

Leckhampton Green Land Action Group

Cheltenham, Gloucestershire

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Joint Core Strategy Team
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Joint Core Strategy Proposed Main Modifications following Inspector Ord's Preliminary and Interim Reports

Dear JCS Officer Team,

These are the JCS plan amendments which impact directly on Leckhampton and Warden Hill residents and that LEGLAG supports or disagrees:

1. LEGLAG support the REMOVAL of A6 South Cheltenham, Leckhampton (PMM112)
2. LEGLAG support the REMOVAL of A7 South Cheltenham, Up Hatherley (PMM113)
3. LEGLAG support the Parish Council Local Green Space at Leckhampton as set out in EXAM121A, areas HB, CF 1 to 6, R1, LN, LM, KL3, WG1 & LF – see appendix 1
4. LEGLAG support Policy SP2, Urban extensions of Cheltenham provide for the needs of Cheltenham and not Tewkesbury (PMM020)
5. LEGLAG disagree with the removal of the statement of *'proposals that will bring space back into use are encouraged'* (PMM062) This JCS amendment is not consistent with previous policy on town and city regeneration and Government initiatives on the use of previously developed or brownfield land.

A sincere thank you to Inspector Ord, Officer Ian Kemp and the JCS Officers for the delivery of an excellent plan, for the high quality of the evidence at the EiP, and the kind consideration of Leckhampton is very much appreciated.

The residents of Leckhampton and Warden Hill have been devastated by Tewkesbury Borough Council's decision to grant planning permission on Farm Lane after Inspector Ord's Preliminary Report (Dec. 2015) and Cheltenham Borough Council's strong letters of objection. This planning application, given the unsoundness finding from Inspector Ord and the merits of Local Green Space should have remained under the masterplanning of the JCS. Tewkesbury Borough Council and JCS Officers need to understand this is against the first core principle of the NPPF ^[para 17], please see attachments.

'Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out positive vision for the future of the area. Plans should be kept up-to-date and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency'.

Recent members questions to Cheltenham Borough Council (March 2017) and supplementary information provided by the Leader of the Council has revealed the disparity between the agreed S106 monies and the potential Community Infrastructure Levy (CIL) which would have been anticipated at £200/m² for the unallocated Farm Lane site. The Parish C5 group had previously identified a serious shortfall of infrastructure spend within the JCS to 2031. This is another serious disbenefit to the residents of South Cheltenham of granting early planning permission on the Farm Lane site and requires explanation.

The OAHN is high for Cheltenham, at 10,900 it represents a 20% increase in housing across the town. Policy is now vital in the plan to deal with any shortfall in housing delivery in the plan period due to:

- Market forces affecting housing sales with so many sites delivering to the same housing market area;
- Changes to the aspirational economic growth currently set at the annual rate of 4.7%;
- Changes to ONS Population Projections post BREXIT;
- Changes to the DCLG district housing projections and household formation rates as this work transitions to the ONS.

Best Regards

Cllr Ian Bickerton CEng

Chair of LEGLAG or as we prefer Friends of Leckhampton

Cheltenham Borough Councillor for Leckhampton Ward

Parish Councillor, Leckhampton with Warden Hill Parish Council

Chair of Neighbourhood Planning

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Attachments

- 1. Skeleton Arguments on Farm Lane site, Court of Appeal, April 2017**
- 2. Witness Statement on Farm Lane site, Court of Appeal, April 2017**

Appendix 1

Leckhampton with Warden Hill Parish Council Local Green Space Application July 2013 and updated December 2015

We would like to see the Leckhampton Local Green Space at Leckhampton, the GRCC and Inspector Ord have stated that the NPPF criteria for LGS have been met. **The public consultations by the Parish Council and Cheltenham Borough Council demonstrate the strong public support for protection of the much loved green spaces in Leckhampton and easily accessible to the public. If you look at the three maps below, Map 1 is current and being used to support the JCS EiP dated December 2015, Map 2 is a CBC LGS map used in a public consultation in 2016 and Map 3 being used in the recent March 2017 CBC Local plan consultation. Our major concern here is that the boundary of the Leckhampton LGS seems to becoming more vague with time, we request of Inspector Ord and JCS Officers to make a final recommendation on the Leckhampton LGS.**

Inspector Ord has convened five sessions on Leckhampton and made three formal visits to the area including Leckhampton Hill. Additional common ground work was requested from the Parish Council on their NPPF Local Green Space application. With this level of scrutiny at the JCS EiP from Inspector Ord, officers, developers and other organisations, we request the Leckhampton LGS be included in some form in the final strategic plan and this to include the area of White Cross (WCG1) within the control of Tewkesbury Borough Council.

Inspector Ord states in her latest JCS report, *'Turning to the merits of Local Green Space designation at Leckhampton, the proposed LGS lies close to the local community, and is well supported by local people. Following public consultation, a range of reasons was submitted in support of the designation. Amongst other things, these relate to the beauty and interest of views, the importance of the network of footpaths for dog walkers and others, opportunities for all year round exercise such as jogging, enjoyment of the historic buildings, hedgerows and trees, and the area's overall tranquility. In my judgement, the evidence suggests that the NPPF criteria are met and LGS designation is justified. Detailed boundaries are best left for either the Cheltenham Borough Plan or the forthcoming Neighbourhood Plan.*

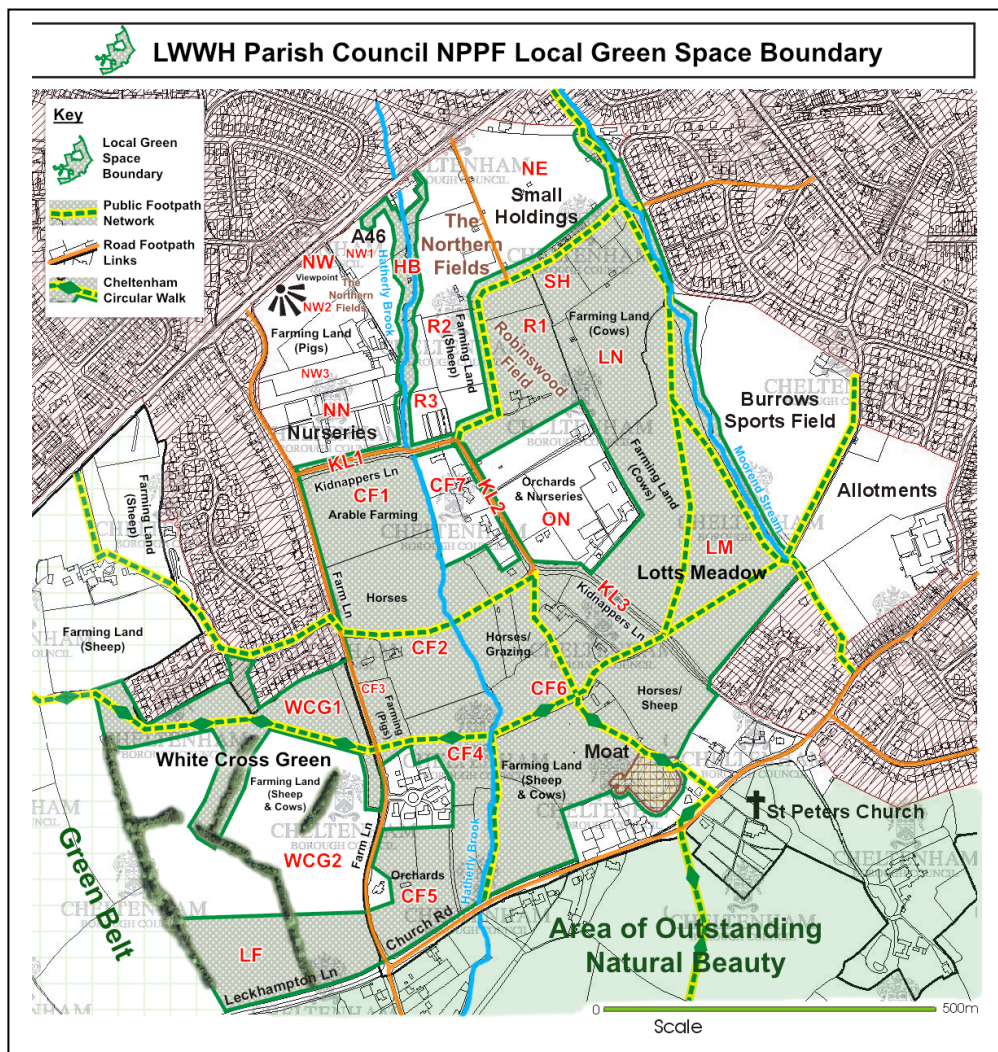
These are the JCS Natural Environment and Broad Locations series reports and relevant sections to Leckhampton

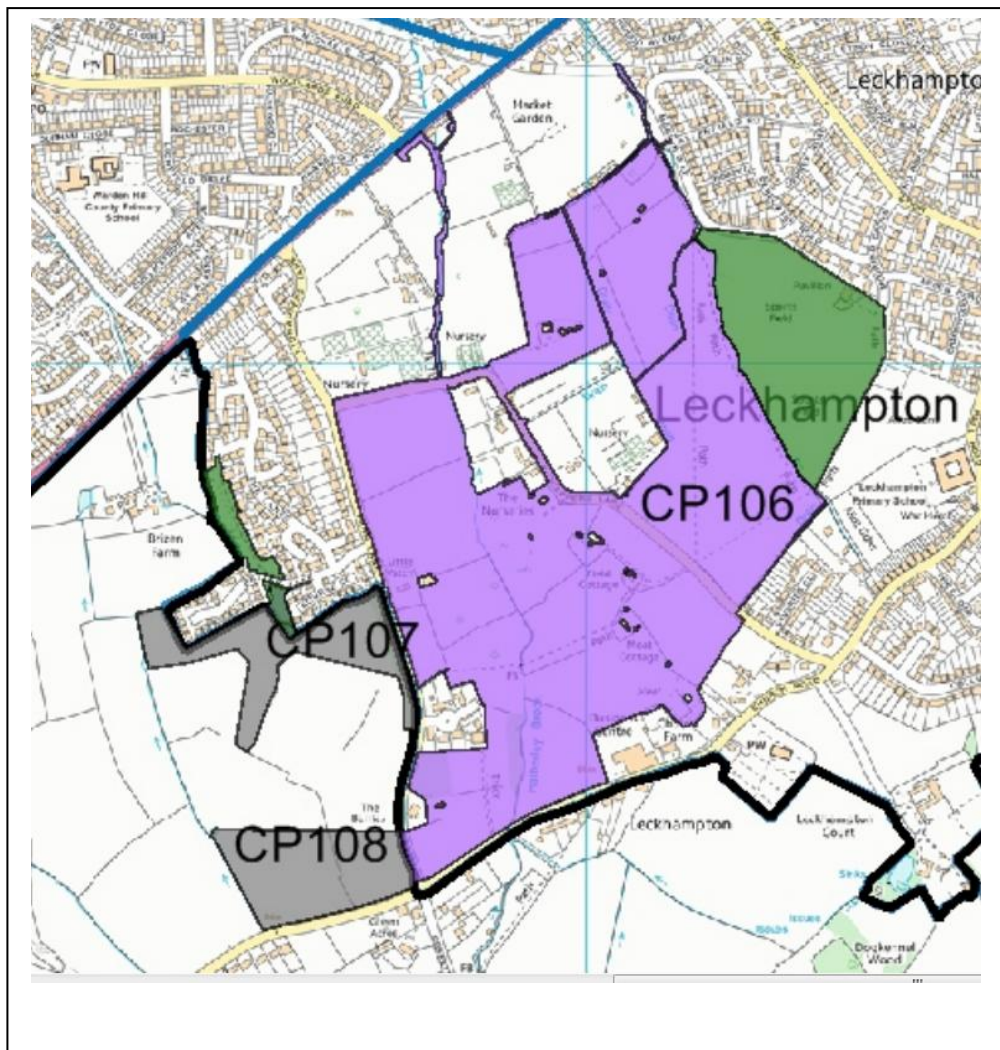
- EBLO 106 JCS Landscape and Visual Sensitivity (Oct 2012), section 6, p14-17, extract [E1];
- ENAT 100 JCS Greenbelt Assessment (Final, Sept. 2011), sections (5.2.6), (5.4.5) and (7.3.8), and
- E104 JCS Halcrow Strategic Flood Risk Assessment level 2, (Final July 2012), reference site T10 (SD2), section 7

Leckhampton with Warden Hill Parish Council and Neighbourhood Planning Team submitted the first Neighbourhood Planning Document in July 2013, **JCS EXAM 18 B1 Leckhampton with Warden Hill Parish Council Neighbourhood Planning NPPF Concept Plan & Local Green Space Application July 2013 75pp - [Published here](#)**

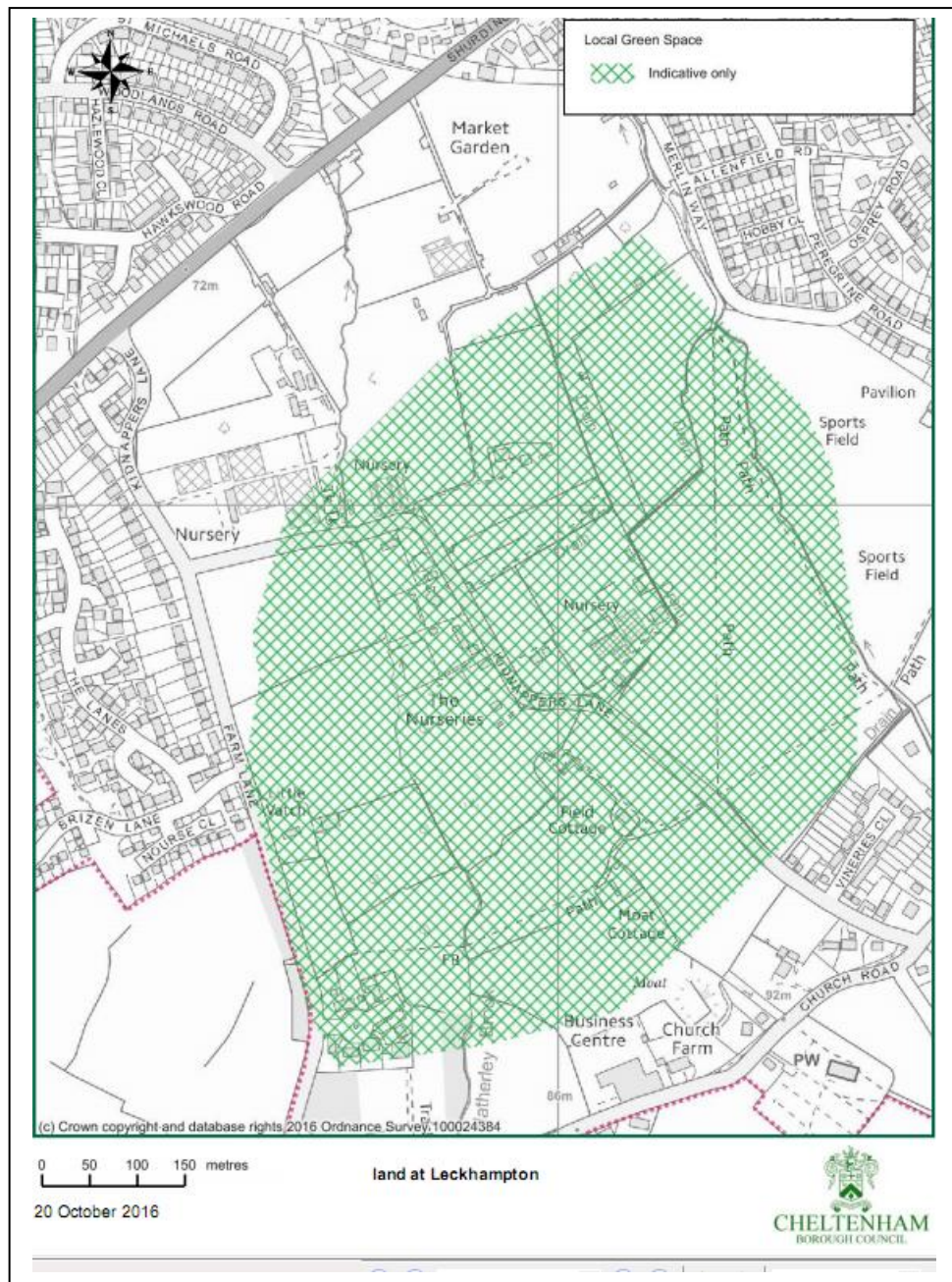
The NPPF Local Green Space application was revised in December 2015, this was a result of common ground work instigated by Inspector Ord at the Joint Core Strategy Examination in Public Sessions and Council Officers ^[JCS EXAM 18A1, 18C1, 18D1, 121, 121A, 121B, 121C].

Leckhampton with Warden Hill Parish Council Neighbourhood Planning Revised Local Green Space Application - Dec 2015 [Leckhampton Fields LGS application minus Appendices 4-11.pdf](#)





Map 2 CBC Local Plan Consultation – Preferred Options, Leckhampton Local Green Space



Map 3 CBC Local Plan Consultation – Preferred Options Leckhampton Local Green Space, request CBC to revert to the LWWHPC LGS Map 1 used at the JCS EiP.