junction, but I have heard from a respected source that the crossing refuge leading from the bus stop almost opposite Woodlands Road is to be removed with the inference that elderly bus users would have to walk back to where the new traffic lights and crossing will be - then having to walk back to Woodlands Road on the other side of the main road. The present refuge if removed might well lead to someone still crossing the road there be hit by moving traffic.

If that is not possible could not that bus stop be resited nearer to those new traffic lights?

8 Merlin Close
Cheltenham
Gloucestershire
GL53 0NF

Comments: 15th January 2021

Just read the notice on planning permission to build 350 new homes in the leckhampton area. I strongly oppose this planning request for the following reasons ...

leckhampton is an area of natural beauty and additional buildings will erode this historic enviable local pride

The leckhampton area in question is subject to flooding and building 350 new homes on a flood plane would be a great mistake

The leckhampton area has had a number of new houses built over recent years and the local roads are very busy especially where the schools are located. The proposed additional 350 houses would not only congest our roads but also be detrimental to the environment

The area in question is home for many rare breeds of birds, animals, plants and wildlife. The proposed housing plan would degrade the local environment and natural home for our protected species

2 Vicarage Close
Shurdington
Cheltenham
GL51 4TH

Comments: 15th January 2021

Letter attached

Brizen Lodge
Farm Lane
Leckhampton
Cheltenham
Gloucestershire
GL53 0NN

Comments: 17th January 2021

I am writing to object to this application on a number of grounds.

The application has used flooding data that does not reflect recent experience or climate change and put houses downstream at risk of flooding as well as the surrounding areas. It also threatens the ecology of the nearby stream.

There are more houses than the area and local amenities can support, particularly with the Redrow development and the 2 additional redrow areas planned.

There is no pavement along Kidnappers Lanes opposite the school as children from this development will expect to attend the school currently being built and this is not accounted for in either the schools planning or this development.

There number of affordable homes is misleading. Of the 40 ish planned, most of these will be flats. The remaining will have help to buy schemes but will not be "affordable" unless the council plans to put a ceiling price of £150K on the 3 bed houses, which is approximately what the average 1st buyer can afford. The homes are being built for profit by both the builder and the council who get a payment for each home built.

There is already a pollution problem in this area and this will exacerbate it.

There is already a traffic problem on the A46 and this development will make it infinitely worse. With a school being built adjacent to the site, this endangers pupils health as we know there is a strong link between pollution and childhood illnesses such as asthma and allergies.

The decision to approve the application doesn't seem to have any independent governance.

This development is contrary to the JCS recommendations.

This area is already highly overdeveloped with the new school and the 3 redrow development it cannot support another.

There are no planned amenities (saying that they will leave some green space when it is currently all green space is not an amenity) such as shops, doctors, dentists, primary schools, cafes or playgrounds.

There will not be enough parking spaces on the development as the majority of houses will house more than one adult with a car as well as many visitors.

There is adequate planned crossing to the school.

Closing Kidnappers Lane entrance to A46 will increase traffic.

As a nearby resident I am disappointed by the number of planning applications coming through in a short time frame, with a short window in which to comment in an international pandemic. I see no concessions to pandemic planning in this application such as wider pavements and spacing between residences and shared spaces, particularly in the flats.

Had I more time to consider this application, I am sure I would have come up with more reasons but as I am working full time and Homeschooling during a lockdown my time is limited. Please vote against this development.

14 Mead Road
Cheltenham
Gloucestershire
GL53 7DT

Comments: 17th January 2021

I am a resident of Leckhampton and would like my following comments on the application to be considered.

1. The transport assessment describes the available foot and cycle routes, but there is no guarantee that they will be used. Similarly, yes public transport is available, but there is no guarantee that people will use it. There is only a chance that people will use it if they have one goal for their journey. If they are carrying out more than one activity within the town, they will always use a car. Also, I know many, many people who refuse to use public transport, just because they do not like it. Unless, and until we have a fully integrated public transport across Gloucestershire and a complete change in culture towards public transport, traffic is going to be a problem each time more housing is built. I lived for many years in Germany and know how far away we are from being fully integrated, with a population that is happy to use public transport for any journey. Re: 4.4.8 - No roads in Leckhampton are 'lightly trafficked'. Was the assessment done during the 2020 lockdown? If so, it will not have been realistic.

The A46 is very heavily trafficked. As an experienced cyclist, I am very surprised by the report's suggestion that it would be safe for cyclists to use. I have cycled for decades around Cheltenham, but I would no longer cycle on the A46, especially in the dark or during rush hour, as I think it is too dangerous.

2. Reference is made to the proximity to the new school being built. I would like to point out that the momentum to build the school was driven by residents of the 'Leckhampton triangle', who are frequently unable to get school places for their children at either Balcarras or Bournside, which is a major problem. We have succeeded, over many years, in getting this project off the ground. Will building multiple homes immediately next to the new school push us to the back of the queue for school places at this school as well, leaving the children in the heart of Leckhampton without a local school?

3. I was interested by the report that refers to how many trees are of value and how many are not. Surely, at a time of extreme global warming, all trees are of value? Furthermore, there is no doubt that the proposed development would have a negative impact on the local landscape, which is highly valued by many.

I hope that my comments are not too late to be considered.

Comments: 27th September 2021

Schooling

The assessment of impact on secondary education includes the places available at Pittville School. This is disingenuous, as Pittville is not local to Leckhampton. Leckhampton High School is being built as a result of years of lobbying by parents of children living in the 'Leckhampton triangle', many of whom have been unable to get places for their children in either of the local schools (Bournside and Balcarras).

What is the assessed impact on the children in the Leckhampton triangle? Will they be guaranteed places at Leckhampton High, Balcarras or Bournside?

I believe the secondary school impact assessment should be carried out excluding Pittville school. This will show the true picture of the impact of this development on schooling for local children.

Attendance by as many children as possible at their local school should, and must be part of the Council's plan to meet sustainability and carbon reduction targets, as children are otherwise ferried across town in cars, or have to undertake inappropriate and long bus journeys when they could have simply walked to a local school.

Traffic

The transport assessment focuses on the impact on cars on the Shurdington Road. There is no assessment of the impact on existing cyclists and pedestrians. As I stated previously, I would no longer cycle on the Shurdington Road because it is so dangerous with the high levels of traffic. This development, with potentially at least 893 additional cars going in and out, will clearly generate more traffic, noise, pollution and congestion on roads that are already under heavy strain. Remember, it will be not only the Shurdington Road that will be affected - what about Church Road?

Of course the report doesn't consider the modelled increase to be significant, but if the numbers are allowed to build up bit by bit through more and more of these kinds of developments, where are we going to end up?

Biodiversity

In a similar way, the Ecological Summary doesn't consider the inevitable reduction in biodiversity to be of too much concern, despite recognising that there will definitely be a reduction. It suggests mitigation measures, but there is no indication that this will be done, or that it will be policed.

We have an Environment Bill currently going through Parliament that will mandate biodiversity targets for new developments. Many councils are already adopting the targets for planning applications. Has CBC adopted the Biodiversity Net Gain of 10% target? If not, shouldn't this development do so anyway? Any net reduction in biodiversity at this time is, to my mind, fundamentally wrong.

These are just my primary concerns arising from the plans. There are more. Overall, in my view, a development of this size would be completely inappropriate in this location, and would be damaging to both the environment and the local community, as well as creating stress and misery through noise, congestion and, potentially, flooding. Please do consider whether something like this is justifiable at a time of climate crisis.

29, Meadowsweet Road
Shurdington
CHELTENHAM
GL53 0AS

Comments: 31st January 2021

The Shurdington Road is a veritable car park during rush hours as it is without more traffic being added to it.

The local primary schools are already oversubscribed so how building another 350 homes will help this I have no idea.

There are flood risks and the basic destruction of local green, natural habitats is reprehensible.

The new secondary school will have a total 900 capacity when full and there's enough demand to see that a reality already without building even more homes.

Comments: 10th September 2021

The revised plans still don't seem to address the traffic congestion issue, the house designs are not aesthetically pleasing and Leckhampton High School will already have enough students to fill to capacity without building another estate, thereby creating more problems of oversubscribed schools, traffic etc... The environmental cost is still too high.

Garden Flat
24 Warden Hill Road
Cheltenham
Gloucestershire
GL51 3AW

Comments: 15th April 2021

I am resending this in the hopes that the decision has not yet been finalised - use vacant other in-town land before, before, before any vital green spaces!

Comments: 25th November 2020

I am strongly objecting to the proposal from Miller Homes as it stands. In brief - there needs to be less housing, more green space must be retained and protected, use should be made of the land for recreation, education, protection of ever diminishing green spaces for local health and well-being and ecological appreciation- all vital.

I would suggest NO hardstanding allowed across the site, no (soon to be redundant) gas boilers, only two storey properties - no higher, provision made for a small opportunity for some retail - to help build community and reduce use of cars.

A fuller letter to follow by email,

129 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0DQ

Comments: 30th November 2020

Clean Air Cheltenham objects to the planning application from Miller Homes for Land at Shurdington Road, planning application reference 20/01788/FUL.

Our submission clearly demonstrates that the Air Quality Assessment (AQA) report provided by RPS to accompany this planning application is so deficient that the air quality impact of the proposed development has not been properly assessed.

Failure to properly assess air quality impact makes any decision on the planning application liable to legal challenge.

The application must therefore be rejected, and Miller Homes instructed to prepare an AQA to a professional standard.

In summary, the grounds for our objection are:

1. The majority of the location of receptor sites are identified incorrectly - this invalidates the dispersion modelling on which the AQA rests
2. Incorrect data been used to check the dispersion modelling of NO₂. These obvious errors again invalidate the model verification on which the AQA rests.
3. The AQA fails to follow the DEFRA guidance in their Local Air Quality Management Technical Guidance (LAQM.TG16) regarding dispersion modelling of emissions.
4. The AQA does not 'sense check' the modelled NO₂ results against actual measurements of NO₂.

A document giving full evidence for these objections has been sent to Michelle Payne for upload.

Comments: 1st December 2020

Letter attached.

21 Merestones Drive
Cheltenham
Gloucestershire
GL50 2SU

Comments: 8th December 2020

I object to this application on the basis of the impact on the dwellings downstream of Hatherley Brook. I have lived in Merestones for 7 years and in that time have twice seen the waterway higher than the footbridges, as well as areas of the bank falling away. This development would put further pressure on the stream and increase the flood risk to the development houses and those downstream such as the Merestones estate.

I also feel the traffic impact of the new school being built on neighbouring land should be fully assessed before another planning application of significant size should be allowed.

It has also been reported that this area of Cheltenham already has higher than average traffic emissions in the air, and adding further housing (and therefore traffic) will only exacerbate this problem.

3 The Range
Gloucester
GL2 8NL

Comments: 8th December 2020

Gloucestershire Community Rail Partnership is a non-statutory community organisation. We have made a full representation which has been emailed to the case officer today

26 Moorend Park Road
Cheltenham
Gloucestershire
GL53 0JY

Comments: 9th January 2021

I object to this development for following reasons:

- increased air pollution in an area which is already affected badly by this.
- The new school is promoting children walking to school but the new development will mean increased congestion and our children therefore breathing in additional car fumes.
- Shurdington road traffic is already terrible at rush hour and this will become worse

- I live on Moorend Park Road and there will be a knock on affect of increased traffic on our road.
- the proposed area is so valued by our community. It provides children with the priceless experience of walking through small holdings seeing chickens, sheep, picking blackberries etc. This will be lost.
- Loss of habitat of thousands of native animals and plants
- Every year the fields flood. If the houses in the development are protected from flooding then there will be an increased risk of flooding for houses near by because we will have lost our flood plains.
- The development is against previous recommendations by JAC in terms of number of recommended houses of the area.
- the community have had to defend our open space on many many occasions. I am concerned that the developers are taking advantage of our fatigue in responding to all these applications. Please leave us and our open space alone.

Hazelmere
57 Moorend Park Road
Cheltenham
Gloucestershire
GL53 0LG

Comments: 14th January 2021

We feel strongly that this development would have a significant detrimental impact on Cheltenham Borough Council's commitment to go Carbon neutral by 2030. The current public access across this green space is enjoyed by many local walkers and people wishing to exercise. In addition, removing the tree line and open fields would have a major negative impact on the houses around Merlin Way and the wider Leckhampton community.

2 Mimosa Avenue
Up Hatherley
Cheltenham
Gloucestershire
GL51 3WB

Comments: 15th January 2021

We object to these mainly on the following reasons.

1. Traffic congestion and pollution - the A46 is already severely congested and will become more so once the new school opens and other residential developments are completed. There is little scope to improve traffic flow and management so the inevitable consequence is unacceptable congestion with higher levels of pollution an unwelcome result of this. My son suffers from acute asthma with will be made worse by the resultant impact on air quality of this development.

2. Damage to the environment and loss of countryside for recreation purposes.
3. Potential flood risks to existing properties.

We ask that planning permission for these 350 homes be denied.

Little Bradwell
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NX

Comments: 9th January 2021

We object on the grounds that it will have a negative impact on the character of Leckhampton and the historic Kidnappers Lane.

Also that it will negatively impact the well being of the local public.

This site, the footpaths running through it and Kidnappers Lane itself are enjoyed by hundreds of people - even more evident during lock down, for exercise, walking dogs, family outings etc...

Although the fields are not open to the public, it is the open setting that attracts people and gives value to the area. The wide views of Leckhampton Hill AONB are key vistas from the paths and from Shurdington Road that define the character of the area. This will be lost if the paths are reproved through a new development.

The proposed site will increase the built sprawl along the Shurdington Road and will join together Warden Hill, Leckhampton and Shurdington which loose their own distinctive characters.

There will also be a negative impact on the views from The Cotswold Hills AONB.

The impact on highways and infrastructure, drainage, air quality, school places, ecology and biodiversity, carbon emissions, affordable housing have been assessed by others and so are not included here, but are still areas of concern.

We appreciate that there is a need for additional, affordable housing, but following this unprecedented period the shape of our town will change. Surely there is an opportunity to find an alternative site, without building on open green fields?

Moorend Villa
7 Moorend Road
Cheltenham
Gloucestershire
GL53 0EP

Comments: 9th January 2021

Environment/wildlife

The area has numerous natural springs and the area is usually very wet, where will all this water go when the area is developed?

This land is used by a variety of wildlife, including deer, multiple bat species, and many bird species. The proposed development will remove this valuable habitat, and likely degrade the value of the adjacent Local Green Space allocation. Local nature in the area is already under pressure and has been displaced by new developments in recent years.

Traffic/pollution.safety

Traffic congestion is already a significant concern in the area: this will be worsened by the new secondary school and also as the changes to Leckhampton Primary school.

The Shurdington Road is one of the main routes into Cheltenham, over the past 5 years an increase has already been seen in the volume of traffic with the Redrow housing development on Farm Lane, the increase in pupil numbers at Leckhampton Primary school (which will further increase as the three-form entry extends to all year groups).

Kidnappers Lane will become a "rat-run". This lane has no footpaths and is inadequate for two-way traffic and will become very dangerous for all of us, including the school children and many walkers who use it.

The Shurdington Road is already extremely busy with long queues in both directions at peak times and school times. This development will bring with it huge amounts of extra traffic. The surrounding roads will become 'cut through' routes with traffic looking to avoid the queues. Extra pollutants will be suffered by local people, particularly as a large area of trees will have to be removed.

Footpaths and cycle routes:

The existing footpaths are already under pressure.

Existing footpaths are well used and need to be protected for all who currently use it

The A46 is barely wide enough for two people/a pram to walk along what is a very busy road. Farm Lane/Kidnappers Lane also have very narrow footpaths. These footpaths and others in the local area will come under pressure from the new Redrow development and the new Leckhampton High School. The additional burden from this proposed new development needs to be considered.

The traffic in the area is classed as "Severe", Whilst the on-site proposals are good, they don't connect to any footpaths or cycles paths which meet the standards required.

The current access points to Burrows playing field are predominantly from Moorend Grove and Church Road. These are supported by footpaths/road access. However, the current plans for the housing development appear to offer no improvement to other access points.

Wellbeing

With the secondary school being built, Leckhampton Primary School expanding and around 350 Redrow houses being built It is surprising that these have not been linked to the Burrows via footpath/cycle paths. People, especially children need to be able to move between these sites easily and safely.

Better footpath/cycle path linkage from all sides of the Burrows are needed. Better paths linking in via Kidnappers Lane and Merlin Way are needed. They could easily link directly onto the circular path at the Burrows.

The allocation of allotments seems way too small for the number of proposed houses

Any homes that are built need to be affordable for young/new families and first time buyers. This looks to be a development for well off people who want to get into the new school. Rich people will buy second homes to facilitate getting into the new school. It will become a magnet for second homes and buy to let and yet another executive homes site.

Additional point

Apparently, many of the "supporting" photographs showing the surrounding areas are out of date in that they do not adequately show the development that has taken place over the last couple of years. The lack of accuracy in these photographs implies a location and situation that no longer exists and therefore they are misleading and have no supporting role to play.

31 Mead Road
Cheltenham
Gloucestershire
GL53 7DY

Comments: 19th January 2021

My family have occupied the Glebe Land , so-called the Pig Field and surrounding fields, for generations (Great Grandfather, Grandfather and myself). The Northern Fields have landscape merit and the importance of the so-called Pig Field view of Leckhampton Hill across the Northern Fields from Shurdington (A46) Road is extremely valued by local residents and a joy for those visiting the town. Further consideration should be given to what can be done to protect this view in the event of any proposed development going ahead i.e. setting the proposed development further back from the road (creating a green or orchard) or designing the development such that the view can be maintained and uninterrupted (a gap through which to maintain the view). 2020 and the start of 2021 has shown us the importance protecting such landscape of merit and treasured views in terms of our general mental health and well being.

I recognise there has to be a balance between providing much needed new housing and protecting our valued landscape and views. Key areas of consideration for this particular development are the impact on the valued landscape and views (as mentioned), traffic congestion, flood risk, ecology, air pollution and supporting infrastructure i.e., nurseries, schools, doctors.

Questions still appear to remain on what the true impact of the inevitable increased traffic will be in this area. The A46 is a single carriage road and carries significant traffic in and out of Cheltenham at key times. Alternative routes are also congested with noteworthy concerns of congestion and safety on Church Road Leckhampton in particular, owing to the narrow nature of the road (due to parked cars), proximity to Leckhampton School and impact of the recent Redrow Development. It appears no one is clear what impact this development alongside the approved new Secondary school will have in truth (both during construction and eventual occupancy). We also need to ensure the public paths are of sufficient width (currently the public path opposite the so call pig field is only wide enough for single file walking) and consideration is given to further protecting cyclists along the A46 stretch of road and well as further considering bus routes (noting there is currently no bus lane).

Other comments submitted have noted concerns over flooding and potential issues with sewage. There appears to have been recent experience within/near by another development close to the proposed site whereby the issue of drainage has led to unpleasant smells and impacts of increased issues. Again it appears questions still remain on whether the size and scale of the proposed site will lead to issues of flooding and whether the existing drain/sewage infrastructure can take a development on this scale without any future issues.

In addition, whilst acknowledging the new secondary school which is being constructed, it is not clear what the plans are in terms of nurseries, primary schools, GPs and dentists etc and the overall future sustainability of the local area alongside other proposed developments.

The proposed development does include protection of certain green spaces. This is very welcome. As well as comments from others on what more can be done to protect the landscape of merit I would like to put forward a suggestion that an area is reserved in recognition of the heritage of the overall site (pig farm and small holdings). This area (potential orchards with rare breeds) would allow local residents (inc. those moving into any proposed development) to continue to gain a unique experience with their family and friends and learn more about the heritage of the area (attached is some pictures to bring this to life of my pigs and my Great Grandfather's pigs on the so called pig fields). The proposed site is often referred to as largely disused. Whilst not an inaccurate term, it is worth nothing this is largely by design (undertakings of the proposed development, short term tenancies). With more certainty the land would look very different to how it looks today.

I recognise these are not easy decisions, but further consideration of the above points would be welcomed, so we can ensure the final proposals, which will have a lasting impact, so strike the right balance.

(Photo attached)

Friends Of Bournside
C/o 80 Bournside Road
Cheltenham
GL51 3AH

Comments: 19th January 2021

Letter attached

28 Lambert Gardens
Cheltenham
GL51 4SW

Comments: 19th January 2021

I strongly object to this planning application. We do not need another 350 houses in this area, we already have plenty of houses being built, Brockworth, Redrow and the Cyber Park. The Shurdington Rd badly floods. We should be preserving some green fields for our health and wellbeing, not destroying them. Where will all the deer, badgers, foxes, etc go, we have destroyed enough of their habitat, we should be planting more trees, not keep building houses. We are all in danger of poor air quality, and poor health, due to the sheer number of cars that will be using the already congested Shurdington Rd. Have all these people that are coming here have local jobs, or are they going to travel to the big cities. PLEASE DO NOT LET THIS PLANNING APPLICATION GO AHEAD.

18 Waterford Court
Moorend Park Road
Cheltenham
Gloucestershire

Comments: 19th January 2021

This is an objection to a planning application to build by Miller of 350 houses on former Agricultural Land.

My objections are as follows.:

This proposed development is going to generate a substantial increase in the number of cars , potentially an extra 700. Shurdington Rd, can not be widened as most of this road has already built residential dwellings on each side. The amount of traffic is already forecast to increase substantially when the large school nearby is built. Shurdington Rd is already at capacity at peak times of each week day. Never mind on race days.

I own a flat at nearby Waterford Court and can testify as to the volume of traffic already using this road. It will be even more difficult to get out of Moor End Park Rd if/when extra development takes place.

The Leckhampton PC, have already checked the pollution levels on Shurdington Rd which are very high now, above WHO levels. They will be even worse. In summer when

I have windows open in my flat, you can smell the road, the exhaust fumes can be smelt as well. I usually end up being forced to close my windows which is also unhealthy.

There is also a risk of flooding in this area.

At present the land has small holdings on it which makes for bio diversity.

Please reconsider whether planning permission is really viable for this area.

Please consider the effect this wanton development will have on all the people who are living along this road, which should also include the risks to their health from breathing in all the poisonous gasses emitted by the stopping and starting of cars, busses and heavy lorries at the nearby traffic lights at its junction with Moor End Park Rd.

Orchard View
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NL

Comments: 22nd September 2021

We strongly oppose this proposal on a number of grounds.

Traffic - we are very concerned by the increase in traffic this development will cause, and the resulting increase in pollution (both air and noise). The traffic along the Shurdington Road during peak times is already at a standstill from the Moorend Park Road Junction back to the roundabout at Upper Hatherley Way.

Risk of flooding - since the Redrow development we have noted a significant increase in surface water in the surrounding areas during heavy rainfall, including parts of Kidnappers Lane which at times have become barely passable due to the water on the road.

Facilities - the infrastructure / facilities in the area are already v stretched and this new estate is not providing any further health or educational provisions.

Environments cost - loss of local green space and wildlife.

St Brizen
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NL

Comments: 30th November 2020

The site layout plan suggests that the Shurdington Road end of Kidnappers Lane would become an even worse traffic hazard than it is now.

I would like to suggest that a road from the new roundabout on Shurdington Road should run directly through the new estate, ending with a mini roundabout in Kidnappers lane near the new school. This would make traffic flow far fairer for the whole community.

The current plan shows a road that would be eminently suitable for this purpose. It is shown as blocked off at the Kidnappers Lane end, presumably to keep traffic flow at a minimum to increase the saleability of the houses.

However the planners need to consider the knock-on effect of that layout as it would result in a massive increase in traffic entering Kidnappers Lane from the roundabout, thus seriously affect the lives of the people who already live there.

Given the opportunity to realistically address the school access problem at this starting point rather than wait until there is a massive traffic problem in the future, I beg the planners to bite the bullet and insist on a through road on this new estate. A mini roundabout is needed near the school for safety, so this would tie in perfectly.

Also Planners have a serious duty to protect some element of the environment for the people who already live here, i.e. taking priority over developer's profits.

On the current plan 350 people living in the 350 dwellings will have no direct vehicular access to the new school except via Kidnappers lane.

It is nonsense to expect/believe that parents will not drive their children to school, especially in the depths of winter. People in Warden Hill and Hatherley, and the estates at the top of farm Lane will also drop off their children by car. Parents in further parts of Leckhampton will not let their children walk down lonely Kidnappers Lane, and will drop off their children on their way to work. Kidnappers Lane is already a busy cut through from Leckhampton and Charlton Kings to the M5, Gloucester and Stroud, so please do not add to the traffic problems that already exist.

Comments: 18th January 2021

New homes are far more "much needed" in other parts of Cheltenham where those needing them won't have to pay a Leckhampton premium, which is exactly what Miller Homes are after.

House buyers are moving to Gloucester, not because there are no houses to buy in Cheltenham, but because they are too expensive. Miller homes can't pretend to be helping that problem by building in Leckhampton! Outside developers are led by profit, and the council should not think otherwise. 350 houses on that small area is absurd. For environmental reasons 200 houses is equally absurd.

Cheltenham is slowly losing its handsome appearance as the green belt is more and more consumed by estates built by outside developers. These days it's hard to distinguish one town from another as identical estates pop up in every space. Does Cheltenham really need to ruin its wonderful green surroundings by copying this ugly pattern? Miller Homes say there is a specific need in Leckhampton - really? Is there a need in Battledown, or Charlton Park Gate, or The Park? The answer would be yes if they could get land in those areas (imagine the premium they could achieve)!

In the 60s, when Warden Hill and Hatherley were being eaten up by Wimpey etc. Cheltenham Planners made a promise in writing to house buyers, and to the press, that the 'designated green belt' would never be built on. House buyers were actually told by their solicitors that the promise was legally binding. How did the council manage to deceive the public so spectacularly?

Wildlife that has occupied this Shurdington Road space for hundreds of years will be decimated. There is nowhere for them to go and they will simply die. Until the unwelcome school in Kidnappers Lane started cutting down ancient hedgerows and bringing in huge machinery this small area housed a large herd of muntjac deer, a huge colony of badgers, plus foxes, owls, greater and lesser woodpeckers, dormice, newts, rabbits, large deer, etc.. What will become of these animals, most especially the badgers? What has been secretly going on to get rid of wildlife in the area that has been gated off with 'keep out' signs? Where have the muntjac vanished to? Have badger setts been secretly damaged?

I ask the planners to consider keeping Cheltenham as an attractive place to visit (not just the town centre), and to directly consider the effect on the local environment in the location where Miller Homes want to build. That includes the people who live here. We are already alarmed by the school project. The prospect of being in the centre of a large housing estate is even worse. I am being driven out of my home, my neighbours have already gone. Can we trust the council to care?

Smalley
Kidnappers Lane
Cheltenham
Gloucestershire
GL53 0NL

Comments: 13th January 2021

My family and I will be directly and negatively impacted by this development. We strongly oppose the proposed development in its current form for a number of reasons outlined below.

Traffic

This proposed development will lead to increased pressure on the road network, an increase in noise and an increase in air pollution. There is already congestion along the local roads and the A46. This pressure will only increase once the new Leckhampton High School is completed. The submitted plans need to improve road access to the Shurdington Road and to the new Leckhampton High School.

Services

The development plans must include local services such as a new health centre (GP, dentist, etc), children's playground and local shops. New housing development in this area will attract young families and if these local services are not provided, the people moving to the new development will overwhelm the existing services which are already overstretched.

Visual impact

The proposed development of high density properties is not in keeping with the existing developments in the area.

The buildings in this area are mainly bungalows and 2 story houses with access to nature. Furthermore, the proposed development uses red brick instead of the yellow stone work which is typical for this area and Cotswolds in general.

For the reasons stated above, I strongly object to the proposed development. Thank you for your consideration.

Comments: 29th November 2020

As one of the properties that sits directly opposite the proposed development (Kidnappers Lane), my family and I will be directly and negatively impacted by this development. We strongly oppose the proposed development in its current form for a number of reasons outlined below.

Traffic

This proposed development will lead to increased pressure on the road network, an increase in noise and an increase in air pollution. There is already congestion along the local roads and the A46. This pressure will increase once the new Leckhampton High School has been completed. It doesn't make any sense to add to the burden on the local transport network in this location.

Foot paths

The existing footpaths are already under pressure.

The A46 is barely wide enough for two people/a pram to walk along what is a very busy road. Farm Lane/Kidnappers Lane also have very narrow foot paths. These foot paths and others in the local area will come under pressure from the new Redrow development and the new Leckhampton High School. The additional burden from this proposed new development does not seem to have been considered at all.

Ecology

Local nature in the area is already under pressure and has been displaced by new developments in recent years. The loss of open green space to the development of the new school was a big loss for nature in the area and to remove yet more green space is very irresponsible.

Adding yet more property development to the area in this particular location will put an extra burden on the surrounding land and increase the risk of flooding.

Services

It is very strange that no provision has been made for local services on a development of this scale. It's unacceptable to place yet more of a burden on local services - why is there no GP, Dentist, small shop etc proposed as part of such a development. This doesn't seem to have been thought through at all.

Visual impact

The proposed development of high density properties is not in keeping with the existing developments in the area.

The buildings in this area are mainly bungalows and 2 story houses. The proposed 3 story homes are out of keeping with the character of the area and will spoil the overall character of the landscape.

We are in/close to an AONB and a development of this scale will significantly diminish the character of the area and the proposed designs are not in keeping with the Cheltenham Local Plan.

For the reasons stated above, I strongly object to the proposed development. Thank you for your consideration.

26 Merlin Way
Cheltenham
Gloucestershire
GL53 0LU

Comments: 14th January 2021

I am objecting due to increased traffic on the Shurdington road - which is already congested during the day. Increased traffic trying to get out of the estate will put increased pressure on this road network. I also object that this increased traffic will cause additional pollution which will impact residents and children walking to school. I am worried about wildlife currently living in this area will have to relocate. There is a family of deer that live there - this family will be displaced. The area and path around where the proposed building will take place have been used extensively by families through lockdown as a means of getting outside and mixing with nature on our doorstep. Families can currently make use of the paths and safely have somewhere to exercise.

16 Merlin Way
Cheltenham
Gloucestershire
GL53 0LT

Comments: 14th January 2021

I wish to object on flooding risks and traffic congestion.

Flooding - The area has always been susceptible to flooding, Hatherley Brook does fill up when there has been heavy rainfall, with water flow off Leckhampton Hill. During the severe floods of July 2007 Hatherley Brook overflowed and encroached the gardens of 15 and 17 Merlin Way, the properties whose gardens back onto the Brook. The proposed development will mean that there is no natural run off to hold back any excess water and so properties in Merlin Way will be susceptible to flooding and with climate change this could be on a more regular basis.

No mitigation has been made for extra traffic congestion on both the A46 Shurdington Road and also the A46 junction with Moorend Park Road. Congestion has increased greatly in recent years. With the new Secondary school and also with an existing development on the A46 opposite Silverthorne Close this will worsen for residents in the affected areas.

The Sleepers
Merlin Way
Cheltenham
Gloucestershire
GL53 0LS

Comments: 11th January 2021
Email attached.

17 Highwood Avenue
Cheltenham
Gloucestershire
GL53 0JJ

Comments: 26th November 2020

I strongly object to this proposal on the following grounds:

Traffic

The stretch of the Shurdington Road between the Up Hatherley Way and Moorend Park Road junctions is already extremely busy at peak times. The construction of such a large number of houses, coupled with traffic to the proposed new secondary school, will increase both congestion and air pollution along this road. Comments by the Secretary of State for Communities and Local Government on an earlier development proposal in the same location cite "severe residual cumulative transport impacts" as a major point of concern.

Damage to the character of the area and loss of local amenity

The land for development forms part of a rural "wedge" between Leckhampton and the edge of Cheltenham. The network of footpaths within it is well-used by local residents, an amenity that will be much diminished as a result of the development. The recently adopted Cheltenham Plan requires that any development on this site be of a layout and form that respects both its "rural characteristics" and the "visual sensitivity and landscape character of the site as part of the setting for the AONB". The proposed high-density urban development respects neither.

Flood risk

The eastern branch of Hatherley Brook has a history of flooding and poses a significant flood risk to properties adjacent to and downstream from the new development. The flood risk assessment for the site acknowledges that surface water will be drained into this watercourse. Nearby Lotts Meadow is currently very waterlogged, suggesting that surface water run-off from the new development could be high, increasing pressure on the brook.

Ecological impact

In the short time that I have lived nearby, I have observed that this land is used by a variety of wildlife, including deer, multiple bat species, and many bird species. The

proposed development will remove this valuable habitat, and likely degrade the value of the adjacent Local Green Space allocation.

Existence of alternative viable sites

The Cheltenham Plan indicates that large areas of land to the North and West of the town have already been allocated for development as part of the Joint Core Strategy. It also reveals that there is a surplus of land for employment development. This Miller Homes development will provide only a small fraction of the total new dwellings envisaged by the plan, which could apparently be made up elsewhere. With that in mind, the costs outlined above seem even harder to justify.

For the above reasons I ask that the council reject this planning application.

Comments: 14th January 2021

As an addendum to my comments on the above application dated 26 November 2020, I attach photographs showing recent flooding by Moorend Stream (Hatherley Brook Eastern Branch), adjacent to and within the proposed area for development, as well as overloading of the A46 culvert that carries the stream. (photos available to view in Documents tab)

This is at least the second occasion on which such flooding occurred in 2020 (see comments from 98 Shurdington Road, dated 18 November 2020), so it is definitely not an extreme or unusual event. I bring it to your attention to highlight the present risk of flooding in this area: if development is to proceed, careful consideration must be given to this risk to both new and existing homes.

11 Highwood Avenue
Cheltenham
Gloucestershire
GL53 0JJ

Comments: 14th January 2021

Detailed arguments are already covered by other residents' and the parish council's submissions but I object to the planning application because of concerns about:

- unacceptable damage to the valued landscape
- severe traffic congestion and increased air pollution (I am unconvinced by the reports submitted with the application and believe independent work is required)
- the potential for increased flooding risk
- the huge number of houses crammed into the space with deficient changes to road access to Shurdington Road

This green space in Leckhampton is slowly being eroded and it will be a huge loss to the community if the borough council allows this to continue.

The borough council also needs to look at all of the recent and proposed applications for the area in the round - the school, Miller, Kendrick, Redrow. The significant issues with the school were not addressed and if further applications are also not considered

appropriately, each will adversely effect the character of the area, wildlife, traffic and air pollution in an unmanaged and incremental way.

Work is also required to join up these applications and other work to ensure that any new walking or cycling paths actually form a useful network.

This application should be deferred until much further work is done to fully understand the impact of this and the neighbouring developments.

9 Highwood Avenue
Cheltenham
Gloucestershire
GL53 0JJ

Comments: 15th January 2021

I wish to register my objection to the Miller planning application for 350 homes on Shurdington Road.

There has already been considerable development in this area and more is planned with the Redrow development and plans for the new school. The area simply cannot take any more development.

The Shurdington Road is already far too busy, with traffic at a standstill in the morning and evening rush hour and that is without the traffic that already approved development including the new school will bring. To add another development of 350 houses (with many of them likely to own more than one car) would have a disastrous effect on the traffic situation not to mention pollution as cars idle while they are in a queue.

In my view there would also be unacceptable damage to the valued landscape of the Leckhampton Fields. This area is used by many local people for walks and general recreation. It is not enough to say that access to footpaths/cycle paths will be provided. If the views and tranquility of the area is spoiled by buildings and traffic it will not continue to have the value it does today. We are all now increasingly aware of climate change and global warming and building on our green spaces contributes hugely to that. We have a global responsibility to look after and cherish our environment. The small holdings on some of this land add enormously to the value of the area. I moved to this area because it was on the edge of the town with easy access to, and the feel of being in, the country side. The small holdings are very much part of that.

I feel strongly that this development will damage this area irrevocably and that as stated above there is already a huge amount of development going on here. Another 350 homes is a step too far.

I urge you to reject this application.

96 Shurdington Road
Cheltenham
Gloucestershire
GL53 0JH

Comments: 11th January 2021

We wish to make a "STRONG OBJECTION" to the above planning application, on the following grounds:

TRAFFIC

I feel that traffic on the Shurdington Road is already at "maximum levels" at rush hour times, with the resulting problems of major delays and pollution etc - nearby residents have similar concerns.

Current Traffic problems will obviously be made worse by the large number of new houses being built/planned on the South side of Cheltenham plus the new Senior School to be built soon.

PROPOSED NEW TOUCAN CROSSING

Close to the access to 94 to 104 Shurdington Road (7 dwellings in all) would make it very dangerous for people turning in and out the drive and people using the crossing.

Only a few years ago there were considerable local concerns about a new Bus Stop/Lay by being proposed at this same location (with worries about poor air condition, noise, privacy issues and security risks). We were very relieved when this matter was NOT APPROVED. We believe the same issues and planning concerns apply today.

Merestones Estate Residents, whose homes would back onto this new Toucan Crossing, have also expressed their Formal Objections in this regard.

By virtue of the new Senior School and the nearby Miller Homes and Bovis Homes planning applications, I understand there will be 4 separate crossings along this part of Shurdington Road - with 2 of them being in our local area and close to each other. We feel that the one crossing closest to our homes and directly outside 104 Shurdington Road is NOT NECESSARY and should be Withdrawn - to ensure greater safety and remove pollution aspects as mentioned above.

350 NEW HOUSES

Clearly destroying our nearby Countryside and Wildlife. Also 350 is far too many in total based on recent Borough Council public policy.

FLOODING

Already a major concern in the locality - likely to be made worse by the nearby extra new 350 houses. Flood Policies and local plans should be strictly adhered to.

We believe this information is very relevant to the Application and wish to make a FORMAL OBJECTION.

98 Shurdington Road
Cheltenham
Gloucestershire
GL53 0JH

Comments: 22nd November 2020

Letter attached

The traffic in the area is classed as "Severe" and no effective plan has been presented to reduce that state. Whilst the on-site proposals are good, they don't connect to any footpaths or cycle paths which meet the any standards required. This whole area of Cheltenham needs to be upgraded but I was unable to find a coherent plan with a budget from Gloucestershire Council, Tewkesbury or Cheltenham.

Comments: 24th January 2021

Letter available to view in Documents tab.

Comments: 19th November 2020

you will note the because of the COVID restrictions any public consultation is currently severely limited. Therefore, I believe it to not be in the public interest to close public opinions less than 30 days after the Government lifts the rules for the public. Which may or may not be 2 Dec.

In relation to Flood Risk:

My concern expressed at the 19/00334/OUT tribunal is that the combination of these proposals severely increases the flood risk to a brook which floods once or twice a year and is currently subject to the collapse of footpaths downstream of the A46.

Our house is awfully close to the Zone 3 at the culvert. All of the following developments develop nearly all of the land East of the A46, land which has low permeability.

If these are to be individual schemes who will maintain them as the brook East of the Road appears not to be maintained?

The Flooding implication of all of the following must be considered together.

- 20/01788/FUL Miller Homes 350 Houses Between A46 and kidnappers lane
- 19/00334/OUT 27 Homes Kidnappers Lane
- 19/01690/DEEM3 Lechhampton School
- 20/00332/FUL Burrows Playing Field Footpaths
- 19/02303/OUT 12 Homes Bovis Homes Ltd
- Burrows Playing field astro turf pitches are being added.

Council policy clearly says that if the risk to properties downstream are at risk they must be refused. We lay downstream! as does Council Properties!

Comments: 20th November 2020

Letter attached.

100 Shurdington Road
Cheltenham
Gloucestershire
GL53 0JH

Comments: 11th January 2021

Letter attached.

102 Shurdington Road
Cheltenham
Gloucestershire
GL53 0JH

Comments: 11th January 2021

Letter attached.

104 Shurdington Road
Cheltenham
Gloucestershire
GL53 0JH

Comments: 7th January 2021

Letter attached

.

Comments: 1st May 2021

1. These comments are sent in addition to my earlier written comments to you, regarding the 2 above planning applications.

Our earlier comments were "Strong Objections", as were the comments of my neighbours.

2. The reason for this email today is in view of what should be classed as "major unforeseen developments" during Monday, Tuesday and today of this week (26, 27 and 28 April 2021) AND which have particular relevance to both the above planning applications, which have yet to be formally determined etc.

3. On 26.4.21 major works involving a JCB digger started on the entrance to the Kendrick site, which involved removing hedging/grass verge alongside the main A46 (Shurdington Road) - subsequent kerbing and tarmac work has been done.

It was also necessary to have temporary traffic lights placed at this location on the Shurdington Road.

4. As a nearby resident I was alerted by the noise as well as the very lengthy queues of traffic in both directions, arising from these traffic lights in situ.

5. It is now known that Gloucestershire County Council Highways had issued a Section 184 Licence to Kendrick Homes to install a temporary access, which we understand was NOT to the knowledge of CBC Planning Dept, nor the Leckhampton with Warden Hill Parish Council, nor local residents.

6. I can say that traffic queues have been considerable throughout the period this work has been taking place - going right up to Moorend Park Road Traffic lights junction (approx 400 metres) and beyond and likewise in the direction of Shurdington.

Pollution in its widest sense - "poor air quality, extra noise and breach of our privacy" have been very much a worry for us.

7. The traffic queues were so severe that I decided to take a series of evidential photos "for the decision makers" to best appreciate the events at some later date, when deciding on these 2 planning applications.

8. I forward for your attention 2 photos taken at approx 2.25 pm on this Monday afternoon - NOT RUSH HOUR.

Photo no 142522 (available to view in Documents tab) - shows the lengthy traffic queues back in the direction of Shurdington and the need for a flashing Ambulance to take an emergency driving procedure!

Photo no 142454 (available to view in Documents tab) - shows the lengthy traffic queues of about 400 metres right back up to the Moorend Park Road traffic lights and occasionally it was past the lights in the direction of Bath Road. In the traffic queue is a stationary Bus and another Ambulance.

FINAL COMMENTS

- I make the point that such queues will likely be a very common factor at this location, when at least 360 additional homes, especially with Kendrick Homes and Miller Homes having planned nearby accesses onto A46.

- The situation will also obviously be made worse with the extra traffic associated with the new senior school at Leckhampton (still to be built). There are of course considerable additional houses being built/planned in Leckhampton and near Brockworth.

- I can confirm that similar road works/ temporary traffic lights have taken place a number of times over recent years on this area of Shurdington Road, with resultant major traffic queues and pollution being significant.

- I have over these recent years made these identical written points and sending similar supporting photos showing lengthy

traffic queues associated with road works/Traffic lights - to Cheltenham Borough Council Planning Officers when considering local Planning Applications, Local Plan and JCS.

It is felt that the events of the last few days (as described above) are SO SIGNIFICANT , such that formal notice should be taken of them, when assessing the 2 above planning applications - even though the closing date for public comment is getting closer!

Comments: 11th October 2021

These comments are submitted relating to the above Miller Homes Revised Application.

This email is written as residents of Shurdington Road and close to the Proposed 350 Dwellings - we have many years experience of living in this location and have obvious knowledge of the increased traffic and associated Pollution that has resulted over the years.

This is our 3rd document submitted as an "Objection" to the Miller Homes Application for 350 homes on the Shurdington Road - in addition to other nearby proposed developments.

The 2 earlier documents (dated 6.1.21 and 28.4.21) and this latest one, should be read in full to have a detailed appreciation of our concerns - not only for ourselves, but also from our neighbours and those residents on the other side of the Shurdington Road (Park Ward).

One of our concerns in the initial application was the proposed siting of a Toucan Crossing right outside the front of our bungalow home, thereby causing increased Pollution, Breach of Privacy etc.

It is of major concern that this proposed Crossing still remains in the REVISED Application/Drawing, BUT IN ADDITION there is NOW a Proposed "Maintenance Bay" - close to the crossing, which appears to be situated in the "Middle of our Hedge".

As we have previously commented - to have 4 Crossings on this part of Shurdington Road seems excessive - this being on top of the nearby Moorend Park Road Traffic lights/crossing.

Interesting to note - throughout this application process Miller Homes have actually written that, it is their intention to also use the other crossing nearby (in the Kendrick application), as well as the one in their own Application (right outside my home).

We previously commented that Additional Pollution - in the precise location outside our home - was a "Local Community Concern" of the 2013/15 Application/Appeal by Bovis/Miller - and these concerns were clearly recognised by the Developers, GCC Highways and CBC Planning Officers - leading to the proposed bus stop/lay by being Formally Withdrawn by ALL parties.

The Question we keep asking is - If Additional Pollution was NOT allowed in 2015, why is it still being considered as acceptable in 2021 - in the same precise location - also when such matters are getting worse?

This email is sent to the best of our knowledge and understanding and we ask that you give this email your full consideration.

59 Merestones Drive
Cheltenham
Gloucestershire
GL50 2SU

Comments: 26th November 2020

I object to the new development as the Shurdington Road is already too busy, too noisy and creates high levels of pollution for those living on and backing on to this busy road.

The new entrance onto the new development from the North side of the site will just add to the congestion and noise, surely it would be safer to ease congestion and for all vehicles to be entering and exiting the new development from the new roundabout on the south side of the development which will help the flow.

I also object to the North Eastern Crossing which will be sited at the rear of mine and my neighbour's house, and almost under their bedroom window. It seems no consideration has been given to current residents and their proximity to the crossing. I run an Airbnb from my house and am concerned about the 'bleeping' noise from the crossing and would ask that it be moved South towards the bus stop/Warden Hill shops which is where most pedestrians will be coming and going, this would also be better access for primary schools as I'm sure Leckhampton Primary will not have capacity to cater for all.

Lastly, I object to three story dwellings in this area, all other properties around this area are bungalows and 2 story houses and three story dwellings will spoil the landscape.

10 Hobby Close
Cheltenham
Gloucestershire
GL53 0LP

Comments: 6th January 2021

I object on the grounds of visual and environmental impact on a semi-rural area ill suited to large scale development. I agree with the view that extra traffic created by the new High School will require at least three years to assess and therefore this application should be considered in the light of actual traffic increase over a period of time.

Comments: 6th January 2021

To be clear, I object to this application on the grounds of likely adverse visual impact and environmental disturbance. Increased traffic has not been sufficiently highlighted and cannot possibly be assessed accurately until the new High School has been up and running for long enough to gauge its impact on traffic numbers.

44 Shurdington Road
Cheltenham
Gloucestershire
GL53 0JE

Comments: 12th January 2021

The traffic on Shurdington Road is extremely busy and we deal with this on a daily basis. Along with the amount of traffic we also have to contend with constant breaking of speed limit. This will only impact these issues negatively.

7 Abbots Close
Hatherley
Cheltenham
Gloucestershire
GL51 3DX

Comments: 15th January 2021

I am a resident of Abbots Close, a hundred yards or so from the proposed new development.

There is already too much traffic on the Shurdington Road heading into Cheltenham. Forget what it looks like now, under Covid restrictions, another 350 houses with one or two cars each, the majority of which will feed out onto the Shurdington Road in either direction of a morning, will clog this road up further. Currently traffic can back up from the Moorend Park Road traffic lights for nearly a mile towards Shurdington itself, and this will make things worse. A single carriageway in each direction will need some kind of traffic lights or roundabout to feed in these new residents, which will exacerbate the situation. If we need new homes, why not shift development down towards Hatherley and the Morrison's shop? There is also more infrastructure in terms of shop and community centre down there.

11 Canterbury Walk
Cheltenham
Gloucestershire
GL51 3HQ

Comments: 15th January 2021

We write to object the planning application by Miller Homes to build 350 homes on land at Shurdington Road, Leckhampton, Cheltenham.

We are residents of Canterbury Walk, Warden Hill and currently suffering from significant flooding to our garden. This matter is currently under investigation by the lead flood authority. We are very concerned that any further building development in the Leckhampton/Warden Hill area will have a detrimental effect on our current situation and bring future flooding implications.

The interests of existing residents should not be compromised by future building development.

327 Old Bath Road
Cheltenham
Gloucestershire
GL53 9AJ

Comments: 15th January 2021

I am writing to comment on the Miller Homes planning application to build 350 houses at Shurdington Road (20/01788/FUL).

I have viewed the proposal and am saddened to see that the location for the estate would be a large area of beautiful countryside which I and my family often enjoy walking in. The ability to access a truly natural area with public rights of way without needing a vehicle to travel to it has been so important to us and to many others this year, but access to such area is being increasingly eroded in Cheltenham with the construction of more and more estates where there were previously fields.

Before my family moved to Leckhampton we lived in rented accommodation with no outdoor space in Tivoli: the proposed area for the Miller Homes construction was reachable on foot from our flat and provided an escape from our urban environment. Following the public footpath along hedges full of wild damsons and finding a field of sheep, a beautifully tended allotment, chickens and ducks - this is a magical, restorative experience that will be lost.

The special character of Leckhampton, and of Cheltenham more widely, comes from its proximity to the countryside. It is not a faceless urban sprawl of estates but is interspersed with pockets of unspoiled nature. This special character will be irretrievably destroyed if green areas like the Shurdington Road location are flattened and built on.

21 Hawkswood Road
Cheltenham
Gloucestershire
GL51 3DT

Comments: 15th January 2021

I write in respect of the Miller Homes Planning Application 20/01788/FUL for 350 homes on Leckhampton Fields.

I object to these mainly on the following reasons.

1. Unacceptable damage to the landscape and ecology/wildlife. Surveys have not been updated as regards protection of dormice, hedgehogs, great crested newts, bats etc, all of which reside in this area and are considered protected. The Construction of a Landscape and Ecology Mangement Plan needs to be produced and agreed before any development were even to be considered. As dormice have been found on the Northern

Fields, this will have implications for hedgerow/woodland retention and planting plans. The surveys must be done before any approval was even considered.

2. Traffic Congestion - Traffic mitigation was a condition for including the development in the Cheltenham Plan due to the high risk of severe traffic congestion. The development needs to be refused until the traffic impact from the new school and other existing developments is clear and the cumulative traffic is seen to be acceptable. We live opposite the A.46 off Woodlands Road. The traffic now is horrendous - future traffic following development of the school and dwellings will be catastrophic and will result in gridlock for the local area.

There is insufficient road width to accommodate any extra road width to make an extra lane. The mitigated measure with lanes 2.5 metres wide is allowed for cars only. The A.46 is a major road with bus routes (buses are 2.55 metres wide) and also large lorries which can be up to 2.6 metres wide. Government guidance is that where roads are wide enough, the bus lane should be 4.25 metres wide (the minimum should be 4 metres which allows buses to overtake cyclists). Therefore, the 2.5 metre width is infeasible and the application fails to meet Inspector Burden's condition for allowing the allocation of the Miller Development (as well as the school) in the Cheltenham Plan. I would like to know how the Council find it acceptable to overrule the Government officials, especially when our Prime Minister is stating how we should all save the environment, green spaces etc.

3. Flooding to The Woodlands and Warden Hill. We live opposite the proposed Miller development. Several gardens backing onto the Shurdington Road, still regularly flood in heavy rain. Recently the flood water only just stopped going into the premises. In earlier years, the water has gone through homes which has resulted in many months of misery for the residents, who had to dry out their properties, fit new furnishings, new electrics etc. One local gentleman has a chicken run which is constantly under flood due to water cascading across the A.46. He has now had to raise the floor of the run.

The vulnerability along Hatherley Brook needs checking, as development on the Northern Fields will remove the option to use the land to hold back flood water. Flooding appears to be by water flooding under the A.46 from these fields. This was considered in the flood risk analysis for the 2013 Bovis-Millar applications, along with the risk that underground flow could perforate any balancing pools. It was concluded that it was impossible to predict what may happen and remedial measures would be needed if problems arose either to the balancing pools or homes north of the A.46. Weather conditions have deteriorated since 2013 and the situation looks like it is only going to worsen, especially if all the developments are taking away land that could have soaked up the majority of rainfall.

Another question - who is responsible for maintaining the balancing pools? At one meeting about another proposed development in the area, we were told by the developers that it would be the responsibility of the Council. The Council said the developers would be responsible. Who is right? What measures will take place if the inevitable happens and homes flood. Will the Council be paying for refurbishment of homes affected??

We ask that planning permission for these 350 homes be denied.

19 Collum End Rise
Leckhampton
Cheltenham
Gloucestershire
GL53 0PA

Comments: 15th January 2021
Letter attached.

84 Farmfield Road
Cheltenham
Gloucestershire
GL51 3RA

Comments: 19th March 2021
Letter attached.

Gloucestershire Community Rail
Partnership

Comments: 10th December 2020
Letter attached.

49 The Park
Cheltenham
Gloucestershire
GL50 2SD

Comments: 16th December 2020

This development will impact the valued landscape, there is inappropriate infrastructure in place to accommodate this volume of new housing and it will increase local traffic congestion, especially on Shurdington Road, which is already backed up every day in the morning and evenings.

24 Chelmsford Avenue
Cheltenham
Gloucestershire
GL51 3DN

Comments: 15th January 2021

I object to the Miller Homes application in the strongest possible terms with regard to areas R2/R3, in 2016 inspector Ord concluded that development was unacceptable on landscape grounds. The R2/R3 area is also part of the area identified by the Secretary of State in 2016 as valued landscape that should be protected and enhanced in accordance with the National Planning Policy Framework (NPPF).

Added to this Dr Adrian Mears has written many papers providing valuable data on the concerns around traffic congestion, air pollution and potential flood risk, all of which for

some obscure reason seems to fall on 'deaf ears'. The whole of this area is being blighted by over zealous development, please do the right thing and refuse this application.

31 Princes Road
Cheltenham
Gloucestershire
GL50 2TX

Comments: 15th January 2021

I live in Tivoli, where the Shurdington Road is the main route out of town to Painswick, Nailsworth, Stroud, M5 South and (avoiding motorways), places like Bath. The development will not only detract from green space but put considerable additional strain on a road which is single file and can become blocked simply because a bus stops to pick up passengers. The lack of park & ride facilities to the south of town makes things even worse and the sprawl of this development will also remove a potential site from this, which would have alleviated some of these pressures. If locals begin rat-running to avoid an increasingly clogged A46, the situation in the Leckhampton and Birdlip areas will become even worse, particularly if road works commence on the A417. Please consider the effect of up to 700 cars coming and going on school runs, errands, etc., on this already congested road and area and call the application in until these issues have been resolved.

24 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 22nd January 2021

There have already been over 300 new houses built nearby in the last few years.

The traffic along Shurdington Road is already horrendous at peak times. This area is becoming saturated with new buildings.

There has been flooding in this area and this will only make it worse. The infrastructure in the area will not support more houses.

Environmentally this is an extremely worrying development.

I object strongly to this application.

8 Leckhampton Farm Court
Leckhampton
Cheltenham
Gloucestershire
GL51 3GS

Comments: 24th November 2020

I object to the above planning application on the following grounds:

1. Having read the Transport Assessment, it is difficult to detect any effective co-ordination between highways proposals put forward by Redrow, Gloucestershire County Council and Miller Homes, each of whom have put forward suggestions to mitigate the prospective traffic impacts of their developments. From the point of view of a road user, there needs to be comprehensive harmonisation of proposals such that all of the claimed benefits are evident and assured.

2. Many of the "supporting" photographs showing the surrounding areas are out of date in that they do not adequately show the development that has taken place over the last couple of years. The lack of accuracy in these photographs implies a location and situation that no longer exists and therefore they are misleading and have no supporting role to play.

3. The planning application says that the proposal falls within Policy MD4 of the Cheltenham Local Plan, and that this policy includes:

"A layout and form of development that respects the visual sensitivity and landscape character of the site as part of the setting for the AONB"

. The "layout and form of development" that Miller intends to construct on this site can be found far and wide across the country, and therefore there is no specific respect for or relevance to the visual sensitivity or landscape character of the site in Leckhampton. Miller Homes are proud of their "huge selection of new-build properties [which] covers the country from the South East up to Yorkshire, the North West and Scotland." Merely replicating their densely packed housing developments in Leckhampton, including the same house types as used elsewhere in the country, does not meet the requirements of the adopted Cheltenham Local Plan.

. The proposed development includes 2.5 and 3 storey buildings which do not reflect in any way the landscape character of Leckhampton. Regardless of how many or few of these buildings there may be, they are out of place and should be removed.

4. With regard to the proposed mitigation of the inevitable traffic problems associated with the proposed development, the application claims that the JCS Transport Evidence Base/Strategy confirms that the outcome of proposed changes resolves delays along the Shurdington Road corridor.

It is unlikely that this conclusion can be drawn from the JCS as the adopted JCS did not anticipate the high level of development currently being proposed. The JCS considered that this level of development was unsound and stated, as Leckhampton had been taken out of the JCS as a strategic allocation, a figure of about 200 dwellings might be appropriate. Importantly, the figure of 200 excludes the 900 pupil school currently under construction next door. Using the JCS evidence base to confirm that delays along the

Shurdington Road would be resolved for this amount of development is almost certainly inaccurate as well as inappropriate.

5. The application makes a glaringly mistaken assumption that the conditions attached to the Redrow development to the west of Farm Lane, will be/are being implemented. This is an ill-advised approach, as 12 of the 28 conditions attached to this development have been breached. More specifically, Redrow's conditions 16, 17, 18, 19, 20, 21, 27 and 28, as referred to in the Miller Homes application, concern supposed highway improvements and in June 2018, 7 of these 8 conditions had already been breached. In acknowledging these breaches, the local planning authority (Tewkesbury Borough Council), said:

"I fully understand that it can be frustrating for local residents when it appears that Developers are not meeting conditions attached to planning permissions. Nevertheless, the council's planning enforcement powers are discretionary and action will not be taken simply because there has been a breach of planning control."

TBC have decided not to make use of their own Planning Enforcement Policy and have made a mockery of so-called planning conditions. Miller Homes and CBC cannot rely, therefore, on the highway improvements associated with the Redrow development and the traffic implications of the Miller application need to be re-appraised.

6. The anticipated modal shift from private cars to walking, cycling and public transport, as expected of the occupiers of the proposed development, does not make any allowance for age, mobility, disability, bad weather, winter conditions or darkness. Despite there being some facilities within walking or cycling distance for those who are fit and able enough, there will be many other facilities which are not within walking or cycling distance for the majority, especially employment. The proximity of a supermarket is mentioned several times but it is highly unlikely that those wanting to do anything other than a very small amount of shopping will go on foot or by bicycle. The lack of any reference to these practical considerations calls into question the traffic assumptions incorporated into the application.

7. The general quality of the application is poor and invites inevitable questions over its veracity and reliability. Some examples include:

- . The use of an inconsistent and confusing mixture of miles and metres.
- . The out of date supporting photographs - see item 2. above.
- . Shurdington Lane is mentioned but there is no Shurdington Lane.
- . the "Shurdington development" is mentioned more than once and is described as 350 dwellings and associated access. Is this the Miller Homes application 20/01788/FUL currently under consideration? If so, Miller Homes and their associates need to know that it is not in Shurdington but is in Leckhampton. This fundamental confusion by Miller Homes undermines their understanding of where they want to build, the associated valued landscape at Leckhampton and its relationship to the AONB.

Conclusions

- Items 1, 4, 5 and 6 above each have a potentially significant and detrimental effect on the assessment of the traffic impacts of the proposed development. Inappropriate assumptions have been made, based on the wishful thinking of those who clearly do not know the area. The traffic impacts of the development need to be re-evaluated in order to have any credibility.

- The application reveals that the applicant thinks the occupiers of the development will fall into a generic profile which can then be manipulated into behaviour which fundamentally alters their inclination to use a private car. A similar generic view has been used to assume that house types and layouts used elsewhere in the country are appropriate for this site in Leckhampton. These questionable attitudes do not engender faith in the integrity of the application. The developer needs to inject some pragmatism into their thinking; the occupiers of the development need to reflect a realistic population following realistic behaviours, and the visual sensitivity and landscape character of the site, as required by the Cheltenham Local Plan, must be demonstrably taken on board.

- Miller Homes need to pay significantly more attention to the location and nature of their proposed development if they do not wish to alienate the existing community. The Local Plan with which they need to comply, includes requirements which are not being incorporated. The development does not comply with the JCS and it would be very unfortunate if the development were allowed to proceed even though it does not comply with the Cheltenham Local Plan either.

17 Beeches Road
Charlton Kings
Cheltenham
Gloucestershire
GL53 8NG

Comments: 24th November 2020

Living Streets Response to 20-01788-FUL - Miller Homes Development

This is to suggest changes to proposals to

1. Improve vehicular access to the main part of the development site
2. Improve connectivity to existing nursery and primary school for residents
3. Ensure a safer route for pupils of the proposed school from the southern part of Cheltenham avoiding Shurdington Road

Shurdington Road is a busy road.

There is only a continuous footway on its northern side - it is not particularly wide - 2 people passing need to squeeze up. A pushchair for triplets would have difficulties passing lampposts.

Often pedestrians have to wait awhile for the traffic to abate before crossing it to get to the bus stop on the other side.

Traffic proceeding along Shurdington Road towards Cheltenham will be halted whilst vehicles turning into the Northern part wait for a gap in the traffic leaving Cheltenham as there is no provisioning of a separate right turning lane.

The proposals suggest that vehicles leaving the northern part of the site will also need to wait a considerable time if they wish to turn right to Cheltenham.

Indeed it will often be quicker to turn left instead and drive round the proposed roundabout to turn in the direction they wish to travel.

This could be avoided by making the sole vehicular access to both the north and south portions from the proposed new roundabout.

It is proposed that vehicles wishing to drive to Cheltenham from the southern part of estate first turn right onto Kidnappers Lane.

This will be very difficult as at the end of the school day there will be much traffic from the school. That traffic will queue along Kidnappers Lane awaiting a break in the traffic along Shurdington Road from Cheltenham.

This situation will also occur at the start of the school day when pupils are being dropped off by their parents whom then return to Shurdington Road to go on their way. As this coincides with the residents leaving for work this is probably more likely to prove to be worse problem.

It would be better to make 4 exits from the roundabout where one services the North and South parts of the development exclusively.

Footway

Needs to be extended along the south side of Shurdington Road from the existing footway to the roadway of the new development on the western side of the Northern part of Miller Homes site.

From this new footway pedestrian access through the Miller Homes site to the new school bypassing much of Shurdington Road.

Facilities

The new residents will seek facilities such as creche and nursery education for their children.

An option is to use those provided on the Burrows Sports Field. These can be accessed from the public footpaths that lie on the southern and eastern side of Northern portion of the site.

However as they are unsurfaced baby buggies will get bogged down in the mud.

There is therefore a need to tarmac parts of those paths.

This could also provide an access route to Leckhampton Primary School

Indeed by widening the slab of concrete on footpath ZCH80 over the culverted brook it could serve as a cycleway to the new school from Allenfield Road - creating a route that avoids Shurdington Road.

This requires the creation of a new route that is not shown on the developer's plans directly opposite Allenfield Road.

Pedestrian Access to New School

Present

From Shurdington Road

A footway barely wide enough for 2 pedestrians to walk abreast on 1 side of Kidnappers Lane.

From Leckhampton - via Kidnappers Lane

No footways

Along Farm Lane

To Brizen Lane

A footway barely wide enough for 2 pedestrians to walk abreast on 1 side of Farm Lane.

Brizen Lane to West Barn House

A footway shared at times with passing traffic a person wide on 1 side of Farm Lane

West Barn House to Church Road

No footways.

This is totally inadequate.

Summarising

Miller Homes might be willing to provide sufficient access through their site for pedestrians and cyclists from Shurdington Road but the dangers from the traffic along Shurdington Road make this an undesirable route and other quieter access say via Merlin Way need to be promoted.

1 Charnwood Road
Cheltenham
Gloucestershire
GL53 0HN

Comments: 25th November 2020

350 homes is too many, too intensive for this area. The infrastructure won't cope for a start. A lot of green space is already being lost to the new secondary school, which is a top priority for Leckhampton and much needed.

Another huge housing estate along with the Brizen Lane development is not a priority and the detrimental effects and loss of open space outweigh the need.

7 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0AX

Comments: 25th November 2020

My concern is that the current infrastructure i.e. Shurdington Road, Church Road, Farm Lane, Kidnappers Lane, is already overcrowded with traffic at peak times of the day - particularly between 7am - 9am. This new proposal of an additional 350 houses will add considerably to this. The new senior school that is being built will by Kidnappers Lane will certainly add even more traffic to these roads.

Comments: 29th September 2021

I would like to add my name to the people who have already objected to this planning application by Miller Homes.

I have serious concerns to this development for several reasons:

Because of the large number of houses and the impact this will have on the local area in terms of additional traffic, pollution, increased risk of flooding, damage to the environment, wildlife and the increased urbanisation of this area of Leckhampton.

Traffic levels along the Shurdington Road, Farm Lane, Kidnappers Lane, Church Road is already extremely busy - particularly in the mornings and evenings during the 'school run' and commuting to work times. The current infrastructure is already struggling with the level of traffic. The new school that is being built will bring many more cars onto the roads.

Noise and pollution levels will inevitably increase with more vehicles, when we need to lower pollution to improve air quality. The increase in traffic would further impact on people's health - particularly children's health.

This proposed development would also increase the risk of flooding - you only need to look at some of the photos submitted by local people to see the flooding that has already occurred in recent years.

I really hope that this planning application by Miller Homes is refused for the reasons I have already mentioned.

2 Merlin Close
Cheltenham
Gloucestershire
GL53 0NF

Comments: 26th November 2020

I strongly object to, and am deeply disheartened by, this planning proposal to build 350 new houses in Leckhampton.

There are many reasons for supporting the refusal of more development in the area:

In 2016 the Secretary of State concluded that "sections of this highway network are already operating at over-capacity levels". His advice should be heeded.

The Shurdington Road is a traffic jam at the best of times, with Church road, Leckhampton Road etc witnessing a rippling, chaotic effect. With the additional school traffic yet to be added, the traffic will become unbearable.

All further development of the green space east of the A46 will undoubtedly increase the water runoff to Hatherley Brook and the risk of flooding will be much higher. It is only natural for existing residents to want to protect their properties and the surrounding land.

The new Leckhampton School is in the process of being built. Isn't it defeating the object to build this already 'highly in demand' institution, only to saturate the catchment area with potential new applicants?

This proposal shows complete disregard for the existing wildlife in the area. You cannot expect those creatures that survive in the area to stick to the rules that will be applied. Animals do not understand allocated nature reserves, roads, walkways, allotments, and human activities. Undoubtedly, many potential residents will vilify 'intruding' creatures that are only roaming what was previously their territory. The increase in activity and noise will have such a detrimental effect on our local wildlife which include, a diverse number of birds, bats, foxes, dormice and reptiles to name but a few.

It is also despicable the way that decisions can be made remotely to run roughshod over the environment of the existing inhabitants of the area who are finding their rural setting becoming increasingly urban.

In conclusion,

Enough is Enough. This area was originally highlighted to be protected. That was before the 'powers that be' decided to back track. This is overkill. More development will undoubtedly be unsustainable for this area.

Therefore, I strongly object to the planning proposal for the building of more houses and change of use of the allocated land.

Thank you for your consideration in this matter.

Firth Lodge
106 Shurdington Road
Cheltenham
GL53 0JH

Comments: 3rd December 2020

I agree with all of those who are objecting to this planning application who have concerns over flooding, extra traffic, pollution etcetera, but I am also most disappointed that Miller Homes have not approached us in regards to the new access road that would need to be constructed immediately next to our boundary. You would think that an on site consultation to discuss the impact on us would be the very least that they should've done. I therefore strongly object to this development in its current form.

80 Rowanfield Road
Cheltenham
Gloucestershire
GL51 8AG

Comments: 4th June 2021

I object primarily for the same reasons as outlined by the Cheltenham Green Party. Any meaningful engagement with CBCs ambition (and duty) to combat climate change should require any new development to be at least carbon neutral. As seems clear from the developer's recent response on energy concerns (28 May), it will only do the bare minimum, which seems a long way short of what is fairly obviously required. Given recent legal decisions concerning obligations of governments (and companies) on steps to tackle climate change, it seems of increasing importance to give more than lip service to carbon neutrality targets.

1 Merestones Close
Cheltenham
Gloucestershire
GL50 2ST

Comments: 23rd November 2020

MERESTONES RESIDENTS ASSOCIATION

The Merestones Association is aware of the above Planning Application and submits the following comments on behalf of our membership which comprises some 150 households.

1. The Merestones Estate is located downstream from the above site and is directly in the watershed of both the Hatherley Brook and another tributary which discharges from the above site, all as shown on the plan. We have often registered our concerns on behalf of many of our 'Council Tax-Paying Members', who are located in the lower reaches of our estate as and when the water -levels rise which seems to be occurring more often. Whilst it is noted that Balancing Lakes are proposed within the proposals, we hold the Borough Council responsible in ensuring that the run-off calculations are correct.

(On this aspect we are sending a copy of this letter to all our affected members so they in turn can advise their respective Property Insurers)

2. There is however, one anomaly within the submitted documentation in that we are unable to be sure that the applicants have actually included any such retention facility in the vicinity of Balancing Lake 'B' on the plan which is essential. Any attempts to obtain any clarification on this point have been unsuccessful...from both the applicants and the Borough. We have therefore included it on the plan as shown.

3. Still on the subject of flooding, this seems like a heaven-sent opportunity to clean out all the debris/tree roots etc., along both water-courses passing through the Merestones Estate as shown on the plan. With such a large and overall comprehensive application, there cannot be much dispute that this request comprises an integral part.

4. Finally, it is essential that all these items, as well as any other infrastructure matters,

ARE COMPLETED PRIOR TO THE COMENCEMENT OF ANY HOUSING CONSTRUCTION.

14 Wells Close
Hatherley
Cheltenham
Gloucestershire
GL51 3BX

Comments: 17th December 2020

I am a resident of Wells Close, Warden Hill, having moved here in December, 2019. Over the last 6-8 months, I have become increasingly concerned at the way in which the local council appear to have authorised new housing developments to the east of A46/Shurdington Road, notably the Redrow Development, and more recently, the proposed Miller Housing Development. Whilst I accept and fully support the need for housing in this area, I feel that the urge to satisfy a Government-driven policy is outstripping a parallel need to protect pre-existing housing within the area, and I strongly feel that it is now time to redress the balance between 'new housing' and our failing sewerage/drainage infrastructure which seems to manifest itself all too often in this area. Prior to buying our bungalow, we carried out extensive research utilising 2019 Environmental Agency maps of the area. We quickly established two properties at the end of Wells Close were at risk of flooding, but our chosen property was shown as free from risk. However, after having occupied the property, we were also made aware that the above two bungalows had been badly flooded twice during a 15 yr period (2007 and again in 2016), but we were assured that our property had not been flooded.

In June 2020, Wells Close, Farmfield Road, Salisbury Avenue, and Lincoln Ave / Winchester Close were again the subject of heavy flooding, and following this event, many of our Wells Close residents reported sewer water had reached the top of their manhole, and in places had breached and contaminated gardens, particularly in the case of the two fore-mentioned bungalows, which were subjected to serious internal fabric / content water damage. Thankfully, we were more fortunate, having placed sandbags to cover ground-level air-vents and protect the internal (wooden) floors. During the 30-

40minute downpour I watched all of our roof water being forced upwards from the land drain, as the drain system could not cope, an issue being repeated along the length of the street. Within the 10 minutes, I was standing in 6" of floodwater running the length and three sides of my property, with no outlet to allow it to drain away. Having barricaded my vents, I offered assistance to neighbours, and I was totally horrified to see 10" deep water encircling their newly purchased bungalow, having accessed their property from two directions : (1) runoff from Welsh Close Road, and (2) heavy runoff from across rear gardens, clearly flowing from Farmfield Road. We all felt totally helpless, and emotionally gutted for the young parents involved, with a newborn child. It was a heartbroken situation.

Following this event, a neighbour & resident of Wells Close arranged a meeting with representatives from Severn Trent Water, the Highways Department, and our local Lib Dem candidate, to discuss what action could be taken to alleviate our flooding issue. The meeting was held in July 2020, at the end of which we were informed that all of the parties concerned would work together to establish what action could be taken to improve our situation. To date, no material report has been forthcoming, so we feel that we are no further forward, albeit soon after the meeting we saw a kerbside drain-cleaner attended the Close in Aug /early Sept., and we believe that STW have now initiated a camera search of the local surface-water drains in the Close. We await a formal response to their findings, especially in the light of the renewed concern we have over the Miller Housing application, as it now appears that we have an escalating situation, with the potential for further pressures being added to our ageing system.

Historically, when Tewkesbury Planning Team permitted the Redrow Development east of Shurdington Road, they have allowed that developer to feed the authorised development's foul water into the ageing Warden Hill sewer system, (which we know was already showing its age and failings both in 2007 and 2016), well before they authorised that planning application. Likewise STW would have been aware of that flooding problem issue across the Warden Hill area, and yet they too authorised and countersigned the Redrow application.

We now have Miller Homes ambitiously offering to feed another 350 homes' sewer water supply into the ageing and overworked Warden Hill sewer system, with the inevitable consequences which are clearly likely as/when we get the next torrential downpour. In all their various reports, Miller Homes modelling agents refer to a mystic "1:100 and/or to a 1:1000 storm event". Perhaps someone could politely point out to them that this "event" they seem refer to is no longer valid, as we now know that we have already experienced three such events in the last 20 years, and armed with this knowledge, we can expect that this is likely to become the norm, particularly as climatic changes take effect, and our weather patterns become more extreme and storms become more common. It is time that these 'modelling practitioners' amended their outdated projections to provide realistic forecasting in line with real-time climatic data for future planning guidance. Such data is readily available on the web.

I also take note that STW have already undertaken some restorative work (back in 2017/18) to the main water ditch which runs along Farmfield Rd but it remains a fact that both the sewers and the surface water drains along this local area cannot cope with heavy rainfall. Add to this the sheer stench of sewer odour escaping from the manhole situated in the middle of Farmfield Road at the intersection with Wells Close / Morrison's footpath, it is clear that there s an ongoing issue at this location which STW have failed to rectify, as I am aware that the local resident, living immediately next to the manhole, has

repeatedly reported the problem but despite their attendance, the overpowering odour has continued through out the summer and autumn months this year.

Perhaps this manhole merits a closer inspection, and/or re-laying, as it certainly makes a very loud 'clunk' as vehicles drive across it. Similarly, as my wife and I walk along Farmfield Road several times a day, we frequently see kerbside drains struggling to deal with the results of any heavy rainfall, (primarily due to a build up of leaf debris). Likewise, we have noted regular build up of tree/leaf litter against the galvanised grid erected to protect the entrance to the land-drain running along the length of Farmfield Rd. Clearly this feature requires a regular 'spot check' by the council if we are to avoid unnecessary blockages and widespread flooding of properties along this road.

We have reviewed the Miller Housing proposal, along with the supporting Severn Trent Report (undertaken by Black & Vetch, 7th July 2017, and we would draw attention to the following:

They state : "There are known capacity issues along one of the downstream sewers in Lincoln Avenue and Sainsbury Avenue". (Appendix A. - Fig A.2).

We have been informed by neighbours that some work was carried out to the Salisbury Ave sewer, but would question whether this work has resolved our local flooding issues. If it has cured

flooding issues, why did we again experience such a significant blockage in this latest event (June 2020), which devastated several streets in the area, including our own. We are given to understand the pressures involved in the sewer system forced one manhole lid skywards, resulting in a spectacular artesian display in Salisbury Avenue.

In their planning model, the report authors fail to indicate to what extent they adjusted their modelling to allow for the near 80% clay content of the area's surface geology. This is a significant factor, as ground water infiltration simply does not exist across much of this area, an issue voiced by every gardener, builder and land drainage workman spoken to since our arrival here in December 2019. The authors also state: "There is a CSO (Combined Sewer Overflow) downstream of the development, but it (the CSO) is not affected by the development site". They concluded : "Capacity improvements are not likely to be required to accommodate flows from the new development. (viz. the Miller Homes site)."

Are they serious? How can they possibly say this when we know that the volume of surface water hitting our drains during the June 2020 event totally overwhelmed the local drainage system, and the manholes, which according to the earlier Redrow Development Modelling reports suggested ..."should only lead to a 60cm rise in foul-water levels within Warden Hill domestic manholes" were described locally as having swamped to lid level by rising sewer water, and in some places, overflowed across gardens and into homes in Wells Close, Salisbury Ave and Farmfield Rd. Clearly Tewkesbury Planning believed the report and authorised the plans for Redrow, yet we have evidence to show that it displaced manholes at Salisbury Ave and at Farmfield Rd.

On their 'Drainage Layout Plan Phase 1', the authors also indicate surface water is to drain to Pond A, and this 'pond' is then designed to overflow in to Hatherley Brook (which in turn flows towards Warden Hill, Woodlands Road and the St Michaels area, a cause for further concern for any future high volume rainfall events.

Likewise, the Patrick Parsons's (June, 2019) Risk Assessment Report, Fig 4.1 shows a map of JBA's Flood Mode. This map suggests that the report incorporates only a small snapshot of local flood risk areas, specifically around Shurdington Rd, Hawkswood Rd and Woodlands Rd areas west and North West of the proposed development. Do we therefore assume that they have excluded (or eliminated the impact) the well documented flooding events of the 2007 & 2017 events (previously mapped by the Environment Agency), specifically along Farmfield Rd, Wells Close, Salisbury Ave, Lincoln Ave and Winchester Avenue? One would have thought it would be very appropriate for them to have included this data in with their modelling data to give an accurate overall impact assessment to the effect of having this new '370 home development and its associated expanse of hard surface, on the local community / housing / sewer system ...viz Warden Hill. Note: The report recognises the value of a BGS geological report for this area, in which the surface geology is described as ground 'made up primarily of clay, and as such, prohibits the use of infiltration disposal of surface rainwater'. This means all surface water has to be disposed of by sub surface pipework, shallow drains or culverts, or existing natural brooks. This then enhances their inbuilt reliance on having to connect (A) (B) & (C) drainage Ponds to existing brooks. Their report also talks of "the majority of rainfall run-off from the ground from Leckhampton Hill as already being directed via 'Leck 2' and 'Leck 3'". It seems logical to conclude that the 2 brooks concerned would also be expected to deal with the inevitable 'excess overflow' from Pools (A) & (C) under this Miller Homes proposal. This will all add to the water input into the land north of Warden Hill, which in turn, would have an impact on Warden Hill groundwater.

The author refers to a '1 in 100' year storm event, and a '1 in 1000' yr event, and suggest that the drainage works designed for this estate are in accordance with "Sewers for Adoption Parameters to allow no flooding for up to 1:100 year storm, plus climate change. Sadly, these terms appear quite meaningless, as climatic change is upon us now, and already impacting on our weather, and it is not going away, anytime soon!

Severn Trent also conducted a SCA (Sewer Capacity Assessment) for this development back in July 2018, (Ref. DE-1704-859), in which they sought to establish the capacity of foul sewers located between the site (Millers Developments), and downstream trunk sewers, to receive all the sewage generated by this new development. (Note: This STW report was undertaken between July 2018 and June 2019, so they would have been aware of the impact of the 2017 flooding on our area). It would appear that they accepted, in principle, 2 x sewage discharge points for this new estate ... (Location unspecified in the document, hence TBA!), and added that ..."the risk of sewage flood damage is deemed negligible to the development, and adjacent 3rd party land". Do we therefore assume that when they have researched this issue, they have limited the 'impact boundary' to the immediate area around this new estate? If so, what about the Warden Hill area, with its long-running battle with sewage and surface water flooding, which is fully documented and they are they rare fully aware of Surely this should also have been a major issue to add to their matrix modelling as this would have had a significant bearing on the overall modelling for this new estate. Clearly the additional influx of sewer or surface water into this old drain & road system would only exacerbate an already fragile hydrological system in this area. I believe that Tewkesbury Council's willingness to grant Redrow Developers access to a pre-existing old sewer systems was a major failing for this area, as it will have compounded a pre-existing problem which is now being felt across Warden Hill, and to date, it does not appear to have been resolved.

Where does it all end? and ...What retail value will our 'forgotten homes' have in 10 or 20 yrs time, when the flooding risk map has been inevitably changed following years of hydrology neglect, and our local area becomes a mass of dark blue!

I would be grateful if you could include / address my concerns in your report when you respond to the Miller Homes Development application, which I believe is due to come back before Cheltenham Planning in Jan / Feb 2021.

Thank you in advance.

Comments: 1st December 2020

Could someone please inform us where Miller Homes's Phase 2 Foul Water will go to?

Whilst we accept there is need for further housing in this area, there is also a need to re-invest in our older pre-existing estates, and ensure repair / replace of failing surface and sub-surface water networks.

In June 2020, several areas of Warden Hill, Salisbury Avenue and Winchester Way experienced flooding after 40 minutes of torrential rain, which caused surface water drains and local sewers to fail, breaching manholes, and damaged several properties.

In April/May 2020 Tewkesbury Planning Authority granted Redrow Development permission to dispose of foul water directly into Warden Hill's existing sewer system. This was a very surprising move, as Warden Hill's sewers are already over 65 years old, and as such, have shown themselves to be failing occasionally under the increased pressure of prolonged heavy rainfall (Cf. in 2007 & in 2016, and now yet again in 2020). Severn Trent Water would have been aware of these issues in 2017/2018, but they too signed off the Redrow application.

We now have Miller Homes applying to erect 370 houses on this new development, in two separate Phases.

(1) Phase 1's sewer water is shown as running NE along the Shurdington Road, whereas

(2) Phase 2 appears unspecified. From the plan it would appear that this may eventually flow into the Warden Hill via the Shurdington Rd? If the latter is true, then we have real concern with this proposal.

Could we respectfully ask Cheltenham Planning to clarify this area of concern, as it would have repercussions for our estate. Warden Hill sewer / surface water drains clearly already struggle to cope with excessive rainfall events. Miller Homes modelling talk of their systems being designed to cope with 1:100 or 1:1000 storm events. This is inappropriate optimism, as severe rainfall events now impact on the UK every 3 -7 years, not every 100 years, and as such their 'modelling' is quite flawed, and totally out of step with real-time climatic data.

We are aware that S.T.W undertook repairs to the Salisbury Ave sewer, but as this again failed again in June 2020, one cannot help but question whether STW they successfully resolved the issue, as manhole lids were again blown clear with spectacular force. STW also undertook restorative work to a water ditch in Farmfield Rd (in 2017/2018), but it too remains a fact that the remedial work undertaken to date do not seem to have curtailed the latest flooding seen there in June 2020.

Where does this leave us, and what resale value can we expect for our homes and life savings investment in 5-10 years time should the flood risk for this area be exacerbated as a direct result of new developments such as that at the Redrow Homes and the new Miller Homes Developments?

I would thoroughly recommend your readers visit Miller Home's Planning Application Planning, available for public scrutiny, via <https://publicaccess.cheltenham.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=QI8BWZELLQM00>.

I would be grateful if you could include my concerns in your report when you respond to the Miller Homes Development application, which I believe is due to come back before the County Planning Team in the near future

73 Church Road
Leckhampton
Cheltenham
Gloucestershire
GL53 0PF

Comments: 21st December 2020

I support the representations submitted by the Parish Council. The application should be refused unless it is amended in the manner it recommends, for the reasons it has given.

74 Canterbury Walk
Cheltenham
Gloucestershire
GL51 3HF

Comments: 13th January 2021

Firstly the website given through the postal plan I received for Miller app chelt ,does not get recognised,so great idea for the public like me to not have access.

Like all projects over the country,the biggest shortfall the contractors make ,is not making the infrastructure a priority over all else.

For the sake of satisfying the new occupants and indeed the old neighbours,it would be so good to have a detailed meeting to help assess the needs of both parties.Any other move would be shortsighted and ignorant.

We know every sq metre used for a better infrastructure,means less property being built ,but this very greed needs to be curbed.

It's extremely important to use this discussion time to understand such measures of parking cars(the car will always be a factor),and proper ,well organised roads ,without making access for new and older residential properties,unattractive.

It is very shortsighted for Miller to not engage and surface these very factors, because the worth of Miller's reputations can hang very much in these plans.

If by any way, the infrastructure, to include some retail conveniences, is ignored, then the hassles that go with this project will obviously follow for years on.

Comments: 13th January 2021

This project needs to have a serious consultation from Miller and neighbours and /or prospective residents.

The shortsighted views from contractors, that involve every sq metre being used for property, is a mistake from the outset.

The infrastructure is the most important part of any such project and with this concern, will inevitably make the whole project exciting and more attractive for all concerned.

I have seen the needs of the new and old residents ignored time and time again, but this always concludes with objections and ends up, the residents being totally dissatisfied with their new home.

If greed takes hold, then Miller homes would rather build an extra 10 homes, instead of surfacing the very conveniences as a must and not a possibility.

This is set out for Miller to listen to the very important part of any local community, and we want the needs to be considered before one inch of ground is developed, as a matter of respect.

4 Cornflower Way
Witcombe
Gloucester
GL3 4XJ

Comments: 13th January 2021

I strongly object to the current proposals. The traffic on the Shurdington Road is horrendous during rush hour as it is. The new school will only make this worse and new Miller houses on top will be the final straw - Shurdington Road simply cannot cope with another 350 houses. The pollution levels are unacceptable (I agree with the Clean Air Cheltenham report).

If any houses have to be built at all, the number should be as low as possible - certainly sub 200 and nowhere near 350.

Query whether local amenities (doctors etc) have the capacity to deal with a significant number of people/families moving into the area.

14 Nourse Close
Cheltenham
Gloucestershire
GL53 0NQ

Comments: 14th January 2021

This area has been swamped with development in recent times - when is enough enough!

It seems to matter little that the implications on local infrastructure, pollution, congestion etc. etc. are paid scant regard to and the usual valid and oft stated local objections and Inspectors reports have done nothing to hold back the already sanctioned and ongoing activity (Redrow and school).

Yet another building spree in a more critical and central position will only exacerbate the detrimental effect on the local community, particularly traffic congestion on the Shurdington road and adjoining areas and and the knock on effect on pollution levels. What a joy we have to look forward to when normal post Covid activity resumes, the school becomes operational and hundreds more houses are packed into Leckhampton!

Tewkesbury Council's blithe out-of-sight out-of-mind planning approach re the Redrow estate has blighted the area and is a precursor to the creation of just yet another built up suburb where there was once Leckhampton.

It is a forlorn hope that this planning application will be rejected given the mass scale of what is already afflicting us.

45 St Michaels Road
Cheltenham
Gloucestershire
GL51 3RP

Comments: 14th January 2021

I object to this application :-

- 1) Yet more Green field sites will be covered by bricks & mortar and tarmac.
- 2) There are sufficient Brownfield Sites within the Cheltenham Town to fulfil all new housing needs.
- 3) The only access from this site is onto the already 'nose to tail' traffic on the A46 Shurdington Rd
- 4) There will be even more traffic when the new Leckhampton School on Farm Lane is operational.
- 5) It will cause yet more water spill off into the local watercourses which are fed by the drain off from

the hill escarpment and cause more flooding off an already wet and boggy area of fields below the hill and Leckhampton Church Road.

There is a row of Natural Springs, between Farm Lane, Lott's Meadow and Burrows Sports field which drain into both the Hatherley Brook and tributary. Both these watercourses go on under the A46 and can cause serious flooding in Warden Hill and beyond.

6) STOP ANY MORE BUILDING ON THAT SIDE OF THE A46 AND PUT THE LAND BACK TO PRODUCTIVE FOOD AND ENVIRONMENTAL USE. PLANT SOME TREES - THAT WOULD SOAK UP THE EXCESS WATER.

This area would make an excellent green Lung & Space with copses of trees and open areas for the well being of the whole community.

Comments: 1st March 2021

I am looking at the P.Cl. map of the new housing applications in the area along the A46.
> Miller Homes application is huge, it takes most of the fields alongside the A46. back as far as Kidnappers Lane, along with other building applications in the area.

> A46 is almost impassable now, all those extra houses along with the new school traffic -

> it will be chaos, adding to all the traffic coming down Farm Lane from all those new houses.

> WE ARE BEING ASKED TO PLANT TREES to help save the planet, those combined developments will decimate the trees and green spaces in the area.

> This area would make an excellent GREEN LUNG and community amenity for the area and residents from further afield.

> If planned with that in mind, as a project on London's Queen Elizabeth Olympic Park, and 'Trees for tomorrow' featured in the Nat Trust Spring 2021 magazine.

> Pgs 26 - 29.

Comments: 1st March 2021

instead of bulding on green land Planning should insist on using brown land and unused spaces in the town and other built up areas being used first.

15 Wells Close
Hatherley
Cheltenham
Gloucestershire
GL51 3BX

Comments: 11th December 2020

I am very concerned about this planning proposal, especially where the Foul water from Miller Homes Phase 2 will be directed to.

In Warden Hill in June 2020 several areas of Warden Hill experienced flooding following torrential rain that caused surface water drains and local sewers to fail, breaching manholes and damaging a number of properties.

Warden Hill's existing sewer system is over 60 years old and has previously failed in July 2007, June 2016 and June 2020 due to intense torrential rainfall events. In April/May 2020 Tewkesbury Planning Authority granted Redrow Development permission to direct foul water into the existing Warden Hill Sewer system. Although Severn Trent Water (STW) was aware of the previous sewer failures they still approved the Redrow application.

Grateful if Cheltenham Planning could clarify where the foul water will be directed to as it could have significant repercussions for our estate. Warden Hill sewer / surface water drains already struggle to cope with excessive rainfall events. Miller Homes modelling of the systems being designed to cope with 1:100 or 1:1000 storm events is wholly inaccurate as severe rainfall events now impact on the UK every 3 -7 years.

Miller Homes have now applied to erect 370 houses on this new development, in two separate Phases.

(1) Phase 1's sewer water is shown as running NE along the Shurdington Road, whereas (2) Phase 2 appears unspecified. From the plan it would appear that this may eventually flow into the Warden Hill via the Shurdington Rd? If the latter is true, then we have real concern with this proposal.

Although STW undertook repairs to the Salisbury Ave sewer it again failed to cope with the intense rainfall in June 2020 so the problem remains unresolved. STW also undertook restorative work to a water ditch in Farmfield Rd (in 2017/2018), but the remedial work undertaken to date does not seem to have improved the situation.

There is a real need to keep investing in our older pre-existing estates and ensure repair / replace of failing surface and sub-surface water networks.

I would be grateful if you could include my concerns in your report when you respond to the Miller Homes Development application, which I believe is due to come back before the County Planning Team in the near future.

45 Campion Park
Up Hatherley
Cheltenham
Gloucestershire
GL51 3WA

Comments: 15th December 2020

The proposal is fundamentally flawed and irresponsible. my points are as follows:

The roads cannot cope, the A46 is already heavily congested at peak times and during the day which will get even worse with the new school. There will be no new main roads, all of the access roads will join the A46 Shurdington road increasing congestion. Buses and emergency vehicles will be delayed by even more traffic. This is dangerous.

Pollution levels will increase as a result of additional traffic.

There will be no additional Doctors Surgeries which are already heavily loaded.

Few, if any, of the houses will be affordable or for rent at reasonable prices. This is simply a development for well off people who want to get into the new school. Rich people will buy second homes to facilitate getting into the new school. It will become a magnet for second homes and buy to let and yet another executive homes site.

The area at Warden Hill is susceptible to flooding. The existing flood defences will struggle to cope with the water run off and will put existing housing and the main A46 road at risk of flood damage.

18 Brizen Lane
Cheltenham
Gloucestershire
GL53 0NG

Comments: 28th January 2022

We cannot possibly see how the A46 Shurdington Road can take any more traffic over and above the amount there is right now, especially at peak hours.

The reason why we state this is because luckily it isn't very often that we travel out of Cheltenham along the A46 towards the A417 junction at around 8:15 am on a non-holiday weekday morning, it being very recently on Tuesday 25th January 2022. Without exaggeration, the queue going into Cheltenham without any accidents/incidents was all the way back to the A46/A417 junction, waiting to enter the A46, and queuing for around half a mile along the A417 towards the M5 junction. We are sure that it won't be very long until traffic is queuing and waiting to get off the M5 to get on to the A417 and then along the A46 on this southern entrance into Cheltenham....it may be already happening on some mornings, we don't know. We are sure that the same traffic queues must be the same leaving Cheltenham, again especially at peak times. The above is combined with traffic coming from the Brockworth and Air Balloon directions and mixing with the traffic from the A417 at this roundabout where there is a terrible blockage.

Please try it yourself some weekday mornings, which are NOT during any holiday periods, and you should witness what we did on a purely random morning. This CANNOT be allowed to carry on given that there are many developments in the pipeline all along the A46.

Forgive us, but in case you are not aware, the following developments right near to the A46 from Brockworth to Cheltenham are all being planned, and built, without consideration for any road infrastructure to support them:

350 Miller Homes + 12 Kendrick Homes + 26 Newland Homes are all proposed right next to, and near to, the A46 at Leckhampton, also a further 30 Redrow Homes at the junction of Farm Lane/Church Road which are extra to Redrow's 377 already being built. Additionally, 1,500 dwellings being built at Perrybrook, next to the A46 and very near to Brockworth, and 180+ proposed dwellings at Shurdington in the TBC Local Plan. This is a total of at least 2,470(ish) so far which means an estimate of at least 4,000 extra cars (maybe more) using the narrow A46 entrance to Cheltenham through Shurdington and rat-running other roads in the Leckhampton/Shurdington/Warden Hill areas, especially at peak times as we have stated.

These are all without taking into consideration the new LECKHAMPTON HIGH SCHOOL that will be up and running in September 2022, with all the extra traffic that it will also bring.

Please will you consider the points we have raised with urgency. Life cannot carry on in its present state because these developments will cause additional major tailbacks in and out of Cheltenham if/when they are given the 'green light'. Surely in your heart of hearts you must know that the traffic will be gridlock at peak times and awful at other times. You obviously have Government guidelines to follow but surely you also have the power to stop many of the developments that have been mentioned on the grounds of overdevelopment, with no infrastructure in place, giving treacherous traffic conditions.

A sobering thought: If a new roundabout is to be built at one of the Miller Homes entrances, as proposed, then there will be terrible queues on the A46 for many weeks/months to come....how will those endless queues be explained to the public ?

Comments: 27th January 2021

It should be noted that some of the Consultee's comments to this application are quite damning, most notably from the Architects Panel, Cheltenham Civic Society, Vision 21 (see below), Tree Officer and the Ramblers Association.

Others, such as the GCC Highways Planning Liaison Officer, appear very concerned and have asked for a deferment of the application. Therefore shouldn't there be alarm bells ringing about the many pitfalls of this development, especially with a view to the sheer volume of extra traffic on this critical entrance to Cheltenham that will greatly affect the lives of so many residents on either side of the A46 in both Warden Hill and Leckhampton, and other surrounding areas ? Not only is the traffic a major concern but there are many other issues, as pointed out in the Consultees and Public comments, such as poorly designed housing and frontages, with some 3-storey dwellings, lack of modern gas boilers, lack of carbon zero neutral homes, flooding worries downstream in Warden Hill, air pollution concerns, ecological concerns, poor landscape value....the list goes on !

On the subject of gas boilers etc; it is worth reading the Guardian article in the following link:

<https://www.theguardian.com/environment/2021/jan/23/buyers-of-brand-new-homes-face-20000-bill-to-make-them-greener>

Also, a recent Daily Telegraph article stated "Act now ! Install a zero-carbon, energy efficient boiler and replace your bulky and inefficient gas or oil boiler. With the domestic market moving away from gas installations and the UK Government banning the installation of gas boilers in all new homes by 2025, homeowners should be looking for alternative ways to heat their properties" The question has to be, why are Miller Homes not producing plans to build their homes with zero-carbon, energy efficient boilers installed ?

Additionally, there are recent strong objections from the Friends of Bournside (19th Jan in Documents Tab) with disturbing comments and huge concerns about flooding downstream of Warden Hill and showing alarming photos of recent bad flooding in the area where they live. Also, Up Hatherley Parish Council and Brockworth Parish Council have voiced big concerns in their very recent responses, especially about traffic.

All these comments by prominent organisations should be taken note of by Miller Homes, CBC Planning Officers and the Planning Committee.

Finally, flooding has hugely affected Warden Hill roads in past years, and now there being big concerns about it again if this development were to go ahead. Leckhampton with Warden Hill Parish Council campaigned vigorously in the past for something to be done in areas of Warden Hill that were badly flooded (notably David French Court and the Farmfield Road area), that is why £600,000 was spent on flood defences to the side of the A46 and to the west of Kidnappers Lane.

NB:

The following excellent extract is from Vision 21 in response to the Miller Homes application:

"This sounds good but the statement lacks ambition and is nothing more than a grouping of weasel words. This is evident by the fact that there isn't any commitment to install electric vehicle charging points as standard. There is no mention of installing any micro-generation technology (solar panels or heat exchangers for example), nor any mention of installing any district heat and power system. They are planning to install gas boilers to heat the homes.

This latter point is particularly galling, since in its Spring Statement the Government has announced that by 2025, all new homes will be banned from installing gas boilers and will instead be heated by low-carbon alternatives. The ban is inspired by an attempt to reduce Britain's carbon emissions and follows recommendations from the Committee on Climate Change in their recently published report "UK housing: Fit for the future?" that fossil fuel heating be replaced with renewable alternatives such as heat pumps.

This development needs to be a demonstration of how Cheltenham intends to develop a carbon neutral future, which means the scheme, as presently put forward, must be

rejected and replaced with a new proposal that lives up to Cheltenham Boroughs' aspirations in which:

All homes should be insulated to a standard that allows for them to be heated by heat exchange

Heat exchangers (air, ground or water) should be installed in all of them (some use of water may be possible given the creation of several water bodies in the scheme)

Solar panels should be installed on all south facing roofs

Electric vehicle charging points should be installed on every home"

Comments: 15th January 2021

The reasons for our objections are much the same as many other excellent objections about the traffic implications, infrastructure, air pollution, flooding, landscape value, ecology, etc; with a few additions.

TRAFFIC AND INFRASTRUCTURE: You have to believe us when we state that most people we know living in the Leckhampton area, and its surrounds, don't understand how the infrastructure will cope on one of the major routes into Cheltenham (the A46) and also on the surrounding lanes and roads i.e. Farm Lane, Kidnappers Lane, Leckhampton Lane and Church Road, in addition to other areas nearby. Additionally, please be aware that Kidnappers Lane, Farm Lane, Leckhampton Lane and Church Road are all narrow, rural, country lanes and roads.

We all know how bad it is at the moment, particularly at peak times, and can guarantee that it will only get very much worse when the 377 houses on the Redrow site, Leckhampton are built, 26 Hitchins homes off Kidnappers Lane, Leckhampton, 42 further Redrow homes (applied for this week, if built) at the junction of Farm Lane/Church Road, the 1,500 dwellings at Brockworth being built, 180+ proposed dwellings at Shurdington in the TBC Local Plan, and now the proposed Miller 350 dwellings on the Leckhampton fields. This is a total of at least 2,450(ish) so far which means an estimate of at least 4,000 extra cars (maybe more) using the A46 and other roads in the Leckhampton/Shurdington/Warden Hill areas, especially at peak times as we have stated.

All these extra houses, plus the proposed new school on the nearby fields, has got to make the traffic in the area approaching GRIDLOCK at times. As we have witnessed a few times, traffic going into Cheltenham in the mornings can be 'backed up' to, and even beyond, Shurdington towards the A417/A46 junction....and that is without any accidents in the surrounding area and/or on the M5. All these proposed developments, with all the extra traffic, is probably the reason why there is a present submission to CBC by Gloucestershire Highways which states, "The Highway Authority and the Applicant are discussing this application.....whilst these discussions continue with the Highway Authority it is asked that this application is not determined. The Highway Authority therefore submits a response of deferral."

The point here is that the consideration of this Miller Homes application for 350 homes, next to an extremely busy A46, should surely not be considered until Gloucestershire Highways has come up with a comprehensive solution to the traffic problems in this area (it was 200 homes previously, which we thought was 200 too many !). There is no evidence at the moment that any planning (or even thought) has started on the

necessary infrastructure, including provision for footpaths and cycleways for the proposed school, let alone a major 350 homes estate with all its infrastructure problems.

We, and so many others around the area where the proposed school is to be sited, find it very difficult to believe that a solution will ever be found for the transport infrastructure in order to mitigate the traffic impact because the roads are just about passable now without the addition of any bus lanes, cycle lanes and footpaths etc; Gloucestershire Highways are not listening to the residents and the local Leckhampton with Warden Hill Parish Council (LwWH PC), who know the area light years more than any Planner does.

We are sorry to say, but it is true, that no matter how many times developers come out with all these 'flowery' words and phrases about cycle lanes, bus lanes and footpaths being installed (in order to satisfy the planners) we just don't believe that they can be, or will be, on the very narrow Church Road, Leckhampton Lane, Farm Lane, Kidnappers Lane and A46 Shurdington Road. All of them are just about wide enough to fit a car each way.

Very importantly, we all know that a huge number of parents, in today's world, do the 'school run' and will drop their children off alongside the A46 Shurdington Road going into Cheltenham in the morning at peak time to get to the new school on time. Those children will, without doubt, frequently rush across the Shurdington Road, probably looking at their devices at the same time, only to be involved in a bad accident with a vehicle travelling the other way. It is a bad accident waiting to happen (maybe a death). How will Highways, Miller Homes and GCC feel then ? Will they take responsibility for their actions in allowing this development to be built ?

The three local Parish Councils namely Leckhampton with Warden Hill Parish Council, Shurdington Parish Council and Up Hatherley Parish Council have all strongly objected to previous proposed developments in the area, including the new proposed school, on all the grounds of traffic implications, infrastructure, air pollution, flooding, landscape impact, ecological issues etc; let alone the very narrow and dangerous country lanes. They have got to be the ones to listen to because they have the local day-to-day knowledge, as we do living in the area.

AIR POLLUTION: An article in last March's Planning Resource magazine stated that Cheltenham is listed as one of the 33 authorities ordered to take action on air quality. As you can imagine this is of huge importance when deciding where to site a new development i.e. next to the extremely busy A46 Shurdington Road and next to a school, air pollution being a major factor which affect young people's lungs.

FOOTPATHS: Since lockdown more people than ever are using, and have used, the Leckhampton footpaths for their recreation. On our exercise sessions we have regularly passed them using the footpaths that will be used for the proposed housing application. Many of the people we have spoken to are saddened by the terrible decision of this proposed permanent closure for a housing development.

GREEN ISSUES: We thought that Cheltenham Borough Council had recently shown itself to be a very green council in the fight against climate change. This means huge reductions to carbon zero on any new build.

LANDSCAPE VALUE: This area is famed for its Landscape Value which was absolutely reinforced by the JCS Inspector, Elizabeth Ord. This proposed development would 'stick out like a sore thumb' from the escarpment on Leckhampton Hill.

FLOODING: We know that it has been mentioned by a few other objectors, but please be aware that bad flooding has occurred from the Hatherley Brook during times of heavy rainfall....this will have to be strongly mitigated against. We can supply photos of flooding here if you are interested.

ECOLOGY: There will be a very negative impact on habitat and ecology and others have also commented on this point.

CBC Officers will be making a huge decision that will affect the lives of everybody in Leckhampton, and surrounds, for generations to come. We beg you to think hard and deep on the decisions you take. If the officer's recommendation was to permit then it will be despite the very many concerns from the community at large on the need for this development.

Lastly, but again very importantly, it is imperative that a site visit is undertaken by Cheltenham Borough Officers and Councillors for such a huge and important proposed development such as this, in order to physically observe it both on the site and at a high distance on the escarpment of Leckhampton Hill being in the AONB. The impact on the landscape will be huge, especially with the proposed 3 storey dwellings, matching the "eyesore" of the new red-coloured Redrow estate from the AONB,

PS A VERY ASTUTE NEIGHBOUR HAS RECENTLY CONTACTED US STATING THE FOLLOWING:

First pictures from the Gloucestershire Echo Live....a few trees on one side of the road, a rather pathetic gesture. No hedges or front gardens and nowhere for any flower beds. Very uninteresting streetscape. Cladding only gets discoloured over time (see The Berkeley Homes development, Century Court on Bath Rd and Middleton House on Pilley Lane). Bulk-buy monotonous shrubs in each front garden.

Where is the infrastructure for this development? More houses, yet not a shop, pharmacy, cafe, doctor's surgery or any other facility as part of the mix. Why not?

A development such as this, on top of the other 377 Redrow houses, with no facilities either, just makes for more traffic on local roads when you want a loaf of bread or some milk. Parking on, and around, the Bath Road is near impossible now and will only get worse for shopping once these extra houses are built.

More red brick houses. Where are the Cotswold stone and stone houses so redolent of Cheltenham and the Cotswolds? Another development that could be put in any other part of the country and not look out of place. I thought we were past the 'poor design' stage of development from the big builders and that we could look forward to something more unique where we live ?

Comments: 30th September 2021

1st comment submitted on Wed 27 Jan 2021.

We have taken a look at some of the supposed changes in the Miller Homes application and can find nothing they have altered that stands out....much of the application remains the same. Our first objection was published on 27th Jan 2021 and still stands, however we have highlighted a few recent comments/objections which state everything that we have highlighted, and more. These aren't the only ones but there are many other recent excellent comments/objections also.

These are a few of the recent comments/objections by others:

"I have serious concerns to this development for several reasons:

Because of the large number of houses and the impact this will have on the local area in terms of additional traffic, pollution, increased risk of flooding, damage to the environment, wildlife and the increased urbanisation of this area of Leckhampton.

Traffic levels along the Shurdington Road, Farm Lane, Kldnappers Lane, Church Road are already extremely busy - particularly in the mornings and evenings during the 'school run' and commuting to work times. The current infrastructure is already struggling with the level of traffic. The new school that is being built will bring many more cars onto the roads.

Noise and pollution levels will inevitably increase with more vehicles, when we need to lower pollution to improve air quality. The increase in traffic would further impact on people's health - particularly children's health.

This proposed development would also increase the risk of flooding - you only need to look at some of the photos submitted by local people to see the flooding that has already occurred in recent years.

I really hope that this planning application by Miller Homes is refused for the reasons I have already mentioned."

ALSO,

"We sent in the comments below relating to the above application after the closing date for comments earlier this year. I note our thoughts are not published on the list of responses to the planning application online. Please could you confirm that they will be taken into consideration when reviewing the application by Miller Homes? We are still, like many local residents, extremely concerned about the impact the new development could have on flooding risk to local homes. I can't see any reference made to this concern in the revised documents. Please could you point me towards any further work done on this, in case I have missed it?

Having read the cover letter supplied by the development company accompanying the resubmission I can see nothing that in any way addresses my objections to this development on the grounds of pollution, scale, impact on traffic, developing a greenfield site etc; and continue to strongly object to it.

This morning at 8.15am there was a solid line of traffic along the entirety of the Shurdington Road and backing onto the A417 slip road. I do not understand how building a further 350 homes on a greenfield site in this area, before the school has even opened, can be considered acceptable?"

AND,

"This revised application shows little change regarding zero energy housing. This goes against Cheltenham Borough Council's declaration of a Climate Emergency. The definition of emergency is 'a serious situation requiring immediate action', therefore all new housing should be built to this spec.

The housing density is too great, the infrastructure already cracking at the seams, and loss of green space will take away the character of Leckhampton."

20 Allenfield Road
Cheltenham
Gloucestershire
GL53 0LY

Comments: 28th December 2020

I strongly object to the nature, scale and impact of this development.

Traffic congestion is already a significant concern in the area: this will be worsened by the new secondary school and also as the changes to Leckhampton Primary school. The Shurdington Road is one of the main routes into Cheltenham, over the past 5 years an increase has already been seen in the volume of traffic with the Redrow housing development on Farm Lane, the increase in pupil numbers at Leckhampton Primary school (which will further increase as the three-form entry extends to all year groups).

Other comments have remarked that the UK's slow transition to electric vehicles may reduce some pollutants and so negates this argument, but this does not reduce the numbers of vehicles on the roads and the problems these cause.

Considering that the majority of households now have 2 cars, the development is introducing over 600 cars into the area. Whilst developers have highlighted that cycle paths will be introduced, this development is not particularly close to any amenities. Living in this area it is clear that people only use bicycles or walk to take very short journeys. For the majority of travel to schools, work, the shops etc, they drive. The existing roads outside of this development are unsafe to cycle on, additional cars will make this worse.

The area proposed for development include green spaces well used by local people. Small holdings have also historically been on the land proposed for development. Plans show that 17 small allotment plots have been suggested to replace this for 350 properties, which seems utterly inadequate and tokenistic on the behalf of the developers. The magnitude and nature of this development also concerns me with regards to wildlife, and particularly the detrimental effect that the removal of hedgerows, and 'overgrown' green spaces will have on wildlife. I notice that hedgehogs, another

endangered species, but currently with populations living in the area, do not appear to have been included in the surveys. Further traffic, will further impact on all of these populations. Further more, reducing the amount of greenspace available, puts additional pressure on the green space that remains with increasing numbers of people and dogs accessing a smaller and smaller area, and further damaging the local ecology.

Finally, I am really angered at the lack of public consultancy that has occurred around this project. This development is occurring on the doorstep of lots of people and will significantly impact on many people's experience of living in the area; the green space that they are able to access, levels of pollution (cars, noise, light etc), congestion, and the safety of the local roads. It will have an impact on the local wildlife. And yet, I was unaware of any attempt by the developer to inform, consult or engage with the local area. It was by chance that I found out about the proposed plans. Regardless of whether or not the decision is taken that the development can go ahead, I think that this behaviour on the behalf of the developers is very wrong.

My understanding from previous applications to develop the area with just over 600 homes was rejected as this was viewed as too many new homes for the existing area to accommodate without a significant negative impact. Since then the Redrow development was contentiously given permission. Looking across the two sites, this seems to be an attempt to get a similar number of new homes in the same area, just spread across two sites. Surely this argument stands, that the local area cannot accommodate this number of new homes?

I appreciate that there is a need for affordable housing in Cheltenham. I question whether this housing proposed will actually find its way into 'affordable homes', as I suspect (as with the Redrow development) that this will become sought after and expensive housing owing to the location and local schools etc. However, it is the size and intensity of the development on a greenfield site that concerns me. I do not think that it is an acceptable scheme for the land it is planned for and I strongly object to it.

Comments: 27th September 2021

Having read the cover letter supplied by the development company accompanying the resubmission I can see nothing that in any way addresses my objections to this development on the grounds of pollution, scale, impact on traffic, developing a greenfield site and continue to strongly object to it.

This morning at 8.15am there was a solid line of traffic along the entirety of the Shurdington Road and backing onto the A417 slip road. I do not understand how building a further 350 homes on a greenfield site in this area, before the school has even opened, can be considered acceptable?

42 Fernleigh Crescent
Cheltenham
GL51 3QL

Comments: 17th January 2021

I would concur with the comment from GCC highways that this application should be deferred pending conclusion of the discussions between the applicant and GCC Highways.

Up Hatherley Parish Council
Woodbines Cottage
Sunnyfield Lane
Cheltenham
Gloucestershire
GL51 6JB

Comments: 17th January 2021

I am responding to the application on behalf of Up Hatherley Parish Council.

Our Parish is located in the SW of Cheltenham and whilst the proposed new housing lies within a neighbouring Parish the impact on the infrastructure and the landscape are of direct relevance to us.

At the time of the JCS/ local plan 5 years ago we expressed great concern about the impact of development in this area particularly on the road infrastructure and specifically on the already highly pressured arteries going into Cheltenham namely the Shurdington Road (A46) and Church Road. The situation since then as some development has progressed and traffic volumes generally have grown has only worsened and we would concur with GCC Highways that this application must be deferred until mitigation matters for this acute problem are considered and enacted.

We would also ask that Inspector Ord's proposal that in order to preserve an appropriate landscape in the area the development of areas R1 and R2 should not be allowed and thus this element of the Miller Homes proposal is rejected.

80 Bournside Road
Cheltenham
Gloucestershire
GL51 3AH

Comments: 29th January 2021
Letter Attached.

180B Leckhampton Road
Cheltenham
Gloucestershire
GL53 0AE

Comments: 6th January 2021

It appears as though the strategic plan for this area is being delivered in a piecemeal manner, over-riding previous objections. And of note, no longer provides safeguards, planning or consideration for the constraints and challenges of this area.

Traffic, Flooding, environment, aesthetics, health, education etc are all being pushed to the limit.

Whilst I have not yet read all 230 documents, I have established that the traffic figures are unrealistic, of 882 parking spaces, only 200 vehicles are going to exit/return via Shurdington Rs. Clearly false.

The flooding information does not reflect the true current local situation, fields and paths are flooded frequently as known by CBC data.

The high density of housing, and small footprint will provide challenges for family life especially given future home working needs.

This plan should be thrown out, it's unrealistic for this area. And will cause significant disruption for those of us that have lived here for 30 years and raised families.

Rowantree
31 Farmfield Road
Cheltenham
Gloucestershire
GL51 3RD

Comments: 14th January 2021

Air and noise pollution, increased traffic, depletion of green space

Comments: 13th September 2021

Busy roads, less green space, pollution.

5 Nourse Close
Cheltenham
Gloucestershire
GL53 0NQ

Comments: 15th January 2021

I object to this application :-

- 1) There are sufficient Brownfield Sites within the Cheltenham Town to fulfil all new housing needs.
- 2) The only access from this site is onto the already 'nose to tail' traffic on the A46 Shurdington Rd and the volume is increasing due to the Brizen View estate that is being built.
- 3) There will be even more traffic when the new Leckhampton School on Farm Lane is operational.
- 4) The quality of life and our surroundings for those of us that live within this area has already been hugely impacted by volume of traffic from new residents & building contractors from Brizen View and the new school. This area did have a rural feel which dwindling fast, please don't take what is left of it.

Green acres, Crippetts Lane
Leckhampton
CHELTENHAM
GL51 4XT

Comments: 24th November 2020

This application for yet another large development in this general area, which was until recently a "green lung" for the Southern half of Cheltenham Should be rejected. It is not needed, and If permitted, this proposed development would not only damage the local environment, but also lead to even greater congestion and air pollution on the A46 (Shurdington Road). This road would be (by far) the main access route to the estate for motor traffic.

Already the traffic on the A46 is excessive and causes considerable air pollution at busy times; and when the nearby REDROW estate is completed in a year or two, and in addition the large new Leckhampton High School is functioning in 2022, the traffic noise and air pollution will be horrendous unless drastic steps are taken to discourage motorists from using this route. The best way to do this would be for the Government to introduce a "Road Use" tax, to replace fuel duty. If this tax was sufficiently high, it would encourage people to reduce their motoring mileage by using alternative means of getting around - e.g. walking, cycling, using public transport or car-sharing, or by travelling less. But until some measure of this sort is in force no further development along this overcrowded highway should be permitted. (A congestion charge for using this road - and other overused roads in Cheltenham - is a possible alternative, but might be difficult to introduce.) In the absence of some such scheme, this new proposed development should NOT be permitted.

Also, the development's proposed architecture is inappropriate for a situation that is immediately adjacent to the Local Green Space in the Leckhampton fields. A more rural and less uniform appearance of the houses would be more in keeping with the location; and certainly there should be no three-storey buildings. (The nearby REDROW estate is a good example of what NOT to do!)

Comments: 18th January 2021

Further to my previous objection, I have now read the objection submitted by Leckhampton with Warden Hill Parish Council, and I wish to fully support their objection with which I entirely agree.

The Littlecroft
Shurdington Road
Cheltenham
Gloucestershire
GL53 0NJ

Comments: 14th January 2021

I am writing to object to the above planning application to build on Shurdington Road Leckhampton in Cheltenham.

I believe the proposal is fundamentally wrong and should be refused for the following reasons:

This application will overload an already burdened local infrastructure, transport in and around the Shurdington road is already chaotic and most mornings at a stand still. No consideration has been made about the impact on the environment and on air pollution.

The new school development is already going to increase traffic congestion to unprecedented levels and consideration must be given to the detrimental effect this will have on local residents.

now that the High street is in terminal decline emphasis should be put on the redevelopment of our town centre, not on gobbling up green belt that is a local community asset.

The development falls within the green belt and our local plan is supposed to protect this. 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, views of Leckhampton Hill - and the chance to relax away from the stress of everyday living, which in turn, keeps people fit and happy.

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 last four previous inspectors recommended that large scale development in the Leckhampton area be rejected and that the rural character should be protected.

It appears to me that following the initial rejection of plans to build 1150 houses that the developers have decided to break planning applications into small packages and get them through piece meal.

We now already have the 450 houses being built adjacent to the proposed site and the impact of these are already being felt by local residents with additional delays and air pollution.

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 and Kidnappers Lane.

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.

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.

42 Pilley Crescent
Cheltenham
Gloucestershire
GL53 9ET

Comments: 14th January 2021

I object strongly to Miller Homes Planning Application to build 350 homes at Shurdington Road, Leckhampton. This would impact greatly on the environment and surrounding area. The sole purpose of building the new Leckhampton High School was to ease the pressure on the existing Secondary School, NOT for extra places to then be required by the occupants of the proposed new builds.

35 Hawkswood Road
Cheltenham
Gloucestershire
GL51 3DT

Comments: 14th January 2021

Our environment and heritage is now under siege by profiteering construction companies who have settled around the town building 'wendy houses' with little forethought.

The A46 and Church Road are gridlocked in the morning and you risk your life if you try and cross them. I remember when I used to run out to Brockworth several years ago and regular as clockwork the traffic would be backed up from Moorend Road lights to the Greenway crossroads and sometime actually out to the A417 bridge.

The roundabout what a laugh, the area is already a pollution blackspot, you really need to be focusing on reducing the environmental impact when you build, not same old same old. If this planning application is permitted, it is likely to add an additional 700 or so cars to go along with these new houses, which doesn't include the school's traffic as well. You need to rethink this. Church Road is extremely busy in the morning, I guess you could have all the residents move their cars off the road, but I suppose if you did that they would probably be not very happy. Reason being as I said, that road is a horror!

350 houses, assuming 2 cars per house would create an additional 700 cars on already very heavily congested roads. In my view, the associated pollution adds up to bad news for the locals and those new to the area.

It is without doubt a failure on behalf of the council and local councillors if they cannot see that this area is part of the beauty of the intricate environment which is the Cotswold escarpment. We talk about environmental destruction in other parts of the world and vilify those responsible, yet here we are doing the same but dressing it up to make it acceptable to rob our children`s children of these green and special places.

So what are we going to do with all the pollution belching from those stationary cars as they chug up past Warden Hill and Church Lane? I suggest if you are a councillor you will need to either canvas harder next time we have elections or find yourself another job. Remember you should be representing our interests, the local people.

71 St Michaels Road
Cheltenham
Gloucestershire
GL51 3RP

Comments: 13th January 2021

Objection to this development on the following grounds:

- Warden Hill has been flooded several times in recent years and building over these fields can only make this worse.

- The A46 is already completely backed up with traffic in rush hour and pollution is already an issue. It does not have the capacity for traffic from the new school and the Redrow development, let alone another 350 homes.

In conclusion, the existing infrastructure issues for existing residents need to be solved before any more houses can be allowed to be built.

15 Peregrine Road
Cheltenham
Gloucestershire
GL53 0LN

Comments: 14th January 2021

As I live with my wife near the proposed development of 350 houses, I feel strongly about this application. This will cause so many problems affecting the countryside, the amount of traffic on Shurdington Road which is so often gridlocked now mornings and evenings, flooding to the land surrounding affecting local amenities & pollution. As the Burroughs Playing Fields are at the back of our house & Leckhampton Rovers Football Club have had some money donated to stop the field from flooding which it does every year, this tells you the problem is here already and will only increase with your proposed buildings. I feel local peoples opinions should be considered in this case and taken seriously.

33 Collum End Rise
Leckhampton
Cheltenham
Gloucestershire
GL53 0PA

Comments: 14th January 2021

I object to this proposal because of:

- 1 The effect on the landscape and character of the area.
- 2 The effect on the ecology of both the immediately surrounding area and the nearby AONB.
- 3 The effect on local traffic which already causes difficulties for local residents and is certain to be made worse by the recent expansion to Leckhampton Primary School and the new school being built on Kidnapper's Lane.

Visitors to Leckhampton always comment on the loveliness of the area. We need to recognise the value of this asset and protect it before yet more is lost to new development.

Leckhampton Rovers Football
Club

Comments: 20th November 2020

I am writing on behalf of Leckhampton Rovers Football Club (LRFC) regarding the above planning application. We are the second biggest club in Gloucestershire, run over 30 teams and have around 600 members, mainly children. The majority of our players live around Leckhampton. We will be the nearest sport club to the development and are in the process of securing the Burrows Playing Fields as our home ground.

LRFC is just about to start a plan to develop the Burrows Playing Fields and pavilion in Moorend Grove, Leckhampton. This is a joint project with Cheltenham Borough Council. It will involve completely levelling the playing fields and refitting the pavilion. It will offer a fantastic sporting facility and community hub for the residents of Leckhampton and beyond. The project is costing around £850k and the majority of the money has been raised. It is starting in May 2021. The project has huge community support including the local MP, Parish Council, Cheltenham Borough Council, FA, ECB, LTA and over 130 formal letters of support.

The Burrows is the nearest green space to the Miller Homes development and is used by a wide range of people. The facilities include football, cricket, BMX track, playground and general recreational space for exercise. It is extremely popular. We are working hard to improve the infrastructure of the area and this will include cycle stands added and a circular footpath to encourage people to walk/cycle to the site. Parking is tight and can be an issue so these are really important for the local residents.

The current access points to the Burrows are predominantly from Moorend Grove and Church Road. These are supported by footpaths/road access. However, the current plans for the housing development appear to offer no improvement to other access points.

There is a new secondary school being built, Leckhampton Primary School is undergoing a significant expansion, around 350 Redrow houses have been built and now this development. It is surprising therefore that all of these have not been linked to the Burrows via footpath/cycle paths. The Burrows will support all of these for outdoor exercise and needs to have much better access from all sides.

We are a sport community partner of Leckhampton Primary School and are going to be the same for the new secondary school. This links all of us together to support the physical wellbeing of these communities. We want people, especially children to be able to move between these sites easily and safely.

Please can you reconsider the infrastructure supporting the new development and prioritise better footpath/cycle path linkage from all sides of the Burrows. We would like to see better paths linking in via Kidnappers Lane and Merlin Way especially. They could easily link directly onto the circular path at the Burrows.

If you wish to discuss this further then please contact me on the details below.

2 Arthur Bliss Gardens
Cheltenham
Gloucestershire
GL50 2LN

Comments: 30th November 2020

There has been quite enough development already in the designated area. The land is a precious green lung giving access by public footpath to Burrows Field and the adjoining meadow. Another 350 dwellings will affect the following.

1. The Shurdington Road. At rush hours the traffic banks up already to the A417 roundabout. the pavement alongside is narrow and dangerous.
2. Burrows Field and the adjoining meadow are a precious green lung and will now be overused and turned into a mudbath.
3. The following wildlife use it: Deer, hedgehogs, bats, badgers.
4. A new school is planned but what about GP Services (existing ones cannot cope at the moment) Community centre, pub, local shops?
5. Hatherley Brook will see increased run off as the land is lost. There will be flooding.
6. another ecological disaster which we strongly object to. I also note that the publicity of this project has been minimised. Only one notice on the footpaths leading to Burrows.

34 Pilley Lane
Cheltenham
Gloucestershire
GL53 9ER

Comments: 6th January 2021

I have great reservations about the building of more houses in the area following the recent Redrow development. The speed of change being inflicted upon the local area is frightening.

With the new school also being built I have great concerns about the impact of pollution, noise and the lack of infrastructure to support hundreds more vehicles. The proposed area for the development does not have highways suitable to support hundreds more vehicles. Given the regular congestion and level of traffic already on the Shurdington Road, I fail to see how the roads will cope with hundreds more vehicles.

Additionally, the environmental impact of yet more building will be vast. Are there no brown field sites that would allow for the building of homes without such a large environmental impact?

10 Lambert Gardens
Shurdington
Cheltenham
GL51 4SW

Comments: 14th January 2021

It has been brought to our attention the application for the building of the 350 homes. At first this did not appear to cause us too many concerns as we are located in Shurdington village, however upon reflection the road and transport issues are really going to cause so many problems for anyone living along Shurdington Road and in the immediate area.

Although classed as Tewkesbury Borough (why I will never understand) all our needs with reference to shopping , medical dental etc are based in Cheltenham. I volunteer at

Cheltenham General hospital and when I have a shift start for 8.00 am I currently leave the village no later than 7.30 am to get in on time. With the increased traffic this will substantially increase my travelling time whilst I sit in queues of traffic.

Also in relation to medical appointments you have a set time are we going to have to allow 45 mins travel time instead of 20-25 at the moment. All these issues are going to enhance stress levels, impatient drivers etc.

There is also the flooding issue, Shurdington Road at times of heavy rain is almost always flooded from the run off from Leckhampton Hill. Adding more concrete to the ground means that the water has to find other ways off the hill and the proposals stated will not alleviate any of the concerns.

Whilst I appreciate that homes are required why is the council not looking at sites within Cheltenham Borough that are currently in need of repair, demolition or upgrading.

12A Moorend Street
Cheltenham
Gloucestershire
GL53 0EG

Comments: 14th January 2021

This development is excessive in the number of houses and the impact that it will have on traffic, air quality, public recreation and local services. There have already been substantial numbers of new houses built in this area, both estates and filling spaces in built up areas

37 Moorend Road
Cheltenham
Gloucestershire
GL53 0ER

Comments: 18th January 2021

KEEP RESTRICTED - DOES NOT WANT ADDRESS MADE PUBLIC

I would like to add my concerns regarding the planning application for 350 homes on Shurdington Road.

Although I appreciate the need for the building of new homes, I do not feel that the location for so many more new houses is appropriate because amongst other things:

- the traffic on the Shurdington Road is already excessive and will already increase with the building of the new school, this is both a pollution and environmental issue, another 350 homes-worth of cars will only add to this;

- the habitats and natural environment of the current area will be destroyed for local wildlife;

- the floodplain element of this area has already become an issue and could affect both the new homes and existing homes on both sides of Shurdington Road;

- the current footpaths appreciated by local residents, will be reduced and the remaining ones become even busier;

I could go on, but my major concern is the increased traffic and pollution, especially close to a road which is already a nightmare, particularly during rush hour, when the traffic is a constant flow both ways, with plenty of standing traffic pumping out fumes, as children walk past on their way to local schools.

I hope you will understand my concerns.

Flat 3
Leckhampton Farm House,
Leckhampton Farm Court,
Cheltenham,
GL51 3GS.

Comments: 18th January 2021

I am writing to you with serious concern about the proposed Miller Homes development on Shurdington Road.

This area has already seen a huge amount of development over the past few years. The massive Redrow estate (plus the proposed one off Church Lane) and the school is changing the area beyond recognition. The beauty of the area is that it is quiet, it has green space and it is close to the countryside. Redrow has already affected this hugely, but adding 350 new homes is going to further compromise this. It will have a huge affect on the local wildlife too, I am already seeing an increase in traffic around the area, which is affecting the wildlife.

The amount of building proposed here is starting to get ridiculous! As a local homeowner I am seriously worried about the fact I have been notified of two of these proposed developments within the space of a week, both in close proximity to my home.

Comments: 22nd September 2021

Already had a huge amount of building work in this area.

More green space lost, busier roads and more pollution.

87 Honeysuckle Avenue
Cheltenham
GL53 0AF

Comments: 2nd December 2020

Shurdington Road offers very limited footpath access and the access there is, is poorly maintained by the local authority. It is such that overgrown foliage makes it inevitable for pedestrians to have to walk on a very busy road as has been pointed out to the local authority during the course of 2020. Furthermore, Shurdington Road suffers from excess traffic during the morning and evening peak travel periods making bumper to bumper tailbacks inevitable most weekdays. The proposed planning application is therefore

considered to be excessive for the limitations of the local infrastructure and should be declined.

1 Chatsworth Drive
Cheltenham
Gloucestershire
GL53 0AG

Comments: 11th January 2021

I object to this application

Previous applications for this site, together with other local fields (650 Miller/Bovis), and another at Brizen (TBC) have been refused on grounds of landscape value and traffic congestion. I fail to see how breaking up the applications makes any difference to this refusal particularly considering the added traffic from the Redrow estate at Leckhampton Lane and the new Secondary School.

The density of housing is too high, much more than agreed in the JCS. Some houses are 3 storey high which will have an unacceptable visual impact and out of keeping with the surrounds.

A radical approach is needed with regards to traffic, making people use other forms of transport, and those alternatives need to be in place before the issues arise. We need to seriously consider banning traffic from the town centre and shopping streets like Bath Road, providing park and rides on the outskirts (Shurdington Road), rolling out the E-Scooter scheme to housing estates, providing better public transport, safe cycle routes etc. People will not stop using cars until there is a better alternative.

With the declaration of a climate emergency by our government and local councils we need to act on this immediately and build for the future. It is unbelievable that a housing estate of this size is being considered without using green alternatives to power them. When will CBC start to adhere to their commitments?

Please consider some of the simplest ways to help the wildlife which lives in this area (government advice in 2019 to house builders) Hedgehog Highways, Swift bricks, bat boxes, plant wildflower areas.

The Leckhampton Fields have always held a lot of water, soaking up run off from the hill. If this area is built on where will all this water go?

This area would be better used as a community green space, nature reserve, community garden for growing produce/orchards (it is good quality agricultural land), create small woodland areas to help fulfil the government's commitment to planting trees, provide an area where people can exercise direct from their doors, experience the outdoors to help their mental health... the list goes on!

Sadly Leckhampton is fast losing it's desirable features, and after 50 years here I'm not sure I will be staying!

Comments: 27th September 2021

Further to my comments made in January 2021,

This revised application shows little change regarding zero energy housing. This goes against Cheltenham Borough Council's declaration of a Climate Emergency. The definition of emergency is 'a serious situation requiring immediate action', therefore all new housing should be built to this spec.

The housing density is too great, the infrastructure already cracking at the seams, and loss of green space will take away the character of Leckhampton.

Cheltenham Green Party
157 Hewlett Road
Cheltenham
GL52 6UD

Comments: 1st December 2020

Letter attached.

57 Leckhampton Road
Cheltenham
Gloucestershire
GL53 0BJ

Comments: 5th January 2021

I'm broadly supportive of these plans although would prefer some rather less bland designs for the houses. Our country needs more housing, Cheltenham must take its share and this piece of land seems a good choice especially now that the area to its south has largely been protected.

As a frequent user of it, I will miss the quirky semi-rural nature of the public footpath on the south east of the site but it will still be available for use and will only have housing to one side.

Although being not far from the AONB, this piece of land isn't especially lovely and is close to other housing all of which was built within the last half century. It seems an eminently sensible site for some new housing. All of us live where once were fields or orchards (and before that forests) and should resist coming up with spurious Nimbyish reasons for denying other people a similar opportunity...

1 Charnwood Close
Cheltenham
Gloucestershire
GL53 0HL

Comments: 8th January 2021

Since I regularly drive in and out of Leckhampton, I wish to echo and emphasise the concerns about traffic flow expressed by our Parish Council.

Given the already difficult state of traffic queues along Church Road and Shurdington Road, the large volume of extra traffic that will be caused by the new secondary school, the expansion of Leckhampton primary school and now from this Miller proposal, mean that there should be an intense focus on ways to ameliorate what I predict will be a chaotic situation should the Miller development go ahead.

In addition, I am very concerned that Kidnappers Lane will suffer badly through becoming a "rat-run". This lane has no footpaths and is totally inadequate for two-way traffic and will become very dangerous for all of us, including the school children and many walkers who use it.

My concerns about this proposed development are thus threefold:

- 1) Traffic!
- 2) Traffic!
- 3) Traffic!

39 Moorend Road
Cheltenham
Gloucestershire
GL53 0ER

Comments: 8th January 2021

Firstly I am a Leckhampton resident for 20 years and live relatively close to Burrows Field and the area of these proposed houses.

My wife and I regularly enjoy walking the path that runs between the small holdings, some of which will disappear if this goes ahead.

I am not a NIMBY-ist and recognise that there is a need for additional housing. The question is what sort of housing?

Does Cheltenham need more £1m houses like the ones being built at the top of Leckhampton Hill not far from the Star College?
I don't think so.

What Cheltenham needs - like the rest of the country - are affordable homes and starter homes.

Local authorities need to demand this type of housing, but do they have the power to require this or are they cowed by the financial muscle of the builders who want to build houses that fit their economic picture of the area.

I have not read the application for this proposed housing. In a way the specifics are is not relevant - the question remains what sort of houses are being built? They need to be the right sort of houses for the future of the country, not what builders and this government want.

104 Shurdington Road
Cheltenham
Gloucestershire
GL53 0JH

Comments: 8th January 2021

1. I make the following comments as a "STRONG OBJECTION" to the above planning application

and I feel there are many very important issues to consider.

2. In the 40 years my husband and I have lived in our current bungalow home we have come to greatly value

the nearby fields etc and the associated wild life - we are horrified by their planned Destruction!

3 I also support ALL the Comments from my husband (sent on 6.1.21) - as briefly detailed below:

a. The Siting of a new Toucan Crossing right outside the front of our bungalow home allowing a full view

into our front garden, lounge and kitchen. This is in addition to the obvious noise, pollution, breach of privacy

and security risk, which would result. There are also similar Objections from the Merestones Estate Residents,

whose homes would back onto this new Toucan Crossing.

b. Excess Traffic on Shurdington Rd - associated current dangers and pollution etc.

c. Serious Flooding Risks.

d. Closeness of the new 350 homes to existing residents.

e. The proposed 350 Homes ignores recent JCS. Local Plan decisions, limiting the numbers of new houses to 200 on this location.

I understand my neighbours are also submitting similar comments of concern.

This email is sent to the best of my knowledge and understanding and I ask that you give this email your full consideration.

67 Moorend Road
Cheltenham
Gloucestershire
GL53 0ET

Comments: 8th January 2021

We object to Miller Homes' planning application to build 350 homes on land at Shurdington road because of:

- 1) The adverse impact on the landscape
- 2) The adverse impact on the view towards Leckhampton Hill
- 3) Increased traffic on local roads that are already at saturation point morning and evening
- 4) The adverse impact on air quality caused by the inevitable increase in traffic

85 Painswick Road
Cheltenham
Gloucestershire
GL50 2EX

Comments: 15th January 2021

I object to this application for two main reasons:

It is a further removal of open, wild space that provides recreational access for local residents. Particularly important at the moment with the increase in mental health illness. Also the removal of natural habitat for wildlife. I walk and run here regularly and if this building goes ahead I will need to use my car to travel to somewhere where I can enjoy open green space. As will many other local people. This will increase pollution and traffic on local roads. Which brings me to my second point which is the impact of an additional 350 dwellings on the local infrastructure- Shurdington Road is already heavily congested and this will increase significantly as well as other roads in the area which are already heavily used. If this development goes ahead we will lose a valuable local asset and spoil another area of our town. And lose more habitat for wildlife.

23 Lichfield Drive
Cheltenham
Gloucestershire
GL51 3DQ

Comments: 15th January 2021

I strongly object to this latest housing development.

As a resident of Warden Hill I'm extremely concerned about the lack of natural environment and also the flooding that may be caused by this development with the reduction of trees and natural habitat.

Flooding is already a major problem in this area and the reduction of green space and trees will just make this situation worse. We've get several garden floods each year from rainwater pouring down from Shurdington road.

However my biggest issue is with the natural habitat and beauty this area gave us. There's little enough green space around and reducing this even more seems to be done purely for profit.

There seems to be no concern or regard to the wildlife or the wellbeing this area provides for walking or enjoying as it is.

I'm disgusted to see that the trees have already been hacked down (not cut - hacked down judging by the mess) so I can only assume that this is a done deal.

Let's hope any house built on this land are not done to the same quality as the greenkeeping - all though there won't be any when the builder finally leave will there?

There seems to be an ongoing attitude just to buy up land and build and then repeat, putting even more burden on the local resources such as the local surgeries, schools. Let's just cram in houses as and where we can.

Pretty disgusted that this was even given proposal green light.

20 Wells Close
Hatherley
Cheltenham
Gloucestershire
GL51 3BX

Comments: 17th January 2021

Leave the beautiful fields and natural open space alone. Leave nature alone. We, humans benefit from seeing the fields and walking through them, for our mental health. Stop taking it away from us. The area is more prone to flooding than ever before and it also makes other nearby areas like Warden Hill flood even worse with the building that's going on in that Shurdington area now. Our drainage system cannot cope now with downpours and houses have flooded.

Comments: 9th February 2021

Shurdington Parish Council have been made aware of the planning application for 350 homes on land at Shurdington Road, Leckhampton. We apologise for not being able to respond fully by your 15th January deadline and hope you will accept our submission.

The Parish Councillors resolved at our meeting on the 8th February 2021 to support the recommendation already submitted by our neighbouring parish council - Leckhampton with Warden Hill PC. They are:

A. The proposed development on the valued landscape areas R2 and R3 should be removed. The boundary hedge at the north end of R2 needs to be enhanced with tall trees to screen the housing north of R2 from view from Leckhampton Hill.

B. Because of the failure of the traffic mitigation that was the condition for including the development in the Cheltenham Plan and the high risk of severe cumulative traffic

congestion, the development needs to be refused for the present until the traffic impact from the new secondary school and other existing development is sufficiently clear and the cumulative traffic congestion is shown to be acceptable.

C. The valued landscape and interesting character of the smallholdings area needs to be protected on both sides of the smallholding footpath and a sufficiently high screening hedge and trees provided along the northern border of the smallholdings to hide the development from view from the public footpath. The proposals need further work between Miller Homes and the Parish Council.

D. The treatment of ecology issues is generally good, but some surveys need updating particularly regarding dormice. The protection of hedgehogs also needs addressing. An enforceable Landscape and Ecology Management Plan (LEMP) and Construction Ecological Management Plan (CEMP) should also be produced. A Biodiversity Net Gain Report would be helpful.

E. There are possible flooding risks that need to be kept in mind during development, notably the risk to properties on the north side of the A46 from water flowing from the Northern Fields including flows under the A46. With climate change there is a possible risk that very heavy run-off down Hatherley Brook from a major storm could cause flooding in residential area west of the A46 along the course of the Brook. The future vulnerability along Hatherley Brook needs to be checked since development on the Northern Fields will remove the option to use the land to hold flood water back if needed.

F. Consideration should be given to making the development more supportive of CBC's aspirations for Carbon Neutral Cheltenham and for promoting cycling by connecting the cycle ways externally.

G. The Council also recommends that roads in the development should be given historic names relating to the field names and the use of the Northern Fields for agriculture since Saxon times.

76 Canterbury Walk
Cheltenham
Gloucestershire
GL51 3HF

Comments: 9th December 2020

The Shurdington Road is already extremely busy with long queues in both directions at peak times and school times. This is a very large proposed development and will bring with it huge amounts of extra traffic. The surrounding roads will become 'cut through' routes with traffic looking to avoid the queues. A lot of extra pollutants will be suffered by local people, particularly as a large area of trees will have to be removed. It is well documented that hedges are a vital wildlife habitat, these will be destroyed. The area has numerous natural springs and the area is usually very wet, where will all this water go when the area is developed? As someone who lives lower down the hill and already suffer from run off from the property next door I fear this will only get worse.

Flooding is rapidly becoming a national issue and all these new roads, driveways and patios will only make this worse in our local area.

Our doctors surgeries are already difficult to access due to the number of patients on their books, infant and junior schools are full and any addition to their size will also add to serious traffic issues for people living near them.

7 Merlin Way
Cheltenham
Gloucestershire
GL53 0LS

Comments: 15th January 2021

I am submitting my objections to the proposed Miller Homes planning application 20/01788/FUL

My objections cover two main points:

1. Landscape, pollution and ecology.
2. The planning application does not adhere to the national housing crisis in a meaningful way.

Regarding Point 1 :

In 2018 the JCS proposed 200 homes on the Northern fields. Now that number has increased to 350. That is an unacceptable number of proposed housing given the original JCS recommendation.

After reading the planning application documents, I support the arguments made by the Cheltenham Green Party on the planning application

I also support also the arguments about preserving the landscape, traffic and ecology made by the Leckhampton with Warden Hill Parish Council.

Section 2: I also object to the unacceptable damage to the valued landscape of the Leckhampton Fields.

Section 3: I also object to the development together with the new secondary school which could create severe traffic congestion in the term-time peak morning traffic period unless the proposed improvement to the traffic flow at the A46/Moorend Park Road intersection can be made to work.

Section 4: I strongly support further discussion regarding the future of the smallholdings along the public footpath. As the Parish Council have stated, these smallholdings are part of the special landscape character that contributed to the area being identified as Valued Landscape by the Secretary of State in 2016. There must be more significant effort to protect the landscape character along both sides of the footpath and create more than a narrow corridor. Living very close to the footpath, I use it regularly to walk around the Leckhampton fields. The small holdings are a valuable resource that, notably, provide character to the area as well as a useful green space. From my house, I can hear the cockerel crow in the mornings and sheep bleating in spring and summer time. On quiet early mornings I can hear woodpeckers and visits from deer are not unusual.

Regarding Point 2:

I cannot support housing developments which do not attempt to solve the national housing crisis. Houses are being built in Cheltenham that are deemed affordable. I have looked at a similar development at the Brizen Farm (Redrow) development and on their website I see that 'affordable' means shared ownership or renting from Sage Housing. Given that the dire shortage of housing in the UK is down to a chronic lack of council/social housing it is disingenuous to suggest that people can be effectively housed when so many developments are addressing first-time buying and increasing the number of private landlords. Meaningful attempts to tackle the housing crisis would propose the building of a significant number of council homes. Therefore, I conclude that land development in the 'sought after' Leckhampton area is purely about profit and not people.

I object strongly to this planning application.

Comments: 14th January 2021

My objections cover two main points:

1. Landscape, pollution and ecology.
2. The planning application does not adhere to the national housing crisis in a meaningful way.

In 2018 the JCS proposed 200 homes on the Northern fields. Now that number has increased to 350. That is an unacceptable number of proposed housing given the original JCS recommendation.

After reading the planning application documents, I support the arguments made by the Cheltenham Green Party on the planning application. I also support also the arguments about preserving the landscape, traffic and ecology made by the Leckhampton with Warden Hill Parish Council.

The Parish Council object to Section 2 of the planning application. I also object to the unacceptable damage to the valued landscape of the Leckhampton Fields.

The Parish Council object to Section 3 of the planning application. I also object to the development together with the new secondary school which could create severe traffic congestion in the term-time peak morning traffic period unless the proposed improvement to the traffic flow at the A46/Moorend Park Road intersection can be made to work.

The Parish Council object to Section 4 of the planning application. I strongly support further discussion regarding the future of the smallholdings along the public footpath. As the Parish Council have stated, these smallholdings are part of the special landscape character that contributed to the area being identified as Valued Landscape by the Secretary of State in 2016. There must be more significant effort to protect the landscape character along both sides of the footpath and create more than a narrow corridor. Living very close to the footpath, I use it regularly to walk around the Leckhampton fields. The small holdings are a valuable resource that, notably, provide character to the area as well as a useful green space. From my house, I can hear the cockerel crow in the mornings and sheep bleating in spring and summer time. On quiet early mornings I can hear woodpeckers and visits from deer are not unusual.

The second main issue is that I cannot support housing developments that do not attempt to solve the national housing crisis. Houses are being built in Cheltenham that are deemed affordable. I have looked at a similar development at the Brizen Farm (Redrow) development and on their website I see that 'affordable' means shared ownership or renting from Sage Housing. Given that the dire shortage of housing in the UK is largely down to a chronic lack of council/social housing it is disingenuous to suggest that people can be effectively housed when so many developments are only addressing the needs of first-time buying and increasing the number of private landlords. Meaningful attempts to tackle the housing crisis would propose the building of a significant number of council homes. Therefore, I conclude that land development in the 'sought after' area of Leckhampton is purely about profit and not people.

I object strongly to this planning application.

103 Cirencester Road
Charlton Kings
Cheltenham
Gloucestershire
GL53 8DB

Comments: 13th January 2021

SHURDINGTON ROAD GRIDLOCKED - NO MORE CARS, PLEASE. Can Miller homes put as a condition of purchase that each resident must own a bicycle?

10 Warwick Crescent
Charlton Kings
Cheltenham
Gloucestershire
GL52 6YZ

Comments: 14th January 2021

I wish to object to the proposed development. I grew up in the area and still have family there who will be severely impacted by this project. The reasons for my opposition are the same as many others, in summary being:

Number of houses - 350 is a considerable number and in excess of what is in the JCS. This will impact the volume of traffic and the associated issues this brings, on Shurdington Road and the surrounding lanes. The local services and amenities will also be stretched more than they are already are.

Visual impact - Three storey houses will affect the sky line and are not in keeping with other properties in the area. The view from the Cotswold AONB - Leckhampton Hill will be impacted. It would also affect the views from other parts of the AONB.

Environment - There is already issues with the amount of water coming off the hill. This development would add to this. People are appreciating green spaces and the benefit of walking and being in the countryside. This would also put pressure on other areas. Local nature would be significantly be impacted.

For the reasons stated above, I strongly object to the proposed development.

25 Timperley Way
Up Hatherley
Cheltenham
Gloucestershire
GL51 3RH

Comments: 15th December 2021

Letter attached.

6 Clare Place
Cheltenham
Gloucestershire
GL53 7NH

Comments: 2nd December 2021

I was completely dumbfounded when the Miller Homes application for 350 homes on land off Kidnappers Lane and Shurdington Road was brought to my attention. I cannot believe this is even being considered with the impact of this number of additional residents in an area where the infrastructure is already struggling to cope with present demands. I challenge any member of the planning committee to try driving in or out of Cheltenham on the Shurdington Road or along the Bath Road within a couple of hours of rush hour in the morning or evening on an average working day. This only gets worse as Christmas approaches, or when there are race meeting or festivals - activities which are necessary for the financial success and reputation of the town. It is preposterous to consider adding to the increased burden already caused by the existing development on land between Leckhampton Lane/Church Road and the Shurdington Road. The aforementioned roads cannot take even more traffic! A further complication is the presence of schools in the area. Leckhampton Primary School has a serious problem with traffic in Church Road at the present time, and any increased traffic can only exacerbate this situation. As for the large secondary school under construction in the area - to which it has been suggested that pupils will walk! - anybody with children will know that cold rainy and dark mornings are not conducive to walking for many people and the additional traffic this entails will further contribute to the congestion.

The next problem I wish to highlight is that of drainage. Housing development has already covered a considerable area of farmland near to this proposed development. The proposed development will cover even more, and water washing down from the slopes of Leckhampton Hill has to go somewhere. Increasing severe weather events have been forecast as the impact of global warming becomes even more evident and we are already seeing the impact of climate change. As a local resident who witnessed the impact of the rainstorm as far back as 2007 I would be most concerned that the measures which the developers claim to be putting in place will be woefully inadequate. The greater rate of runoff from impervious surfaces as opposed to fields will be felt by all of us who live in lower lying areas.

The impact on wildlife is also a consideration. Doormice are known to inhabit this area, but their nocturnal habit and the fact that they hibernate for a considerable part of the year makes them very hard to record and quantify. I would like to be assured that sufficient research has been undertaken by suitably qualified researchers, and not just a cursory inspection. Hedgehogs are also present in this area, and they are notoriously vulnerable to roads and cars. Once disturbed by construction work they invariably move

and are killed on the surrounding roads. Gloucestershire Wildlife Trust has data which is available for inspection on the decline of these and many other native animals and birds. My final point is the lack of infrastructure. There are no shops within convenient walking distance, nor doctors' surgeries, dentists, chemists, libraries, or even places of worship. All of these services will have to be accessed by the occupants of the houses, and they will have to drive there and back every time they make use of them. Many of the services are under severe strain anyway - local doctors, for example, are under considerable strain due to increased workload. On the above grounds I urge the planning committee to reject the planning application outright.

Brockworth Parish Council
Court Road
Brockworth
GL34ET

Comments: 23rd February 2022

Brockworth Parish Council considered the amended plans and continues to OBJECT to this application due to the continued concerns regarding the cumulative impact on the A46, congestion and road safety and that significant improvements to walking, cycling and public transport connectivity need to be made to ensure that the development is as sustainable as possible with good connectivity to the surrounding areas.

4 Pickering Close
Cheltenham
Gloucestershire
GL53 0LE

Comments: 7th December 2021

I'm horrified by the amount of houses planned for Leckhampton.

I have lived in the area for forty five years and my house backs onto the Shurdington Road. Three times this year the apple tree in my garden has been surrounded by a lake of water and on one occasion the water got under the floor boards of the house and knocked out the electrics and warped the doors.

As my neighbours pave over their driveways and more and more houses are built the flooding situation will worsen.

I'm also very concerned about the increased traffic and air pollution - as anyone will tell you trying to cross the Bath Road in the day time will confirm. I used to be able to drive to Gloucester in twelve minutes but it can now take 30 - 40 minutes due to increased traffic. A new senior school opening will mean constant traffic jams in the area at peak times. 350 houses will introduce a further 700 cars, and will completely destroy the village feel Leckhampton has always benefited from.

I strongly feel the council should concentrate on converting empty properties into accommodation for people to live in, and stop the mindless vandalism of building on every available green space.

4 Pickering Close
GL53 0LE

2 Kenelm Gardens
Cheltenham
Gloucestershire
GL53 0JW

Comments: 5th October 2021

As occupants of Kenelm Gardens, we notice the vast amount of traffic on the Shurdington Road at peak times. We object strongly to the proposed plans for the building of 350 homes which will dramatically increase the density of traffic and pollution.

The plans to give access to schoolchildren are a sign of the lack of planning to the huge increase of traffic these plans will produce.

Flooding is an ever increasing problem globally, but especially for Hatherley Brook.

As a scientist I am devastated by the proposed eradication of flora and fauna in this area of natural beauty.

Our future is not about profit for builders but about consideration for the welfare of our children and their environment.

25 Pilley Lane
Cheltenham
Gloucestershire
GL53 9EP

Comments: 28th September 2021

I object to the Miller Homes application. This will be another car-dependent development because it is devoid of any infrastructure. This is essential for such a large development. It will be very close to another car -dependent development, namely Redrow Homes, also without any facilities, making a total of nearly 800 houses without a shop, GP surgery or any other business. The nearest shops are in Salisbury Avenue, Morrison's supermarket or Bath Road shops, all too far to get to on foot. Climate emergency appears to have been totally forgotten. So much for encouraging people to walk or cycle. Traffic generated by these two huge developments and the new secondary school will be unsustainable.

A community is made up of residents of all ages with facilities that encourage people to 'stay local' such as shops, pubs and leisure facilities. A comment in a national paper recently said that community halls are integral to any village, town or neighbourhood.

This development, however, will create a housing estate mainly for those residents who are of working age and who can drive to work or the shops. Older people will not want to live in an area where there are no shops or facilities they can walk to, hence this development will be divisive socially.

In January the late Minister for Housing said that the government was setting out to 'build better' He also said that we should aspire to pass on our heritage and our unique built environment, and to avoid the development of 'anywhere' places that have little connection to local character.

Within the application there are many pictures of local housing styles in this area of Cheltenham, some older style houses and some new builds. Materials used are mainly brick and stone, yet wooden cladding is widely seen as a building material in these pictures, which is totally inappropriate in this area, and would be more suited to a seaside resort. The street scene as an example of the development is totally devoid of any character. There are no hedges for birds to nest in and wildlife to thrive in. Instead there are rows of metal railings in the small front gardens with no room for much planting of flowers and shrubs. This produces a monochrome effect on a large scale. There should be a mix of wooden fencing, brick walls and railings, all part of a traditional neighbourhood. Grassy areas between and around the houses do not support much wildlife. Sadly, this will be just another 'anywhere' development to the detriment of Cheltenham.

11 Canterbury Walk
Cheltenham
Gloucestershire
GL51 3HQ

Comments: 16th September 2021

As residents of Canterbury Walk, Warden Hill, we are suffering from serious surface water flooding to our garden which had only started 2-3 years ago, i.e. when development started in Kidnappers Lane. We have been in the property 16 years. We would request that the Planning Committee please, please bear this in mind when considering this and any other planning applications and possible affects on the water table. This flooding is having a serious impact on our lives and is costing us time and money and we are seriously concerned about the future and if this situation will only get worse.

257 Old Bath Road
Cheltenham
Gloucestershire
GL53 9EF

Comments: 18th January 2022

I drive through Church Road in Leckhampton and down the Shurdington Road on the regular basis. At certain times of day it's like a car park. How on earth is it possible to say that building all these houses will not impact on these 2 roads particularly? Also which

GP's surgery and local dentist will all these new people be using. These services are already overwhelmed as it is.

Secondly what's going to happen to all the wildlife that currently resides on the land, birds and small mammals. In an age where we are supposed to be supporting our wildlife, is anyone going to relocate it before the bulldozers arrive?

2, Kerelm Gardens
Cheltenham

GL53

GL53 0JW.

30.9.21

re Miller Homes
Leckhampton

Dear Sir,

As occupants of Kerelm Gardens we notice the vast amount of traffic on the Shurdington Rd at peak times. We object strongly to the proposed plans for the building of 350 houses which will dramatically increase the density of traffic and pollution.

The plans to give access to schoolchildren are a sign of the lack of planning to the huge increase of traffic these plans will produce.

Flooding is an ever increasing problem globally, but especially for Hatherley Brook.

As a scientist I am devastated by the proposed eradication of flora and fauna in this area of natural beauty.

Our future is not about profit for builders but about consideration for the welfare of our children and their environment.

Yours faithfully



2 Vicarage Close
Shurdington
Cheltenham
Glos.
GL51 4TH

Cheltenham Borough Council
Planning Department
PO Box 12
Municipal Offices
Promenade
Cheltenham
Gloucestershire GL50 1PP

15 January 2021

Fao Ms Michelle Payne, Planning Case Officer

Dear Sirs

Planning Application Reference 20/01788/FUL. Miller Homes, Leckhampton.

I am writing to formally object to the above planning application. Whilst I have no relationship or association with Cheltenham Green Party, the reasons for my objection are encompassed in the consultation response from that Party.

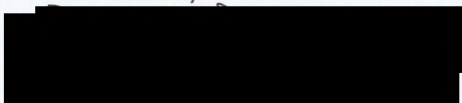
As a responsible Authority you cannot possibly grant planning permission for this – or any other new build residential development – unless the developer enters into a binding obligation:

- Not to install gas central heating or any other gas serviced appliances.
- To provide solar panels on all roofs and charging points for electric cars.
- To provide ground-source or air-source heat pump heating systems.
- To provide grey water harvesting and storage, with plumbing to utilise the same.
- To provide enhanced thermal insulation far beyond the current inadequate standards.

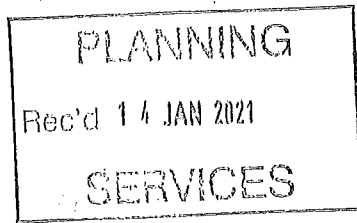
I cannot comment on the case of need for these houses, but surely your Authority has an increasing obligation to put in place policies and incentives to encourage the redevelopment of brown field sites, and in particular change of use from retail/commercial development, as the town centre retail landscape is declining irrevocably.

Unless you are Climate Change deniers, you must know that all the foregoing is likely to become law within the next few years. It is irresponsible of the Authority not to take account of this now, by refusing this application, and advise developers to think again.

Yours faithfully



CC Cheltenham Green Party,



1. 9, Collier End Rise
Leckhampton
Cheltenham
GL53 0PP
12.1.21

To: CRB Planning
Reception Office
Cheltenham

This letter has my comments & objections to the
MILLER HOMES PLANNING APPLICATION 20/0178 & FUL

1. Traffic Congestion.

Currently there is severe traffic congestion along Shurdington Rd. at peak time this can only worsen when the new school opens, because inevitably many parents will drive their children to and collect from school no matter what provisions are put in place for walkways and cycle lanes. To further add to this with the proposed building of 350 dwellings (with probably 500 cars) can only cause further congestion.

2. Pollution levels.

Along Shurdington Rd. the current level of fine particles in the atmosphere exceeds the level of W.H.O guidelines with the knowledge that fine particles are a severe health hazard to all, but particularly to

children and a High Court Ruling recently in London that traffic pollution was the cause of death of a child, any increase in traffic or pollution should be avoided and particularly by reducing cars from a large housing development. Far more children, because of the new school, will be exposed to toxic levels in pollution.

At the Moorfield Rd junction levels of NO_2 in the atmosphere are close to the permitted levels and further increases in traffic could breach the level permitted.

3. Valued landscape.

There are a few Valued landscapes as defined by the Government, the view over Redmington fields being one of them. The Inspector of the J.C.S. stated that no building should take place ~~on~~ to detract from the value of the land and its value in ecology - the habitats of its wild life and plants.



To Planning Miller Homes:

From ~~_____~~
19 The Lanes Leckhampton.

① ~~As living in Leckhampton~~
Village for over fifty years
Renamed Leckhampton Town

② 446 Shurdington Road.
~~traffic enter both~~ road
same. The road not
big enough.

③ Pollution Above Government
Targets.

④ This Development Must
not Go ahead!

⑤ Plant the area with
Trees.

NO GO



Why CBC can and should refuse so many as 350 units on the A46 (Shurdington Road)

The painstaking JCS Examination ruled that the sensitive landscape of Leckhampton should NOT become a Strategic-scale urban extension (defined as greater than 450 houses). Yet permissions have been given for 377 at Farm Lane (Redrow), 25 at Kidnappers Lane (Hitchins) and 12 on Shurdington Road (Kendrick), which totals 414, PLUS a 900-pupil Secondary school, (self-permitted by GCC).

Apart from this now 'Strategic' scale of development, the overall Traffic impact is not far short of Bovis-Miller's application for 650 houses, to which GCC Highways found no objection, but which the appeal inspector and the Secretary of State ruled to have "severe" traffic impact.

For this application, GCC is not an unbiased consultee on Transport, because having pushed its large Secondary school very late into the JCS-envisaged mix, it now prefers not to impact Miller. It is of interest that TBC Planning has very recently discounted a 'no objection' from Highways England to Hitchins' application for 460 houses off the A46 at Fiddington (21/000451/OUT & 21/01348/OUT), and is minded to Refuse, (stating "The application has not demonstrated that there would be an acceptable impact on the strategic road network in conflict with Policy INF1" [of the JCS]).

The narrow unwidenable A46 (Shurdington Road) is the sole southern A-road into Cheltenham town centre, for whose uncongested viability this radial route is vital.

With a still unimplemented (because probably unachievable) scheme for the Moorend Park Road junction, GCC settling for "mitigation through offsite improvements, enhanced walking and cycling connections" is no compensation or solution for a crippled A46 which most residents now predict.

Adding 350 onto Shurdington Road is now simply too many. They are packed in with minimal garden-space (compared to the adjacent estates). There are a total of 891 parking spaces planned (455 North; 436 South), showing that is clearly a drive-to location (too far to walk to shops, etc).

One initial improvement would be to remove the 49 houses sited in fields R2 and R3, which the JCS Inspector indicated should not be developed. The important green corridor along the Hatherley Brook could then be less constricted, benefitting wildlife and amenity.

I have defended Leckhampton's landscape (through regional and local plan and appeal inquiries) since the 1992 Local Plan Examination. This current proposal is excessive, over-dense and (on top of the imminent school) a traffic disaster.

How are residents of the areas between Leckhampton and Charlton Kings to drive to Gloucester or to the Tewkesbury Road retail centre, other than via this critical section of the A46, i.e. from the Moorend Park Road junction to reach the 'ring road' of Up Hatherley Way? It must be kept free-flowing and viable at all times.

Where is GCC's documentation of its claimed 'robust and full' traffic assessment? Instead of any detailed calculations or discussion, GCC (on November 26th) merely summarises what the applicant has asserted, ignoring any evaluation of the submitted counter-evidence.

At the very least, defer this decision for more auditable analysis from GCC Highways, and adequate time to consider it. We need not fear proper independent assessment by another Inspector.

Highlighting some comments from others:

GCC-Highways:

"provides the anticipated number of dwellings in the Cheltenham Plan, and consequently the traffic generation from the allocation was considered at the time of the adoption of the plan."

This is not true; the Local Plan Inspector left a full traffic assessment open for the planning application to demonstrate.

Civic Society:

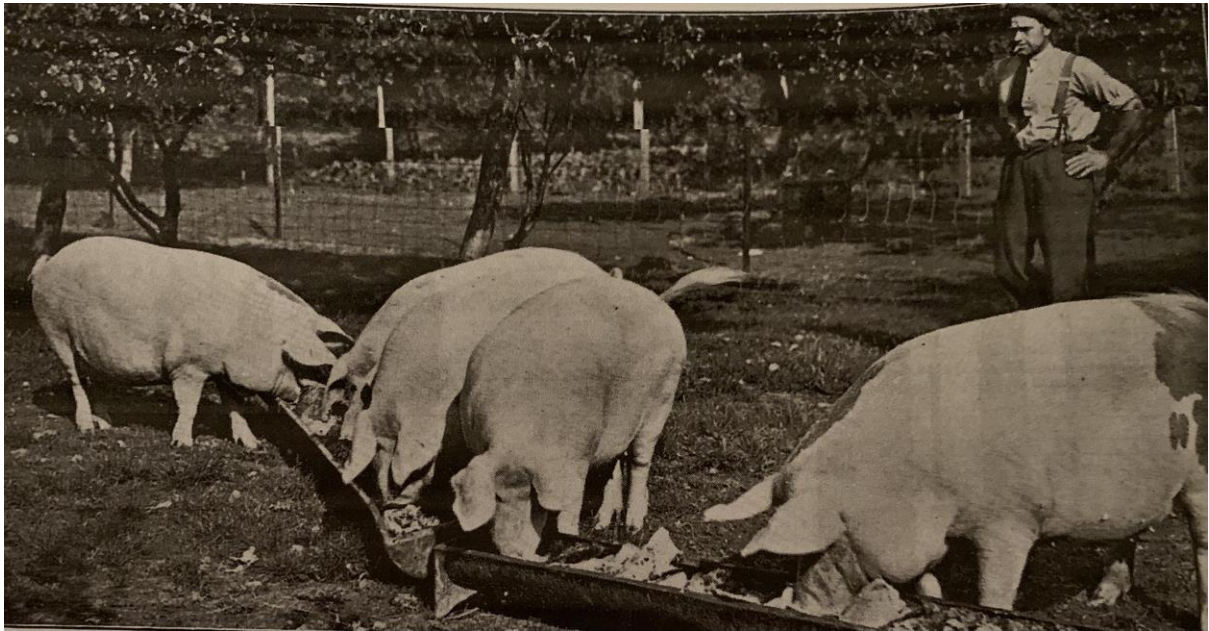
"This is a very high density development: the result of trying to fit 350 units onto the site. This has resulted in some very small units, more appropriate to a city centre development than this semi-rural location. If you compare the size of plots and properties surrounding this site, the proposed density is immediately visible."

CBC Tree Officer:

"there appears to be little scope for new tree planting to mitigate for anticipated losses. The reduction in the number of dwellings would facilitate a less compact application and more potential for greater planting"

Leckhampton with WardenHill Parish Council:

"The validity of the MD4 allocation, of which the Miller development is part, also depends on meeting the condition set by Inspector Burden that the proposed traffic mitigation at the A46/Moorend Park Road junction must be shown to work."



80 Bournside Road
Cheltenham
Gloucestershire
GL51 3AH

Tel:
Mob. Mail:

Dear Ms. Payne

Planning Application # 20/01788/FUL Shurdington Road

I wrote to you objecting to the above proposed development on behalf of 'Friends of Bournside' but this objection, is personal.

My main concern is the inevitable increase in flooding of Hatherley Brook that bounds my property this development will induce and the resultant damage to my property. In short, the water levels in the Brook have increased alarmingly over the past twenty years or so and the number of floods I have witnessed since the infamous floods of 2007, increase year on year. During 2020, to my knowledge the Brook flooded four times, further eroding my land, destroying flora and depositing ever larger amounts of debris on my property. Further the intensity and duration of these floods continues to escalate and the last flood we experienced on 26 December 2020 was the worst I had observed. The Brook, a once gentle stream turned to a raging torrent for over an hour and during that time swept away the flora and tons of topsoil in which it grew and part of a retaining wall. As the photographs below taken on 21 & 29 January 2020 show, what should, at this time of the year be a carpet of snowdrops, ferns and embryonic bluebells, is now a barren, clay base and will never be the same again. Consultants reports aside, this evidence alone illustrates the real effects of further upstream developments and must not be ignored.

We have tended this little haven of ecology for 50 years and overnight, it was simply swept away. This ecological damage is bad enough, but the land erosion is such that a large garden building, erected twenty-five years ago is under threat as the supporting land is becoming seriously eroded. I have enquired about civil work to flood-proof my land and have been advised that, given the restricted access to the brook, would run into tens of thousands to complete.

The point of this letter is not just to put on record the fact that continued upstream development over the past twenty years or so, has increased the volume of water in Hatherley Brook and the consequential flooding is causing substantial damage to my property, but to draw your attention to the 'Flood Risk Assessment' published in support of this further application, that like others in previous applications, has played down the inevitable result that more development has on downstream properties. The report is riddled with theory, assumptions and statistical probability but simply does not state the blindingly obvious, that upstream development increases the threat of downstream flooding. That coupled with climate change produces

inevitable risk of flooding, a fact was clearly pointed out to me by the Environmental Agency following the notorious 2007 floods. The notion that constructing a small 'pond' may well prove effective in protecting the proposed development against flooding but to assume that this will have any effect downstream, where probably thousands of gallons per minute are flowing during high water, is fanciful.

Incidentally the report published on your website has the appendices redacted and this is a serious omission. It may have been an error but if it wasn't, it raises concerns about why this data was not published.

Turning to the Flood Risk Assessment, the stated objectives of the report are:

- *whether a proposed development is likely to be affected by current or future flooding from any source.*
- *whether it will increase flood risk elsewhere.*
- *whether the measures proposed to deal with these effects and risks are appropriate.*
- *The evidence for the local planning authority to apply (if necessary) the Sequential Test, and;*
- *Whether the development will be safe and pass the Exception Test, if applicable."*

There is much that can be challenged in this report on the basis of empirical evidence. It is an axiom that massive upstream development dramatically increases the volume of water in Hatherley Brook with consequential downstream flooding, despite soothing assurances to the contrary. For example, the author states:

"The proposed surface water drainage system will ensure that the development does not increase flood risk downstream, and that the quality of surface water discharge is high. The rate of run off from the Site in all rainfall events up to and including the worst climate changed 100-year event shall be reduced as a result of the development, principally due to the volume of surface water storage that will be installed between the development's surface water collection system and the watercourses. This will help to reduce fluvial flood risk downstream of the Site."

This observation is directly at odds with not just the facts, established by almost daily observations over fifty year but is also at odds with the Environmental Agencies position that upstream development and global warming will increase flooding downstream. Following the 2007 floods, I asked the Agency, given this knowledge, why further development, was permitted to continue. Their response was that they could only act in an advisory role and had no powers of statutory enforcement. One would assume that the Environmental Agency have some input into the development process and if they do, one is entitled to ask the question why the expert view of a government agency charged with the task of protecting the environment, is subjugated by a highly partisan report commissioned on behalf of the Developer?

It is also worth pointing out the emphasis put upon: *'The rate of run off from the Site in all rainfall events up to and including the worst climate changed 100-year event'*.

The report is undated as far as I can see but I assume it was drafted in 2019 or 2020. After the 2007 floods the Environment Agency labelled the flood a 1 in a 100-year event. I have lost count of the number of 1 in a 100-year events that have occurred in the intervening years! During 2020, to my knowledge the Brook at my premises flooded four times.

The report goes on to say:

"Changes to Groundwater Levels

Significant changes to ground water level may have the potential of compromising low land areas where significant level changes are identified."

This acknowledges, what again if obvious, that significant changes to groundwater levels will compromise (for that read 'flooding') low land areas. Since the huge developments in this area 'significant' level changes have indeed been identified. I cite what was considered 'highwater levels following high rainfall some twenty years ago. At my property, being some 1.5 meters wide by 1,5 meters deep would have been considered very high water. On 26 December the Brook in flood measured 8.5 meters wide by 3.5 meters deep. If this is not considered a 'significant' change, I am at a loss to know what is.

Another significant factor to consider is that the development of a large school in this area has been given the go ahead and work is underway. Again, no consideration was given to the downstream effects and this is already having severe effects on the volume of water being channelled into Hatherley Brook and the damage it is inflicting on my property, and indeed it is on my neighbour's properties is marked. A further large housing development will be catastrophic.

Anecdotally, fifty years ago, every day of the year we stepped across, what we referred to at the time as 'the stream' to take the dog for a walk in the fields that used to be at the rear. The photograph below, taken at 15:00 hrs today, 28 January shows the spot where we crossed. It would be most difficult, I suggest, to step across this without wearing waders and the dog would have to swim across! The point is that the recent rainfall has not been unexceptional. Further, it had not rained during the day, yet this is what we have become conditioned to accept is 'he norm'. Climate change aside, the only other factor contributing to this dramatic change is upstream development

Clearly, the need for housing is real, but provision of such should not knowingly result in the destruction of existing properties. The evidence that more development around the course of Hatherley Brook will cause further damage to my property is clear and unequivocal. The case put forward by the Applicant is based on theory, speculation and modelling and should be viewed as such. As I pointed out above, previous Flood Surveys utilised similar methodology to assess flood risk downstream and have all been shown to be plain wrong. Should the above application be approved in the face of this knowledge the Planning Authorities and Developers will be culpable and I will hold them jointly and severally responsible for any consequential damage that occurs.

I do hope common sense and pragmatism is exercised in this matter and the application is rejected.

Yours sincerely



This should have been a carpet of snowdrops, ferns and emerging bluebells by this time of the year. 50 years of nurturing, wiped out overnight on 26/12/2020. No topsoil left at all.



Barren clay. All the topsoil, bulbs, ferns, washed away



At this spot in 1970 we used to step across 'the stream' with two small children and a dog most days throughout the year, to walk in the fields. This photo was taken 29 Jan 2021 after light rain. To cross today, would require waders, and the dog would need to swim! If a child fell in, it would be swept downstream. One can see by the waves that even in calm conditions the velocity of the water is significant. In flood it is a raging torrent.



Remnants of a bank retaining wall washed away on 26 December 2020.



The night of 26 December 2020. Hatherley Brook in full flood. Submerging bridge. 8.5 mtrs wide x 3.5 mtrs deep. This flood raged for over an hour and left devastation in its wake, sweeping away flora, topsoil and part of a retaining wall. Imagine the effect that the new school being built and some further 350 houses, roads etc being constructed will have!

Planning Dept
Cheltenham Borough Council



24 Farmfield Rd
Warden Hill
Cheltenham
GL51 3RA
12th March 2021

Dear Sir or Madam

Re: MILLER HOMES APPLICATION / REDWOOD HOMES APPLICATION
Firstly, apologies for the "hard-copy", but my computer is broken and in repair.

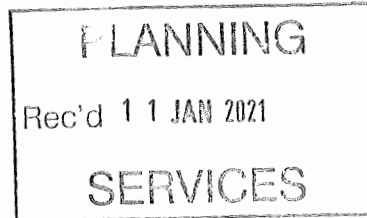
I would like to register my objections to both of the above-mentioned developments. I feel they are totally unnecessary and money-making developments (just like the ones which have destroyed greenbelt land on Church Lane (and which are a total eyesore). These other two will destroy yet more lovely countryside, solely to provide yet more totally uncalled for "executive" homes, as if there aren't already enough of them in and around Cheltenham. The impact of any new build around the local area will be enormous. Traffic levels in the Shurdington Road/Warden Hill (and feeder roads) are already chaotic, polluting and congesting. We will already suffer the extra loading by the construction then completion and use of that new school on Kidnappers Lane, not to mention the rebuild of that junior school in Durham Close. We already have to put up with non-stop, speeding traffic along our local roads, especially mine, from the school and the short-cuts taken for the "school run" and associated parents' parking! These two proposed developments will just further ~~add~~ add to the chaos and congestion.

Nobody in any council (especially Cheltenham) seems to care about the environment, but give plenty of lip-service to it. Money talks and seems to be the only thing that matters. There are plenty of brown-field sites to build on for the benefit of precious, "hardworking" executives - or would these sites be too lowly for them?!!

I really hope these two developments do not go ahead, but I've no doubt the developers will get their way in the end!

Yours faithfully





98A Shurdington Road
Cheltenham
Glo'shire
GL53 0JH

7 January 2021

To
Cheltenham Borough Council
Planning Department
PO Box 12
Municipal Offices
Promenade
Cheltenham
Glos
GL50 1PP

For Attention of Miss Michelle Payne (Planning Officer)

Dear Madam

**Planning Application no 20/01788/FUL - 350 Houses Shurdington Road
Cheltenham - Formal Objection**

I wish to register my **Formal Objection** to the above Planning Application for the following reasons:

1. **350 new houses** close to our homes is **against all recent Official Decisions**, when the Maximum Level was decided at 200 new homes at this location.
2. The new development will result in the **loss of nearby valuable and enjoyable countryside and the destruction of natural habitat/wildlife.**
3. **Traffic on the Shurdington Road** is already near Maximum levels and the extra homes planned and being built (at Brockworth and also on various locations on this Shurdington side of Cheltenham) plus the new secondary school - will only increase the tail backs, road dangers and associated levels of Pollution. I have first hand daily experience of the current traffic problems on the Shurdington Road.
4. **Flooded areas** are already of local concern and the building of 350 nearby new homes could easily increase this problem.
5. The plans also include a **Toucan Crossing** right outside the front of my neighbour's bungalow home (104 Shurdington Road). This will obviously result in a Breach of Privacy, an Increased Risk of Security problems, as well as additional Pollution from vehicles stopping and starting. I do not feel this crossing is necessary at this position.

This is the **same location** that only a few years ago, there were proposals as part of an earlier Planning Application for a **new Bus Stop and Lay by.**

Following significant public concern the Applicant **withdrew** this Bus Stop issue - with the support of Cheltenham Borough Council and the County Council Highways.

I ask that you give all my comments your full consideration.

Thanks

From

98 Shurdington Road
Cheltenham
Gloucestershire
GL53 0JH

20 Nov 2020

Your Reference 20/01788/FUL Miller Homes 350 Houses

Sir,

you will note that because of the COVID restrictions any public consultation is currently severely limited. Therefore, I believe it to not be in the public interest to close public opinions less than 30 days after the Government lifts the rules for the public. Which may or may not be 2 Dec.

The traffic situation in the area is **“severe”** with long delays and, over used rat runs, buses held in traffic, non-existing cycle paths, few footpaths, and no direct links to rail services. Indeed, the Shurdington Road serves as the Southern arterial road to Cheltenham.

The 2016 the Secretary of State concluded: “sections of the highway network which are **already operating at over-capacity** levels”. The Secretary of State **“severe”**.

The 2020 Appeal concluded:

50. The 2016 appeal decision has been highlighted by interested parties, within which the Secretary of State concluded amongst other matters that those proposals would contribute to a severe impact on traffic within a wider area of Cheltenham. However, the 2016 appeal comprised a significantly larger mixed-use scheme including up to 650 dwellings and commercial uses. As such it is not directly comparable to the current proposals. Conversely, it is noteworthy that the Inspector for the 2018 appeal (for 45 dwellings) was satisfied that any increase in traffic would not result in any significant effect on highway safety.

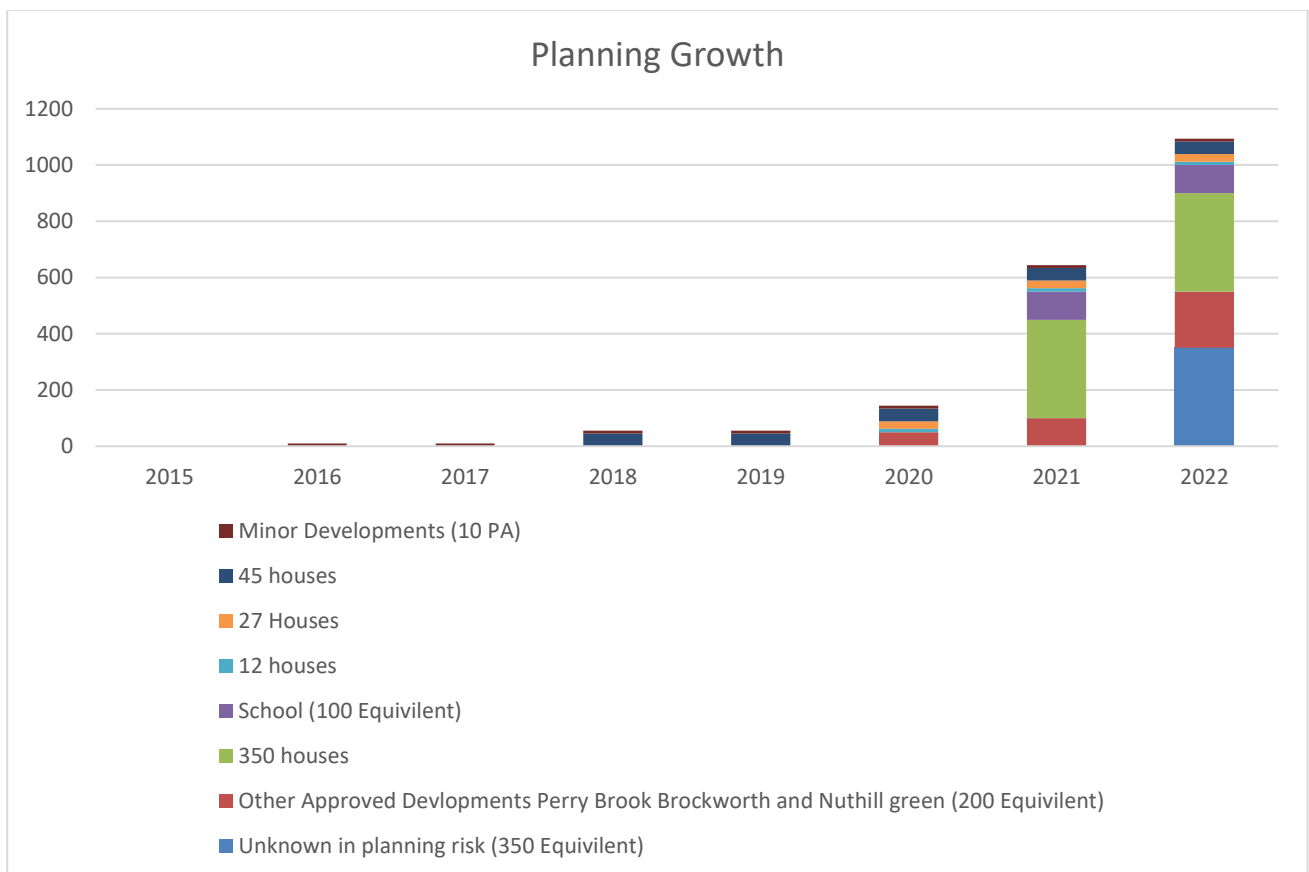
51. Cumulative traffic impact with the nearby emerging allocation MD5 has been cited, however, **the Traffic Assessment for the secondary school application is not before me in the evidence, and I was informed at the inquiry that consideration of the traffic impact of the school proposals is ongoing.**

52. I note the lack of objection from **the Highway Authority subject to conditions,** including measures to improve visibility and provision of a footway to connect the site to the edge of Cheltenham. Whilst there would be no direct access to public transport from the appeal site, there are bus stops with frequent services between 10-13 minutes’ walk

away which lead to the centre of Cheltenham and beyond 19. This is a reasonable distance to make public transport a viable alternative to use of the car for some residents.

53. In view of the above I have no reason to reach a different conclusion to the previous Inspector in the 2018 appeal nor the Highway Officer's comments that the proposals would not result in an unacceptable impact on highway safety nor would the residual cumulative impacts on the road network be significant.

Thus, with traffic at "Severe" in 2016 as baseline and using a simple comparison to the how the traffic would be expected to increase/decrease the growth looks like:



Thus by 2022 the traffic plan needs to reduce the flow by the equivalent of an estimated 1000 houses to reduce the traffic below "Severe". With no agreed plan for the area the Secretary's view should remain valid.

The Gloucestershire Connecting Places document was last reviewed in 2017 and has no mention of the "Severe" nature of Traffic in the area. It has this road as an urban link! Whereas it is the Southern arterial road the Cheltenham. The only comment was to Highway improvement A46 (Shurdington Road) corridor, Cheltenham but not a priority!

<https://www.gloucestershire.gov.uk/media/2227/11-pd-4-highways-nov-2017.pdf>

The Cycling and Walking plan seems to avoid this area completely.

<https://www.gloucestershire.gov.uk/media/2095888/cycling-and-walking-infrastructure-plan-v2-20200806.pdf>

The Connecting Places strategy also seems to avoid this area completely. Not Severn? not Tewkesbury?

<https://www.gloucestershire.gov.uk/transport/gloucestershires-local-transport-plan-2015-2031/connecting-places-strategies-cps/>

My last comment on the specific proposal is that is largely a good plan but fails to link to any network. I present my own study into footpaths in the development area please see attached.



This is a photo Oct 2020 of the main footpath from the A46 to Leckhampton Hill via the Church. It lays adjacent to the 350-house site. This route will be the shortest route from the school, to the Town Centre, The Park Campus and Bath Road.

Therefore, I cannot support these proposals because:

The traffic in the area is classed as “Severe” and no effective plan has been presented to reduce that state. Whilst the on-site proposals are good, they don’t connect to any footpaths or cycles paths which meet the any standards required. This whole area of Cheltenham needs to be upgraded but I was unable to find a coherent plan from Gloucestershire Council, Tewkesbury or Cheltenham.

Yours Sincerely

FOOTPATHS SOUTH CHELTENHAM

Alan Bailey

Lechampton Resident

Nov 2020

Table of Contents

INTRODUCTION2
 DEFINITIONS2

LEGISLATION.....3

STANDARDS3
 SAFETY3
 SIGNAGE.....4
 ACCESS.....4

CURRENT STANDARD AS ENCOUNTERED4
 ENCROACHMENTS.....4
 THE NEEDS OF THE LESS ABLE AND SAFETY4
 CYCLE PATHS.....5

MANAGEMENT AND MAINTENANCE.....5
 MAINTENANCE5

PLANNING APPLICATION AND COUNCIL APPROVAL6
 EXAGGERATED STATEMENTS:.....6

CONCLUSION.....6

INTRODUCTION

The COVID 19 outbreak of 2020 gave a new need for local footpaths as many people needed to exercise from home without using public transport. Having recently moved to the area this provided the opportunity to explore Cheltenham, Lechampton, Pilley and Warden Hill and the town centre.

It has long been a *stated aim* of the Government and County, Town, and Parish Councils to improve the provision of alternative forms of transport! As the public emerged from lockdown, the planning authorities began to look at improving the access for pedestrians and cyclists.

Prior to the outbreak I became involved in two planning applications which both described the *network of footpaths and communications as excellent*.

It quickly became obvious that the footpaths around the area were far from excellent. Indeed, they were non-existent and poorly maintained.

Having always been a fan of “management by walk about”. The need to exercise daily gave the opportunity to visit and record some 100 miles of footpaths. The Journeys ranged from 2 to 9km of circular walks around the South of Cheltenham.

This report aims to identify areas of concern and encourage the planning authorities to accurately assess the claims of developers. The application must consider the wider need to join up developments with the current infrastructure or implement changes in the infrastructure to meet up with developments..

DEFINITIONS

For the purpose of this document a Footpath goes from A to B a pavement runs beside a road. Many estates are planned single ended so that pedestrians and cyclist need to follow the road.

This document concerns only Urban paths not country walks

Whilst many footpaths are good to the centre of Cheltenham.

Examples of bad or no connection are:

- Lechampton to Railway station
- Lechampton to Warden Hill
- Warden hill to Bath Road
- Shurdington Road to Charlton Kings

LEGISLATION

Highways Act 1980 and use of Access Land under the Countryside and Rights of Way Act 2000 requires that the Local Authority maintain footpaths and Rights of Way. In this area that duty would seem to fall on the Gloucestershire Councils Highway department.

The same Highways Department is required to examine all planning applications thus must agree or disagree with developers' comments and therefore a conflict of interest arises.

Local Authorities are required to authorize any move or closure of roads or paths.

Thus, there is a statutory requirement to:

- Maintain footpaths.
- Manage the move or close of footpaths.

Public rights of way can only be moved or closed for one of the following reasons:

- it's necessary to allow development (if planning permission has been granted)
- the diversion benefits the landowner/occupier
- the diversion benefits the public
- the path is not used by the public (closure only) - these circumstances are rare and very difficult to achieve

When diverting or closing a public right of way, any alternative or new route/path should be just as convenient for the public as the existing path.

STANDARDS

There are numerous technical standards for footpaths and rights of way. This paragraph details the public and my "expectations" as a minimum.

SAFETY

The path should be clear such that any individual can walk with risk from objects, trips or toxic plants.

The risk should be assessed from ground level to the sky. Any overhangs should be at least 2m above the path.

Lighting should be a must where the more vulnerable are expected to walk as an accepted route within a community.

The safety of the less able should be a priority.

SIGNAGE

If footpaths are intended to be used as a route all paths should be clearly marked. To identify the destination route.

All closures should be clearly marked from all access points.

All diversions should be clearly sign posted from the furthest point of entry.

All the information should be considered a public notice and be available on the authority's media pages.

ACCESS

Ideally there should be free access for all.

Any upgrade must consider the less able.

Where animals could be penned there should be gates or stiles to control entry.

Country code signs must be available at all entry points. To clarify, litter, dogs and keeping to paths etc.

CURRENT STANDARD AS ENCOUNTERED

ENCROACHMENTS

Many property owners have encroached onto the highway (footpaths). Which include:

- Fences being moved to benefit the house owner, maybe more than once.
- Fences collapsing onto the highway.
- Overgrown trees bursting onto the footpaths.
- Footpaths being moved.

Maps show that there was a footpath across the field where Warden Hill School was built. That path is closed and managed by the school. It is the only path connecting Warden Hill to the Park. A very questionable decision probable encroachment by the Council on a Public Right of Way.

THE NEEDS OF THE LESS ABLE AND SAFETY

Few footpaths met any needs of the less able.

Parking was a challenge and a risk to all users.

As were refuse bins some industrial bins blocked footpaths completely.

CYCLE PATHS

I have not considered cycle paths but the situation seems confused some of the main parks had clearly marked cycle paths, most streets had none, the footpaths were confused on Up Hatherley there are 3 cycle paths 2 on the road and one on the pavement. Safety issues forces cyclist to use foot paths.

Electric scooters are being used with no education of the public as to what is permitted and what rights these have/ I assume the “operators” are training those who use them.

Management and Maintenance

Public rights of way were closed by the Council without the provision of a diversion suitable for those on foot. The public footpath in Pilley Bridge Nature Reserve has been blocked so there is no through route. The Bridge has been *temporarily* closed for over 10 years. The closure order posted was Out-of-Date, and the signs were missing at the start of one end of the diversion. It is a long pedestrian diversion.

Maps show a footpath along the top of the Pilley embankment but that is now gone.

The footpath routes over the railway at Hatherley were closed with no signs and no diversion, the diversion needed was miles.

Footpaths were closed by landowners and moved by landowners.

MAINTENANCE

The planning applications I examined stated that footpaths and waterways be maintained but they did not say whether these would be privately funded?

PLANNING APPLICATION AND COUNCIL APPROVAL

EXAGGERATED STATEMENTS:

Planning applications included statements which were just throw away lines.

For Example: *“Transport links from Kidnappers Lane to Cheltenham Railway Station are **excellent**”*.

When actually, there are few cycle tracks, no transport links, and its along way to walk, The Number 10 bus can be delayed by one hour at peak time. Reports such as these should be rejected until the statements are evidenced.

Planning Approval implies the Council have agreed to maintaining, paths, road, streams, parks and flood protection but do not seem to change to Councils Plans and budget cuts. Indeed, I believe these requirements are being accepted without financial scrutiny.

When applications state that roads, cycle paths and footpaths will be provided. Then they should link to the Councils transport plans.

Conclusion

I have examples to support all the statements above, but my aim is to highlight the need to join up development with the infrastructure to supports them.

In my opinion, the standard of roads, footpaths and cycle paths in the South East of Cheltenham, including, Shurdington, Leckhampton, Pilley, Warden Hill and Charlton Kings, Varies from poor to non-existent.

My view is that the current infrastructure in this area of Leckhampton, Warden Hill, Pilley and Charlton Kings cannot support these planned developments. Planning Officers must be more critical in the acceptance of reports. Wild statements are worthless to the public or the planning authority.

I have not covered Road Transport as The Secretary of State the has stated that there is a severe traffic problem.

FOOTPATHS SOUTH CHELTENHAM

Lechampton Resident

Nov 2020

Table of Contents

INTRODUCTION	2
DEFINITIONS	2
LEGISLATION.....	3
STANDARDS	3
SAFETY	3
SIGNAGE.....	4
ACCESS.....	4
CURRENT STANDARD AS ENCOUNTERED	4
ENCROACHMENTS.....	4
THE NEEDS OF THE LESS ABLE AND SAFETY	4
CYCLE PATHS.....	5
MANAGEMENT AND MAINTENANCE.....	5
MAINTENANCE	5
PLANNING APPLICATION AND COUNCIL APPROVAL	6
EXAGGERATED STATEMENTS:.....	6
CONCLUSION.....	6

INTRODUCTION

The COVID 19 outbreak of 2020 gave a new need for local footpaths as many people needed to exercise from home without using public transport. Having recently moved to the area this provided the opportunity to explore Cheltenham, Lechampton, Pilley and Warden Hill and the town centre.

It has long been a *stated aim* of the Government and County, Town, and Parish Councils to improve the provision of alternative forms of transport! As the public emerged from lockdown, the planning authorities began to look at improving the access for pedestrians and cyclists.

Prior to the outbreak I became involved in two planning applications which both described the *network of footpaths and communications as excellent*.

It quickly became obvious that the footpaths around the area were far from excellent. Indeed, they were non-existent and poorly maintained.

Having always been a fan of “management by walk about”. The need to exercise daily gave the opportunity to visit and record some 100 miles of footpaths. The Journeys ranged from 2 to 9km of circular walks around the South of Cheltenham.

This report aims to identify areas of concern and encourage the planning authorities to accurately assess the claims of developers. The application must consider the wider need to join up developments with the current infrastructure or implement changes in the infrastructure to meet up with developments..

DEFINITIONS

For the purpose of this document a Footpath goes from A to B a pavement runs beside a road. Many estates are planned single ended so that pedestrians and cyclist need to follow the road.

This document concerns only Urban paths not country walks

Whilst many footpaths are good to the centre of Cheltenham.

Examples of bad or no connection are:

- Lechampton to Railway station
- Lechampton to Warden Hill
- Warden hill to Bath Road
- Shurdington Road to Charlton Kings

LEGISLATION

Highways Act 1980 and use of Access Land under the Countryside and Rights of Way Act 2000 requires that the Local Authority maintain footpaths and Rights of Way. In this area that duty would seem to fall on the Gloucestershire Councils Highway department.

The same Highways Department is required to examine all planning applications thus must agree or disagree with developers' comments and therefore a conflict of interest arises.

Local Authorities are required to authorize any move or closure of roads or paths.

Thus, there is a statutory requirement to:

- Maintain footpaths.
- Manage the move or close of footpaths.

Public rights of way can only be moved or closed for one of the following reasons:

- it's necessary to allow development (if planning permission has been granted)
- the diversion benefits the landowner/occupier
- the diversion benefits the public
- the path is not used by the public (closure only) - these circumstances are rare and very difficult to achieve

When diverting or closing a public right of way, any alternative or new route/path should be just as convenient for the public as the existing path.

STANDARDS

There are numerous technical standards for footpaths and rights of way. This paragraph details the public and my "expectations" as a minimum.

SAFETY

The path should be clear such that any individual can walk with risk from objects, trips or toxic plants.

The risk should be assessed from ground level to the sky. Any overhangs should be at least 2m above the path.

Lighting should be a must where the more vulnerable are expected to walk as an accepted route within a community.

The safety of the less able should be a priority.

SIGNAGE

If footpaths are intended to be used as a route all paths should be clearly marked. To identify the destination route.

All closures should be clearly marked from all access points.

All diversions should be clearly sign posted from the furthest point of entry.

All the information should be considered a public notice and be available on the authority's media pages.

ACCESS

Ideally there should be free access for all.

Any upgrade must consider the less able.

Where animals could be penned there should be gates or stiles to control entry.

Country code signs must be available at all entry points. To clarify, litter, dogs and keeping to paths etc.

CURRENT STANDARD AS ENCOUNTERED

ENCROACHMENTS

Many property owners have encroached onto the highway (footpaths). Which include:

- Fences being moved to benefit the house owner, maybe more than once.
- Fences collapsing onto the highway.
- Overgrown trees bursting onto the footpaths.
- Footpaths being moved.

Maps show that there was a footpath across the field where Warden Hill School was built. That path is closed and managed by the school. It is the only path connecting Warden Hill to the Park. A very questionable decision probable encroachment by the Council on a Public Right of Way.

THE NEEDS OF THE LESS ABLE AND SAFETY

Few footpaths met any needs of the less able.

Parking was a challenge and a risk to all users.

As were refuse bins some industrial bins blocked footpaths completely.

CYCLE PATHS

I have not considered cycle paths but the situation seems confused some of the main parks had clearly marked cycle paths, most streets had none, the footpaths were confused on Up Hatherley there are 3 cycle paths 2 on the road and one on the pavement. Safety issues forces cyclist to use foot paths.

Electric scooters are being used with no education of the public as to what is permitted and what rights these have/ I assume the “operators” are training those who use them.

Management and Maintenance

Public rights of way were closed by the Council without the provision of a diversion suitable for those on foot. The public footpath in Pilley Bridge Nature Reserve has been blocked so there is no through route. The Bridge has been *temporarily* closed for over 10 years. The closure order posted was Out-of-Date, and the signs were missing at the start of one end of the diversion. It is a long pedestrian diversion.

Maps show a footpath along the top of the Pilley embankment but that is now gone.

The footpath routes over the railway at Hatherley were closed with no signs and no diversion, the diversion needed was miles.

Footpaths were closed by landowners and moved by landowners.

MAINTENANCE

The planning applications I examined stated that footpaths and waterways be maintained but they did not say whether these would be privately funded?

PLANNING APPLICATION AND COUNCIL APPROVAL

EXAGGERATED STATEMENTS:

Planning applications included statements which were just throw away lines.

For Example: *“Transport links from Kidnappers Lane to Cheltenham Railway Station are **excellent**”*.

When actually, there are few cycle tracks, no transport links, and its along way to walk, The Number 10 bus can be delayed by one hour at peak time. Reports such as these should be rejected until the statements are evidenced.

Planning Approval implies the Council have agreed to maintaining, paths, road, streams, parks and flood protection but do not seem to change to Councils Plans and budget cuts. Indeed, I believe these requirements are being accepted without financial scrutiny.

When applications state that roads, cycle paths and footpaths will be provided. Then they should link to the Councils transport plans.

Conclusion

I have examples to support all the statements above, but my aim is to highlight the need to join up development with the infrastructure to supports them.

In my opinion, the standard of roads, footpaths and cycle paths in the South East of Cheltenham, including, Shurdington, Leckhampton, Pilley, Warden Hill and Charlton Kings, Varies from poor to non-existent.

My view is that the current infrastructure in this area of Leckhampton, Warden Hill, Pilley and Charlton Kings cannot support these planned developments. Planning Officers must be more critical in the acceptance of reports. Wild statements are worthless to the public or the planning authority.

I have not covered Road Transport as The Secretary of State the has stated that there is a severe traffic problem.

From

98 Shurdington Road
Cheltenham
Gloucestershire
GL53 0JH

18 Nov 2020

Your Reference 20/01788/FUL Miller Homes 350 Houses

Sir,

you will note the because of the COVID restrictions any public consultation is currently severely limited. Therefore, I believe it to not be in the public interest to close public opinions less than 30 days after the Government lifts the rules for the public. Which may or may not be 2 Dec.

In relation to Flood Risk:

My concern expressed at the 19/00334/OUT tribunal is that the combination of these proposals severely increases the flood risk to a brook which floods once or twice a year and is currently subject to the collapse of footpaths downstream of the A46.

Our house is awfully close to the Zone 3 at the culvert. All of the following developments develop nearly all of the land East of the A46, land which has low permeability.

If these are to be individual schemes who will maintain them as the brook East of the Road appears not to be maintained?

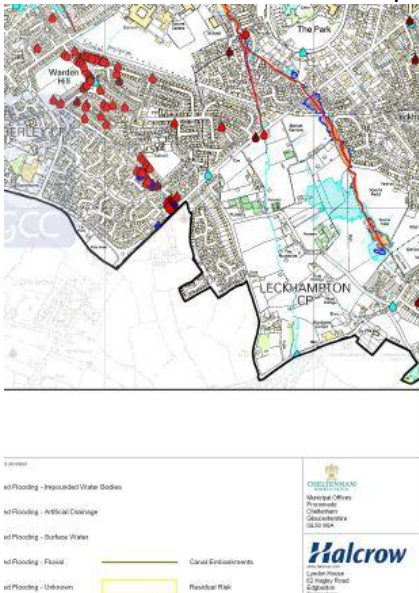
The Flooding implication of all of the following must be considered together.

- 20/01788/FUL Miller Homes 350 Houses Between A46 and kidnappers lane
- 19/00334/OUT 27 Homes Kidnappers Lane
- 19/01690/DEEM3 Lechhampton School
- 20/00332/FUL Burrows Playing Field Footpaths
- 19/02303/OUT 12 Homes Bovis Homes Ltd
- Burrows Playing field astro turf pitches are being added.

Council policy clearly says that if the risk to properties downstream are at risk they must be refused. We lay downstream! as does Council Properties!

1. The subject application has a **very optimistic flood map** when compared in detail to the Council Flood Zones.

Reference 1 Council Flood Map



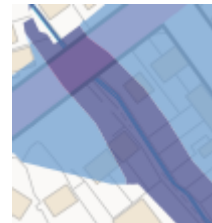
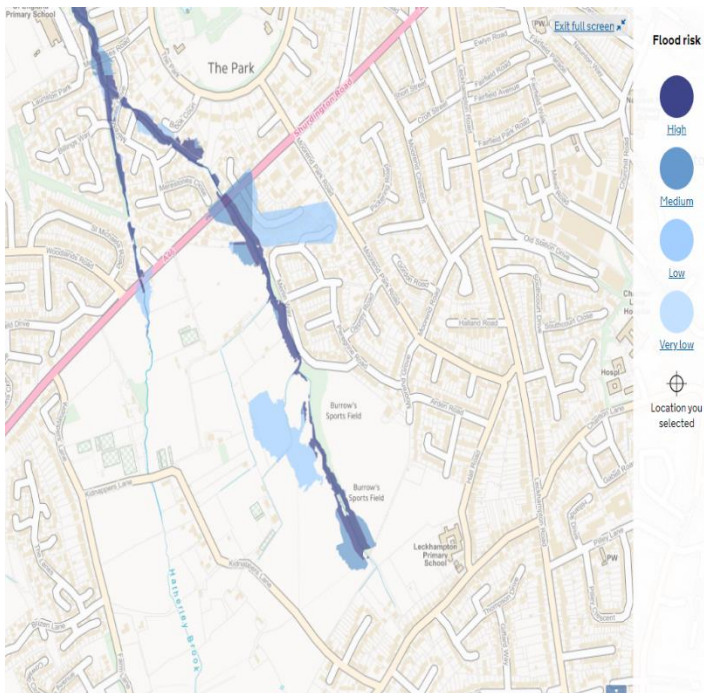
PPS25: Flood Risk Vulnerability and Flood Zone "Compatibility"

Flood Zone	Flooded	Water	Flood	Water	Low
	Impounded	Surface	Fluvial	Artificial	Unknown
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	✓	✓	✓	✓
Zone 3	✓	✓	✓	✓	✓
Zone 4	✓	✓	✓	✓	✓
Zone 5	✓	✓	✓	✓	✓
Zone 6	✓	✓	✓	✓	✓
Zone 7	✓	✓	✓	✓	✓
Zone 8	✓	✓	✓	✓	✓
Zone 9	✓	✓	✓	✓	✓
Zone 10	✓	✓	✓	✓	✓
Zone 11	✓	✓	✓	✓	✓
Zone 12	✓	✓	✓	✓	✓
Zone 13	✓	✓	✓	✓	✓
Zone 14	✓	✓	✓	✓	✓
Zone 15	✓	✓	✓	✓	✓
Zone 16	✓	✓	✓	✓	✓
Zone 17	✓	✓	✓	✓	✓
Zone 18	✓	✓	✓	✓	✓
Zone 19	✓	✓	✓	✓	✓
Zone 20	✓	✓	✓	✓	✓
Zone 21	✓	✓	✓	✓	✓
Zone 22	✓	✓	✓	✓	✓
Zone 23	✓	✓	✓	✓	✓
Zone 24	✓	✓	✓	✓	✓
Zone 25	✓	✓	✓	✓	✓
Zone 26	✓	✓	✓	✓	✓
Zone 27	✓	✓	✓	✓	✓
Zone 28	✓	✓	✓	✓	✓
Zone 29	✓	✓	✓	✓	✓
Zone 30	✓	✓	✓	✓	✓
Zone 31	✓	✓	✓	✓	✓
Zone 32	✓	✓	✓	✓	✓
Zone 33	✓	✓	✓	✓	✓
Zone 34	✓	✓	✓	✓	✓
Zone 35	✓	✓	✓	✓	✓
Zone 36	✓	✓	✓	✓	✓
Zone 37	✓	✓	✓	✓	✓
Zone 38	✓	✓	✓	✓	✓
Zone 39	✓	✓	✓	✓	✓
Zone 40	✓	✓	✓	✓	✓
Zone 41	✓	✓	✓	✓	✓
Zone 42	✓	✓	✓	✓	✓
Zone 43	✓	✓	✓	✓	✓
Zone 44	✓	✓	✓	✓	✓
Zone 45	✓	✓	✓	✓	✓
Zone 46	✓	✓	✓	✓	✓
Zone 47	✓	✓	✓	✓	✓
Zone 48	✓	✓	✓	✓	✓
Zone 49	✓	✓	✓	✓	✓
Zone 50	✓	✓	✓	✓	✓

PPS25: Flood Risk Vulnerability Classification

Flood Risk	Description
Very High	Properties are at risk of flooding and are likely to be damaged or destroyed. The risk is high and the consequences are severe. The risk is high and the consequences are severe. The risk is high and the consequences are severe.
High	Properties are at risk of flooding and are likely to be damaged. The risk is high and the consequences are severe. The risk is high and the consequences are severe. The risk is high and the consequences are severe.
Medium	Properties are at risk of flooding and are likely to be damaged. The risk is high and the consequences are severe. The risk is high and the consequences are severe. The risk is high and the consequences are severe.
Low	Properties are at risk of flooding and are likely to be damaged. The risk is high and the consequences are severe. The risk is high and the consequences are severe. The risk is high and the consequences are severe.
Very Low	Properties are at risk of flooding and are likely to be damaged. The risk is high and the consequences are severe. The risk is high and the consequences are severe. The risk is high and the consequences are severe.

Reference 2 Environment Agency Map and Close up 94 Shurdington Road



2. All of the schemes are best guesswork and do not take into account Global Warming.

This was the Gloucester Council warning Oct 2020.

“Gloucestershire 'danger to life' warning extended into Sunday as torrential rain from Storm Alex set to bring flooding”

The wettest October since at least 1797 was recorded last month with some 159.2mm collected, 238 per cent of average. The month started wet with the daily October rainfall record also broken with 49.1mm on the 2nd, **the wettest day ever recorded in the UK.**

Winchcombe in the Cotswolds had also the average rainfall throughout in October in the first few days of the month. Fortunately for us that was Winchcombe!

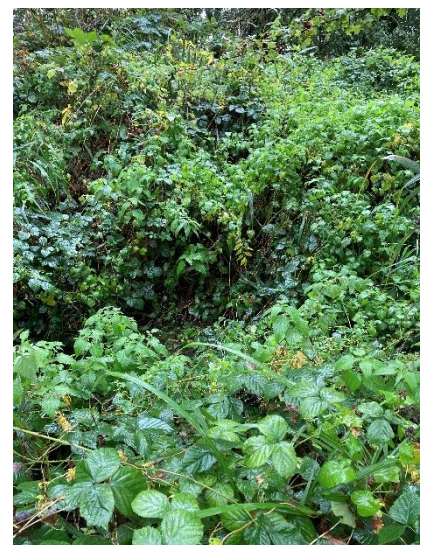


Foot path and land next to Hatherley Brook 2020. *See also developers quote “Excellent network of foot paths!”*

3. Maintenance all of these planned schemes must be mandated, in particular as it is in 19/00334/OUT tribunal conditions.

Maintenance is not carried out and thus the Culvert floods. No clearance has been carried out in 2020.

As shown by this photo. Of the entrance to the culvert. The foliage dies back and blocks the culvert.



4. Damage down stream

The Brook behind Merestones Close has collapsed and has been subject to many repairs. The flood defences cannot cope now, so any development upstream will increase the risk.



I also find it difficult to understand why there was not a broader public consultation on the Application 19/02303/OUT. To quote the Parish Council, *Which leaves many question unanswered?* The Planning Authority was clearly aware of the sensitivity of developments in this area and yet notification seems scant.

Lastly, now is the time to address all 6 development against a common plan. My view is that if there is to be adequate SUDs schemes that will need to be a larger scheme the Millar Homes site downstream of all these developments. Thus, approval now risks no space for any flood scheme in the future.

Yours Sincerely

From

98 Shurdington Road
Cheltenham
Gloucestershire
GL53 0JH

24 Jan 2021

Head of Planning (Mr Mike Holmes)
Cheltenham Bourgh Council
Municipal Offices,
Promenade,
Cheltenham,
Gloucestershire,
GL50 9SA

Your Reference: 20/01788/FUL Miller Homes 350 Houses

Objection – No High-Level Plans in Place

Sir,

Since I have received no replies to my earlier communications I wish to object to 20/01788/FUL Miller Homes 350 Houses.

In my view, at least 6 applications seem to have been considered without the high-level plans being in place as required by the NPPF.

As per my comments below I believe that the NPPF requires that plans be in place covering Flooding and safeguarding land, high-quality sustainable transport links and social and leisure amenities.

It would also seem impossible to deliver a Community Plan unless overarching plans are in place.

Your Sincerely

Strategic Plans Nation Planning Policy Framework (NPPF) suggest that planning system should be genuinely **plan-led**. Succinct and **up-to-date** plans should provide a positive vision for the future of each **area**; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

1. Whilst **strategic plans** are in place for the area around the new Cyber Park I could not find any for Leckhampton and Warden Hill, Shurdington and Brockworth (A46 Corridor) except for the park and ride. Whilst all the NPPF provisions are important the main strategic provisions should be.

Strategic Plans the Nation Planning Policy Framework suggests high level plans should be in place this is the information found relating to the area in question Cheltenham A46 corridor:

	Transport (102 -111)	Utilities / Sewers	Green spaces (91- 98)	Strategic SuDs (157(b))	Social Assets (91 – 98)
20/01788/FUL Miller Homes 350 Houses Between A46 and kidnappers lane	No plan Identified	Area sewers maybe at capacity	Too Small, current Green space at capacity, must make provision for all of the community.	None	None found
19/00334/OUT 27 Homes Kidnappers Lane	No plan Identified	Area sewers maybe at capacity	Too Small, current Green space at capacity must make provision for all of the community.	None	None found
19/02303/OUT 12 Homes Bovis Homes Ltd	No plan Identified	Area sewers maybe at capacity	Too Small, current Green space at capacity	None	None found
19/01690/DEEM3 Leckhampton School	No plan Identified	Area sewers maybe at capacity	Too Small current Green, space at capacity	None	None found
20/00332/FUL Burrows Playing Field Footpaths	No plan Identified	Not required	Too Small, current Green space to capacity and more sports facilities required.	Upstream	Not Required
20/02028/FUL Burrows Playing Field Drainage	NA	NA	Essential to plan	Upstream	Increases flow into river

A main planning condition that has been applied and required by the NPPF the requires a SuDs **lifetime** management. Currently, it is believed that this planning condition cannot be met by any of the schemes:

- Because Authority policies are not in place.
- Authorities will be reluctant to accept the cost of ownership and global warming is an unknown.

Dynamic Suds Management Plans

	Planning Condition	First 5 Years	Lifetime	Adoption Plans	Notes
20/01788/FUL Miller Homes 350 Houses Between A46 and kidnappers lane	Lifetime plan Requested	Expected	??	GCC – No policy CBC – FOI question - No Parish - Not known Private - Not known Severn and Trent - No	
19/00334/OUT 27 Homes Kidnappers Lane	Yes, Lifetime plan Required	Expected	??	GCC – No policy CBC – FOI question - No Parish - Not known Private - Not known Severn and Trent - No	
19/02303/OUT 12 Homes Bovis Homes Ltd	Lifetime plan Requested	Expected	??	GCC – No policy CBC – FOI question - No Parish - Not known Private - Not known Severn and Trent - No	
19/01690/DEEM3 Leckhampton School	Yes Lifetime plan Required Condition 14	?	??	GCC – No policy Parish - Not known Private - Not known Severn and Trent - No	
20/00332/FUL Burrows Playing Field Footpaths	None	Parks Department?	??	Parks Department?	If the plan to install drainage is implements Planning and SuDs would seem to be required.

Before adoption, the public needs to know the cost of ownership and statement from the CBC Asset Management Team that they are prepared for the cost of ownership.

National Planning Policy Framework

Requires that Strategic Planning takes plan before development.

11. Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) plans should positively seek opportunities to meet the development needs of **their area**, and be sufficiently flexible to adapt to **rapid change**;

The developments within Leckhampton are defined in the JCS by Plan A7 which covers the whole of the Southern area of Cheltenham. However, current strategic planning strategy only covers the developments around the planned cyber park. If the 400 Leckhampton Houses are to be included, then the **Strategic Plans** must cover the area of Leckhampton.

All development should be employment led; delivery of housing must be in tandem with employment development. What employment area is targeted with these 400 houses in mind? Until that is defined you cannot plan the transport routes.

Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of sustainable transport modes.

If the “400 house” employment objectives include the “Cyber Park” There are no cross-town bus links to Cyber park, or railway station. The sustainable route via Up Hatherley is “muddled” and incomplete.

If the employment target is elsewhere. Currently, the Transport plan does not include any plans for South Cheltenham (A46) and there are currently no “Sustainable routes” through Leckhampton. (See Footnote)

Land has been safeguarded for a Park and Ride at Brockworth, but no Strategic Plans are available for the (A46) corridor and no land has been safeguarded to create the sustainable links require to make a Park and Ride work. No land has been identified for any new relief roads or cycle track or bus tramways.

High quality public transport facilities and connections within and adjacent to the site. No plan for Leckhampton and Warden Hill, no cross-town routes or to transport links. “High quality” of routes is defined by GCC. See footnote¹

Safe, easy and convenient pedestrian and cycle links within the site, to key centres and with neighbouring existing development and the wider green infrastructure network; No plan for Leckhampton and Warden Hill and there are no “High Quality” links to key centres.

The acceptance by Cheltenham Borough Council of the 400 houses needs comprehensive masterplan and development strategy for the Strategic Allocation, **A master plan is required for Leckhampton and Warden Hill. Set within the context of the safeguarded land at West Cheltenham, which includes’ the need for “Social and demographic services” for some 2600 new residents** in area A7. The plan needs to be mindful of the massive developments at Brockworth and Shurdington thus strategic JCS is required.

¹ Note: Roads, Cycle routes and footpath must comply with [Manual for Gloucestershire streets - Highways](#)

The NPPF references.

157. All plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change so as to avoid, where possible, flood risk to people and property.

They should do this, and manage any residual risk, by:

a) applying the sequential test and then, if necessary, the exception test as set out below;

b) safeguarding land from development that is required, or likely to be required, for current or future flood management.

The land to the East of the A46 is a source of the River Severn. Any development of the land runs the risk of changing the course of the river. Whilst the SuDs plans for each site consider the rainfall on the site and may individually manage the water from those sites. It **does not** consider the above and below ground flows of the river. Any development running North South will act as a dam. Thus, to mitigate flooding including that required to mitigate global warming land should be safeguarded on the land adjacent to the A46. (Which is the land currently earmarked for development.)

The Planning Approval for each of the development must include a management plan for the Lifetime of the SuDs system. The developers have a limited plan. But the CBC has no policy and there is not legal requirement for Severn and Trent to take them on and they currently do not. So, a **strategic plan** is required for the Maintenance of the SuDs.

Change:

The area A7 and its associated objectives do not align, leaving no objective strategies for Leckhampton 400 House and the A46 corridor. The addition, of Leckhampton School has further complicated the challenges. The NPPF requires that there be strategic plans for the development area

It particular:

- Social Development - (Primary Care & Commissioning Services has a new Leckhampton Surgery in its plan where is this in The Strategic Plan?), Sports and Leisure? See Annex A
- Transport
- Flooding

Given that the NPPF requires that Plans must be subject **to rapid change** and the LPA can change them I would be **in favour** of this development if such plans were in place. However, it **should not** get planning approval because the area needs to be safeguarded for future SuDs requirements.

NPPF. The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. **Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.** I would take the view that given the area of the 400 houses is not defined and there are not strategic policies in place the 400 houses be removed from the allocation until the various strategies and safeguarding takes place as recommended by Inspector Ord.

The need for rapid change of plan. COVID 19 and associated lockdowns have and will cause a massive shift in emphasis:

- The need and added importance of Green space.
- The nature of traveling to work and the need for infrastructure to support that. [Coronavirus and the latest indicators for the UK economy and society - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/economy/banking-and-finance/articles/coronavirus-and-the-latest-indicators-for-the-uk-economy-and-society)
- Working from home.

If the 400 houses are removed there remains a need for strategic planning in particular flooding.

I would like to add for the record that local authorities and lockdown have hampered the collection of evidence on which to present a fully objective case.

Annex A

Demographic Chart for 1100 houses (does not include Shurdington and Badgeworth etc.)

Age	2018 UK	Number of Houses	People per House	Total
less than 19	23.00%	1100	2.4	608
19-64	57.00%	1100	2.4	1505
over 64	20.00%	1100	2.4	528
				2641

Services	WFTA Percentage	WFTA Population	Local People
Doctors (NHS)	100.00%	2641	2641
Dentist (NHS)	50.00%	2641	1321
Pharmacy	80.00%	2641	2113
Childcare	10.00%	2641	265
Infant School	20.00%	2641	529
Primary School	35.00%	2641	925
Secondary School	30.00%	2641	793
Special needs	5.00%	2641	133
Care Homes	10.00%	2641	265
Emergency Services	100.00%	2641	2641
Multi faith pastoral care	40.00%	2641	1057
Social Services	10.00%	2641	265
Leisure (public inc swimming)	50.00%	2641	1321
Recycling facilities	100%	2641	2641

WFTA (Wet finger in the air)

[Inspector Ord's report findings](#)

103. I indicated in my Preliminary Findings, that I was minded to find both of these allocations sound, at least in part. This remains my view for North West Cheltenham, albeit with some reduction in housing numbers. With respect to Leckhampton, I take the view that the housing numbers should be substantially reduced, bringing it below the JCS threshold for strategic allocation within the JCS. I am therefore recommending its removal from the JCS. I shall now consider each proposed allocation in turn.

100 Shurdington Road
Cheltenham
Cheltenham Borough Council
Planning Dept.
PO Box 12



Planning Application 100 20/01758/FUL -
350 Homes at Shurdington Road, Chelt.

I object to the above planning App:

1. Traffic on the Shurdington Road is already nose to tail at times, what with the New School the traffic will only increase, at the present time it's very very difficult to get across the road from 100, Shurdington RD.
2. The maximum no of New Homes was 200, now it's 350 (what).
3. The countryside will be sliced to bits the Badgers, Deer which visit us weekly will all be destroyed.
4. Floods will add to the already very wet areas, more houses will only increase This -

(2)

5. Toucan Crossing outside 104 Shurdington Road, will only add to traffic and pollution.

Please give the application your full consideration. Thank you



100. Shurdington Road,
GL53 0JH.

7/1/21.

100 Shurdington Road
Cheltenham
GL53 0JH.
Cheltenham Borough Council - Cheltenham
Planning Dept.
PO Box 12



Planning Application 100 20/01788/FUL -
350. Homes at Shurdington Road, Chelt.

I object to the above planning App.

1. Traffic on the Shurdington Road is already nose to tail at times, what with the New School the traffic will only increase, at the present time its very very difficult to get across the road from 100. Shurdington RD.
2. The maximum no of New Homes was 200, now its 350 (what).
- 3 The countryside will be sliced to bits the Badgers, Deers which visit us weekly will all be destroyed
- 4 Floods will add to the already very wet areas, more houses will only increase This -

(2)

5. Toucan Crossing outside 104 Shurlyb Road, will only add to traffic and pollution.

Please give the application your full consideration. Thank you

100. Shurlyb Road.
QL53 0JH.

7/1/21.

To
Mrs MICHELLE PAYNE,
CHELTENHAM BOROUGH COUNCIL
PLANNING DEPT,
CHELT, GLOS,
GL50 1PP.

①

From:

PLANNING
Rec'd 11 JAN 2021
SERVICES

102 SHURDINGTON Rd
CHELTENHAM
GLOS
GL53 0JH

9th JANUARY 2021.

RE: FORMAL OBJECTION TO CHELTENHAM BOROUGH COUNCIL OVER P/A NO 20/1788/FUL

With reference to the summary application of 20/1788/FUL,
I live in what I would call a small Hamlet off
the Shurdington Rd, which ultimately will be in the
front line of this proposed development.

Mrs Payne, at the risk of being accused of
Nimbyism I have written this letter more out of a
sense of mutual service. As you are aware, being
a Planning Officer, life consists of mutual service which
is something I've always tried to believe. Sadly and
regrettably this world seems to be coming a Walt Disney
World in many ways.

If memory serves me right I can recall the original
application for this proposed development was for
200 homes, Now its 350 homes, to be built.

Never mind Walt Disney here! "The Sorcerer's
Apprentice" springs to my mind when I consider this.
As you can imagine there's not just a few
people out here that feel they are labouring under
a sense of injustice. In truth none likes to be
duped and without reservation I say we have been
duped. I hear the words "relieving capacity" (sic)
being uttered and know full well this is just a
"well-meant" gloss for the Developers intentions.

(2)

Mrs. Payne I can sympathise with the awkwardness of your decision makings when you are confronted with so many formal objections to planning applications but years ago when I was studying at Technic University I can remember with stark clarity my Tutor telling me that a basic rule of war and life is that collective defence protects the individual. Single defence doesn't.

So... on this chord I would like to continue with my letter of objection. I will disregard all the most obvious nightmares ie increased loading on services and infrastructures, congested traffic and gridlocks, the destruction of open land and the one that puzzles me the most. A totally unnecessary Toucan Crossing.

A Toucan crossing that's going to be erected midway between 2 traffic controlled pedestrian crossings. Why? Why will this be needed? Is it to create more traffic and pedestrian problems? Please tell me.

Anyway.... getting back to the defence theme I have to say all my neighbours are fine and I like them fine. I know instinctively that the intended erection of a Toucan Crossing right outside one of my neighbours property will be profoundly unnecessary and disturbing to say the least.

I could say it's not my problem because I won't hear it when the chimes go off

③
to cross the road; this is because I'm deaf!
I do know one thing despite the fact I won't
hear the wretched chime, my poor neighbours
are going to wonder if there's in one of those
awful Supermarkets with those hideous till
chimes.

Regardless of the sudden, revealed disapproval of
this proposed Toucan Crossing, I initially and
selfishly reasoned that it would benefit myself
and my neighbours in the respect of getting into the
main traffic flow on the Shurdington Road.

Mrs. Payne you have to understand that trying
to negotiate entrances into Shurdington Rd traffic
there are times when it's like "Running the Gauntlet"

But, here is the flip side of the coin.... I
quickly realized the prospect of the incidents of
accidents and "light jumping" will increase considerably
simply because of the short run of road between
one set of lights to the next i.e. The Toucan Crossing.

You must forgive me if this proximity seems
endless but if my main objection to this planning
application appears only to be a "molehill" there
seems yet to be a mountain of principles behind it.

It's infallible I have to admit in reason to
a large part of development, because one has
to accept it as so called progress.

Every time I drive past a school that's

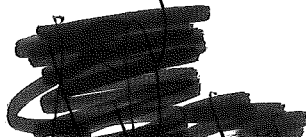
(4)

Exhausting its pupils you know full well at some stage they are all going to want a house, a car, television, ~~press~~ mobiles etc, etc. Every one of them

So... Mrs. Payne, every now and then a little transient gleam of sunshine manages to pierce the gloom of Joe Public's life.

This happens when Planning Officers listen to objections to developers that want to heap a little more misery onto our narrow shoulders, and refuse to embellish a joke.

However, or whatever, I expect no redress like a lot of us out here; but, perhaps the satisfaction of here expressing my case. Finally Mrs Payne. I can understand we have to have developers and their methods of Developing might be justified; but, and I mean but, never ever the manner of it!!

Yours Very sincerely


(P.S. I apologize for any spelling mistakes and jumping from one subject to another.
I only had 1 hour to write this)
34D.



From:
Sent: 06 January 2021 17:06
To: Internet - Planning Comments
Cc: Michelle Payne
Subject: Planning Application 20/01788/FUL - 350 homes Shurdington Road, Cheltenham - Objection

For Attention of Miss Michelle Payne (Planning Officer)

1. I make the following comments as a "**STRONG OBJECTION**" to the above planning application and we feel there are many very important issues to consider.

2. This application does cause my wife and I and my neighbours some Major Concerns. No 106 is right alongside the new site. Many of us are retired and living in Bungalows and it is fair to say that we have a daily experience of the current traffic problems (pollution etc) and ask ourselves "*how can it be allowed to get any worse?*". There are also Objections on the CBC planning website from nearby Residents on the Merestones Estate, whose homes would back onto the proposed new development.

3. SUMMARY of THE ISSUES OF CONCERN (OBJECTIONS) ABOUT THIS PLANNING APPLICATION:

- a. The Siting of a new Toucan Crossing right outside the front of my bungalow home** allowing a full view into my front garden, lounge and kitchen. This is in addition to the obvious noise, pollution, breach of privacy and security risk, which would result. There are also similar Objections from the Merestones Estate Residents, whose homes would back onto this new Toucan Crossing.
- b. Excess Traffic on Shurdington Rd - associated current dangers and pollution etc.**
- c. Serious Flooding Risks.**
- d. Closeness of the new 350 homes to existing residents.**
- e. The proposed 350 Homes ignores recent JCS. Local Plan decisions**, limiting the numbers of new houses to 200 on this location.

I understand my neighbours will also be making their own similar important comments.

4. DETAILS of OUR CONCERNS

CONCERN A. THE SITING OF A NEW TOUCAN CROSSING RIGHT OUTSIDE MY HOME.

I feel it is important when you are considering this application, that you have a full understanding of the "**recent history**" about the precise site of this current proposed Crossing - which I summarise below.

It featured in the 2013/15 Bovis/Miller 650 Homes Application/Appeal, when there was an intention to site a new BUS STOP AND LAY BY right outside the front of my bungalow home. This raised major local concerns and there was also support from our MP, Parish and Borough Councillors (Leckhampton and Park wards) - **against these specific plans.**

It was during the Appeal hearing that the Applicant - with the agreement of Cheltenham Borough Council and Glo'shire County Council Highways - withdrew this aspect of their case. (There was also Secretary of State involvement)

Our Objections at that earlier date were mainly built on the "Pollution aspects at the location from fumes, noise, light and an invasion of privacy and also an increased risk of Security problems - this being some of our major concerns today in 2021 on this 350 homes application.

Regarding this 2020 Miller Homes Application - There has been a public consultation process, including liaison with local councillors and also my verbal and written correspondence with Miller Homes Senior Planning Directors - which has included a specific reference to the new proposed crossing outside the front of my home.

Miller Homes are aware of the earlier issues/history associated with the 2013/15 Planning Application/Appeal and despite our verbal and written opposition about the the new Toucan crossing - it still remains a feature of their 2020 planning application.

Miller Homes' initial plans in the 2019 public consultation process were for Crossings on both sides of their North East access point - the one being right outside the front of my home and the other crossing near Silverthorne Close, a short distance away.

They later withdrew this Silverthorne Close Crossing. The 2020 Miller Application is however now stating in one of their submitted documents, that this Silverthorne Close crossing is still to be part of Miller USEAGE, by virtue of the nearby "Bovis - now Kendrick Homes " planning application.

Miller Homes in my opinion have FAILED to take any material action about "my toucan crossing" and it still UNNECESSARILY remains part of their current application.

To the best of my understanding - there are to be a total of 4 Crossings along Shurdington Road due to the new Senior School application, the Bovis/Kendrick Homes application and this 2020 Miller Homes application.

The Bovis/Kendrick Homes site is right alongside the Miller North East access point on Shurdington Road and their Crossing is close to Silverthorne Close, where "interestingly" Miller initially had their own earlier plans for a crossing.

I FEEL IT IS IMPORTANT TO DRAW YOUR ATTENTION TO 3 DOCUMENTS, WHICH FORM PART OF THIS CURRENT APPLICATION:

No 1 Document - "Transport appendices part 2 figures and drawings part 2" - which clearly shows that there are planned to be 4 separate crossings on Shurdington Rd - one being upgraded near Kidnappers Lane and 3 new ones either side of the Woodlands Road/Warden Hill turn. **Significantly there are plans therefore for 2 crossings quite close to each other - the one being outside my home and the other near Silverthorne Close.**

No 2 Document - "Transport Assessment Part 1" - paras 6.4.6 and 6.4.7. Mention is made that "the new proposed Toucan crossing outside my home (104 Shurdington Rd) is considered to be the "Optimum Location". Mention is also made that "discussions are ongoing with Gloucestershire County Council Highways Development Management Team (GCC HDM) about the nature of the signals and minimising impacts on local residents etc". **There is a reference to Miller Homes "also using the new proposed BOVIS/KENDRICK crossing at nearby Silverthorne Close".**

No 3 Document - "Acoustic Design Statement".

This document refers to Pollution in its widest sense (including loss of privacy and potential disturbance from noise etc and is a "feature" of Local Planning Policy.

In November 2020 I started written correspondence with GCC HDM (Glo'shire County Council Highways Development Management team) to address this specific issue of the Toucan crossing siting. I believe there are others similarly writing to GCC HDM.

Apart from a formal acknowledgement - no further information has been heard - other than GCC Highways making comments dated 21.12.20 on the CBC Planning site that **"they are now deferring their comments for further consideration/discussions on Policies and also relating to the new Secondary school Highway works".**

IMPORTANT TO NOTE

There is in my opinion a very clear indication that Miller Homes do "only partially recognise" the Obvious Breach of Privacy and Pollution by poor air, noise, light etc. **I do NOT consider however that their actions are sufficient to address our significant worries in this regard.**

The only way of addressing our concerns is to completely remove this 104 toucan crossing altogether and for Miller to easily rely on the other one nearby at Silverthorne Close, especially as Miller "in their own Document" accept they will be using the new Bovis crossing at nearby Silverthorne Close.

CONCERN B

EXCESS TRAFFIC

Over recent years I have submitted photos of the "traffic delays near our home at various times of the day" for the attention of JCS, Cheltenham Local Plan and various earlier Planning Applications. It is also to my knowledge that there have been delays in Public Transport and Emergency vehicles due to traffic hold ups.

The question has to be asked - has there been any Appreciation of the 1,500 homes being built in the nearby Brockworth area and the recent developments planned and being built on this side of Cheltenham ?

There has also already been formal recognition that traffic in this area was "**severe**" - so the 350 Miller development and the new secondary school and the other mentioned developments will only make the Traffic situation "**even more Severe**".

"Pollution in its widest sense" is a major concern, as has been previously mentioned.

CONCERN C

The issue of **FLOODS** has been widely commented upon by local residents over the years and full notice should be taken

of those who have experienced the problems, together with the need to adhere to National and Local Policies etc. It should be appreciated that Floods now appear to be a regular problem for residents in the Shurdington Road, Merestones and Warden Hill areas.

An Extra 350 homes "without proper proven flood plans" in my opinion can only make matters worse.

CONCERNS D and E

The unnecessary **CLOSENESS of 350 new houses** to existing dwellings (bungalows) - an obvious statement.

We are very disappointed that despite the the recent formal assurances of limiting the max no of houses to 200, this will now be significantly increased to 350.

FINAL COMMENTS

1. You will note that one of our **biggest personal concerns** relates to the proposed Crossing at the front of my bungalow home and we feel there is sufficient detail in this email to justify its removal from the Application.

2. There has also been **strong official comment** in recent years about the "**severe traffic problems**" - so we have to ask "*what has now changed in January 2021 to allow this Application to go ahead ?*"

This email is sent to the best of my knowledge and understanding and I ask that you give this email your full consideration.

Thanks

104 Shurdington Rd
Cheltenham
GL53 0JH
07970 029482

MyRef 1700-060121



Objection to the Miller Homes application for

Land at Shurdington Road, Leckhampton

Reference 20/01788/FUL

Clean Air Cheltenham
www.cleanaircheltenham.org

30 November 2020

SUMMARY

Clean Air Cheltenham objects to the planning application from Miller Homes for Land at Shurdington Road, planning application reference 20/01788/FUL.

Our submission clearly demonstrates that the Air Quality Assessment (AQA) report provided by RPS to accompany this planning application is so deficient that the air quality impact of the proposed development has not been properly assessed.

Failure to properly assess air quality impact makes any decision on the planning application liable to legal challenge.

The application must therefore be rejected, and Miller Homes instructed to **prepare an AQA to a professional standard.**

In summary, the grounds for our objection are:

- 1. The majority of the location of receptor sites are identified incorrectly – this invalidates the dispersion modelling on which the AQA rests**
- 2. Incorrect data been used to check the dispersion modelling of NO₂. These obvious errors again invalidate the model verification on which the AQA rests.**
- 3. The AQA fails to follow the DEFRA guidance in their Local Air Quality Management Technical Guidance (LAQM.TG16) regarding dispersion modelling of emissions.**
- 4. The AQA does not 'sense check' the modelled NO₂ results against actual measurements of NO₂.**

Introduction and background

Clean Air Cheltenham began reviewing the Miller Homes AQA – and we quickly identified some serious flaws: what appear to be significant data handling errors, as well as a failure to follow DEFRA guidelines on how air quality assessments should be performed. We have only looked so far at modelling of Nitrogen Dioxide from traffic, but in our view, the number of errors in this area cast doubt on the whole of the report.

If the data handling with regard to NO₂ and the modelled receptor sites contains the type of errors described later, it is highly likely that there are equally significant mistakes made in the modelling of dust pollution during the construction phase as well.

We would also highlight that DEFRA recommend that assessments of air quality should use actual measurement wherever possible as a starting point – rather than relying entirely on dispersion modelling.

Leckhampton with Warden Hill Parish Council monitors both Nitrogen Dioxide and particulate matter across the local area close to the proposed site. Cheltenham Borough Council has also recently installed new AQ Mesh Pods at 8 sites across the town, which provide further data on particulates, and also measure NO₂ in real-time, rather than the average monthly readings provided by diffusion tube monitors.

Based on the evidence of diffusion tube monitoring over the last 2 years, Clean Air Cheltenham believes there is a significant risk the additional traffic and congestion from the Miller Homes development, the Bovis and Hitchens developments, combined with the new secondary school could lead to one location exceeding the annual mean legal limit for NO₂.

That location is the junction of Shurdington Road and Moorend Park Road.

After presenting supporting evidence for our 4 points of objection, we conclude with a section making suggestions for how the Air Quality Assessment can be re-done to a professional standard, using recent actual data readings of both NO₂ and particulates. There is a useful amount of actual monitoring data available from both the Parish Council, and Cheltenham Borough Council, which has not been used in the RPS report.

Objection 1 The majority of the locations of receptor sites been incorrectly identified.

Table 3.4 in the RPS report lists the location of 'modelled receptor sites'.

It appears that some cut and pasting in Excel has gone wrong. The table overleaf shows the mix-up that seems to have happened.

Firstly, 22 out of 27 of the locations have the incorrect co-ordinates given.
18 of these 22 have been transposed down 4 rows (see entries labelled in pink overleaf)

There are **31** receptor sites listed on **Figure 1** of the RPS report, but only **27** in **Table 3.4** of the RPS report.

The 4 'extra' sites on Figure 1 (179 Bath Road, 56 Church Road, Kidnappers lane, 97 Shurdington Road) have co-ordinates given in Table 3.4, but these co-ordinates are identified as other sites.

There are **4** sites in **Table 3.4** (Francis Street, Montpellier Terrace, Gloucester Road, Miserden Road) which do not have any matching co-ordinates anywhere in the table.
(These 8 sites are shown in white cells in the table overleaf.)

And there are 5 sites (shown in green cells overleaf) where the location description in Table 3.4 matches the co-ordinates.

(The 4 extra sites happen to be the 4 sites where RPS have used actual CBC data readings to check the dispersion modelling... so what has probably happened is that co-ordinates were pasted in at the last minute to Table 3.4, but in a way which caused all the errors.)

These mistakes invalidate all the modelling of NO₂ and particulates.

Given the confusion over co-ordinates and location descriptions in Table 3.4, the planning committee cannot be sure if the correct traffic data has been used for each site.

RPS Air Quality Assessment: Miller Homes

Cross referencing named locations with x/y co-ordinates given

ID	Location description: RPS Table 3.4	X (Easting)	Y (Northing)	Actual site for these x, y, co-ordinates
1	Leckhampton Lane 1	394614	221153	Bath Road
2	Leckhampton Lane 2	394577	219728	56 Church Road (just west of Hall Rd)
3	Kidnappers Lane South	393525	220187	Shurdington Rd (opp Kidnappers Lane)
4	Kidnappers Lane South	394057	220607	Shurdington Rd (Between Highwood Ave and Moorend Park Rd)
5	Church Road West 1	392469	218806	Leckhampton Lane (Shurdington Rd end)
6	Church Road West 2	392483	218760	Leckhampton Lane (Shurdington Rd end)
7	Church Road East 1	394342	219540	Kidnappers Lane (Church Rd end)
8	Church Road East 2	394364	219570	Church Rd (close to Kidnappers Lane)
9	Farm Lane 1	394202	219441	Church Road (opposite the church)
10	Farm Lane 2	394052	219343	Church Road (opposite industrial units)
11	Kidnappers Lane North	394403	219589	Church Road (opposite Collum End Rise)
12	Shurdington Road 1	394413	219552	Church Road (adjacent to Collum End Rise)
13	Shurdington Road 2	393763	219473	Farm Lane (opposite Redrow development)
14	Leckhampton Church of England School	393668	219659	Farm Lane (northern end of Redrow development)
15	Tamarisk Close	393536	220159	Kidnappers Lane (junction with Shurdington Road)
16	Rothleigh	393378	220066	Shurdington Road (close to Farmfield Rd junction)
17	Farm Lane	393414	220045	Shurdington Road (close to Farmfield Rd junction)
18	Whitelands Lane	394580	219810	Leckhampton Church of England School
19	Francis Street	393080	219830	Tamarisk Close (Shurdington Rd/Up Hatherley Way roundabout)
20	Montpellier Terrace	392460	220130	Rothleigh/Up Hatherley Way
21	Gloucester Road	391906	218260	Shurdington Road (south, towards Badgeworth Lane)
22	Miserden Road	391401	217668	Whitelands Lane (Shurdington Rd south)
23	Bournside School and Sixth Form	393130	220980	Bournside School and Sixth Form
24	St Stephens	393922	221577	St Stephens Rd (close to Andover Rd/Lansdown Rd)
25	Tivoli Street	394227	221463	Tivoli Road/Andover Rd junction
26	Hatherley Road	393747	221607	Hatherley Road
27	Park Place	394355	221487	Park Place (close to Suffolk Rd)

Locations on RPS Figure 1, matched to co-ordinates given
179 Bath Road (given on Figure 1 but not listed in Table 3.4)
56 Church Road (given on Figure 1 but not listed in Table 3.4)
Kidnappers Lane (given on Figure 1 but not listed in Table 3.4)
97 Shurdington Road (given on Figure 1, but not listed in Table 3.4)
Leckhampton Lane 1
Leckhampton Lane 2
Kidnappers Lane South
Kidnappers Lane South
Church Road West 1
Church Road West 2
Church Road East 1
Church Road East 2
Farm Lane 1
Farm Lane 2
Kidnappers Lane North
Shurdington Road 1
Shurdington Road 2
Leckhampton Church of England School
Tamarisk Close
Rothleigh
Farm Lane
Whitelands Lane
Bournside School and Sixth Form
St Stephens
Tivoli Street
Hatherley Road
Park Place

Objection 2 Incorrect data has been used to check the dispersion modelling of NO₂.

The RPS report (following the approach described by DEFRA), has attempted to check the modelled results against some locations where actual pollution readings are available. This process is known as 'model verification'.

RPS chose 4 sites where CBC has used diffusion tube monitoring of NO₂ in the years 2013 to 2015.

We discuss in the next section the deficiencies in choosing only 4 sites from a period 8 to 5 years ago. But the major concern is that the RPS report has again mixed up the data, as shown in the table below.

RPS Air Quality Assessment: Miller Homes

Model verification: comparing figures given in RPS Table B1 with CBC data

Measured Annual Mean NO ₂ concentrations (ug/m ³)				
	2013	2014	2015	2016
179 Bath Road				
RPS Table B1	26.2	20.2	20.5	–
CBC correct figures	31.7	31.5	31.2	30.5
56 Church Road				
RPS Table B1	27.9	25.2	25.3	–
CBC correct figures	26.2	20.2	20.5	–
Kidnappers Lane				
RPS Table B1	33.8	30.3	29.5	–
CBC correct figures	27.9	25.2	25.3	–
97 Shurdington Road				
RPS Table B1	31.7	31.5	31.2	30.5
CBC correct figures	33.8	30.3	29.5	–

What has happened is that RPS have mixed up all 4 locations.

- CBC data for 56 Church Road has been used incorrectly for 179 Bath Road
- CBC data for Kidnappers Lane has been used incorrectly for 56 Church Road
- CBC data for 97 Shurdington Road has been used incorrectly for Kidnappers Lane
- CBC data for 179 Bath Road has been used incorrectly for 97 Shurdington Road.

These mistakes in model verification invalidate all the modelling of NO₂ and particulates.

Objection 3 The AQA fails to follow the DEFRA guidance in LAQM.TG16 regarding dispersion modelling of emissions.

Current DEFRA guidance to Local Authorities on how to manage local air quality is given in a document known as LAQM.TG(16).

The RPS report gives insufficient detail to check whether they have accurately followed these guidelines for dispersion modelling.

But there are at least three main areas where the RPS report does not meet DEFRA's validation criteria.

3a: The model verification requirements regarding statistical confidence have not been applied.

DEFRA insists that there must be a '*comparison of modelled results versus monitoring results*' at relevant locations. (Section 7.510, LAQM.TG16).

DEFRA say there should be a statistical check of the degree of confidence that can be given to the modelled results. The recommended statistical check is the Root Mean Square Error. (RMSE) This is a measure of how much error there is between the modelled results and actual results.

Table B2 gives the comparison of NO_x reading for 4 modelled sites and actual monitor readings for the same 4 sites. *RPS have not calculated the RMSE.* We have reproduced this table below:

RPS Table B2: Comparison of Monitored and Modelled Annual-mean Road NO_x contribution (ug/m³)

	Annual mean Road NO _x Contribution (ug/m ³)	
	Monitored	Modelled
179 Bath Road	17.1	11.8
56 Church Road	26.9	8.0
Kidnappers Lane	35.8	17.9
97 Shurdington Road	39.6	12.2

The RMSE for this data-set is **19.08**.

This means any modelled result for a given receptor site is likely to be out by around 19 ug/m³ NO_x

Another way of looking at it is to say that, based on these 4 comparisons, any modelled result is likely to be out by between and 106% and 238%. No wonder RPS didn't calculate the RMSE!

This very high RMSE, based on a comparison between only 4 pairs of variables, means that there is no correlation at all between the model results and actual readings. The model is therefore so inaccurate as to be of no use.

We know from the previous section that one reason for this is that RPS mixed up the data for each of the 4 comparison sites. It appears that they have effectively randomised the input data, which gives the

entirely expected result that there is no correlation between the model and reality... but then ploughed on regardless!

It is also worth remarking that nowhere near enough comparisons have been undertaken. CBC have around 30 to 40 diffusion tube sites in addition to the 12 local ones operated by the Parish Council. Comparisons should have been made at around 20 sites in order to be able to compare the model with 'real-life' with statistical confidence.

Bureau Veritas recently conducted a similar modelling exercise for CBC around the city centre, and performed comparison at 16 locations. Using only 4 sites to compare the model with actual readings is highly unlikely to give an acceptable level of statistical confidence. It is both surprising and worrying that RPS do not appear to appreciate this.

3b: The approved modelling process has not been followed.

Another reason for this very high level of uncertainty about the modelled results is that there are any number of complex effects that must be taken into account – ranging from traffic patterns, estimates of speed, fleet composition, congestion, street canyon effects, multiple traffic lanes, road gradients, and so on. There is huge potential for a series of 'slightly wrong' assumptions to coalesce into wild inaccuracy.

Because of this, the LAQM guide states that if there is a discrepancy between modelled results and actual results, an adjustment factor may be applied (Section 7.513), but *'before adjustment of a model is applied... the model set-up parameters and input data should be checked... in order to reduce the uncertainties'*. (emphasis added, from Section 7.514).

RPS do not appear to have followed this instruction.

3c: The guidelines on acceptable levels of error have not been followed.

DEFRA Technical Guidance on acceptable levels of error between modelled and actual results (section 7.542 of LAQM.TG16) says that:

"If the RMSE values are higher than $\pm 25\%$ of the objective being assessed, it is recommended that the model inputs and verification should be revisited in order to make improvements. For example, if the model predictions are for the annual mean NO_2 objective of $40\mu\text{g}/\text{m}^3$, if an RMSE of $10\mu\text{g}/\text{m}^3$ or above is determined for a model, the local authority would be advised to revisit the model parameters and model verification. Ideally an RMSE within 10% of the air quality objective would be derived, which equates to $4\mu\text{g}/\text{m}^3$ for the annual average NO_2 objective."

DEFRA recommends that the RMSE check is performed on the 'road contribution NO_x ' contribution. The 'road NO_x ' is then converted to a NO_2 figure, which is then added to the background NO_2 level. The conversion factors can vary depending on distance from the emission source etc, so the error level in NO_x does not directly translate to the same error level in the final estimate of NO_2 . But there can be little confidence that the NO_2 RMSE would be within the 25% limit, based on the variance demonstrated, and the very limited number of comparison sites.

The error levels in the RPS modelling are far higher than those stipulated in DEFRA's guidance document LAQM.TG16.

Objection 4 The AQA fails to 'sense check' the modelled results.

Reading the RPS report, it quickly became obvious that the modelling simply didn't make sense. Further investigation uncovered the 'garbage in-garbage out' errors described in Objections 1 and 2 above.

How did RPS fail to see the obvious red flags that were apparent to us on a cursory first read?

For example:

4a: Why do the modelled pollution results show no congestion effect?

It is very well known that air pollution increases significantly with idling and congestion. To give an example of this 'congestion effect', Parish Council NO₂ data (2019, annual mean level) from Shurdington Road at the junction with Kidnappers Lane was **19 ug/m³**. The annual mean level 600m away at the junction of Shurdington Road and Moorend Park Road was **33 ug/m³**.

The volume of traffic at these two points is very similar – *but there is a near 75% increase in NO₂ levels at the Moorend Park Road junction due to congestion and idling that occurs at the traffic lights here.*

The link between congestion and air pollution is widely understood and reported – hence the use of congestion charging in major cities as one of the most effective ways of reducing air pollution.

There will clearly be more congestion and idling in Shurdington Road. The i-Transport report (submitted as part of the planning application) predicts an additional 200 car journeys in each of the am and pm peak hours. The secondary school is likely to generate a similar or greater number; and the Bovis and Hitchens developments are anticipated to generate a further 20 car journeys at the am and pm peak hours. The introduction of pedestrian crossings and a roundabout in the Kidnappers Lane area of Shurdington Road will have the effect of slowing traffic down... at a time when traffic volumes in the am and pm peaks hours are predicted to increase by around 35%.

Yet all the NO₂ predictions in the RPS report along Shurdington Road under Scenario 1 (2022, no development), Scenario 2 (2022 with development) and Scenario 3 (2026, with development and Leckhampton Secondary School fully occupied) show very little variance. (The predicted pollution levels even go down slightly from 2022 to 2026.)

In other words, RPS are predicting that there will be no congestion, and that a significant increase in traffic levels will not result in any rise in air pollution.

These predictions are simply not credible.

4b: Why are no results shown for the most important receptor site?

Why is the receptor site on Figure 1 (97 Shurdington Road), which is closest to the critical traffic pinch point at the Moorend Park Road junction, not listed in Table 3.4 of Receptor locations? The receptor location was used in the model verification process (see Appendix B of the RPS report), so must have been modelled?

4c: Why are the modelled pollution levels in the '2022 no development' scenario so much lower than current actual readings?

Table 6.1 in the RPS report gives the modelled NO₂ levels for Scenario 1 (2022, without development). The highest level for any site in the Shurdington Road area is predicted to be **20.5 ug/m³**.

However, the two sites given in Table B1 – giving actual CBC readings for 97 Shurdington Road and Kidnappers Lane – show levels around **30 ug/m³**. (These readings are from the period 2013, 2014, 2015.)

The Department of Transport Traffic Count figures for count point 77984 (close to 97 Shurdington Road) show a 5% increase in traffic between 2013 and 2019.

The Parish Council NO₂ reading for this area of Shurdington Road in 2019 was **33.4 ug/m³**. This shows a correlation with the increase in traffic estimated by the DoT between 2013 and 2019. It is possible that levels of NO₂ will decline slightly in future due to improved emission standards on cars, and substitution of diesel vehicles by petrol/hybrid/electric vehicles – but there is no evidence of this happening yet. For example, towns like Cheltenham and Oxford and many other all have experienced a small increase in annual NO₂ levels in 2019 compared to 2018.

For these reasons, alarm bells should have rung at RPS when the modelled results show so much variance from actual readings.

Recommendations for re-doing the Air Quality Assessment to a professional standard

It is hard to have confidence in RPS's Air Quality Assessment. Basic data handling errors have not been picked up by the senior staff meant to check the report, and the assessment does not meet DEFRA standards.

The first step should therefore be to *appoint a consultancy with more expertise in air quality, and with better attention to accuracy and statistical rigour.*

Dispersion modelling systems are highly complex – if the Air Quality Assessment for this planning application is going to rely to a large extent on dispersion modelling, then:

- the consultants involved must be highly experienced in their use of these systems and understand all the pitfalls and complexities.
- the modelling must use a much larger number of verification sites in order to have statistical validity
- the model must meet DEFRA guidelines on acceptable error (section 7.542 of LAQM.TG16)

But we are keen to see an Air Quality Assessment that:

- takes far more account of actual monitor readings
- looks at the impact of congestion during peak travel times

There are 12 diffusion tube sites (measuring NO₂) in various locations close to the proposed development (see the Leckhampton with Warden Hill Parish Council website for these locations). There are also two particulates monitors that measure PM_{2.5} and PM_{1.0} to reference standards. These are in Leckhampton Road and Church Road. It should be possible to combine the pollution data from these monitors with DEFRA's estimated background level of NO₂, and then use current traffic levels and predicted traffic levels to give much more reliable air quality predictions.

The availability of this data from the local monitors should also lead to improved dispersion modelling done in parallel.

CBC has also installed 8 AQ Mesh Pods at sites around main roads in Cheltenham. These measure both particulates and NO₂ in real-time, and therefore should be able to help enormously with modelling of levels of NO₂ and particulates at peak travel times compared to averaged figures.

We are particularly keen to see congestion modelling at the Shurdington Road/Moorend Park Road junction. This is the most polluted location close to the proposed development. Although the current pollution level does not exceed the 40 ug/m³ annual mean limit, we think *there is a real possibility that the combination of additional traffic and also increased idling/congestion, could cause the legal limit to be breached at this one location.*



Consultation Response to Planning Application

Application Reference	20/01788/FUL
Applicant	Miller Homes
Case Officer	Michelle Payne
Consultation Deadline	08/12/2020
Application Description	
Full planning application for residential development comprising 350 dwellings, open space, cycleways, footpaths, landscaping, access roads and other associated infrastructure	
Land At Shurdington Road Cheltenham Gloucestershire	

Organisation Overview:

Gloucestershire Community Rail Partnership (GCRP) consist of several organisations, volunteers and enterprises across the county seeking to benefit communities through connecting people with and engaging them in local railways and stations. The GCRP engages in a number of conventional 'bottom up' workstreams, such as community outreach, alongside more strategic decisions supporting integrated transport and development proposals.

This includes playing a critical role in organising, conducting and collating datasets to help inform local decision making and taking a proactive role in facilitating a responsive and flexible recovery to Covid 19. The remit extends to stimulating healthy and active lifestyles and reducing emissions through sustainable travel.

GCRP is run by CIC as its executive arm. Jon Harris is the Director responsible for the strategic planning, development and regeneration agenda.

Strategic Aim:

To develop an accredited, sustainable community rail partnership organisation for Gloucestershire that puts the region on the map through effective community engagement, public transport integration, station development activities, enhanced visitor experience and sustainable travel promotion and projects.

Gloucestershire's long-term vision for rail is for more frequent, faster passenger services accessed via modern station facilities that provide gateways to the rest of the country. Rail services will offer people with a choice in the way they travel making local and longer distance trips. The GCRP is an independent voice but aligns its activities with the four key pillars of rail policy and practice:

- Gloucestershire County Council's Local Transport Plan and Rail Strategy
- DfT's Community Rail Strategy objectives
- RSSB's Rail Sustainable Development Principles
- Community Rail Network (CRN) best practice including accreditation criteria

The aims of the GCRP are far broader than looking at rail. As a partnership, there is a real desire to ensure that access to rail plays a part in the development and delivery of integrated transport and land use policy to support various objectives. The GCRP wants to go beyond conventional community rail ambitions by submitting our views on this planning application

Key Aims

1. To contribute positively to the visitor experience and the long term economic sustainability of Gloucestershire
2. To improve accessibility to public transport for all
3. To improve the integration of transport through sustainable modes of transport
4. To increase ridership profile and community involvement at all Gloucestershire's railway stations
5. To provide community insight to shape future proposals for rail investment and services in the County

Key Objectives

1. To engage all stations in Gloucestershire and establish / strengthen Station Adoption groups along the lines through inclusive and participative community consultations. The consultations will identify the issues and challenges at each station and help engage the local community. The outcomes will inform the development of relevant and proactive action plans that will be reviewed and refreshed on a quarterly basis.
2. To link adopted stations with their broad community through facilitation of unique community led projects that address community issues and communicate a sense of place. Publicity will consider county wide connectivity and integrated transport approach to encourage wider connectivity between stations, communities and the locations they serve.
3. To promote Gloucestershire as a sustainable destination nationally and internationally connecting sustainable travel with Gloucestershire's visitor experiences to engage and resonate with visitors. To achieve this we will work in partnership with the county's destination management and marketing organisations to achieve an aligned and coordinated approach.
4. To stimulate stations as local places working proactively with developers and local authorities to ensure that rail facilities are well connected to new development through continuous engagement and consultation with councils and their associated neighbourhood plans. We will work proactively with developers, town and parish and councils and local authorities to ensure that rail facilities are well connected to new housing, employment and leisure development
5. To link stations, communities and visitors through promotional and educational measures, including trails, walks and enhanced destination experiences through maps, education, training and events that celebrate local heritage and improve health and wellbeing.

6. To proactively input into planned improvements to the rail network in Gloucestershire, including new or improved stations, accessibility, bus and sustainable transport integration and community transport schemes.

Overall Alignment

A core objective of the CRTPs work would be to work with local transport authority to meet the long term LTP targets, not just around rail growth, but also around continued use of walking, cycling, bus and community transport modes as stated in the current Local Transport Plan

LTP PI-2: No. Of Peak Hour Vehicle Journeys – Restrict annual growth to 1% per annum

LTP PI-7: Increase use of rail – Increase by 30% from 2015 to 2031

LTP PI-8: Increase use of cycling – Increase by 50% from 2015 to 2031

LTP PI-9: Increase use of bus – Maintain bus passenger numbers in line with reviews

LTP PI-10 Maintain bus passenger access - Maintain access within 45 minutes

LTP PI-13 Reduce levels of traffic derived Nitrogen Dioxide – To reduce transport derived NO2 at each Air Quality Management Areas

LTP PI-14 Reduce per capita transport carbon emissions - 0 tonnes per capita by 2050

Contacts/ Response Authors	
Email	j

Local Policy Context

The proposed residential site sits in a peri urban location towards the south east of Cheltenham Railway Station and south of the main town centre along the A46; a key thoroughfare providing direct access to the A417 and (M5 Junction 11A), the urban extension of Brockworth, Gloucester, and Stroud, via Painswick through the Cotswolds Area of Outstanding Beauty (AONB).

The site forms part of the Policy MD4 site in the Cheltenham Plan (adopted July 2020) which includes a six-form entry secondary school. The secondary school site was granted planning permission on 21 July 2020 (Gloucestershire County Council planning reference 19/0058/CHR3MJ). The residential area is to be split into two parts; an eastern and a western parcel comprising of 175 homes each featuring 40% affordable homes.

The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) provides a key policy backdrop to the development. A thorough examination of local policy and relevance to the proposed site has been undertaken on behalf of Miller Homes (developer) with clear reference made to the following:

JCS Policy INF1: Transport Network and specifically Paragraph 15.5 which states: "Policy INF1 of the JCS sets out transport-related requirements and expectations for development in the Borough. Of particular note is Part One of INF1 which ensures that all proposals improve and encourage access to more sustainable modes of travel. A Travel Plan also forms part of the requirement for a development of this scale and size.

JCS Policy SD4: Requires new development to prioritise movement by sustainable transport modes through design. These policies will form an important part of development proposals in the Borough."

Policy SD4 Design Requirements: Movement and Connectivity. It states that new development should be designed to integrate, where appropriate, with existing development, and prioritise movement by sustainable transport modes, both through the application of legible connections to the wider movement network, and assessment of the hierarchy of transport modes.

The National Planning Policy Framework (NPPF) also sets out matters when considering development proposals across four key paragraphs:

Paragraph 108:

"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users; and
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."

Paragraph 109:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

Paragraph 110:

"Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations."

Paragraph 111:

"All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed."

We believe the Transport Assessment has been sufficiently thorough and extensively researched with strong alignment with local policy and strategy. Particular attention has also been made to the JCS evidence base and the reference made to assessing impacts on the eleven strategic travel corridors, namely Corridor 9: A46 Bath Road (central Cheltenham) to A417 junction.

GCC's preferred mitigation package for Corridor 9 includes:

- Leckhampton Lane - upgrade A46 / Leckhampton Lane priority junction, to include a dedicated right turn from A46 south into Leckhampton Lane (funded through developer contributions);
- Moorend Park Road - A46 Shurdington Road northbound approach to Moorend Park Road – additional highway space for right turning traffic by providing a longer stacking lane (funded through developer contributions);
- Badgeworth Lane - A46 / Badgeworth Lane priority Junction – Signalisation of junction to provide improved access to/from Badgeworth (funded through ad hoc funding opportunities).

Alignment with GCRP Strategy

We feel on a whole that the development scheme and associated commitments to local infrastructure works, on and off site, alongside a detailed travel plan, are sufficient to accept this proposal. However, we do believe that a number of points need to be highlighted and a number of conditions made to meet the expectations and commitments outlined in the proposal and the GCRP Aims & Objectives.

Positive Alignment

There are many positive hard and softer measures proposed as part of the development masterplan and developer contributions to support active travel and increased local permeability and connectivity. The site is strategically positioned on a north south axis between Shurdington Road and the proposed secondary school and the east west axis between Leckhampton Footpath 12 / Merlin Way and Kidnappers Lane. The proposed site layout provides off road footpath / cyclepaths completing the north south and east west pedestrian linkages in the local area.

We believe the site is well positioned to take advantage of principal bus route serving the Shurdington Road, including Service 10 Gold, operated by Stagecoach, which provides a frequency service every 10 minutes to Cheltenham and Gloucester / Lower Tuffley Monday to Saturday and every 30 minutes on a Sunday. The first available service towards Cheltenham leaves the stop at 06:22 and the last return is 23:45. The earliest service for Gloucester leaves at 06:32 and last return journey is at 23:06.

Another Gold Service, 61, also operates frequently along the Cheltenham to Stonehouse alignment via Stroud and would serve as an excellent sustainable and scenic alternative to car-based travel for Swindon/London bound rail users via the Cotswolds AONB. This would be a natural direction of travel for rail users than rail heading into Cheltenham or Gloucester station providing that the route is adequately promoted through the travel planning process.

More importantly, the site is served by Bus service D which provides a connection to Cheltenham Railway Station and Bishop's Cleeve departing Warden Hill bus stops every 30 minutes. This is approximately 850m from the centre of the site but would need to be correctly signposted for residents are the service extended to plug directly in the new site. First services from the stop start at 06:38 to Cheltenham and the last service from the destination is at 22:48. Peak Period frequency is 15 minutes, including over the course of Saturday, with off peak and Sunday services being every 30 minutes on average.

It is noted that pedestrian and cyclists will have the opportunity of accessing Cheltenham town centre by two main routes. The first is via Shurdington Road, the Shurdington Road / Moorend Park Road junction and beyond. The second is via Shurdington Road, Woodlands Road, St Michaels Road, the off-road cycle route linking to Merestones Road and the signed cycle route via The Parks and beyond providing a quieter route towards the town centre . We would welcome the applicants offer to assist in bringing forward improvements to this route and to enter further discussion with GCC and CBC on the matter. This would serve to support access to the railway station from Gloucestershire University Park Campus and ultimately help create smore eamless door to door journeys.

Negative Alignment

We believe that commendable efforts to support sustainable travel are undermined by the scale of car parking capacity provided on site (2.52 spaces per dwelling) and the low-density urban design code that may only lead to exacerbating local car-based movements. Whilst we understand that the development has to be sympathetic to local surroundings and is relatively permeable, there is little to suggest that new residents would opt to travel sustainably. We agree that the site is generally walkable to local neighborhood facilities.

We would request that evidence be provided off how Miller Homes have previously met mode share targets for a development of a similar scale and size and to ensure that the local authority is vigilant and holds the developer to account initially and when assessing monitoring activity. We for example, would not be able to predict the heightened levels of rail travel based on the figures presented due to the uncertainties around travel patterns and future demand to travel. This applies to the interim modal split targets identified by rail for the site:

Baseline: 2.1%
Year One: 2.1%
Year Three: 3.0%
Year Five: 3.5%

The Travel Plan objectives is:

'To reduce the number of vehicle trips generated by the site during the morning peak hour (08:00-09:00) and evening peak (17:00-18:00) by 10.0%. The objective is to achieve this target within five years from first occupation.'

We feel that efforts to reduce car use should, however, be more ambitious considering the window of opportunity presented by the pandemic to reduce travel

demand and increase levels of walking and cycling. Car driver mode share only drops 6.7% to 60.1% for mode share on site. This does not meet local ambitions and the required modal shift required over the next five years for a new development in a strategic position. We do hope that if Travel Plan targets are not met by the end of the monitoring period outlined above, the developer will work with Gloucestershire County Council to identify a strategy and to agree further actions to get the Travel Plan back on track.

We feel much more attention needs to be channeled towards upgrading Shurdington Road (A46) which is part of the National Primary Route Network but also a highly trafficked single carriageway, 7 metres in diameter and with a 40mph speed limit. This road is a potential barrier to movement; both physically and psychologically, especially for cyclists looking to use it for accessing the station and town centre. Better integration with local quiet streets and alternative routing may be useful to promote and improve as part of local works. We do already appreciate the consideration given to desire lines over Shurdington Road.

We would like to see further clarifications made on the ease of access to rail for people with reduced mobilities and disabilities as well as ambulant users as indicated on the design principles for the site. Limited attention has been made to supporting Community Transport operations in this capacity and we would like to see a discussion around a designated car club vehicle being provided on site to develop a greater package of demand responsive options. This is especially pertinent for those who associate with a Protected Characteristic Group (PCG) s no accessible, frequent, direct bus connection that plugs into the proposed site that would serve the station directly. Bus Service D, which allegedly serves the site accordingly to the transport assessment and travel plan stops well short of the 400m recommended walking radius of the proposed site location.

Recommendations/Specific Observations

Walking and Cycling

We are generally satisfied with the level and type of funding commitments and infrastructure measures being proposed as part of the planning application, which would help plug the site into the wider active travel and public transport networks. The following upgrades would benefit both utility and recreational travel and enhance local permeability. They include:

- The proposed site layout provides off road footpath / cycle paths completing the north south and east west pedestrian linkages in the local area:
- A new 3.5m footpath cycle path is proposed running in a broad north south direction (to the west of Hatherley Brook) between Shurdington Road (near the secondary school proposed Toucan crossing west of Woodlands Road
- Bus stops on Shurdington Road) and Kidnappers Lane opposite the access to the proposed secondary school.
- A new footpath / cyclepath also connects between the eastern development parcel and Kidnappers Lane (to the east of Hatherley Brook); and
- A new 3.5m east west footpath / cyclepath achieved through the site utilising part of Footpath no 6. To the east, it connects with Footpath no. 12 and Merlin Way and to the west the realigned Kidnappers Lane linking into Shurdington Road, Farm Lane and beyond ▪ Footway / cycleway provision at the proposed eastern and western site access arrangements;

This complements the adjacent secondary school application covering the following improvements:

- Upgrade of the existing pelican crossing on A46 Shurdington Road, south west of the Shurdington Road / Kidnappers Lane junction to a Toucan crossing;
- A new Toucan crossing on Shurdington Road between the Kidnappers Lane and Woodlands Road junction;
- Upgraded or new unsegregated footway/cycleway provision on the main approaches to the school site along A46 Shurdington Road, Woodlands Road and Kidnappers Lane;
- Upgrade the surfacing of PROW Leckhampton 13 and PROW Leckhampton 28; and
- A way finding strategy;

Public Transport

We feel that necessary investment should be made in term of upgrading the current bus stop infrastructure along the A46 serving the site to reflect its increased usage and position. This includes additional waiting capacity and shelter alongside Real Time Information Displays to help the integration between bus and rail. We would also suggest that the bus stop enables step free access by incorporating Kassel kerbing into the reconfigured design. The wayfinding strategy developed for the new school could also incorporate creative signage projects to assist the first and last mile to the bus stop provision, particularly the stop in Warden Hill for Service D that stops at the railway station.

Car Sharing & Car Clubs

Whilst car sharing will be promoted amongst new residents of the development, particularly in relation to journeys to work, we would entertain a discussion around the feasibility of a car club vehicle on site with the nominated Travel Plan Coordinator. This could help reduce single vehicle occupancy trips but could also tie in with support for rail related tourism trips that membership to a club could offer at stations elsewhere across the UK.

Behaviour Change

In addition to the hard infrastructure measures set out in the Transport Assessment, the Travel Plan includes a range of non-infrastructure or 'soft' measures for the development to reduce the need to travel and to encourage trips by non-car modes. A Travel Plan Coordinator is being nominated to oversee a very promising package of measures including:

- An information leaflet about the TP, its aims and objectives, how to get involved and how travel will be monitored;
- Information about the community travel websites to provide travel information including the promotion digital applications to support modern travel behaviour such as Stagecoach Buses new travel app;
- A plan of the new development, highlighting local facilities and the nearby key destinations, the walking and cycling routes to these with indicative travel times, locations of local cycle parking, and the location of bus stops;
- Information about opportunities to travel to local schools in the vicinity of the site by sustainable modes, including details of any local school Travel Plans;

- A £150 sustainable travel voucher for the first owner of each dwelling to be used for the following measures:
- A bus travel voucher (such as Stagecoach Taster Tickets) to encourage travel by bus;
- A cycle purchase voucher to assist with the purchase of a bicycles; and
- A voucher towards a rail season ticket to encourage travel by rail.
- Copies of CBC / GCC's cycle plans;
- Bus and rail maps and timetable information;
- Information about journey planning services, e.g., www.nationalrail.co.uk and www.travelinesoutheast.co.uk;
- Information about car sharing;
- Investigation into a car club; and
- Information about home delivery services offered by local supermarkets

We would add that the promotion of PlusBus Ticketing would be advantageous as a direct campaign to support multi modal travel and would also insist on cross promoting the GCRP to enable residents to provide direct feedback on rail and donate skills towards connecting communities with their local station.

Freight & Construction Activity

We would be keen to understand whether the construction company responsible for the development would will be a 'Considerate Contractor' and For suppliers delivering to the site to be FORS accredited. We feel that this is important during the development phase due to the proximity of local schools, key active travel routes and local green spaces where there is a heightened risk to those who associate with a Protected Characteristic Group (PCG). Additional HGV movements would inevitably put additional pressure on the A46 and potentially impact active travel users travelling within the area.

Community Engagement

We would be very interested on helping support Miller Homes and the TPC in the travel planning process to support access to rail and provide the resources and knowledge to feed into local communication streams. We believe that we can complement the range of community facilities being muted; by providing information for the community boards and social media outlets.

We commend efforts to set up a bicycle user group to enable cyclists to share information on routes, safety, cycle maintenance etc and acknowledge how this would enable less experienced cyclists to contact established cyclists and therefore to obtain information, guidance and potentially a 'cycling buddy' to accompany

them on cycle journeys, including to the rail station. We would suggest that this approach also ties in with creating material with alternative routes for different types of cyclist to access the station.

We would like to go a step further and encourage residents, through the dissemination of information, to also take on responsibility for improving their local station through station adoption and to help with efforts to improve last mile links with local communities. This may also form part of the proposed surveying activity where we would be happy to be a critical partner in the formation and delivery of the survey.

Conditions and Section 106

We believe that the commitments made in the planning application are generally sufficient with our commentary providing a few suggestions as to how to build on the offer presented and to strengthen the links with rail and the travel planning process in particular.

GCRP Evidence Base & Supportive Materials

An integral part of the GCRP work will include station travel planning activity and looking at the ways in which sustainable travel can be better connected to each of the stations, including access and equality audits, and a review of signage, waymarking and interpretation. We feel that this can help complement the design solutions to ensure the design of the site effectively amalgamates into the setting.

We would like an open dialogue with the developer to support any travel planning activity and to support the exchange of data and information, ranging from:

- The distribution of resources to aid travel choice in the form of timetables & maps, including new access guide for Cheltenham.
- A community survey to assess travel choice, perceptions and behaviors and capture predicted rail use.
- Light touch Personalised Travel Planning (PTP) activity to aid individual choices (potentially as part of developer contributions)
- Recruit of potential volunteers to joining GCRP and to be local station adopters at Cheltenham.
- Cross promote of local recycling bike offers and training courses and negotiating deals with local suppliers as well as TOCs for taster tickets.

We are also due to launch our Developer Guide which seeks to establish a better relationship between the housing industry, local authorities and the rail industry with the input of local communities and organisations represented by GCRP. We would welcome the opportunity for the applicant to get in touch to engage on this process throughout this proposed development as well as other ventures across the county.

FRIENDS OF BOURNSIDE

C/O 80 Bournside Rod, Cheltenham, GL513AH

Michelle Payne
CBC Planning Office
Municipal Offices
Promenade
Cheltenham
GL50 9SA

Sent via email.

Dear Ms Payne

Planning Application Ref: 20/01788/FUL 350 Houses Shurdington Road, Cheltenham

Several residents in Bournside Road, who's property bounds Hatherley Brook are deeply concerned that this proposed development will further exacerbate the growing menace of flooding in Bournside Road and surrounding area. Consequently, it should be rejected.

Many of our group whose property is in close proximity to Hatherley Brook, have been concerned for some time at the year-on-year increase in water levels. This increased volume of water is not only eroding gardens but causing widespread damage as the incidence of flooding increases.

Many remember the so-called 'exceptional' conditions in 2007, when widespread flooding occurred, and we received assurances from the Environmental Agency that this was a 'once in a hundred-year event'. Since then, we have seen water levels continually rise and the storm on the 17 June 2020 saw the brook rise above levels witnessed in 2007, almost breaching the wall in Hatherley Road. At one point during this flood the Brook was 7.5 meters wide and 2.5 meter deep at the end of the garden at number 80 Bournside Road. and the flood on Boxing Day, 26 December at the same location, measured **8.5 meters wide and 3.2 meters deep**. This flood, the fourth, 'one in a hundred year' event during 2020, wreaked havoc in gardens and brought down huge tree trunks, wooden pallets and numerous other fence posts and deposited other debris that we had to clean up and dispose of. It also threatened existing garden buildings and swept away shrubs and much of the topsoil.

Back in 2007, following the floods, we were further informed by the Environmental Agency that there were two major contributing factors to this unprecedented rise in water levels in the Brook. One being global warming the other upstream development. Since then, the development upstream areas that bound Hatherley Brook has gone on, unchecked and it is no coincidence that this existing and ongoing development around the Kidnappers Lane area has had a dramatic effect on the levels of water in the Brook. Clearly, whatever assurances that were or are being given to the Planning Department about flood risks downstream, are clearly, plain wrong if they discount the risk of further flooding or if they don't, are being ignored. The evidence that the flooding is now a regular occurrence is overwhelming.

In closing, it is an axiom that the Environmental Agency were aware in as early as 2007 that upstream development was a major contributing factor to flooding. We are in no position to establish whether they made this clear to the Planning Authorities, perhaps they did and were ignored or perhaps they failed to do so. Regardless of this, the fact remains that planning permission has been granted and much development has taken place. If further planning permission is granted in the full knowledge that the inevitable result will be increased flooding to many downstream properties, surely the parties involved namely CBC and the Developers will be culpable and must bear the cost of any financial penalties flood victims may incur, when further flooding occurs whether that is damage to property or increased insurance premiums for 'flood-risk' area? One final point. The depth and flow of the water in the Brook in flood, is a serious health & safety risk. A very strong, adult swimmer would struggle to survive a fall into the Brook. A child would stand no chance of survival and planners must be aware of that fact.

Relevant photographs attached.

For FOB



Flood 12 July 2007 Probably 60% less volume of flood as in December 2020 flood (once in a hundred year event!)



Spring 2020 Top: Normal Bottom: During June flood



Large logs brought down Spring 2020 c 3 meters long x 200mm diameter



Log deposited across Brook after water receding 26 December 2020



Floodwater on evening of 23 December 2020 17:53. 9 x 3.5 meters



Hatherley Road flooding

Objection to:**Full planning application (20/01788/FUL) by Miller Homes for the development of land south of Shurdington Road**

Cheltenham Green Party objects to this planning application on the grounds that it contravenes Cheltenham Borough Council's commitment to *carbon neutrality in the borough by 2030*.

Buildings account for 40% of UK carbon emissions ¹, and heat is the largest source of carbon emissions in the UK, directly accounting for over a third ². So there is no possibility of CBC getting close to meeting its commitment to carbon neutrality if it does not immediately require all new build to be zero-carbon – if not 'net carbon positive'.

The challenge of decarbonising our housing stock is immense – retro-fitting to replace gas boilers with low carbon alternatives. It is literally insane to add to this problem by allowing new build construction to take place that does not meet zero-carbon standards.

The planning application states that it will meet or exceed current national building standards. But every relevant government department, energy and sustainability body, architects, etc., recognise that the current building standards are woefully inadequate in the context of the climate crisis.

The solutions needed to make this development zero-carbon are well known: a combination of exceptional insulation and energy efficiency (PassivHaus standard) and energy supplied from renewable technologies, such as Combined Heat and Power/heat exchangers, heat pumps, electrification, solar power, or preparation for hydrogen gas.

Greenhouse gas emissions from road transport make up a further 20% of UK emissions ³. This planning application only plays lip-service to promoting a switch to active travel in Cheltenham. (A leaflet encouraging people to cycle and walk will be handed to new householders... but at the same time the developers want to provide 882 parking spaces for 350 houses... 46% of which are 1 bed and 2 bed!)

Again, CBC cannot meet its target of carbon neutral by 2030, unless it encourages radical changes to transport and how people move around. These radical approaches are now endorsed by national government – see for example the recent Gear Change report ⁴ and the Decarbonising Transport report ⁵ from the Department of Transport.

All new planning applications for major housing developments need to have facilities and links which make it possible for people to live without cars, particularly in a town like Cheltenham. This application makes no such provision.

Cheltenham Green party also endorses the comments on air pollution made by Clean Air Cheltenham, and the many comments on traffic congestion made by local objectors and Leckhampton with Warden Hill Parish Council.

This application must be rejected, and the developers told to make a new application with the future in mind – a development which is:

- net carbon neutral in construction
- net carbon positive in energy when occupied
- which facilitates active travel and discourages car ownership
- does not contribute to local traffic congestion and air pollution.

(see overleaf for references)

¹ <https://www.ukgbc.org/climate-change/>

² <https://www.cbi.org.uk/media/5123/heat-policy-commission-final-report.pdf>

³ <https://www.ons.gov.uk/economy/environmentalaccounts/articles/roadtransportandairemissions/2019-09-16>

⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf

Hi

I'm horrified by the amount of houses planned for Leckhampton.

I have lived in the area for forty five years and my house backs onto the Shurdington Road. Three times this year the apple tree in my garden has been surrounded by a lake of water and on one occasion the water got under the floor boards of the house and knocked out the electrics and warped the doors.

As my neighbours pave over their driveways and more and more houses are built the flooding situation will worsen.

I'm also very concerned about the increased traffic and air pollution - as anyone will tell you trying to cross the Bath Road in the day time will confirm. I used to be able to drive to Gloucester in twelve minutes but it can now take 30 - 40 minutes due to increased traffic. A new senior school opening will mean constant traffic jams in the area at peak times. 350 houses will introduce a further 700 cars, and will completely destroy the village feel Leckhampton has always benefited from.

I strongly feel the council should concentrate on converting empty properties into accommodation for people to live in, and stop the mindless vandalism of building on every available green space.

4 Pickering Close
GL53 0LE





From: > 10 January 2021 15:38
Sent: Internet - Planning Comments
To: Miller Homes Planning Application 20/01788/FUL
Subject:

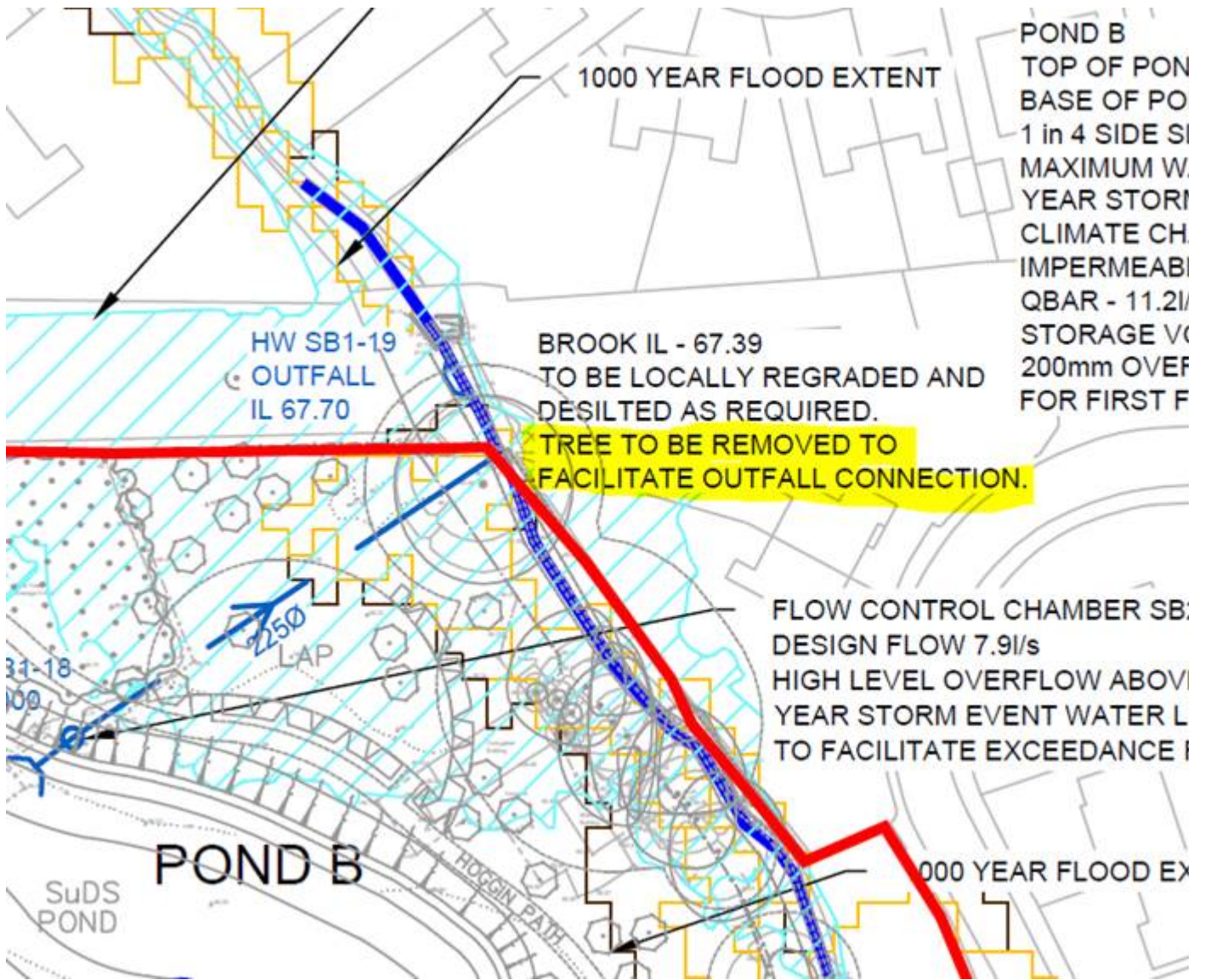
The Sleepers
Merlin Way
Cheltenham
GL53 0LS

To whom it may concern

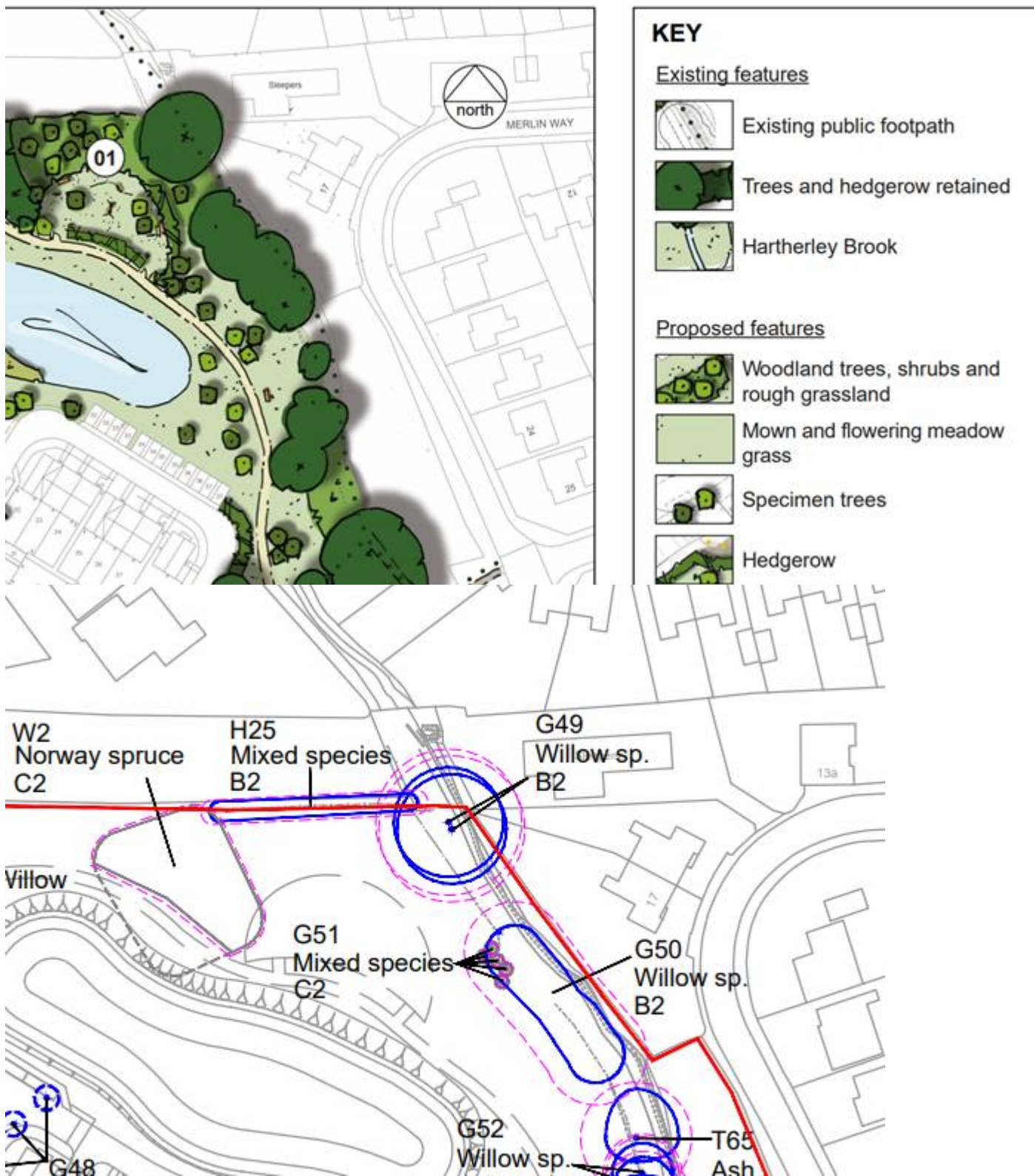
I purchased my house (directly adjacent to the northeast boundary of the proposed development) partly because of the open view, and the feel of living in the green space, while still having the convenience of the town. Both of these characteristics will be severely altered should the proposed 350 dwelling go ahead.

Given the change in my living environment, and the financial impact of this development on the value of my home, I would like to formally object to the application. However, should the development proceed, then I would appreciate consideration be given to mitigate these unwelcome changes as detailed below.

I am particularly concerned that the existing tree line could be effected along the northeast boundary. The Phase 1 Drainage Layout actually states that a tree will be removed to facilitate the proposed drainage outfall from Pond B (see extract below).



Not only do I find this unacceptable as it will significantly increase the visual impact of the proposed development from my property, it also directly conflicts with the developer's own Landscape Strategy (see extract below) and Tree Retention Plan (G49 on the extract below) that explicitly state the tree is to be retained. I would request that explicit assurances are sought from the Developer to ensure the trees along the brook are retained, as noted on their own plans, and that an alternate solution is provided for the drainage outfall that doesn't affect the existing trees.



I am also concerned over the increase in flood risk and I am supportive of the comments made by the Parish Council. In particular, I am concerned that if the maintenance of the attenuation ponds detailed in the Flood Risk Assessment is not carried out, it will have a significantly detrimental effect on local flooding along the brook.

I also agree with comments made by the Parish Council with regards to bio-diversity and ecology. If a development is to be granted on green space, surely the Developer should have to provide a net gain in bio-diversity. The Developer's own Ecology Appraisal demonstrates that this is possible and I would like to see the Developer obliged to implement all of the recommendations detailed in clause 8.5 of the appraisal, as early as possible within the phasing of the development.

Waterwood
Merestones Road
Cheltenham
GL50 2RS

Your Reference 20/01788/FUL Miller Homes 350 Houses

To whom it may concern.

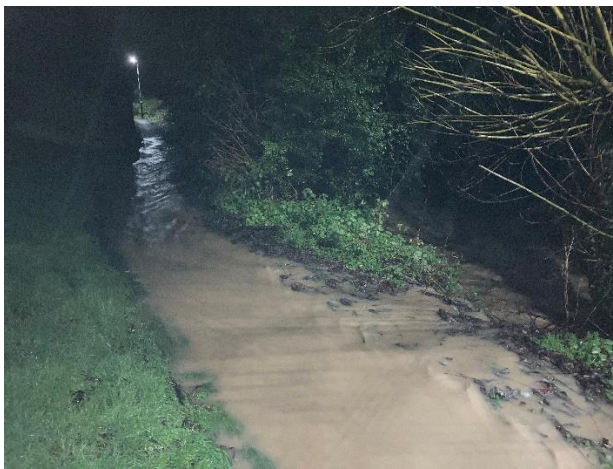
I appreciate the need for new housing in Cheltenham and have no problem generally with the plans submitted by Miller Homes, it won't help the current gridlock on Shurdington Road at rush hour, but there are few routes into Cheltenham unaffected by our general obsession with cars.

I am however concerned about the amount of water that comes off Leckhampton Hill, that will undoubtedly get worse as climate change has more of an impact. The proposed housing site currently absorbs water run off from Leckhampton Hill, we can clearly see this from the amount of surface water currently in the fields and the affect on neighbouring pathways. Buildings and roads do not absorb water and the water continues across the higher elevation to the lower elevation.

The addition of ponds will take some of the excess, to the 100 year flood event +40% according to the plans, but the remainder will need a route to the lower elevations.

Currently Hatherley Brook takes a great deal of this run off and struggles now. The route under the A46 into Merestones and down into Bournside Road is very poorly maintained with paths regularly flooding and even collapsing.





Our house lies several hundred yards downstream of the meeting point of the 2 Hatherley Brook routes through Merestones. I have had to improve the flood defences myself in my own time and at my own cost, but I can't do anything about the diameter of pipes or clearance below bridges.

The below pictures show the difference between the water levels in a 5 hour period on Wednesday 23rd December. This is the second time this year that the water has gone over the capacity of the pipe. The first being 17th June, following dry weather, so saturated higher ground was not a factor. On both occasions this was one day of rain. How much more water would be required to flood both mine and my neighbours properties? Do we need to expect 2007 levels regularly, more than one day of heavy rain?



Where will this excess water go? There is a solution, drastically improve the culverts, dredge, line, widen, deepen. I suspect the council have no resources to do this judging by the current poor state of repair and the developers will bamboozle the council with survey statistics proving that this is a one in a hundred year event in order to prevent loss of margin. I don't believe the developers (Boo Homes) re-assurances did the residents of Leckhampton Views any good in 2016, probably more like a one in hundred day event for them.

The drainage plan says for the blue line that represents the existing watercourse "to be retained and maintained as appropriate". They are not be maintained now so who will be responsible for this in the future?

Your consideration of the above would be appreciated.

Yours sincerely

Objection to **Shurdington Road-350 houses** (CBC application 20/01788/FUL)

In the three months since the planning committee's first consideration of this application last December, virtually none of the promised additional evidence has appeared, and this month's planning agenda item is now accompanied by exactly the same thinly-reasoned text from the planning officer, recommending permit.

As regards the primary issue of "severe" traffic impact, the key paragraphs 'worth' reading from the officer's 80 pages are just paras. 6.4.8 to 6.4.14, and 7.1 to 7.13, (which for convenience are appended hereto).

Assuming you remain unconvinced that so many as 350 units are sustainable on transport grounds, onto this critical section of A46, then continue to seek more independent data.

350 is at least 50 too many. Therefore, immediately seek the deletion of the 49 houses in the environmentally sensitive amber-coloured fields R2 and R3, up along the Hatherley Brook.

If the applicant does go to appeal for non-determination, most inspectors (like Inspector Clark, who examined here in 2016) are not timid rubber-stampers.

The brief unquantified reasoning supplied by GCC Highways (and repeated by the planning officer) is easily discounted as being lightweight and implausible.

For example, para. 6.4.9 simply accepts the applicant's claim that traffic would be "*dispersed around the network*", which can hardly occur when there are no parallel alternatives to the A46 radial, and when the major exits for these 350 dwellings would feed onto a substantially jammed section of A46, which the previous paragraph 6.4.8 admits is "*recognised as a congested corridor*".

Below are detailed criticisms of the recent Highways document.

I also append my December objection to this proposed crippling of a key radial and gyratory route for Cheltenham.

March 2022:

On 16th March, six working days before the planning meeting on 24th, a report was published calling itself "Community Infrastructure", which is truthfully another (pathetic) attempt at a Highways report, (done by GCC's 'Highways Development Management' (HDM) Team Leader), incorrectly claiming (yet again) that "*traffic generation from the allocation was considered at the time of the adoption of the plan*".

This is rounded off with GCC's standard boilerplate: "*The Highway Authority has undertaken a robust assessment of the planning application*", (the paragraph sloppily repeated twice, in this frequently ungrammatical report).

Yet there are no details of any "robust" traffic questioning, or evaluation of objectors' detailed challenges.

Clearly the impact of 350 dwellings, on top of GCC's recent insertion of a 900-pupil Secondary school, should require detailed evaluation of how this scheme could conceivably escape the Secretary of State's established finding of "severe" A46 congestion from 650 dwellings, (which

were to have their access partly via the south end of Kidnappers Lane, i.e. to/from Church Road rather than the A46).

In addition, the overall traffic assessment for this application needs, now, to take integrated account of the Redrow 377 houses in Farm Lane, not evident to the Bovis-Miller 650-houses Appeal dismissal (which in effect dismissed GCC Highways' incompetent "robust assessment" of 'no objection').

Where are GCC's calculations that the A46 queue lengths will not severely jam Cheltenham's principal southern radial ?

Or does this "HDM" department lack the ability to make such calculations, and therefore covers it with "robust assessment" verbiage ?

December 2021:

Why CBC can and should refuse so many as 350 units on the A46 (Shurdington Road)

The painstaking JCS Examination ruled that the sensitive landscape of Leckhampton should NOT become a Strategic-scale urban extension (defined as greater than **450** houses). Yet permissions have been given for 377 at Farm Lane (Redrow), 25 at Kidnappers Lane (Hitchins) and 12 on Shurdington Road (Kendrick), which totals **414**, PLUS a 900-pupil Secondary school, (self-permitted by GCC).

Apart from this now 'Strategic' scale of development, the overall Traffic impact is not far short of Bovis-Miller's application for 650 houses, to which GCC Highways found no objection, but which the appeal inspector and the Secretary of State ruled to have "**severe**" traffic impact.

For this application, GCC is not an unbiased consultee on Transport, because having pushed its large Secondary school very late into the JCS-envisaged mix, it now prefers not to impact Miller.

It is of interest that TBC Planning has very recently discounted a 'no objection' from Highways England to Hitchins' application for 460 houses off the A46 at Fiddington (21/000451/OUT & 21/01348/OUT), and is minded to Refuse, (stating "*The application has not demonstrated that there would be an acceptable impact on the strategic road network in conflict with Policy INF1*" [of the JCS]).

The narrow unwidenable A46 (Shurdington Road) is the sole southern A-road into Cheltenham town centre, for whose uncongested viability this radial route is vital.

With a still unimplemented (because probably unachievable) scheme for the Moorend Park Road junction, GCC settling for "*mitigation through offsite improvements, enhanced walking and cycling connections*" is no compensation or solution for a crippled A46 which most residents now predict.

Adding 350 onto Shurdington Road is now simply too many. They are packed in with minimal garden-space (compared to the adjacent estates). There are a total of **891 parking spaces** planned (455 North; 436 South), showing that is clearly a drive-to location (too far to walk to shops, etc).

One initial improvement would be to remove the **49** houses sited in **fields R2 and R3**, which the JCS Inspector indicated should not be developed. The important green corridor along the Hatherley Brook could then be less constricted, benefitting wildlife and amenity.

I have defended Leckhampton's landscape (through regional and local plan and appeal inquiries) since the 1992 Local Plan Examination. This current proposal is excessive, over-dense and (on top of the imminent school) a traffic disaster.

How are residents of the areas between Leckhampton and Charlton Kings to drive to Gloucester or to the Tewkesbury Road retail centre, other than via this critical section of the A46, i.e. from the Moorend Park Road junction to reach the 'ring road' of Up Hatherley Way ? It must be kept free-flowing and viable at all times.

Where is GCC's documentation of its claimed 'robust and full' traffic assessment ? Instead of any detailed calculations or discussion, GCC (on November 26th) merely summarises what the applicant has asserted, ignoring any evaluation of the submitted counter-evidence.

At the very least, **defer** this decision for more auditable analysis from GCC Highways, and adequate time to consider it. We need not fear proper independent assessment by another Inspector.

Highlighting some comments from others:

GCC-Highways:

"provides the anticipated number of dwellings in the Cheltenham Plan, and consequently the traffic generation from the allocation was considered at the time of the adoption of the plan."

This is not true; the Local Plan Inspector left a full traffic assessment open for the planning application to demonstrate.

Civic Society:

"This is a very high density development: the result of trying to fit 350 units onto the site. This has resulted in some very small units, more appropriate to a city centre development than this semi-rural location. If you compare the size of plots and properties surrounding this site, the proposed density is immediately visible."

CBC Tree Officer:

"there appears to be little scope for new tree planting to mitigate for anticipated losses. The reduction in the number of dwellings would facilitate a less compact application and more potential for greater planting"

Leckhampton with Warden Hill Parish Council:

"The validity of the MD4 allocation, of which the Miller development is part, also depends on meeting the condition set by Inspector Burden that the proposed traffic mitigation at the A46/Moorend Park Road junction must be shown to work."

Extracts from the March 2022 Officer's Report:

transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

6.4.3 As previously noted, the application proposes two vehicle access points from Shurdington Road; a priority junction and a new roundabout. The roundabout proposal also realigns Kidnappers Lane, with the existing junction with Shurdington Road proposed to be closed and replaced with a cycleway.

6.4.4 A new Toucan Crossing point is proposed to the east of the site on the Shurdington Road which would form part of a series of wider infrastructure improvements.

6.4.5 From a highways perspective, the access, parking and highway safety impacts associated with the proposed development have been fully assessed by the Highways Development Management Team (HDM) at the County Council, as the Highway Authority acting in its role as Statutory Consultee, and their full comments can be read in Section 4 above.A.

6.4.6 In their initial response, HDM requested a deferral to allow for continued discussions to take place with the applicant to ensure that the Transport Assessment and scheme designs reflect current national and local policy, and that the proposals were complementary to the consented secondary school highway works.

6.4.7 Subsequently, HDM have now responded to advise that no highway objection is raised subject to conditions and financial obligations.

6.4.8 With regard to the highways impact of the development, particularly on the Shurdington Road, which has been raised as a concern by many of the objectors, HDM set out that the applicant has prepared a Transport Assessment which considers the impact of the proposal from a multimodal perspective, to include modelling on the potential impact on the Shurdington Road which is recognised as a congested corridor. It also considers routes to key destinations and how access to those services could be improved.

6.4.9 In terms of trip generation, the proposed development is expected to generate 127 departures and 51 arrival vehicle trips in the AM peak (08:00-09:00) and 79 departures and 126 arrives in the PM peak (17:00-18:00); and these would be split between the two access points. The transport modelling shows the trips would be dispersed around the network and this has potential implications at the junctions of Moorend Park Road and Leckhampton Lane.

6.4.10 With regard to the Moorend Park Road junction, HDM advise that there is already a consented scheme in place to improve this junction associated with the Farm Lane development.

6.4.11 They further advise that the Leckhampton Lane junction is proposed to be amended to provide a degree of space for right-turning traffic but there is a balance to be had in providing more capacity whilst maintaining pedestrian space. In considering the needs of pedestrians as a key priority, a reduction in the footway width is not acceptable. Furthermore, increasing capacity could result in an increase of rat running whereas the A46 is the more suitable route. The proposal therefore looks to provide an improvement within the current kerblines, and this is considered to be acceptable.

6.4.12 In addition, HDM acknowledge that the proposal has the significant potential to reduce walking distances from the existing residential communities to the new Leckhampton High School; with new and improved connections made from Merlin Way, Shurdington Road and Kidnappers Lane. Within the site, the proposal would create a low-speed environment which includes measures to prioritise walking and cycling movements; the proposed pedestrian and cycle routes providing more attractive routes than would otherwise exist.

The proposal also provides missing footway infrastructure on the A46 which is considered to be a benefit of the scheme and contributes to its sustainability credentials.

6.4.13 HDM therefore conclude that:

Overall, the proposal is considered to be acceptable and proposes suitable mitigation through offsite improvements, enhanced walking and cycling connections and planning obligations.

The Highway Authority has undertaken a robust assessment of the planning application. Based on the analysis of the information submitted the Highway Authority concludes that there would not be an unacceptable impact on Highway Safety or a severe impact on congestion. There are no justifiable grounds on which an objection could be maintained.

6.4.14 Officers are therefore satisfied that the proposed development is acceptable in highway terms, and is compliant with JCS policy INF1 and the relevant paragraphs of the NPPF.

6.5 Drainage and Flooding

6.5.1 Adopted JCS plan policy INF2 advises that development proposals must avoid areas at risk of flooding, and must not increase the level of risk to the safety of occupiers of a site, the local community or the wider environment either on the site or elsewhere. Additionally, where possible, the policy requires new development to contribute to a reduction in existing flood risk; and to incorporate Sustainable Drainage Systems (SuDS) where appropriate.

6.7.2 The application has been accompanied by a Flood Risk Assessment (FRA) which has been reviewed by the Lead Local Flood Authority (LLFA) at the County Council, as a statutory consultee for surface water flood risk and management. Again, the comments can be read in full at Section 4 above.

6.7.3 The FRA sets out that detailed hydraulic modelling has been carried out to assess the existing flood risk to the site, to include blockage analysis of culverts crossing the A46, Shurdington Road. The outcome of this model has been reviewed by the Environment Agency (EA), with the published Flood Zones subsequently updated to reflect this.

6.7.4 Much of the site is located within Flood Zone 1. Where parts of the site fall within areas of Flood Zone 2, the layout has been designed so that the housing and sustainable drainage features are located outside of zone 2 and areas at risk of surface water flooding.

6.7.5 It is proposed that surface water would be discharged into the Hatherley Brook and its tributary; with surface water stored in three SuDS ponds serving three hydraulic catchments on the site. The LLFA have confirmed that *"They have been designed to store water in events up to the 1 in 100 year rainfall event plus 40% for climate change and simulations of the network on MicroDrainage show that they are a suitable size"*.

6.7.6 In their initial response however, the LLFA also highlighted that:

The MicroDrainage simulations show that the development will not flood in a 1 in 30 year rainfall event and that the flooding of the network in a 1 in 100 year rainfall event will be confined to the highways. Although this meets the Non-statutory technical standards for sustainable drainage, the flooding from manhole SB11 (Catchment B1) appears to be directed off the site onto the Shurdington Road. While this is an acceptable strategy for exceedance flows, in events up to 1 in 100 year rainfall event, surface water should not be leaving the site in this manner.

Other S106 obligations

6.9.12 Other obligations to be secured via the S106 agreement relate to the management and maintenance of the public open space, LAPS, allotments, and community orchard.

6.10 Other considerations

Public Sector Equalities Duty (PSED)

6.10.1 As set out in the Equalities Act 2010, all public bodies, in discharging their functions must have “due regard” to this duty. There are three main aims:

- Removing or minimising disadvantages suffered by people due to their protected characteristics;
- Taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people; and
- Encouraging people with certain protected characteristics to participate in public life or in other activities where participation is disproportionately low.

6.10.2 Whilst there is no absolute requirement to fully remove any disadvantage, the duty is to have “regard to” and remove OR minimise disadvantage and in considering the merits of this planning application the planning authority has taken into consideration the requirements of the PSED.

6.10.3 In the context of the above PSED duties, this proposal is considered to be acceptable.

7. CONCLUSION AND RECOMMENDATION

7.1 Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise.

7.2 Furthermore, paragraph 11 of the National Planning Policy Framework 2021 sets out a presumption in favour of sustainable development which in decision making means:

- c) *approving development proposals that accord with an up-to-date development plan without delay; or*
- d) *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i) *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii) *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

7.3 The site to which this application relates forms part of the Leckhampton mixed-use allocation in the Cheltenham Plan 2020 (policy MD4); as such, the general principle of developing the site for approximately 350 houses has already been established and remains acceptable.

7.4 The application has been submitted following extensive pre-application discussions, and has been subject to additional design refinements during the course of the application. Officers are therefore satisfied that the overall design and layout of the scheme is acceptable and would result in a high quality development that will create an identity of its own, whilst responding to nearby developments, and will be a good place to live.

- 7.5 The application proposes a policy compliant (40%) level of affordable housing; and would make a valuable contribution to the borough's housing stock.
- 7.6 The sustainability credentials of the proposed development have been improved during the course of the application to include solar PV panels and EV charging points, which will go some way to meeting Cheltenham's 'Climate Emergency' commitments, whilst ensuring that this remains a viable and deliverable scheme. Overall, as amended, the scheme would achieve a site wide 20% reduction in CO2 emissions over that required by the 2013 Part L Building Regulations standards.
- 7.7 The proposed development has been fully assessed by the Highways Development Management Team (HDM) at the County Council, as the Highway Authority acting in its role as Statutory Consultee. The applicant has worked closely with HDM to ensure that the Transport Assessment and proposal reflect current national and local policy, and that the proposals are complementary to the consented secondary school highway works. HDM now raise no highway objection subject to a number of conditions and financial obligations, concluding that *"Overall, the proposal is considered to be acceptable and proposes suitable mitigation through offsite improvements, enhanced walking and cycling connections and planning obligations."*
- 7.8 The application has been accompanied by a Drainage Strategy and Flood Risk Assessment (FRA) which have been reviewed by the Lead Local Flood Authority (LLFA) as a statutory consultee. Following the submission of revised information, the LLFA raise no objection to the proposals subject to conditions. The LLFA are satisfied that the "applicant has demonstrated that the strategy meets national standards for sustainable drainage and should not be putting the development itself or elsewhere at increased risk of flooding."
- 7.9 The FRA has also been assessed by the Environment Agency (EA) who conclude that "as all extents for all forms of flooding will be contained within the green open space corridors either side of the watercourses, we have no objections to the proposals from a flood risk perspective." In addition, Severn Trent raise no objection subject to a condition.
- 7.10 The application has been reviewed by Natural England and Wild Service (the Council's specialist Ecology Advisor) and the ecological impacts of the proposed development have been found to be acceptable subject a number of conditions, to include the submission of a 10-year Landscape and Ecology Management Plan (LEMP) prior to the commencement of development. The LEMP would be required to expand on the habitat enhancement and creation recommendations outlined in the Ecology reports, and include detailed management prescriptions for retained and created habitats (including for Hatherley Brook, the stream, the orchards, hedgerows and wooded areas, grassland).
- 7.11 With regard to the landscape and visual impacts of the development, officers are satisfied that, overall, the impacts are acceptable. Ryder Landscape Consultants (acting as the Council's specialist Landscape Advisor) have reviewed the application and, whilst there are some residual concerns, officers are satisfied that specific matters of detail can be resolved through the discharge of conditions.
- 7.12 With all of the above in mind, taking into account the economic, social, and environmental aspects of the application, officers are satisfied that the proposed development would be in accordance with relevant national and local planning policy.
- 7.13 The officer recommendation is to grant planning permission subject to a signed S106 legal agreement, and the following schedule of conditions:

Objection to Shurdington Road (A46) 350 houses application – CBC 20/01788/FUL

Please read the attached 'agreement' document (between GCC Highways and Miller Homes) which shows how the A46 Shurdington Road traffic problems are now being evaded.

This is evidence document ED025 from the recent Cheltenham Local Plan inquiry, (concerning Examination Matters 3 and 8):

https://www.cheltenham.gov.uk/downloads/file/7249/ed025_itb12049-014tn_asotm_with_gcc_leckhampton

It is an 'agreement' (unfulfilled) between Miller and GCC, in response to the LP Inspector's comments.

You need only read paragraphs 1.1.8 and 1.1.13 to see that none of these agreed congestion remedies are now being proposed in Miller's application.

Apart from the unchanged Moorend Park Road junction, GCC Highways (in its recent 'no objection' document) has even done an about-turn on the agreed 'right-turn lane' in Shurdington, giving two dubious reasons. (If it wants to, traffic will simply wait to right-turn, and block the flow behind it.)

Gloucestershire County Council, having damaged Miller's prospect by inserting (very late in the Plans process) a 900-pupil Secondary school (on intended Local Green Space fields, where it had been JCS-refused a housing scheme, via Edward Ware Homes), and having given itself permission for that school as sole adjudicator, GCC may now be wary of giving Miller other than a green light on traffic.

Whoever has made a call-in request, I would support that, if only to respect the 2016 Inspector Clark and Secretary of State's carefully considered verdict of "severe" congestion impact, and thereby produce some genuinely impartial assessment of this application's cumulative traffic consequences (at 350 scale).

ED025

'Agreed Statement between Miller Homes and Gloucestershire Count Council'
Cheltenham Local Plan submitted evidence document, 25th February 2019 :

Agreed Statement between Miller Homes and Gloucestershire County Council

Project No: ITB12049
Project Title: Leckhampton, Cheltenham
Title: Cheltenham Local Plan Examination Matters 3 and 8
Ref: ITB12049-014 TN
Date: 25 February 2019

1.1.1 This is an agreed statement between i-Transport (on behalf of Miller Homes) and the local highway authority, Gloucestershire County Council (GCC), in relation to Matters 3 and 8. This statement is submitted following the Inspector's comments at the Matter 3 session to clarify the level of agreement on transport matters between Miller Homes and GCC.

Signed: [REDACTED] Mark Gimingham, Partner, i-Transport on behalf of Miller Homes

Signed: [REDACTED] Jamie Mattock, Team Leader, GCC

Pre Application Discussions

1.1.2 i-Transport and GCC have held, and are continuing to hold, extensive pre application discussions regarding Miller Homes' development proposals at Leckhampton.

Opportunities to Promote Sustainable Transport Modes

1.1.3 The location of the Policy MD5: Leckhampton site is within a reasonable walking and cycle distance of a variety of everyday local facilities and destinations. There are routes between the site and these local facilities and destinations that are either satisfactory in their existing form or capable of improvement (secured by condition or S106 obligation) meaning that there is the opportunity for many future residents to walk and cycle.

1.1.4 The site lies adjacent to the A46 Shurdington Road and is highly accessible by bus. Stagecoach's high frequency Service 10 bus service (Cheltenham – Shurdington – Brockworth – Gloucester – Lower Tuffley) routes along Shurdington Road and directly past the site.

1.1.5 In transport terms, the site is sustainable with good opportunities to promote sustainable transport modes.

Site Access Arrangements

1.1.6 GCC has previously agreed to site access arrangements from the A46 Shurdington Road as part of the previous Miller / Bovis application / appeal.

1.1.7 i-Transport and GCC has discussed and agreed the site access strategy for a proposed residential development of 350 dwellings. Two points of vehicular access to the Miller site are proposed from the A46 Shurdington Road. It is envisaged that the western Shurdington Road access will include the realignment to the east of the A46/ Kidnappers Lane junction (closure of the existing Kidnappers Lane junction) within the MD5 allocation area and will take the form of a signal-controlled junction. The proposed eastern Shurdington Road access will take the form of a priority junction (priority along the A46) and a nearby pedestrian crossing.

Traffic Impact

1.1.8 The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) Transport Evidence Base / Strategy identifies eleven strategic travel corridors to assess the strategic impacts of the land use scenarios outlined within the JCS. Corridor 9 – A46 Bath Road (central Cheltenham) to A417 junction is the most relevant to the MD5 Leckhampton site. GCC's preferred mitigation package for Corridor 9 includes:

- Leckhampton Lane - upgrade A46 / Leckhampton Lane priority junction, to include a dedicated right turn from A46 south into Leckhampton Lane (funded through developer contributions);
- Moorend Park Road - A46 Shurdington Road northbound approach to Moorend Park Road – additional highway space for right turning traffic by providing a longer stacking lane (funded through developer contributions); and
- Badgeworth Lane - A46 / Badgeworth Lane priority Junction – Signalisation of junction to provide improved access to/from Badgeworth (funded through ad hoc funding opportunities).

1.1.9 The JCS Transport Evidence Base / Strategy (paragraphs 6.10.8 and 6.10.9) confirm that:

“The outcome of these changes resolves delays along the Shurdington Road corridor. There remain minor issues during both peaks for the A417 / A46 junction at both A46 approaches. Possible signalisation of these approaches may mitigate the scale of delay predicted by the model.”

“The improvements will significantly benefit public transport specifically the operation of the 10 service within the A46 corridor by reducing the risk of journey time uncertainty.”

- 1.1.10 GCC and i-Transport have agreed that a detailed microsimulation traffic model (Paramics) of the A46 Shurdington Road corridor in south west Cheltenham, including Leckhampton and the A417 junction) provides for an appropriate method for assessing development traffic impacts.
- 1.1.11 i-Transport undertook a comprehensive suite of traffic surveys in November 2016. i-Transport has developed a base microsimulation traffic model (Paramics) of the A46 Shurdington Road corridor in south west Cheltenham. GCC has reviewed the base microsimulation traffic model and agrees it provides an accurate representation of the base traffic and network conditions and is suitable for future year and development impact / mitigation testing.
- 1.1.12 GCC and i-Transport have agreed trip rates and traffic generation for residential development at the MD5 Leckhampton site.
- 1.1.13 i-Transport has worked up, in consultation with GCC, the following improvement schemes on the A46 corridor.

A46 Shurdington Road/ Moorend Park Road Junction

- There is already a committed improvement scheme at the A46 Shurdington Road / Moorend Park Road junction associated with the Land West of Farm Lane development. Additional improvements have been identified which include extension of the ahead and left turn lanes on the A46 northbound approach to create a longer narrower two-lane approach before flaring to form three lanes and moving the A46 northbound and moving pedestrian stage to stage two to avoid phase isolation on termination of the arm.

A46 Shurdington Lane/ Leckhampton Lane Junction

- i-Transport has undertaken design work, in consultation with GCC, for an upgrade to the existing A46 Shurdington Road/ Leckhampton Lane priority junction to provide a ghost island right turn arrangement This will enable vehicles turning right into Leckhampton Lane to wait safely without impeding northbound movements on the A46 Shurdington Road.

1.1.14 GCC is content that these improvement schemes:

- Accord with the preferred mitigation package for the A46 corridor as part of the JCS Transport strategy (see paragraph 1.1.8 above); and
- Are deliverable.

1.1.15 GCC is aware that i-Transport has developed an opening year model and tested a development proposal of 350 dwellings and a secondary school along with the improvement schemes listed in

paragraph 1.1.13. The modelling results indicate that as a result of the mitigation measures, there will be an improvement to network conditions on the A46 corridor with a reduction in journey times and queuing compared to the opening year base scenario. The residual cumulative impacts on the road network would therefore not be severe.

- 1.1.16 GCC will undertake a detailed review of all future year and development impact and mitigation testing when they are provided within the transport assessment to be submitted with the planning application. GCC considers that the modelling results presented are as they would expect for the A46 corridor and accord with the conclusions of the JCS Transport Strategy which confirms that GCC's preferred mitigation package "**resolves delays along the Shurdington Road corridor**" and "**significantly benefit public transport specifically the operation of the 10 service within the A46 corridor**". The modelling is developed from the base microsimulation traffic model that has been reviewed and agreed by GCC.

Further Objection to deferred application 20/01788/FUL : Shurdington Road (A46) 350 houses

7-April-2022

It would be vexatious to take March's officer recommendation to Permit this application back to the April planning meeting without any significant new evidence, merely some cosmetic 'rewording' (which is all that GCC Highways provided last month compared to its first attempt three months earlier at the December 2021 meeting).

Any revised documents ought to have been published by 31st March 2022, i.e. 21 days before the meeting on 21st, to allow objectors time to rebut (before the officers' assessment Report is published on 14th).

For the traffic issue, far more is needed than merely some suggested "wording for a highways Condition", not amounting to a drawn (and costed) revised plan.

I understand that the unimplemented and long overdue changes to the Moorend Park Road junction (required for the Redrow 377 houses development, now nearing completion) must now be revised to take account of cyclist-priority legislation.

Therefore Miller and Bovis now ought to prepare and publish an agreed revised layout for this junction, before any credible highways assessment can be approved, for this most critical A46-MPR (Moorend Park Road) junction into Cheltenham, near to which a total of 761 households (=377+350+12+22) plus a 900-pupil Secondary school is to be added, far in excess of the 650 houses ruled by the Secretary of State to amount to "severe" traffic congestion of the A46.

The revised junction layout needs to show increased roadway width and lane length, workably set out, (and CPO-costed). A mere 'Condition' to develop such down the line will probably be as illusory and unimplementable as Redrow's 'Condition 16' (from six years ago).

All that Miller's consultants (i-Transport, of Basingstoke) have said in their most recent Addendum dated 31-8-2021 (paragraph 5.1.1) is that:

"GCC have confirmed that Redrow have been instructed to work towards technical approval/implementation of the preferred i-Transport scheme - see i-Transport drawing ITB12049-GA-23 at Appendix S of the original Transport Assessment."

"Work towards" provides no more certainty than did the junction changes which Redrow promised but has failed to deliver, a Condition which has not been implemented by GCC or enforced by TBC.

The above statement amounts to 'pass the A46 traffic parcel' to Redrow, with the connivance of a do-nothing GCC Highways.

CBC planners with supposedly local knowledge ought not to be joining in this conspiracy to overlook the transport 'elephant'.

Planners elsewhere (here they have the cogent support of informed local objectors) can and do query a formulaic 'no objection' from a Highways Agency, especially one where GCC also has an interest in overlooking the impact of its 900-pupil Secondary school which it has self-permitted since the Redrow 377-houses permission.

GCC Highways (GCCH) was responsible for the (failed) implementation of the Redrow MPR junction upgrade, which GCCH had itself designed.

It is a fundamental problem that GCCH design and then rubber-stamp their own 'solution', uncosted, and then are able to fail to deliver it.

The above-cited Transport Assessment and Appendix S dated 15-10-2020 comprises just two diagrams (appended below):
the Redrow-PFA junction upgrade dated 2018; and
the Miller-iTransport scheme (also dated 2018), which is almost identical.

Thus for 350 extra households onto a difficult narrow main road there are negligible changes between the two plans, in terms of lane lengths.

(A wider exit-lane in Moorend Park road westbound will not be significant.)

Where is GCCH's reasoning published?, since they are clearly directing these schemes.

This section of A46 from Moorend Road to Up Hatherley Way is a major Radial and Gyrotory artery for Cheltenham. It will clearly be subject to miles-long queues towards the MPR junction, which will block exits from Miller (North section) and from Kidnappers Lane cum Miller (South section) and from Woodlands Road (i.e. the Warden Hill district). Horrendous.

Leckhampton (indeed SouthWest Cheltenham) continues to suffer a major traffic let-down, knowingly let drop between the three stools of GCC, TBC and CBC. Not one of the three (nor either Redrow or Miller) 'owns' the provision of an integrated A46 traffic solution.

Ultimately it now ought to be Cheltenham BC insisting on a credible remedy for these three major developments' combined traffic impact.

Unfortunately we know from CBC's recent (failed) attempt to delete this very roads-deficient town's sole ring road (the Inner Ring, at Boots Corner) that CBC lacks basic traffic competence. It is much easier (but reprehensible, lacking local commonsense) for planning officers to say 'we cannot query GCC Highways'.

Yet GCC's advice was proved wholly defective by the Miller-Bovis 650-houses Inquiry verdict; and GCC's HDM team is primarily concerned with visibility splays rather than strategic traffic corridors; there is no evidence of the HDM team being able to perform or audit such calculations of traffic transparently.

So what now is the final MPR junction layout and costing, before permitting so many as 350 units ?

(This is an issue of viable design, even more than one of implementation.)

History (of nothing that ever materialised for the A46 congestion)

(1)

Redrow-377: 14/00838/FUL

<https://publicaccess.tewkesbury.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=NAPKJOQDG6S00>

18-8-2016 : 'Condition 16 - proposed traffic signals - moorend park road @a3',
drawn by PFA Consulting, of Swindon:

https://publicaccess.tewkesbury.gov.uk/online-applications/files/6CEFB56A7837B20085AE3DB303E571BC/pdf/14_00838_FUL-CONDITION_16_-_PROPOSED_TRAFFIC_SIGNALS_-_MOOREND_PARK_ROAD_A3-569751.pdf

26-4-2016 : 'Decision Notice' : Condition 16

"Prior to the first occupation of any dwelling details of a highway improvement scheme at the Moorend Park Road signal controlled junction shall be submitted to and approved in writing by the Local Planning Authority. No more than 200 units to be occupied prior to the implementation of these works"

4-9-2014 : 'Transport Assessment'

Para. 9.6 :

"A financial contribution will be made to an improvement at the A46 Road / Moored Park Road junction to increase its operational capacity; the timing and level of financial contribution to be agreed with GCC."

Appendix R : 'Gloucestershire County Council's Potential Improvement to the A46/Moored Park Road junction'

Plan shows 3 lanes NE-bound; central island removed.

Thus, it was for GCC to implement their junction design; and for TBC to enforce delivery, (with CBC sitting back).

(2)

Secondary School: 19/0058/CHR3MJ

<https://planning.gloucestershire.gov.uk/publicaccess/applicationDetails.do?activeTab=externalDocuments&keyVal=PV9H0HN01600>

25-11-2019 'Off Site Works Key Plan'

https://ww3.gloucestershire.gov.uk/PROW/PROWWS.aspx/GetFileGCCContents?Filename=images%2f19_0058_CHR3MJ_SK02_REV_H.PDF

23-8-2019 'Appendix K: Transport Assessment', by Cotswold Transport Planning, Cheltenham.

https://ww3.gloucestershire.gov.uk/PROW/PROWWS.aspx/GetFileGCCContents?Filename=images%2f19_0058_CHR3MJ_TRANSP_ASSESS.PDF

Para. 7.80:

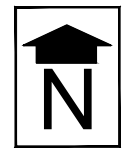
"The network mitigation required to be delivered to accommodate both the 900-place Secondary School and emerging allocation of 300 residential dwellings and which has been modelled in this Paramics run is outlined below.

- (i) Moorend Park Road/A46 Shurdington Road - The removal of the central island and the provision of an additional traffic lane on the A46 Shurdington Road west approach to the junction, providing a dedicated right turn. On top of this, the full development scenario includes a further improvement by extending the two-lane section of the southwestern arm of the junction;
- (ii) Kidnappers Lane/A46 Shurdington Road - relocation and signalisation of the Kidnappers Lane/Shurdington Road junction;
- (iii) New priority junction on the eastern side of the A46 Shurdington Road as a second access to serve the emerging allocation site; and
- (iv) A46 Shurdington Road/Leckhampton Lane priority - Dedicated right turn holding lane."
[which GCC has now dropped]

CTP (GCC and Kier Construction's traffic consultants) for the 900-pupil Secondary School just assumed that the Redrow upgrade to the A46-MPR junction would be in place for their 2026 traffic modelling scenario.

Thus, GCC's School application (self-permitted by GCC) pre-determined the cumulative traffic impact of the 350-houses "allocation", even though the subsequent Local Plan (Final Report, March 2020, paragraph 73) reiterates the JCS Policy requirement for "traffic impacts to be fully assessed at planning application stage", presumably by Miller-iTransport work (followed by pre-committed GCC's "auditing").

KMP



Stratton Park House, Wanborough Road
Swindon, SN3 4HG

Telephone
01793 828000

Website
www.pfapl.com

For Technical Approval

These drawings are produced for the purposes of obtaining the approval of an adopting or maintaining authority, and reliance on this drawing, for whatever purpose, is at the developer's/contractor's risk until formal technical approval has been received.

NOTES

1. Drawing based on Topographical Survey information 10033-1 and 10033-2 provided by Anthony Brooks Surveys Ltd dated September 2017/May 2018 and Ordnance Survey Mapping, Crown copyright. All rights reserved. PFA Consulting Licence no. 100000054.

2. All highway works to be constructed in accordance with the current version of the Specification for Highway Works (SHW), published by The Stationery Office as Volume 1 of the Manual of Contract Documents, as amended and Gloucestershire County Council's Standards in Manual for Gloucestershire Streets 4th Edition dated April 2016.

3. The works shown on this drawing could affect Statutory Undertaker's apparatus and the Contractor is required to verify the location and depth of all such apparatus prior to commencement of the works and to take any precautions necessary when working in the vicinity of any such apparatus.


4. All works within the limit of the highway shall be signed in accordance with the Department of Transport's Traffic Signs Manual (2009) Chapter 8 "Traffic Safety Measures and Signs for Road Works and Temporary Situations".

KEY

 New Carriageway Construction

TRAFFIC SIGNALS KEY

 Existing Signal Head

 Existing Push button

 Existing Controller TS208

Refer to drawing no. R322/42 for Signal Modification Details.

Rev	Date	Description	Drawn	Check
#	09/08/18	First Issue.	JW	MP
A	13/11/18	Traffic signal proposals amended.	JW	JA

Status

FOR TECHNICAL APPROVAL

Client

**Redrow Homes
South West**

Project

**Land West of Farm Lane
Leckhampton**

Drawing Title

**S278 Moarend Park Road
Traffic Signals Highway
Improvement
Proposed Layout**

Drawing No.

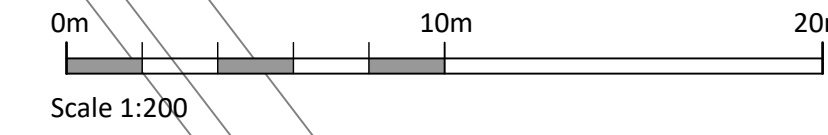
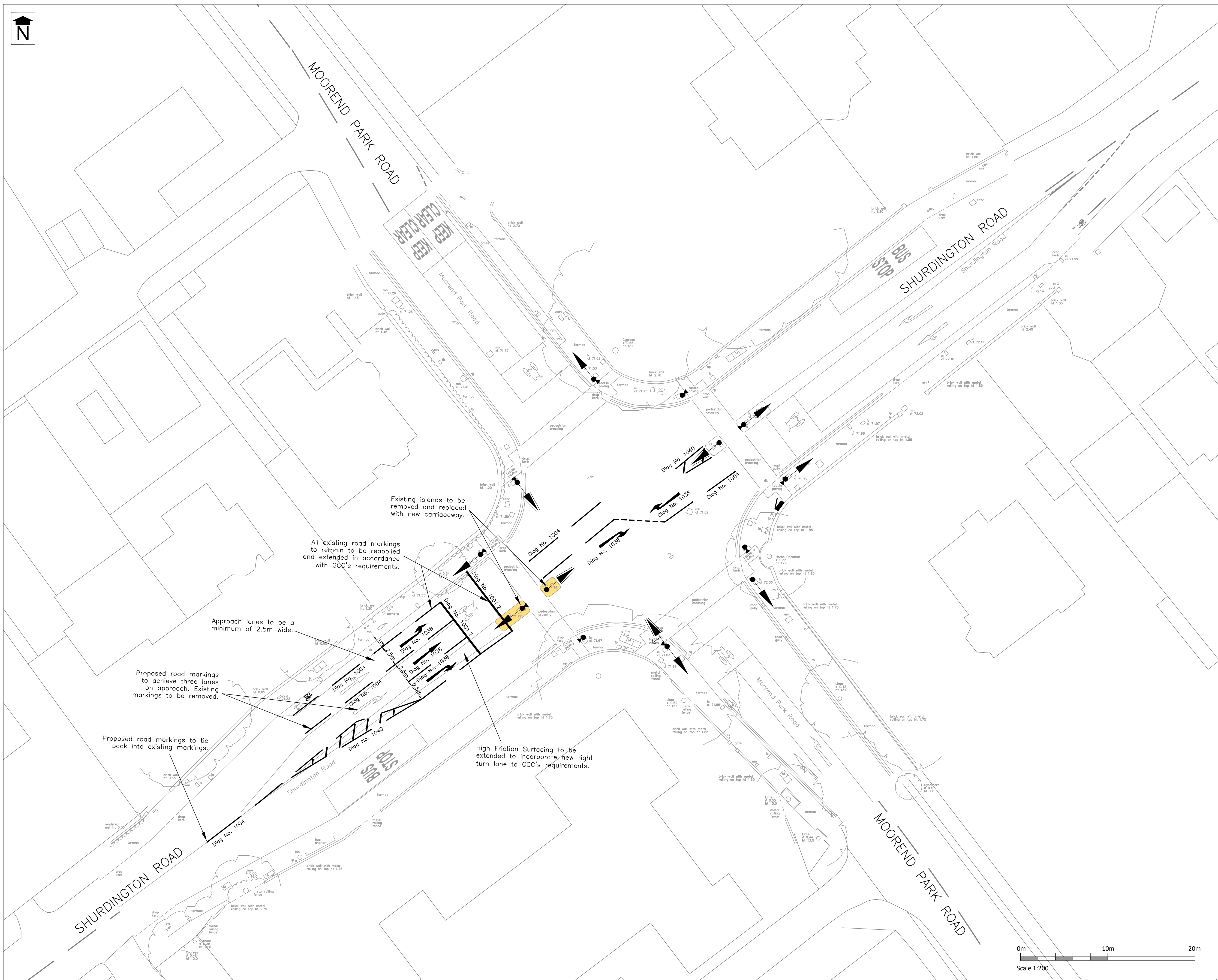
R322/36

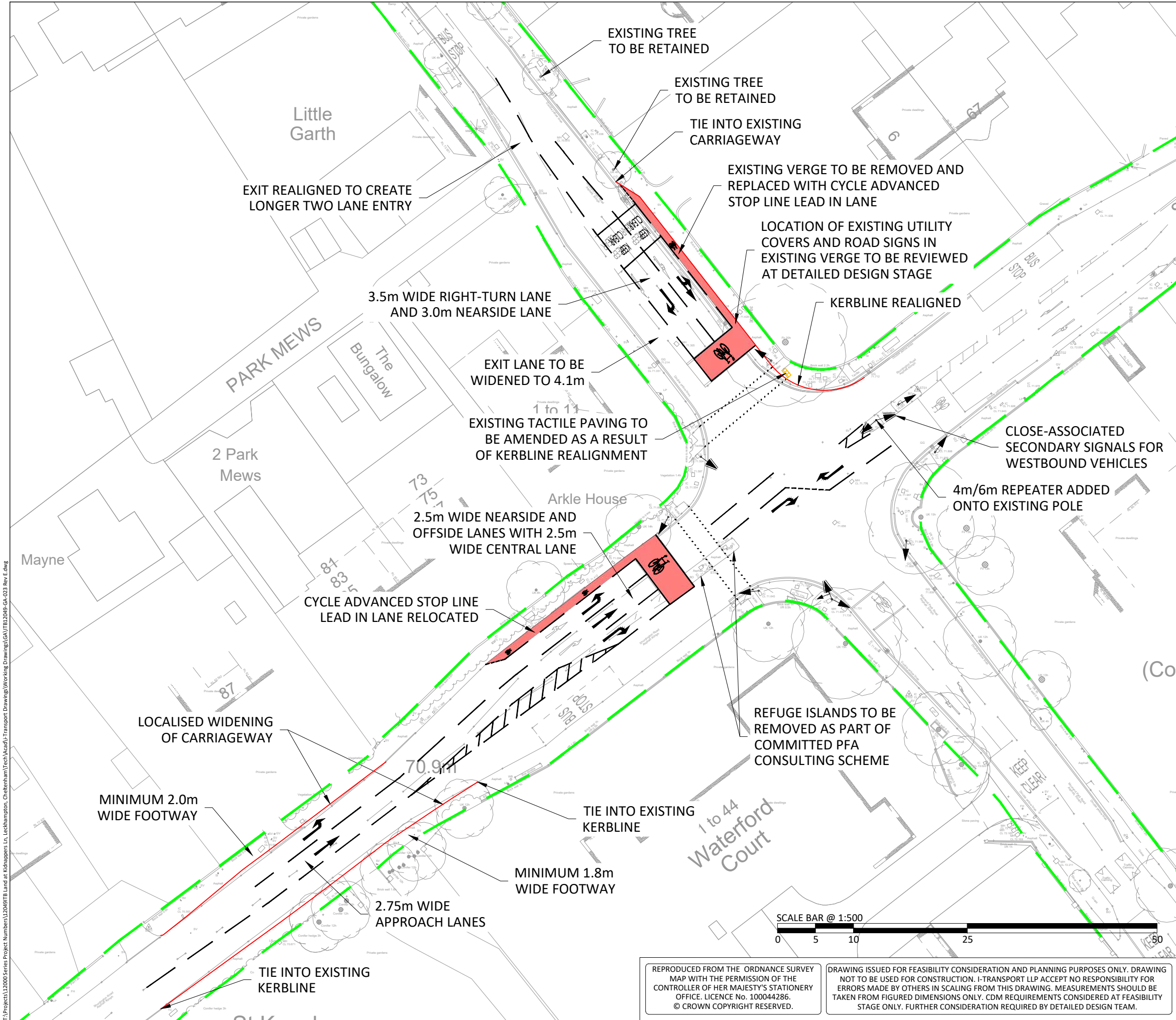
Rev A

Date: August 2018

Scale: 1:200 @ A1

E-Mail: jwoodward@pfapl.com





E	05.03.19	JD	MINOR AMENDMENTS	BT	MG
D	09.01.19	JD	MINOR AMENDMENTS	BT	MG
C	24.09.18	JD	MINOR AMENDMENTS	BT	MG
B	17.08.18	JD	MINOR AMENDMENTS	BT	MG
A	18.07.18	JD	MINOR AMENDMENTS	BT	MG
REV	DATE	BY	DESCRIPTION	CHK	APD

STATUS: FOR INFORMATION

i-Transport

Grove House, Lutyens Close, Chineham
Basingstoke, Hampshire, RG24 8AG
Tel: 01256 338640
Fax: 01256 338644

www.i-transport.co.uk

TITLE: PROPOSED AMENDMENTS TO A46 SHURDINGTON ROAD / MOOREND PARK ROAD JUNCTION

PROJECT: LAND TO THE SOUTH OF THE A46 SHURDINGTON, LECKHAMPTON

CLIENT: MILLER STRATEGIC LAND

SCALE @ A3: 1:500
CHECKED: BT
APPROVED: MG

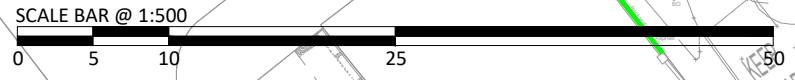
FILE REF: ITB12049
DRAWN: JD
DATE: 15.06.18

DRAWING No: ITB12049-GA-023

PROJECT No: ITB12049
REV: E

REPRODUCED FROM THE ORDNANCE SURVEY MAP WITH THE PERMISSION OF THE CONTROLLER OF HER MAJESTY'S STATIONERY OFFICE. LICENCE No. 100044286. © CROWN COPYRIGHT RESERVED.

DRAWING ISSUED FOR FEASIBILITY CONSIDERATION AND PLANNING PURPOSES ONLY. DRAWING NOT TO BE USED FOR CONSTRUCTION. I-TRANSPORT LLP ACCEPT NO RESPONSIBILITY FOR ERRORS MADE BY OTHERS IN SCALING FROM THIS DRAWING. MEASUREMENTS SHOULD BE TAKEN FROM FIGURED DIMENSIONS ONLY. CDM REQUIREMENTS CONSIDERED AT FEASIBILITY STAGE ONLY. FURTHER CONSIDERATION REQUIRED BY DETAILED DESIGN TEAM.



T:\Projects\12000 Series Project Numbers\120049ITB Land at Kidnappers Ln, Leckhampton, Chineham\Tech\Acad\Transport Drawings\Working Drawings\GA\ITB12049-GA-023 Rev E.dwg