

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
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Mr Adam White,
TBC Planning,
Tewkesbury Borough Council,
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PUBLIC CONSULTATION ON THE REDROW PLANNING APPLICATION, FARM/LECKHAMPTON LANES 14/00838/FUL

Dear Mr White,

We have studied the REDROW proposal for the area known as White Cross; this area is particularly sensitive being adjacent to the Cotswold ANOB and makes an important contribution to the rural character of Leckhampton. This sensitivity is also recognised by the Countryside Agency in its national guidance on AONB's which in considering development control issues concludes that *'Local authority planning policy should not be limited to what is within the AONB boundary. Inappropriate development outside the boundary may have an adverse impact on the landscape within it'*. This concept is supported by the Cheltenham Borough Council through the inclusion of Policy CO 47A within the existing Local Plan which relates to development adjoining the ANOB.

The Cheltenham circular footpath traverses this area linking Leckhampton to Up-Hatherley with some of the best views of the Cotswold Escarpment to the South and East of White Cross. This is a 26 mile route based on the existing rights of way and passing through attractive countryside around the town. It is an important recreational resource which has been the basis for an annual charity event. Whilst it maybe possible to retain the footpath within the proposed development there would be significant adverse impact on the character and amenity of this footpath across this area.

The LEGLAG sustainability work is not yet complete, the transport assessment, air quality and flood risk assessment will be reported when evidence becomes available. In the interim, we would like to make some points for consideration by TBC Planning and REDROW.

1. **LEGLAG considers this application to be premature**, large urban extensions need to be plan led, the Joint Core Strategy needs to have passed Examination in Public (EiP) and have the corresponding Community Infrastructure Levy (CIL) in place to secure school funding and contribute to other infrastructure requirements.

The NPPF Planning Practice Guidance has a useful introduction to infrastructure funding, *'the Community Infrastructure Levy (the levy) is a tool for local authorities in England and Wales to help deliver infrastructure to support the development of the area. Charging schedules should be consistent with, and support the implementation of, up-to-date relevant Plans'*. Permitting this application at this time would adversely affect infrastructure investment. Joint working with CBC is vital in the delivery of this strategic site, having the CIL in place and agreed with the developers is an important part of the process.

The LA analysis and review of both primary and secondary school places to support new development is helpful in the assessment of need, in summary, '25 primary, 18 secondary and 3 sixth form places arise per 100 dwellings', we need to find an additional 92 Primary School and 77 Secondary School places. We would like to work with TBC Planning to identify schools in the area that can provide these additional places and identify the investment required. The schools in the locality are Leckhampton, Warden Hill & Shurdington Primary Schools, Bournside and Balcarras Secondary & Sixth Form Schools and referred to on the [REDROW website in their description of Brizen View development](#) .

On highways infrastructure, Leckhampton is the most car dependent ward in Cheltenham, White Cross will likely be the same being remote from shops, schools and other services. With the estimated additional 220 private vehicles coming onto the network at peak times improved access onto the A46 from Kidnappers Lane would be required if this development were to be approved, this again requires infrastructure funding and joint working with CBC.

2. **LEGLAG considers the REDROW proposal as over development for this site.** There is so little green space provided which impacts on the rural character of the area, the development needs that vital buffer zone along the lines of the original Town & Village Green application requested by residents in 2010 which received maximum scores in all four selection criteria by the county officers. The area of White Cross was considered the BEST candidate for additional greenbelt by AMEC in their JCS greenbelt review covering all three districts of Cheltenham, Tewkesbury & Gloucester.

We believe the area of White Cross should be given greenbelt status as recommended in the JCS AMEC report. If development is forced on the community of Leckhampton please respect the rural character of the area^{[1] & [3]}. It would be poor planning if this much loved green space were to be over developed considering the number of objections TBC have received and given the planning history^[1]. It is important to retain as much green space as possible in any proposals for White Cross. We request consideration of the public view on where green space needs to be retained, centrally located to existing and new development has the advantage of making the proposal more acceptable to existing residents, away from Leckhampton Lane would be safer for children, the balancing pond can be made into a child safe amenity and as previously affirmed to protect the line of the footpath and acting as a wildlife corridor. The importance of buffer zones between existing and new urban extensions [is recognised by the leader of the CBC council, Cllr Steve Jordan in his recent JCS response](#).

In summary, we ask REDROW, the officers and Councillors to please consider the sensitivity of this area and respect the views of residents and add the vital green space needed, a buffer zone between the existing development of the Lanes and any new proposed development, this also protects the amenity of the Cheltenham circular footpath ^[Ref 3 section 4.8, 6.2, 6.3, 6.7] , also attention must be given to avoid the urbanising of Leckhampton Lane. It has been noted that REDROW recognise the importance of the retention of public green space, this is clearly evident in large sites being developed across the county and neighbouring counties, at [Meadowfort Grange, Winchcombe, Sellars Bridge, Hardwicke, Laburnum Gardens, Evesham, Cerney on the Water, South Cerney](#).

3. **LEGLAG and Leckhampton residents are very concerned over the worsening traffic congestion** in the area and Gloucestershire Highways projections^[4] for increased loading on the network without further development. This proposal from REDROW has an access point directly onto Leckhampton Lane so we are very likely to see additional traffic onto Church Road as a direct result of this proposed development, the most sensitive part of the network due to the existing congestion and children using and crossing on their way to/from school. Air Quality is an important issue, the current levels of Nitrogen Dioxide on Church Road break the EU Limits over the winter months and careful judgement needs to be taken on increased traffic congestion, the 'join the queue' attitude would be a poor decision for Children's Health.

It is useful to look back at previous judgements^[6], the Inspector Mr C F Trewick (Appeal Ref: APP/B1605/A/00/1051347, 23rd January 2001) [summed up the situation on Church Road](#), 'My overall conclusion is that conditions are so serious in Church Road, particularly in terms of traffic flow and pedestrian safety, that the further development represented by this proposal must be resisted to prevent a further deterioration of the situation'.

Another appeal which was refused by TBC^[6], *'this road is unsuitable for increased traffic use due to its poor alignment, sub standard junctions with Church Road and Shurdington Road and its restricted carriageway widths, ... this is a direction of the County Surveyor'*.

In a planning application very close to the White Cross fields, Land at Kidnappers Lane, Leckhampton, 13/01605/OUT, Rob Williams of Entran summarised the information provided, *'the traffic modelling that supports the application advises that by 2023 traffic conditions in across Cheltenham resultant of all development proposals will increase;*

- *The number of over capacity queues at junctions increased by 1000% (150 to 1,500)*
- *Total travel time increased by 40%*
- *Total distance travelled increased by 20%.*
- *Transient queues increased by 60%*

Quite simply, the queues will get a lot longer as will journey times. At what point does this stop, it is quite clear from the modelling that a significant number of roads and junctions across Cheltenham will suffer from stifling and unsustainable levels of congestion'.

The Cheltenham Chamber of Commerce reviewed the Bovis/Miller application earlier this year^[5] with concerns over new development to the south of Cheltenham affecting transport.

The transport assessment and highway mitigation work highlights future problems on junction capacity across the area, by 2023 an expected increase of 1000% over capacity junctions, travel times increased by 40%, basically longer and slower traffic queues, this all impacts on local business and affects our ability to attract new business to the town

It is therefore understandable why large scale development to the south of Cheltenham is a real concern to the business community and could adversely affect both existing businesses and future relocations to the town. 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. Keeping a free flow of traffic on the A46 to the south of the town, providing the motorway link from junction 11A, is we believe vital to the wellbeing of commerce. Worryingly the traffic and transport analysis work documented in the transport assessment to date shows that the highways network to the south of the town is finely balanced with junctions likely to be at full capacity in the near term without this additional development.

My wife cycles Church Road most days; she works at Cheltenham General and has noticed the increase in traffic in recent years. This route has become more hazardous and recently she has been knocked from her bike on two occasions, the second needing A&E treatment and time off work. Both accidents were caused by frustrated drivers on a congested narrow road. I mention this only to make one point, asking why she does not cycle down the A46 and Bath Road, she states this is too dangerous; this has implications for the modal shift that is being promoted by both the developers and councils when roads are congested.

In the past Gloucestershire Highways have consistently tried to avoid further congestion on Church Road, we find nothing in the NPPF to contradict that priority, to quote NPPF^[para 32] – *development should be prevented if the residual cumulative impacts of development are severe*, previous judgements from the inspectorate above and those listed in reference 6 clearly demonstrate the current situation on Church Road as severe. We will seek clarification on this point prior to this application going to TBC Planning Committee, however given the current congestion, more traffic onto Church Road is not sustainable and therefore fails the NPPF test of being to the benefit of existing and future generations.

NPPF Ministerial Foreword - *'Sustainable means ensuring that better lives for ourselves don't mean worse lives for future generations'*.

4. **LEGLAG are concerned on the increased potential flood risk to both Warden Hill and Brizen Lane with large scale development on the White Cross fields**, Leckhampton with Warden Hill Parish Council are leading on this assessment. The one point we would like to raise is that the SW of Brizen Lane is subject to historical surface water flooding, this whole area commonly gets saturated in the winter, LEGLAG will survey the residents to assess the extent of this flooding, the frequency of events and request photographic evidence.

LEGLAG will be working on new evidence in the coming weeks and endeavour to bring to the TBC Planning Committee for consideration.

Yours Sincerely,
Ian Bickerton CEng, MIET
Chair LEGLAG

cc
Mr Conor Flanagan, REDROW Consultant (Origin 3)
Gloucestershire Highways, Mr Mark Power and Mr Chris Riley
CBC Planning

TBC Planning Committee Members, Cllr's Ron Allen, Robert Bird, Gillian Blackwell, Derek Davies, Mike Dean, Bob East, John Evetts, Allen Keyte, A Mackinnon, E MacTiernan, Jim Mason, Margaret Ogden.

Mr Martin Horwood MP

Cllr's Steve Jordan, Iain Dobie, Chris Nelson, Andrew Chard

Parish Councils of Shurdington and Leckhampton with Warden Hill

CPRE
Hugh Lufton Planning Consultant
Rob Williams Entran Traffic Consultant

REFERENCES

1. Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013
2. Joint Core Strategy Site Assessment/Capacity Testing, Final Report AMEC Environment & Infrastructure UK Limited October 2012
3. Land at Farm Lane, Church Road, Leckhampton, Cheltenham, Landscape and Visual Appraisal, Final Report, Landscape Design Associates – July 2003
4. Gloucestershire's Local Transport Plan 2011-26 - Promoting a safe and sustainable transport system, April 2011
5. Cheltenham Chamber of Commerce Letter, CE Mr Michael Ratcliffe to CBC Planning Committee addressed to the Chairman Cllr Garth Barnes, dated 31 July 2014 - *Outline Planning Application for up to 650 dwellings, other uses including A1 retail, surgery, pharmacy, primary school of up to 1.72ha land area, principal access and open space - 13/01605/OUT*
6. **Previous Planning Decisions which demonstrate the sensitivity of increasing traffic onto Church Road and Leckhampton Lane, this will be formalised in further correspondence.**

1. Residential development on 2.036ha of land and construction of a new estate road access on land to the east and adjoining St Peter's Church, Leckhampton, 1973, D.O.E. Ref App/1990/A/73/12783/4.

'The proposed development would lead to an increased number of turning movements across Church Road which is a poorly aligned highway, thereby increasing the risk of accidents and creating more hazardous conditions than already exist'.

2. Residential development on 7.19 ha of land N of Kidnappers Lane, 1976, D.O.E Ref App/5228/A/75/9506 Planning Ref T.4188E

'This road is unsuitable for increased traffic use due to its poor alignment, sub-standard junctions with Church Road and Shurdington Road and its restricted carriageway width'.

3. Proposed renewal of storage bay for concrete mixers on land at Leckhampton Dairies by L.D. Transport Ltd. And Leckhampton Dairies, 1987, Planning Ref T.4286/1/1

Decision - Refuse, Borough Planning Officer

4. Application for a Goods Vehicle Operators License, 1994, Ref: OH 152681

'Unit 2 Leckhampton Dairy, Church Road, Leckhampton is authorized as an operating centre for 3 vehicles and no trailers. However, the following environmental condition is placed on the license:- All vehicles on leaving the operating centre shall turn right into Leckhampton Lane in the direction of Shurdington Road and shall return to the operating centre by the same route'.

5. The opening of the Safeway Supermarket caused a large increase in traffic down Church Road, Farm Lane, Kidnappers Lane, contributing to the death of two people travelling from Safeways to Charlton Kings in March 1997.

6. Change of use of land from agricultural to overflow car park; construction of new vehicular access for Sue Ryder home, March 1994, Ref: 93/1701/0027/FUL, Appeal Ref App/5228/A/75/9506

The appeal was dismissed due to damage to the AONB and increased traffic.

7. Traffic Management in the Leckhampton Area, March 1994, Ref: 532/2/130/CE/EH

'... the 94/95 Works Programme included a brief to consultants to assess the impact of the Brockworth Bypass (with its interchange on the A46 S of Shurdington) on traffic patterns in SW Cheltenham. It seems quite likely that the new link to the M5 at junction 11A will attract traffic from the A40 London Road'.

8. Outline planning permission for the erection of two dwellings at Three Springs, Church Road; new joint vehicular access, 1995, 95/1957/0898/OUT

Planning permission for two houses in the grounds of a house in Church Road was refused on the grounds that access was unsafe, this was primarily due to the congestion on Church Road.

9. Conservation Farm for visitors, 1997

Planning permission refused, this was despite local support for a rural activity. The refusal was on the grounds that no further traffic should be encouraged.

10. Proposed development: Erection of 3 Employment Units at Leckhampton Dairies, Church Road, Leckhampton, May 1998, Ref: APP/B1605/A/98/289920

Miss E Hull, B Eng, Msc Eng. C Eng, Senior Development Engineer, Cheltenham Borough Council submitted evidence that *'any additional traffic generated by these units would seriously interfere with highway safety'*. The planning Inspector, in summing up the appeal stated that, *'the emerging County Structure Plan which places even greater needs on meeting the needs of cyclists, pedestrians and those travelling by public transport (Doc 14). In this latter context, the level of traffic in Church Road does not encourage cyclists, and I note that the nearest bus route to the appeal site is along Leckhampton Road, almost 1km away'*.

Also, 'Church Road is generally unsuitable for the traffic which would be generated (by vehicles visiting the Leckhampton Dairies site) and road widening is not a solution since this would destroy the character of this former village'.

11. Gloucestershire County Council appointed Halcrow in January - March 1998 to study ways of alleviating traffic problems between Shurdington and Crippetts cross roads in Leckhampton Lane. Cheltenham Borough Council did their own study at the same time, from Crippetts cross roads to Leckhampton. The report by P. Godwin on these studies presented no solutions.

12. Planning permission for three houses in the grounds of 113 Church Road, 2011.

Refused on the grounds that two additional houses on the site would increase traffic at the most constricted part of Church Road, there was no appeal.