



Cllr Ian Bickerton, 3 Brizen Lane, Leckhampton, GL53 0NG

email: Ian.Bickerton@bristol.ac.uk

Tel: 01242 250473

Joint Core Strategy Team
Municipal Offices
Promenade
Cheltenham
GL50 9SA.

Joint Core Strategy Pre-Submission Public Consultation, August 2014

Firstly, the time and effort from officers on producing the Joint Core Strategy Pre-Submission Document is clearly evident and the set of evidence documents are of a high standard, thank you.

I have two related concerns with the draft Joint Core Strategy Pre-Submission which make the plan unsound, firstly the very large 30,500 housing growth to 2031 is unjustified, greater than 22% growth in housing, and secondly the large number of strategic green field sites being put forward to support the plan. Both these weaknesses can be easily rectified by bringing in the latest ONS/DCLG evidence and applying best practice from the Bristol Inspectorate. The level of housing growth for Cheltenham is not coupled to job creation nor matched to public services and the level of infrastructure identified by the C5 parish councils. The strategic site at Leckhampton has been included in the plan with inadequate sustainability work and scant attention to previous Inspectors reports nor evidence previously presented.

This response is in two parts, section one provides an objective analysis of the JCS Housing Targets with data and assistance from the Office of National Statistics (ONS), the Department of Communities and Local Government and the Bristol Inspectorate. The ONS have kindly provided up-to-date local data and analysis for the three districts as required by the NPPF, and the DCLG & Inspectorate have advised on best practice in preparation for Examination in Public (EIP) and verified the referenced data presented below.

Section two provides a summary of the sustainability evidence for the JCS Leckhampton Strategic Site covering Transport, Environmental and Flood Risk. Leckhampton with Warden Hill and Shurdington Parish Councils have repeatedly voiced the same sustainability concerns, this is a material consideration under the 2011 Localism Act, both councils, *'strongly believe that the Leckhampton fields should be protected as a local green space of special community value because of their high amenity, health and recreation, footpaths and walking, landscape, ecological and historical value and because of their proximity to the AONB and importance to the views from Leckhampton Hill'*.

Much of the environmental, transport and other site sustainability evidence for the C6 strategic site at Leckhampton can be found in the Leckhampton with Warden Hill Neighbourhood Planning Document, available on the link below, this also contains a strong application for a NPPF Local Green Space which needs to be considered under the JCS prior to the determination of any development applications.

http://www.leglag.org.uk/Welcome_files/Leckhampton%20with%20Warden%20Hill%20Parish%20Council%20Neighbourhood%20Planning%20and%20NPPF%20LGS%20Application.pdf

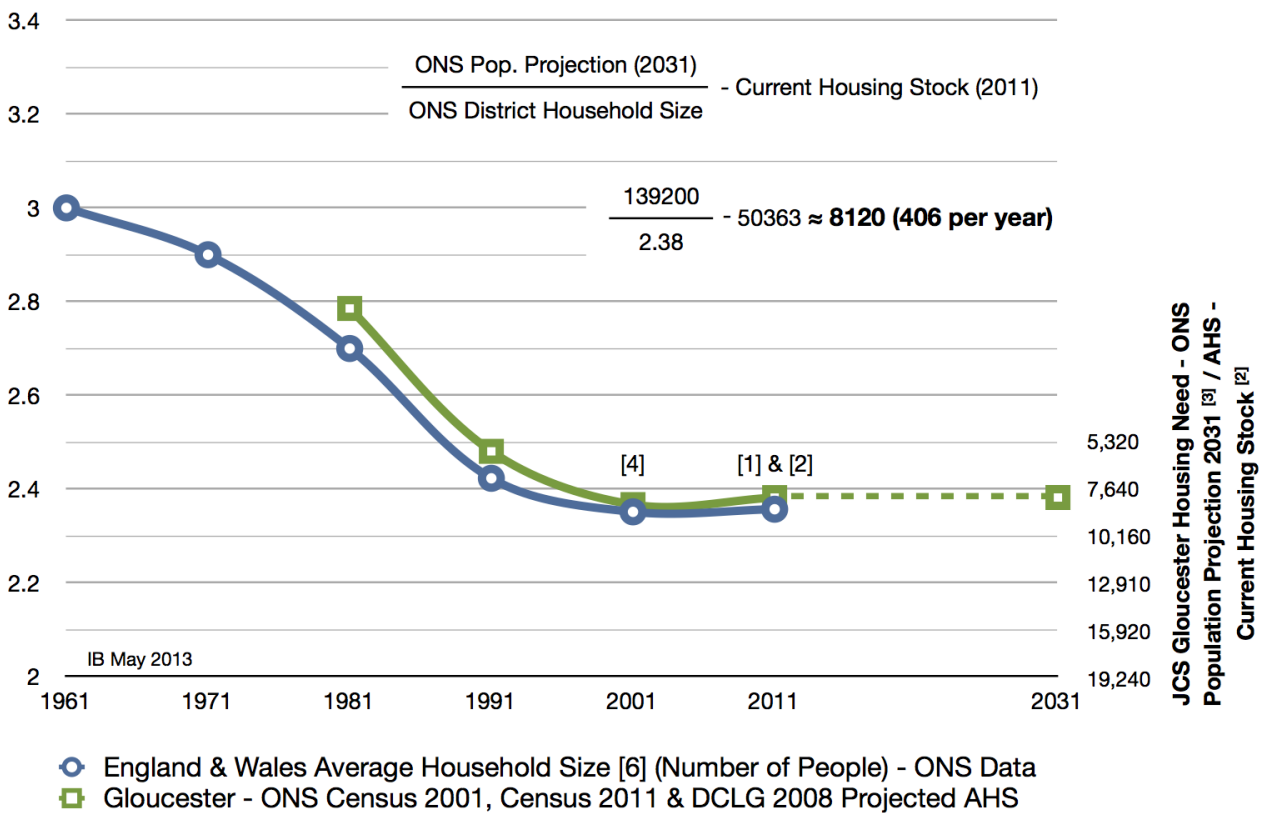
I would like the opportunity to present this evidence directly to the Inspector at the JCS Examination in Public and make myself available for questioning on the evidence and data provided in this response.

1 JCS Housing Numbers, an Objective Analysis

The Department of Communities & Local Government (DCLG) April 2013 report on household formation across England validated the views of hundreds of Cheltenham residents, many Parish Councils and organisations who got involved in the previous JCS Public Consultation. Average household sizes or the average number of people who live in a household has indeed stabilised over the last twenty years, DCLG highlight in their April report that, *'changes in population account for about 98 per cent of the household formation between 2011 and 2021 and the projections represent a decrease in average household size from 2.36 to 2.33 in ten years'*. The following charts below shows ONS census data, verified and referenced, for the three districts of Gloucester, Cheltenham and Tewkesbury. They provide the most up-to-date local data measured by the 2011 census, they are in agreement with the DCLG report showing broadly flat trends and not affected by short term fluctuations in the economy.

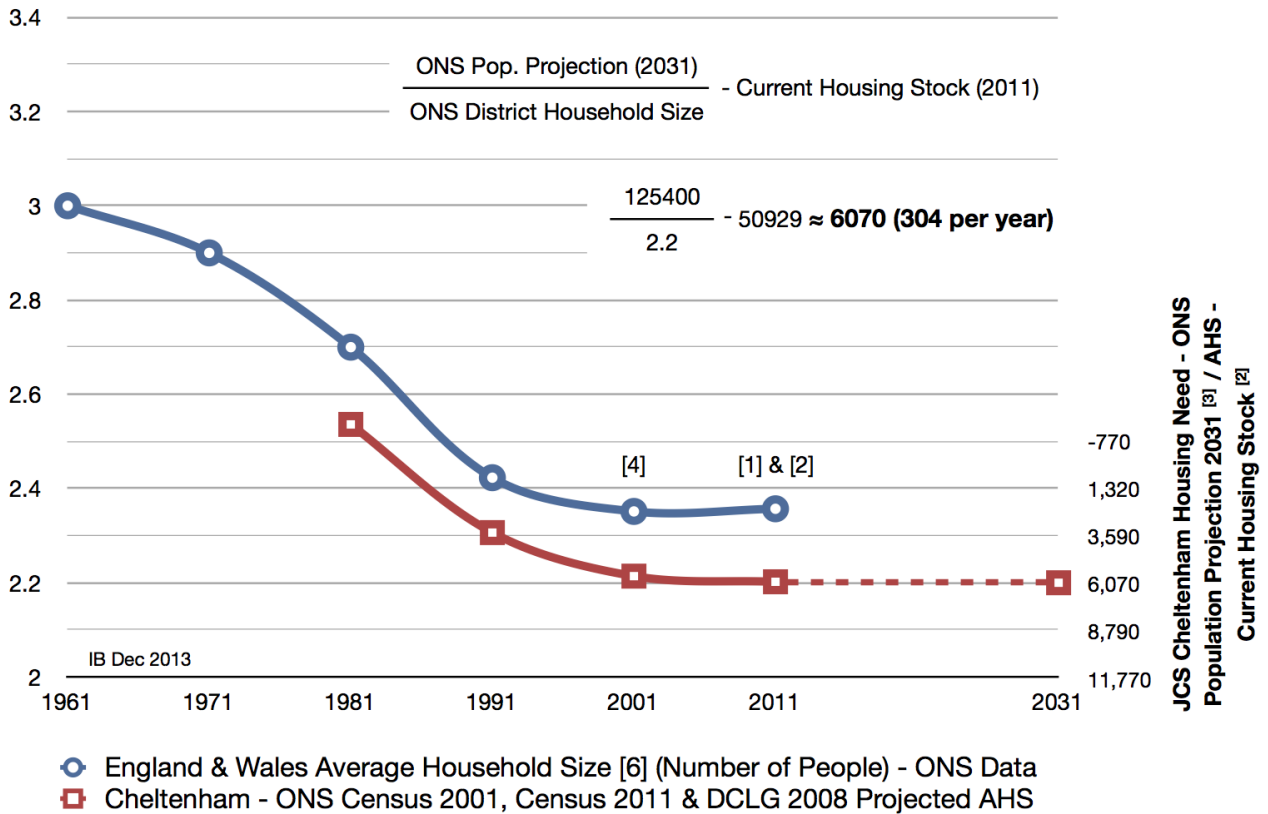
The Bristol Inspectorate have provided best practise on how to use the ONS household and population projections to calculate district housing targets, these calculations have been incorporated into the three district charts below. The housing requirement has been calculated from taking the district population at 2031 from the ONS long term population projections^[3] and accessing the household size from census data referenced on the chart. The axis on the left is household size and the housing numbers on the right are simply calculated from the 2031 long-term population projection divided by the average household size. The important calculation of housing need estimate is given on each district chart and the numbers used are all referenced together with their provenance.

JCS Gloucester Housing Target using ONS Population Projection and 2001/2011 Census for Household Size as per DCLG/Inspectorate Best Practice



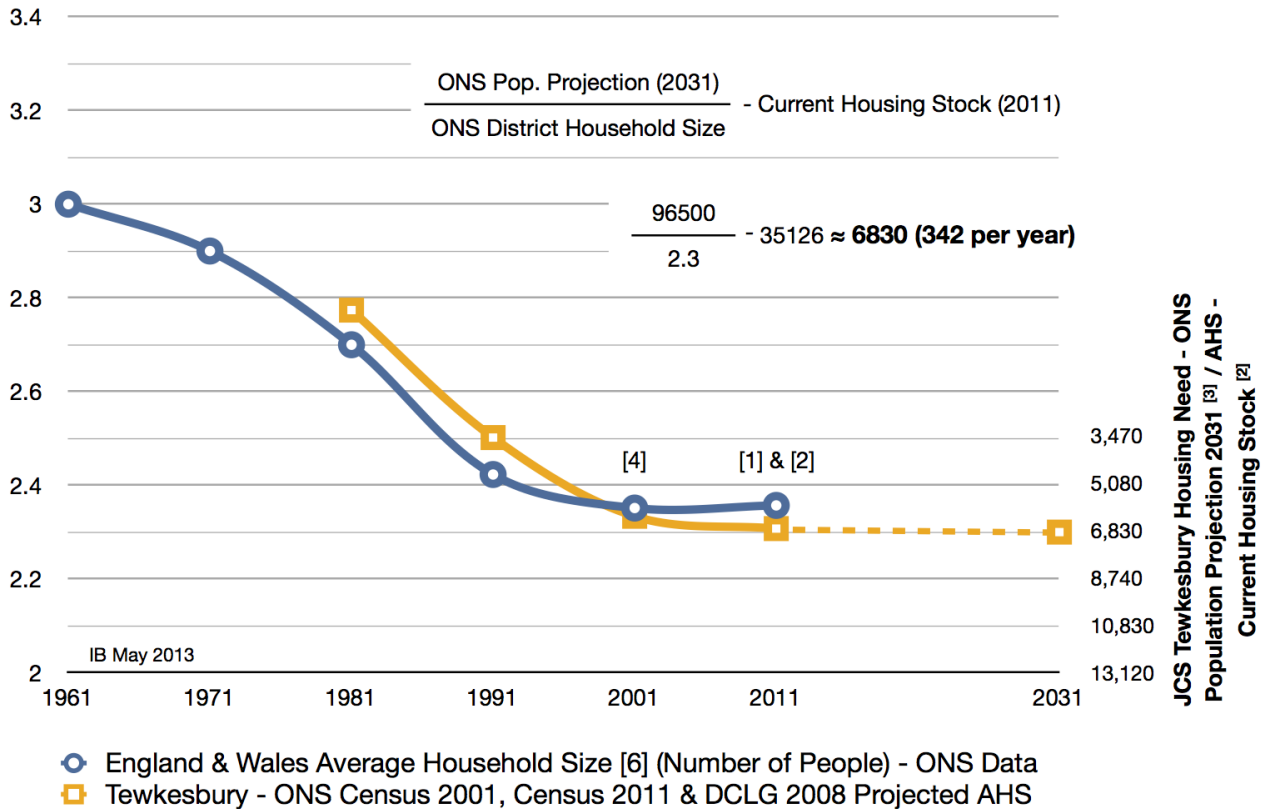
(1) ONS 2011 Census: Table KS101EW: Usual resident population, local authorities in England and Wales - Living in households
 (2) ONS 2011 Census: Table KS401EW: Dwellings, household spaces and accommodation type, local authorities in England and Wales
 (3) ONS 2010 Population Projection Table 2c: 2010-based Subnational Population Projections by sex and quinary age, Local authorities and higher administrative areas within London, South East and South West
 (4) ONS 2001 Census Key Statistics - Local Authorities Table KS01, Usual resident population and www.neighbourhood.statistics.gov.uk at local authority level
 (5) DCLG Table 406: Household projections by district, England, 1991- 2033 (ONS Pop. Projection divided by DCLG 2008 Housing Projection)
 (6) Statistical Bulletin 2011 Census Population and Household Estimates for England and Wales, March 2011. Coverage: England and Wales, Office for National Statistics, published 16 July 2012

JCS Cheltenham Housing Target using ONS Population Projection and 2001/2011 Census for Household Size as per DCLG/Inspectorate Best Practice



- (1) ONS 2011 Census: Table KS101EW: Usual resident population, local authorities in England and Wales - Living in households
- (2) ONS 2011 Census: Table KS401EW: Dwellings, household spaces and accommodation type, local authorities in England and Wales
- (3) ONS 2010 Population Projection Table 2c: 2010-based Subnational Population Projections by sex and quinary age, Local authorities and higher administrative areas within London, South East and South West
- (4) ONS 2001 Census Key Statistics - Local Authorities Table KS01, Usual resident population and www.neighbourhood.statistics.gov.uk at local authority level
- (5) DCLG Table 406: Household projections by district, England, 1991- 2033 (ONS Pop. Projection divided by DCLG 2008 Housing Projection)
- (6) Statistical Bulletin 2011 Census Population and Household Estimates for England and Wales, March 2011. Coverage: England and Wales, Office for National Statistics, published 16 July 2012

JCS Tewkesbury Housing Target using ONS Population Projection and 2001/2011 Census for Household Size as per DCLG/Inspectorate Best Practice



- (1) ONS 2011 Census: Table KS101EW: Usual resident population, local authorities in England and Wales - Living in households
- (2) ONS 2011 Census: Table KS401EW: Dwellings, household spaces and accommodation type, local authorities in England and Wales
- (3) ONS 2010 Population Projection Table 2c: 2010-based Subnational Population Projections by sex and quinary age, Local authorities and higher administrative areas within London, South East and South West
- (4) ONS 2001 Census Key Statistics - Local Authorities Table KS01, Usual resident population and www.neighbourhood.statistics.gov.uk at local authority level
- (5) DCLG Table 406: Household projections by district, England, 1991- 2033 (ONS Pop. Projection divided by DCLG 2008 Housing Projection)
- (6) Statistical Bulletin 2011 Census Population and Household Estimates for England and Wales, March 2011. Coverage: England and Wales, Office for National Statistics, published 16 July 2012

Collating the results from the previous three charts gives us the estimated housing need for all three districts, **Gloucester 8120, Tewkesbury 6830 and Cheltenham 6070 a total of 21,020**

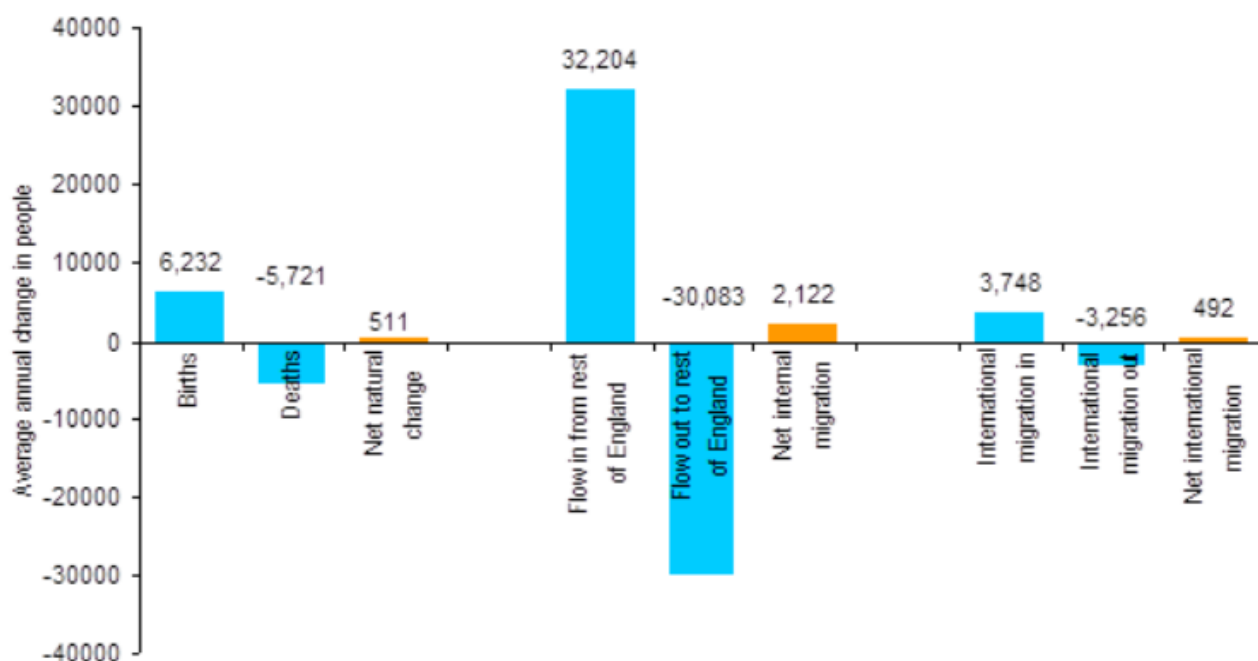
Why is there such a large difference between these objectively derived housing numbers and the JCS currently recommending a >22% growth in housing at 30,500 ? ... most of the reason is the population projections used.

The ONS Population Projections used above, comprises births, deaths, cross-border and international migration, with a **built in assumption of 8% economic growth to 2020 in the SW, and returning to pre-2008 growth rates to 2031**^[3]. The draft JCS does not provide a district breakdown of the numbers, very little data references nor how the housing target of 30,500 has been derived, only that an interim population projection has been used to 2031. The following analysis illustrates the reason for the large difference and explains the reason for the ONS warning put on that dataset.

The recent Echo article, 10th Oct. 2013, '*No Baby Boom in county as New-Borns total falls*', reported on the falling number of babies and population was very timely with important decisions on the Joint Core Strategy (JCS) being made on housing numbers. The article led us to look at the detail of how the county population was changing and the Office of National Statistics (ONS) and the Department of Communities and Local Government (DCLG) confirm the findings. Some recent county work has shown that the natural change, births minus deaths over the period 2001 to 2011 is just 511 per year. This work, the Strategic Housing Market Assessment, 9th May 2013 - by HDS Planning, looked at the detail of the county demographics, exactly where the population increase was coming from and the

numbers and threw up some surprises. As stated the natural population in the county, as measured by census, was 511 per year, net internal migration was 2,122 and net international migration 492.

Components of population change 2001 to 2010



Components of Population Change in Gloucestershire 2001 to 2010, annual average – JCS Strategic Housing Market Assessment, 9th May 2013 - HDS Planning

The fact that the natural increase in population had slowed was not expected in the population projections being used in the JCS and indeed in the new Housing Targets, in fact the ONS Interim population projection still has natural increases of population for Gloucester, Tewkesbury & Cheltenham (JCS area) estimated at **960/yr, 160yr and 610/yr** respectively, **total of 1730/yr which is three times the actual annual county increase seen in the 2011 census.**

Talking to the ONS, Suzanne Dunsmith (Head of Population Projections and author of the interim population projections being used by the JCS), explained the problem with this work and warned of the likely over estimate on birth rates on the interim projections and told us other validated projections are available published in the same year (2012) and advised us to use them. We hope the JCS officers will be looking at the numbers again and the population projection questions being raised here, of course, this makes a huge difference in the housing targets, some 24,000 people or 10,000 houses. Currently, the longer term and validated ONS population projections fit the county profile and the use of these figures should go some way into protecting the JCS greenbelt and open countryside.

Let's look at other objective source of data, the South West Observatory:

<http://www.swo.org.uk/census-2011/local-authorities/#.UfJw6wreSo>

POPULATION INCREASE 2001 to 2011, MEASURED BY CENSUS

Area	2011 Census	% change from 2001 Census
Gloucestershire	597,000	+5.7%

Population increase over the 10 years from 2001 to 2011, measured by census is 5.7%, not really too different from the England & Wales figure of 7.1%.

Again this shows the population is not growing at the rate built into the JCS assumptions, **5.7% population growth measured by census over ten years, JCS housing growth greater than 22% over twenty years**, this is a large mismatch.

Even the County Transport Plan LTP3^[8] April 2011 has detailed analysis on population growth:

*4.2.3 The mid 2008 population figure for Gloucestershire has been estimated as 582,581 people, which represented an average increase of 0.6% or about 3100 people per year since 1991. Tewkesbury, Cotswold and Gloucester had the largest increases in population between 1991 and 2008. Gloucester was the largest district in the county, followed by Cheltenham and Stroud. **Most of the population growth in the county over this period was attributable to net in-migration, which accounted for over 80% of the increase.***

In terms of areas of growth, the biggest increase is expected to continue to concentrate in the Districts of Gloucester (34,600), Cheltenham (12,000) and Stroud (10,600) between 2008 and 2033.

Again very different and much LOWER than the projections used by the JCS ...

This supports the evidence presented in the JCS Strategic Housing Market Assessment, components of population change above, we currently build many more houses to cover the inwards migration of 2614 per year, five times higher than our average natural increase in population of 511 per year. Where is this policy for this market driven housing and this large population increase (65,000) stated in the JCS? This is happening at a time when we are losing jobs in Cheltenham. Between 1991 and 2009 the number of jobs in Cheltenham fell by 7,600 (data source, JCS Evidence Base), the link between housing and jobs must be re-established.

Department of Communities and Local Government on Housing Projections for Cheltenham

Finally, let's look at the Department of Communities and Local Government, what housing figures do they project for Cheltenham. The DCLG provide housing projections for all England districts and have been a 'critical friend' on the JCS, published in April 2013. The DCLG are the recognised experts on household formation and are responsible for the England household formation model that underpins much of this work, **the Government DCLG housing projections are significantly LOWER than the JCS housing targets.**

Using DCLG Table 406, Household Projections by district, England, 1991- 2021 England Counties, London boroughs, unitary authorities and districts in England:

2011 Households 50,902 for Cheltenham

2021 Households 55,078 increase of 4176 or build rate of **420 houses/year**

JCS housing allocation to Cheltenham is 10,000 to 2031 or build rate of **500 houses/year**

Again, why is there such a discrepancy between the housing experts at the DCLG and the JCS Consultants ?

2 Sustainability of the JCS C6 Strategic Site at Leckhampton

2.1 Transport Planning for the proposed Leckhampton Strategic Site

Those who travel the A46 will know this entry point into Cheltenham is finely balanced and only just coping with the volume of traffic at peak times. In a recent planning application on Brizen Farm, Leckhampton, the developer was forced into admitting the highway network was at capacity and fell back on the argument that they would try to avoid worsening a poor situation.

The applicant's Transport Plan indicating that the situation is and will be so bad, that future residents will have to plan their journeys differently, change journey times (cannot work 9-5), use other transport modes, re-route (rat-running via Church Rd or past Bournside School) or suffer the consequences. It is difficult to see how vague plans to increase public transport provision or residential travel plan measures will fix an already 'failing network', a network that will be put under more pressure if large scale development were to be permitted. The simple assessment of the applicant's own transport plan tells residents what they already know, that the network in this area just cannot cope with additional traffic on the Shurdington Road corridor, the collision statistics demonstrate that the network is at capacity. In the GCC Transport Plan (LTP3) it states that the Leckhampton Lane/A46 junction is the most congested junction in the county, the only junction at 90-100% volume/capacity, the A46 is in the top 10 most dangerous roads in the county.

If housing development continues to the south of Cheltenham, along the A46 in the Leckhampton and Shurdington area it is likely that morning traffic queues will regularly extend onto the A417 and seriously impact jobs in the town, (see the traffic analysis in the LwWH Parish Council Neighbourhood Planning Document ^[1] for the complete evidence). Looking towards the town, the Bath Road from the Norwood Arms to the town centre, again seriously congested with delivery lorries, buses and slow moving traffic. There is no viable solution, widening the road is not feasible due to existing built-up stretches along most of the A46 Bath Rd.

Some of the A46 traffic turns off into Leckhampton Lane and along Church Road, as a 'rat-run' towards Charlton Kings. The volume of this traffic jumped by 30% when the Brockworth bypass was opened 11 years ago. Traffic is further squeezed by the parked cars, and frustrated drivers pose a real danger to the primary school children in the mornings. Traffic experts and county highway engineers have acknowledged that Church Road just cannot cope with any more vehicles and that junctions are at capacity.

More traffic means more air pollution. Measured against EU standards, levels are already unacceptably high on Church Road and at the A46 Moorend Road junction, regularly breaking NO₂ limits in the winter. CBC is very concerned on the increasing pollution in the town and has installed additional air quality monitors at these points and others. The whole town was recently declared an Air Quality Management Zone (AQMZ) to seek solutions, large scale development is NOT a solution it would of course compound the problem. Meanwhile, the JCS transport plan is delayed until January 2014, not available for this consultation.

Traffic volumes from in-commuters into Gloucester and Cheltenham from Stroud and Tewkesbury are a recognised problem. Congestion can potentially affect the economy of some areas. In order to tackle the congestion problem in the County, the Gloucestershire Economic Strategy has 'Reduce Urban Congestion' as one of its Transport and Infrastructure Policies.

The County Transport Plan^[8] 2011 to 2026, *'has addressed the national transport priorities at the local level and aligned these to four main themes:*

- *A greener, healthier Gloucestershire;*
- *Sustainable economic growth;*
- *A safer, securer transport system;*
- *Good access to services.*

None of these LTP3 themes would be promoted by adding further congestion to the A46 by moving ahead with large scale development at Leckhampton.

This would adversely impact on the local economy in Cheltenham, the LTP3^[3] reported, *'in the public consultation as part of the Cheltenham and Gloucester Connectivity Study, the headline findings were:*

- *40% of businesses felt that congestion had an impact on their business and*
- *79% were concerned about increasing congestion in the future;'*

The draft LTP3 has taken account of the five key goals from the DfT's 'Delivering a Sustainable Transport Strategy' (DaSTS), which are:

- *Reduce carbon emissions;*
- *Support economic growth;*
- *Promote equality of opportunity;*
- *Contribute to better safety, security and health; and,*
- *Improve quality of life and a healthy natural environment.*

Again these goals would be inconsistent with adding to the existing congestion to the south of Cheltenham, the A46 main route, Church Road and the Leckhampton Lanes

Outdoor air pollution has been officially classified as carcinogenic by the cancer arm of the World Health Organisation. The International Agency for Research on Cancer (IARC) said air pollution from traffic and industrial fumes was a definite cause of lung cancer and also linked to bladder cancer. The strong verdict from IARC, a cautious body that pronounces only when the evidence is strong, is putting pressure on governments to take action.

'The air we breathe has become polluted with a mixture of cancer-causing substances' said Dr Kurt Straif, head of the IARC monographs section, which assesses evidence and publishes official warnings. *'We now know that outdoor air pollution is not only a major risk to health in general, but also a leading environmental cause of cancer deaths'.*

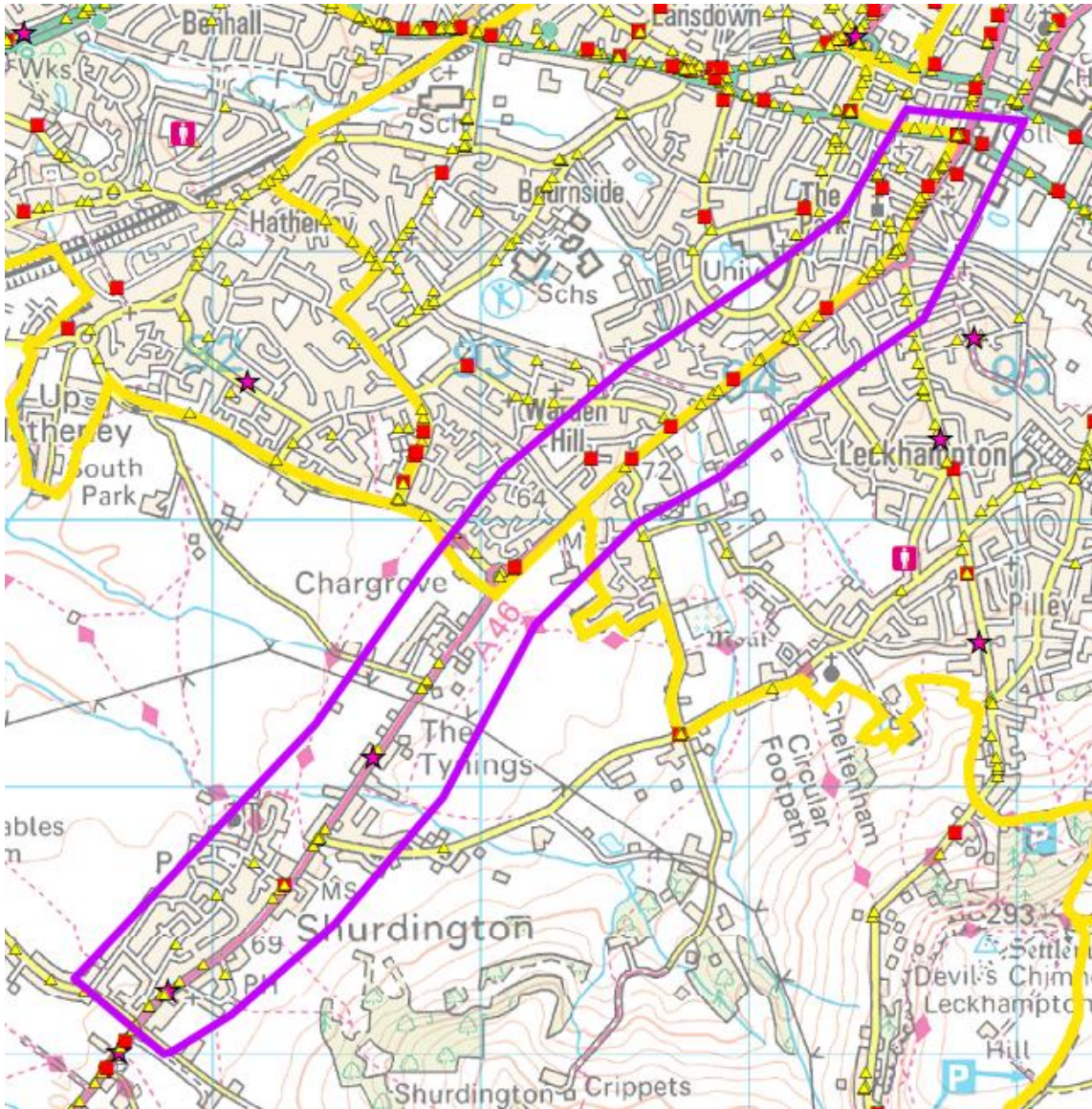
The Strategic Environmental Assessment of Gloucestershire's LTP3^[11] describes the link between ill health and poor air quality caused by transport and traffic congestion, *'4.3.1 Transport is a major contributor to poor air quality and associated health problems ranging from premature deaths caused by heart and lung disease to asthma. Adverse health effects can lead to a decreased quality of life, increased health costs (air pollution is estimated to lead to annual health costs of £15 billion)'.*

Official figures indicate air pollution causes around 4,000 deaths in London a year, 29,000 in Britain and two years or more off the lives of around 200,000 people a year.

<http://www.bbc.co.uk/news/uk-politics-17421601>

<http://www.bbc.co.uk/news/uk-england-hampshire-15585405>

The 10 year collision statistics provided by the County Accident Investigation and Prevention Road Safety Partnership shown below demonstrate a strong pattern in the accident statistics, of the 9 serious and 2 fatal accidents, these involved 4 cycles, 3 motorcycles, 3 pedestrians and only one serious accident was restricted to cars. This highlights the need for the separation of road users and other highway safety measures if the applicant's shift in transport mode is to be successful, the collision statistics also demonstrate the network is at capacity or near capacity.



Collision Plan Site:
A 46 Through Leckhampton
Data Range:
January 2003 March 2013
Date Produced:
May 2013
Collision Plan Key

Collisions
ACC_SEVERITY

★	Fatal
■	Serious
▲	Slight

2.2 Increased Flood Risk at Leckhampton & Warden Hill

The proposed JCS Strategic site at Leckhampton lies within the influence of a limestone hill that is overlaid with impermeable clay. The hill is peppered with springs with two main water courses, Hatherley brook and Ham brook. After heavy rain the ground water running off the hill is able to soak away into the fields east of the A46. During heavy rainfall conditions, even this natural defence is not enough to protect the homes in Warden Hill with over 40 homes flooded in 2007, they now struggle to get home insurance. In discussion with residents, their homes were flooded not from surface water but from water coming up through the drains, the drainage system failed due to sheer volume of water. In response a £650k flood protection scheme has been put in place, Warden Hill is now better protected; bizarrely all new development proposed for the area is on the other side of this flood barrier and in areas more prone to flooding from surface water.

Climate scientists predict extreme weather patterns will become the norm due to climate change, so these natural soakaways will become even more important. Proposals by developers featuring small 'balancing ponds' are an attempt to mitigate storm effects but this will not handle the 10 year events and development will increase the flood risk across the whole area. A detailed hydrological study carried out in 2010 states that the topography is more significant than the capacity of the brooks to cope with a flood event and the soakaways provide important protection.

The JCS evidence base has provided valuable information on the increasing flood risk to the Leckhampton area and is in agreement with surface flooding experienced by residents in recent decades.

The Gloucester, Cheltenham & Tewkesbury Joint Core Strategy Level 2 Strategic Flood Risk Assessment, HALCROW Summer 2011, report extract covering the Leckhampton area:

- *Significant surface water runoff is generated from the area to the south*
- *Areas of historic flooding identified outside the modelled flood risk areas*
- *Two key risk areas identified along Hatherley Brook (upstream Church Road & rural land adjacent to eastern branch), a number of existing roads affected by flooding*

Hatherley & Ham Brook in Leckhampton is identified as higher flood risk, a hydraulic model of Ham Brook is required, significant surface water runoff and an area of historic flooding, and highways are also affected. The Halcrow report again, *'where historical records show incidents of flooding and surface water, then these areas should be treated as Flood Zone 3a; at risk and not suitable for development. Areas of existing open space acting as informal flood storage areas should be safeguarded from development'*, the open fields at Leckhampton provide important protection of areas to the west of the Shurdington Rd from flood risk due to surface water. Halcrow state that, *'areas of existing open space acting as informal flood storage areas should be safeguarded from development'*.

This is the case in Leckhampton where open land is protecting Warden Hill where flooding has been a serious problem, a minimal flood protection scheme has been put in place on a small section of the Shurdington Road, it is worth noting that all proposed new development is on the other side of this barrier. The area of open countryside adjacent to the flooded area provides important protection to the wider area of Leckhampton Lanes & Warden Hill. Halcrow again, *'in some areas high hazard surface water risk areas affect locations outside of Flood Zones 2 and 3. Such areas should be treated as Flood Zone 3a with regard to the Sequential Test process'*, the heavy clay soil at Leckhampton regularly floods due to water run-off from Leckhampton hill.

The Catchment Flood Management Plans (CFMPs) for Gloucestershire show there are a number of sources of flooding in Gloucestershire including: surface water flooding through impervious surfaces; and, sewer flooding. Surface water flooding occurs across the Gloucestershire area including Cheltenham, Tewkesbury and Stroud. The Strategic Environmental Assessment of Gloucestershire's LTP3^[11] states, *'the risk from sewer and surface water flooding in Cheltenham is high due to the limited capacity of the old drainage system. The CFMPs outline the key risks to transport infrastructure on a catchment scale, one of the key roads that are at risk within Gloucestershire is the A46 and the Shurdington/Leckhampton'*. This section of highway has been badly affected in the past, development on the green fields in the proximity of Leckhampton Hill greatly increases the risk of severe surface water flooding onto the A46.

This whole area around Church Road (formally Collum Streete) has had problems with flooding, with tithing records dating back to medieval times due to the proximity of Leckhampton Hill.

2.3 Environmental Impact the proposed Leckhampton Strategic Site

The JCS Assessment/Capacity Testing, final report^[4], AMEC Environment & Infrastructure UK Limited, October 2012 report gives a useful summary of the high value of the open countryside at Leckhampton.

Located between the A46 Shurdington Road and the Cotswold AONB, this land forms part of the countryside which separates Cheltenham and Gloucester. The landform is gently undulating at around 70-80m AOD and land use is mainly pasture. Whilst woodland cover is limited, there is a large network of hedgerows, most of which are very well maintained at a variety of heights with occasional trees. This creates various levels of enclosure, giving an impression of a well-wooded landscape in flatter areas. There is very prominent landform and field pattern to the south adjacent to the AONB which is vulnerable to change and is considered to be a valuable landscape resource. Only a small area has limited intrinsic landscape value where previous character has already been lost. There are key views from national trail/PROWs within the AONB to the south of the area from Hartley Hill and Shurdington Hill. The area displays unusual land use patterns with many small holdings, orchards and allotment/market gardens with a good brookline and associated tree cover. This area displays a mosaic of habitat types with good connections to like habitat to the east, south and west.


C6 South Cheltenham, Leckhampton - overall sensitivity rating: high - medium

- *Very prominent landform and field pattern to the south adjacent to the AONB which is vulnerable to change and is considered valuable landscape resource.*
- *Only a small area has limited intrinsic landscape value as previous character has already been lost.*

- Primary key views from national trail/PROW's within the AONB to the south of the area from Hartley hill and Shurdington Hill.

The recent JCS Sustainability Analysis, also considers the land south of Cheltenham at Leckhampton, Table 1 summaries the report conclusions.

Table 1 JCS Sustainability Analysis – Leckhampton (Part of C6)

Summary Conclusion	Traffic Light Signal
'The broad location contains sites of biodiversity value'	RED
'Development of the site would be likely to lead to the fragmentation of important habitats'	RED
'The area displays a good mosaic of habitat types which could make mitigation difficult'	RED
For overall biodiversity impact, the site shows 'intimate rolling landscape, predominantly pastoral with improved and semi-improved pasture. Good hedgerow condition and good proportion of orchard ... good number of parkland trees and many veteran oaks along with other species. Small pockets of woodland dotted around the site. Area around Leckhampton displays unusual land use pattern with many smallholdings, orchards and allotment/market gardens. Good brookline and associated tree cover'	RED
It gives no rating, bizarrely, for climate change mitigation despite the obvious fact that loss of an overwhelmingly greenfield site would clearly have a major carbon impact, saying 'this objective is not assessed as part of the broad locations SA'	
It gives a GREEN rating on flooding despite the area's 3a rating from consultants Halcrow and the wide local knowledge that this land floods regularly	GREEN ?
It gives no rating for landscape sensitivity despite concluding that ' <i>the overall landscape sensitivity considered to be high</i> ' with ' <i>an impression of a well wooded landscape</i> ' and ' <i>a large network of hedgerows most of which are well maintained</i> '	
The JCS appraisal concludes that 95% of the site contains high grade agricultural land, therefore a puzzle as to why only but only a GREEN/AMBER rating is given.	GREEN/AMBER
It gives no rating to archaeological significance despite reporting a 'scheduled ancient monument at Leckhampton'	
In the JCs Public Consultation events, the public were asked to place RED (no development) and GREEN (development) stickers onto the town map, the result below was a typical result of the public trying to protect green space close to the Urban area.	RED
	

The Sustainability Analysis reports health impact only in terms of proximity to the nearest GP surgery. The natural benefits of green space to mental and physical wellbeing and the potential reduction in health inequalities ^[MIND] from free access to green space and recreation are not accessed. This results in an **AMBER** rating, given for other reasons.

Looking at the more critical questions asked about the value of the green space at Leckhampton:

Section 16 of the JCS Sustainability Analysis of Leckhampton, covering Green Space to Land to the south of Cheltenham (C6) of JCS Sustainability Analysis - (p118 of 171 in Appendix 1); critical questions have yet to be answered:

- 16a Does the location provide the opportunity for access to the countryside and natural environment? Yes/No
- 16b Does the site contains strategic open green space? Yes/No
- 16c Will it ensure existing open spaces are protected and enhanced? Yes/No

The feedback from the public in the JCS Consultation has been consistent and overwhelming on the value of Leckhampton Green Space. Thousands of petition signatures, marches, packed local meetings, hundreds of detailed submissions to the Joint Core Strategy consultation and before that numerous RSS consultations and local planning inquiries over 20 years from members of the public and representations from parish councillors, borough councillors, county councillors and MPs of all colours. The answer to these Green Space questions on Leckhampton must surely be YES, with a rating of **RED**.

In conclusion, this appraisal of the open countryside in Leckhampton within the JCS Sustainability Analysis provides good support to the LWWH Parish Council NPPF Local Green Space application.

Four inspectors have rejected large scale development on the Leckhampton white land in recent time, to quote Inspector David Asher, *“development of the objection site would materially harm the rural character and appearance of the area, and the important contribution that this makes to the landscape within the site and when seen from the AONB, the rural character up to the edge of the town which would be lost if development were to take place”* - CBC Local Plan Second Review to 2011 Inspector’s Report.

Table 2 – Recommendations from Previous Inspectors looking at large scale development in Leckhampton

Enquiry	Ref	Extract
Cheltenham Borough Local Plan Inquiry (1993) - Inspector's Report Cheltenham Local Plan Inquiry (1993) - Inspector's Report	6.92	The land at Leckhampton should be protected for its special historical, landscape and amenity value. It represents the last example of the gradual transition between the urban area and the countryside which characterised the Regency town. It should be considered anew for green belt or AONB status, for 'landscape conservation area' status, and as part of a Leckhampton Conservation Area (35A, 129W).
	6.95	The land at Leckhampton continues to be farmed with no indication of decline. The structure plan says that development which leads to additional traffic on Bath Road will be resisted, as improvements would be damaging to the environment. The present sewerage system cannot accommodate even limited development on the Leckhampton land, and the Hatherley Brook is loaded to capacity.
	6.97	The land at Leckhampton was originally omitted from the green belt with the proviso that the green belt notation might be extended if it appeared at a later date that it should remain open

		in the long term. The CELP [Cheltenham Environs Local Plan] Inspector concluded that the principles which guided the planners in 1968 applied equally in 1984, and that the land should not be green belt, but should remain open. I have had the benefit of new evidence concerning the character, appearance and historic interest of the land. I have walked over it and examined it from Leckhampton Hill, and reached my own conclusions on its merits. I have also examined Swindon Farm, which the CELP inspector was not asked to do. The GSPFA [Gloucestershire Structure Plan First Alteration]with its strategy of restraint, in great contrast to the high level of development which occurred in the 1980s, was approved only recently (in 1992). In my opinion these are material changes, which have occurred since 1984, in the circumstances surrounding the question of longer term development in Cheltenham.
	5.100	I believe that it would be very sad indeed if development were to proceed at Leckhampton, with its variety and interest.
	6.103	The land at Leckhampton appears from the latest available classification (MAFF 1) to be a mixture of Grade 2, 3a and 3b. Although not of the highest quality, the land is in my opinion sufficiently valuable for this factor to be given some weight if it ever becomes necessary to consider whether the land ought to be released.
	6.104	The Structure Plan supports the council's contention that Bath Road does not have the traffic capacity to support further development. There is insufficient evidence for me to draw conclusions about the drainage question: there is, at the least, serious uncertainty. Whether these constraints might be overcome in the longer term is not a matter which I need to address. However, they seem to me to be of such importance, and to have implications for such a wide area, that it is reasonable to conclude that the land at Leckhampton would need to be the subject of comprehensive development proposals if it were ever to be developed, as the council suggest. In the meantime, it should in my view continue to be protected from development.
Tewkesbury Borough Council Local Plan To 2011 Report Of Public Local Inquiry Into Objections PINSM/G1630/429/5 December 2003 - Mary Travers Ba(Hons) DipTP MRTPI - The Planning Inspectorate. Tewkesbury Borough Council Local Plan To 2011 Report Of Public Local Inquiry Into Objections PINSM-G1630-429-5 December 2003 Mary Travers.pdf	2.25.11	The site consists of four fields subdivided by substantial hedgerows that are interspersed with hedgerow trees. It has a gently rolling, topography and an attractive pastoral character that in my view links strongly into the landscape of the AONB immediately to the south of. Leckhampton Lane. Generally the contours fall from south to north and from east to west and there is a distinct ridge running roughly northwest-southeast through the site- -so that the south-eastern corner is the most elevated part. A public footpath that traverses the northern part of the site forms a link in a network of rural paths to the east and west of the site.
	2.25.12	As can be observed from public vantage points, the site is highly visible from within the AONB, for example from the lower slopes of Leckhampton Hill and from higher up at the Devil's Chimney. It is also visible partly from the west and in long distance views from the north. There is a substantial hedgerow on the western boundary with the Green Belt but this area drops away towards

		the Vale of Gloucester As a result, development on the more elevated south-eastern part of the site would be very conspicuous from the western approach along Leckhampton Lane where it would be seen within the context of the AONB. And looking southwards from the public footpath across the site it is apparent that development would. entail a significant intrusion into views of the open countryside and the AONB from the existing edge of the built-up area. It would also sever the link between the rural footpaths to the east and west of the site and replace it with one of an entirely different character. For these reasons and taking into account the scale of the proposed development, I consider that its visual impact on the surrounding countryside would be very significant and that it could not be easily mitigated.
	13.0	In addition, the site forms part of a swathe of open land that sweeps down from the Cotswolds to pass between Cheltenham and Gloucester and it provides a link between the AONB and the Vale of Gloucester. Development of the site would form an incongruous promontory in this open area, eroding the link and cutting off the rural land to the east of Farm Lane from the tract of countryside to the west. I do not consider that there are any differences in character or appearance between the Cheltenham Borough safeguarded land and the SH1 site that are so significant as to render this incursion less harmful.
Cheltenham Borough Local Plan Second Review 1991-2011 Inspector's Report, pp 187, DP527 8 March 2005 David Asher BA DipTP MRTPI. Cheltenham Borough Local Plan Second Review 1991-2011 Inspectors Report pp 187 DP527 8 March 2005 David Asher.pdf	10.147	I conclude on this issue, therefore, that the development of the objection site would materially harm the rural character and appearance of the area, and the important contribution that this makes to the landscape within the site and when seen from the AONB.

An important part of the JCS Evidence is the Entec/AMEC Greenbelt Review, May 2011, this report recommended consideration of land to the south of Farm lane, Leckhampton, be incorporated into the Green Belt and marked it RED –no development. The updated JCS AMEC Greenbelt report, Sept 2011, reinforced this view, *“land to the south of Cheltenham (south of Leckhampton, SW of Farm Lane) having the strongest case”*; the strongest case for additional Greenbelt in the wider JCS area.

Again, the LwWH Parish Council application for a NPPF Local Green Space, if granted would prevent the constant land speculation and expenditure of public money in the defence of this open countryside. It would also provide the vital stability necessary for investment, allowing longer term leases on the glebe smallholdings and investment in local food production; sustainable projects like zero carbon hydroponics and renewable energy. Various funding options for a city farm are being explored including the Big Lottery Fund and the Prince’s Countryside Fund.

3 Final thought on the JCS and over provision of Housing in Gloucester, Cheltenham and Tewkesbury

Tewkesbury MP Laurence Robertson, at a government debate on Planning, the Countryside and Housing Projections which he held in the House of Commons, 24th Oct. 2013, *'Tewkesbury Borough Council has built 7,500 houses in the last 20 years, but is planning to accommodate a further 18,900 in the next twenty years. I don't believe that this higher figure can be justified'*, and in response to Nick Boles defence of the building plans across much of England, *'... I don't agree with that analysis, certainly we need some development, and there are proposals I am currently supporting, but I don't accept that Tewkesbury Borough, for example, needs to increase its housing stock by 54% over the next twenty years, which, under current proposals, is what will happen'*.

In LEGLAG's view, this level of house building is an over-provision of housing supply and brings the danger of development coming forward too rapidly in less sustainable places (e.g. dispersed, more rural / dormitory settlement locations which all have local requirements) and, through competition effects, diverting development resources (e.g. infrastructure investment) from more sustainable but more difficult to develop places (e.g. inner urban brownfield land, in the continued regeneration policy of Gloucester & Cheltenham). This would result in what were largely intended to meet local growth needs being taken up by a higher proportion of inward migrants and commuters, and resulting in a perpetuation of the dispersed, car dependent settlement growth patterns. Over-provision in general would also place additional strain on existing infrastructure and could lead to investment in new capacity before it is required, representing a waste of scarce resources.

Yours Sincerely

Cllr Ian Bickerton CEng

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