

Leckhampton Green Land Action Group

Cheltenham, Gloucestershire

Secretary: Mrs Margaret White, 11 Arden Rd, Leckhampton
Chair: Cllr Ian Bickerton, 3 Brizen Lane, Leckhampton, GL53 0NG
www.leglag.org.uk

email: enquiries@leglag.org.uk

Tel: Ian 01242 250473 & Margaret 01242 523668

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The Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN

via email:
Mr Peter Kozak
Programme Officer
Peter.Kozak@pins.gsi.gov.uk

Final LEGLAG Submission to Inquiry APP/B1605/W/3001717 Leckhampton, CBC 13/01605/OUT

Dear Inspector Clark,

The purpose of writing again is to clear up some loose ends from our side on the Inquiry;

- The seven LEGLAG evidence points of Appendix 1, submitted by email 14/9, we apologise it has taken time to canvas support as instructed. Leckhampton with Warden Hill Parish Council have kindly responded in full and this response is provided in Table 1. Cheltenham Borough Council have yet to respond but would confirm to you directly the factual content on the majority of these evidence points, the Appellant, *'so as not to delay proceedings'*, refused all seven evidence points by email within the quarter hour.
- Clarification on the use of the Wainhomes Judgement in respect of the 5 year housing supply.
- Air Quality concerns for the Shurdington Rd and Church Rd communities in the consideration of Inquiry evidence and answers provided to LEGLAG questions.
- Traffic Modelling and the planned County Highways work in support of the ongoing Joint Core Strategy.

Leckhampton with Warden Hill Parish Council's response to the LEGLAG evidence points, received via email on the 1st November 2015.

Table 1: Parish Council's response to the seven points put forward by LEGLAG

1. Could we agree that the Shurdington Road (A46) is at capacity and any further traffic delay at peak times for northbound traffic caused by additional lights and volume would displace traffic from Shurdington Road to Leckhampton Village along Church Road, with this ongoing displacement continuing until the highways network achieves a balance on journey times.

Parish Council's response: The statement accords with the evidence that the Parish Council has presented to the Inquiry. With the current peak morning queue length on the A46, the journey from Shurdington to central Cheltenham via the A46 is not a lot longer in time than via the

(longer in distance) Leckhampton Lane – Church Road – Leckhampton Road / Moorend Road / Moorend Park Road (LL-CR-LR/MR/MPR) route. However, if the A46 queue consistently extends further than the Up Hatherley Way roundabout, the A46 route becomes sufficiently longer in time that the LL-CR-LR/MR/MPR route and traffic will divert onto that route to by-pass the A46 queue. This already happens on days when the traffic on the A46 is unusually high. As traffic from new housing lengthens the A46 queue, traffic will divert until Church Road jams completely. When this happens, as it did co-identally on the first day of the Inquiry, it creates traffic queues in all directions along Charlton Lane, up Leckhampton Road towards Leckhampton Hill, along Church Road west of Kidnappers Lane and along Kidnappers Lane. At present, the jam when it occurs can persist for up to 30 minutes or more before it is able to dissipate. The extra traffic from housing development will make jams in Church Road occur more frequently and possible even daily. Bovis-Miller spent a lot of time in 2012 and 2013 trying to find a solution to the problem. They submitted various schemes to public consultation including closing Leckhampton Lane completely. Finally in application 13/01605/OUT they proposed using one-way traffic flow sections (chicanes) along Leckhampton Lane to try to discourage the use of this route. They have now abandoned this proposal, which means that there is now nothing apart from jamming of Church Road that will limit the traffic flow via the by-pass route.

2. Could we agree that one of the major inspirations for the Rev. Charles Dodgson alias Lewis Carroll, for the enchanting children's story of Alice in Wonderland was the view from Leckhampton Hill across Leckhampton and the Severn Vale in the spring of 1863 on his walks with Alice, Lorina and Edith Liddle on holiday in Cheltenham.

Parish Council's response: Newspaper articles, including in the national press, have claimed that the view from Leckhampton Hill was the inspiration for the giant chess-board of fields and hedgerows in Alice Through the Looking Glass. There is reasonably good evidence that this is largely correct, although the evidence is entirely circumstantial. However, the Parish Council does not believe that this issue is germane to the Inquiry. In the public consultation in January 2015, no residents mentioned anything about Alice in Wonderland or Alice Through the Looking Glass apart from the one resident who sent an original copy of one newspaper article as a point of interest. The reasons that people value the view from Leckhampton Hill relate to its landscape quality, as explained in the various responses to question 6 of the public consultation; they do not derive from any association with Alice in Wonderland.

3. Could we agree that the most comprehensive report on the landscape appraisal of Leckhampton is the report commissioned by Cheltenham Borough Council in 2003: 'Landscape and Visual Appraisal, Final Report, Landscape Design Associates'. This report is independent and the Leckhampton area has not changed materially from its rural character of 2003.

Parish Council's response: The Council full agrees and has used the LDA report heavily in its evidence to the Inquiry on landscape.

4. Could we agree that It would be advantageous to the public purse and entirely logical to resolve the NPPF Local Green Space application submitted by Leckhampton with Warden Hill Parish Council in the August of 2013 and revised in January of 2015, with common ground to be established on the LGS as requested by Inspector Ord at the Joint Core Strategy Examination in Public (EiP) on Leckhampton (matter 8).

Parish Council's response: The Local Green Space application is a major part of the Council's evidence. The Council believes and has argued that it is in the national interest for the process of examination of the LGS application being conducted by Inspector Elizabeth Ord to be allowed to reach a proper conclusion, whatever this may be.

5. Could we agree that Cheltenham Borough Council requested that the original Bovis-Miller Planning Application 13/01605/OUT not to be submitted until the Joint Core Strategy and C6 South Cheltenham Master Planning was complete.

Parish Council's response: The Parish Council was not party to any discussions on this issue and cannot say whether the statement is correct. However, the Parish Council does believe that it is a serious weakness of the appellant's case that it relies so heavily on the JCS over which there are still some major uncertainties.

6. Could we agree that Cheltenham Borough Council voted unanimously in a resolution to request removal of the Leckhampton Strategic Site from the Joint Core Strategy on 28 February 2014. This was subsequently rejected by Tewkesbury Borough Council and Gloucester City Councils with minimal reporting.

Parish Council's response: The Parish Council believes this statement is correct. It is confirmed by the three Borough Councillors who are also members of the Parish Council, one of whom was the proposer of the resolution. The Parish Council included the minutes of the 28 February 2014 meeting as one of its evidence documents to the Inquiry.

7. Could we agree on the definition of 'severe' in the context of the NPPF paragraph 32 on Transport, specifically on the cumulative impacts of development, perhaps drawing parallels to the saving in journey time from Birmingham to London with the investment in HS2? This is a twenty minute saving for an investment of £43B (DOT) to £80B (IoEA), that 20 minutes must be important from a planning viewpoint and provides some guidance to the interpretation of the NPPF para 32.

Parish Council's response: The fact that the Government has not defined what 'severe' means has made it quite difficult for planners to make decision about sustainability from a traffic perspective. Gloucestershire Highways in the verbal evidence to Cheltenham Borough Planning Committee on application 13/01608/OUT on 31 July 2014 said that the traffic problem was not severe because it was possible to find traffic problems elsewhere that were more severe. However, this is not a good argument because it leads to the conclusion that traffic congestion is never severe because it is always possible that one could find worse congestion somewhere else. Gloucestershire Highways in their written evidence on 13/01605/OUT suggested analogies with 'severe weather'. The Oxford English Dictionary defines severe weather as 'e.g. a storm or heavy snowfall', which it not particularly rare. The Parish Council does agree with the CBC Planning Committee's judgement that the traffic problem posed by 13/01605/OUT is severe in the NPPF sense. In its evidence the Parish Council observes that Church Road provides the only road access to the 300 or so houses in Leckhampton Village and that if Church Road jammed frequently it would be a serious problem for residents. The Parish Council has also in its evidence noted the economic cost of traffic queues imposing long delays on commuters, wasting time and money and driving employment away from Cheltenham. The Parish Council also noted that the Government is proposing to spend around £250 million on upgrading the A417 up Crickley Hill (so-called 'missing link'). The main justification for this investment is economic, both for national transportation and locally for Cheltenham and Gloucester. In the Cheltenham context, it does not make good sense to make this investment to save 10 minutes or so of journey time on the A417 and then to inject a considerably longer journey time through allowing heavy congestion on the A46, which connects Cheltenham to the A417. In the end, however, it is not the place of the Parish Council to try to suggest definitions for 'severe'. It is for inspectors and courts to decide, and the current lack of definition does have the merit of allowing flexibility to inspectors to make a judgement about severity taking into account the specific context and details of the case concerned.

Wainhomes Judgement in respect of the 5 year housing supply

This was a difficult judgement by the honourable Mr Justice Stuart-Smith, and as with much of the case law quoted during the course of the Inquiry it is only by looking at the detail of these judgements that value can be gained.

In summary, five grounds were presented to Mr Justice Stuart-Smith, provided in paragraph 3 of the Approved Judgement, the extract below, which also includes the summary judgement at paragraph 4, is given below for ease of reference.

3. *By these proceedings Wainhomes advances five grounds of appeal, namely:*

- i) The inspector failed to have regard to a material consideration namely the two decisions at Calne or give reasons for not following the approach taken in those cases to the five year housing land supply;*
- ii) The inspector failed correctly to interpret the NPPF;*
- iii) The inspector gave inadequate reasons for the inclusion of strategic sites in the five year housing land supply and/ or the inclusion of the site was irrational;*
- iv) The inspector failed to take into account material considerations; gave inadequate reasons for concluding a five year housing land supply existed or otherwise behaved irrationally in so concluding;*
- v) The inspector made a mistake or otherwise reached a conclusion based on no evidence.*

4. *In summary, this judgment concludes that:*

- i) Ground 1 of the challenge is established. The inspector failed properly to exercise his discretion in deciding whether or not to admit the Calne decisions for consideration and failed to give proper reasons for his decision;*
- ii) The other grounds of challenge fail because when the Decision Letter is read fairly and with the reasonable latitude appropriate to a review of such decisions, it appears that the inspector made no material error of law, reached conclusions that it was open to him to reach on the material he considered, and gave adequate reasons for his decision.*

It was ground 1 that was established in this judgement, Inspector Mike Robins had failed to take into account some late evidence from two appeal decisions in the town of Calne, both within the same policy area of North Wiltshire, and this was in Inspector Robins consideration of the development at Widham Farm. Both locations were subject to the same County Strategic Planning, *'the issue involved consideration of whether the strategic sites included in Wiltshire's draft Core Strategy and Annual Monitoring Report should be included by the inspector when determining the supply of deliverable sites over the next five years'*.

What is critical here in the consideration of the relevance of the Wainhomes judgement to this Inquiry, Leckhampton, and the Joint Core Strategy. Both of these Carne appeal decisions concluded:

- *Limited weight can be given to the emerging Core Strategy due to the stage it has reached;*
- *There are concerns on the deliverability of commitments and emerging allocations;*

In Inspector Robins' decision letter he recognised the status of the emerging Core Strategy for Wiltshire ("eWCS"), *'the Council's ambitions for this plan to be adopted by the end of 2012 or early 2013 may, however, be questioned in light of recent concerns and a need to re-consult'*.

The JCS is at a more advanced stage, looking now to deliver 30,500 new homes, providing land to support 28,000 jobs, with strategic sites accounting for 12,800 of the total. The JCS is well evidenced, successfully through three comprehensive public consultations and has been awarded the prestigious Royal Town Planning Institute (RTPI) Awards for Planning Excellence 2015. The Inquiry agreed it was a matter of planning judgement as to how many homes the JCS can deliver in the five year period. In consideration of the five year supply, the OAN has been questioned by the Appellant, the Council subscribes to a figure of 9,100 currently being tested through the JCS EiP,

the DCLG 2012 housing projection for Cheltenham is 9,206^[1], this is the PAS recommended household projection baseline for Cheltenham which includes economic growth, the Appellant promotes a figure of 13,840 for Cheltenham; a figure not being put forward at the JCS EIP.

[1] Household projections for England and local authority districts, Release 2012-based, 27th February 2015, [Table 406: Household projections by district, England, 1991- 2037](#)

Hugh Lufton, Planning Consultant for LEGLAG, was heavily criticised for not knowing the detail of this Wainhomes ruling, from this analysis it is clear that more knowledge of the judgement would not have informed the detailed calculations, the implementation of the Sedgfield Method, nor the five year reconciliation using the Council sourced data. It is only the applied judgement on how many homes could be delivered within the early part of the JCS, all the parties agreed that this judgement was necessary; Hugh Lufton projects a little over 40% of the 455 annual JCS delivery goal. The stated policy for JCS Strategic Sites is, 'early phasing to ensure delivery in the plan period', this policy together with continued town regeneration using previously developed land, and with the start of new social housing build promoted by Cheltenham Borough Homes does not suggest that a 40% projected JCS delivery is excessive. It is also important to understand that the major Cheltenham strategic sites of Leckhampton and Swindon Village are not totally opposed by residents for the delivery of new homes, the [Cheltenham Alliance](#) recognises the need for new homes and that sustainable development is possible at both sites and should be included in any five year supply judgement.

The Wainhomes Judgement cannot be used to justify the complete removal of the JCS from consideration of the five year supply, the JCS is clearly more advanced than was the emerging Core Strategy for Wiltshire ("eWCS") when this Wainhomes Judgement was made. LEGLAG have considered the JCS position, the current EIP under Inspector Ord, the viability and sustainability of the JCS Strategic Sites, and the recent appeal decisions in Cheltenham. The most recent Appeal, APP/B1605/W/15/3019446, Cleavelands Drive, decision date 03/09/2015, in which the appeal was dismissed by Inspector Dawe, it is interesting that the Council's stated position was that it had a five year supply of deliverable housing land, a different judgement was being applied to the JCS, Inspector Dawe's conclusion on this issue was 'inconclusive'. However this serves to indicate the different judgements being applied in both evidence presented and appeal decisions, to reduce the JCS delivery to below windfall levels over the next five years given the set of circumstances presented would need a great deal more evidence than is currently provided by the Appellant.

LEGLAG are in agreement with the Parish Council in that sustainable development is deliverable at Leckhampton, however we do need the vital master-planning to achieve this goal. The contentious questions being dealt with by the JCS EIP are the detail of the OAN, the retention of local green space enjoyed by so many residents in the town, transport issues and attaining the right level of infrastructure investment; this community involvement should not be punished in non-plan led piecemeal development.

Air Quality concerns for the Shurdington Rd and Church Rd communities

To inform planning decisions on the issue of Air Quality the NPPF Planning Practice Guidance (PPG) is very helpful, and this is provided in full below for ease of reference. There is still great uncertainty on what levels of air pollution will result if the Bovis/Miller 650 development were to be accepted without change.

These were the three questions raised by LEGLAG on the matter of Air Quality:

- 1. We know CBC have diffusion tubes measuring the monthly Nitrogen Dioxide (NO₂) levels on a monthly basis on the Shurdington Road and Church Road and that the levels in the winter months break the EU limits, have you completed more accurate real time measurements or surveys of air quality looking at the NO₂ levels at peak traffic congestion times ?*
- 2. Have any measurements been made on 2.5 and 10u particulates in the locality of the proposed development, the residents are concerned about the level of this type of air pollution with the new medical evidence. Again the important locations would be the A46 Shurdington Rd/Moorend Rd traffic lights and Church Road at peak traffic periods, can any data be supplied?*

3. Given that the whole of Cheltenham is now a Air Quality Management Zone (AQMZ) have you assessed the impact on cold engine cars exiting the proposed development entering a highly congested highway network at the main access points, these points are the Shurdington Rd and Church Rd. and the impact on air quality with potential queuing within the development.

In the brief answers provided by the Appellant's Expert Witness, it was ascertained that no additional testing has been completed to support this application, neither NO₂ nor the 2.5/10u particulates and no consideration has been given to cold start engines entering two highly congested areas of Cheltenham. What we do know is that air quality is poor on both the Shurdington Rd and Church Rd, both are highly traffic congested (ref, previous Inquiry evidence and county reports), both breaking the EU regulations in the winter months, monitoring is totally reliant on two monthly diffusion tubes provided by the council. The siting of both these diffusion tubes is less than ideal, both being downwind of the prevailing south-westerly and the Shurdington Rd monitoring site is some 100m distant from the Moorend Road traffic lights. The Defra Local Air Quality Management Technical Guidance LAQM.TG(09) Feb. 2009 makes it clear, 'it will be critical to ensure that these sampling locations take into account those places where concentrations are expected to be the highest, and where the public may be exposed over the relevant averaging period of the objectives'. For a strategic site of this importance and given that Cheltenham Town has been made a Defra Air Quality Management Zone (AQMZ) an accurate assessment of current air pollution is warranted, some would say vital; this work is planned by the Parish Council in the course of Neighbourhood Planning and the Master Planning with Cheltenham Borough Council.

It has been demonstrated at the Inquiry that this development has the potential to significantly affect traffic in the immediate vicinity, on both the proposed development site and further afield, please reference bullet 1 of the NPPF PPG below. We simply request the time to complete this important assessment work on Air Quality, work that will better inform the Master Planning in achieving improved sustainability for this development.

NPPF Planning Practice Guidance - When could air quality be relevant to a planning decision?

Paragraph: 005 Reference ID: 32-005-20140306

Whether or not air quality is relevant to a planning decision will depend on the proposed development and its location. Concerns could arise if the development is likely to generate air quality impact in an area where air quality is known to be poor. They could also arise where the development is likely to adversely impact upon the implementation of air quality strategies and action plans and/or, in particular, lead to a breach of EU legislation (including that applicable to wildlife). The steps a local planning authority might take in considering air quality are set out [here](#).

When deciding whether air quality is relevant to a planning application, considerations could include whether the development would:

- Significantly affect traffic in the immediate vicinity of the proposed development site or further afield. This could be by generating or increasing traffic congestion; significantly changing traffic volumes, vehicle speed or both; or significantly altering the traffic composition on local roads. Other matters to consider include whether the proposal involves the development of a bus station, coach or lorry park; adds to turnover in a large car park; or result in construction sites that would generate large Heavy Goods Vehicle flows over a period of a year or more.*
- Introduce new point sources of air pollution. This could include furnaces which require prior notification to local authorities; or extraction systems (including chimneys) which require approval under pollution control legislation or biomass boilers or biomass-fuelled CHP plant; centralised boilers or CHP plant burning other fuels within or close to an air quality management area or introduce relevant combustion within a Smoke Control Area;*
- Expose people to existing sources of air pollutants. This could be by building new homes, workplaces or other development in places with poor air quality.*
- Give rise to potentially unacceptable impact (such as dust) during construction for nearby sensitive locations.*

- *Affect biodiversity. In particular, is it likely to result in deposition or concentration of pollutants that significantly affect a European-designated wildlife site, and is not directly connected with or necessary to the management of the site, or does it otherwise affect biodiversity, particularly designated wildlife sites.*

Revision date: 06 03 2014

Traffic Modelling and the planned County Highways work in support of the ongoing Joint Core Strategy

The evidence being presented at the Inquiry on the deficiencies in the traffic modelling supporting the planned development were cleverly likened to 'a rotten plank' by Mr Cahill QC, 'but better than no plank at all'.

With respect, we would like to remind all parties that this view is shared by the Cheltenham Chamber of Commerce in their letter to the Planning Committee, real concerns from the CE Michael Radcliffe on transport issues for Cheltenham, dated 31st July 2014. *'Good maintenance of access to the town from the south is vital for a successful high level strategy but unfortunately the current level of JCS traffic modelling in the assessment of development of Leckhampton has some perceived gaps ... Our request is that this application at least be deferred until more detailed traffic modelling has been completed under the JCS, enabling the Planning Committee to take a more informed view upon the impacts in this letter and by other concerned parties.'* The full CofC letter is provided in our Proof of Evidence.

However, it is possibly the professional input from County Highways which is even more compelling, Ben Watts, Senior Planning Officer - Strategic Planning on the 15th September 2015, states the position on their role and the JCS Traffic Modelling. *'Our role is to work alongside the JCS authorities, and Highways England, to develop a robust transport evidence base which fulfils the requirements of the National Planning Policy Framework (NPPF) & Planning Practice Guidance (PPG) 'Transport evidence bases in plan making and decision taking' and Government Circular 02/2013.'*

'The work undertaken to date by the JCS authorities, in our view, does not meet these requirements, and the County Council as Local Highways Authority, is not in a position to agree a transport strategy for the JCS. Amey consultants have subsequently been commissioned by the JCS authorities to address this shortfall in the transport strategy. This work is currently scheduled to be completed by Spring 2016.'

In his earlier email of the 8th September 2015 Ben Watts states:

'To clarify Amey have been commissioned to work with GCC, Highways England and the JCS authorities produce the Transport Evidence Base for the JCS. This will include a review of the existing evidence base and the use of an updated highways model to inform the identification of a preferred transport strategy. The new highways model is expected to be available late 2015 and an updated evidence base available spring 2016.'

This series of statements from the county officers highlights the need for evidence based master planning, this has been called for by Cheltenham Borough Council in this Inquiry, please allow the time for this important work to be completed, and let us together achieve the sustainable development promoted by the NPPF.

Yours Sincerely,
Ian Bickerton CEng, MIET

Appendix 1

LEGLAG Inquiry email of the 14/9 seeking Common Ground on seven evidence points

On 14/09/2015 15:33, LEGLAG wrote:

Dear Peter,

LEGLAG will be represented and led by Dr Ashley Bowes of Cornerstone Barristers and Mr Hugh Lufton of Lufton Associates with the objective of providing concise material evidence at the Inquiry, minimising inquiry time to make our case and be better able to respond in cross examination. Having taken advice, Ashley has agreed to our upper estimate of four hours of inquiry time to present our case, and will provide the detail separately.

We would appreciate any steer from the Inspector or yourself on how we can be efficient in presenting our case and in responding to the other participants, some of the emails being flashed around discussing time wasting, additional costs and lack of common ground are causing concern.

To explore common ground before next week and during the course of the Inquiry we would like specifics to be raised:

- Could we agree that the Shurdington Rd (A46) is at capacity and any further traffic delay at peak times for northbound traffic caused by additional traffic lights and volume would displace traffic from the Shurdington Rd to Leckhampton Village along Church Rd, with this ongoing displacement continuing until the highway network achieves a balance on journey times.
- Could we agree that one of the major inspirations for the Rev. Charles Dodgson, alias Lewis Carroll, for the enchanting children's story of *Alice in Wonderland* was the view from the hill across Leckhampton and the vale of Evesham in the spring of 1865 on his walks with Alice, Lorina and Edith Liddle while on holiday to Cheltenham.
- Could we agree that the most comprehensive report on the landscape appraisal of Leckhampton, is the report commissioned by Cheltenham Borough Council in 2003, Landscape and Visual Appraisal, Final Report, Landscape Design Associates, this report is independent and the Leckhampton area has not changed materially from its rural character of 2003.
- Could we agree that it would be advantageous to the public purse and entirely logical to resolve the NPPF Local Green Space application submitted by Leckhampton with Warden Hill Parish Council in the August of 2013 and revised in January of 2015, with common ground to be established on the LGS as requested by Inspector Ord at the Joint Core Strategy Examination in Public (EiP) on Leckhampton matter 8.
- Could we agree that Cheltenham Borough Council requested that the original Bovis/Miller Planning Application, 13/01605/OUT not be submitted until the Joint Core Strategy and C6 South Cheltenham Master Planning was complete.
- Could we agree that Cheltenham Borough Council voted unanimously in a resolution to request the removal of the Leckhampton Strategic Site from the Joint Core Strategy on the 28th February 2014, and that this was subsequently rejected by Tewkesbury Borough and Gloucester City Councils with minimal reporting.
- Could we agree on the definition of 'severe' in the context of the NPPF paragraph 32 on Transport, specifically on the cumulative impacts of development, perhaps we could draw parallels to the saving in journey time from Birmingham to London with the investment in HS2, this is a twenty minutes saving for an investment of £43B (DoT) to £80B (IoEA), that 20 minutes must be important from a planning viewpoint and provides some guidance to the interpretation of the NPPF para 32.

We provided a reference list of documents in our proofs of evidence, please see below, could these please be added to the electronic library for the Inquiry, we take note of the Inspector's preference for hard copy and will try to provide printed copies in week one.

1. LEGLAG Statement of Case 31st July 2015

2. Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013, [published here](#)

3. Leckhampton with Warden Hill (LWWH) CBC Checklist, including maps and environmental information [published here](#)
4. Land at Farm Lane, Church Road, Leckhampton, Cheltenham, Landscape and Visual Appraisal, Final Report, Landscape Design Associates – July 2003, [published here](#)
5. Leckhampton with Warden Hill Parish Council Report on the Leckhampton LGS Public Consultation, A Mears April 2015
6. Joint Core Strategy Site Assessment/Capacity Testing, Final Report AMEC Environment & Infrastructure UK Limited October 2012
7. Martin Horwood, letter of objection to 13/01605/OUT, dated 9th Jan. 2014 and statement made to the CBC Planning Committee 31st July 2014 on the residential development of up to 650 dwellings at Leckhampton, published here [letter](#) and [statement](#).
8. Gloucestershire's Local Transport Plan 2011-26 - Promoting a safe and sustainable transport system, April 2011.
9. Strategic Environmental Assessment of Gloucestershire's Third Local Transport Plan 2011-2026 Environmental Report: Post-Consultation Document, January 2011, Gloucestershire County Council, Halcrow Group Limited.

Best Regards
Ian Bickerton
Chair LEGLAG Ltd.
01242 250473