

9 June 2015

Ms Joan Desmond  
Planning and Development Services,  
Tewkesbury Borough Council,  
Council Offices, Gloucester Road,  
Tewkesbury, Glos GL20 5TT

Dear Ms Desmond,

**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.**

Please refer to CPRE's letter of 24 November 2014 to Oliver Rider regarding the above planning application. This further letter takes account of the revised plans submitted by the applicant on or about 19 May 2015. It also takes account of the fact that the examination of the Pre-submission Draft of the Joint Core Strategy for Gloucester, Cheltenham and Tewkesbury is now in progress.

The revised application is for 369 dwellings as against the 376 dwellings in the original application, ie a reduction of only 7 dwellings.

In most respects, the revised application differs little from the earlier application so that all the observations and objections set out in CPRE's letter of 24 November 2014 remain valid. Thus, for the reasons given therein, we remain concerned at:

- 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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<i>Chairman:</i>	Major Tom W Hancock D.L. Saltway House, The George, Winchcombe, Glos GL54 5LJ. Tel: 01242 602173		
<i>Hon Secretary/</i>	David N Bayne	Hamfield House, Ham Road, Charlton Kings, Cheltenham GL52 6NG. Tel: 01242 237074	
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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.

There are two material changes in the application on which we wish to make additional comments, namely the increased buffer of undeveloped land adjacent to the AONB and the other changes in density, design and layout of the proposed development. In addition, since the original plans were submitted the situation regarding the Joint Core Strategy has moved on and this clearly needs to be taken into account. Comments on these aspects are set out below.

### **Prematurity in the context of the Joint Core Strategy**

It would be wrong to approve the application until at least the initial findings of the examination of the JCS are available. It is as yet far from clear that the JCS housing requirement or the strategic housing allocations will be endorsed, at least in their present form.

In addition the Inspector will be considering the strategy proposed in respect of the Green Belt. In this context, as part of the Green Belt Review carried out for the JCS, AMEC looked at potential additions to the Green Belt. They concluded (para 5.4.5 of the Review report) that, while overall the case for extension of the Green Belt is a limited one, the Farm Lane site that is the subject of this application had the strongest case. Table 5.3 of the Review notes that this land parcel effectively forms part of Green Belt segment SE3, being of similar land use and open character.

While it is not within the current Green Belt or within the Cotswolds AONB, the site is, nevertheless, a highly sensitive location bordering the AONB and is clearly an important part of the setting of the AONB. It is vital that the open land to the south of the proposed housing land be retained as open space in perpetuity and we have previously advocated designating this land as Local Green Space. Incorporating this part of the land within the Green Belt would also be a logical policy response, as the land clearly meets the requirements for Green Belt designation, and we are advising the examination Inspector accordingly.

### **Setting of the AONB**

While we welcome the proposed provision of a larger buffer of undeveloped land adjacent to the AONB boundary, this, when taken with the scale and density of the development as a whole is still insufficient to mitigate the impact of the proposals on the AONB. If approved the resultant development would result in significant damage to the setting of the AONB. In particular, views from and to Leckhampton Hill would be adversely affected.

As noted previously, 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.” This Policy would not be satisfied.

### **Design and layout**

Notwithstanding the changes, the housing density in the revised proposals remains far too high. It is higher than that proposed – and rejected – in 2007 and higher than that of adjacent housing, such as in and around Brizen Lane, Nourse Close and The Lanes areas. This represents overdevelopment of the site. There is hardly any open space within the built-up area itself.

Whilst the removal of three storey dwellings is welcome, we note that 2.5 storey dwellings have been retained and the overall massing and density is little changed. The revised

proposals would still adversely affect views from existing housing on Shurdington Road, on Brizen Lane and other nearby residential areas.

The individual houses proposed, especially those closest to the AONB, have standard suburban designs and materials which take little account of their siting. These would not be appropriate or acceptable in this sensitive location.

While we welcome the increase in the number of affordable homes to 35%, we note that this figure remains 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 still no provision of commercial or social facilities of any kind, so that the applicant continues to assume that these will be provided by developments in Cheltenham Borough which have yet to reach even the planning approval stage.

### **Conclusion**

For the reasons given above and in its earlier letter, CPRE Gloucestershire strongly recommends that the application be refused.

Yours sincerely

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