



## Cheltenham, Gloucester & Tewkesbury District

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Major Tom Hancock, DL (Chairman)  
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24 November 2014

Mr Oliver Rider  
Planning and Development Services,  
Tewkesbury Borough Council,  
Council Offices, Gloucester Road,  
Tewkesbury, Glos GL20 5TT

Dear Mr Rider,

### **LAND AT LECKHAMPTON, CHELTENHAM**

#### **Planning Application 14/00838/FUL**

**Full application for residential development comprising 376 dwellings, including access and associated infrastructure, land to the west of Farm Lane Shurdington.**

Set out below are CPRE's comments on the above application.

#### **Introduction**

Although the area is neither within the Gloucester - Cheltenham Green Belt nor the Cotswolds AONB, it is nevertheless a highly sensitive location.

In 2007, this same site was the subject of a planning application, 07/01012/OUT, to build 360 dwellings. This was subject to an appeal against lack of determination: following a public inquiry, the appeal (APP/G1630/A/08/2066580) was dismissed by the then Secretary of State on 11 March 2009.

The site is covered by Policy SD2 of the Tewkesbury Local Plan to 2011 which is now out of date. Under this policy the site was allocated for development subject to the provisions of the SW Regional Spatial Strategy, which was in draft at the time of the 2007 application. Since the Regional Spatial Strategy has now been cancelled, this policy has lapsed.

Currently, the site occupies part of a strategic land allocation identified as 'South Cheltenham – Leckhampton Urban Extension' in the Draft JCS for Gloucester, Cheltenham and Tewkesbury which has very recently been submitted to the Secretary of State for examination.

It is essential to stress that the JCS has yet to be subjected to Examination in Public when critical aspects including both the underlying housing requirement and the Plan's achievability will be challenged. Because a site has been identified in the Draft JCS does not and should not lead to the presumption that any application submitted must be automatically approved. It must be considered on its own merits.

In this respect, CPRE has five principal but overlapping concerns, namely:

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- the lack of an agreed coherent overall plan for development of any South Cheltenham – Leckhampton Urban Extension, the larger part of which lies within Cheltenham Borough;
- the lack of infrastructure to support a development of this scale;
- the potentially significant adverse safety and environmental impact that traffic generated from the site would have, particularly on Church Road and Leckhampton Lane, and more generally by increasing congestion along the A46;
- the impact that the development would have on the setting of the Cotswolds AONB and the loss of high quality agricultural land. The site is highly visible from the escarpment to the south and in turn the view of the escarpment from the site is a highly valued feature of this part of Cheltenham, and
- the density, design and layout of this proposed development, including the provision of open space.

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### Lack of Coherent Planning

A principal reason why the 2007 application was dismissed at appeal was the lack of any coherent plan for development of the South Cheltenham urban extension (as then proposed in the draft RSS). The Secretary of State concluded that to allow the development would be likely to prejudice the development of the urban extension.

The same situation applies today in the context of the JCS proposals. This is reinforced by the refusal, on 31 July 2014, by Cheltenham Borough Council of an outline application (13/01605/OUT) for 650 dwellings and associated amenities on land to the north-east of the site. This adjacent development was proposed to include a range community facilities essential to support the increased in housing proposed for the area. It is evident that there is no agreed coordinated and coherent funded plan for the provision of infrastructure and other facilities in the South Cheltenham area. Approval of the current application in advance of such provision would be disastrous for the whole area. Some aspects of this are considered in further detail below.

### Traffic

CPRE is exceptionally concerned by the potential impact of the scheme on:

- Leckhampton Lane/Church Road and more generally upon traffic congestion on the A46
- existing and proposed junction capacities
- highway safety
- pedestrian routes and safety
- public transport including the physical ability of the A46 to accommodate a bus lane

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Church Road and Leckhampton Lane already suffer severe problems from existing traffic levels. Any increased use would therefore create very considerable additional road safety and environmental concerns along these narrow highways and for the existing residents of the area.

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

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CPRE has noted and supports the concerns expressed by Cheltenham Chamber of Commerce over increasing congestion along this route as a deterrent to existing and future employers locating in the town centre.

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

Whilst some aspects of highway safety have been considered it appears that no consideration has been given to the likely impact of increased traffic flows on accident statistics. Of particular concern is the provision of safe pedestrian routes and crossings on the A46, including the physical challenge of providing a footpath on its southern side. We also note the failure to provide a full "walking audit" to key facilities including schools. To compound all these potential problems it appears that the Shurdington Road is incapable of being adapted to incorporate a dedicated bus lane or other public transport priority measures.

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

### **Setting of the AONB**

Unlike the 2007 application, and the recent application in Cheltenham Borough to the north-east, the current proposals contain little if any provision of a buffer of undeveloped land adjacent to the AONB boundary. This is a major shortcoming as it would result in significant damage to the setting of the AONB. In particular, views from and to Leckhampton Hill would be adversely affected by the layout, design and massing of development currently being proposed by this poorly considered application.

Policy SD8 of the Draft JCS states that "All development proposals in or adjacent to the Cotswolds AONB will be required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and other special qualities. Proposals will be required to be consistent with the policies set out in the Cotswolds AONB Management Plan."

CPRE strongly supports the view of the Cotswolds Conservation Board that the narrow area of open space (described as a 'linear park') that borders the AONB does not provide a sufficient buffer of open space to protect the setting of the AONB.

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

### **Design and layout**

While CPRE may support relatively high housing densities in urban areas in order to limit the amount of land removed from the countryside, this does not apply to a site such as this, which would form the boundary between the town and countryside and which borders the AONB.

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The overall housing density of the site is higher than that proposed – and rejected – in 2007. It is also higher than that of adjacent housing, such as in and around Brizen Lane, and clearly represents an overdevelopment of the site. As a result, there is far too little open space in a development of this kind. Moreover, while there is some reduction in the height and density of housing towards the south of the site, there is, as noted above, only a minimal buffer of open land at the southern boundary (described as a 'linear park') where the site abuts the AONB.

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

The developer proposes that 20% of homes at the north-east end of the site will be 3 storey. These buildings would therefore be taller than adjacent existing properties. These proposals would undoubtedly adversely affect views from existing housing on Shurdington Road, on Brizen Lane and other nearby residential areas.

The application proposes that only 97, ie 26%, of the 376 homes will be affordable. This figure is significantly below the 40% contained in the draft JCS, a percentage which is well established for new developments of this kind. CPRE does not accept the appellant's arguments that the need for affordable housing should be reduced.

There is no provision of commercial or social facilities of any kind. It is deduced that the applicant is assuming that these will be provided by developments in Cheltenham Borough which have yet to reach even the planning approval stage.

## Conclusion

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

For the reasons given above, CPRE Gloucestershire strongly recommends that the application be refused.

Yours sincerely

Major Tom Hancock DL  
Chairman, CPRE Cheltenham Gloucester and Tewkesbury District

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The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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