

## LECKHAMPTON WITH WARDEN HILL PARISH COUNCIL

# THE JOINT CORE STRATEGY IS FAILING CHELTENHAM PLEASE READ THIS BRIEF AND HAVE YOUR SAY

**CONSULTATION CLOSES 17:00 11<sup>th</sup> AUGUST – POST YOUR REPLY BY 8<sup>th</sup> AUGUST**

After five years of preparation by the three councils of Cheltenham, Gloucester and Tewkesbury, the strategy for the local area, known as the Joint Core Strategy (JCS), is about to be submitted to the Planning Inspectorate. Local residents are again being asked for their views. You may have responded to the earlier JCS consultations, but it is the only responses to this final consultation that the Inspector will consider. It is therefore very important that as many residents as possible respond; otherwise the Inspector may assume that everyone is happy with what is being proposed.

**Breaking the local traffic system:** For residents in south Cheltenham, the biggest concern is that the Leckhampton Fields are still included as a strategic development site for 1124 homes. The extra traffic from this development, together with traffic from the 1500 new homes that the JCS is proposing at Brockworth, will cause the morning A46 traffic queue to reach down to the A417 or beyond. Church Road, which currently handles 1300 cars in the peak morning period, will become an A46 by-pass and will be choked with heavy traffic. The difficulty of commuting into Cheltenham will damage the local economy. The traffic problems will spread from the Moorend Park Road junction to other areas including The Park, Moorend Road and Bath Road. To avoid the A46 queue, traffic may also divert by Leckhampton Hill and along Leckhampton Road and Old Bath Road.

**Destruction of local beauty and amenities:** In 1993, the planning inspector concluded that the Leckhampton Fields should be protected from development *'because of its varied topography, landscape history, dense network of footpaths, and pedestrian access from several residential districts,'* and that *'it would be very sad indeed if development were to proceed at Leckhampton.'* A study commissioned by Cheltenham Borough Council in 2003 reached the same conclusion. In August 2013, Leckhampton with Warden Hill and Shurdington parish councils jointly submitted a Local Green Space (LGS) application to protect the Leckhampton Fields from inappropriate development. This LGS application was wrongly ignored by the JCS team.

**Inflated housing need:** The National Planning Policy Framework (NPPF) says the JCS must be based on objectively assessed housing need. The JCS is overestimating the housing need: 30,500 compared with 23,500 from projections by the Office of National Statistics (ONS). For Cheltenham, the JCS predicts an average population growth of 860 per year and the ONS predicts 780 per year, but the actual growth from 2011 to 2013 has been only about 250. The JCS also inflates the housing need because it believes household size will fall. Average UK household size did fall between 1911 and 1991 because of smaller families and greater affluence. But since 1991 it has been constant. The JCS assumes it will start falling again, but there is no evidence to support this.

**Lack of infrastructure and schools:** The JCS involves a very high infrastructure cost. This will squeeze any money available for affordable housing and other investments. It is also still unclear how enough secondary schooling can be provided for families in south Cheltenham.

**Please send your response to: JCS Team, Municipal Offices, Cheltenham, GL50 9SA  
or scan your response and email it to: [info@gct-jcs.org](mailto:info@gct-jcs.org)**

## HOW TO RESPOND

The page opposite has a number of statements in the form required for submission to the Planning Inspectorate. **Please delete any parts you do not want to support and be sure to include your name, address and postcode** as your response will not otherwise be accepted. The form is printed twice so that up to two people can reply from each address.

**You can add further comments on the back of the form if you wish** but these must be related to ways that the JCS is not LEGALLY COMPLIANT and/or is UNSOUND. The legal phraseology from the JCS team is that In order to be found 'sound' by an independent inspector the JCS must be:

- **Positively prepared** – *the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*
- **Justified** – *the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*
- **Effective** – *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;*
- **Consistent with national policy** – *the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.*

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To: JCS Team, Municipal Offices, Cheltenham, GL50 9SA

Name:.....

Address: .....Postcode.....

I believe that the JCS is NOT LEGALLY COMPLIANT AND NOT SOUND for the following reasons:

1. The Pre-submission Draft is not positively prepared or justified and is inconsistent with national policy because the proposed strategic development at Leckhampton undermines the current traffic system and fails to provide a sustainable transport infrastructure, contrary to section 4 of the NPPF. It also fails to address clearly the provision of secondary education in accordance with paragraph 72 of the NPPF.
2. It is not legally compliant and is not consistent with national policy. It fails to take account of the Local Green Space application and the evidence on traffic problems in the Neighbourhood Planning Concept submitted by Leckhampton with Warden Hill and Shurdington Parish Councils relating to the Leckhampton Fields. The evidence was set aside without informing the parish councils. This is contrary to Community Empowerment and Neighbourhood Planning and undermines public trust in government.
3. It is not positively prepared. The housing need is not objectively determined. It uses population projections higher than those from the 2011 census and the Office of National Statistics. It is based on assuming a future fall in household size that is speculative and unsupported by historical evidence or observable social and household trends. This is contrary to section 14 of the NPPF.
4. It is not justified and is inconsistent with national policy because it fails to give appropriate protection to the Leckhampton Fields in accordance with section 8 paragraph 77 of the NPPF and NPPF sections 11 and 12, taking into account the recommendations from previous planning inspection and landscape consultant studies on the special community, historical and landscape value of the Leckhampton Fields and their relationship to the Cotswold Area of Outstanding Natural Beauty.

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