



Cheltenham, Gloucester & Tewkesbury District

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Dear Mr C Hemphill,

LAND AT LECKHAMPTON, CHELTENHAM

Planning Application 13/01605/OUT for residential development of up to 650 dwellings; mixed use local centre of up to 1.94ha comprising a local convenience retail unit Class A1 Use (400sqm), additional retail unit Class A1 Use for a potential pharmacy (100sqm), Class D1 Use GP surgery (1,200sqm,) and up to 4,500sqm of additional floor space to comprise one or more of the following uses, namely Class A Uses, Class B1 offices, Class C2 care home, and Class D1 Uses including a potential dentist practice, children's nursery and/or cottage hospital; a primary school of up to 1.72ha; strategic open space including allotments; access roads, cycleways, footpaths, open space/landscaping and associated works; details of the principal means of access; with all other matters to be reserved. Land at Leckhampton Shurdington Road Cheltenham Gloucestershire

Set out below are CPRE's comments on the above application. In considering this application our comments cover a variety of concerns, including traffic issues, the impact upon the AONB and aspects of design and layout.

Introduction

The area is not within the Cheltenham Gloucester Green Belt or Cotswolds AONB, nevertheless this is a highly sensitive location.

The outline application occupies part of a strategic land allocation identified as South Cheltenham – Leckhampton Urban Extension in the Draft JCS for Gloucester, Cheltenham and Tewkesbury. The land allocation in the JCS identifies this area of South Cheltenham potentially as a suitable location for approximately 1,075 homes.

It is essential to stress that just because a site has been identified in the Draft JCS Consultation document it 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 three principal concerns namely:

- the effect that this scale of development would have in worsening traffic congestion along the A46 with consequential implications for existing employment in Cheltenham and elsewhere;
- 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 principles on which the design and layout have been based.

Traffic

CPRE is exceptionally concerned by the applicant's failure to provide a comprehensive analysis of the potential impact of the scheme on:

- traffic congestion on the A46
- junction capacities
- highway safety
- pedestrian routes and safety
- public transport including the physical ability of the A46 to accommodate a bus lane

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.

CPRE has noted and supports the concerns expressed by the Chamber of Commerce over increasing congestion along this route as a deterrent to existing and future employers locating in the town centre. In this respect the applicant's traffic projection of nearly a quarter (23%) increase requires the closest scrutiny.

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

Addressing the issue of landscape impact, we note that the applicant is proposing to protect, from future development, an area of open land to the south by way of a planning covenant as part of the s106 Planning Obligation. The application shows this area as allotments, a community orchard and strategic open space. It is essential that this open land is protected from development in perpetuity. Appropriate mechanisms could include designating the land as Local Green Space as provided for in the NPPF (paragraphs 76 and 77) or as a Village Green under Common Land legislation.

Additionally, a significant proportion of the site 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.

Policy S7 of the Draft JCS states that “Development proposals in and adjacent to the AONB will be required to conserve and enhance landscape, scenic beauty, wildlife, cultural heritage and other special qualities of the Cotswolds AONB and be consistent with the policies set out in the Cotswolds AONB Management Plan.”

Further the Cotswolds AONB Management Plan LK3 states – “The surroundings of the AONB are also important to its landscape character and quality. Views out of the AONB and into its surrounding areas can be very significant. Development proposals that affect views in and out of the AONB need to be carefully assessed in line with Planning Policy Statement 7 (now superseded by the equally strong protected landscape policies contained in paras 115 and 116 of the NPPF) to ensure that they conserve and enhance the natural beauty and landscape character of the AONB.”

We note that Cheltenham CBC endorsed the Cotswolds AONB Management Plan (2008 - 13), and included the following paragraphs in the Cheltenham Local Plan:-

Para 7.22 - "In assessing proposals for development, the Council will be guided by the advice of the Cotswolds AONB Conservation Board" and in Para 7.23 – that any revision of advice "issued by the Cotswolds AONB Conservation Board will be adopted by the Council and used as guidance for development control purposes". This formal policy must therefore form a key part of the Council’s context for assessing the current application.

All the above provide excellent reasons upon which to base a refusal and in addition we would stress that in seeking to protect the setting of the AONB it is of equal importance to consider the invaluable role the site plays in terms of its local amenity value and its open views of the AONB escarpment as part of the setting of Cheltenham.

Design and layout

In the centre of the site the Residential Density Plan shows a density of 41 to 55 dwellings per hectare. Normally CPRE supports relatively high densities for urban areas as a means to assist in reducing the land take from open countryside. However, in this case the proposed density is clearly inconsistent with the landform, location and existing adjacent housing and is therefore unsympathetic to its surroundings. Indeed, the Design and Access Statement’s claim that the average site density of 42dph is reflective of the nearby densities is highly questionable.

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.

This concern is reinforced by the proposal that housing fronting Shurdington Road would be at the highest density (40 to 55dph) in order to create a “strong sense of enclosure” and to reflect densities near the Bath Road. We believe that this is both an inappropriate approach to design on the site and a questionable analogy, as most areas adjacent to the Bath Road comprise retail uses with single storey storage or flats above.

The developer’s intention is that some 2.5 storey homes (up to a maximum of 20% in the vicinity of the local centre) will be provided. It is also the intention that 33% of the total provision is limited to 2 storey buildings. The taller buildings (over 2 storeys) therefore will be taller than surrounding existing properties. These proposals will undoubtedly adversely affect views from existing housing on Shurdington Road, Kidnappers Lane and other surrounding residential areas.

The developers’ claim to provide a view across the site along a main street which includes a square and runs from Shurdington Road towards the indicative open space needs close scrutiny. The presence of a square and 90 degree angle on this road would however obscure or prevent such a view being possible from the A46 to the area south of the site. This loss of view will be further compounded by the proposal for office buildings of 2.5 stories on the site. The applicant seeks to justify the proposal as needed to ensure the development is viable and to reflect building heights on the Bath Road is questionable.

First, the analogy with Bath Road is entirely inappropriate on this part of the A46. It suggests the developer is clutching at straws in an attempt to justify the design.

Second, not only will the offices be visually intrusive but also the statement suggests that any change to their design will threaten the viability of the proposal to provide a range of services, facilities and a relatively high proportion of affordable dwellings. It is therefore essential that this application is closely scrutinised by the Borough Council in order to determine whether:-

- its ‘offers’ to provide facilities and services are economically viable and sustainable or whether
- if permission were to be granted, a series of alterations will end up being proposed to the site whereby it ultimately ends up merely providing market housing and few facilities.

Importantly, at present, the application proposes that 40% of the 650 homes will be affordable. We note from the JCS Consultation Report that if market conditions dictate the level of affordable housing provision it will be revised in accordance with future SHMA reports. The uncertainty over the number of affordable houses that could potentially be delivered by this site is exceptionally unhelpful and indicates a concern over whether this application should be deemed to be ‘premature’ at this time.

We also note that the application includes the provision of a care home and that some associated facilities are proposed to be provided on site, such as shops, a pharmacy and a doctor’s surgery. However, the site is approximately 3km (1.8 miles) from other facilities provided in, or near, the town centre. Leisure facilities and the hospital for example are not readily accessible therefore this site may not be the best location for elderly residents.

The application also indicates that the existing doctors’ surgery at Moorend Park Road, Leckhampton is intending to relocate to a purpose built facility as part of the local centre hub on this site. Importantly, this practice serves a large existing residential area and patients can currently walk to the surgery. Any relocation will increase journeys by car to the new facility which will be beyond easy walking distance for many existing patients.

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 local residents and those accessing Cheltenham from the south.

Conclusion

CPRE Gloucestershire strongly recommends that the application be **rejected** on the grounds of its failure to provide a sustainable solution to the traffic issues highlighted in this representation, its impact upon the AONB and the local character and amenities of the area, **or** be **deferred** due to a lack of critical supporting information and its failure to meet the Draft JCS Consultation document requirement “to demonstrate how the strategic allocation can be developed as a comprehensive urban extension”.

Yours sincerely

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