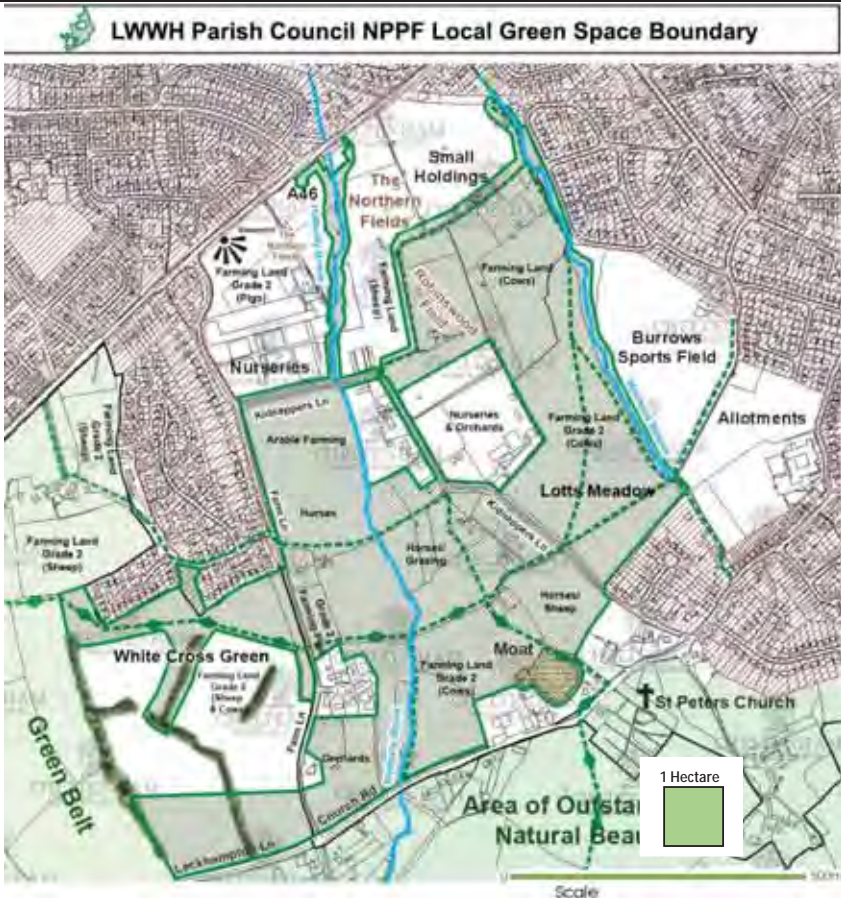


## 1. Local Green Space toolkit checklist –Leckhampton Fields

1	General Information	Tick rele evic pro
1.1	Name and address of site <i>Some sites have several names and all known names should be given</i>	
	<p>Leckhampton Fields</p> <p>The site is located in Leckhampton between the A46 (Shurdington Road) in the northwest and Church Road / Leckhampton Lane in the southeast. The field area is bounded as follows: On the northwest side by the A46 (Shurdington Road), on the north by the course of the old railway line, on the east side by Moorend Stream and the south-east boundary of Lotts Meadow. On the south side by the boundaries of properties along the north side of Church Road and Leckhampton Lane. On the west side by the west boundary of White Cross Green fields, the southern boundary of the Lanes Estate and along Farm Lane and Kidnappers Lane to the A46.</p> <p>Some areas have well known names, for example Lotts Meadow, Robinswood and White Cross. The Leckhampton fields is a generic name for the area with the high density of footpaths shown in Section 1.2 below.</p>	
1.2	Site location plan <i>The plan can be at any scale, but must show the location and boundaries of the site. Please indicate the scale.</i>	
	 <p>The map, titled 'LWWH Parish Council NPPF Local Green Space Boundary', shows the Leckhampton Fields area. It is bounded to the northwest by the A46 (Shurdington Road), to the north by the old railway line, to the east by Moorend Stream and the south-east boundary of Lotts Meadow, to the south by Church Road and Leckhampton Lane, and to the west by the boundaries of White Cross Green fields, the southern boundary of the Lanes Estate, and along Farm Lane and Kidnappers Lane to the A46. The map includes various labels for land use and features, such as 'Farming Land (Grade 2) (Plg)', 'Nurseries', 'Arable Farming', 'Nurseries &amp; Crochets', 'Farming Land (Grade 2) (Cows)', 'Burrows Sports Field', 'Allotments', 'Lotts Meadow', 'White Cross Green', 'Green Belt', 'St Peters Church', and 'Area of Outstanding Natural Beauty'. A scale bar at the bottom right indicates 1 Hectare.</p>	



	<p>The LGS map of Figure 1 of the IACS (Section 1.2) shows the footpath access points to all the main urban areas, please note the new proposed footpath/link to Woodlands Road.</p> <p>See also section 3.2</p>	
2	<b>Planning History</b>	
2.1	<p>Is there currently a planning application for this site? If permitted, could part of the overall site still be used as a Green Open Space? for further information please contact Cheltenham Borough Council <a href="#">Planning Applications</a> team</p>	
	<p>There is one planning application from REDROW, reference 14/00838/FUL, with TBC for consideration.</p> <p>An application from Bovis and Miller Homes was refused by CBC in July 2014.  <a href="#">CBC Extraordinary Planning Committee - Leckhampton 31st July</a>,  Cllr Garth Barnes: <i>the refusal reasons are therefore:</i></p> <ul style="list-style-type: none"> <li>- CP1, CP3, CP4 and CP7</li> <li>- prematurity regarding the JCS and LGS application</li> <li>- TP1</li> <li>- NPPF Paragraphs 32, 105 and 109</li> <li>- all policies mentioned by Lufton Associates in Paragraph 5 of their letter to Committee [NPPF Paragraphs 109 and 115, Local Policies CO1 and CO2, and Policies SD7 and SD8 of the emerging JCS]</li> </ul> <p><i>This is a very comprehensive list.</i></p> <p>Here is the link to <a href="#">Mr Mike Redman's (Director - Built Environment) report, the grounds for refusal - 13/01605/OUT</a>.</p> <p>The CBC full council, on the 28<sup>th</sup> February 2014, voting unanimously to remove Leckhampton from the Joint Core Strategy, reference Cheltenham Borough Council, full council , <a href="#">link to minutes</a>.</p> <p><i>This Council directs that the JCS Team reconsider the status of Leckhampton and Up Hatherley as strategic sites within the JCS and explores the possibility of withdrawing these locations from the Strategy and report back to Council in April.</i></p> <p><b>Voting For 23:</b> Councillors Bickerton, Britter, Chard, Flynn, Godwin, Hall, R Hay, C Hay, Jordan, Massey, McCloskey, McKinlay, Rawson, Regan, Reid, Seacome, Smith, Stewart, Sudbury, Thornton, Walklett, Wheeler, Whyborn, <b>Against 0 No Abstentions</b></p>	
2.2	<p>Is the site allocated for development in the existing Development Plan, emerging Joint Core Strategy, Cheltenham Plan or a Neighbourhood Plan? If allocated, could part of the overall site still be used as a Green Open Space? For further information please contact Cheltenham Borough Council <a href="#">Planning Policy</a> team</p>	
	<p>Some of the area has been marked as a strategic site in the JCS, the site sustainability has been questioned by Cheltenham Borough Planning Committee in their assessment of the Bovis and Miller Homes application which was refused in July 2014.</p> <p>It is possible that the Inspector at EiP will call for changes in the plan, the housing numbers and sites for Cheltenham have been challenged by the C5 Parish Councils and other organisations. It is hoped</p>	

	<p>that the NPPF LGS application for Leckhampton will be considered on merit and the evidence presented, as the original LGS application of August 2013 predates the JCS submission.</p> <p>At the time the Parish Council LGS application was submitted in August 2013, there was no planning application for development on any of the land. The land was <u>under consideration</u> for inclusion in the Joint Core Strategy as a strategic development site. The land in Cheltenham Borough is not allocated for development in the current Cheltenham Plan. Part of the land in Shurdington Borough is identified in the Tewkesbury Plan as being potentially suitable for development subject to the development being sustainable. An application to build on the land was rejected at appeal by the planning inspectorate in 2009 on grounds that development on the site was not sustainable because it would be isolated from the urban area; this was also the view of the Government Office South West.</p>													
3	Size, scale and “local nature” of proposed Local Green Space													
3.1	Area of proposed site													
	<p>The area of the LGS is defined on the Map given in Figure 1 of the IACS – see Section 1.2.</p> <p>The LGS Boundary has been downsized and re-appraised to identify where development at a level appropriate to a strategic site might cause the least harm to the landscape and amenity value. The findings from this re-appraisal are set out in Appendix 1, the map of figure 1 has a marked scale and the key shows 1 hectare for reference.</p> <p>Approximate Leckhampton LGS Areas, totalling 43 Hectares:</p> <table><tr><td>Lotts Meadow</td><td>10Ha</td></tr><tr><td>Robinswood Fields</td><td>7 Ha</td></tr><tr><td>Central Fields</td><td>18 Ha</td></tr><tr><td>White Cross</td><td>4 Ha</td></tr><tr><td>AONB Buffer</td><td>4 Ha</td></tr><tr><td colspan="2">(south of White Cross)</td></tr></table>	Lotts Meadow	10Ha	Robinswood Fields	7 Ha	Central Fields	18 Ha	White Cross	4 Ha	AONB Buffer	4 Ha	(south of White Cross)		
Lotts Meadow	10Ha													
Robinswood Fields	7 Ha													
Central Fields	18 Ha													
White Cross	4 Ha													
AONB Buffer	4 Ha													
(south of White Cross)														
3.2	<p>Is the site an “extensive tract of land”?</p> <p><i>(Extensive tracts of land cannot be designated as Local Green Space)</i></p> <p><i>e.g. how large is it in comparison to other fields; groups of fields; areas of land in the vicinity etc.? Does the site “feel” extensive or more local in scale?</i></p>													
	<p>Cheltenham’s MP, Martin Horwood, has provided some important guidance to the council on what the NPPF defines as an ‘<i>extensive tract of land</i>’ (para 77), the ministerial view is that the LGS fall into the same category as those designated as Sites of Special Scientific Interest, the example being given of Charlton Kings Common.</p> <p>There are 143 SSSI’s in Gloucestershire and that two of the nearest are (1) Leckhampton Hill &amp; Charlton Kings Common and (2) Crickley Hill &amp; Barrow Wake which cover 63ha and 55ha respectively.</p> <p>This area of land is local to the village of Leckhampton, the first settlement in this area of Gloucestershire and has been protected for many generations. Importantly this area is very accessible and close to the urban areas that it serves. The LGS is local to Leckhampton but enjoyed by residents of other wards in the town, there is no other area in Cheltenham that provided the same density of footpaths with such an attractive rural character<sup>[1 &amp; 2]</sup> and tranquillity.</p>													



	<p>The site serves the Cheltenham community on all four sides, please see the map of figure 1. To the northwest it serves residents in Warden Hill, with the existing footpath and the new proposed link to Woodlands Road and along the Shurdington Road. They mainly use the access track from the A46 to the Leckhampton Fields Circular Path and thence to Robinswood Field or to Lotts Meadow, or round the Circular Walk.</p> <p>To the north and north-east it serves residents in Leckhampton who access the land either by the footpath from the A46 along Moorend Stream, or from several roads adjacent to Moorend Stream, or from Burrows Field, which has the car park that is used by people coming from further afield.</p> <p>From the east it serves residents in Leckhampton Village and to the east of that along Leckhampton Road, Pilley and Old Bath Road, who access the site via the footpath from Church Road along Moorend Stream, via Kidnappers Lane, via th footpath (Cheltenham Circular Path) from St Peters Church carpark past the Medieval moat,</p> <p>To the south, it serves residents along Church Road and Leckhampton Lane and to the west it serves residents along Farm Lane and the north end of Kidnappers Lane and residents in the Lanes Estate. The network of footpaths on the land also connects to footpaths up Leckhampton Hill.</p> <p>The National Planning Policy Framework para 52 is helpful in providing guidance on potential urban extensions. <i>'The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development.'</i></p> <p>The Leckhampton LGS application provides just such an opportunity, and is very well supported by the community.</p>
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## References

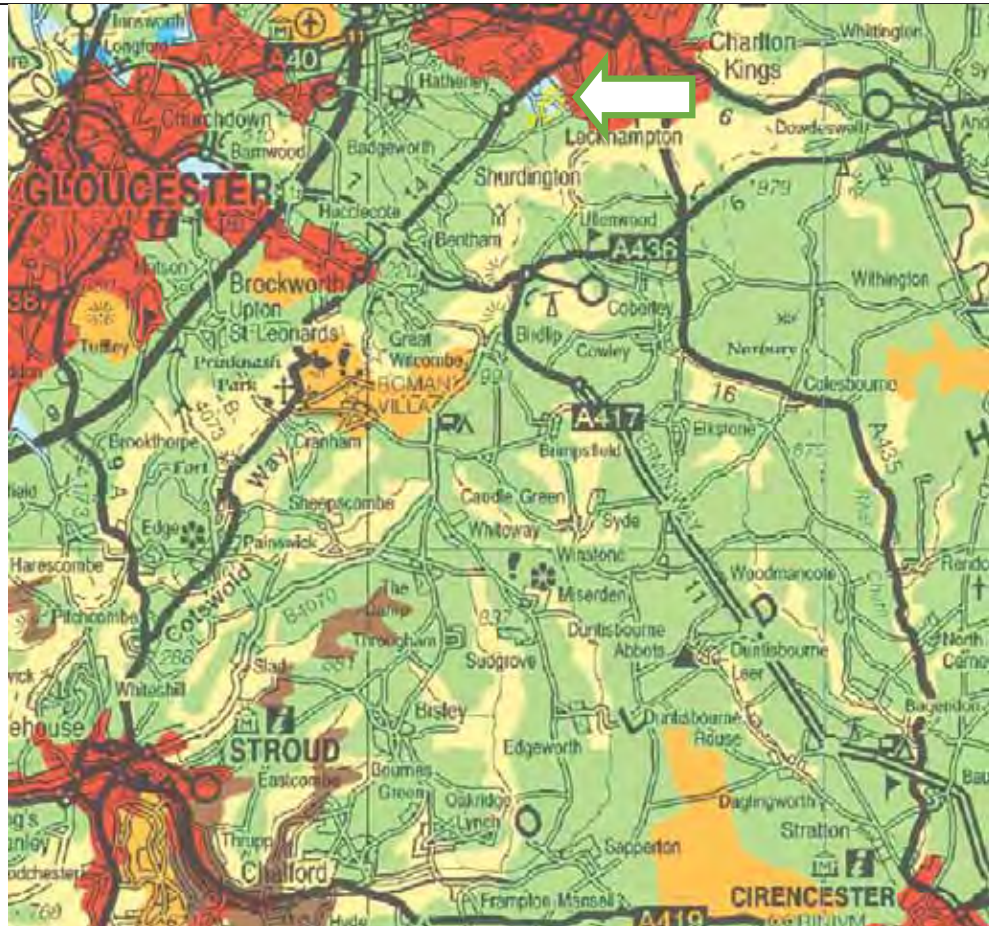
1. Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013, [available on this link](#)
2. Land at Farm Lane, Church Road, Leckhampton, Cheltenham, Landscape and Visual Appraisal, Final Report, Landscape Design Associates – July 2003, [here](#)
3. Joint Core Strategy Site Assessment/Capacity Testing, Final Report AMEC Environment & Infrastructure UK Limited October 2012

## Sections below

### Maps

[Figure 2 Leckhampton Ecology Map, Extract from Leckhampton with Warden Hill \(LWWH\) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013](#)

[Figure 3 Halcrow JCS Flood Risk Assessment – Leckhampton](#)



The LGS boundary is outlined above in yellow on the DEFRA South West Region 1:250000 Series Agricultural Land Classification map, the LGS is local the village of Leckhampton but serves the whole town being so well connected to the urban area. This map also shows the rarity of high quality agricultural land in Gloucestershire, perhaps this explains why this area has been protected for over 30 generations, **please consider the synergy between this LGS application, future food production and the proximity to the UoG Park Campus for agricultural research.**

3.3	<p>Is the proposed site “local in character”?</p> <p><i>e.g. does the site feel as though it is part of the local area? And why? How does it connect physically, visually and socially to the local area? What is your evidence?</i></p>
	<p>It is part of Leckhampton Village with a rich history, please see reference 1 and 2 for detailed evidence plus section 3.2</p> <p>The fields have great charm and beauty with many fine views, reference 2 provides a detailed landscape and visual appraisal by Landscape Design Associates commissioned by Cheltenham Borough Council. They are integral to the character of Leckhampton and to what makes South Cheltenham an asset to the town and a wonderful location for a country park. Question 4 in the public consultation questionnaire at appendix 2 list many of the noteworthy features.</p> <p>Please access reference 1, Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013 for information on:</p>

Figure 4 DEFRA Agricultural Land Classification, DEFRA website – Leckhampton

	<p>Foreword<sup>[1]</sup>, Executive Summary<sup>[1]</sup> and section 2<sup>[1]</sup>- Some of the important background on Leckhampton, planning and the LGS application.</p> <p><b>Please access reference 1 for the following information on the LGS application:</b></p> <p>3 LOCAL GREEN SPACE APPLICATION..... 14</p> <p>3.1 The History of Leckhampton..... 17</p> <p>3.1.1 The Fields Beneath ..... 20</p> <p>3.2 Leckhampton Ecology, Wildlife &amp; Habitat ..... 24</p> <p>3.3 The Natural Environment White Paper &amp; the State of Nature ..... 27</p> <p>3.4 Material Reasons for Avoiding Large Scale Development in Leckhampton ..... 30</p> <p>3.4.1 Traffic Congestion &amp; Poor Air Quality on the Shurdington &amp; Church Roads..... 31</p> <p>3.4.2 Flood Risk to Warden Hill &amp; the Leckhampton Lanes ..... 33</p> <p>3.4.3 Landscape and Visual Impact of Large Scale Development in Leckhampton &amp; Shurdington .. 34</p> <p>3.4.4 Previous Inspectors Reports &amp; Enquiries ..... 36</p> <p>3.5 What a Leckhampton Local Green Space means to the Community and Town..... 38</p> <p>3.5.1 Leckhampton is so well connected to the Urban Area ..... 40</p> <p>3.5.2 The Natural Choice ..... 41</p> <p>References</p> <p>.....</p> <p>Photographs of various parts of the site and from the Leckhampton Circular Walks are attached at appendix 5, the landscape appraisal <sup>[2]</sup> and photographic links to the area <sup>[1 Map of Appendix 1, yellow boxes are links to photographs]</sup>.</p> <p>The fields also have great landscape importance to the nationally famous views from Leckhampton Hill and also from Charlton King Common. Leckhampton Hill is one of the great assets of Cheltenham, which along with the architecture and the many trees adds much to Cheltenham's reputation and quality of life.</p> <p>The area has been inhabited since Roman times and probably earlier, Crickley Hill to the south being inhabited as far back as 5000 BC. Leckhampton Court and St Peter's Church are early 14<sup>th</sup> century although part of the Church is much older. The Moat belonged to a second Medieval manor, now lost. On the fields northwest of the Moat there are three cottages that were part of old Leckhampton. Further information on the history is contained in the August 2013 LGS application (Reference 1). This also contains details about the ecology, wildlife and habitats in the fields.</p>	
4	<b>Need for Local Green Space</b>	
4.1	<p>Is there a need for a local green space in this location?</p> <p><i>e.g. is there a shortage of accessible greenspace in the area? Is there a village needs survey or parish plan that provides evidence of that need.</i></p> <p><i>Further information – Natural England (<a href="#">Accessible Natural Greenspace Standard</a>)</i></p>	
	<p>There is a shortage of public open space, amenity, and children's play space serving Farm Lane, the Lanes, Nourse Close and Brizen Lane. The existing development fails the 6 acres per thousand residents planning guidelines, the area of White Cross is requested as open public space, see LGS map, it also serves the main Leckhampton and Cheltenham circular footpath.</p> <p>Reference 1 gives our view and the evidence why access to natural open space is so important to the community<sup>[1 section 3.5.2 The Natural choice]</sup></p>	
5	<b>Evidence to show that "the green space is in reasonably close proximity to the community it serves"</b>	

	<b><i>Please indicate what evidence you have provided against each point.</i></b>	
5.1	How far is the site from the community it serves? Is the site within 2km of the local community? <i>Possible evidence – a map to show that distance</i>	
	Please refer to the scaled LGS map of figure 1 in Q1.2 above and from IACS, reference [1] section 3.5.1 <i>'Leckhampton is so well connected to the Urban Area'</i>  Please also see Q3.2 above.	
5.2	Are there any barriers to the local community accessing the site from their homes? <i>e.g. railway line; main road</i> <i>Possible evidence – a map to show any potential barriers and how those can be overcome.</i>	
	The proposed LGS is well served by a high density of public footpaths (please refer to the LGS map <sup>[figure 1 in the IACS]</sup> in Q1.2 above) and access it provided from all adjoining urban areas.	
<b>6</b>	<b>Evidence to show that the green area is “demonstrably special to a local community”</b> <b><i>Please indicate what evidence you have provided against each point.</i></b>	
6.1	Evidence of support from Parish or Town Council <i>e.g. letter of support; Council minutes</i>	
	Reference Appendix 2 and section 2.1.	
6.2	Evidence of support from other local community groups or individuals. <i>e.g. letters of support; petitions; surveys etc.</i>	
	Appendix 2: Petitions completed regarding the importance of Leckhampton Fields to local people in 2011, with over 2000 signatures, and in 2013, with 1000 signatures  A public consultation survey was completed in January 2015, to support this application and demonstrate how the Leckhampton Fields are important to local people. A total of 774 completed forms of support for the LGS application were returned and are made available to the council, 1491 town residents (approximately 1350 adults and 140 children), please see section 7.2 and appendix 3 for the initial analysis.  The LGS public meeting held at Leckhampton Primary School on the 14 <sup>th</sup> January 2015 was very well attended with an estimated 200 people packing the hall, local borough and county councillors and our MP gave their views.	
6.3	Evidence of support from community leaders <i>e.g. letters of support from Ward Members; County Councillors; MP etc.</i> <i>Further information on these contact details – <a href="#">Cheltenham Borough Council</a>, <a href="#">Gloucestershire County Council</a>, <a href="#">House of Commons</a></i>	
	Requests for support have been made and will be provided separately.  Letters from: MP Martin Horwood – Appendix 11, County Councillor Ian Dobie (Appendix 2)	



6.4	Evidence of support from other groups <i>e.g. letters of support from organisations such as Campaign to Protect Rural England; local amenity societies; local schools etc.</i>	
	Requests for support have been made and will be provided separately. Letter from chair of Leckhampton Local History Society Eric Miller – Appendix 2	
7	<b>Evidence to show that the green area “holds a particular local significance, for example because of its beauty,” (if applicable)</b> <b><i>Please indicate what evidence you have provided against each point.</i></b>	
7.1	Is this criteria relevant to this site ?	
	YES evidence is provided <sup>[1 &amp; 2]</sup>	
7.2	Describe why the community feels that the site has a particular local significance for its beauty.	
	<p>The public petitions submitted to protect the land have over 2000 signatories in one case and over 1000 in the other, and these were only partial consultations. So there is no doubt that local people believe the land is very special. It has great charm and beauty with many fine views. The appendices 5 to 9 show photographic evidence of this and of the walks and field that people use.</p> <p>Reference 2 provides a detailed landscape and visual appraisal by Landscape Design Associates commissioned by Cheltenham Borough Council. They are integral to the character of Leckhampton and to what makes South Cheltenham an asset to the town and a wonderful location for a country park.</p> <p>The fields also have great landscape importance to the nationally famous views from Leckhampton Hill and also from Charlton King Common. Leckhampton Hill is one of the great assets of Cheltenham, which along with the architecture and the many trees adds much to Cheltenham's reputation and quality of life. Evidence from the photographic assessment of the impact of development on the view from Leckhampton Hill and from the Cotswold Way National Trail is attached at appendix 4.</p> <p>Question 4 in the public consultation questionnaire at Appendix 3 list many of the noteworthy features and 89% of respondents valued Leckhampton Fields for the views of Leckhampton Hill and 84% valued the views across the fields, 1491 people participated in this survey in January 2015, a very high percentage of residents given the short 10 day consultation period.</p> <p>Information is provided in Reference 1- 'Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013 – Section 3.4.3 – Landscape and visual impact of large scale development in Leckhampton and Shurdington.</p>	
7.3	Site visibility <i>e.g. is it easy to see the site from a public place? Are there long-distance views of the site? Are there views of the site from any key locations?</i>	
	Please reference the Land at Farm Lane, Church Road, Leckhampton, Cheltenham, Landscape and Visual Appraisal, Final Report, Landscape Design Associates – July 2003 (Reference 2)	

	Joint Core Strategy Site Assessment/Capacity Testing, Final Report AMEC Environment & Infrastructure UK Limited October 2012 (Reference 3)	
7.4	Is the site covered by any landscape or similar designations? <i>e.g. Area of Outstanding Natural Beauty; Conservation Area; Special Landscape Area</i> <i>Further information – <a href="#">Cheltenham Borough Council</a>; <a href="#">Natural England</a>;</i>	
	The LGS borders the Greenbelt to the south west and the AONB to the south.	
7.5	Is the site (or the type of site) specifically mentioned in any relevant landscape character assessments or similar documents? <i>e.g. Cotswolds AONB landscape character assessment. Further information – <a href="#">Cheltenham Borough Council</a>; <a href="#">Natural England</a>; <a href="#">Cotswolds Conservation Board</a></i>	
	Yes See reference 2 - Land at Farm Lane, Church Road, Leckhampton, Cheltenham, Landscape and Visual Appraisal, Final Report, Landscape Design Associates – July 2003  See Reference 1 - Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013 – Section 3.4.4 - Previous Inspectors Reports & Enquiries	
7.6	Does the site contribute to the setting of a historic building or other special feature?	
	Yes- See reference - Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013 – Section 3.1	
7.7	Is the site highlighted in literature or art? <i>e.g. is the site mentioned in a well-known poem or shown in a famous painting?</i>	
	There is a reference to the poet James Elroy Flecker in the History of Cheltenham, he refers to the beauty of the ' <i>Leckhampton Lanes</i> ' in one of his poems, and in ' <i>November Eves</i> ' makes mention of Leckhampton Hill.	
8	Evidence to show that the green area "holds a particular local significance for example because of its <u>historic significance</u> " (if applicable) <i>Please indicate what evidence you have provided against each point.</i>	
8.1	Is this criteria relevant to this site ?	
	YES - See Reference 1 - Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013 – Section 3.1	
8.2	Are there any historic buildings or remains on the site? <i>e.g. listed buildings; scheduled ancient monuments ; registered parks and gardens; war memorials; other historic remains or structures.</i> <i>Further information – <a href="#">Cheltenham Borough Council</a>; <a href="#">English Heritage</a>; <a href="#">Gloucestershire Historic Environment Record</a>; <a href="#">Gloucestershire Archives</a>; local history society;</i>	
	There is one ancient monument – the moat of a medieval manor. There are three cottages within the LGS that are listed buildings. The oldest is Moat Cottage which dates from the 16 <sup>th</sup> century. This is	

Figure 5 MAFF Agricultural Land Classification – Leckhampton

	<p>pictured on the front cover of Reference 1- Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013.</p> <p>Along the Leckhampton Fields Circular Walk are Leckhampton Manor and St Peter's Church, both of which date from about 1315, although St Peters has some Saxon footings having been built on the site of an earlier church.</p> <p>In the January 2015 survey of Leckhampton Fields, completed by 1491 people (Appendix 3), 34% of respondents valued the mediaeval moat and 39% the mediaeval cottages in Leckhampton Fields.</p>	
8.3	<p>Are there any important historic landscape features on the site?  <i>e.g. old hedgerows; ancient trees; historic ponds or historic garden features</i>  <i>Further information – Cheltenham Borough Council; <a href="#">English Heritage</a>; <a href="#">Gloucestershire Historic Environment Record</a>; local history society</i></p>	
	<p>There are many ancient hedgerows and trees within the site          See Reference 1 - Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013 – Section 3.1 The History of Leckhampton, 3.1.1 The Fields beneath and 3.2 Leckhampton Ecology, Wildlife and Habitat.</p> <p>See also Reference 2 Land at Farm Lane, Church Road, Leckhampton, Cheltenham, Landscape and Visual Appraisal, Final Report, Landscape Design Associates – July 2003</p>	
8.4	<p>Did the site play an important role in the historic development of the village or town?  <i>e.g. the old site of the town railway station; the old garden for the manor house etc.</i></p>	
	<p>Leckhampton Village and Leckhampton Court predates Cheltenham and was one of the first settlements in this area, this is due to the fertility of the soil, drought resistance and water supply from Leckhampton Hill, please reference figures 3, 4 and 5 - IACS Maps below.</p>	
8.5	<p>Did any important historic events take place on the site?</p>	
	<p>Not Known</p>	
8.6	<p>Do any historic rituals take place on the site?  <i>e.g. well-dressing; maypole dancing etc.</i></p>	
	<p>Not Known.</p>	
9	<p>Evidence to show that the green area "holds a particular local significance, for example because of its <u>recreational value</u> (including as a playing field)", (if applicable)  <i>Please indicate what evidence you have provided against each point.</i></p>	
9.1	<p>Is this criteria relevant to this site ?</p>	
	<p>YES</p>	
9.2	<p>Is the site used for playing sport?  <i>If so what sport? How long has it been used for sports provision? Is this sports provision free or is a club membership required?</i>  <i>Further information – <a href="#">Sport England</a></i></p>	

	The area of Lotts Meadow and White Cross has been used for informal sports and general recreation. The area of White Cross has been requested for an amenity area and will hopefully provide an amenity for ball games etc.	
9.3	<p>Are the public able to physically access the site?  <i>e.g. are there any public rights of way across the site? Or adjacent to the site? Has access been allowed on a discretionary basis? Is there public access to the whole site or only part? Is there good disabled access to the site? (A site can still be designated even if there is no public access.)</i></p> <p>Further information – <a href="#">Gloucestershire County Council</a></p>	
	<p>Yes, please refer to the LGS Map, figure 1 of the IACS (Section 1.2 above). This map shows the main Leckhampton footpath and the high density of footpaths providing access to all parts of the LGS from the surrounding urban areas. This is one of the compelling advantages to this LGS site, it provides green space where it is most valued, close to the large urban areas that it serves.</p> <p>Appendix 5 contains a description of footpaths and walks. In the January 2015 survey, completed by 1491 people, 774 completed forms (Appendix 3) 84% of respondents use KL/FL/CR triangle, 70% use Lott's Meadow, 63% the paths in smallholdings, 59% Moorend Stream Path, 41% White Cross and 52% the circular walk. (Appendix 3)</p>	
9.4	<p>Is the site used by the local community for informal recreation? And since when?  <i>e.g. dog walking; sledging; ball games etc</i></p>	
	<p>Yes, for many generations.</p> <p>The petition in 2011 attracted 2,000 signatures agreeing that people '... highly value easy accessibility for informal recreation.....' in Leckhampton fields</p> <p>The footpaths and fields accessible to the public are heavily used for walking and dog walking. The public consultation on the proposal in January 2015 has asked residents to say how and how often they use the land and the survey results from 1491 respondents show that 31% of respondents use the fields/paths daily or almost daily, while 37% use them a few times per week or many times per month.</p> <p>84% of respondents valued the Leckhampton Fields for the opportunity to exercise.</p> <p>86% of respondents use the fields for walking, 35% for dog walking, 22% for running/jogging. 44% of respondents use the fields with children and 13% for playing games. (Appendix 3)</p>	
10	<p>Evidence to show that the green area "holds a particular local significance, for example because of its <u>tranquillity</u>" (if applicable)  <i>Please indicate what evidence you have provided against each point.</i></p>	
10.1	Is this criteria relevant to this site ?	
	YES	
10.2	<p>Do you consider the site to be tranquil?  <i>e.g. are there are any roads or busy areas close by?</i></p>	
	Yes, please refer to references 1 and 2,	



	The public consultation survey in January 2015, completed by 1491 people (Appendix 3) showed that 82% of respondents particularly valued the rural atmosphere of Leckhampton Fields and 76% valued the tranquillity offered.	
10.3	Is the site within a recognised tranquil area? e.g. within the <a href="#">Campaign to Protect Rural England's</a> tranquillity maps	
	Have requested CPRE to advice and comment on the Leckhampton LGS application in connection with their tranquillity maps.	
11	<b>Evidence to show that the green area "holds a particular local significance, for example because of the richness of its wildlife"; (if applicable)</b> <i>Please indicate what evidence you have provided against each point.</i>	
11.1	Is this criteria relevant to this site ?	
	YES	
11.2	Is the site formally designated for its wildlife value? e.g. as a site of special scientific interest; a key wildlife site etc Further information - <a href="#">Natural England</a> ; <a href="#">Gloucestershire Centre for Environmental Records</a>	
	See Reference 1 - Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013, Section 3.2 Leckhampton Ecology, Wildlife and Habitat	
11.3	Are any important habitats or species found on the site? e.g. habitats and species listed in the UK priority habitats and species lists or Gloucestershire Biodiversity Action Plans or protected species or on the red/amber lists of birds of conservation concern. Further information - <a href="#">Natural England</a> ; <a href="#">Gloucestershire Centre for Environmental Records</a> ; <a href="#">National Biodiversity Network</a> ; <a href="#">RSPB</a>	
	See 11.2 and Reference 1 - Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013, Sections 3.2 Leckhampton Ecology and 3.3 The Natural Environment.  See Appendix 10 - The Leckhampton Environmental Report, 10 Year Bird Survey by Tony Meredith which shows the LGS is habitat for more than 45 species, of which 17 are red or amber listed, which is a testament to its importance and need for protection.	
11.4	What other wildlife of interest has been found on the site? Further information - <a href="#">Natural England</a> ; <a href="#">Gloucestershire Centre for Environmental Records</a> ; <a href="#">National Biodiversity Network</a> ;	
	Please See Reference 1 - Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013, Sections 3.2 Leckhampton Ecology and 3.3 The Natural Environment.  The petition in 2011 attracted 2,000 signatures agreeing that people '... highly value..., wildlife, environmental and ecological interest.' in Leckhampton Fields.	

#### [Appendix 1](#) Rationale for what we are proposing

	The public consultation survey in January 2015, completed by 1491 people (Appendix 3) showed that 62% of respondents valued the wildflowers, 75% the trees, 57% the hedgerows, 50% the wilderness area, 69% the birds, 58% the wild animals. 56% valued the streams and 36% valued the ponds.	
11.5	Is the site part of a long term study of wildlife by members of the local community? <i>e.g. long-term monitoring of breeding birds.</i>	
	<p>It's certainly used by many in the community for viewing wildlife, long term with the bird surveys. See Q 11.4 above and Appendix 10. The ancient hedgerows and two water courses are DEFRA protected habitats and are both rich in wildlife, the university has completed some ecology work in Leckhampton, and we will seek further advice on this question.</p> <p>The Perry Orchard to the south, on the corner of Farm Lane and Church Road has recently been awarded TPO status, this is extremely important to protect the habitat, more details can be provided if required.</p> <p>Hedgerows, traditional orchards and water courses are listed as Priority Habitats under the UK Biodiversity Action Plan (BAP) and the preservation of these habitats within the site is therefore promoted.</p>	
12	Evidence to show that the green area "holds a particular local significance, for <u>any other reason</u> "; (if applicable) <i>Please indicate what evidence you have provided against each point.</i>	
12.1	Is this criteria relevant to this site ?	
	YES	
12.2	Are there any other reasons why the site has a particular local significance for the local community?	
	<p>Leckhampton Village and the surrounding land is of course mentioned in the in the doomsday book of 1086 the settlement was divided among three landowners and recorded as Lechametone, meaning 'homestead where garlic or leeks were grown'.</p> <p>although a reinterpretation may point to general vegetables.</p> <p>Please see references [1] and [2] for the complete answer to this open question.</p> <p>Appendices 2 and 3 have details of petitions and surveys that provide evidence and demonstrate how much the Leckhampton Fields are valued by local people</p>	

[Appendix 2](#) Petitions signed by local to protect the Leckhampton Fields in 2011 and 2013

[Appendix 3](#) Public consultation questionnaire and results

[Appendix 4](#) - 2014 study on the effects of development on the views from Leckhampton Hill

[Appendix 5](#) – Leckhampton Fields Circular Walk

[Appendix 6](#) – The Smallholdings

[Appendix 7](#) - Robinswood Field

[Appendix 8](#) – Lotts Meadow

[Appendix 9](#) - White Cross Green Fields

[Appendix 10](#): Leckhampton Environmental Report

[Appendix 11](#): Letter of support from Martin Harwood MP

## LECKHAMPTON MAPS

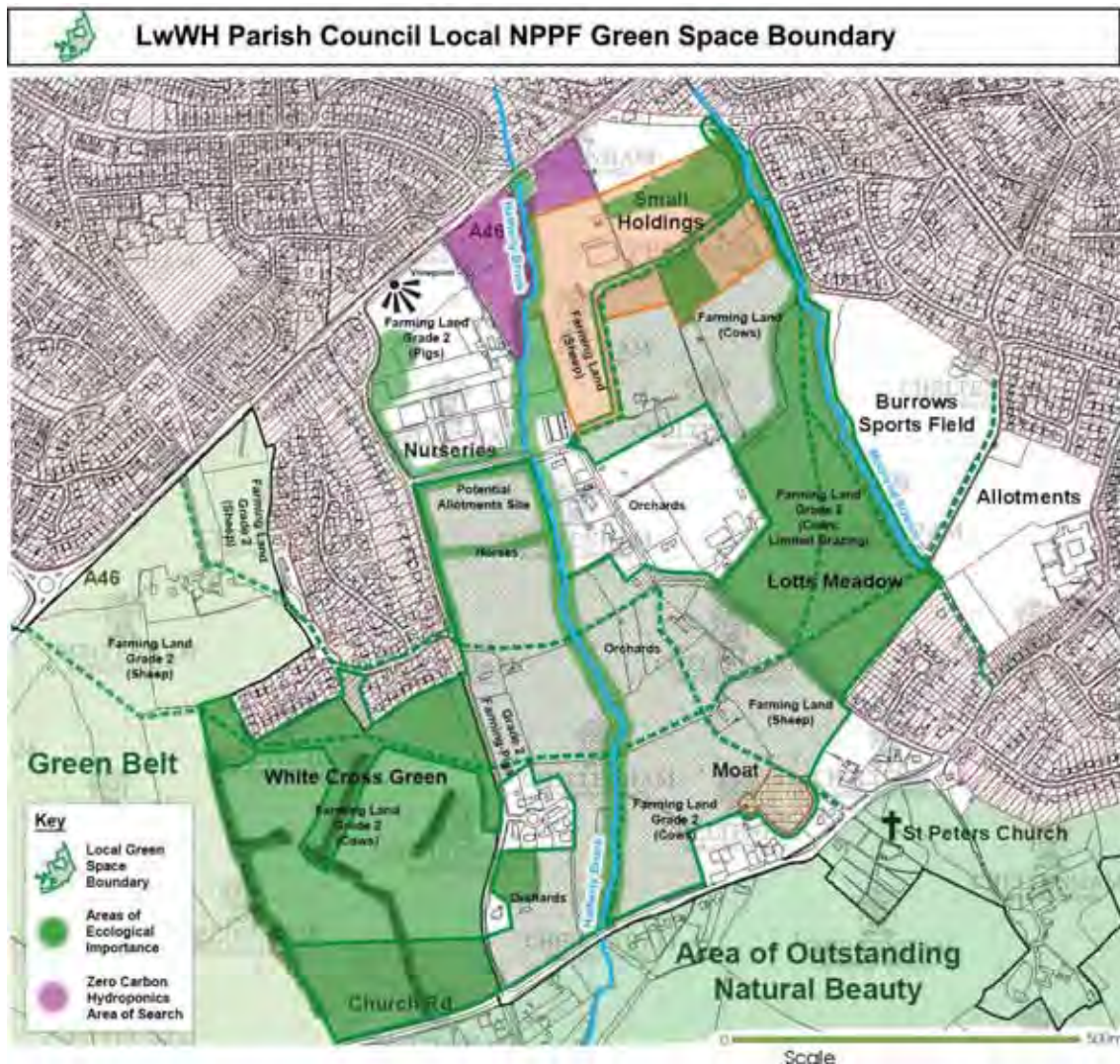


Figure 2 Leckhampton Ecology Map, Extract from Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013



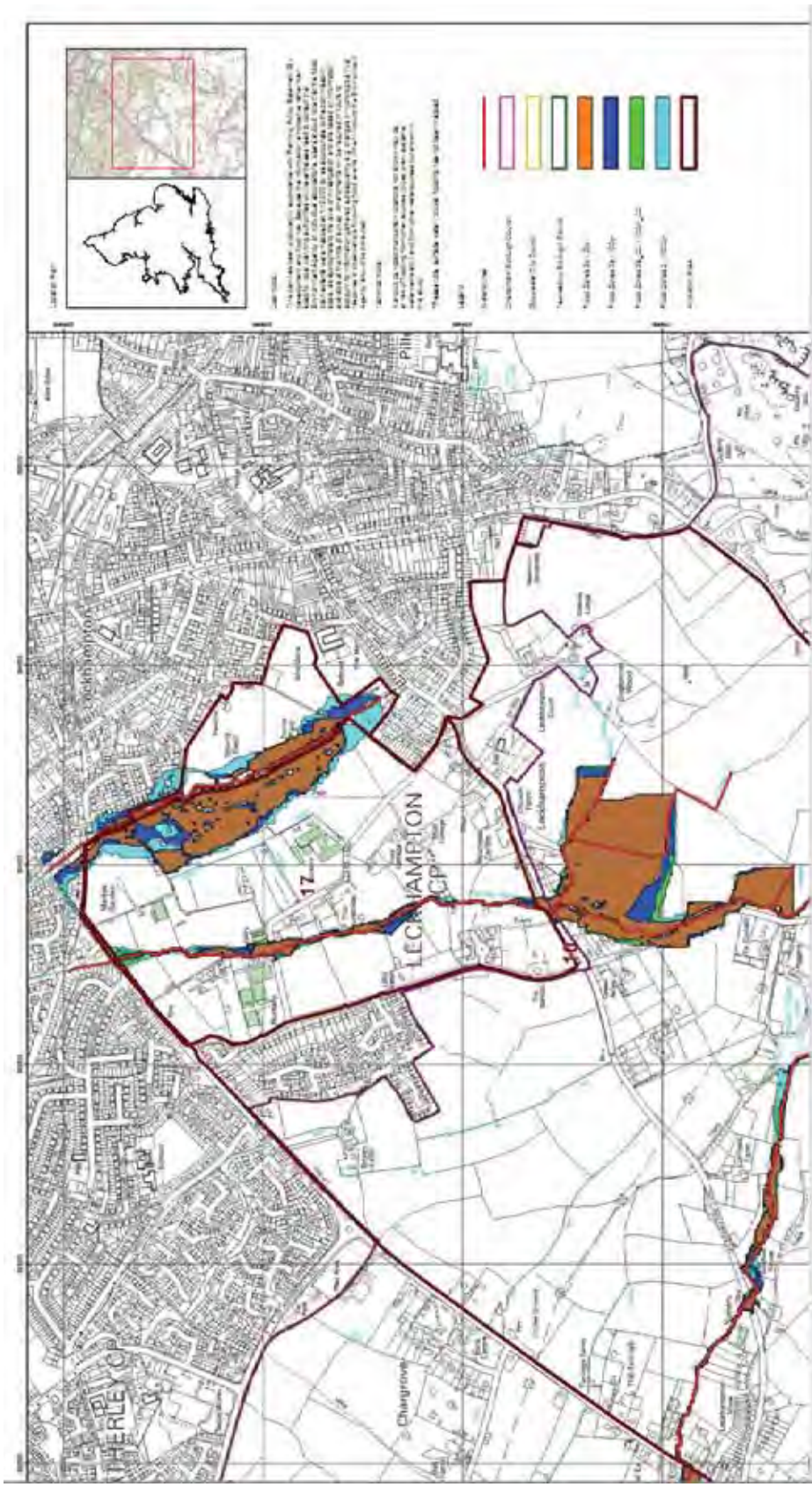
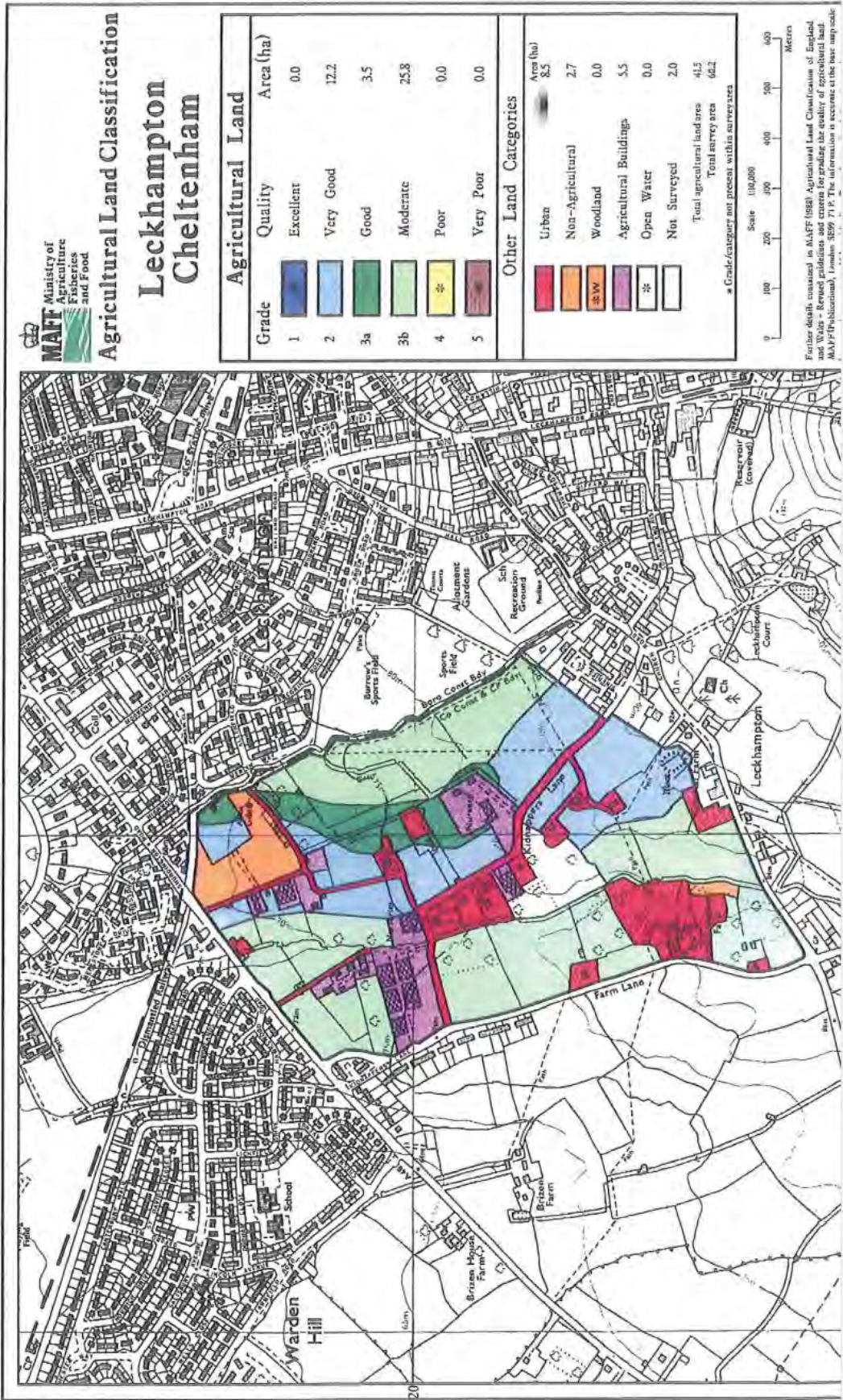


Figure 3 Halcrow JCS Flood Risk Assessment – Leckhampton





Figure 5 MAFF Agricultural Land Classification - Leckhampton





### Proposal and rationale for Leckhampton Fields Local Green Space

#### 1. Background

In August 2013, Leckhampton with Warden Hill Parish Council and Shurdington Parish Council jointly submitted a Neighbourhood Plan Concept and Local Green Space application to Cheltenham Borough Council and to Tewkesbury Borough Council (reference 1). The land proposed as Local Green Space (LGS) covered all of the Leckhampton Fields, both in Cheltenham Borough and in Tewkesbury Borough. The fields at Brizen Farm were subsequently removed from the proposed LGS as they are green belt, but the Tewkesbury Borough land west of Farm Lane is still included. This land is often referred to as White Cross Green or by the now out-dated Tewkesbury Borough planning designation SD2. Tewkesbury Borough Council does not wish at this time to assess LGS applications and has agreed that Cheltenham Borough Council will assess all of the Leckhampton Fields LGS application and will recommend to Tewkesbury Borough what decision should be taken with regard to the White Cross Green site.

The major part of the Leckhampton Fields lies in Cheltenham Borough and has an area of about 62 hectares. The land was last considered in a planning inspection in 1993. The planning inspector concluded that all of the Leckhampton Fields should be protected from development - *'because of their varied topography, landscape history, dense network of footpaths, and pedestrian access from several residential districts.'* And he said that *'it would be very sad indeed if development were to proceed at Leckhampton.'* A decade later in 2003, an expert study commissioned by the Cheltenham Borough Council reached the same conclusion suggesting that the land might be incorporated into the AONB (reference 2). In 2012, the JCS Landscape, Visual Sensitivity and Urban Design report also showed how special this land is - more so than any other site considered in the JCS.

The conclusion both in 1993 and in 2003 was that the landscape was very sensitive and that any major development would undermine the special quality of the area. This is one reason that the Neighbourhood Plan Concept submitted in August 2013 proposed that all of the area should be included in the LGS.

The Leckhampton Field have been the subject of a number of major planning applications over the past 45 year, all of which have been rejected both by Cheltenham and Tewkesbury borough councils. However, in 2005 suggestions about developing on land south of Cheltenham arose from the emerging South West Regional Spatial Strategy (RSS). The Gloucester-Cheltenham-Tewkesbury Joint Core Strategy (JCS) began in 2008 as a RSS implementation plan. Although the RSS was set aside in 2010 it was not formally revoked, for legal reasons, until 2013 and it has had a substantial influence on the JCS. Cheltenham Borough Council has consistently voted to protect the Leckhampton Fields and there have also been two petitions from local people for protecting the land, one in July 2011 and the second in December 2013 (appendix 2). Nevertheless, the emerging JCS has persisted in identifying the Leckhampton Fields as a potential strategic development site.

In September 2013, Bovis Homes and Miller Homes jointly submitted an outline application for development of 25.7 hectares of the Leckhampton Fields land to provide up to 650 dwellings plus a commercial centre and a primary school. This application was rejected by Cheltenham Borough Council on 31 July 2014. There were many grounds for this rejection including the major traffic problems involved in any development on the Leckhampton Fields. But undoubtedly the quality of the landscape and amenity value and the damage that development would do to this were also important factors.

The White Cross Green, the northern part of former SD2 site in Tewkesbury Borough has an area of 15.4 hectares and has been the subject of several planning applications. These have been refused and rejected on appeal, most recently in 2009. The site is however currently allocated for development, at least in part, in the Tewkesbury Plan. In 2014, the developers Redrow submitted an application (TBC 14/00838/FUL) to build on the whole site. This application is currently with Tewkesbury Borough Council for determination.

The Joint Core Strategy (JCS) in its Landscape and Visual Sensitivity and Urban Design Report 2012 classified all four of the fields on the White Cross Green (SD2) site as being of the highest landscape sensitivity and recommended there should be no development at all, or at most building only on one field at the north-east end of the site. A major reason for this recommendation is the serious affect that development on the site would have on the view from the nationally renowned viewpoint on Leckhampton Hill. This is discussed in more detail with photographic evidence in Appendix 4. Despite this recommendation not to allow development on the White Cross Green (SD2) land, some 11.3 hectares of the site have been earmarked for development in the JCS submitted for inspection in October 2014, with just a buffer strip of 4.1 hectares along the south side of the site kept as green land to provide some screening from the AONB and to keep Leckhampton Lane as a rural road. The buffer zone only goes a little way to mitigate the impact of development on the view from Leckhampton Hill. Worse still, however, Redrow's application proposes building over the whole the site, leaving no green buffer at all.

The reports in 1993 and 2003 concluded that there was no scope for any significant development on the Leckhampton Fields, and according to Cheltenham's MP, Martin Horwood, the Leckhampton Fields also served as one of the models for developing the Local Green Space legislation. But because the Leckhampton Fields have now been included as a strategic development site in the JCS, some development is likely to happen.

The JCS, as submitted, proposes an indicative figure of 1124 new dwellings on the Leckhampton Fields located roughly as follows:

Borough	Site	Hectares	Dwellings per hectare	Number of dwellings
Cheltenham	East of Kidnappers Lane	21.7	30	650
Cheltenham	East of Farm Lane	4.7	28.7	135
Tewkesbury	West of Farm Lane (SD2)	11.3	30	339
Total		41.7		1124

The 21.7 hectares of land east of Kidnappers Lane is net of 4.0 ha for the proposed primary school and commercial centre. The 4.7 ha east of Farm Lane is net of 1.1 ha for the Hatherley Brook flood plain. The 11.3 hectares west of Farm Lane is net of the 4.1 ha of screening buffer along Leckhampton Lane.

Removing the Leckhampton Fields from the JCS as a strategic development site has become practically impossible. This could mean that at least 450 dwellings would need to be accommodated, which is the minimum number for a strategic development site. Therefore, leaving aside the issues of sustainability, the Neighbourhood Forum has examined on a field by field basis where such development might be accommodated without doing unacceptable damage.

The Neighbourhood Forum contains members from both parish councils and also from Leckhampton Green Land Action Group (LEGLAG). The recommendations it has made,

which are explained in what follows, are based solely on a LGS perspective and disregard other impediments to development including sustainability. The analysis in Annex 2 of the Neighbourhood Plan Concept submitted in 2013 (reference 1) concluded that when the expected increase in traffic over the next 16 years is taken into account there may be no scope for any sustainable development at all on the Leckhampton Fields. The critical impediment here is the traffic through Church Road and the risk that this will gridlock in the morning peak traffic period. The evidence on this was included in the submission by Leckhampton with Warden Hill Parish Council on the Bovis-Miller application in 2014 and is equally applicable to the Redrow application.

**The Neighbourhood Forum and the two parish councils wish to stress that not including land in the LGS does not in any way imply agreeing that any major development should be permitted on that land, nor does it imply that in other circumstances the land would not merit inclusion in the LGS, but only that the land concerned does not sufficiently merit protection as part of the LGS when judged against the pressure from the JCS and the need to find some land for housing. It is a matter of identifying the least bad options.**

## 2. Cheltenham part of the Leckhampton fields

The area of the Cheltenham part of the Leckhampton Fields is roughly 62 hectares. About 31.5 hectares is land that was identified for building in the JCS, 24 hectares is land that the JCS excluded from development and the remainder is land that already has dwellings or an allowed planning application. Part of the reason for excluding this land from development relates to sustainability, but a large factor is the proximity to the AONB, the impact on views from the AONB and from Leckhampton Hill and Charlton Kings Common, the dense network of footpaths, the high amenity value for walking and dog walking to residents from a wide area north, south, east and west, the historical aspects including the Medieval moat, cottages, church and Leckhampton Manor, and the preservation in the area of rural character and scenic beauty largely untainted by modern developments. These are all factors set out in the reports of 1993 and 2003 and in the LGS application submitted in August 2013 (Reference 1).

All of this land excluded from development by the JCS has a top priority for inclusion in the LGS. It is all land that is very well used by local people through the network of footpaths and as open land. It is highly important in landscape value both locally and as viewed from the AONB and from Leckhampton Hill. Whilst residents heavily criticise the JCS for proposing any development at all on the Leckhampton Field, it must be recognised that the JCS team has correctly identified the most important land to protect, even if in the case of the White Cross Green (SD2) site other pressures have overruled.

On the Cheltenham part of the Leckhampton Fields, the land that the JCS has indicated as being suitable for development comprises three areas:

	Hectares
Northern Fields close to the A46 and north of the Leckhampton Fields	15.0
Circular Walk footpath	
Central fields east of Kidnappers Lane (enclosed within the Leckhampton Fields Circular Walk)	10.7
Land east of Farm Lane (including the Hatherley Brook flood plain)	5.8
Total:	31.5

### 2.1 The Northern Fields

The Northern Fields consist mainly of smallholdings and nurseries. The northern tributary of Hatherley Brook flows along the east side of the land and the main tributary flows through the middle. Flooding from these tributaries are significant constraints.

The main considerations from a LGS perspective are as follows:

1. The Leckhampton Fields Circular Walk, which is described with photographs in Appendix 5, runs along the public footpath on the south side of this land. This path is heavily used by local residents and also provides the route by which residents from the Shurdington Road and Warden Hill access the Leckhampton Fields for walking and dog walking. It is very desirable to preserve the attractiveness of this walk as much as possible.
2. The smallholdings have considerable rural charm. Appendix 6 contains 13 photos of the smallholdings and there are seven more photographs in Appendix 5. The livestock on the small holdings both north and south of the Circular Path includes sheep, pigs, hens, geese and ducks and has made this a very attractive walk for bringing children. Unfortunately, although some livestock remains, much of it has been lost in the last year or so because, in expectation of development, the land owners have offered only short term leases and evicted the tenants. However, the area could be restored if longer leases were offered.
3. In the north-west corner of the land there is a pig field that provides a fine view across to Leckhampton Hill. The field itself and the view are loved particularly by people travelling into Cheltenham on the A46. The value of this view at what is the gateway to Cheltenham was raised by councillors in considering the Bovis-Miller application on 31 July 2014.
4. This Northern Fields are furthest from the AONB and development here has the least impact on views from the AONB and from Leckhampton Hill. However, the A46 currently provides a clear boundary to Cheltenham as viewed from the AONB and this will be lost if significant development were permitted. Although the A46 is not conspicuous in the photographic evidence in Appendix 4, it is easily perceived by the human observer noticing traffic moving along the road.
5. At the west end of the land there are largely disused nurseries. These lie at the west end of the land. They are well screened by high hedgerows along Kidnappers Lane and to the east. This location is currently proposed in the developers' illustrative master plan as the site for the new primary school that would be needed if the full development of 1124 dwelling proposed in the JCS were to happen.
6. There are views of Leckhampton Hill not just from the pig field but all along the A46. These views are not as easy for motorist to enjoy because the angle of view to the Hill makes it more difficult to look at the view and keep an eye on the road. Nevertheless building on the land will change the A46 from a half-rural road at boundary edge of Cheltenham into being an urban road.
7. Although the northern fields have become disused and less attractive because of the offering of only short term leases and the eviction of tenants, they could be restored to their former quality if longer leases were granted and tenants were able to return.
8. Many local people greatly enjoy walking through the smallholdings. Residents in Warden Hill say that in the past some of the fields were open and used as amenity land by residents and children, particularly living in Shurdington Road and the east side of Warden Hill. Warden Hill has little amenity land and the smallholdings and Robinswood Field are important to residents. There is a strong case for at least including a reasonably wide ribbon of LGS along Hatherley Brook to provide a scenic route for residents to access the Leckhampton Fields more easily from Woodlands Road and Salisbury Avenue. This is already included in the Developers' Illustrative Masterplan.

The Northern Fields were considered for potential development in Annex 2 of the Neighbourhood Plan Concept submitted in August 2013. Four options were proposed. Option 1 was to include all of the land in the LGS, and this was the option actually put



forward in the LGS application. Option 2 excluded from the LGS the nurseries and fields to the west. Option 3 excluded all of the remaining land apart from the strip of smallholdings along the north side of the Leckhampton Fields Circular Walk, and option 4 excluded all of the Northern Fields from the LGS. The difference between options 3 and 4 is small and retaining the smallholdings on both sides of the Circular Walk is very desirable.

Options 3 and 4 recognised that it might be possible to sustain the most important 'city farm park' attractiveness of the smallholdings for children by moving some smallholdings from the Northern Fields onto the land south of the Circular Walk. The southern smallholdings have an area of only 1.6 hectares compared with the 10 acres of the smallholdings on the Northern Fields. But the streams, willows and other vegetation on this land make it attractive. There are also some also good views across these smallholdings to Leckhampton Hill.

The Illustrative Masterplan and outline planning application submitted by Bovis Homes and Miller Homes in September 2013 identified the Northern Fields as the main area for high density development. There is about 9.2 hectares of land available for housing after subtracting 4.0 hectares for the proposed primary school and commercial centre and about 1.8 hectares for balancing ponds and the channel of Hatherley Brook. A LGS corridor along Hatherley Brook would not add to the 4.0 hectares.

An issue when the Bovis-Miller application was rejected by the CBC Planning Committee in July 2014 was why the developers were proposing such a large commercial centre. Good shopping facilities are available in the Bath Road and in Salisbury Avenue and it is better that new residents should help support the commercial viability of these existing centres. All that would be needed locally is a convenience store or small supermarket like the Coop in Leckhampton Road. There is also an argument that this local store should be located in the middle of the overall development so that it is within easier reach of all residents including the White Cross Green (SD2) site, which will otherwise be extremely car dependent. Scaling the commercial centre back might allow the pig field and its cherished view to be preserved, as discussed earlier.

In looking for the least bad options, the Neighbourhood Forum concluded with great regret that despite some of the reasons above for preserving the northern fields as LGS, options 1 and 2 in Annex 2 of the NP Concept are no longer viable given that the JCS has now been submitted. It therefore recommends adopting option 3. It also recommends scaling back the commercial centre or removing it entirely.

Leckhampton with Warden Hill Parish Council (LWWH PC) has been made well aware by some residents in Warden Hill that they believe strongly that the Northern Fields should be retained in the LGS. The Parish Council is undertaking a public consultation of residents in Warden Hill and in Leckhampton to allow people to express their views and concerns. The consultation questionnaire is at appendix 3.

## **2.2 The Central Fields**

The Central Fields are bounded by the Leckhampton Fields Circular Walk and Lotts Meadow. They can be divided into three areas:

1. Central nurseries/orchards These nurseries and orchards lie between Kidnappers Lane and Lotts Meadow. They have a combined area of about 3.5 hectares, net of an existing house and garden at the east corner.
2. Robinswood Fields North of the central nurseries/orchards is a field of about 2.4 ha net of a house and garden named Robinswood in the centre. To the north of Robinswood Field, there are smallholdings with a combined area of about 0.3 ha.

3. Fields north of Lotts Meadow To the east of Robinswood Field, there is a pair of fields with a combined area of about 2.7 hectares and to the north of these there are two smallholdings with a combined area of about 1.2 hectares.

### Central nurseries/orchards

There is no public access to the central nurseries/orchards area and it is also reasonably well screened by high hedges and trees on the western boundary along Kidnappers Lane and on the south and east boundary with Lotts Meadow. The main nursery has been derelict for some years and the smaller nursery at the south end of this area was closed in 2014 in expectation of development. The orchards are old and quite attractive and worthy of preservation. There are also tall trees within this site that provide additional screening particularly when this area is viewed from Leckhampton Hill.

The Neighbourhood Forum has looked hard at whether development could occur on this site without spoiling the local area or the view from Leckhampton Hill. This is very difficult judgement to make. The site is at the south end of the central fields and development could have a large impact on the views from the AONB and particularly from Leckhampton Hill. This is discussed in Appendix 4. It would be essential to ensure that the hedgerows were fully preserved on the west, south and east side so that any development is well screened. The developers' illustrative masterplan does preserve these hedgerows, but to be safer they need to be included in the LGS.

Although the hedgerows may be able to screen the site sufficiently from view locally, they will not screen it from view from Leckhampton Hill. However, as discussed in Appendix 4, the line of poplars along Kidnappers Lane (which all have tree preservation order) does provide considerable screening. Provided that any development were in keeping with a semi-rural location it could be visually acceptable. The existing development at Leckhampton Farm Court on Farm Lane, although much smaller, is an example of how this can be achieved. The Bovis-Miller application already proposes lower density development in the nurseries/orchards area and it should be feasible to achieve an appropriate semi-rural character.

One important consideration is to maintain sufficient visual separation between any development on the nursery/orchards site and any development on the land west of Robinswood Field. The separation is maintained by a strip of Robinswood Field. The photographic evidence in Appendix 4 shows that this may be sufficient, but it would depend on how close any development on the Nurseries/Orchard site came to the northern boundary of the site and also on roof heights.

The Neighbourhood Forum originally considered leaving the central nurseries/orchard area within the LGS whilst noting that there was potential for suitably sympathetic development on this site. However, the advice from Elin Tattersall of GRCC on behalf of CBC has been to remove this area from the LGS, subject to the above caveats about the need for any development to be very sympathetic to the location and to protect all the screening including the internal trees. The Forum has accepted this recommendation.

### Robinswood Field

This field is well used by local people for walking and dog walking, especially for residents in Shurdington Road and Warden Hill. The Leckhampton Fields Circular Walk runs along the west side of this field and there are also several paths round the north, east and south side, so that people can make a circuit of the field. The field gives good views, particularly towards Leckhampton Hill and of the smallholdings with their willows and other vegetation. This is

land of good scenic quality and public utility and needs to be included in the Local Green Space. Appendix 7 has the photographic evidence.

### Fields north of Lotts Meadow

The case for including the fields north of Lotts Meadow in the LGS is less clear cut. The public does not have access to these fields. However, there is no doubt of their importance to the view from the AONB, particularly from Leckhampton Hill, and from the Leckhampton Fields Circular Walk which runs round the east and north side of the fields.

It is worth explaining here the importance to the view from Leckhampton Hill. This is an iconic view, one of the main highlights of the Cotswold Way National Trail, a viewpoint featured in guide books and one that people visiting Gloucestershire particularly come to see. There are two famous viewpoints: one from the observation table, which is the viewpoint marked on the OS map, and the second about 100 metres to the south with the Devil's Chimney landmark in the foreground. There are three main views from the observation table: the view west across the green belt gap towards Wales, the view north-west across Cheltenham to the Malvern Hills and Shropshire Hills, and the view north along the Cotswold Scarp. It is the view west that is particularly affected by development on the White Cross Green (SD2) site and the view northwest that is particularly affected by any development on the Cheltenham part of the Leckhampton Fields.

The Neighbourhood Forum did a photographic study of all the main views from the various viewpoints on Leckhampton Hill and Charlton Kings Common and some of the findings and photographic evidence are shown in Appendix 4. For most of these viewpoints and in particular the observation table and Devil's Chimney, the view across Lotts Meadow and over the two fields north of Lotts Meadow is very important in creating the sense of distance and avoiding the Cheltenham urban area encroaching too close.

The Neighbourhood Forum has looked at whether some development could occur on these fields by exploiting the screening provided by the high hedgerow and trees at the north end of Lotts Meadow. The trees provide only partial cover even in summer. The land is sloping away north at an angle of about 1 in 35, but the angle of view from the top of Leckhampton Hill is about 1 in 8. So although the hedgerow would soften any development, it would not provide enough screening.

The Neighbourhood Forum therefore recommends that the fields north of Lotts Meadow should remain in the LGS. However it is worth noting that it would be possible to locate a balancing pond on these fields serving development on the central nurseries/orchard area, and this could allow a reduction of about 0.25 ha in the size of the balancing ponds on the Northern Fields, making space for up to 10 more dwellings there. Not developing on Robinswood Field and the fields north of Lotts Meadow might also mean that balancing pond capacity was not needed for these fields. This might reduce the amount of balancing pond required on the Northern Fields by about 0.5 ha.

### **2.3 Fields east of Farm Lane**

The Ordnance Survey map shows three fields east of Farm Lane, but in fact the two southern fields are merged. The combined area of the fields is 4.7 hectares net of 1.1 hectares in the Hatherley Brook flood plane that is proposed in the Illustrative Masterplan to be used for balancing ponds. The field at the north end of Farm Lane is used for crops and is not accessed by the public. The southern fields are used for grazing horses. There is a public footpath across to this land which is part of the Leckhampton Fields Circular Walk. Photographs of the fields are included in Appendix 5.

There are two main factors that argue in favour of including these fields within the LGS. The first is the effect that development would have on the rural aspect. Currently, when travelling along Farm Lane, there are houses on the west side but hedgerows and fields on the east side. The feeling is predominantly one of countryside. If the fields east of Farm Lane are developed, it would alter the nature of the area making it much more urban. The Illustrative Masterplan is careful to retain hedgerows and to protect the very attractive rural character of Kidnappers Lane. The hedgerows will also partly screen any development east of Farm Lane. Nevertheless, the degree of development proposed along Farm Lane would largely convert it into an urban road.

The second factor is the effect on the view from Leckhampton Hill and the AONB. Currently the Lanes Estate and the older housing on the west side of Farm Lane has the appearance of a peninsula of housing jutting out from Cheltenham rather than being part of the Cheltenham conurbation. This is very important in maintaining a predominantly rural view across the Severn Vale. At present, as shown by the photographic evidence in Appendix 4, when looking from the main viewpoints the eye goes easily across the Lanes Estate to the green belt land of Brizen Farm and beyond, maintaining an overall impression of countryside. To preserve this it is very important not to broaden the peninsula. This becomes even more important if development were to happen on the White Cross Green (SD2) site. Building on the land east of Farm Lane would turn the peninsula into a much larger mass connected to any development permitted on the Northern Fields. Given the likelihood that some development will happen both on the Northern Fields and on the White Cross Green (SD2), there is a strong argument for keeping the land east of Farm Lane undeveloped.

The Forum looked at the possibility of building just on the north field. But this field is quite conspicuous from the main viewpoints on Leckhampton Hill, as again shown in the photographic evidence in Appendix 4. As with developing on White Cross Green (SD2) site), developing on the central nurseries/orchards site would also make it more important not to develop on the fields east of Farm Lane. It is the same argument of trying to maintain depth of view and to avoid creating a solid conurbation. As noted by the Inspector in 1993 and by the 2003 study, the special character and beauty of the Leckhampton Fields is fragile. Developing on the fields east of Farm Lane would be a step too far.

## **2.4 Land west of Farm Lane – White Cross Green (SD2) site**

The White Cross Green (SD2) site was not part of the land considered by the Inspector in 1993 or in the 2003 study. As already mentioned, however, the whole of the site was judged in the JCS Landscape and Visual Sensitivity and Urban Design Report 2012 to be of highest landscape sensitivity and the report recommended there should be no development on the land, or at most only development on the north-east field - one of the four fields on the site. The JCS study on changes to the green belt rated the White Cross Green (SD2) site as the top priority for inclusion in the green belt. When viewed from the main viewpoints on Leckhampton Hill, the White Cross Green (SD2) site sticks far out across the line of the green belt south of Cheltenham, as shown in the photographs in Appendix 4.

The impact of the White Cross Green (SD2) site on the AONB and on the views from Leckhampton Hill is one of the key issues. To mitigate this impact, the Developers' Consortium Illustrative Masterplan includes a green buffer zone between Leckhampton Lane and the development. This buffer zone has an area of 4.1 hectares. It is about 90 metres deep at its eastern end and 160 metres deep at its western end. This widening is designed to reduce the impact of any development on the view from Leckhampton Hill across the green belt south of Cheltenham. The southwest part of the site protrudes particularly far over the line of the green belt. So reducing the extent of the development on the west side does help to reduce the impact on this view. The Illustrative Masterplan also proposes planting a community orchard in the buffer zone to provide screening and soften the edge of



development. These are all mitigating features that were required in the application that was rejected in 2009 and which have been carried forward in the Tewkesbury plan and in the JCS as well as in the Illustrative Masterplan.

A second important purpose of the buffer zone and screening is to preserve Leckhampton Lane as a country road. This is a very attractive lane along the edge of the AONB and a very large number of people drive along it each day and benefit from its scenic quality.

Redrow in its recent application has somewhat brazenly proposed to disregard the buffer zone and to build right up to Leckhampton Lane. This emphasises how important it is to protect the buffer zone as a local green space. The Developers' Consortium Illustrative Masterplan shows walks through the buffer zone connected to parts of the proposed development and an informal kick-about area as well as the community orchard. So the buffer zone would also have the appropriate public utility for inclusion in the LGS.

The White Cross Green (SD2) site currently consists of open lightly grazed pasture. It affords fine views both of the Cotswold scarp and of the neighbouring countryside. It also includes a number of ancient hedgerows and the field structure dates from before the Enclosure Act. In the Developers' Consortium Illustrative Masterplan the hedgerows are preserved as four small green spaces that are linked by roads and footpaths. This is a good approach and the Neighbourhood Forum has partially adopted it in the LGS by proposing a LGS strip along the north-south section of hedgerow connecting the buffer zone in the south with a proposed LGS amenity space in the north. Footpaths running either side of the hedgerow would also provide a route by which people in the Lanes Estate or walking on the Cheltenham Circular Path could easily access the buffer zone and its orchards.

Preserving the ancient hedgerows is important both for the wildlife and history. The Redrow application proposes removing all of these ancient hedgerows, again disregarding the Illustrative Masterplan. The hedgerows have recently been cut back heavily, maybe with the aim of reducing their ecological value. This demonstrates how vital it is to protect these important features through LGS designation.

The Cheltenham Circular Footpath runs across the site and provides public access to the north part of the site. All four fields are open and the public can roam over the whole area of the site. The north part of the site is well used by residents in the Lanes Estate as amenity land. The Lanes Estate was built in the 1970s at a time when there was less consideration about amenity space. The estate is quite high density with about 22 dwelling per hectare - mostly four bedroom family homes. However, there is little amenity space within the Estate itself apart from the surrounds of the Lanes balancing pond and a small area at the south end of the Estate. For this reason, the White Cross Green (SD2) land along the Cheltenham Circular Footpath adjacent to the Estate has always been used as local amenity space by residents. Local people are justifiably concerned that development on the White Cross Green (SD2) site would remove this space. A village green application was submitted to protect the land and was scored maximum marks in all four categories. It was withdrawn due to a point of law brought up by the QC.

The question is how much LGS is appropriate as amenity space and where it should be located. As discussed already, there is an informal kick-about area included in the buffer zone and this could be accessible via the hedgerow footpaths. But this kick-about area would be about 500 metres away depending on what routes were provided through any development, and would be too remote for children in the Lanes Estate to use without accompanying parents. The Neighbourhood Forum is therefore proposing that there should be a modest area of local green space between the Lanes Estate and any development on the White Cross Green (SD2) site. As well as providing amenity space, this would also:

- A. Provide a route for the Cheltenham Circular Path that avoids the footpath having to be routed through the Estate;
- B. Provide a kick-about area on the east side between the Cheltenham Circular Path and the Lanes Estate with an area of about 1 ha;
- C. Significantly narrow the width of the development as viewed from Leckhampton Hill and create the visual impression of separation between the two developments, again helping to avoid the appearance of a large housing mass;
- D. Provide a strip of separation land of about 0.5 ha between Brizen Lane and the new development.

It is worth emphasising bullet C. The proposed 1 ha of LGS at the north east corner of the site not only narrows the width of the site when viewed from Leckhampton Hill but, as mentioned earlier, allows the eye to skip over a narrow part of the Lanes Estate to the Brizen Farm land beyond and from there along the green belt. This can be seen from the photographic evidence in Appendix 4.

The proposed area of the amenity space in the LGS is 1.5 hectares which accords with the government amenity space guideline of 2.43 hectares per 1000 residents. It is worth noting that the original Village Green Application sought around 5 hectares of protected land, much larger than the LGS area being proposed now.

The LGS area actually shown on the submitted map is larger than 1.5 hectares. This is because some of this area would be taken up by the balancing pond for any development and some space on the east side would be taken up by the road exit onto Farm Lane. The green space shown also includes the existing orchard/hedgerow between Farm Lane and the site.

## 2.5 Conclusion

As noted earlier, there are arguments to justify including all of the land in the LGS, as was done when the application was submitted in August 2013. It is an issue of identifying the least bad options. Noting this and the caveat at the end of section 1, the parish councils propose the LGS boundary shown in the accompanying map. This adopts Option 3 for the Northern Fields excluding them entirely from the LGS apart from the strip of smallholdings along the footpath. The Forum recommends that there should be consultation with Bovis-Miller and with tenants of the smallholdings to determine whether it would be possible to move some small holdings onto the land to the south of the path and what would be the best way to restore and preserve the 'city farm park' benefit of this area which local people have found such a delight in the past, whilst also meeting the needs for development.

It is important to reinforce the caveats about retaining existing trees and screening. These do a great deal to soften the impact of any development, whether viewed locally or from Leckhampton Hill. The three developers, Bovis Homes, Miller Homes and Davis Homes, who produced the Illustrative Masterplan and strategic concept for the area were careful about protecting important hedgerows. But Redrow has demonstrated that developers cannot always be relied on to show such sensitivity. This is the reason that these hedgerows need to be retained in the LGS.

The Parish Council decided after discussion with GRCC that it should undertake a full public consultation with the local community on the proposals. The consultation leaflet and questionnaire is at appendix 3. The closing date for the consultation is 23 January 2015 and the Council hopes to be able to submit the analysed findings from the consultation together with the responses by the middle of the following week. The Council did not undertake public consultation when it submitted the Neighbourhood Planning Concept and Local Green Space application in 2013 and it is timely to do this now.

### **PETITIONS SUBMITTED IN THE PAST 4 YEARS FOR PROTECTING THE LECKHAMPTON FIELDS FROM DEVELOPMENT**

1. Petition submitted to Cheltenham Borough Council and Tewkesbury Borough Council in July 2011 with over 2000 signatures. The wording of the petition reads:

To Cheltenham Borough and Tewkesbury Borough Councils:

We the undersigned\* urge the above Councils to allocate\*\* a designated area to the South of Cheltenham (including the land formally known as Leckhampton White Land, Brizen Farm and Land West of Farm Lane) that shall be protected from inappropriate large scale development. This land is of high community interest due to its attractiveness, views in and out of the AONB and the contribution it makes to the setting of Cheltenham. We also highly value easy accessibility for informal recreation, local food production, wildlife, environmental and ecological interest. We suggest that although parts of the area are in Shurdington, the designated land may for convenience (at the Councils' discretion) become known as: LECKHAMPTON COUNTRY PARK.

\*All signatories declare that they have not signed another copy of the petition.

\*\*In their Joint Core Strategy, Local Development Framework or another appropriate planning policy or document

2. Petition submitted to Cheltenham Borough Council on 16 December 2013 with over 1000 signatures. The wording of the petition reads:

#### **SAVE THE LECKHAMPTON FIELDS**

We, the undersigned, call on Cheltenham Borough Council to remove the Leckhampton fields from further consideration within the Joint Core Strategy. The Council must do everything in its power to protect the beautiful and valuable open countryside south of Leckhampton from inappropriate and unsustainable development. If the developers go ahead and build 1,075 new houses on the Leckhampton fields it would cause traffic chaos, exacerbate the serious flooding that has occurred in the area, overwhelm local school and medical health provision, destroy much loved fields and hedgerows and blight Cheltenham with urban sprawl and overcrowding. The Council must insist that brown-field sites are built on first before even considering the destruction of the Leckhampton fields.

The petition received over 1000 signature, the number required to require a Borough Council debate. No further signatures were collected once the 1000 figure had been reached. The petition would certainly have gained even greater support if it had been circulated widely.

## Letters of Support from local Councillors and organisations

To Leckhampton Neighbourhood Forum – Attn Margaret White (Forum Secretary)

From County Councillor for Leckhampton and Warden Hill, Iain Dobie

Dear Margaret,

I wish to support the application for Local Green Space status for key areas of Leckhampton Fields.

This is an area I have known well since my childhood. I was born and raised on the (then new) Warden Hill estate, just 100 metres North of The Fields' Shurdington Road boundary.

As a child I escaped from the large housing development where I lived to play in Leckhampton Fields' orchards and meadows, and caught crayfish with friends in its clear stream. I walked its pathways up to Leckhampton Hill to collect fossils and explore the Area of Outstanding Natural Beauty below which Leckhampton Fields nestle.

I wish future generations of urban children and families to enjoy the same pleasures in this special green space, which surely grows in natural value as Cheltenham's housing stock continues its expansion to the South and West.

As Martin Horwood MP has previously said, Leckhampton Fields are exactly the kind of area which the Local Green Space legislation was designed to protect.

Regards,

Iain Dobie

County Councillor for Leckhampton and Warden Hill

Name, address and email supplied

30 January 2015

The Secretary,  
Neighbourhood Forum Group

Dear Sir,

### LOCAL GREEN SPACE AT LECKHAMPTON

I should like to add my support to Leckhampton with Warden Hill and Shurdington Parish Councils in their campaign to protect the green fields at Leckhampton and ensure that they remain available for local inhabitants and visitors to enjoy.

I write as a longstanding resident of Leckhampton who chose to live here on the outskirts of Cheltenham, where I and my family could benefit from the peaceful rural environment. During my long involvement with the Leckhampton Local History Society I have come to realise the historic importance of the village, which is more than just a suburb of Cheltenham. Although I am writing in a personal capacity, I feel that many of the Society's members would agree with my sentiments.

Leckhampton was mentioned in the Domesday Book. Its church and the manor house (one of the oldest domestic buildings in Gloucestershire), built of local stone, date back to the early 14<sup>th</sup> Century but remain integral to community life. Though just outside the area in question, they enhance immeasurably the view from the fields towards the Cotswold escarpment. Building houses over these level open spaces would totally destroy this unique and precious prospect, which is admired not only by local inhabitants but by many visitors, including some who come from overseas to see where their ancestors had lived.

The fields to the north of the Moat are the site of medieval settlement, traces of which would be obliterated if houses were built over them, and the prospect of any future archaeological survey would be gone.

While space for new housing clearly has to be found, and to a casual observer the lands in Leckhampton might seem suitable, I firmly believe that they are too historically valuable to be treated in that way and that later generations would not forgive us for allowing such an irrevocable step to be taken.

Yours sincerely,

Eric Miller  
Chair Leckhampton Local History Society

From: Burns, Andrew (NE)  
Date: Tuesday, 10 February 2015  
Subject: Local Greenspace for Cheltenham  
To: Elizabeth Pimley

Mrs Pimley,

Further to your recent email Natural England does support your application for a Greenspace, near Leckhampton to protect the Cotswold AONB, and provides a space for wildlife, and a component of green infrastructure.

Local Green Space is found in the government's National Planning and Policy Framework in paragraph 76 and 77, and of course it is cited in footnote 9 in the same framework, the one that also states that development should be restricted in the AONB and this gives Local Green Space supports in decision taking.

I hope this reply is timely for your purposes in designating this Local Greenspace.

Yours sincerely

Andrew Burns

***Jonathon Porritt***  
*Address, telephone number and email supplied*



9<sup>th</sup> February 2015

Dear Margaret

Thank you so much for sending me all the relevant materials regarding the Local Green Space application by Leckhampton and Warden Hill and Shurdington Parish Councils to Cheltenham Borough Council.

I've reviewed all of these documents with great interest, and with a gathering sense that this just has to be the right time for this crucially important area to be afforded the special status it deserves as a Local Green Space.

I wish you and all your colleagues in the Leckhampton Neighbourhood Forum all the very best in this timely and highly significant intervention.

Yours sincerely

A handwritten signature in black ink that reads "Jonathon Porritt". The signature is written in a cursive, flowing style with a large initial 'J' and a distinct 'P'.

Jonathon Porritt

## **In support of The local Green Space – Leckhampton Fields**

In this South West area of Cheltenham we are fortunate to live in one of the most beautiful parts of this Country. It is therefore vitally important that this is recognised by all statutory bodies and elected members and for them to realise the value local people place on this part of our countryside.

The views, wild life, and recreational space for our future generation are so valued at this time from the pressure of developers wanting to build.

In my ward of Warden Hill we suffered greatly from severe flooding in 2007 with many homes having to be vacated, for some, up to 2 years before they could return.

It is so vital that our green fields in the Leckhampton area are protected from being built on for the protection of those living further down from the water flow.

I therefore appeal to those decision makers that our heritage of beautiful green land is protected within the Local Green Plan

Sincerely  
Councillor Anne Regan  
Warden Hill Ward.

5 February 2015

Dear Mr Stephenson

CPRE supports in principle the application made by Leckhampton with Warden Hill Parish Council for part of the open land between A46 Shurdington Road and Church Road/Leckhampton Lane (known as Leckhampton Fields) to be designated an area of Local Green Space.

Much of the area proposed is currently and has historically been used for informal recreational purposes, including horse-riding, dog walking, running, walking, children's play and other such activities that contribute to the health, wellbeing and quality of life of those living on this side of Cheltenham. We are particularly concerned to protect the unspoilt and highly valued area to the SE which abuts, and thus affects the setting of the Cotswolds AONB.

Providing Local Green Space protection, and its inclusion in the forthcoming Cheltenham Local Plan, will be particularly important should the Joint Core Strategy be approved in its present form. It would clearly contribute to any shortfall in the requirement to provide informal open space within the Cheltenham urban area.

Yours sincerely

Major Tom Hancock DL

### APPENDIX 3- Public consultation January 2015

Results (please see wording of introduction and form below)

Total number of completed forms = 762 (12 more have been added, total 774)

Summary for questions 1 to 4 (with no weightings)					Combined	Important (one tick)	Particularly important (two ticks)
	Number responding		1466				
	Number of responses counted		1421				
1	How often do you use the fields / paths?	Daily or twice daily	85		6%		
		Almost daily	351		25%		
		Few times per week	244		17%		
		Many times per month	287		20%		
		Few times per month	236.5		17%		
		Occasionally	172		12%		
2	How do you use the fields?	Walking	954	27 1	86%	67%	19%
		Dog walking	351	14 1	35%	25%	10%

		Running / jogging	278	40	22%	20%	3%
		Playing games	182	7	13%	13%	0%
		With children	504	11 5	44%	35%	8%
		Relaxing	585	85	47%	41%	6%
		Other	271		19%		
3	What areas / paths do you particularly use?	Lotts Meadow	774	22 5	70%	54%	16%
		KL/FL/CR triangle	959	23 1	84%	67%	16%
		White Cross Green	457	13 2	41%	32%	9%
		Moorend Stream Path	709	13 3	59%	50%	9%
		Path in smallholdings	661	23 7	63%	47%	17%
		Robinswood	491	70	39%	35%	5%
		Circular walks	669	71	52%	47%	5%
4	What do you most value?	Opportunity for exercise	774	42 1	84%	54%	30%
		Views of Leckhampton Hill	814	45 1	89%	57%	32%
		Views across the fields	815	37 7	84%	57%	27%
		Wildflowers	740	14 7	62%	52%	10%
		Trees	866	19 7	75%	61%	14%
		Orchards	520	51	40%	37%	4%
		Hedgerows	804	18 0	69%	57%	13%
		Rural atmosphere	885	34 9	87%	62%	25%
		Variety	523	57	41%	37%	4%
		Tranquillity	803	28 3	76%	57%	20%
		Farm animals	705	13 9	59%	50%	10%
		Horses	453	61	36%	32%	4%
		Birds	789	19 3	69%	56%	14%
		Wild animals	652	16 8	58%	46%	12%
		Old nurseries	309	24	23%	22%	2%
		Smallholdings	435	66	35%	31%	5%
		Network of footpaths	811	29 3	78%	57%	21%
		Circular walks	587	15 3	52%	41%	11%
		Medieval moat	431	62	35%	30%	4%
		Ponds	459	58	36%	32%	4%
		Streams	655	13 4	56%	46%	9%
		Medieval cottages	465	92	39%	33%	6%
		Wilderness areas	574	14 3	50%	40%	10%

## Wording of introduction and form (not formatted)

LECKHAMPTON WITH WARDEN HILL PARISH COUNCIL

## **PUBLIC CONSULTATION ON PROTECTION OF LOCAL GREEN SPACE IN SOUTH CHELTENHAM**

Cheltenham Borough Council is developing the new Cheltenham Plan and asking for submissions for areas to be protected permanently from development under the new Local Green Space (LGS) legislation. The Parish Council has identified four areas in the parish: (1) the **Leckhampton Fields** (shown on the map overleaf), (2) Weavers Field (in Warden Hill), (3) the fields around Leckhampton Court and St. Peters Church, and (4) the fields below the west end of Daisybank Road. We have been advised that because (3) and (4) are in the Area of Outstanding Natural Beauty (AONB), we do not need to submit a LGS application for them at this stage, and the protection for Weavers Field is already very strong, particularly because of its royal QEII status.

For the Leckhampton Fields, we have already submitted a LGS application jointly with Shurdington Parish Council in August 2013. In this we proposed that all of the Leckhampton Fields should be in the LGS. We are now updating this because the decision by the borough councils to include the Leckhampton Fields as a strategic development site in the Joint Core Strategy has forced us to cut back on the size of the LGS. As part of this update we need to consult local residents on what we are now proposing. This consultation is very **URGENT** because its output has to be delivered to Cheltenham Borough Council by **26 January**. **If you value the Leckhampton Fields and the views from Leckhampton Hill, please respond now.**

### **HOW TO RETURN THE COMPLETED QUESTIONNAIRE TO US**

Please either post your questionnaire to Clerk, LWWH PC, 7 Aldershaw Close, Up Hatherley, GL51 3TP in time **to arrive by 23 January** or drop it off by 23 January to one of the following addresses from which the Parish Council will collect it.

**Leckhampton:** The Moat, Church Rd (opposite St Peter's); 21 Collum End Rise; 165 Leckhampton Rd; 8 Eynon Close; 56 Naunton Lane; 153 Old Bath Rd; 347 Old Bath Rd; 5 Merlin Close; 11 Arden Rd; 3 Brizen Lane. **Warden Hill:** 38A Canterbury Walk; 1 Friars Close; 115 Salisbury Ave.

Or scan into pdf the questionnaire page plus the back page if used and extra pages if inserted and send as an email attachment to **[lwwhpc@yahoo.co.uk](mailto:lwwhpc@yahoo.co.uk)** - please include your name and address in the email.

### **WHAT WE ARE NOW PROPOSING**

You can view the Parish Council's submission by going to: [www.lwwhpc.org.uk](http://www.lwwhpc.org.uk) . The boundary we are now proposing for the LGS is shown on the map overleaf. The cross-hatched area is the revised LGS. We are proposing to exclude the Nurseries/Orchards between Kidnappers Lane and Lotts Meadow because they are not accessible to the public and are well screened. Sympathetic development here might be acceptable from a landscape perspective. We are also proposing to exclude most of the Northern Fields even though there are many good reasons to keep them in the LGS, as we have explained in the



submission. But we have left a corridor along Hatherley Brook to give footpath access from Warden Hill.

On the land west of Farm Lane we are proposing a green buffer zone along Leckhampton Lane to help soften any development when viewed from Leckhampton Hill and the AONB and to keep Leckhampton Lane as a rural road. We are also proposing a buffer zone on the north side to provide amenity space for residents in the Lanes Estate and a route for the Cheltenham Circular Path. Thirdly we are proposing a green corridor along the ancient hedgerows; this also provides a path between the two buffer zones.

Please give us your views on any of these proposals, either in support or disagreement, using the space on the back page or by inserting an A4 sheet inside the form. If you think there is any area that we are currently including in the proposed LGS but which could be left out, please explain which area and why.

## QUESTIONNAIRE

### How local people use and value the Leckhampton Fields are key factors in the LGS application.

1. How often over the year do you use the Leckhampton Fields and footpaths? (Please tick as applicable)

Almost daily ☐ Few times a week ☐ Many times a month ☐ Few times a month ☐  
Occasionally ☐

2. How do you use the fields (please tick all that apply; **double tick if particularly important to you**)

Walking ☐ Dog walking ☐ Running/jogging ☐ Playing games ☐ With children ☐  
Relaxing ☐ Other ☐ (please explain)

.....

3. Which areas/footpaths do you particularly use? (Please see map and tick / double tick all that apply)

Lotts Meadow ☐ Fields and footpaths between Kidnappers Lane, Farm Lane and Church Road ☐

White Cross Fields west of Farm Lane ☐ Footpath along Moorend Stream from A46 to Lotts Meadow ☐ Footpaths through the smallholdings ☐ Footpath and field by Robinswood ☐  
The circular walks ☐

4. What do you most value? (Please tick all that apply; **double tick any particularly important to you**)

Opportunity for exercise ☐ Views of Leckhampton Hill ☐ Views across the fields ☐  
Wildflowers ☐ Trees ☐ Orchards ☐ Hedgerows ☐ Rural atmosphere ☐ Variety ☐  
Tranquillity ☐ Farm animals ☐ Horses ☐ Birds ☐ Wild animals ☐ Old nurseries ☐  
Smallholdings ☐ Network of footpaths ☐ Circular walks ☐ Medieval moat ☐ Ponds ☐  
Streams ☐ Medieval cottages ☐ Wilderness areas ☐

Other ☐ (please explain)

.....

5. How important are the Leckhampton Field to you and why? (Please add personal comments)

**The effect of any development on the views from Leckhampton Hill is another key factor**

6. How important to you and to Cheltenham are the views from Leckhampton Hill across the Leckhampton Fields – the view towards the Malverns and Shropshire Hills and the view across the green belt to Wales?
7. How much do you think it would damage the views if development came closer to the Hill?

### Photographic Study of How Development on the Leckhampton Fields would affect the views from Leckhampton Hill



Photo 1 shows the view from above the main quarries north of the Observation Table. The importance of Lotts Meadow and of the field north of Lotts Meadow (bright green colour) is clear and also Robinswood Field to the left of it (hay colour). The photo shows that the hedgerow and trees at the north end of Lotts Meadow would not provide much screening for any possible development on field north of Lotts Meadow. The fields east of Farm Lane are also evident, especially the arable field at the corner of Farm Lane and Kidnappers Lane (emerald green). In front of Robinswood Field and left of Lotts Meadow is the solid mass of the tall poplars in Kidnappers Lane (all of these are covered by tree preservation orders). These help to screen the central part of nursery/orchard site in Kidnappers Lane. The buildings on the east side of this site, adjacent to Lotts Meadow, can be seen and are not significantly hidden by the hedgerow along Lotts Meadow. The west side of the nursery/orchards site is also clear but development would be softened by the hedgerow and trees in front of this. The field west of Robinswood Field is also evident, but this has not been included in the current proposed Local Green Space. It perhaps should be included or at least the south-east corner of this field to create greater visual separation from any development on the nurseries/orchard site.



Photo 2 is a wide-angle view from the same viewpoint shows the view from the same viewpoint as photo 1, but looking a little more west.





Photo 3 above is looking north-west. It shows how the west end of Brizen Lane is in line with the edge of the green belt along south-west Cheltenham and how development on the fields west of Farm Lane (White Cross Green fields) would extend right across the line of the green belt, almost to the left edge of the photograph. Behind Brizen Lane and the Lanes Estate the green fields of Brizen Farm are clear. The view shows how at present, with the fields of Brizen Farm behind, the Lanes Estate looks like a promontory rather than part of the conurbation of Cheltenham. The eye easily skips over this housing to the Brizen Farm fields beyond. This demonstrates why it is important that the Brizen Farm land is green belt but also that it is illogical not to have also included the White Cross Green land in the green belt also, as was proposed. All the White Cross Green site was considered in the JCS 2012 Landscape and Visual Sensitivity and Urban Design report to be of the highest landscape sensitivity and importance. The report recommended not building on any of this land and at most only building on the north-east of the four fields. Development just on this north-east field would lie in front of Brizen Lane as seen from Leckhampton Hill and would not cause any large extension across the green belt.



Photo 4 above is a close up showing better how Lotts Meadow, the field north of Lotts Meadow, Robinswood Field and the nurseries/orchards site would affect the view from the Hill. It shows the existing bank of trees on the nurseries/orchard site. These would help to considerably to soften and hide any development, provided they are retained. The view also shows how the large L-shaped bank of poplars in Kidnappers Lane hides the central part of the nurseries/orchards site, as noted earlier. The field west of Robinswood Field is quite apparent in this photo and is not well hidden. It is important that any development on this site will be visually separated from any development on the nurseries/orchard site. The strip of Robinswood Field between the two sites appears to be wide enough to achieve this, but any development on the Nurseries/Orchards needs to be sufficiently far from the Robinswood Field boundary and/or have sufficiently low roof height not to hide this separation.



Photo 5 above shows the view north. This view is not affected by the Leckhampton Fields apart from the fields above Collum End Rise, which are in the Area of Outstanding Natural Beauty. But the view show the effect of development coming much closer to the Hill, changing the view from one that is across countryside to one that is primarily across the Cheltenham conurbation.





Photo 6 above is the view northwest towards the Malverns from the Observation Table on Leckhampton Hill. In clearer conditions, the Shropshire Hill would also be visible to in the top right. One can see the presence of the fields east of Farm Lane in the centre left and how developing on these fields as well as developing on th northern fields beyond bring the Cheltenham conurbation much closer to the Hill. Again the nurseries/orchard site is reasonably well hidden. The importance of Lotts Meadow and Robinswood Field is also clear.





Photo 7 is the view from the Observation Table looking north-northwest. It shows the importance of Lotts Meadow, Burrows Field, the field north of Lotts Meadow and Robinswood Field.



Photo 8 is looking west-north-west from the Observation Table towards Wales. As before this view demonstrates how much development on the White Cross Green land west of Farm Lane would affect the view by protruding out across the green belt. The benefit is clear of not developing in the two southern fields and particularly in the south-west field. The view also shows the benefit of keeping the north-east corner of the site green as this creates a sort of green corridor on the right hand side of the picture from the AONB fields across the thin strip of Brizen Lane to the fields of Brizen Farm beyond and then along the edge of the green belt.



View 9 is a wide-angle view north-west from the Devils Chimney observation platform, with the Malvern Hills in the distance. The fields west of Farm Lane protrude somewhat less across the green belt because of the different angle of view. The Devils Chimney is about 100 metres south of the Observation Table.





Photo 10 is a wide-angle view north-north-west from the Devil's Chimney Observation Table. It shows the importance of the fields between Farm Lane and Kidnappers Lane and of Lotts Meadow.





Photo 11 is looking north-north-west from the Devils Chimney Observation Platform. The top of the Devils Chimney is just visible in the bottom left corner. Because this view is not wide-angle, the effect of the field north of Lotts Meadow and of Robinswood Field are more obvious. From this angle the eastern part of the nurseries/orchard site is hidden by the poplars in Kidnappers Lane, but the western side of this site is less hidden. The visual separation between the nurseries/orchard site and on the field west of Robinswood Field is more obvious from this viewing point than from the Observation Table because more of the west side of Robinswood Field is visible.



Photo 12 is a wide-angle view from the south end of Leckhampton Hill. Because of the trees in the foreground, the effect of developing on the land west of Farm Lane would be to bring the housing right up to the tree line with very little visual separation between the trees on the Hill and the housing on the land west of Farm Lane.

## **APPENDIX 5**

### **Footpaths and walks in the Leckhampton Fields**

Because of its network of footpaths, the Leckhampton Fields have many different walks. The rich diversity of landscape, hedgerows, trees, streams, ponds, many fields, small holdings, cottages, creates a excellent variety of interest and beauty that changes through the year.

### **Circular walks**

The Leckhampton Field Circular Walk has several routes, depending on the choice one makes in the network of footpaths between Kidnappers Lane and Farm Lane. All of the routes do however pass through the small holdings and Robinswood Field and it is easiest to describe them by starting from the smallholdings. The walks are described below in an anticlockwise direction, but can obviously be walked in either direction and the photographs illustrating the walks are similarly in an anticlockwise sequence.

Walking in the anticlockwise direction, there are fine views of the Hill across Robinswood Field, along Kidnappers Lane and from the fields of Church Farm. Walking in the clockwise direction there are fine views of Leckhampton Hill in Lotts Meadow and Burrows Field, fields between Kidnappers west of Kidnappers Lane.

As well as the public footpaths, there are additional paths all over Lotts Meadow, round the perimeter of Robinswood Field and round the field by the old Leckhampton Cottages (the field south of the three fields marked Horses/Grazing near the middle of the map). The Cheltenham Circular Path crosses these fields and is shown on the map by the Ordnance Survey diamond markings.

In the anticlockwise direction and starting from the small holdings, the circular walk follows round the west end of the smallholdings to Robinswood Field and from there to Kidnappers Lane. There is wide grass verge on the west side of Kidnappers Lane and the route follows this to the corner where Kidnappers Lane east. From here, there are two public footpaths, one heading west and the other south.

The long circuit takes the path west, crossing Hatherley Brook to reach Farm Lane. Here the route turns left and follows Farm Lane south past a much appreciate pig field on the left. When the route reaches the Cheltenham Circular Path, it turns left (east) across a wild field, crossing Hatherley Brook by an impressive footbridge and then turning right and going south along Hatherley Brook to Church Road. At Church Road the route turns left and follows the road until it reaches St Peter's Church. Here there is another choice to make. The longest circuit continues along Church Road until it reaches the footpath between Moorend Stream and the allotments. A slightly shorter route, turns left at St Peter's and follows the Cheltenham Circular Path northwest to Moat Cottage, where there is an intersection of four paths. Here the route turns right, past Moat Cottage on the right to reach Kidnappers Lane. It crosses Lotts Meadow to the gate at the north end from where the path follows Moorend Stream until it reaches the smallholdings again.

The slightly longer route follows Moorend Stream from the allotment, either via Lotts Meadow or through Burrows Field on the other side of Moorend Stream. There are shorter variants that cut off sections of the long circuit by heading straight back to the four-way footpath intersection at Moat Cottage. The route is clearer following the photographs and descriptions below.

One can start also these circular walks also from the car park in Burrows Field, the roads north of Burrows Field, from Church Road, from Farm Lane and from the A46 via the access track through the smallholdings or via the path along Moorend Stream which continue to the A46 (not shown on map). The Leckhampton Fields Circular Path is used by residents from all directions and further afield, including from Charlton Kings and inner Cheltenham.

### **Loop walks**

There are several loop walks round fields that are particularly used by dog walkers.

1. From Warden Hill and Shurdington Road along track through the small holdings and a loop round Robinswood Field or round Lotts Meadow.
2. Via the Cheltenham Circular Path across Farm Lane into White Cross Green, around these fields and back via the Cheltenham Circular Path.
3. From Burrows Field car park across Burrows Field and Lotts Meadow.
4. A loop around Lotts Meadow from small parking space (2 cars) where the public footpath from Moat Cottage crosses Kidnappers Lane.

### **Footpath maintenance**

Leckhampton with Warden Hill Parish Council regularly maintains all of the walks on the Leckhampton Fields, cutting back nettles, brambles, tree branches, hedges and other obstructions. Local people also maintain some of the paths of their own accord. Various local volunteers regularly pick up litter along Church Road, Kidnappers Lane and Farm Lane.

### **Views along the Leckhampton Fields Circular Path**

These photographs follow the route of the circular path as described above starting and ending in the smallholdings. The long circuit is described first that goes to Farm Lane and to Church Road. Three main routes are shown, but as noted earlier the network of footpaths makes it possible to choose a variety of circuits. All routes, however, pass along the footpath through the small holdings, and there is no doubt that this section of the path is greatly loved by many people for its charm, interest, animals and wilderness areas.

The photographs below which follow and describe the route of the path show some of its varied rural landscape. The views change with the seasons and the photographs show something of this. Most (37 out of 54) of the photographs were taken on two afternoons in December 2014 for the purpose of this submission. The loop walks on Lotts Meadow, Robinswood Field and White Cross Green are shown in separate annexes with photographs of each of these areas.





Path through the smallholdings





Path through the smallholdings. The northern smallholding are on the right.



One of the northern smallholdings along the Leckhampton Fields Circular Path



The access track to the smallholdings. This also provides access to the Leckhampton Fields and the Circular Path from Warden Hill and Shurdington Road. The northern smallholdings are on the left.



Circular Path heading south from the smallholdings into Robinswood Field



Following the west hedge of Robinswood Field



Up Kidnappers Lane to the corner where the Lane bears left and the path bears right.





At the bend the path bears right heads across the field on the other side of this fence.



To the right is a view of two of the old Leckhampton cottages.



The longer circuit heads west across the fields to Farm Lane. The land here has an unusual form of sliding gate. The top slides across and one can then walk through the V.



To the right are stables.





To the north there is a view towards Moat Cottage. The shorter version of the circular path run along the hedge on the left and goes straight to Moat cottage.



The longer circuit crosses the main tributary of Hatherley Brook and climbs back to Farm Lane. There are two fields on the map, but the boundary hedge has been removed. Both are owned by GCC and used for horse grazing.



Looking back along the path. Hatherley Brook runs along the line of trees.



The circular path follows south along Farm Lane besides a pig field. In the distance one is looking across Hatherley Brook to one of the old cottages.



Past the pig field, the Circular Path turns left following onto the Cheltenham Circular Path back to Hatherley Brook. The path runs over a pretty ungrazed field with an abundance of blackberry bushes and grasses.



From the footpath, looking south towards Leckhampton Hill.





From the footpath looking north across the field.



From the footpath, looking south with Leckhampton Court Farm on the right. This is an example of the type of recent development that has blended in well.





From the path, looking south along the line of Hatherley Brook on the left, marked by the willows.



After crossing Hatherley Brook by a sturdy footbridge, the route either continues to follow the Cheltenham Circular Path to Moat Cottage, or it turns right and follows Hatherley Brook (just visible on the right in this picture) and across the Church Farm fields to Church Road.



Shorter route following the Cheltenham Circular Path to the four-path intersection at Moat Cottage



The longer circuit path follows Hatherley Brook through Church Farm fields to Church Road. This view is looking north





Same view in winter



View from the path looking back across the Church Farm land to one of the old cottages. Moat cottage is visible in the centre by the two tall poplars.



Same view across Church Farm fields in May



View of Leckhampton Hill across the Church Farm fields.





At Church Road, the Leckhampton Fields Circular Path turns left and follow along Church Road to St Peter's Church..



This is the view the other way, west towards the Crippets junction and Leckhampton Lane. A much longer version of the walks turns left at the junction, up via the Crippets to follow the Cotswold Way National Trail to Leckhampton Hill and back down the Cheltenham Circular Path to St Peter's Church. On the right are old orchards.



Old orchard at the corner of Church Road and Farm Lane

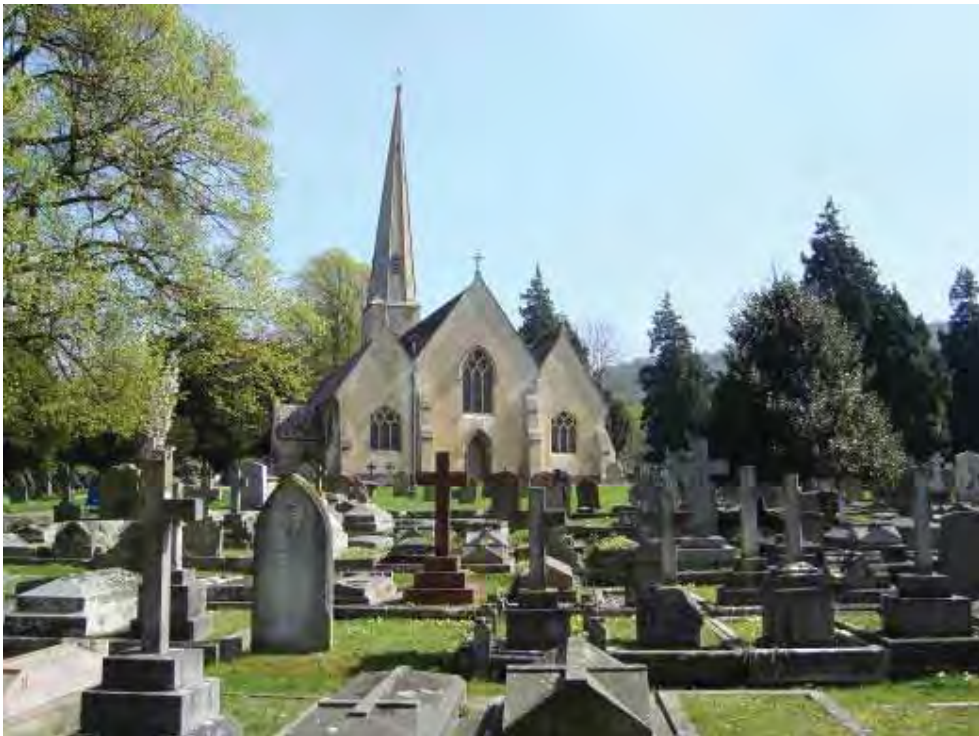


Another view in the old orchard.





Church Road by St Peter's Church. This path is part of the Cheltenham Circular Walk



St Peter's Church from Church Road.



Another view of St Peter's from Church Road



From St Peter's Church one can either continue along Church Road or follow the Cheltenham Circular Path north past the Medieval moat to Moat Cottage. Here the route turns right at the intersection of four paths and follows the shorter circuit which is described right at the end.





The longer circuit continues along Church Road past Leckhampton Manor, which dates from about 1315 and is now a Sue Ryder hospice. The fields in the foreground below the Manor are in the Cotswold AONB.



Allotments with Leckhampton Primary School in the background



Path along Moorend Stream looking south. The allotments are over the hedge on the left.



Moorend streams is the boundary between Burrows Sports ground above (looking south towards Leckhampton Hill) or through Lotts Meadow below looking north along the path with Moorend Stream on the right in the line of willows.





By either route, the Leckhampton Fields Circular Path then continue again along along Moorend Stream and back to the smallholdings. This view is looking south. The stream is to the left and the field north of Lotts Meadow is across the hedge to the right.



Path along Moorend Stream



Field north of Lotts Meadow from the Path along Moorend Stream, looking towards the nursery/orchards site





Field north of Lotts Meadow from the path along Moorend Stream, looking north towards the boundary hedge of the smallholdings.



Path along Moorend Stream by the smallholdings, looking south.



Smallholdings in snow



Northern smallholdings





The shorter version of the circular walk heads south from the bend in Kidnapper Lane to Moat Cottage.



On the way, the path passes a small pond, which is probably part of what may be a Medieval feature on the land north of Moat Cottage, shown below.



The Path passes to two old cottages





Beside Moat Cottage, four paths cross at the point the walker in red is standing. The path on the right, with two walkers is the Cheltenham Circular Path. This turns right at the intersection and goes to past the Medieval moat to St Peter's Church and then climbs up Leckhampton Hill. At St Peters the Leckhampton Fields Circular Path turns left and joins the route of the longer circuit along Church Road to the footpath along Moorend Stream.



The alternative at the four path intersection is to take the path to the left, over a stile and to the left of Moat Cottage. The path passes this field on the right and two other old cottages on the left (below) to reach Kidnappers Lane. The route crosses Kidnappers Lane, into Lotts Meadow and across the Meadow to the path along Moorend Stream and back to the smallholdings.



## APPENDIX 6 - The Smallholdings



One of the northern smallholdings



One of the northern smallholdings at the northeast corner of the land.



Smallholdings in winter.





One of the northern smallholding allotments. Much of the soil is grade 2. This is the reason that there were so many nurseries on the Leckhampton Fields until the closure of the Cheltenham market put them out of business.



Southern smallholdings taken from the footpath along Moorend Stream.



One of the northern smallholdings. There are hen, geese and ducks on the smallholdings



View across one of the southern smallholdings. The field beyond the gate is the western of the two field north of Lotts Meadow.





Southern smallholding



The access road from the A46. This is also the access route for walkers and dog walkers from Warden Hill.





Southern smallholdings



West end of southern smallholdings, with Robinswood Field and Leckhampton Hill in the background



Summer flowers in the smallholdings. The willows contribute to the great attractiveness of the southern smallholding.



Some of the southern smallholdings have become quite wild, but still have an attractive wilderness character.

## APPENDIX 7 – Robinswood Field



Walkers using the Leckhampton Circular Footpath. Robinswood is the name of the house on the left.



Perimeter path long the south side of Robinswood Field. The boundary of the nursery/orchards site is on the right.





The nurseries/orchards site from the south end of Robinswood Field in summer before the grass is cut for hay.



View of the nurseries/orchard site from the southwest corner of Robinswood Field in December.



Boundary fence on the southwest side. The boundary on the OS map is the hedge further south. It is not certain which is the actual boundary.



The perimeter path at the north end of the field.



Several perimeter paths crossing the east side of the field.



The strip of land on the south side of Robinswood. This would be important for visually separation any development on the nurseries/orchard site from any development on the field west of Robinswood Field.





Looking north along the east boundary hedge to the smallholdings in the distance.



Robinswood with Leckhampton Hill in the background. The Leckhampton Circular footpath is on the right.



The field west of Robinswood Field is actually two fields. The southern field is a hay/grass meadow; the northern field was grazed by sheep until 2014, when it seems that the tenants were probably evicted. Local people greatly missed not seeing the fields of skipping lambs in 2014.



## APPENDIX 8 - Lotts Meadow



Path between Burrow Field and Kidnappers Lane



Pond at the north end of Lotts Meadow, which forms when the water table is high in winter and wet periods in summer.





The lines of willow along the east side of Lotts Meadow. Moorend stream flows through the willows on the right.



Looking south across Lotts Meadow towards Leckhampton Hill.



View from the north corner of Lotts Meadow in winter.



Lotts Meadow is heavily used by walkers dog walkers.



Winter scene with the poplars in Kidnappers Lane in the background.



Hedgerows and trees separating Lotts Meadow from the nursery/orchards site.





Lotts meadow is lightly grazed by cattle



Same view in Autumn



Like many Leckhampton fields, Lotts Meadow is buttercups brilliant in May

#### **APPENDIX 9 – White Cross Green Fields**



From southeast corner, with Farm Lane to the right.





Leckhampton Hill from White Cross Green Fields



One of the ancient hedgerows, which are also a haven for wildlife.





The edge of the Brizen Lane and the Lanes Estate from the north west edge of the fields.



Fields viewed from the north west corner. The west side of the site is the flood plain of the Warden Hill tributary of Hatherley Brook. This tributary was largely responsible for the devastating flooding of Warden Hill in July 2007.



Showing how resident in Brizen Lane currently have direct access from their properties onto the White Cross Green site.



Showing the hedgerows in summer



Fields in buttercups



LECKHAMPTON GREEN FIELDS  
THEIR IMPORTANCE FOR BIRDS OF CONSERVATION CONCERN  
by Tony Meredith

My wife and I have now reached our 20th year in regularly monitoring the wild bird population of the Green Fields between Leckhampton Village and the Shurdington Road. As shown on the attached map, the area covered lies between Farm Lane on the west and Merlin Way/Moorend Grove/Leckhampton School on the east. Also shown is the regular route of our monthly bird survey over public footpaths and trackways which conveniently enable quite extensive coverage with the aid of binoculars.

The attached species' checklist shows the last 10 years in terms of Quarterly Summaries derived from the monthly surveys.

It also shows the birds grouped into 3 Categories. The first and largest contains 35 species resident all-year-round, the second shows 6 migrant species arriving in the Summer for nesting and breeding on site, whilst the third has 5 Winter migrants which are regularly seen resting and feeding in the site's fields and hedgerows. The third category includes 3 Gull species which are not strictly migrants but they tend to move inland in winter from their summer coastal estuaries and rivers, particularly where sportsfields provide easy pickings.

The species are listed using standard English names and in the family sequence (K.H.Voos) adopted in the Collins Guidebooks. The second column of the checklist shows which of the species are of Conservation Concern as published in the most recent update of "Birds of Conservation Concern" (No 3 issued 2009). That document's text and classification lists are the result of consultation between the British Trust for Ornithology (BTO), RSPB, WWT, Natural England, Countryside Commission for Wales, Northern Ireland Environment Agency, Scottish Natural Heritage etc.

The conclusions to be drawn from the checklist are, we believe, as follows:-

i) The Green Fields and their tree-lined hedgerows are particularly valuable for Red-listed Song Thrush, of which there are several very visible and audible residents on site.

ii) Amber-listed Mistle Thrush is another species whose numbers are nationally in decline but whose continuing all-year presence in this area is assisted by the ancient fruiting hedges and trees which provide sources for mistletoe, fruits and insect food.

iii) Green Woodpecker is another Amber-listed bird whose presence is a notable feature of the area. Sadly its diminutive cousin the Red-listed Lesser-spotted Woodpecker, now in dramatic national decline, has been seen less here also. It was last reliably seen here in late 2007 and early 2008 but the removal of the species' favourite habitat of old apple orchards off Kidnappers Lane and in the Smallholdings close to Shurdington Road means it is unlikely to reappear.

iv) Summer visitor Swallows and House-martins (both Amber-listed) are frequently seen over the pond in Lotts Meadow. At low sun the rectangular outline of shallow grass bank suggests the pond may once have been the Manorial Fishpond of the earlier moated Manor-House. It is used not only as drinking water by these Summer species but also as a source of mud for nest building.

v) The reduction in sightings of Kestrel in the area has been offset by increased views of Sparrowhawk. The increase in heavier rainfall leading to ground saturation and more frequent flooding may well have reduced the population of small rodents in the Green Fields thereby causing the Kestrels to move away. In contrast the Sparrowhawks have plenty of avian species to feed upon. To this extent the regular sighting of Sparrowhawks is a good indicator of the value of this area for so many wildbird species.

We feel there is clear evidence that Leckhampton Green Fields provide a really worthwhile opportunity for people to appreciate a wide spectrum of British Wildbirds. Its value as a regular confirmed habitat for more than 45 species, of which 17 are either Red or Amber-listed is testament to its importance. This is not simply a green space in a crowded environment but is also a location where meaningful nature studies are possible. We owe it to future generations as well as to increasingly marginalised wildbirds to see that it is preserved and protected.





QUARTERLY TICK-SHEET (FROM MONTHLY SURVEYS)  
N.B. NO SURVEYS IN FIRST QTR OF 2013 OR SECOND QTR 2012

SPECIES	LISTED	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
RESIDENT ALL-YEAR SPECIES ↓	BUZZARD		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	SPARROWHAWK		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	KESTREL	AMBER	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	PHEASANT		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	STOCK DOVE	AMBER	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	WOOD PIGEON		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	COLLARED DOVE		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	LITTLE OWL		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	GREEN WOODPECKER	AMBER	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	LESSER SPOTTED WOODPECKER		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	LESSER SPOTTED WOODPECKER	RED				✓	✓	✓	✓	✓	✓	✓
	PIED WAGTAIL		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	DUNNOCK	AMBER	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	ROBIN		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	MISTLE THRUSH	AMBER	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	SONG THRUSH	RED	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	BLACKBIRD		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	BLACKCAP		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	GOLDCREST		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	WREN		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	WENT TIT		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	COAL TIT		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	BLUE TIT		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	LONG-TAILED TIT		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	TREECREEPER		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	MAGPIE		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	JAY		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	JACKDAW		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	CARRION CROW		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	STARLING	RED	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	HOUSE SPARROW	RED	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	CHAFFINCH		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	GOLDFINCH		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	GREENFINCH		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	BULLFINCH	AMBER	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SUMMER VISITOR SPECIES ↓	SWIFT		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	SWALLOW	AMBER	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	HOUSE MARTIN	AMBER	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	WHITETHROAT	AMBER	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	LESSER WHITETHROAT		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
WINTER VISITOR SPECIES ↓	CHIFFCHAFF		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	BLACK-HEADED GULL	AMBER	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	COMMON GULL	AMBER	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	LESSER BLACKBACK	AMBER	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	REDWING	RED	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
	FIELDFARE	RED	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

# Rise of the blue tit

## Numbers soar as blackbird and robin populations dive

By Ben Spencer  
Science Reporter

THE brightly coloured blue tit is known as a friendly and adaptable bird, always happy to pay a visit to a thoughtfully placed garden feeder or nesting box.

And according to a survey, the species is now second on the RSPB's list of most-spotted garden birds – its highest position since the poll began in 1979.

The Big Garden Birdwatch has revealed that the distinctive bird, loved for its acrobatic feeding habits, is now seen in three out of every four gardens.

Experts believe its rise is partly due to the boom in garden feeders and nesting boxes, which allow blue tits to survive the winter.

Daniel Hayhow, conservation scientist at the RSPB, said: 'Blue tits are increasing nationally, and we think it is down to the increasing food in the garden. They also benefit from bird boxes.'

Blue tits are most prevalent in urban and suburban areas. They are not shy about coming to gardens, and will feed on most food types that we put out.

That means they are perhaps better able to survive winters.

Sparrows remain the most common birds in British gardens despite their numbers dropping by nearly two-thirds over the last 25 years. Last year's second most popular species, blackbirds, have dropped to fourth on the list, while



### TOP 20 GARDEN BIRDS

	Last year's position	% change since 1979		Last year's position	% change since 1979
1: House sparrow	(1)	-62.1	12: Dunnock	(12)	1.6
2: Blue tit	(3)	0.7	13: Long-tailed tit	(10)	n/a
3: Starling	(4)	-84.2	14: Feral pigeon	(15)	n/a
4: Blackbird	(2)	-45.8	15: Greenfinch	(16)	n/a
5: Woodpigeon	(5)	742.3	16: Jackdaw	(17)	-44.4
6: Chaffinch	(6)	-50.1	17: Coal tit	(14)	n/a
7: Goldfinch	(8)	n/a	18: Carrion crow	(18)	181.8
8: Great tit	(7)	39	19: Wren	(20)	n/a
9: Collared dove	(11)	215.1	20: Great spotted woodpecker	(25)	11.4
10: Robin	(9)	-45.1			
11: Magpie	(13)	129.6			

Source: RSPB's Big Garden Birdwatch

goldfinches have climbed another place since last year, and now perch at number seven.

The robin, which has been as high as number seven in the past decade, has dropped back to tenth place. And there has been a new entry to the top 20 – for the first time ever the great spotted woodpecker squeezed in at number 20.

However experts said they were still concerned by the decline of some of the species.

Numbers of starlings and song thrushes have dropped by an alarming 84 and 81 per cent respec-

tively since Birdwatch began its survey 25 years ago. Both are on the UK 'red list' – meaning they are of the highest conservation concern.

There is slightly better news for the house sparrow, as its decline has slowed and it remains the most commonly seen bird in British gardens. However, it remains on the red list as numbers have dropped by 62 per cent since 1979.

Richard Bashford, Big Garden Birdwatch organiser, said: 'The winter has been so mild, and we wondered if it would have a significant impact on garden birds. They

were out in the wider countryside finding natural food instead of taking up our hospitality.'

'But the good news is that this may mean we have more birds in our gardens in the coming breeding season because more survived the mild winter.'

Martin Harper, RSPB conservation director, added: 'Many garden birds rely on us humans for help.'

'Blue tits are adaptable garden birds. If we put up a nest box, leave out some food or let our gardens grow a bit wild they'll be among the first to take advantage.'



Mrs A Winstone  
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Up Hatherley  
Cheltenham GL51 3TP

Cllr Adrian Mears  
Chair, Leckhampton with Warden Hill Parish Council  
21 Collum End Rise  
Leckhampton  
Cheltenham GL53 0PA

24 January 2015

### Local Green Space at Leckhampton

I would like to very strongly support a designation of Local Green Space at Leckhampton. These fields are very special to my family and this letter incorporates our response to the Parish Council public consultation questions. I would like the Parish and Borough councils to consider carefully which areas to be designated since I am a particular fan of the northern fields and smallholdings and the open view of Leckhampton Hill and AONB they provide to residents and visitors alike from the A46 Shurdington Road.

As the author of the original 2009 Liberal Democrat policy for 'a special designation comparable to SSSI to allow the protection of allotments and other green spaces of particular value to the health and wellbeing of local people'<sup>1</sup>, I can say that the Leckhampton green fields are exactly the kind of local green space the policy is intended to protect: where repeated public campaigns and costly and time-consuming planning applications, local plan development processes and inspections have continually reaffirmed its value to local people and rejected development but where developers nevertheless launch relentless attacks on it.

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<sup>1</sup> Liberal Democrat Policy Paper 93 *Our Natural Heritage*, published and passed by Autumn Conference 2009.



The lack of a designation simply for the intrinsic value of green spaces to local people was a major loophole in planning law and regulation which otherwise protected areas only of scientific interest or outstanding natural beauty or which contributed to specific Green Belt functions. The green fields at Leckhampton do not qualify under any previous designation yet for the communities around them they provide accessible and enjoyable rights of way for free exercise and recreation which we know is good for our mental and physical health, absorption of CO<sub>2</sub> and particulate pollution, habitats for wildlife including bats and deer, local food, tranquillity and simple enjoyment with beautiful views of the Cotswold escarpment and a sense of the countryside for urban children in particular.

The Local Green Space policy was subsequently incorporated into the Liberal Democrat manifesto<sup>2</sup> and then the Coalition Programme for Government<sup>3</sup> - both of which again referenced the intended comparability with SSSIs – and then the government's natural environment white paper<sup>4</sup> and finally the National Planning Policy Framework<sup>5</sup>. In the famous footnote 9 to the NPPF's central statement on sustainable development, the NPPF specifically identifies the LGS as one of those designations, also including SSSIs, Green Belt, AONB and National Parks, which can specifically be used to qualify that policy and protect areas against development. The Leckhampton fields' allocation for development in any draft plan should not therefore override the proper consideration of it as a Local Green Space during the plan-making process.

It is no exaggeration to say that the Local Green Space policy was designed with the protection of the Leckhampton fields in mind and a designation here could provide a national case study in the use of the new policy.

I would like to congratulate Leckhampton with Warden Hill Parish Council on its early use of the policy in 2013 and Cheltenham Borough Council for taking such a pro-active approach to designating local areas within its next Local Plan. It is a disgrace that the local Joint Core Strategy process has intentionally ignored the designation and the Leckhampton application (and good grounds for its rejection as unsound but I hope this consultation and the Cheltenham Borough Council assessment will produce substantial new evidence that Leckhampton's fields should be protected and that, even at this late stage, this will be recognised in the Joint Core Strategy.

I have answered the Parish Council's specific questions below, as well as adding some more detailed thoughts on the Leckhampton fields and specifically on the definition of 'extensive' in the context both of the LGS policy and the local area.

Thank you again for taking such a strong lead on Local Green Space policy.

Yours sincerely

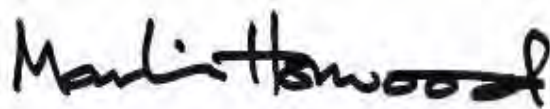
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<sup>2</sup> Liberal Democrat Manifesto 2010, p82: 'Create a new designation – similar to Site of Special Scientific Interest status – to protect green areas of particular importance or value to the community.'

<sup>3</sup> The Coalition: our programme for government, HMG May 2010, p11: 'We will maintain the Green Belt, Sites of Special Scientific Interest (SSSIs) and other environmental protections, and create a new designation – similar to SSSIs – to protect green areas of particular importance to local communities.'

<sup>4</sup> The Natural Choice: securing the value of nature, HMG 2011, p49, para 4.23

<sup>5</sup> National Planning Policy Framework paragraphs 76-78, pp18-19, and footnote 9, p4



Martin Horwood MP  
Member of Parliament for Cheltenham

cc: Erin Tattersall, GRCC  
Cllr Steve Jordan, Leader, Cheltenham Borough Council  
Tracey Crews, Head of Planning, Cheltenham Borough Council

Submission to consultation on the Leckhampton Fields Local Green Space designation  
January 2015

#### Supporting document

- A. Answers to specific Leckhampton consultation questions
- B. Are the Leckhampton Fields an 'extensive' tract of land?
- C. Policy arguments in favour of protecting the Leckhampton Fields as Local Green Space
  - 1. Designation would be consistent with the current valid Local Plan
  - 2. Designation would not contradict the emerging Joint Core Strategy, in which the inclusion of this land at Leckhampton is extremely contentious and to which there are many significant unresolved objections.
  - 3. Designation is consistent with the emerging Neighbourhood Plan as described in the concept drafted by Leckhampton with Warden Hill Parish Council
  - 4. Designation is consistent with the National Planning Policy Framework

**A. Answers to specific Leckhampton consultation questions** (on behalf of myself and four other members of my family)

1. How often over the year do you use the Leckhampton Fields and footpaths?  
Today: ☒ Occasionally  
In the past: ☒ Many times a month
2. How do you use the fields?  
Today: ☒ Walking ☒ With children + ☒ Views to & from the escarpment  
In the past: ☒ Walking ☒ Dog walking + ☒ Views to & from the escarpment



*Grandmother & grandson watching the pigs in 2006: possibly the greatest value of the Leckhampton Fields are their accessibility on foot to young and old, very different to the very steep Cotswold scarp nearby.*

3. Which areas/footpaths do you particularly use?  
☒ Footpaths through the small holdings  
☒ Fields and footpaths between Kidnappers' Lane, Farm Lane and Church Road  
☒ Footpath and field by Robinswood
4. What do you most value?  
☒ ☒ Farm animals  
☒ ☒ Network of footpaths  
☒ ☒ Views of Leckhampton Hill  
☒ Trees  
☒ Orchards  
☒ Hedgerows  
☒ Rural atmosphere  
☒ Tranquility  
☒ Smallholdings



☒ Medieval cottages

5. How important are the Leckhampton Fields to you and why?



*My family and then Leglag chair Kit Brauholtz with then Mayor and Leckhampton councillor Robin MacDonald, christening a bench dedicated to my father Don Horwood, a co-founder of Leglag and one of those who had campaigned to save the Leckhampton fields for the community since the 1980s.*

The Leckhampton Fields have been enormously important to me and generations of my family for decades. My parents moved to Leckhampton from St Mark's in the 1960s and always valued the views and accessible countryside they provided. Our traditional outing to walk off Christmas day lunch was a family excursion through the Leckhampton Fields and up the Crippetts beyond. I grew up watching the pigs and walking the family dog regularly through the lanes and smallholdings at Robinswood. I think it's wonderful that we still have that farmland, smallholdings and nurseries despite the planning blight, consequent short leases and underinvestment that have afflicted them for years. Clear protection would offer the chance of a really well-planned area of local food production from which children could learn the real origin of food is not a supermarket shelf. I've now taken my children to meet the pigs hundreds of times and taken them on walks and even bat-finding.



*Sami with bat detector before ecologist Dr Elizabeth Pimley's bat walk through the Leckhampton Fields and hedgerows in 2013*

Since being elected as Cheltenham's MP in 2010 I have campaigned consistently for their protection – and I have found cross-party consensus in favour of their protection amongst all my parliamentary opponents in three elections, and amongst all Leckhampton's other elected representatives at parish, borough and county level. Along with those other elected representatives, I have had overwhelming support from local people for the protection of these fields, evidenced by thousands of letters, participants in protest meeting and walks, emails, tweets, petition signatures and votes over decades. I cannot imagine any green spaces more demonstrably special to their local community



*Local people walking in support of the Leckhampton Fields in 2012*





*Taking the battle to parliament in 2009*

6. How important to you and to Cheltenham are the views from Leckhampton Hill across the Leckhampton Fields – the view towards the Malverns and Shropshire and the view across the green belt to Wales?



*Views across Leckhampton from the top of Leckhampton Hill in different weather– the Leckhampton fields are even more prominent from lower down the hill.*



The encroachment of the conurbations of Cheltenham and Gloucester onto the Vale countryside visible from Leckhampton Hill is almost complete with the town and city almost joining and more open countryside too far away to be important to the view. The nearby Leckhampton fields are immediately and prominently visible from the escarpment and are the most obvious example of open fields in view on the flood plain below the slopes of the hill itself.

7. How much do you think it would damage the views if development came closer to the hill?

The loss of the Leckhampton Fields to development would leave a sad picture of urban sprawl from Leckhampton Hill, thereby contradicting the adopted Cotswolds AONB management plan 2013-18 which asks local authorities to protect the setting of the AONB.<sup>6</sup>

**B. Are the Leckhampton Fields an 'extensive' tract of land?**

It has been suggested that the land at Leckhampton is too 'extensive' to be considered for LGS status. This is categorically wrong.

The NPPF guidance makes clear **"there are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgement will inevitably be needed"**.

The original Liberal Democrat policy and the Coalition Agreement (see cover letter) compared the LGS deliberately to SSSIs while the guidance says that it should not used to create "a new area of Green Belt by another name".

Green belts are clearly 'extensive tracts of land'. SSSIs and LGS are not.

The following size comparisons make it quite clear that areas comparable to or larger than the Leckhampton LGS application area have frequently been protected in the local context as parks or SSSIs and that its area is not remotely comparable to those of Green Belts, which are genuinely extensive tracts of land:

**Leckhampton 2013 LGS application area**                      56 hectares

**Nearest SSSI at Crickley Hill & Barrow Wake**                      55 hectares

Smallest in England is Sylvan House Barn, Glos at 50m<sup>2</sup>/0.005ha; median & mean c 20ha

**Famous protected green spaces in Greater London:**

Hyde Park	142 hectares
Clapham Common	89 hectares
Kensington Gardens	111hectares
Green Park/St.James's Park	70 hectares

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<sup>6</sup> <http://www.cotswoldsaonb.org.uk/userfiles/file/management-plan-review/final/management-plan-2013-18-adopted-pre-publication.pdf>

Hampstead Heath	320 hectares
<b>Other local protected green spaces:</b>	
Pittville Park	33 hectares
Lineover Wood	50 hectares
Dowdeswell Wood	82 hectares
<b>Green Belts:</b>	
Cheltenham & Gloucester (the smallest in the country)	6,694 hectares
Average for England	114,286 hectares

Green Belts are genuinely extensive and an order of magnitude larger than SSSIs which are several tens of hectares are exactly comparable with the LGS requested in Leckhampton.

## C. Policy arguments in favour of protecting the Leckhampton Fields as Local Green Space

### 1. Designation would be consistent with the current valid Local Plan

The **Cheltenham Local Plan (2nd review 2006)** is still valid and is relevant to all current planning decisions. This was reinforced at planning appeal as recently as September last year (Appeal Ref: APP/B1605/A/13/2199178).

The **National Planning Policy Framework** is absolutely clear that it aims to ‘strengthen local decision making’ (paragraph 208). It specifies that the planning system must be ‘plan-led’ (paragraph 196) and that ‘**for the purposes of decision-taking, the policies in the Local Plan (and the London Plan) should not be considered out-of-date simply because they were adopted prior to the publication of this Framework**’ (paragraph 211). Specifically it says that after March 2013 ‘due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework’ (paragraph 216). As set out later, the protection of the land at Leckhampton is entirely consistent with the core planning principles and key elements of the NPPF relating to sustainability, the empowerment of local people, protecting the countryside and recognising its ‘intrinsic character’, conserving the natural environment and prioritising the use of previously developed (brownfield) land.

The Local Plan sets out the challenge for councillors considering applications on the urban fringe:

'Cheltenham owes much to its setting at the foot of the Cotswold escarpment. The town's eastern fringes include the high quality scenery of the escarpment, with landscape and woodlands that are amongst the most attractive in the English countryside...

About 38% of the Borough is countryside. It accommodates the activities of agriculture, forestry and recreation as well as providing habitats for a diversity of wildlife... **The countryside is also under continued pressure from developers, especially for residential development, which threatens to erode its character. These problems are most acute on the urban fringes.'**

*Cheltenham Borough Local Plan second review, July 2006, paragraphs 7.1 & 7.2*

The Plan then specifically addresses the 'unallocated land' at Leckhampton:

## UNALLOCATED LAND AT LECKHAMPTON

7.40 Land at Leckhampton has been the subject of development pressure for a number of years. The Inspector considering objections into the Second Review of Cheltenham Borough Local Plan concluded that, "development of the objection site would materially harm the rural character and appearance of the area, and the important contribution that this makes to the landscape within the site and when seen from the AONB."

**7.41 The Council supports the Inspector's conclusions and considers that the intrinsic value of the land should be protected as a resource for its recreational, landscape, wildlife and archaeological interest.** Any proposals for development within this area will be considered against policies CO 1 (landscape character) and CP3 (sustainable environment).

7.42 In the consideration of growth, land at Leckhampton together with all potential development sites across the Borough will be reassessed within the context of the Regional Spatial Strategy for the South West to inform Cheltenham's emerging Local Development Framework. This will require cross boundary working with Tewkesbury Borough Council and relevant communities.

Protection would also be consistent with the following specific Local Plan policies:

- **Policy CP 1: Sustainable development** (objectives O6 and O7)

Development will be permitted only where it takes adequate account of the principles of sustainable development (note 1). In particular, development should:

- (a) conserve or enhance natural resources and environmental assets; and
- (b) give priority to the use of previously developed land (notes 2 and 3); and
- (c) make the most efficient and effective use of land (note 3).

Note 1 to this policy says that 'each of the principles of sustainable development set out in table 2 may be taken into account as a material consideration in the determination of planning applications.' Table 2 sets out the principles of sustainable development and includes the following relevant to Leckhampton:

- protecting sites of archaeological and historic interest and their settings
- conserving green space and trees
- safeguarding attractive landscape



- protecting and creating wildlife habitats
  - protecting the quality of water, land and air
  - minimising the risk of flooding
  - reducing gases causing climate change
  - using brownfield land before Greenfield
  - ensuring that specific groups of the population are not disadvantaged by development
  - protecting and improving personal and community health
  - promoting and enhancing quality of life
- **Policy CP 3: Sustainable environment** (objectives O9, O11, O12, O16, O18 and O30)

Development will be permitted only where it would:

- (a) not harm the setting of Cheltenham (note 1), including views into or out of areas of acknowledged importance (note 2); and
- (b) not harm landscape character (note 3); and
- (c) conserve or enhance the best (note 4) of the built and natural environments; and
- (d) safeguard and promote biodiversity (note 5); and
- (e) not give rise to harmful levels of pollution (note 6) to land, air or water (surface or ground); and
- (f) minimise the risk of flooding (note 7).

\* This is one of the policies which the Local Plan explicitly states does apply to Leckhampton (see above).

Notes 1 and 3 refer explicitly to the Cotswolds AONB and Note 1 explains that the 'Setting' of Cheltenham is defined as those features which create the distinctive sense of place for the Borough, including the Cotswold escarpment and its green spaces – which are directly relevant to the Leckhampton site which is directly under the Cotswold escarpment and adjacent to and visible from the AONB at Leckhampton Hill.

Note 4 to this policy explains that conserving or enhancing the 'best' of the natural environment means conserving or enhancing features which make a significant contribution to the character, appearance, amenity or conservation of a site or locality. The character and quality of the land at Leckhampton has been repeatedly referenced by planning inspectors.

In 1993 **Inspector Brian Dodds** ruled that 'the land at Leckhampton should be protected for its special historical, landscape and amenity value'.

In 2003 **Inspector Mary Travers**, conducting an enquiry into an earlier plan to develop the same land, reported that the area had 'a gently rolling, topography and an attractive pastoral character that in my view links strongly into the landscape of the AONB.. it is apparent that development would entail a significant intrusion into views of the open countryside and the AONB from the existing edge of the built-up area.. its visual impact on the surrounding countryside would be very significant and that it could not be easily mitigated."

Even by the recent Amec review commissioned for the JCS team waxed lyrical about the area:

'Located between the A46 Shurdington Road and the Cotswold AONB, this land forms part of the countryside which separates Cheltenham and Gloucester.

The landform is gently undulating at around 70-80m AOD and land use is mainly pasture. Whilst woodland cover is limited, there is a large network of hedgerows, most of which are very well maintained at a variety of heights with occasional trees. This creates various levels of enclosure, giving an impression of a well-wooded landscape in flatter area. There is a very prominent landform and field pattern to the south adjacent to the AONB which is vulnerable to change and is considered to be a valuable landscape resource. Only a small area has limited intrinsic landscape value where previous character has already been lost.

There are key views from national trail/public rights of way within the AONB to the south of the area from Hartley Hill and Shurdington Hill. The area displays unusual land use patterns with many small holdings, orchards and allotment/market gardens with a good brookline and associated tree cover. The area displays a mosaic of habitat types with good connections to the east, south and west.'

- **Policy CP 4 *Safe and sustainable living*** (objectives O3, O4, O16, O23 and O32)

**Development will be permitted only where it would:**

- (a) not cause unacceptable harm to the amenity of adjoining land users and the locality (notes 1- 4); and**
- (b) not result in levels of traffic to and from the site attaining an environmentally unacceptable level; and**
- (c) make adequate provision for security and the prevention of crime and disorder (note 5); and (d) not, by nature of its size, location, layout or design, give rise to crime or the significant fear of crime or endanger public safety; and**
- (e) maintain the vitality and viability of the town centre and district and local shopping facilities.**

Leckhampton's fields have a unique network of public rights of way close to an urban population which give access to an area of rural and agricultural character on reasonably flat and accessible land. The steep Cotswold escarpment and AONB nearby have many wonderful qualities but accessibility is not one of them, even for those with modest mobility issues (including toddlers and young children as well as older residents). Nor does much of the farmland in the adjacent Green Belt further outside Cheltenham provide anything like the same levels of access with far fewer public rights of way, since they do not share the legacy of Leckhampton's village history. Even if development preserved most of the public rights of way, they would no longer provide free access to green space in the same way, thereby removing an amenity which is proven to reduce health inequalities.



*The site's unique close network of public rights of way on reasonably level, accessible green land provides an important amenity to an urban population – in contrast to Green Belt farmland further outside Cheltenham or the steep escarpment within the AONB.*

- **Policy CP 7 Design** (objective O2)

**Development will only be permitted where it:**

- (a) is of a high standard of architectural design; and**
- (b) adequately reflects principles of urban design; and**
- (c) complements and respects neighbouring development and the character of the locality and/or landscape (note 3).**

**Extensions or alterations of existing buildings will be required to avoid:**

- (d) causing harm to the architectural integrity of the building or group of buildings; and**
- (e) the unacceptable erosion of open space around the existing building.**

LGS designation here would strongly reinforce part e) of this policy.

- **Policy GE 2 Private green space** (objectives O12 and O18)

**The development of private green areas, open spaces and gardens which make a significant townscape and environmental contribution to the town will not be permitted.**

Note 3 explains that 'In determining whether a green space has a significant townscape and environmental value, the Council will have regard, among other factors, to its contribution to the following:

- (a) the spacious character of the town;
- (b) the quality of the local townscape;
- (c) the established character of the locality;
- (d) the setting of an important building or group of buildings;
- (e) important landmarks, views and vistas within and out of Cheltenham;



This list of considerations is not intended to be exclusive.'

The Leckhampton site qualifies on many of these grounds, especially a) c) d) and e). It provides a green landscape within the urban area which also provides a setting for views of Leckhampton Hill from the town. The wider site contains an important ancient historical site and the development would remove an important sense of space in the locality which currently benefits residents of Hatherley and Warden Hill, the Lanes and Leckhampton itself. Development here would contribute to the growing sense of continuous urban sprawl.



*The extraordinarily open view of Leckhampton Hill from the A46 Shurdington Road within urban Cheltenham (the Lanes and housing around Kidnappers Lane are immediately to the right, Warden Hill is behind the camera and Cheltenham's central built-up area begins just to the left). Development on the northern fields of Leckhampton would lose this view and in my view contravene Local Plan policies CP3, GE2and CO1.*

- **Policy GE 6 Trees and development (objective O12)**

**Development which would cause permanent damage to trees of high value (note 1) will not be permitted. The following may be required in conjunction with development:**  
**(a) the retention of existing trees; and**  
**(b) the planting of new trees (note 3); and**  
**(c) measures adequate to ensure the protection of trees during construction works.**

Note 1 explains that 'High value' does not mean some exceptional or rare tree but any sound and healthy tree with at least 10 years of life remaining which makes a significant contribution to the character or appearance of a site or locality. There are many trees in the site that would meet this criterion (see photo and aerial view on previous page).



- **Policy CO 1 *Landscape character*** (objectives O9, O10 and O12)

**Development will only be permitted where it would not harm:**

**(a) attributes (note 1) and features (note 2) which make a significant contribution to the character, distinctiveness, quality and amenity value of the landscape; and  
(b) the visual amenity of the landscape.**

★ This is another policy which the Local Plan explicitly states does apply to Leckhampton (see above).

Note 1 explains that ‘attributes’ of the landscape are defined as being the inherent characteristics of the locality, including openness or enclosure, key views or vistas, topography, and patterns in the landscape such as those defined by historic land uses, roads and lanes, buildings, hedgerows or water courses. Note 2 explains that ‘Features’ include those constituent parts of the landscape that either in their own right, or in combination with landscape attributes, give the locality its particular character and distinctiveness, including for example, trees, hedges, geological or geomorphological features, rights of way, watercourses, ponds and buildings as well as other structures.

This distinctive overall ‘rural character’ of the land at Leckhampton is clear to see in the area itself and has been repeatedly referenced over the years by inspectors at appeal, by the AMEC review, by the Parish Council concept for the LGS designation and, of course, in the Local Plan itself as detailed at the outset of this section.

2. **Designation would not contradict the emerging Joint Core Strategy, in which the inclusion of this land at Leckhampton is extremely contentious and to which there are many significant unresolved objections.**

Paragraph 216 of the **National Planning Policy Framework** is clear that ‘decision-takers *may* also give weight’ to emerging plans – in our case the Joint Core Strategy (JCS) that will also determine many aspects of the new Cheltenham Local Plan. Three factors are then listed as relevant:

- The stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given)
- **The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and**
- The degree of consistency of the relevant policies in the merging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

The latest draft of the JCS does include development of an urban extension covering the land at Leckhampton but this is hugely contentious and it is quite possible that if even some of a number of factors influence later versions of the JCS that the allocation envisaged at Leckhampton may be sharply reduced or even removed altogether:

- This LGS designation exercise and the emerging Leckhampton Neighbourhood Plan
- Changes to the JCS housing model to refocus on environmental and social factors not just economic ones, leading to reduced growth rate in housing for inward migration;
- Reduced absolute numbers through more accurate and appropriate modelling, eg ONS spring 2014 figures
- Reduced absolute numbers on the basis that the projected numbers cannot be met sustainably
- Rebalancing towards more dispersed development not urban extensions
- Rebalancing of allocations between Cheltenham and other areas. Cheltenham's projected need in the JCS documents is actually 10,000 not the 10,849 actually allocated. This adjustment alone could remove most of the allocation at Leckhampton.
- Addition to the JCS plan, if necessary, of well-planned new settlements instead of urban extensions, for instance at Sharpness, Highnam or elsewhere.

All of these are being argued for by various submissions to the JCS.

Opposition to the inclusion in the JCS of development at Leckhampton is being argued by:

- Both myself as MP and my principal prospective parliamentary opponent who, between us, are likely to command some 90% of the popular vote at the next General Election (just as the Conservative candidate and I did at the last)
- All elected representatives of the area at District and County level
- Leckhampton with Warden Hill Parish Council
- The Cheltenham Chamber of Commerce which favours development north-west of Cheltenham but wants the southern urban extension ruled out
- The Leckhampton Green Land Action Group which has recruited more than 1,000 local members over the years specifically to protect this land
- Almost every correspondent commenting on the plan in local media such as the Gloucestershire Echo
- Very large number of objections already made to this application and to the inclusion of Leckhampton in the JCS in the recent consultation.

Objections are being made on grounds of:

- Sustainability, including errors in the Sustainability Appraisal process
- The opportunity for the Leckhampton to be designated a Local Green Space
- Loss of amenity, especially to multiple rights of way for less mobile residents such as the very young, elderly and disabled who cannot access more challenging landscapes such as the AONB itself
- Compromising the setting of the AONB
- Health and free recreational value lost and impact on health inequalities
- Negative impact on local traffic congestion and air quality
- Flood risk, particularly to Warden Hill immediately downhill of the site
- Lack of infrastructure
- Climate change impact
- Economic impact of loss of ecosystem services and attractive setting for Cheltenham

In summary there are substantial, widely-shared and unresolved objections to the extremely controversial inclusion of Leckhampton in the latest version of the JCS. These clearly meet the



condition in paragraph 216 of the National Planning Policy Framework and so this element of the emerging JCS should not be accorded significant weight.

And, of course, the JCS still has to be reviewed in an examination in public by the planning inspectorate, during all of which the inclusion, exclusion or reduction of the controversial urban extension at Leckhampton will be a major issue.

It would be quite wrong and against the instructions of the National Planning Policy Framework for this process to be plan-led and empowering of local communities to pre-judge the outcome of the remaining stages of the JCS process by restricting the protection of the Leckhampton Fields and conceding the inclusion of the urban extension at Leckhampton.

### **3. Designation is consistent with the emerging Neighbourhood Plan as described in the concept drafted by Leckhampton with Warden Hill Parish Council**

Some 600 Neighbourhood Plans are being brought forward in communities nationwide but the concept plan published by Leckhampton with Warden Hill Parish Council in May 2013 represents the only emerging Neighbourhood Plan in the Cheltenham area.

Neighbourhood planning is a key part of the government's planning reforms and was introduced through the [Localism Act 2011](#), the legislation coming into effect in April 2012. The intent was to hand power down not just to large district councils but also to smaller communities and neighbourhoods and would make the views of local communities material to planning decisions, for instance over 'where new homes and offices should be built' (DCLG website).

Paragraph 183 of the National Planning Policy Framework says that 'Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need'. Neighbourhood plans must be in conformity with the JCS and so if the JCS does include large-scale development in a particular location, a Neighbourhood Plan cannot overturn that. But an emerging Neighbourhood Plan should obviously influence the emerging JCS. The first core planning principle of the National Planning Policy Framework (paragraph 17) is that 'Planning should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area'.

Planning processes – including this one - should therefore give weight to emerging Neighbourhood Plans.

The concept plan published by the Parish Council in May 2013 is of exceptionally high quality with detailed attention to many aspects of the site of the application which is part of the area which the Concept Plan argues should be protected through Local Green Space designation. The Parish Council document includes in detail:

- Residents' views, including opposition to development plans running at 90%+ in local consultation events

- The history of Leckhampton, including the history of 'open' or common meadows and fields in the area of the application site
- The exceptionally rich local ecology, wildlife and habitats. Local wildlife includes five varieties of bat (including two priority species: the noctule and soprano pipistrelle), willow warblers, blue tits, cuckoos, yellowhammers, starlings, adders, grass snakes, hedgehogs and badgers. The concept plan highlights their importance of the traditional hedgerows and orchards in the context of the UK Biodiversity Action Plan.
- Sustainability including highlighting issues raised in the JCS Sustainability Analysis
- Traffic congestion and poor air quality
- Flood risk
- Landscape and visual impact
- Agricultural uses and value
- The area's connection to the nearby urban population

This must be one of the best researched concept plans for a Neighbourhood Plan anywhere in the country. It would be against the whole direction of new national planning policy if it was pre-empted by granting this application.

#### 4. Designation is consistent with the National Planning Policy Framework

LGS designation is included in the National Planning Policy Framework. It is the basis of many ministerial statements that the government has produced a tool that 'local communities can use to protect open places they value' (Prime Minister to Dame Fiona Reynolds of the National Trust, 21 September 2011):

**76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.**

Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.

**77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:**

- where the green space is in reasonably close proximity to the community it serves;
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty,
- historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- where the green area concerned is local in character and is not an extensive tract of land.

*National Planning Policy Framework pp 18-19*

- It is demonstrably special to the local community, having led to the creation of its own pressure group and generated many thousands of petition signatures, letters, emails and individual attendances at meetings over several decades and is the subject of the LGS application in the Parish Council Neighbourhood Plan concept plan.
- It holds significance, for its unkempt rural charm, its animals so close to where children can go to 'see the pigs', its history, recreational value, tranquillity and the richness of its wildlife as detailed in innumerable submissions and consultation responses by thousands of local residents over the years.
- It is very local in character (as inspectors have noted) and not an extensive tract of land.

The original **JCS Sustainability Analysis** p112 concluded that the broad location south of Cheltenham, including Leckhampton, enjoyed:

- 'Sites of biodiversity value' (RED)
- 'Development of the site would be likely to lead to the fragmentation of important habitats' (RED)
- 'The area displays a good mosaic of habitat types which could make mitigation difficult' (RED)
- For overall biodiversity impact, the site shows 'intimate rolling landscape, predominantly pastoral with improved and semi-improved pasture. Good hedgerow condition and good proportion of orchard ... good number of parkland trees and many veteran oaks along with other species. Small pockets of woodland dotted around the site. Area around Leckhampton displays unusual land use pattern with many smallholdings, orchards and allotment/market gardens. Good brookline and associated tree cover.' (RED)

Inspectors have repeatedly rejected appeals by developers, citing the rural character of the land:

- **In 1993** Inspector Brian Dodds ruled that **'the land at Leckhampton should be protected for its special historical, landscape and amenity value. It represents the last example of the gradual transition between the urban area and the countryside which characterised the Regency town.** It should be considered anew for green belt or AONB status, for 'landscape conservation area' status, and as part of a Leckhampton Conservation Area (35A, 129W).
- **In 2003** Inspector Mary Travers, conducting an enquiry on Leckhampton development reported that:

"2.25.11 The site consists of four fields subdivided by substantial hedgerows that are interspersed with hedgerow trees. It has a gently rolling, topography and an attractive pastoral character that in my view links strongly into the landscape of the AONB immediately to the south of Leckhampton Lane. Generally the contours fall from south to north and from east to west and there is a distinct ridge running roughly northwest-southeast through the site- -so that the south-eastern corner is the most elevated part. A public footpath that traverses the northern part of the site forms a link in a network of rural paths to the east and west of the site.

"2.25.12 As can be observed from public vantage points, the site is highly visible from within the AONB, for example from the lower slopes of Leckhampton Hill and from higher up at the Devil's Chimney. It is also visible partly from the west and in long distance views from the north. There is a substantial hedgerow on the western boundary with the Green Belt but this area drops away towards the Vale of Gloucester As a result, development on the more



elevated south-eastern part of the site would be very conspicuous from the western approach along Leckhampton Lane where it would be seen within the context of the AONB. And looking southwards from the public footpath across the site **it is apparent that development would entail a significant intrusion into views of the open countryside and the AONB from the existing edge of the built-up area. It would also sever the link between the rural footpaths to the east and west of the site and replace it with one of an entirely different character. For these reasons and taking into account the scale of the proposed development, I consider that its visual impact on the surrounding countryside would be very significant and that it could not be easily mitigated."**

- **In 2005, Inspector David Asher was looking into the Cheltenham Local Plan, and concluded "that the development of the objection site would materially harm the rural character and appearance of the area, and the important contribution that this makes to the landscape within the site and when seen from the AONB."**

The National Planning Policy Framework (NPPF). This key government document is often quoted selectively by developers and others as if it was a developer's charter. It is not.

The key element of the NPPF is often cited as the presumption in favour of sustainable development. But the presumption in favour of *development* was already there in planning law and policy. What the NPPF added, very significantly, was the element of *sustainability*.

The Department of Communities and Local Government itself has made clear:

'The presumption is not a green light for development. All proposals will need to demonstrate their sustainability and be in line with the strict protections in the draft Framework. Strong environmental safeguards remain as part of the planning system, including protecting communities and the environment from unacceptable proposals. **The presumption is principally about good plan making. Once a Local Plan is put in place, local decisions should be made in line with it.'**

*DCLG National Planning Policy Framework: Myth-Buster 8 September 2011*

A key theme of the NPPF is the empowerment of local communities and neighbourhoods (see the ministerial foreword, paragraph 1, the first core planning principle at paragraph 17 and many other paragraphs throughout the NPPF).

Paragraph 155 gives particular weight to consultation with neighbourhoods – by which it means local neighbourhoods roughly equivalent to parishes:

**"Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made."**

The original reasons for the area's protection in the Cheltenham Local Plan are also supported by the NPPF. Four of the core planning principles set out in the NPPF right next to the one about meeting development needs, state that councils should:

- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, **recognising the intrinsic character and beauty of the countryside** and supporting thriving rural communities within it;
- contribute to **conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value**, where consistent with other policies in this Framework;
- encourage the effective use of land by **reusing land that has been previously developed (brownfield land)**, provided that it is not of high environmental value;
- promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, **recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);'**

Paragraph 74 says that 'Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- 'an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.'

Paragraphs 109 to 125 detail at length the requirements to protect the natural environment including:

- Protecting and enhancing valued landscapes (paragraph 109)
- Recognising the wider benefits of ecosystem services (109)
- Providing net gains in biodiversity (109)
- Preventing new developments from contributing to unacceptable levels of air pollution (109)
- Minimising effects on the natural environment (110)
- Encouraging the use of brownfield land (111)
- Protecting biodiversity, wildlife and landscape value (113, 114, 117, 118)
- Reducing physical pollution (120, 124)
- Reducing light pollution (125)

All of these can be cited in support of Local Green Space designation at Leckhampton.

**Martin Horwood MP**  
January 2015





# July 2013

## Leckhampton with Warden Hill Parish Council Neighbourhood Planning NPPF Concept Plan & Local Green Space Application



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Leckhampton with Warden Hill Parish Council -  
July 2013

## Foreword

The Parish Councils of Shurdington and Leckhampton with Warden Hill have formed a Joint Neighbourhood Forum (JNF) for the primary purpose of Neighbourhood Planning as directed by and compliant with the National Planning Policy Framework<sup>[1]</sup> (NPPF). This submission, which has been led by Leckhampton with Warden Hill Parish Council (LWWH PC) with support from Shurdington Parish Council, is the first output from the work of the JNF and is in direct response to the Localism Act<sup>[2]</sup> which received Royal Assent on the 15<sup>th</sup> November 2011 and whose major measures came into effect in April 2012. The Act empowers local communities in local planning and to protect areas of special value:

- New freedoms and flexibilities for local government, *'local authorities can do their job best when they have genuine freedom to respond to what local people want'*
- New rights and powers for communities and individuals, *'this Act passes significant new rights direct to communities and individuals, making it easier for them to get things done and achieve their ambitions for the place where they live'*
- Reform to make the planning system more democratic and more effective with a duty to cooperate by neighbouring councils, *'planning did not give members of the public enough influence over decisions that make a big difference to their lives, the Localism Act contains provisions to make the planning system clearer, more democratic, and more effective'*
- Reform to ensure that decisions about housing are taken locally

This new localism was part of a larger plan for Britain by the Coalition Government - *"The time has come to disperse power more widely in Britain today"* - Coalition Agreement, May 2010.

*The Localism Act<sup>[2]</sup> sets out a series of measures with the potential to achieve a substantial and lasting shift in power away from central government and towards local people. They include: new freedoms and flexibilities for local government; new rights and powers for communities and individuals; reform to make the planning system more democratic and more effective, and reform to ensure that decisions about housing are taken locally.*

The Joint Neighbourhood Forum at its third meeting on 4 February 2013 resolved under the Act to draft a NPPF Neighbourhood Concept Plan and to make a formal Local Green Space (LGS) application for the Leckhampton Green Field Land. This land is detailed in the maps of Appendix 1 and lies in both parishes. The Concept Plan builds on a previous proposal for a Cheltenham Country Park, which was supported by a petition signed by some two thousand local residents and was well received by Cheltenham Borough Council, the response from the Leader of the Council, Cllr Steve Jordan at full council, 10th November, 2011) - *'Cheltenham Borough Council takes the issues raised in the petition very seriously and the resolution I am proposing to Council this afternoon restates the intention to protect Green Belt and open countryside around Cheltenham'*.

The Leckhampton Green Field Land has been safeguarded in the current CBC Local Plan; large scale development has been rejected by planning officers and the Planning Inspectorate on sustainability grounds. Both parish councils have been greatly concerned, therefore, by the proposals, initially in the SW Regional Spatial Strategy and subsequently retained as an option by the Gloucester-Cheltenham-Tewkesbury Joint Core Strategy (JCS), for large scale development on this land. There is a risk that the land might be made a JCS Strategic Site targeted for large scale development. Both councils are strongly opposed to this for reasons that are brought out in this submission:

- the amenity value of the land;
- its great importance to the view from Leckhampton Hill and proximity to the Cotwolds AONB;
- the history of Leckhampton village, dating back over a 1000 years;

- the highly valued ecology and wildlife in the area;
- the problems of traffic congestion, air quality, surface water flooding and the shortage of secondary school places.

LWWH PC has made detailed submissions with strong evidence in the JCS public consultation, but the Council fears that decisions could nevertheless be imposed on the area that are very damaging not only to the parishes but to the town and future generations. Accordingly, the Council has gathered together the expert evidence presented in this submission both of the value of the Leckhampton land and of the dangers facing local people and the Cheltenham area, particularly from the severe traffic problems that would result from development on this land.

The Council has gathered the views of local residents about the future of the Leckhampton land. Chiefly this was done through a Council survey that was conducted at the exhibition held by the developers' consortium on 22 September 2012 to present their initial development proposals for public comment. The survey showed overwhelming public opposition to development. A similar finding came from the exit polls conducted by Leglag at all four of the public exhibitions that were held. The main public concerns are over the loss of the green field land and over the problems of traffic congestion, secondary schooling and flooding.

This submission seeks to make a positive input into the Joint Core Strategy on the current strategic site allocation and to contribute to the process of updating the Cheltenham Borough Council and Tewkesbury Borough Council local plans to be NPPF-compliant.

The forum would like to acknowledge the support from Cllr. Mrs Jo Sobey, chair of Shurdington Parish Council, and from Cllr. Paul Rider, chair of Leckhampton with Warden Hill Parish Council, in the compilation of this Concept Plan and Local Green Space Application.

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## Executive Summary

In 2012, Leckhampton with Warden Hill Parish Council (LWWH PC) and Shurdington Parish Council set up a joint neighbourhood forum (JNF) for the purpose of developing a neighbourhood plan for the area covered by the two parishes. This submission, which has been led by LWWH PC with support from Shurdington Parish Council, is the first output from the work of the JNF.

Both parish councils have been greatly concerned by the proposals for large scale development on the Leckhampton Green Field Land. They have strongly and consistently opposed such development for reasons that are brought out in this submission: the amenity value of the land; its great importance to the view from Leckhampton Hill; the history of Leckhampton village, dating back over a 1000 years; the ecology and wildlife in the area; the problems of traffic congestion, flooding and the shortage of secondary school places. LWWH PC has made detailed submissions with strong evidence to the JCS and now fears that decisions could be imposed on the area that are very damaging not only to the parishes but to Cheltenham as a whole.

Accordingly, LWWH PC has assembled the expert evidence presented in this submission both of the value of the Leckhampton land and of the dangers facing local people and the Cheltenham area, particularly from the severe traffic problems that would result from development in Leckhampton. Expert summaries of the history of the area and of its ecology and wildlife are included in the submission in sections 3.1 and 3.2. Sadly, until the 1960s, scant importance was attached to preserving the UK's historical heritage and many buildings and areas were destroyed. The cultural and economic value of historical areas is now much better understood and rightly protected. The ecological and wildlife survey prepared for the Council by three experts shows the rich diversity of habitats. Part of the aim for the Local Green Space is to enhance its value to Cheltenham as a wildlife area.

The Council has gathered the views of local residents about the future of the Leckhampton land. The survey showed overwhelming public opposition to development. Similar findings have come from polls conducted by Leglag.

The traffic surveys, model and analysis have involved considerable work by LWWH PC. The findings have been independently verified by traffic consultant Rob Williams, a director of Entran Ltd and well respected by Mark Power of Gloucestershire Highways, from whom the Council has also received valuable advice. The traffic model allows various scenarios to be examined. It shows that development on the scale currently being proposed would cause the A46 traffic queue to extend to the A417 and potentially to the M5. The time it would take to commute into Cheltenham would impose a great economic cost and would make it hard for people living south of the A417 to work in Cheltenham.

Even tighter constraints are imposed by two other factors discussed in Annex 2: the need, confirmed by Mark Power, to prevent any major increase in traffic levels on Church Road during the morning peak period, and secondly the pollution levels on the A46, particularly around the Moorend Park Road intersection, which exceed permitted EU levels. These two factors leave little or no scope for sustainable development on the Leckhampton Green Field Land, particularly when taken in conjunction with the rise in general UK traffic levels from 2015-2025 now predicted by the Department of Transport. LWWH PC has also looked at possible new employment sites around Cheltenham being considered by the JCS to check that these do not materially alter this conclusion.

Under the NPPF a neighbourhood plan cannot be used to prevent sustainable development. Having regard to this, LWWH PC has investigated various options for the size and boundary of the Local Green Space, as described in Annex 2. For the reasons explained in Annex 2, the Council resolved at its public meeting on 25 July 2013 to include all of the Leckhampton Green Field Land in the LGS. This decision has been supported by Shurdington

Parish Council in a draft letter of endorsement which is included at Annex 1 and which Shurdington Parish Council intends to formally ratify at its next public meeting.

This submission seeks to make a positive input into the Joint Core Strategy on the current strategic site allocation and to contribute to the process of updating the Cheltenham Borough Council and Tewkesbury Borough Council local plans to be NPPF-compliant.

This Neighbourhood Planning Concept Plan & Local Green Space application is compliant with the National Planning Policy Framework <sup>[1]</sup> (NPPF) published in March 2012 in policy, both in the definition of sustainability and recognises the importance of the natural environment.

In the Ministerial Foreword to the NPPF, the Rt Hon Greg Clark MP states that in the past communities have been excluded from Planning and that this process must be a creative exercise in finding ways to enhance and improve the places in which we live our lives. The National Planning Policy Framework is a radical change and has introduced neighbourhood planning to positively encourage Parish Councils & Communities to get involved, 'written simply and clearly, we are allowing people and communities back into planning'.

[1 - NPPF Ministerial foreword]

- *Sustainable means ensuring that better lives for ourselves do not mean worse lives for future generations;*
- *Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul;*
- *Development that is sustainable should go ahead, without delay – a presumption in favour of sustainable development that is the basis for every plan, and every decision. This framework sets out clearly what could make a proposed plan or development unsustainable.*

These principles, of seeking sustainable development so elegantly defined, together with the protection of the natural environment, have underpinned the development of this Neighbourhood Concept Plan and Local Green Space Application.

The village of Leckhampton is situated to the south of Cheltenham linked to Cheltenham to the north and east by developments along Leckhampton Road. To the west is the Leckhampton Green Field Land and on the south side it borders the Cotswold AONB and the scarp of Leckhampton Hill. The village has retained much of its rural character and this character is greatly valued by residents in the village and also by people in Cheltenham who use the Leckhampton Green Field Land and Leckhampton Hill. The village also has easy access to Cheltenham by foot, bicycle and bus route F every 30 minutes along Leckhampton Road. Crime levels are low and the village has a relatively good, friendly and caring community. The village is very heavily used for many activities. There is an OFSTED outstanding primary school (Leckhampton Primary School) and the village attracts families with young children, although as already noted some then move away to find secondary schooling. The village is mainly residential and has little local employment. Residents commute mainly into Cheltenham, and to Gloucester and locations north and south along the M5 and via the rail services from Cheltenham.

In terms of the three NPPF principles cited above:

1. Leckhampton Village is sustainable, it is a desirable area to live in, as reflected in relatively high local house prices, and it has good local facilities.
2. The local environment is well looked after, particularly by volunteer groups, notably Friends of Leckhampton Hill and Charlton Kings Common, Leckhampton Green Land Action Group (Leglag) and the Cotswold Voluntary Wardens. Cheltenham Borough Council and Leckhampton with Warden Hill parish council also help to look after footpaths and to deal with any litter. Local people take a pride in the area, which has special beauty at different times of the year. The Leckhampton Green Field Fields serve not only the residents of Leckhampton Village but also residents from a radius of about a mile in Warden Hill



and Up Hatherley to the west, in urban Leckhampton and The Park to the north, and in Pilley and Charlton Kings to the east.

3. The South West Regional Spatial Strategy suggested locating 2000 new homes in the area south of Cheltenham. Much of this would almost certainly have fallen on the Leckhampton Green Field Land. The SWRSS was simply gathering as many potential site for development as it could find and did not appreciate the serious traffic implications discussed in Annex 3. The SWRSS has now been set aside, but its legacy has lingered and there is now a serious risk of damaging unsustainable development slipping through, fostered by pressure from developers eager to exploit the relatively high house prices in the Leckhampton area.

Land at Leckhampton has been the subject of development pressure for a number of years with numerous enquiries. The Inspector considering objections into the Second Review of Cheltenham Borough Local Plan<sup>[3]</sup> concluded that, *“development of the objection site would materially harm the rural character and appearance of the area, and the important contribution that this makes to the landscape within the site and when seen from the AONB.”*

In the Cheltenham Borough Local Plan<sup>[4]</sup>, Second Review, Adopted July 2006, para 7.41 the Inspector’s report was discussed, *‘the Council supports the Inspector’s conclusions and considers that the intrinsic value of the land should be protected as a resource for its recreational, landscape, wildlife and archaeological interest. Any proposals for development within this area will be considered against policies CO 1 (landscape character) and CP3 (sustainable environment)’.*

There is one ancient monument under S.1 of Ancient Monuments and Archaeological Areas Act 1979, the Leckhampton Moated Site to the west of St Peter’s Church and marked by ordinance survey.

A neighbourhood plan is primarily about the use and development of land and buildings. It forms part of the planning for shaping the future of the area, alongside a sustainable community strategy. In modern times Leckhampton has retained its rural character whilst being well connected to the urban centre with good schools, health care and work opportunities within the town and local area. This section reviews some of the main issues and public concerns with large scale development and provides inputs to the neighbourhood planning process.

**Roads and commuting:** Leckhampton and Shurdington suffer from heavy traffic congestion at peak times on Shurdington & Church Roads; the local network is near capacity. As a direct result, in recent years we have seen a deterioration of air quality on Church Road and now evident on the Shurdington Road with a new monitoring tube added in March 2013. Both monitoring positions in Leckhampton will break the EU limits of  $40\mu\text{g}/\text{m}^3$  of Nitrogen Dioxide ( $\text{NO}_2$ ) in some months, this may be linked to a worrying increase in the incidence of respiratory disease at local schools (NHS report and schools nursing organisation). Leckhampton is also the most car dependent ward in Cheltenham as reported by the County Statistics Office.

Both LWWH and Shurdington are mainly residential, with little employment located in the parishes. Residents commute mainly by car. Safer cycling routes would be helpful, but unfortunately the narrow roads, congestion and density of parked cars make this difficult. A more frequent bus service with routes connecting to more parts of the Cheltenham area would be helpful. Unfortunately, however, there is a viability problem in that people will not use buses if there is a long wait for the bus or long delays in changing buses, but providing frequent buses and a rich route network is only feasible financially if the buses are well used. The number 10 bus runs every 10 minutes along the A46 in peak times. Yet it was observed during the traffic surveys along the A46 that very few people seem to be using it to travel to work. The developers proposing to build houses on the Leckhampton Green Field Land have suggested that greater use of the buses could solve the traffic problem. But there seems little hope of inducing significantly more people to use buses. A park-and-ride scheme on the A46 has been considered many times, the width constraints of the A46 make a bus lane impossible. Experience with park-and-ride schemes elsewhere in Cheltenham shows it can be hard to make these really successful even in more favourable locations. Traffic and the link to air quality is a concern on Church Road and along the A46 and this is discussed further in Annex 2.

**Increased Flood Risk:** Leckhampton and Warden Hill has seen an increasing flood risk due to changes in rainfall patterns compounded by surface water runoff due to the close proximity of Leckhampton Hill and the clay soil conditions south of Farm Lane. Forty five homes were impacted by the floods of 2007 in Leckhampton & Warden Hill and now struggle to get home insurance, the fields flood most winters and are saturated for long periods. Only a minimal flood protection scheme has been put in place on a small section of the Shurdington Road and all proposed new development is on the other side of this barrier.

**Health and fitness:** Encouraging people to walk more would be beneficial for health as well as traffic congestion. To encourage walking for fitness and leisure, LWWH PC sponsors four walks around the Leckhampton Green Field Land and on Leckhampton Hill and Charlton Kings Common, providing some funding and effort for footpath maintenance. The Council is also developing a website describing local walks to encourage more people to walk in the countryside. The Cotswold Voluntary Wardens and the Ramblers organize regular local walks. The local footpath infrastructure is maintained by the Friends of Leckhampton Hill and Charlton Kings Common (FOLK), by the Cotswold Voluntary Wardens, by the parish councils and by the County Council. The Burrows Sports Field provides facilities for team sports and there are other sports and fitness facilities close by in Cheltenham.

**Housing, population balance and employment:** Shurdington Parish Council sees a need for a steady trickle of new development in Shurdington Village in order to bring in younger residents and to maintain the balance and

vitality of the community. Leckhampton and Warden Hill on the other hand are much larger communities where there is a natural cycle with generations move in and out. Leckhampton has an outstanding primary school, which attracts families with young children. Whilst major new development is not needed in Leckhampton to keep the community balanced, there is a general problem in Cheltenham of an ageing population. This is due not only to people living longer but also to a net inward migration of people in the over-60 and over-75 age groups and by net outward migration of younger people and loss of local employment. LWWH PC raised this issue strongly in its response to the JCS consultation in February 2012. According to the Cheltenham and Gloucester Connectivity Study Draft Phase 1 Report May 2010, Cheltenham suffered a decline in local employment of around 2% per annum from 2003 to 2008; this requires further study.

**Shopping and community facilities:** The LWWH area has a thriving shopping centre in the Bath Road as well as supermarkets within easy reach and local shops on Leckhampton Road and in Salisbury Avenue. The village hall in Church Road is very well used and is well supported financially by local people. A large hall is available at Leckhampton Primary School able to take public meetings of over 300 people. More use could also be made of St Peter's Church when it is not being used for worship. St Peter's is sometimes used for concerts and the church cottages provide a room and facilities for small events.

**Youth facilities and Unemployment:** There are sufficient facilities for youth work. The scout hut in Leckhampton needs major renovation, but this may occur as part of the proposed redevelopment of the adjacent brownfield site. The Brizen Young People's Centre near the Up Hatherley Way roundabout is new and is a good facility that is available for general use as well as for the youth work. The local schools also provide activities. What the area needs is not more facilities but more funding for professional youth workers and more volunteers to help with youth work. The youth work at Brizen Young People's Centre is supported by donations, by revenue from lettings and by funding from LWWH PC. Local churches also fund two professional youth workers serving the south Cheltenham area.

The young unemployed remains a problem, commerce & business enterprise would benefit from closer links with the University and Colleges to improve job opportunities, working on vocational training, job creation in spin out companies and applied research. A large proportion of the town's population have higher educational qualifications and local skills are underutilised.

**Maintenance of the local area:** With further major austerity cuts coming between now and 2018, the maintenance of the local area and local services will be an increasing problem. The pot-holed state of the roads and the uneven pavements are common complaints from local people and present a risk of injury to cyclists and pedestrians. Dog fouling is a significant local problem; more enforcement is needed, but impossible with the austerity cuts. Littering and dumping are minor problems on the Leckhampton Green Field Land. LWWH PC does occasional litter picks. Litter on Leckhampton Hill is a bigger problem, but the FOLK has frequent volunteer working parties that keep the area pristine. Volunteers also maintain the flower bed at the Leckhampton Road and Moorend Road junction, with funding support from LWWH. In Warden Hill there is strong volunteer activity through In Bloom for Warden Hill maintaining the attractiveness of the area. With the further austerity cuts in the pipeline, more volunteer effort like this is going to be very important.

**Agriculture:** Leckhampton has been farmed for centuries and local food production will become increasingly important in a renewed drive to transition the UK to a low carbon economy. For every calorie of food produced, modern farming requires up to 10 calories of input energy from the fossil fuels used in fertilizers and pesticides and for powering farm machinery and transporting food over long distances. This energy demand makes the system vulnerable as carbon emission and global warming become increasingly serious. The need to increase the land use for food production will become more important in the coming decades as global warming takes greater affect, with large projected rises in global population (9.1 billion by 2050), and the prospect of soaring food prices, food security will come to the top of the international agenda <sup>[7]</sup>. In the last decade the UK balance

of trade in all foods has seen an increasing deficit to -£18.5 Billion (DEFRA AgriStats<sup>[8]</sup>) in combined arable and livestock production, an increased deficit of over 120% in just one decade. However, in Gloucestershire there are real opportunities in local fruit and vegetable production, the Countryside & Communities Research Unit reported on county production<sup>[10]</sup>, *'demand for local produce is high in the county along the entire food supply chain, listing the local grower's name with the produce does differentiate the product and boost sales, as local provenance is increasingly valued'*.

Gloucestershire Food Vision predict an inability to meet local demand of fruit & vegetables, *'an integrated food policy for the people of Gloucestershire'* (Gloucestershire First, 2005), highlighted that there is *'a distinct lack of good Gloucestershire evidence around food related issues'* and that *'research that is distinct to Gloucestershire needs is essential'*. This finding reinforced an earlier observation of the Gloucestershire Food Procurement Strategy Group (2004) that - *'Despite a vast array of products it is well known that Gloucestershire is very heavily focused on meat and dairy items. We would be in short supply to meet the demand for fruit and vegetables. That said, there is no specific evidence base from which to work... we recommend a detailed audit be carried out of every item produced within Gloucestershire.'* There are real economic growth opportunities in local fruit and vegetable production within the county, the Leckhampton Green Land is a valuable agricultural asset.

There is a high demand in Cheltenham for more allotments and this should be encouraged. One objective of the Local Green Space application would be to make more allotment land available and possibly to introduce one or more community-supported agriculture (CSA) schemes. CSAs are already popular in the US, Japan and France. There are many different CSA models but essentially they involve local people buying an interest in a small farm, small-holding or market garden and in return getting a share of the produce. Some CSAs start with a producer looking for local supporters and consumers; others are started by communities forming co-operatives that acquire land and/or glasshouses and produce food on it. Sometimes the effort is all voluntary; sometimes the CSA has employed staff as well as volunteers. CSAs are one of the ideas for enabling the Leckhampton Green Field Land to benefit more Cheltenham people and to help residents connect more strongly to the land and food production. A CSA can also help to build more community involvement and volunteering.

The Leckhampton Green Field Land is substantially grade 2 agricultural land. It has been farmed for over a thousand years and until the 1960s it had thriving market gardens, orchards, small holdings and small farms. These declined as a result of modern intensive horticulture but the prospects are reasonably good that the area could thrive again both through conventional, zero carbon hydroponic farming with research links to both Gloucestershire and Bristol Universities and also through CSAs.

## 2.1 RESIDENTS VIEW ON THE FUTURE OF LECKHAMPTON

There has been long-term strong opposition from the local residents and other stakeholders to large scale development on the open countryside at Leckhampton and on the adjacent land in Shurdington; this area has been protected by many generations. Many residents now feel that Leckhampton faces the perfect storm, with the absence of NPPF compliant local plans, a push for house building from the coalition government and the myth that the NPPF is pro-build without constraint. However, this is not affecting public opinion, from the numerous exit polls conducted by both LWWH PC and Leglag at developer exhibitions, it has been found consistently that over 90% of people were strongly opposed to large scale development in Leckhampton, the same has been clearly evident in both the JCS Public Consultations.

In November 2012, developer exhibition plans were unveiled for large scale development on the green fields in Leckhampton & Shurdington. Over eight hundred and fifty people attended the three day event, a significant fraction of the total ward residents. The outline plan covered a large 1300 houses development on open farm land & recreational green space which had been designated in the draft JCS as a 'Strategic Site'. Very few people



positively supported the proposals at 26 (3%) with 837 (94%) opposed; this result has been broadly repeated at repeat exhibitions in December 2012 and February 2013.

LWWH Parish Council has also gathered the views of local people about the future of the Leckhampton Green Field Land. Chiefly this was done through a survey at the exhibition held by the developers' consortium on 22 September 2012 to present their initial development proposals for public comment. A total of 183 survey forms were completed by people attending on 22 September. The results showed overwhelming public opposition to development: 79% of respondents were strongly against development, 13% were against, 5% were neutral and only 3% were in favour. The Leglag polls at all three of the public exhibitions and also at two later exhibitions held in 2013 highlighted specific concerns expressed by residents in the survey: loss of the green fields (74%); effect on the view from Leckhampton Hill (66%); shortage of secondary school places (49%); traffic congestion generally (37%); traffic congestion at specific locations as follows - Church Road (46%), A46 (40%), Farm Lane (35%), Moorend Road (26%); NHS cuts, hospitals and care (33%); flooding (21%); protecting wildlife habitats (10%). Issues that did not provoke as much concern as might have been expected were: need for affordable housing (2%); crime (2%); effect of large scale development on local house prices (2%).

In another public consultation, two thousand local residents signed the Leglag petition to protect the Leckhampton land from inappropriate development and to make the land into a designated 'Cheltenham Country Park'. This proposal is, by their words, being taken seriously by Cheltenham Borough Council, but quite what a 'country park' means is not certain. It does not mean leaving the land in its present state. There may be some small scale development but of a form consistent with a park, and probably improving the beauty of some of the fields and streams, especially those north of Kidnappers Lane. It also envisages maintaining the rural feel; it would not be the same as a town park.

The 'country park' is a good basis for an NPPF Local Green Space (LGS) application since it is already well supported by local people and contrasts with the more formal town parks in the centre and north of the town. The land has been used for arable farming and grazing cows & sheep for centuries, has been safeguarded in local plans and large scale development has consistently failed sustainability test. It should now be possible to implement an overall plan for a NPPF LGS covering not only the Leckhampton land within LWWH parish but also within Shurdington.

Since 1970, there have been repeated applications from developers to build on the Leckhampton fields and all have been rejected on sustainability grounds and on the proximity to the Cotswolds AONB. The vast majority of local people would be very happy to see this situation continue, people who were originally attracted to this area simply due to its rural character. However, there is now an unprecedented pressure from developers to build on the land and it would be a high risk to assume that planning approval will be refused in a reinterpretation of the evidence. The result of the recent planning appeals in Bishops Cleeve has demonstrated that the Parish Council needs to have a positive plan for using the land, otherwise, it could get designated for high density housing by default. We need the Leckhampton land to be identified in the local plan as a strategic site not for development but valued for food production, recreation for the wider town population and for the rich natural environment.

The Joint Neighbourhood Forum has carefully considered many alternative uses of the Leckhampton open countryside adjacent to the Cotswolds AONB. Leckhampton with Warden Hill Parish Council, as the lead Council for this work, now formally submits this application for a NPPF Local Green Space as part of the joint neighbourhood planning to Cheltenham and Tewkesbury Borough Councils. The area of the proposed Local Green Space is detailed in the maps of Appendix 1.

One of the core planning principles of the NPPF<sup>[1]</sup> is to “*take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it.*”

Leckhampton with Warden Hill Parish Council submit this Local Green Space application in accordance with Paragraphs 76-78 of the NPPF<sup>[1]</sup>:

*76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.*

*77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:*

- *where the green space is in reasonably close proximity to the community it serves;*
- *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- *where the green area concerned is local in character and is not an extensive tract of land.*

*78. Local policy for managing development within a Local Green Space should be consistent with policy for Green Belts.*

#### ***Protecting Green Belt land***

*79. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*

The NPPF contains specific policy to protect our Natural Environment and recognises the importance of both accessible green space for our wellbeing and to maintain or restore biodiversity and habitat:

[NPPF Ministerial Forward]

*Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul.*

On Sustainable Development, again the NPPF is very clear:

[NPPF Achieving sustainable development p2 – KEY OBJECTIVE]

*International and national bodies have set out broad principles of sustainable development. Resolution 42/187 of the United Nations General Assembly defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The UK Sustainable Development Strategy Securing the Future set out five 'guiding principles' of sustainable development: living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly<sup>[1]</sup>.*

And setting out an important environmental role <sup>[1]</sup> – *contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.*

The following NPPF core planning principals add the detail lend support to Neighbourhood Planning and to this Local Green Space application <sup>[1]</sup> Para 17 bullets 1, 6, 7, 8 & 10

- *be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a 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;*
- *support the transition to a low carbon future in a changing climate, taking full account of food risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);*
- *contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;*
- *encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;*
- *conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations; take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.*

The NPPF on green space used for recreation.

74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Section 11 of the NPPF on 'Conserving and enhancing the Natural Environment', has been extracted in full for reference; please see Appendix 2.

The Department of Communities and Local Government have provided some important guidance on the application of the NPPF and dispelled some of the myths:

**Response from the Department of Communities & Local Government (DCLG) on the NPPF <sup>[1]</sup>**

*There is a myth being promoted that the NPPF is a developer's charter, this is simply not true. From the birth of modern planning in 1947 there was a presumption in favour of development. This was turned into a plan-led approach in 1991. The presumption in favour of sustainable development carries forward this emphasis on positive planning, while reinforcing the primacy of the democratically produced local plans. Where plans are not up-to-date, the strong national policies we have set out provide a robust framework for making decisions, safeguarding the things matter like the Green Belt and areas at risk of flooding.*

*The presumption is not a green light for development. All proposals will need to demonstrate their sustainability and to be in line with the strict protections in the Framework. Strong environmental safeguards remain as part of the planning system, including protecting communities and the environment from unacceptable proposals. The Presumption is principally about good plan making. Once a local plan is put in place local decisions should be made in line with that plan.*

*The Framework puts local people in the driving seat of decision making in the planning system. Communities will have the power to decide the areas they wish to see developed and those to be protected, through their Local Plan. Once a local plan is in place which has the support of the local community that is what will drive decision making.*

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*Green Belt, Areas of Outstanding Natural Beauty and other designated land will retain the protections they enjoy today. In addition communities will be given a new power to protect locally important green spaces which are a vital part of residents' quality of life. Rather than imposing targets or blueprints from above, this Government is changing things so local people and their councils decide for themselves where to locate development and how they want their local area to grow. Development will need to be sustainable and not in breach of the framework's environmental protections.*

*The new framework re-affirms the Government's commitment to maintaining Green Belt protections that prevent urban sprawl. Inappropriate development, harmful to the Green Belt, should not be approved. Legislation will also remove the top down pressure on councils to build on the Green Belt.*

**DCLG National Planning Policy Framework Myth-Buster Thursday, 08 September 2011**

[NPPF Para 73]

*Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities<sup>[1]</sup>. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.*

The green space within Leckhampton is absolutely of local significance for its aesthetic and recreational value, a fairly flat area of rolling grassy fields bounded by hedgerows and with the Hatherley Brook & Moorend Stream traversing the area. This area of natural green space is therefore accessible to a range of people of differing physical abilities (e.g. families, the disabled, children and the very elderly). It has historically given a characteristic rural charm to Leckhampton which was once a homestead which grew into a village. The land with its riverine corridor and numerous hedgerows and lines of trees provides habitat for a variety of bird species typical of rural landscapes, as well as bats, amphibians and numerous small mammals. The open semi-improved



fields of tall tussocky grassland provide habitat for reptiles, badgers and birds such as skylarks, which prefer open habitat. There are numerous mature trees, especially oaks scattered throughout the fields, which provide additional character to the area. The green space also acts as a sponge and soaks up the large amount of water which runs off Leckhampton hill, without which many parts of the area, especially land to the south of Leckhampton (e.g. Warden Hill) could be flooded during periods of high rainfall, which is now becoming increasingly frequent.

### 3.1 THE HISTORY OF LECKHAMPTON

It is important to understand the history of Leckhampton in order to assess the merits of this Local Green Space application; an understanding of what shaped Leckhampton will hopefully guide future decisions. What is it about Leckhampton that makes it more than just an extension of Cheltenham?

The Anglo-Saxon name and its listing in the Domesday Book establish the settlement's identity. Today the following are visible characteristics of a village which for most of its existence has been not only physically separate from Cheltenham but also independent in outlook:

St Peter's church	St Philip & St James's church
Leckhampton Court	the remains of the Moat
a few thatched cottages	some stone-built farm houses
Leckhampton Hill	the Devil's Chimney and quarry workings
the Village Hall	the war memorial
the Parish Reading Room	the Delancey Hospital (frontage has been retained)
the 'horse's grave'	Tower Lodge
the rural character	the protected glebe & county land

The name Leckhampton was first recorded in the 9th century, when the settlement was the home farm for the royal manor of Cheltenham. The word is now generally considered to mean, *'homestead where leeks (meaning any kind of vegetable) are grown'*. Indeed, market gardening still thrives on the fine alluvial soil of the valley, while traces of earlier ploughing can still be made out in the ridge and furrow patterns on the lower slopes of the hill, now used for grazing.

The medieval village was close to both court and church. That earlier layout is indicated by a row of 17th-century thatched cottages - 'Moat Cottage,' 'Field Cottage' and 'Sheeps Head Row'. These probably follow the line of an old track and lie at right angles to Collum Street (now Church Road), where there are or were a few other timber-framed cottages, including the so-called 'Cromwell Cottage', demolished in 1962.

The historic parish, both civil and ecclesiastical, was comparatively large and extended from the prehistoric camp on the hill top down as far as Warden Hill - not the same as today's electoral division or the postal district. It was sparsely inhabited until early in the 19th century and its land was largely devoted to agricultural use. Such industry as existed occurred on the periphery, and some artisan dwellings near the top of Old Bath Road and in Pilley housed quarrymen and brickmakers. In general it was not until the mid- to late 19th century that new housing began to spread up the hill from the Norwood Arms, in addition to a few scattered villas occupied by the gentry.

In the Domesday Survey of 1086 two manorial estates (at least) were listed under the heading of Leckhampton. One was probably centred on an island surrounded by a moat. Some of the latter is still recognisable, though much overgrown with trees, beside the rectory; older inhabitants recall being able to skate on its frozen surface!

When the moat was excavated in 1933, traces of a stone building were uncovered, with access by a bridge and a fortified gateway dating from probably the 14th century. Some 16th-century floor tiles were also found. Later the building evidently fell into disuse, and an 18th-century map shows trees growing on the site. A new manor house was built behind the present rectory, serving as a farmhouse until early in the 19th century. This was eventually demolished, some clumps of nettles betraying its former location until these were ploughed over in the 1980s. The moat itself may have much older origins and is comparable to numerous other sites to be found at the foot of the Cotswold escarpment.

The other manor, whose administrative centre will have been on the site of Leckhampton Court, was more powerful, and in due course absorbed the first-mentioned estate. The Court itself, one of the oldest non-religious buildings in the county, was saved from dereliction 20 years ago and very sympathetically restored by the Sue Ryder Foundation. The oldest part, the 14th-century banqueting hall on the east side, has now been converted into a chapel. The south wing, with its half-timbering, is Tudor - the date '1582' is carved over a doorway - as is the section at the end of the north wing, with its twisted brick chimneys. In 1732 a fire destroyed the central part of north wing, which at first was partly filled in by a 3-storey Georgian house. This was demolished at the end of the 19th century and replaced by the north wing, whose 'Tudorbethan' facade is what passers-by now see from Church Road.

From the early 14th century onwards the title to the manor of Leckhampton was held for nearly 600 years by a succession of three interrelated families: the Giffards, Norwoods, and Tryes. All produced men and women of distinction as well as benefactors to the local community. Sir John Giffard, d. 1330, was the first builder of the Court - and of the church, where he and his wife are commemorated by carved effigies. When Eleanor Giffard married John Norwood in 1486 the tenure passed to the Norwoods. The 16th-century William Norwood (whose portrait hangs in Cheltenham Art Gallery) was probably the most distinguished. He was MP for Gloucester, and Lord of the Manor of Cheltenham through his marriage to Elizabeth Lygon, to whom he dedicated a fine memorial brass in the church.

The Trye family's fortunes relied heavily on income from the quarries. The demand for stone declined in the 1880s, and in 1894 it was decided to sell off the estate by auction. This was effectively the end of the old order for Leckhampton, whose status was in any case being eroded; in the previous year a large area in the north-east of the parish had been incorporated into Cheltenham Borough.

The fortunes of St Peter's church and its incumbents are closely linked to the Court. The lords of the manor were patrons until 1903; later that rôle was assumed by the Bishop of Gloucester. No religious house is mentioned in the Domesday Survey, but in 1133 Henry I endowed the Canons of Cirencester Abbey with the church at Cheltenham and its attached chapels. One of these must have been at Leckhampton, for in 1162 its priest, Henry by name, was summoned before Archbishop Thomas-à-Beckett in a dispute over payment of dues to the Canons of Cirencester. Henry was found liable and fined two shillings.

In the churchyard the earliest identified burial dates from 1670, and the oldest person to be interred was Richard Purser, who died in 1868, aged 111. There are also graves of numerous Victorian generals and men who had influential careers in India, in the army, civil service or as planters. Three holders of the Victoria Cross have memorials, as does Dr Edward Wilson, who died on Scott's Antarctic expedition. Baron de Ferrières, a great benefactor to Cheltenham, is buried there, and two stained-glass windows are dedicated in his memory.

Several of the parish priests were members of the Norwood or Trye families. Notable among these was Charles Brandon Trye, son of the surgeon of the same name, who held the post for 58 years, from 1830 to 1888. He was responsible for a number of improvements for the public good: not only the moves to enlarge the church in 1834 and 1866, but also the building of the National School in about 1840 (now used as the canteen) and of the

present rectory. He was a moving force behind the creation of a daughter church to cater for worshippers in the Park and Naunton areas. The church (originally just 'St Philip's') was dedicated on St Philip and St James's day in 1840; it became a parish church in its own right in 1869 and the present larger building, designed by Middleton, replaced it in 1882.

Over the period 1894 - 1906 Leckhampton Hill was the focus of a significant episode with wider implications in the history of Cheltenham. This was the struggle to protect traditional rights of way across the hill, which its new owner H J Dale proposed to close to the public. He built a house ('Tramway Cottage') for his quarry foreman in an old gravel pit beside Daisybank Road, which had been a favourite spot to set up side-shows and stalls on bank holidays. The building also blocked the main footpath up the hill, and later the area above it was also fenced off. There was much local opposition, not least from R C Barnard and other gentry, whose homes backed on to the hill. In 1902 Miss Beale, Headmistress of the Ladies' College, whose pupils were wont to visit the hill for recreational walks, retaliated by sending 100 of her girls to walk over the rights-of-way and by ordering Dale to remove all of his pianos from her establishment!

On several occasions crowds destroyed fences which Dale had had erected. In 1902 four working men, who came to be known as 'the Leckhampton stalwarts', were charged with obstructing the police, they were acquitted, with Ballinger's remaining as a test case. This encouraged as many as 2000 people to gather and walk in procession to Leckhampton. They stopped at the Malvern Inn to hear a rousing speech. They then made for Tramway Cottage, which they dismantled until hardly a stone was left standing. The long awaited trial, 'The Leckhampton Quarries Co. v Ballinger & Cheltenham Rural District Council' began in London before Mr. Justice Eady on 29<sup>th</sup> April 1904. The trial lasted till 12<sup>th</sup> May and was daily reported verbatim in the press such was the public interest. The judge found in favour of Dale's enclosure and only three paths were granted as public rights of way, court costs totalled £6,000. However, Cheltonians put on a brave face and big victory demonstrations took place on the 25<sup>th</sup> May 1904. The Chronicle & Graphic issued six halfpenny postcards of the scenes, one showed Clarence Parade solid with people end to end.



The Leckhampton Stalwarts on the ruins of Tramway Cottage, the picture was taken in the summer of 1904 by Miss N. Moorman in the early morning before work at 6am, Left to Right: Lane, Townsend, Barrett, \_\_\_\_\_, Luce, Tom Field, Ballinger, Heaven, Price (seated), Sparrow, Burford, Mourton & George Richings, determined men, what would they say 100 years on ...

Dale rebuilt the cottage exactly where it had been. On Good Friday 1906 another crowd assembled at the site and the Riot Act had to be read. Arrests followed and eight men were tried at Gloucester Assizes. Sentences of up to six months' hard labour were imposed, though these were substantially reduced on appeal. Leckhamptoners licked their wounds, and Dale imposed many conditions for access to the hill.

The story had a happy ending, however. By 1929, the Quarry Company had gone out of business and Cheltenham Town Council was in a position to purchase the 400-acre estate, the price was £6,500 thus securing the freedom to walk on the land. The dream had come true at last, and there was never a doubt that the decision to buy was right. Councillors enthusiastically marched over the hill and were amazed at the extent of the property, the whole escarpment from Salterley to the far end of Charlton Common, with 300 acres of agricultural land above and below; one of those Councillors was Walter Ballinger.

In a sense, today's successor to the 'Stalwarts' is the Leckhampton Green Land Action Group (LEGLAG), which acts, in a strictly law-abiding way, to conserve and protect local rights. That is a reminder that Leckhampton's history is still in the making. In recent years, for example, we have witnessed the closure of the Malvern Inn, pressure to build more houses, and moves to plant trees on part of the hill. It is for a later generation to assess these developments in truer perspective.

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### 3.1.1 THE FIELDS BENEATH

The history of Leckhampton, like that of so many other once rural parishes, is deeply rooted in the land and in the field systems on which, for centuries, its very existence depended. Changes were slow to evolve and, for the most part, life in the fields and village went on largely unaltered, reflecting only the ebb and flow inherent in the rhythm of the seasons.

Change of a different nature, however, began in the early 1800s with major residential developments in the Park and Gratton estates. Since then more and more of Leckhampton has become urbanised and where this has happened the ancient landscape lies submerged and, in many places, totally obliterated.

It may come as a surprise to many that at one time virtually every piece of land under cultivation in Leckhampton had a name of its own, given to it by those who lived by the land itself and used by them in their everyday language. In all, and discounting alternative spellings, well over 200 fieldnames are known for Leckhampton and recorded in a variety of documentary sources. The majority are provided to us by land surveys and estate plans of the 18th and early 19th centuries, but some date back much further to between the 12th and 15th centuries [6]. Some of these earlier names are clearly of ancient origin and may derive from even Saxon times.

The map below shows the layout of named fields and field boundaries much as they would have been around about the end of the 18th century; it also shows the parcel number(s) for each piece of land as allocated systematically by Croome in 1835.





The first great open fields in Britain are generally believed to have been laid out during the 8th and 9th centuries in response to various demands at the time, not the least of these being population increase and growing

demands for royal and ecclesiastical taxation. Development of the more efficient heavy plough would also have been a factor especially in areas of heavy clay soils. At that time, every manorial estate was in two parts: the lord's demesne, or the manorial home farm (which could be a separate part of the manor or intermingled with the lands of tenants in the open fields) and the land let out to tenants (villeins and bordars).

The open or 'common' fields were broad unenclosed areas of land divided into smaller areas known as 'furlongs' or 'shots' which in turn were subdivided into around a dozen parallel strips, each one running the full length of the furlong and held by diverse individual tenants. These strips were known as acres, ridges or lands <sup>[10]</sup>.

It is clear from written records of land ownership in Leckhampton that even in the mid to late 17th century, within any one open field, varying amounts of land could be held by a number of different owners or tenants, including both manors in the parish as well as the rectory (glebe land). For example, one open field known as Burley is recorded about that time as containing two acres of arable land belonging to the second manor (then held by the Partridges of Wishanger) and also one 'small arable land or butt' of about a quarter of an acre belonging to the rectory <sup>[11]</sup>.

As consolidation of holdings in these open fields took place and landowners began to seek greater independence to cultivate as they wished, the fields gradually became enclosed but this process did not start until around the 14th century. The fact that the Merestones and Starford fields lay on both the Leckhampton and Cheltenham sides of the parish boundary points to at least these open fields existing prior to the setting of the boundary and its related 'mere' stones around the 9th or 10th century. From this, one may reasonably conclude that the lands under cultivation in Leckhampton at the time of Domesday consisted primarily of such open fields.

For evidence of the actual extent of the original open fields in Leckhampton, one has to rely on later sources. Prominent among these is the schedule accompanying the 1778 Act of Inclosure for Leckhampton in which formerly common fields were designated by letters as distinct from numbers which were used for those fields already enclosed. Crow's plan of 1746 is also useful since it indicates where land was still being cultivated in unenclosed narrow strips. Individual fieldnames can provide a clue <sup>[12]</sup> and occasionally a record will go so far as to refer to a field as 'common' or 'formerly common' land.

From such detail, it can be deduced that Leckhampton once contained at least eight, possibly nine, open fields. Beginning in the north of the parish, these were; Merestones, Starford, Stanleyfield, Walkhampstead, Middle Field, Sandfield, Collum Field, Burleyfield and Hillfield.

Many, if not all, of these open fields would have existed in the 11th century when Domesday was compiled; those like Middlefield, Starford, Walkhampstead and the aptly named Sandfield may have been the first to be exploited because they lay on the more easily farmed sandy soil, although by medieval times and the advent of the heavier plough to England, the more fertile clay soil would have been preferred <sup>[21]</sup>.

While some conversion of the open fields in Gloucestershire may have been underway from as early as the 14th century, it has been suggested that, compared to other parts of England, enclosure of fields in this county began relatively late <sup>[25]</sup>. Leland, travelling through the county in the early 16th century, was able to say that conditions in Gloucestershire were still very largely 'in champion', that is in open field. By the end of the 18th century substantial areas of land in Leckhampton were already enclosed since, according to the 1778 Inclosure Act, the area of common fields remaining in the parish was little more than 343 acres, barely a fifth of the total available <sup>[30]</sup>.

The 1778 Act of Inclosure for Leckhampton [31] states its purpose as 'an Act for dividing and inclosing the Open Common Fields, Common Meadows and Pasture Waste Grounds and other Common Lands in the Parish of

Leckhampton, in the County of Gloster; and several small parcels of the said fields which extend into the Parish of Cheltenham' [32]. All these acts had the same basic purposes: to implement and legally register the change from ancient methods of land usage by once and for all extinguishing common rights over a piece of land; to appoint commissioners to survey the relevant land and allocate parcels or blocks to different owners in compensation for the loss of scattered strips and rights of common pasture they had previously held in the open fields; and finally to require the new owners to plant and maintain adequate hedges and roads.

The Act was apparently promoted by the Earl of Essex, who at the time held the impropriation (and was thereby entitled to the tithes) of the rectory of Cheltenham. In addition to the Earl (whose holding of common land was only 8 acres), other persons then holding significant common rights in Leckhampton were:

Henry Norwood Esq (lord of the principal manor of Leckhampton), 82 acres.

Edward Draper (rector of the parish church and as such entitled to certain glebe lands and tithes), 160 acres - with some tithes in kind (i.e. wheat or barley) continuing to be paid on certain properties.

Richard Critchett Esq (who had become lord of Leckhampton's other manor in 1766), 28 acres.

Abraham Wallbank (who had acquired the so called Iles (or Berry) estate and farm (today's Leckhampton Farm), 26 acres.

The Act further provided for:

- ☐ the rector's power to lease out land
- ☐ the setting out of roads
- ☐ the laying together of small allotments
- ☐ the removal of trees, hedges etc.
- ☐ the leaving of convenient gaps in fences and inclosures, for a period of twelve months, for the passage of cattle, carts and carriages (specific mention being made of 'the new road to be used in place of the road or way to Birdlip and Cirencester')

Thus came to an end in Leckhampton a system which had existed in some form since at least Norman times. The theory behind such changes was that the way would become open for leading landowners of the parish to modernise their land husbandry and increase productivity to meet the growing demands of an increasing population. The lord of the manor and the incumbent of the parish church would receive sufficient compensation for the loss of common land rights and tithes while the more lowly copyholders (the 'deserving poor') would find their new plots easier to work than the scattered strips in the open fields. The 'undeserving poor', in their tumbledown homes, would be better off being compelled to work more regularly for an employer

[33].

### 3.2 LECKHAMPTON ECOLOGY, WILDLIFE & HABITAT

The open countryside at Leckhampton is now under immediate threat of large scale development, a re-run of past events seemingly locked into a ceaseless cycle. The area under threat is of immense value to wildlife, biodiversity and the people of Cheltenham; this we will try to demonstrate.

The green fields around Leckhampton comprise a collection of semi-improved grassland meadows, several traditional orchards and small holdings bordered by numerous species-rich hedgerows and trees composed of native species (many of which are mature), with two streams traversing the area. Many of the hedgerows are ancient and date back before Enclosure, in the doomsday book of 1086 the settlement was divided among three landowners and recorded as Lechametone, meaning *'homestead where garlic or leeks were grown'*. These rich habitats provide a refuge for a variety of wildlife as frequently recorded by local residents; and were validated these have been catalogued and added to the county database.

A data search from the Gloucestershire Environmental Records Centre revealed numerous wildlife records, including many protected species or those of conservation concern, within the site and close proximity: Willow warblers, Blue tits, Great tits, Cuckoos, Goldfinches, Yellow hammers, Starlings, Song thrushes, Siskins, Redwings, Mistle Thrushes, Kingfishers, Kestrels, Greenfinches, Adders, Grass snakes, Hedgehogs and Badgers.

In the JCS Sustainability Appraisal - C6 Land to the South of Cheltenham, the area was described as, *'intimate rolling landscape, predominantly pastoral with improved and semi-improved pasture. Good hedgerow condition, and good proportion of orchard many displaying old over mature Peary pears. Good number of parkland trees and many veteran oaks along with other species. Small pockets of woodland dotted around the site. Area around Leckhampton displays unusual land use pattern with many small holdings, orchards and allotment/market gardens. Good brookline and associated tree cover. Overall this area displays a good mosaic of habitat types which could make mitigation difficult. The dominant land use is grazing, which has potentially higher ecological value in comparison to more intensively managed agricultural land. The impact of development would be negative'*.

Hedgerows and traditional orchards are listed as Priority Habitats under the UK Biodiversity Action Plan (BAP) and the preservation of these habitats within the site is therefore promoted. The current large scale development proposals would result in the loss of the old orchards and the associated species assemblage of plants and wildlife that has developed over the years. It is therefore recommended that the orchards be preserved and enhanced rather than destroyed and new ones planted elsewhere with the resulting loss of associated ecological features. The site contains numerous species-rich hedgerows and many of the hedgerows are important under the Hedgerow Regulations 1997. The development will result in the loss of several species-rich hedgerows and hedgerows designated as important under the Hedgerow Regulations 1997. The hedgerows contain a mixture of native species of trees and shrubs and provide habitat for foraging and shelter for a variety of species including bats, dormice, woodmice and other small mammals, slow-worms, grass snakes and a variety of bird species, some of which are of conservation concern.

During a LEGLAG bat walk this summer, several soprano and common pipistrelle bats were recorded flying along the hedgerows bordering Lott Meadow and Kidnapper's Lane, a bat roost was found in a mature oak in Lott Meadow. More comprehensive bat activity transects have been undertaken by Hankinson Duckett Associates in 2010 and 2011, which recorded the following species:

- ☐ Common pipistrelle
- ☐ Soprano pipistrelle
- ☐ Noctule
- ☐ Natterer's
- ☐ Whiskered/ Brandt's bats

Most activity was recorded along linear features (hedgerows and tree lines etc.) especially those associated with tree lines/streams running north-south. Noctule and soprano pipistrelle bats are listed as a Priority Species under the UK



Biodiversity Action Plan (UK BAP). The hedgerows not only provide valuable commuting routes for all bat species, but two hedgerows at the western end of the site support non-maternity summer roosts for pipistrelle and Natterer's bats (Hankinson Duckett Associates 2011). As all bat species are protected from deliberate killing, injury and disturbance and their roosts are protected from damage or destruction under Conservation of Habitats and Species Regulations 2010 and Wildlife and Countryside Act 1981(as amended) it is vital that these hedgerows be retained and strong artificial lighting along bat commuting routes be avoided.

The fields contain a number of mature trees, many of which have Tree Preservation Orders, and provide suitable features for roosting bats and therefore the area should be protected from development. For example, during an organised bat walk this summer, a common pipistrelle bat was recorded using one of the mature oak trees in Lott's Meadow as a roosting site. The bat surveys undertaken during 2010 and 2011 by Hankinson Duckett Associates recorded the majority of roosting sites for various bat species in the northern and southern ends of the site. These included:

- A small summer non-maternity roost for Natterer's and pipistrelle bats within ash trees on the north-west and north-east boundaries respectively;
- A small non-maternity summer roost for common pipistrelle bats in the old water tower on the southern edge of Berry's Nursery land adjacent to Lott's Meadow;
- And an unconfirmed noctule roost within trees associated with the Hatherley Brook.
- The badger survey recorded low levels of badger activity within the site and two active badger setts within the western part along Hatherley Brook (Hankinson Duckett Associates 2011). Over half the areas of highly suitable habitat for badgers (i.e. land to the east and west of Farm Lane) are targeted for development in the proposals. Badgers and their setts are protected under the Protection of Badgers Act 1992 and again the area should be protected from development, with longterm protection given to the setts and areas of good foraging habitat in the development proposals.

The reptile survey undertaken by Hankinson Duckett Associates in 2011 reports a maximum count of eight slow-worms on any one occasion within the Leckhampton site, which constitutes a medium population of slow-worms. Local residents have reported one or two slow-worms in the field by the footpath on the east side of Kidnapper's Lane. The highest numbers of slow-worms were located in the north-eastern part of the site where the largest area of highly suitable slow-worm habitat is situated (Hankinson Duckett Associates 2011). However, this area is proposed for development as are other areas of good slow-worm habitat. Considering the limited degree of success of reptile translocations and the length of time needed for other less suitable areas of retained habitat to develop into really good slow-worm habitat, it would be advisable to retain the area of good habitat where the majority of slow-worms were found. All reptile species are protected from deliberate killing or injury under the Wildlife and Countryside Act 1981 (as amended) and slow-worms are a UK BAP Priority Species. It is also possible that the slow-worm population size may have been underestimated as only six instead of the recommended seven surveys were carried out and a proportion of the reptile refugia were constantly disturbed by people, dogs and cattle thereby reducing the likelihood of reptiles using them and hence the number of reptiles recorded.

The wetland areas provided by the two streams and associated vegetation traversing the site provides suitable habitat for grass snakes and amphibians. Grass snake and common toad are Priority Species under the UK BAP, the grass snake is protected under the Wildlife and Countryside Act 1981. These wetland areas also provide some habitat, albeit sub-optimal for water voles, which are fully protected from intentional killing, injury or capture and their places of shelter are protected from intentional or reckless damage, obstruction or destruction under the Wildlife and Countryside Act 1981 (as amended) and they are listed as a Priority Species under the UK BAP.

Several species of birds of conservation concern listed under the RSPB Red List were recorded on the site during the breeding bird surveys undertaken by Hankinson Duckett Associates in 2011, including skylark, song thrush, house sparrow and linnet, as well as 11 species listed under the RSPB Amber List. The loss of the orchards and hedgerows will reduce the available habitat for song thrush, house sparrow and linnet; while the loss of the semi-improved fields will result in a loss of habitat for skylark which require large areas of open space to nest thereby preventing further use of the fields by breeding skylark. While two breeding pairs were recorded within the site (Hankinson Duckett Associates 2011), as progressively more grassland fields are built on across the county and the UK, the available habitat for this declining species is diminishing with negative consequences for their long-term survival. Hence the pressing need to preserve areas of natural green open space such as the fields south of Leckhampton in order for the long-term survival of this species.

In a recent organised dawn chorus walk over the Leckhampton fields with local ornithologists Tony & Frances Meridith on the 11<sup>th</sup> May 2013, the group were amazed to witness four buzzards circling overhead at Kings & Lott Meadow, they have nested in some big oaks by the small holdings or the old Middle Field; this demonstrates the health of the ecology of the area more than any words. Other birds recorded that morning, some of these species are of Conservation Concern, being Red/Amber listed (ref JNCC, BTO, RSPB.2009 - Birds of Conservation Concern 2009, RSPB: Gold Finch, White Throat, Linnet, Black Cap, Jackdaw, Starling, Wren, House Sparrow, Wood Pigeons, Blackbird, House Martin, Swallow, Chiffchaff, Song Thrush, Robin, Grey Heron, Dunnock, Sky Larks, Bull Finch & the ubiquitous Crows & Magpies. Unfortunately it was reported on that walk that Sky Lark nesting sites have been destroyed on White Cross Green, first the grass near the hedgerows had been raked followed by heavy roller; this was not the work of the local farmer, Mr Kincart who uses that field for grazing.

In the DEFRA Biodiversity 2020, a Strategy for England's Wildlife and Ecosystem Services, Caroline Spelman, Secretary of State for Environment, Food and Rural Affairs describes the importance of preserving the environment, the important role of the public and speaks from the heart. *Biodiversity is key to the survival of life on Earth. Its loss deprives future generations of irreplaceable genetic information and compromises sustainability. Government will play an important role but can't deliver this strategy alone. Our conservation charities, supported by millions of members of the public and volunteers, already make a vital contribution in protecting biodiversity. Equally, farmers and landowners have a central role to play as the stewards of England's countryside. We fully recognise the importance of people in helping to arrest the loss of species. We must ensure that the value of nature's services is better understood and enhance people's personal connection with wildlife and nature. Ultimately, conservation efforts can only truly succeed with society's support;* exactly the goals we have set ourselves here in Leckhampton.

One of the actions in the DEFRA Biodiversity 2020 challenge is to setup a completion to support the creation of Nature Improvement Areas <sup>[1]</sup>, this would be an excellent way of Cheltenham getting involved in the programme. Other actions include:

- *Working with key stakeholders to consider how the nature conservation sector can engage the public even more effectively in future and how government might support this.*
- *Getting more children learning outdoors, removing barriers and increasing schools' abilities to teach outdoors.*
- *Establishing a new green areas designation, empowering communities to protect local environments that are important to them.*
- *Helping people 'do the right thing', at home, when shopping, or as volunteers. For example, we will provide funding to support the Big Wildlife Garden scheme and launch a new phase of the MuckIn4Life campaign, offering volunteering opportunities to improve the quality of life in towns, cities and the countryside.*

[DEFRA Biodiversity 2020 para 18]

*We also need to take better account of how much nature does for us. Biodiversity provides a range of benefits to people, but these are often not taken into account in decision-making. This is often because biodiversity benefits are outside the market economy, meaning that they are unpriced and therefore too easily ignored in financial decisions. This strategy therefore draws on the Natural Environment White Paper, and aims to ensure that the value of biodiversity is reflected in decision-making in the public and private sector. Developing new and innovative financing mechanisms to direct more funding towards the achievement of biodiversity outcomes will be a key part of this.*

The key messages from the National Ecosystem Assessment (NEA) are clear; the UK is the first country to have completed the assessment of the benefits of Nature. *'Actions taken and decisions made now will have consequences far into the future for ecosystems, ecosystem services and human wellbeing. It is important that these are understood, so that we can make the best possible choices for present and future generations'.* The comprehensive strategy set out in the DEFRA Biodiversity 2020 report will guide the Local Green Space project and set the objectives.

This Local Green Space, if granted will provide long-term protection of the wildlife, the rich Leckhampton habitat, all the vital biodiversity and maintain the wildlife corridor to the wider vale. Leckhampton has access to hundreds of volunteers, also the close proximity to the Gloucestershire University Park Campus gives research opportunities to really make this conservation project work for the town.

The safeguarding of the habitat & wildlife in Leckhampton is fully supported by UK National Policy and the need to respond to the comprehensive review given in the State of Nature.

#### ***Environmental Initiatives & Policy at the National Level***

##### ***Biodiversity 2020:***

##### ***The Challenge for Local Authorities and Public Bodies***

*Recognising that a healthy, well functioning natural environment is the foundation of sustained economic growth, and that society cannot flourish without the benefits and services our natural environment provides, the government is striving to put the value of nature at the heart of decision making – in government departments, local authorities, communities and businesses.*

*In June 2011, the Department for Environment, Food and Rural Affairs (Defra) published the Natural Environment White Paper (the first on the natural environment for over 20 years), a radical vision outlining the government's plan for the next 50 years – along with practical proposals to realise these ambitions.*

*Building on the Natural Environment White Paper and published shortly after – 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' has at its core the objective to stop overall biodiversity loss. It also hopes to support healthy well-functioning ecosystems and establish coherent ecological networks, leaving more and better places for nature, benefitting wildlife and people alike.*

*Crucially, local authorities and other public bodies have an important role to play in conserving biodiversity. This was underpinned by a 'Biodiversity Duty' which was introduced by the Natural Environment and Rural Communities Act.*

***- Caroline Spelman, Secretary of State for Environment, Food and Rural Affairs, August 2011  
In the Government Report – A Strategy for England's wildlife & ecosystem services, DEFRA  
"In October 2010 in Nagoya, Japan, over 190 countries around the world reached an historic global agreement to take urgent action to halt the loss of biodiversity. This agreement recognised just how important our wildlife and ecosystems are for sustaining a healthy planet and for delivering essential benefits for people... Biodiversity is key to the survival of life on Earth. Its loss deprives future generations of irreplaceable genetic information and compromises sustainability... This strategy provides the national framework for action to help us collectively achieve our goals. We need to work together, in partnership, to put this into practice, for the sake of England's wildlife, but also for ourselves and for future generations."***

*In our recent Natural Environment White Paper we responded to Sir John Lawton's call for a more integrated landscape-scale approach. We need to build a wider network of places across England which enable wildlife to thrive and natural processes to be sustained, alongside other land uses such as farming. This will help nature to better withstand future pressures such as climate change – and set our continuing conservation efforts for particular important species into a wider context.*

A ground breaking UK report published in May 2013, entitled, 'The State of Nature'<sup>[8]</sup> by a coalition of leading conservation and research organisations. Scientists working side-by-side from 25 wildlife organisations have compiled a stock take of our native species, the first of its kind in the UK. The State of Nature report reveals that 60% of the species studied have declined over recent decades. Detailed evidence collated in the study show, *'more than one in ten of all the species assessed are under threat of disappearing from our shores altogether. We*

*have quantitative assessments of the population or distribution trends of 3,148 species. Of these, 60% of species have declined over the last 50 years and 31% have declined strongly'.*

The report describes the impact on species, *'of more than 6,000 species that have been assessed using modern Red List criteria, more than one in ten are thought to be under threat of extinction in the UK. A further 885 species are listed as threatened using older Red List criteria or alternative methods to classify threat'.*

Dr Mark Eaton, a lead author on the report, said: *'This report reveals that the UK's nature is in trouble - overall we are losing wildlife at an alarming rate'.*

The State of Nature report was launched by Sir David Attenborough and UK conservation charities at the Natural History Museum, *'this report shows that our species are in trouble, with many declining at a worrying rate. However, we have in this country a network of passionate conservation groups supported by millions of people who love wildlife. The experts have come together today to highlight the amazing nature we have around us and to ensure that it remains here for generations to come.'*

In the forward to the report, Sir David talks about how local groups can make a difference, *'although this report highlights what we have lost, and what we are still losing, it also gives examples of how we – as individuals, organisations, governments – can work together to stop this loss, and bring back nature where it has been lost. These examples should give us hope and inspiration'.*

But as a society why should we care, losing a few species matters little in the wider scheme, after all it is Darwin's natural selection at work as the human population increases. Surely getting the UK economy back on track has to trump any short term concern for the environment, houses on Leckhampton could boost the local economy and certainly equate to profits for an ailing construction industry.

To answer this question it is useful to look at the international picture on environment and how scientists are seeing the strong economic links to environmental issues, consistent with DEFRA's 2020 Biodiversity Strategy.

In a similar piece of research to the UK's State of Nature, the International Union for the Conservation of Nature (IUCN) took a 50,000 species sample, this represents 3% of all species of animals and plants on Earth. Professor Antony Barnosky of the University of California in Berkley and Georgina Mace, Conservation Biologist at Imperial College London summarise the findings, *'40% of this sample are threatened by extinction and have been red listed, that is those species which are in long term progressive decline or where a species are restricted to small areas and/or have small populations. Currently we have an estimated 3 to 12 times the extinction rates compared to background rates and could be as much as 80 times background rates. The rising curve of extinction rates depends on what we do in the next few decades.'*

The growing human population is taking habitat for food production. Agriculture in the form of farms and ranges now accounts for 40% of the land. Professor Paul Ehrlich, Stanford, taken from the transcript of the BBC Radio 4 Programme on Ecology - *'population extinction virtually always precedes species extinctions, most species occur as a wide variety of populations in different places, often evolutionally different populations and what we are doing right now are wiping out huge numbers of populations and we don't get the same level of species extinctions until we get to the end of the line on each one. So if there is a thousand populations in a species it takes time to wipe out all thousand of them before you've lost the species.'*

*'The way to see that population extinctions are crucial is to realise that if you could wave a magic wand and say every species on the planet would be preserved as one viable population for the rest of eternity, then the species extinction crisis would be over ... right? and we'd all be dead in a few months because we absolutely depend on*



*a wide variety of populations that run the ecological systems, the eco systems that are supporting our lives. For example, in the US something like 20 billion dollars a year in our agriculture production depends on pollinators. So when you have a collapse on your bee populations that's going to affect your pollination and hit your economy. Now if we had one population of honey bees in Italy that wouldn't do a dam thing for pollinating crops in north America. If you had only one population, say of birds of paradise that wouldn't do much for New Guinea's tourist industry because you need lots of populations so you can get people out to see them. All the things that we basically want to get from nature with very trivial exceptions depend on having various populations, often large numbers of populations.'*

So from a practical point of view Prof. Paul Ehrlich suggests that historically many conservationists have been focused too much on protecting individual charismatic species and missed the bigger picture ... *'Much more important to us are pollinators and organisms that make our soils fertile and the plants that absorb the carbon dioxide that we are putting too much into our atmosphere and screwing up our climate and so on ... I think the main thing we should be done differently is to inform the public much more about the eco systems services, so they are quite happy to put political support and financial support into protecting entire eco systems. So we should be putting effort into protecting the charismatic species and gigantically higher effort into protecting the systems and populations. Because, you know, you get some jerk sitting in a Wall Street office who knows nothing about the world and he says why in hell should I protect the pandas. I'm never going to see a panda, I don't care about pandas, the only thing I care about is boozing and stealing people's money, typical Wall Streeter! But, if you say if you don't protect the eco systems you're not going to have any food, you're going to starve, then you can get your message across.'*

*'We have a built in audience with self interest in saving the eco systems and the populations, we only have a relatively minor proportion of humanity that really cares about the polar bears, that really care about pandas, that really care about beautiful birds and so on ...'*

Do we have a moral responsibility to protect species and habitats?

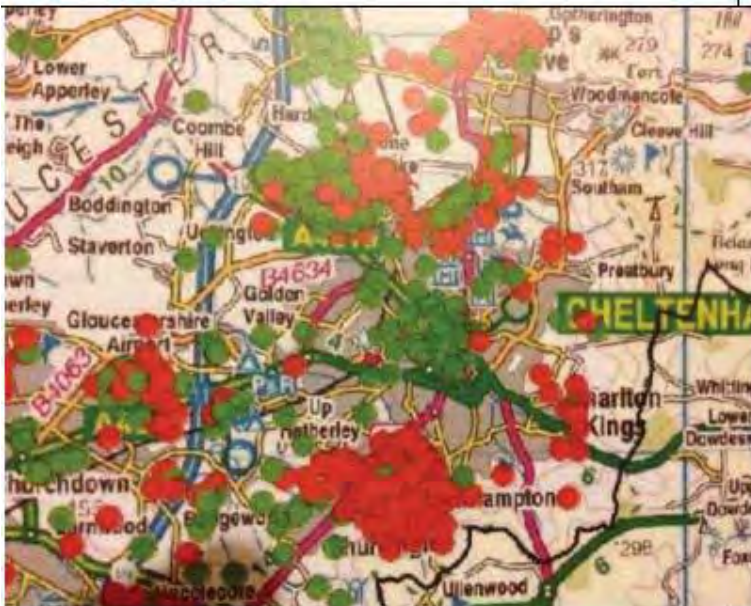
Prof. Paul Ehrlich again, *'humanity is carrying out a vast campaign of sawing on the limb it's sitting on, and the limb we are sitting on of course is all those populations of other organisms that support our lives, so what's more or less certain is, it's deeply stupid, so if you don't have a moral feeling about it then think: don't you want to belong to a species that acts intelligently rather than stupidly?'*

### 3.4 MATERIAL REASONS FOR AVOIDING LARGE SCALE DEVELOPMENT IN LECKHAMPTON

The recent JCS Sustainability Analysis, considers the land south of Cheltenham at Leckhampton, the report concludes ...

Table 1 JCS Sustainability Analysis – Leckhampton (Part of C6)

Summary Conclusion	Traffic Light Signal
'The broad location contains sites of biodiversity value'	RED
'Development of the site would be likely to lead to the fragmentation of important habitats'	RED
'The area displays a good mosaic of habitat types which could make mitigation difficult'	RED
For overall biodiversity impact, the site shows 'intimate rolling landscape, predominantly pastoral with improved and semi-improved pasture. Good hedgerow condition and good proportion of orchard ... good number of parkland trees and many veteran oaks along with other species. Small pockets of woodland dotted around the site. Area around Leckhampton displays unusual land use pattern with many smallholdings, orchards and allotment/market gardens. Good brookline and associated tree cover'	RED
It gives no rating, bizarrely, for climate change mitigation despite the obvious fact that loss of an overwhelmingly greenfield site would clearly have a major carbon impact, saying 'this objective is not assessed as part of the broad locations SA'	
It gives a GREEN rating on flooding despite the area's 3a rating from consultants Halcrow and the wide local knowledge that this land floods regularly	GREEN ?
It gives no rating for landscape sensitivity despite concluding that <i>'the overall landscape sensitivity considered to be high' with 'an impression of a well wooded landscape' and 'a large network of hedgerows most of which are well maintained'</i>	
The JCS appraisal concludes that 95% of the site contains high grade agricultural land, it's a puzzle as to why only but only a GREEN/AMBER rating is given.	GREEN/AMBER
It gives no rating to archaeological significance despite reporting a 'scheduled ancient monument at Leckhampton'	
In the JCs Public Consultation events, the public were asked to place RED (no development) and GREEN (development) stickers onto the town map, the result below was a typical result of the public trying to protect green space close to the Urban area.	RED



The Sustainability Analysis reports health impact only in terms of proximity to the nearest GP surgery. The natural benefits of green space to mental and physical wellbeing and the potential reduction in health inequalities <sup>[MIND]</sup> from free access to green space and recreation are not accessed. This results in an **AMBER** rating, given for other reasons.

Looking at the more critical questions asked about the value of the green space at Leckhampton:

Section 16 of the JCS Sustainability Analysis of Leckhampton, covering Green Space to Land to the south of Cheltenham (C6) of JCS Sustainability Analysis - (p118 of 171 in Appendix 1); critical questions have yet to be answered:

- 16a Does the location provide the opportunity for access to the countryside and natural environment? Yes/No
- 16b Does the site contains strategic open green space? Yes/No
- 16c Will it ensure existing open spaces are protected and enhanced? Yes/No

The feedback from the public in the JCS Consultation has been consistent and overwhelming on the value of Leckhampton Green Space. Thousands of petition signatures, marches, packed local meetings, hundreds of detailed submissions to the Joint Core Strategy consultation and before that numerous RSS consultations and local planning inquiries over 20 years from members of the public and representations from parish councillors, borough councillors, county councillors and MPs of all colours. The answer to these Green Space questions on Leckhampton must surely be YES, with a rating of **RED**.

In conclusion, this appraisal of the open countryside in Leckhampton within the JCS Sustainability Analysis provides good support to the NPPF Local Green Space application.

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#### 3.4.1 TRAFFIC CONGESTION & POOR AIR QUALITY ON THE SHURDINGTON & CHURCH ROADS

Probably the biggest issue for sustainable development in the Leckhampton area is the traffic congestion on the A46 and in Church Road. According to the Gloucestershire Local Transport Plan 2011-2026 (LTP3), workday traffic flows on the A46 are 15,000-20,000 vehicle a day. In the maps on pages 24 and 25 of LTP3, the A46 south of Shurdington is marked as being the worst congestion hot-spot in the Cheltenham-Gloucester area in 2003 and is shown as remaining a severe congestion hot-spot in 2026.

The traffic flow on the A46 is quite high throughout the day, but the major congestion occurs in the workday morning traffic peak between 07:30 and 09:15, when a traffic queue builds back from the junction with Moorend Park Road. This queue extends about 1.2 km, varying between 1.0 km and 1.4 km under normal conditions depending on the level of traffic. There is also traffic congestion in Shurdington caused particularly by vehicles queuing to turn right into Leckhampton Lane at the Bell Inn junction.

A preliminary estimate by Leckhampton with Warden Hill Parish Council in February 2013 suggested that if all of the currently proposed housing developments went ahead the traffic queue could extend beyond the A417 junction (a queue length of 5.3 km). To make a more detailed assessment of the scale of the problem, the Council has carried out 35 traffic surveys to date on different days during the peak traffic period. These have covered all of the main junctions along the A46 from the A417 roundabout to the Moorend Park Road intersection and they have also included surveys in Church Road, Leckhampton Lane and Farm Lane near the Lanes Estate. The surveys also included timing the journey times along the A46 between junctions over several

mornings during the peak traffic period in order to model the traffic speed and vehicle spacing as well as the traffic flow.

The modelling and analysis from the traffic surveys is included at Annex 3 and the implications for sustainable development in Leckhampton are discussed in Annex 2. The approach used for the modelling and analysis has been independently verified by traffic consultant Rob Williams, a director of Entran Ltd and well respected by Mark Power of Gloucestershire Highways, from whom the Council has also received valuable advice.

The findings from the traffic modelling are alarming for Cheltenham as well as for the parishes. The traffic model allows a wide range of scenarios to be examined. It indicates that if all of the development currently proposed were to proceed, including the proposed housing at Brockworth, the A46 traffic queue would reach the A417 by around 08:30 and would spread along the A417 and onto the M5. If just the proposed development at Leckhampton were to go ahead, the queue would still reach the A417, and if one also includes the increases in traffic between now and 2025 projected by the Department of Transport (“Action for Roads”, July 2013, ISBN: 9780101 867924, [www.gov.uk/dft](http://www.gov.uk/dft)) the queue would again be likely to reach the M5. Even if the development were reduced so that the queue did not quite reach the A417 junction, the model shows that the time it would take to commute into Cheltenham would impose a great economic cost and would make it hard for people living south of the A417 to work in Cheltenham.

Even tighter constraints are imposed on sustainable development by two other factors discussed in Annex 2:

1. the need, confirmed by Mark Power, to prevent any major increase in traffic levels on Church Road during the morning peak period
2. the pollution levels on the A46, particularly around the Moorend Park Road intersection, which exceed permitted EU levels.

These two factors lead to the conclusion that there is no scope for any sustainable development on the Leckhampton Green Field Land, particularly taking into account the rise in traffic levels now projected by DfT. LWWH PC has also looked at the various proposals for new employment sites around Cheltenham being considered by the JCS to check that these do not materially alter this conclusion.

The findings from the traffic survey and analysis are a serious warning, particularly for the JCS, about the importance of taking a holistic approach to the future of the Gloucester-Cheltenham-Tewkesbury area and to the competitiveness of the local economy. A point that is emphasised by DfT in “Action for Roads” is the vital importance of husbanding the traffic network and the risk that many people will become unable to work because of growing traffic congestion. DfT observes that in a highly competitive world, the compactness of the UK should be a strong competitive advantage because of the shorter travel distances, but that it could easily become a weakness due to congestion. Whilst cities such as London are seeing a reduction in car use thanks to public transport infrastructure, areas such as Cheltenham and Gloucester that are very car-dependent, are particularly vulnerable, both economically and socially.



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### 3.4.2 FLOOD RISK TO WARDEN HILL & THE LECKHAMPTON LANES

The JCS evidence base has provided valuable information on the increasing flood risk to the Leckhampton area and is in agreement with surface flooding experienced by residents in recent decades.

The Gloucester, Cheltenham & Tewkesbury Joint Core Strategy Level 2 Strategic Flood Risk Assessment, HALCROW Summer 2011, report extract covering the Leckhampton area:

- *Significant surface water runoff is generated from the area to the south*
- *Areas of historic flooding identified outside the modelled flood risk areas*
- *Two key risk areas identified along Hatherley Brook (upstream Church Road & rural land adjacent to eastern branch), a number of existing roads affected by flooding*

Hatherley & Ham Brook in Leckhampton identified as higher flood risk, a hydraulic model of Ham Brook is required, significant surface water runoff and an area of historic flooding, highways are also affected. The Halcrow report again, *'where historical records show incidents of flooding and surface water, then these areas should be treated as Flood Zone 3a; at risk and not suitable for development. Areas of existing open space acting as informal flood storage areas should be safeguarded from development'*, the open fields at Leckhampton provide important protection of areas to the west of the Shurdington Rd from flood risk due to surface water. In general Halcrow state that, *'areas of existing open space acting as informal flood storage areas should be safeguarded from development'*.

This is the case in Leckhampton where open land is protecting Warden Hill where flooding has been a serious problem, a minimal flood protection scheme has been put in place on a small section of the Shurdington Road, it is worth noting that all proposed new development is on the other side of this barrier. The area of open countryside adjacent to the flooded area provides important protection to the wider area of Leckhampton Lanes & Warden Hill.

Halcrow again, *'in some areas high hazard surface water risk areas affect locations outside of Flood Zones 2 and 3. Such areas should be treated as Flood Zone 3a with regard to the Sequential Test process'*, the heavy clay soil at Leckhampton regularly floods due to water run-off from Leckhampton hill.

A water survey had been completed from the 5th Nov. 2006 to the 17th Nov. 2006, this had been combined with an archaeological survey. Residents spoke to the team of university archaeologists and have a photographic record of the survey work conducted on behalf of David Wilson Homes & Martin Dawn PLC. Most of the 20m x 4m trenches (14 in number) were for a geological/water survey, confirmed by the archaeological team at the time and were marked 'water' with wooden stakes to differentiate from the three archaeological trenches.

David Wilson Homes & Martin Dawn PLC did not report the findings of the survey carried out in 2006, which would have confirmed a very high level of water table and wetness class for the majority of the proposed site caused by Infiltration from Leckhampton Hill. This whole area along Church Road (formally Collum streete) has had problems with flooding, with tithing records dating back to medieval times due to the close proximity of Leckhampton Hill.

### 3.4.3 LANDSCAPE AND VISUAL IMPACT OF LARGE SCALE DEVELOPMENT IN LECKHAMPTON & SHURDINGTON

The development of the Strategic Housing Location to the SW of Cheltenham covering the Leckhampton White Land within the Cheltenham boundary (1,300 dwellings) and the adjacent Farm Lane site in Tewkesbury BC (350 dwellings) would conflict with both the Local Plans and the National Planning Policy Framework and would have a significant adverse impact on the adjacent Cotswolds AONB and its setting.

On the JCS proposed policies, the choice of the Strategic Housing Location to the SW of Cheltenham for development in Phase 1 (2011 – 2021) of the proposed JCS conflicts with the AONB constraints policy which is also one of the Strategic Objectives in Developing the Preferred Option of the JCS. Under Strategic Objective 4.5 *"Conserve and improve the natural environment"*, is a clear policy including the Cotswolds AONB as part of the JCS's unique natural environment and great biodiversity. Para 3.12 of the local authorities' vision for developing the JCS Preferred Option highlights the way Cheltenham's development pattern is encompassed on all sides by the Cotswolds AONB and the Green Belt, and, significantly, states *" – The setting of Cheltenham is derived from its location at the edge of the escarpment ..... "*. In choosing as a Strategic Housing Location the Leckhampton White Land plus Farm Lane, both areas immediately on the border of the Cotswolds AONB, and physically at the foot of the escarpment, the local authorities' claim that they have avoided areas of *"high landscape value"*, clearly conflicts with the JCS Strategic Objectives 4.5. In para 5.27 the local authorities admit that *"the AONB presents a strong environmental constraint"*, but nevertheless their preferred Option disregards this constraint in its choice of the Leckhampton White Land, with Farm Lane, as a site for major housing development in the JCS.

Looking now to National Policies. The southern boundary of the Leckhampton White Land abuts the Cotswolds AONB, an extensive area designated in 1966 and extended in area in 1990. The primary purpose of AONB designation is to conserve and enhance the natural beauty of the landscape. The Cotswolds AONB Conservation Board was established in 2004, and in addition to the purpose of conserving and enhancing natural beauty, is also charged with increasing the understanding and enjoyment of the special qualities of the AONB. One of the most significant features of this landscape, generally acknowledged as one of England's finest, is the dramatic west facing escarpment overlooking the Severn Vale, a factor already mentioned in the JCS. This escarpment immediately overlooks the Leckhampton White Land and Farm Lane.

Strong policy in the National Planning Policy Framework (NPPF6) retains rigorous protection for AONBs. Given the location of the Leckhampton White Land and Farm Lane site as an integral part of the setting of the Cotswolds AONB, the strong national policies for protecting AONBs should be taken into account in the framing of the JCS.

Local Plan Policies in the Cheltenham Borough Council Local Plan – Second Review (Adopted July 2006) cover the larger Leckhampton White Land part of the Strategic Housing Location and clearly refer, in Policy C02, to *"Development Within or Affecting the AONB"*. In the paragraphs of the Plan supporting C02, para 7.21 should be quoted – *"Development on sites outside but close to the AONB can also have an impact on its character. Such development should be designed and landscaped to avoid harming the natural beauty of the AONB. Special consideration should be given to the impact of proposals on the setting of the AONB and on views into or out of the area ..... "*. The previous para (7.20) also underlines points made in the JCS (see para 5 above) concerning the need to protect the Cotswold escarpment as the dominant feature of Cheltenham's setting. Para 7.21 of the Local Plan has been disregarded in the JCS *"Developing the Preferred Option"*.

The Inspector's 2009 Report into the proposed Cheltenham Local Plan, and his specific comments on the value of the Leckhampton White Land, should also be considered. In this Report he set out his view that the southern part of the White Land was an important part of the setting of land in the AONB. Para 7.22 says *"In assessing proposals for development, the Council will be guided by the advice of the Cotswolds AONB Conservation Board ..... "* while para 7.23 clearly states 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"*.

The Tewkesbury Borough Local Plan9 (2006 – 2011 adopted March 2006) policies cover only the smaller, west of Farm Lane, part of the Strategic Housing Location. While the Plan includes a range of policies (Policy LND1)

relating to the extensive areas of the Borough within the Cotswolds AONB, these policies did not cover developments on land outside the AONB, but within its setting. Given the Inspector's 2005 Report on the Borough Plan (see para 13 below) that the land adjacent to Farm Lane at Brizen Farm was an attractive area of countryside important for the setting of the AONB, this omission of any Plan policies relating to the AONB setting was surprising. However, despite this omission, it is clear that since October 2008, when Tewkesbury BC (para 17 below) resolved to take the Cotswolds AONB Management Plan into account in planning matters, the Borough Local Plan has been required to take the setting and surroundings of the AONB into consideration in the determination of planning applications.

As mentioned above, the Inspector's Report (2005) on the Tewkesbury Borough Local Plan, in its comments on the inclusion of the Brizen Farm area (immediately to the north and west of the Farm Lane area, adjacent to the AONB, and also overlooked by the Cotswold escarpment) points out that development at Brizen Farm *"would entail development that would be visually prominent in the foreground views of the AONB escarpment from the A.46 ....."* and *"would extend urban development into an attractive area of open countryside that is important for the setting of the AONB and the approach to Cheltenham ..."*. The Inspector believed that the Plan proposal to concentrate development in the eastern and central parts of the Brizen Farm site would not mitigate the visual impact to any significant extent, since it would have been prominent in the foreground of attractive views towards the foothills of the AONB. He argued that, notwithstanding its suitability in other respects, Brizen Farm was not an appropriate (Plan) allocation for new housing. The Inspector's conclusion on Brizen Farm, adjacent to the Cheltenham SW Strategy Housing Location, and clearly part of the AONB setting, has again been put aside in the JCS Preferred Option.

Again, given the reference, in para 16 below, to the Cotswolds AONB Management Plan<sup>10</sup> (2008 – 13) it has already been noted that Tewkesbury Borough Council Planning Committee (for Tewkesbury BC), on 7 October 2008, endorsed the Management Plan, and subsequently resolved that the Plan be taken into account in the preparation of the JCS and in the determination of planning applications.

The Cotswolds AONB Conservation Board Management Plan (2008 – 2013) has been adopted for guidance by both planning authorities involved in the proposal to make the *"Leckhampton White Land – Farm Lane"* site a JCS Strategic Housing Land Location. A key issue in this Plan is LK3 *"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 (PPS7) to ensure that they conserve and enhance the natural beauty and landscape character of the AONB"*. Expanding on the issues raised on development affecting the setting of the Cotswolds AONB, the Conservation Board have produced a Position Statement 11 *"Development in the setting of the Cotswolds AONB"*. This Statement also refers to a number of appeal decisions where the setting of an AONB (or a National Park) have been an issue in final decisions on planning applications by Inspectors or the Secretary of State.

The Landscape and Visual Appraisal of Land at Farm Lane / Church Road, Leckhampton, Cheltenham (the Leckhampton "White Land") Final Report, July 2003, by Landscape Design Associates (LDA), was the first, and many would argue, the definitive, appraisal of the overall value of the landscape of the area now under consideration as a strategic housing location, and of its sensitivity to change and/or development. Significantly it was commissioned by Cheltenham Borough Council, to inform the then ongoing review of the Cheltenham Local Plan, which included the exploration by the Council of the potential for additional protection of this Leckhampton White Land. Landscape Design Associates' Report followed a desk-based assessment of existing environmental information and a period of field-based landscape and visual survey, using methodology broadly in accordance with the now widely-used "Guidelines for Landscape and Visual Impact Assessment" published jointly in 2002 by the Landscape Institute and the Institute of Environmental Management and Assessment. For the purposes of this statement I shall only quote the all-important conclusions to the Report, and their relevance to the current JCS proposals and consultation. It is essential that the full report is again considered by the JCS authorities and their officers. Although written in 2003 its content and conclusions are still very relevant today. The LDA report forms Appendix 1 to this statement.

Its conclusions are therefore quoted, in full: *"The landscape character and value of the study area derives from the strongly rural and largely unspoilt character of the landscape, the condition and diversity of the existing*

*landscape features, the relationship of the landscape with historic buildings and features, the character of the local lanes, the visual prominence of the landscape in views to and from the AONB, and the contribution the area makes to the setting of Leckhampton Hill and the character of the main gateway into Cheltenham from the west. It represents a valuable and sensitive landscape which is well used by local people as an area of countryside close to the urban area within which large scale development could be visually intrusive and adversely affect views to and from the Cotswold AONB. Whilst the site could accommodate small scale change and development, it is considered highly vulnerable to the effects of large scale development. The protection of the landscape should therefore continue to be the primary objective."*

#### 3.4.4 PREVIOUS INSPECTORS REPORTS & ENQUIRIES

Four inspectors have rejected large scale development on the Leckhampton white land in recent time, to quote Inspector David Asher, *"development of the objection site would materially harm the rural character and appearance of the area, and the important contribution that this makes to the landscape within the site and when seen from the AONB, the rural character up to the edge of the town which would be lost if development were to take place"* - CBC Local Plan Second Review to 2011 Inspector's Report.

**Table 2 – Recommendations from Previous Inspectors looking at large scale development in Leckhampton**

Enquiry	Ref	Extract
Cheltenham Borough Local Plan Inquiry (1993) - Inspector's Report <a href="#">Cheltenham Local Plan Inquiry (1993) - Inspector's Report</a>	6.92	The land at Leckhampton should be protected for its special historical, landscape and amenity value. It represents the last example of the gradual transition between the urban area and the countryside which characterised the Regency town. It should be considered anew for green belt or AONB status, for 'landscape conservation area' status, and as part of a Leckhampton Conservation Area (35A, 129W).
	6.95	The land at Leckhampton continues to be farmed with no indication of decline. The structure plan says that development which leads to additional traffic on Bath Road will be resisted, as improvements would be damaging to the environment. The present sewerage system cannot accommodate even limited development on the Leckhampton land, and the Hatherley Brook is loaded to capacity.
	6.97	The land at Leckhampton was originally omitted from the green belt with the proviso that the green belt notation might be extended if it appeared at a later date that it should remain open in the long term. The CELP [Cheltenham Environs Local Plan] Inspector concluded that the principles which guided the planners in 1968 applied equally in 1984, and that the land should not be green belt, but should remain open. I have had the benefit of new evidence concerning the character, appearance and historic interest of the land. I have walked over it and examined it from Leckhampton Hill, and reached my own conclusions on its merits. I have also examined Swindon Farm, which the CELP inspector was not asked to do. The GSPFA [Gloucestershire Structure Plan First Alteration] with its strategy of restraint, in great contrast to the high level of development which occurred in the 1980s, was approved only recently (in 1992). In my opinion these are material changes, which have occurred since 1984, in the circumstances surrounding the question of longer term development in Cheltenham.
	5.100	I believe that it would be very sad indeed if development were to



		proceed at Leckhampton, with its variety and interest.
	6.103	The land at Leckhampton appears from the latest available classification (MAFF 1) to be a mixture of Grade 2, 3a and 3b. Although not of the highest quality, the land is in my opinion sufficiently valuable for this factor to be given some weight if it ever becomes necessary to consider whether the land ought to be released.
	6.104	The Structure Plan supports the council's contention that Bath Road does not have the traffic capacity to support further development. There is insufficient evidence for me to draw conclusions about the drainage question: there is, at the least, serious uncertainty. Whether these constraints might be overcome in the longer term is not a matter which I need to address. However, they seem to me to be of such importance, and to have implications for such a wide area, that it is reasonable to conclude that the land at Leckhampton would need to be the subject of comprehensive development proposals if it were ever to be developed, as the council suggest. In the meantime, it should in my view continue to be protected from development.
Tewkesbury Borough Council Local Plan To 2011 Report Of Public Local Inquiry Into Objections PINSM/G1630/429/5 December 2003 - Mary Travers Ba(Hons) DipTP MRTPI - The Planning Inspectorate. <a href="#">Tewkesbury Borough Council Local Plan To 2011 Report Of Public Local Inquiry Into Objections PINSM-G1630-429-5 December 2003 Mary Travers.pdf</a>	2.25.11	The site consists of four fields subdivided by substantial hedgerows that are interspersed with hedgerow trees. It has a gently rolling, topography and an attractive pastoral character that in my view links strongly into the landscape of the AONB immediately to the south of. Leckhampton Lane. Generally the contours fall from south to north and from east to west and there is a distinct ridge running roughly northwest-southeast through the site- -so that the south-eastern corner is the most elevated part. A public footpath that traverses the northern part of the site forms a link in a network of rural paths to the east and west of the site.
	2.25.12	As can be observed from public vantage points, the site is highly visible from within the AONB, for example from the lower slopes of Leckhampton Hill and from higher up at the Devil's Chimney. It is also visible partly from the west and in long distance views from the north. There is a substantial hedgerow on the western boundary with the Green Belt but this area drops away towards the Vale of Gloucester As a result, development on the more elevated south-eastern part of the site would be very conspicuous from the western approach along Leckhampton Lane where it would be seen within the context of the AONB. And looking southwards from the public footpath across the site it is apparent that development would. entail a significant intrusion into views of the open countryside and the AONB from the existing edge of the built-up area. It would also sever the link between the rural footpaths to the east and west of the site and replace it with one of an entirely different character. For these reasons and taking into account the scale of the proposed development, I consider that its visual impact on the surrounding countryside would be very significant and that it could not be easily mitigated.
	13.0	In addition, the site forms part of a swathe of open land that sweeps down from the Cotswolds to pass between Cheltenham

		and Gloucester and it provides a link between the AONB and the Vale of Gloucester. Development of the site would form an incongruous promontory in this open area, eroding the link and cutting off the rural land to the east of Farm Lane from the tract of countryside to the west. I do not consider that there are any differences in character or appearance between the Cheltenham Borough safeguarded land and the SH1 site that are so significant as to render this incursion less harmful.
Cheltenham Borough Local Plan Second Review 1991-2011 Inspector's Report, pp 187, DP527 8 March 2005 David Asher BA DipTP MRTPI. <a href="#">Cheltenham Borough Local Plan Second Review 1991-2011 Inspectors Report pp 187 DP527 8 March 2005 David Asher.pdf</a>	10.147	I conclude on this issue, therefore, that the development of the objection site would materially harm the rural character and appearance of the area, and the important contribution that this makes to the landscape within the site and when seen from the AONB.

An important part of the JCS Evidence is the Entec/AMEC Greenbelt Review, May 2011, this report recommended consideration of land to the south of Farm lane, Leckhampton, be incorporated into the Green Belt and marked it RED –no development. The updated JCS AMEC Greenbelt report, Sept 2011, reinforced this view, *“land to the south of Cheltenham (south of Leckhampton, SW of Farm Lane) having the strongest case”*; the strongest case for additional Greenbelt in the wider JCS area.

This Local Green Space, if granted would prevent the constant land speculation and expenditure of public money in the defence of this open countryside. It would also provide the vital stability necessary for investment, allowing longer term leases on the glebe smallholdings and investment in local food production; sustainable projects like zero carbon hydroponics and renewable energy. Various funding options for a city farm are being explored including the Big Lottery Fund and the Prince’s Countryside Fund.

### 3.5 WHAT A LECKHAMPTON LOCAL GREEN SPACE MEANS TO THE COMMUNITY AND TOWN

Local Green Space is a new designation contained in the NPPF for the protection of locally important green space and stresses the importance of locally derived standards. The Localism Bill also reflects the importance currently attached by Government to decisions being made locally and based on local information. The local community of Leckhampton abuts the green space, which provides a much treasured source of recreation for a variety of residents from families with small children, simply walking the dog to dedicated ramblers and nature lovers who follow the numerous footpaths through these fields.

The area concerned is of extremely high value to the local population and in recent years over two thousand local residents signed a Petition to protect the (Leckhampton) land from inappropriate development and to make the land into a "Country Park". This petition was well received by Cheltenham Borough Council and Tewkesbury Borough Council, see panel.

Thursday, 10th November, 2011, Leglag Country Park Petition submitted to full Council

Response from the Leader, Cllr Steve Jordan

*Cheltenham Borough Council takes the issues raised in the petition very seriously and the resolution I am proposing to Council this afternoon restates the intention to protect Green Belt and open countryside around Cheltenham. Assuming the 3 Councils confirm agreement to start the consultation, the issues raised in the petition will no doubt feature in the feedback from LEGLAG and others.*

**In a follow-up members question on the Leglag Country Park Petition to Cheltenham Borough Council, Monday, 13th December, 2010** *'The Cabinet Member responded that he was fully supportive of the LegLag aims for this area and would do everything possible to assist them'.*

The term "Cheltenham Park" was intentionally not fully qualified/explained, as this was left open for discussion with local people and other stakeholders. However, it could envisage some development but of a form consistent with a park, and improving the beauty of some of the fields and streams. It also envisages maintaining a country feel.

The Country Park is a good basis for the Neighbourhood Local Green Space application, since it is already favoured by the local people. This would incorporate alternative uses for the land such as a city farm where children and adults could view traditional farming practices. This would be an extension of the existing small holdings where sheep, chickens, pigs, goats and small breeds of cattle are kept. There could be displays of how wool is obtained from sheep, milk and eggs are gathered and maybe local cheese (and meat) production. The orchards within this area could be enhanced and better managed to increase fruit production which could be harvested as PYO by the local community. Bee-keeping could be instated which would provide pollinators for the orchards which would in turn provide the bees with a food source from the fruit tree blossoms among other wild flowers in the area. This would also provide a much sort after product – local honey. In addition to the city farm, a tie-in with Gloucestershire University using some land for hydroponics to grow local food efficiently and show people how this can be achieved. As the green space supports a wealth of wildlife, it is also envisaged that circular walk routes could be published to guide people to the best flora, fauna and stream lines in the area. Bat and dawn chorus guided walks have taken place, organised by local residents, these have been well-attended and there are plans for further wildlife events in the future.

Some financial backing would be required to give return to the land owners, and various possibilities could be found once the Country Park/Green Space application is given the opportunity to go forward, this may result in some development. There are other possible paybacks apart from the food production already discussed, for example renewable energy, educational projects, organised events and agricultural research while maintaining a local green area and the Country feel.

Two Town & Village Green applications have been submitted to the Gloucester County Council, detailed in the maps of Appendix 1, both have received the maximum scoring against the assessment criteria. These are Lott Meadow & White Cross, the latter being the best candidate for an extension to the greenbelt in the JCS area <sup>[1]</sup>.

The Shurdington Rd and Leckhampton is one of the main gateways to the Regency Town of Cheltenham, and a green environmental feel to the area can only enhance Cheltenham as a favoured tourist destination. The JCS Sustainability Appraisal states that, *'Land around Leckhampton is particularly well connected to the urban centre'*, thereby meeting an important NPPF criteria for Local Green Space and partly explains why the area is so well used and much loved by Cheltenham residents.

The Local Green Space will give permanent protection to Leckhampton land that is used by the public for recreation. These comprise Lotts Meadow between Kidnappers Lane, White Cross, Burrows playing fields, the fields between Kidnappers Lane and Farm Lane that are crisscrossed by public footpaths. Lotts Meadow is heavily used for recreation all year round by people in and around the parish. The fields between Kidnappers Lane and Farm Lane are less heavily used, partly because the footpaths have stiles rather than gates. But these fields are important for preserving the old rural part of Leckhampton Village and the view from Leckhampton Hill. The Cheltenham Circular Path runs through this land. Many of the stiles have now been replaced with the modern swing gates making the fields more accessible.

The 'country park' would include allotments. The land between Kidnappers Lane and Farm Lane should remain more or less as it is now. The 'country park' should extend west of Farm Lane and include White Cross and the green belt land. It is important not to build housing on the land west of Farm Lane as this would substantially reduce the appeal of the 'country park' for securing the investments needed.

In the United Nations Secretary-General Ban Ki Moon's keynote speech to the General Assembly, New York, 28 June 2012 he spoke of, *'encouraging leaders to focus on reducing poverty, creating jobs and prioritizing sustainable development'* and *'the importance of food production'*. The Food & Agriculture Organisation (FAO) is warning that, *'feeding a growing world population will require a 60% increase in food production by 2050'* – Alberto Sandoval; the world population is projected to reach 9.1 billion by 2050. Building on the farmland in Leckhampton will not fix our local economy nor create lasting primary jobs; it will deny future generations of Cheltenham an invaluable source of local food. The land has good quality, mixture of Grade 2, 3a and 3b MAFF 1 classification, extremely drought resistance, with a local water supply. The farming settlement of Leckhampton pre-dates Cheltenham for these very reasons.

Many ideas have been put forward for an improved and more sustainable income for the Glebe & County land, zero carbon hydroponics would combine renewable energy and all year round local food production. The latest approach to hydroponics would be supported by Gloucestershire & Bristol Universities through research into climate change, production & distribution and is an excellent match to the NPPF core objectives (Para 17,b1,6,7&9). This could be combined with a sustainable City Farm (cows, sheep, pigs, poultry etc) following the business model of similar initiatives in Gloucester and Bristol and linking to the existing smallholdings, allotments, orchards etc; all valuable for future food production.

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### 3.5.1 LECKHAMPTON IS SO WELL CONNECTED TO THE URBAN AREA

Cheltenham has expanded enormously in our lifetime, but there still remains one nearly complete "Green Corridor" from the compact centre to the surrounding countryside. This is to the South, to the green fields of Leckhampton, Shurdington, and on upto Leckhampton Hill linking to the Cotswold Way. The open countryside in Leckhampton, mainly glebe and county owned land, formed from the original common land linked together through the green streets and spaces of park and Tivoli areas, to the very centre of the town. These fields are an asset to Cheltenham, contrasting to the formal parks to the North of town and provide opportunities for open-air play for children and recreation for adults. Evidence from the National Trust and others shows that, *'children who spend time experiencing nature, perform better at school, are more capable, and are happier; and we all know how important exercise is for maintaining good health in adult life'*.



In a wider context the open countryside at Leckhampton is part of the foreground and setting to the Cotswold escarpment bordering the town and the Cotswold ANOB which is recognised as a nationally important landscape.

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### 3.5.2 THE NATURAL CHOICE

The Natural Choice: securing the value of nature, TSO June 2011, para 4.23, p49, published by the Coalition Government in June 2011 sets out a radical new approach to valuing natural capital, explaining at the outset that 'Nature is sometimes taken for granted and undervalued'.

- It sets out the importance of natural spaces such as farmland and urban green spaces to:
- Public health, including mental health and emotional wellbeing
- Children's learning and experience of nature
- The importance of Biodiversity & Wildlife
- Provisioning including food from allotments
- Recreation, landscape and cultural heritage
- Carbon storage
- Flood management
- Pollination
- Improving water, soil and air quality

The Natural Choice also promises a new Green Area Designation that will give local people an opportunity to protect green spaces that have significant importance to their local communities.

It was this new designation which became law in the National Planning Policy Framework, this Local Green Space designation was also contained in the Coalition Agreement. It is the basis of many ministerial statements that the government has produced, essentially a tool *that 'local communities can use to protect open places they value'* (Prime Minister to Dame Fiona Reynolds of the National Trust, 21 September 2011).

It was to offer protection to sites that were not necessarily of huge scientific significance or great landscape value but were of great importance to local people; the council believe Leckhampton meets all the criteria for a Local Green Space.

Fiona Reynolds, Director General of the National Trust has warned that children are developing "nature deficit disorder" because they are deprived of access to green spaces, *'children are deprived of the experience of being outside, which not only affects physical health but emotional and mental wellbeing'*. The Trust is trying to improve access to the countryside by encouraging people to take up activities like walking or adventure sports on their own properties and by providing allotments. There are also programmes to get schools and young people visiting farms and to teach children about the outdoors, including simple things like just skimming a stone or climbing a tree.

The National Trust has updated its list of 50 things to do before you are 11 ½, because so many children have already completed the list, adding old favourites like playing pooh sticks and making a daisy chain. The top ten activities are, bike riding, building a den, climb a tree, cook on a campfire, hunt for fossils, discover what's in a pond, track wild animals, hold a scary beast (that would be the wife), birdwatching and walk barefoot, all doable in the Leckhampton countryside.

MIND<sup>[1]</sup> has commissioned two studies from the University of Essex, this work confirms that participating in green exercise activities provides substantial benefits for health and wellbeing. this report Mind calls for a new

green agenda for mental health, following growing evidence in support of an accessible, cost-effective and natural addition to existing treatment options – ecotherapy. *‘Three of the Government’s six key priorities set out in the recent Public Health White Paper were to increase exercise, improve mental health and reduce obesity – we believe that implementing this green agenda would go some way to achieving all three’.*

- 90 per cent of people who took part in MIND<sup>[1]</sup> green exercise activities said that the combination of nature and exercise is most important in determining how they feel.
- 94 per cent of people commented that green exercise activities had benefited their mental health. Some of their comments included:

The Environmental Health Research Foundation published a comprehensive study on the Benefits of Green Space <sup>[1]</sup> – Recent Research April 25, 2011; this study throws up some surprising results:

#### Environmental Benefits

- ☑ **Erosion Control and Water Run-Off Prevention**
- ☑ **Water Purification**
- ☑ **Air Purification**
- ☑ **Temperature Modification/Energy and Cost saving**
- ☑ **Oxygen Generation**
- ☑ **Carbon Sequestration**

#### Health Benefits

- ☑ **Recreation** - Green spaces provide ideal surfaces for a variety of recreational and sports activity and high use activities including parks and playgrounds.
- ☑ **Increased Physical Activity/Reducing Obesity** - Access to green space is an important predictor of increased physical activity (“active living”) and reduced risk of obesity. A recent study of over 40 million people in England shows that health disparities between high income and low income people are much narrower in areas with ample green space, possibly because it allows residents to become more physically active and reduce stress.
- ☑ **Healthcare/Stress Reduction** – Just being in, or viewing, green space for a few minutes reduces stress. This has been demonstrated by medical studies with hospital patients and the general public.

This work refutes the notion that green space is merely ornamental or aesthetic and indicates substantial environmental and human health benefits from healthy, properly maintained green space; this is the value of the accessible countryside at Leckhampton so close to Cheltenham.

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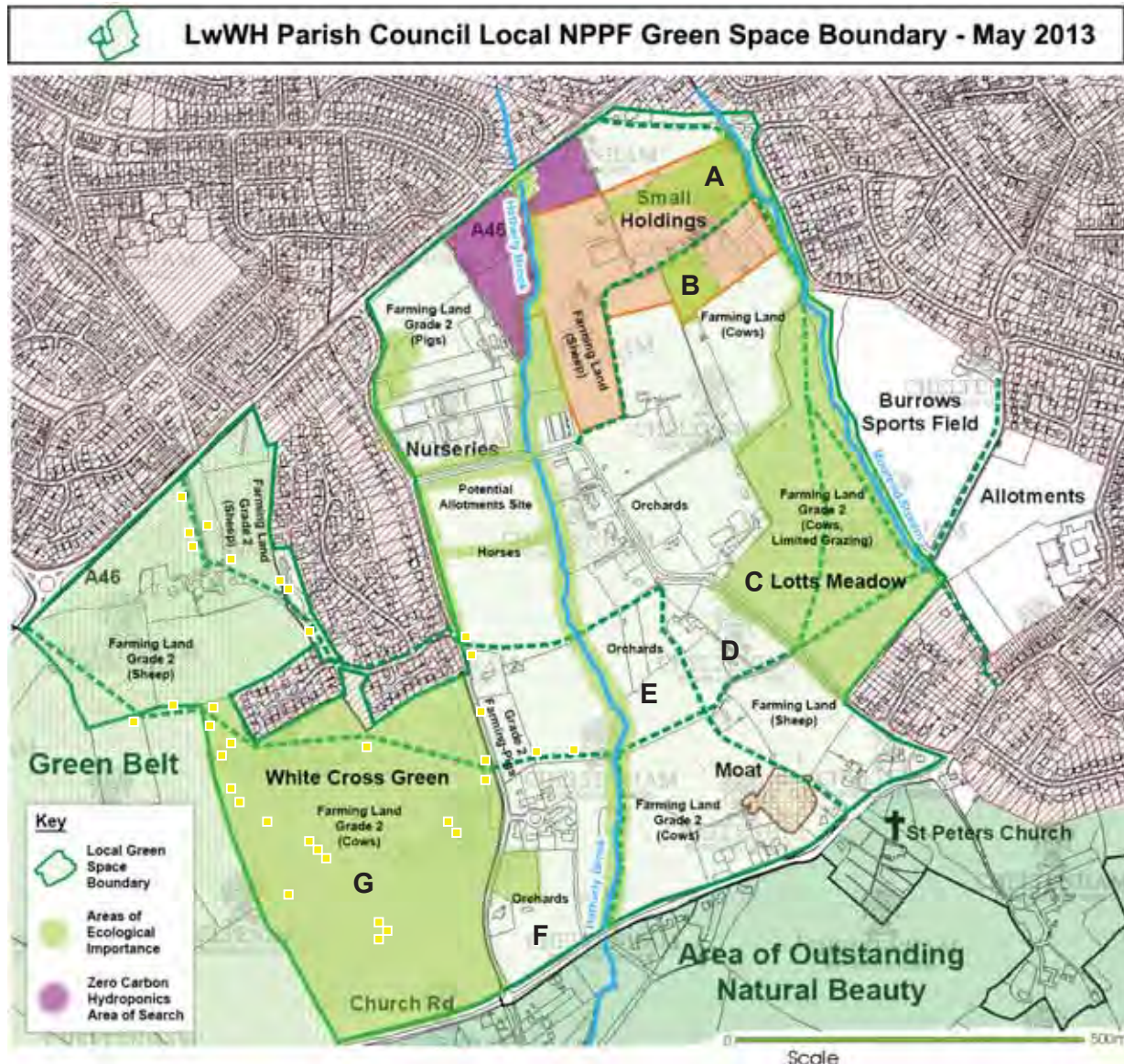
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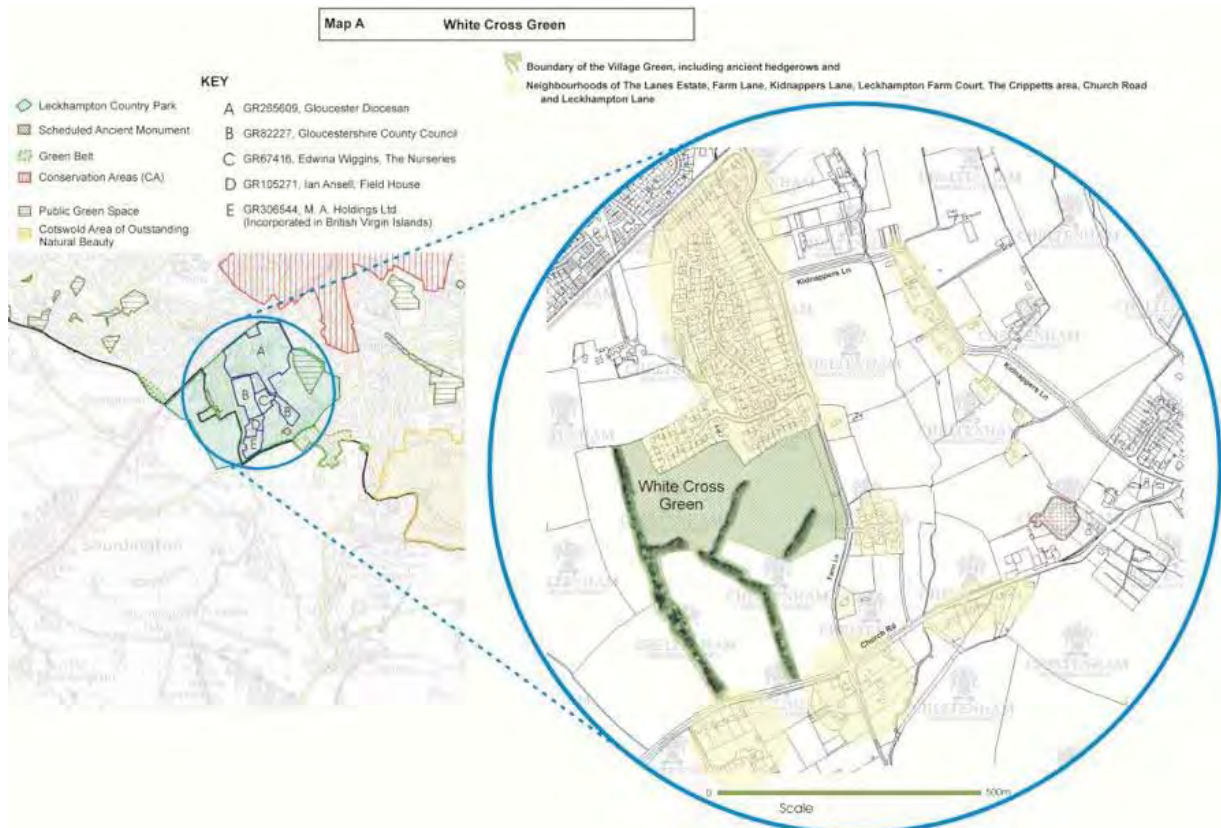
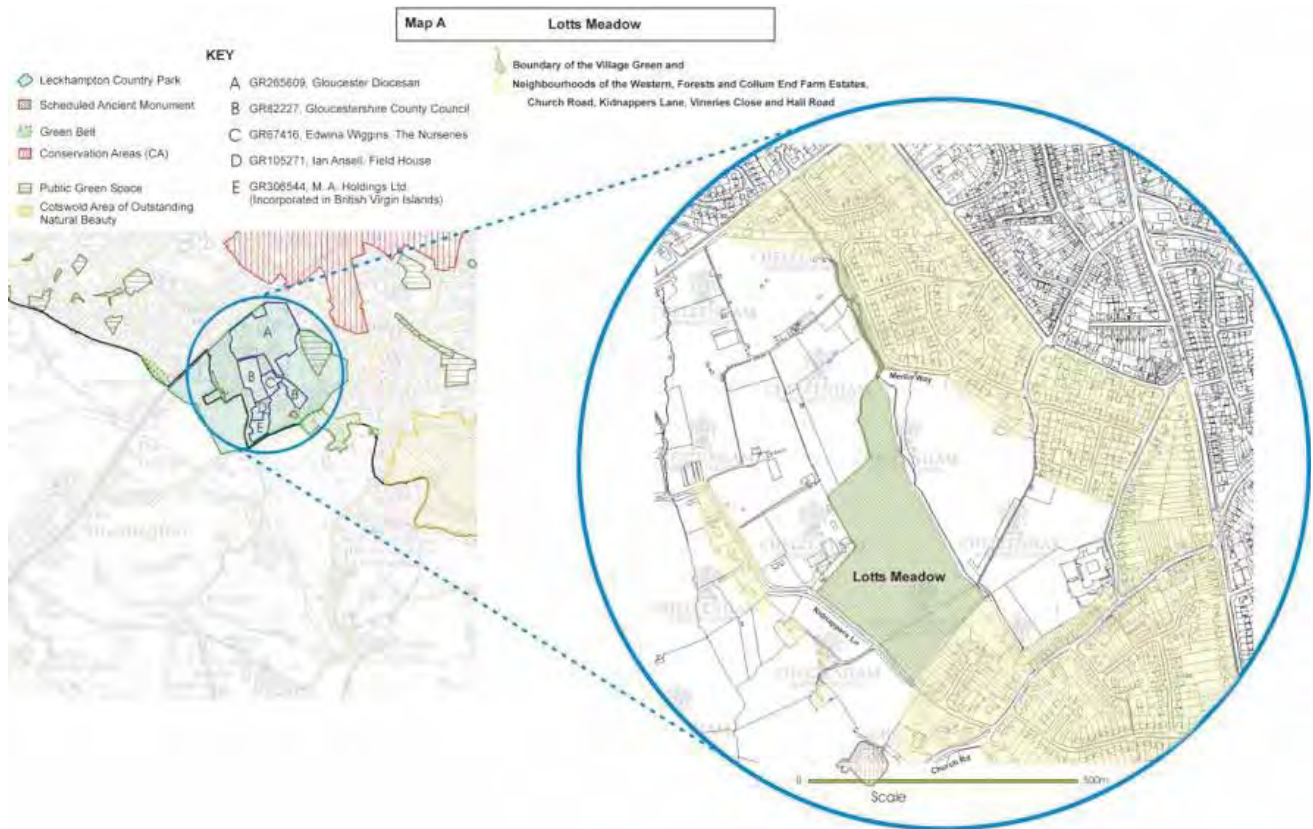
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- A. Semi-Improved, long grassland provides good reptile, small mammal & badger habitat
- B. Old apple orchard provides good reptile habitat, orchards are part of the UK Biodiversity Action Plan (BAP) habitat and therefore of conservation priority
- C. Lott's Meadow, a large area of semi-improved, long grassland, providing moderate reptile habitat and good badger foraging habitat. Large mature oaks, possibly veteran status, providing roosting sites for bats. Pipistrelle bat roosts in eastern most oak, bordered to the east by stream and associated wooded habitat. This along with the hedgerows/trees and scrub bordering the meadow provides commuting/foraging routes for bats, other mammals and birds, plus nesting opportunities for a wide variety of bird species including the red listed song thrush, linnet & sparrow
- D. Grassland provides good reptile, amphibian & insect habitat
- E. Apple Orchards – UK BAP habitat
- F. Orchard & Natural Habitat, Hatherley Brook runs to the eastern edge and provides very valuable rivering habitat
- G. Neutral semi-improved grassland, large area provides nesting sites for red listed Skylark



## Town & Village Green Applications



## APPENDIX 2 - EXTRACT FROM THE NPPF <sup>[2]</sup> CONSERVING AND ENHANCING THE NATURAL ENVIRONMENT

### 11. Conserving and enhancing the Natural Environment

109. The planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils;
- recognising the wider benefits of ecosystem services;
- minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

110. In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.

111. Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.

112. Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.

113. Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites,<sup>[24]</sup> so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.

114. Local planning authorities should:

- set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure; and
- maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast, and improve public access to and enjoyment of the coast.

115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads<sup>[25]</sup>.

Ref [24] Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and

- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

117. To minimise impacts on biodiversity and geodiversity, planning policies should:

- plan for biodiversity at a landscape-scale across local authority boundaries;
- identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;
- promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;
- aim to prevent harm to geological conservation interests; and
- where Nature Improvement Areas are identified in Local Plans, consider specifying the types of development that may be appropriate in these Areas.

118. When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest;
- development proposals where the primary objective is to conserve or enhance biodiversity should be permitted;
- opportunities to incorporate biodiversity in and around developments should be encouraged;
- planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss; and
- the following wildlife sites should be given the same protection as

European sites:

- potential Special Protection Areas and possible Special Areas of Conservation;
- listed or proposed Ramsar sites; <sup>[26]</sup> and
- sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

ref [25] English National Parks and the Broads: UK Government Vision and Circular 2010 provides further guidance and information about their statutory purposes, management and other matters.

119. The presumption in favour of sustainable development (paragraph 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.

120. To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

121. Planning policies and decisions should also ensure that:

- the site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation;
- after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and
- adequate site investigation information, prepared by a competent person, is presented.

Ref [26] Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar site.

122. In doing so, local planning authorities should focus on whether the development itself is an acceptable use of the land, and the impact of the use, rather than the control of processes or emissions themselves where these are subject to approval under pollution control regimes. Local planning authorities should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.

123. Planning policies and decisions should aim to:

- avoid noise from giving rise to significant adverse impacts <sup>[27]</sup> on health and quality of life as a result of new development;
- mitigate and reduce to a minimum other adverse impacts <sup>[27]</sup> on health and quality of life arising from noise from new development, including through the use of conditions;
- recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established; <sup>[28]</sup> and
- identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

124. Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.

125. By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

Ref [27] See Explanatory Note to the Noise Policy Statement for England (Department for the Environment, Food and Rural Affairs).

Ref [28] Subject to the provisions of the Environmental Protection Act 1990 and other relevant law.



Shurdington Parish Council supports the concept plan for a "Local Green Space" on land to the south west of Cheltenham in the parishes of Leckhampton (with Warden Hill) and Shurdington. We must point out that we do not have any funds to provide financial assistance. Additionally we could not support building of any sort on this land. As has been pointed out there could be a problem with the Shurdington land (White Cross and Brizen Farm) in that it is Tewkesbury Borough and may have to be considered separately. It would in such a circumstance be difficult for Shurdington to put forward a strong case as it could not be seen to benefit Shurdington residents. Leckhampton with Warden Hill PC has been able to call on considerable expertise to produce a very comprehensive plan but we do not have this luxury. Ideally we would wish White Cross (SD2) to be returned to green Belt and the Brizen Farm planning application to be rejected.

To summarise Shurdington Parish Council supports the LGS concept plan as we consider that any development in the area adversely affects the quality of life for the residents of both Leckhampton (with Warden Hill) and Shurdington.

The aim is to define the boundary of the Local Green Space (LGS), looking at whether any of the Leckhampton land should be omitted from the LGS in order to provide an area of search for potential sustainable development should any sustainable development on the land be feasible following the completion of the JCS and the Cheltenham and Tewkesbury local plans.

The main constraints on sustainable development comes from the traffic congestion as discussed in Annex 3, from the proximity to the AONB and to Leckhampton Hill, from the environmental and ecological value of the area, and from issues of air quality, which are linked to the problems of traffic congestion. Other constraints such as the availability of primary and secondary schooling can in principle be solved by building new schools or persuading schools to expand. But the traffic problems are fairly intractable.

For the A46, the traffic problem stems basically from the number of cars commuting into and through central Cheltenham. This problem might be reduced if employment could be moved to appropriate sites out of Cheltenham. Conversely it could be made worse if more employment is created in Cheltenham or in locations out of Cheltenham that would encourage more traffic to drive through central Cheltenham.

- Section 1 of this analysis therefore looks at where new employment might be located. It uses the reported findings of recent discussions on the locations of the JCS strategic development sites to examine how far individual locations might improve or worsen the situation.
- Section 2 then looks at the traffic problem in Church Road, where the main challenge is to prevent gridlock and also to prevent accidents to the children at Leckhampton Primary School. It uses data from the traffic survey conducted by LWWH Parish Council in September and October 2012. This survey included one day on which the traffic in Church Road gridlocked.
- Section 3 looks at the issue of pollution levels on the A46.
- Section 4 looks at four shortlisted options for the boundary of the Local Green Space and section 5 describes the Council's decision on which option to propose at this stage.

### 5.1 LOCATION OF NEW EMPLOYMENT

The JCS originally proposed that the main growth in employment would be located in the NW of Cheltenham, with the M5 junction 10 being upgraded to a full interchange. However, what has instead emerged has been a proposal to locate employment growth close to Kingditch. If this went ahead, it would make the A46 queue worse because the only good route from the south of Cheltenham to Kingditch is through the centre of Cheltenham. The alternative route round Cheltenham to the A40 and then along Princess Elizabeth Way is long and slow.

The Cheltenham Chamber of Commerce has recently been emphasising the importance of keeping traffic out of the centre of Cheltenham and has been pressing for the NW employment area to be located close to M5 junction 10 with housing located close by and with the junction 10 upgraded, as originally proposed. However, although the funding for upgrading junction 10 has apparently been pencilled in, finding the actual resources in the present economic climate may be difficult. Currently, the bridge at junction 10 is listed by DfT as a top priority maintenance project, but J10 is not listed by DfT as an improvement projects (source: DfT 2013 "Action for Roads", pg 31, fig 2.3). This has strengthened interest in other possible locations for employment growth that already have good access to the M5 via existing junctions. Possible sites relevant to the A46 and Church Road are the following:

- A. West Cheltenham in the area of Hayden Green and Fidlers Green, possibly with a new road linking from the A40 / B4063 to the B4634 / A4019, and accessible from M5 junction 11 via the A40 and from the north via the existing M5 junction 10 without needing an upgrade.
- B. To the west along the A40 and in the Staverton airport area, accessible from M5 junction 11.
- C. To the north at Ashchurch, expanding the existing industrial area and accessible from M5 junction 9.
- D. To the south at Brockworth adjacent to Gloucester Business Park and accessible from M5 junction 11A and from the A417.
- E. In south-west Cheltenham on the land south of Up Hatherley Way between Up Hatherley Way and Chargrove Lane. This is reasonably accessible from M5 junction 11 via the A40, Grovefield Way, Cool Pool Lane and Up Hatherley Way.
- F. In south-west Cheltenham, on the Leckhampton Green Field land.

Looking at the implications of each of these potential sites in relation to the traffic on the A46 and in Church Road:

**Location A** would be accessible from south Cheltenham and from the A46 via Up Hatherley Way - Cold Pool Lane - Grovefield Way – A40. The traffic would probably use this route rather than travelling through central Cheltenham provided the new spur road from the Golden Valley roundabout was constructed with good capacity. Traffic from further down the A46 could use Badgeworth Lane or the A417-M5-A40 route to the Golden Valley roundabout. So if new employment were created at location A, it would probably not greatly increase the traffic flow through the Moorend Park Road junction. However, it would be unlikely to improve the current traffic problem. If substantial employment could be relocated to location A from inner or north Cheltenham, it might reduce the A46 queue.

**Location B** would be accessible from south Cheltenham and from the A46 via the Up Hatherley Way - Cold Pool Lane - The Reddings - Badgeworth Road - Bamfurlong Lane route. From further south on the A46 it would be accessible via Badgeworth Lane. Traffic to location B from the south would be unlikely to travel through central Cheltenham. So, new employment at B should not make the A46 traffic problem worse. As for location A, if substantial employment were relocated to location B from inner or north Cheltenham, it might reduce the A46 queue.

**Location C** – Ashchurch, and also the NW Cheltenham development if located at an upgraded junction 10, would be accessible via Up Hatherley Way, Cold Pool Lane, Grovefield Way, A40 to M5 junction 11 and then to M5 junctions 9 and 10 respectively. From further south both would be accessible via the A417 to M5 junction 11A. So the impact of both sites would be similar to B, except that it might be less likely that substantial employment could be relocated to the Ashchurch site from central or north Cheltenham because Ashchurch is too distant.

**Location D** – New employment at Brockworth would be accessible via the A46 and via the A417. It could reduce the potential inward traffic on the A46 if more people living in Brockworth worked locally and fewer commuted into Cheltenham.

**Location E** would be accessible via Up Hatherley Way from A46 inward and outward. Because of the location close to the centre of Cheltenham, it might be easier, with sufficient inducements to employers, to transfer employment out of central Cheltenham to this location than to any other. If development at E just created more employment, however, it would make the A46 congestions substantially worse by attracting more commuting up the A46. It would also make the Church Road problem worse by drawing extra commuter traffic through Church Road / Kidnappers Lane. If E became the site for major development of new business, this might tip the balance in favour of building a new road from the A417 or from south of Shurdington to Up Hatherley Way, running west of the A46. This would reduce A46 traffic through Shurdington and on the section between

Leckhampton Lane and the Up Hatherley Way roundabout. A Shurdington by-pass has been considered many times, however, and rejected. It would not help to reduce the current A46 traffic from Up Hatherley Way to Moorend Park Road or the traffic congestion in the Bath Road.

**Location F** would increase the traffic in the worst areas: Church Road, Kidnappers Lane and the A46. It is substantially worse than location E because location E could be accessed via Hatherley Road and Warden Hill Road / Caernarvon Road and therefore would be less dependent on the A46. Location E is also accessible from the M5 without affecting the A46 traffic queue and is further away from Church Road, a point emphasised by Mark Power.

Out of options A to F, D has the best chance of ameliorating the A46 traffic problem. Unless it were possible to move substantial employment out of central and north Cheltenham and thereby to reduce the commuting into Cheltenham on the A46, E and F would make the A46 problem considerably worse. A, B and C might be neutral in their effect. At the moment the Council understands that it is more likely that any development at D would be primarily housing, with little or no employment. In that case location D would certainly make the traffic problem substantially worse as shown in Annex 3.

Relocating substantial employment out of central Cheltenham is bound to be difficult to implement without major inducements, which are unlikely to be available. So, the overall conclusion is that these potential development areas around Cheltenham are not likely to improve the traffic queue on the A46 significantly and could make it substantially worse. It will need complex traffic modelling of the sort provided by the Saturn Model to draw any firmer conclusions about this. The analysis affirms the importance of locating new housing close to employment.

## 5.2 CHURCH ROAD GRIDLOCK AND DANGER TO PRIMARY SCHOOL CHILDREN

The traffic flow in Church Road was surveyed by the Council at the Kidnappers Lane junction on six mornings in the period 10 September 2012 to 1 October 2012. The surveys covered all five weekdays and a second Thursday survey was carried out because on the first Thursday the traffic gridlocked. The data from these surveys is included at Table A.2.1.

On the five normal days, an average of 1606 vehicles passed along Church Road between Hall Road and Kidnappers Lane in the period from 07:30 to 09:30. Of these, 815 were travelling in a SW direction and 791 were travelling NE. The survey data shows that the flow through Church Road is fairly steady at 14 to 21 vehicles per minute from 07:45 to 09:00. Two traffic peaks occur; the first between 08:00 and 08:15 and the second from 08:30 to 08:45, associated with parents bringing children to Leckhampton Primary School.

The survey data for the day that Church Road gridlocked does not give much clue as to what initiated the congestion. The queue of traffic built up rapidly from 08:10 as the flow through Church Road fell to half its normal level by 08:20 and to a third of its normal level by 08:30. The shading in the table records the length of the traffic queue waiting to pass into the congested part of Church Road between Collum End Rise and the Leckhampton Road. The darkest shading indicates when the queue extended beyond St Peter's Church so that the end of the queue was out of sight from the survey point. The survey on 13 September was abandoned because the queue of vehicles was stationary. With hindsight it is a great pity that the survey was not continued to understand better how long the congestion persisted.





Normally the section of Church Road through Leckhampton Village works like a string of chicanes with vehicles in one direction waiting for a group of vehicles in the other direction to pass before themselves proceeding. A sudden surge of vehicles could cause both streams to proceed simultaneously and become locked and this maybe what happened. It seems most likely that gridlock would occur at the peaks times between 08:00 and 08:15 and 08:30 to 08:45. A build up of a traffic queue occurred at these times on other survey days, indicated by the shading for the surveys on 27 and 28 September and 1 October. Parents stopping to park and drop off children, and the traffic being held up by children crossing Church Road and Hall Road, could both increase the risk of gridlock in the 08:30 to 08:45 peak. Safety is also now a big concern after a child was hit by a car earlier this year, although fortunately not seriously injured. The Council is planning to do further traffic surveys in the autumn at the Hall Road junction by the school and at the junction with Leckhampton Road in order to try to understand the congestion problems better.

The criteria of preventing gridlock and avoiding accidents both point to the need to avoid any major diversion of vehicles from the A46 onto Leckhampton Lane. The measured pollution levels along Church Road exceed the EU limits in the winter months and this is another reason that one cannot afford to let the traffic increase. Various approaches to improve the problem have been considered, not least by the consortium of developers eager to build on the SD2 and LF sites. But none has been successful.

The problem of Church Road has been discussed recently by the Council with Mark Power of Gloucestershire Highways. Rob Williams, the traffic consultant that the Council has employed to help it in examining the traffic issues, also attended this meeting. Mark Power emphasised the importance of keeping traffic away from Church Road because there is no way to mitigate the problem. The road is narrow and hemmed in by housing and by the scarp of Leckhampton Hill and the AONB.

From table A.3.1 in Annex 3, the travel time from the Leckhampton Lane junction in Shurdington (junction L) to the Moorend Park Road intersection (junction M) is about 13 minutes when the A46 traffic queue is at its maximum length. According to anecdotal taxi-driver comments, this is already enough to cause some drivers to use the Leckhampton Lane / Church Road route to by-pass the A46 queue. In its surveys, the Council has measured the journey time via the Leckhampton Lane - Church Road - Leckhampton Road route from Shurdington to the Bath Road roundabout and to the Moorend Park Road intersection from 07:40 to 09:00. The journey time is 5 to 9 minutes depending on the traffic level in Church Road. This means that if there is no A46 queue at the Moorend Park Road intersection, the journey time is faster via the A46 route. For relatively light traffic when the A46 traffic queue only extends a little beyond Woodlands Road, the A46 route is only a minute or two longer than the route via Church Road. However, if the A46 queue extends as far as Up Hatherley Way, the route via Church Road is typically 6 minutes quicker.

The route via Church Road is longer in distance, but it is well established in traffic modelling that most drivers use a longer distance route if it saves significant travel time. Currently, drivers cannot easily tell in Shurdington how bad the A46 queue will be and whether it would be worth diverting. However, if the queue were regularly bad, as it would be if it regularly extended past the Up Hatherley Way roundabout, the Leckhampton Lane – Church Road route would be reliably shorter and many drivers would divert. On that basis, and using the traffic model in Annex 3, the A46 queue cannot be allowed to lengthen by more than about 0.3 km. This equates to 36 vehicles at 8.2 metre spacing. However, as discussed in Annex 3, the number of vehicles in the queue is likely to increase by around 91 (0.75km) because of the general increase in the traffic levels as the UK economy recovers. This implies that there is no scope for additional housing at Leckhampton even if there is no building at Brockworth.

### 5.3 TRAFFIC POLLUTION AT MOOREND PARK ROAD JUNCTION AND ALONG A46

It is not yet certain how serious the pollution is along the A46. Measurements by Cheltenham Borough Council at the Moored Park Road junction have recently started. The early results show that the nitrogen dioxide pollution levels are above the EU permitted levels. Monitoring at the Kidnappers Lane junction indicates that the pollution levels there are within the EU limit; this is not surprising because the traffic queue lasts less time and the area is more open, with the adjacent fields, so that the pollution is trapped much less than at Moored Park Road.

If the further survey results show that the pollution levels at Moored Park Road are consistently above the EU permitted levels, action would have to be taken. The only action that seems possible in this case is to reduce the traffic queue and certainly not allow any development that would increase the duration of the queue.

### 5.4 OPTIONS FOR THE LGS BOUNDARY

The Council has evaluated various options for the boundary of the LGS. The following four options (options 1, 2, 3 and 4) were put forward by the joint Neighbourhood Forum for the Council's debate on 25 July 2013. Option 1 includes all of the Leckhampton Green Field Land in the LGS. Options 2, 3 and 4 exclude part of the land: 9.4 hectares, 14.1 hectares and 14.6 hectares respectively. For all four options, the boundaries on the east, south, west and north-west sides of the LGS are identical; the options differ over the proposed boundary on the north side and how far the small holdings are incorporated within the LGS.

It should be noted that Burrows Field and the allotments were originally included in the LGS but have been excluded from all four options because they are outside the parishes of Shurdington and Leckhampton with Warden Hill and therefore outside the area currently covered by the joint neighbourhood planning. However, the fact that Burrows Field and the allotments have not been formally included in the LGS application does not in any sense mean that they do not need to be protected.

The small holdings are of great value from an amenity point of view. The Leckhampton Fields circular walk is much used by many people within a radius of a mile or more. It runs through the small holdings and round Lotts Meadow and Burrows Field via the Moored Stream footpath and via Kidnappers Lane and the footpaths west of Kidnappers Lane. It is accessible from every direction: from the west using the footpaths from Farm Lane to Lotts Meadow; from Warden Hill using the footpath along Moored Stream; from urban Leckhampton via the Burrows Field and the Moored Stream footpath; and from Leckhampton village using the footpath from Church Road to Burrows Field and Lotts Meadow. It also links via the Cheltenham Circular Path to the footpaths on Leckhampton Hill. It is a walk with a huge variety of interest including the animals on the small holdings, excellent views of Leckhampton Hill, and the fields and medieval cottages of old Leckhampton. Preserving this walk is therefore a top priority. The three options differ in how far they succeed in doing this:

Option 2 preserves all of the small holdings and all of the amenities of the footpath through the small holdings, including the field marked Farming Land (Sheep). It also leaves a fairly wide finger of green land extending almost to the A46. The hedgerows are also incorporated within the LGS to preserve habitats and to provide screening.

Option 3 preserves within the LGS the small holdings of main public value and interest on both sides of the footpath. It does not incorporate the field marked "Farming Land (Sheep)". The sheep are a valuable feature of the walk, especially for children in the lambing season, but it is proposed that the sheep could be moved to land south of the footpath. The proposed LGS boundary cuts through the small holdings: starting from the Parish

boundary at Moorend Stream at a point approximately 22 metres north of the T junction of the footpaths, the proposed LGS boundary skirts the north side of a willow tree and runs 1 metre north of the wire fence that marks the boundary of the small holdings along the north side of the footpath. When it reaches the access track from the A46, the boundary follows along the track along the east and south edges of the field marked “Farming Land (Sheep)” to Kidnappers Lane, incorporating the hedgerows within the LGS. It then follows west along Kidnappers Lane incorporating the hedgerows and south along Farm Lane, again incorporating the hedgerows.

Option 4 follows the footpath, incorporating the small holdings on the south side of the footpath but not those on the north side. Provided the hedgerows are retained along the full length of the footpath, this option preserves much of the amenity value. But it is considerably inferior to options 1, 2 and 3 because it would not protect the attractive and interesting small holdings on the north side of the footpath, and the footpath would be running along the edge of any development, were development to happen.

For all options, access from the A46 must be preserved so that the small holdings remain viable. All four options retain to a greater or lesser degree a green finger of land towards the A46. This green finger is important when the land is viewed from Leckhampton Hill and the Cotswold Way because it creates a greater visual gap between Cheltenham and the AONB and makes the existing housing in the Lanes Estate and along Kidnappers Lane and Farm Lane look more like outliers and not part of the Cheltenham conurbation.

## 5.5 COUNCIL DECISION TO PROPOSE OPTION 1

The Council is aware, and has been advised by Tracey Crews, that a Neighbourhood Plan cannot be used to prevent sustainable development, this is NOT our intention. Options 2, 3 and 4, by excluding some of the land from the LGS, would more clearly conform to this requirement than Option 1. However, at its public meeting on 25 July 2013, the Council resolved, on advice from experts on the NPPF & Neighbourhood Planning (CPRE in their official role in Neighbourhood Planning & Martin Horwood MP who personally worked on the NPPF LGS designation) , to put forward Option 1. The arguments for doing this are as follows:

- a) Whilst the Council, as a local authority, has always taken a balanced and pragmatic approach on potential development, it has never accepted that any of the Leckhampton land is suitable for large scale development. Excluding any of the land from the LGS might be construed as the Council tacitly accepting large scale development on this excluded land.
- b) The traffic survey and analysis, particularly taking into account the July 2013 DfT report “Action for Roads: A Network for the 21<sup>st</sup> Century”, makes a strong case that no development on the Leckhampton land can possibly be sustainable even if no development occurs at Brockworth. The Council cannot be accused of using the Neighbourhood Plan Concept to try to prevent sustainable development if no sustainable development is feasible anyway.
- c) CPRE advised that, whilst the Parish Council might have to be prepared to negotiate at a later stage, there was no reason not to put option 1 forward at this stage.
- d) The Council was advised by Martin Horwood, who was the author of the relevant LGS legislation within the NPPF, that although there is no specific limit for the maximum area for a LGS, the proposed area for the Leckhampton LGS is more than an order of magnitude smaller than the sort of size that might be deemed maximum.



## 6.1 INTRODUCTION

Modelling traffic flow is generally very difficult and computer-intensive. However, the A46 presents a relatively simple case. The A46 has a single lane each way along its whole length from the A417 to the centre of Cheltenham. During the peak morning traffic period, from about 07:30 to 09:15, there is a constant stream of traffic in both directions. The road is narrow and there is no overtaking or parking on the road. So in each direction there is an orderly line of traffic with vehicles primarily joining or leaving at the main junctions.

The traffic flow into Cheltenham is limited by the Moorend Park Road traffic lights. A queue of traffic builds up during the morning peak period. Its maximum length is typically around 1.2 km, extending past the Woodlands Road and Kidnappers Lane junctions. If traffic levels are high, or if there is some obstruction or roadworks on the A46 or in Church Road or Leckhampton Lane, the queue can extend beyond the Up Hatherley Way roundabout and even down to Shurdington.

**Table A.3.1: Measured speed of traffic flow and transit times of inward traffic between the A46 junctions.**  
The speed was measured on three different days of the week by driving in the traffic flow and recording when each junction was passed. The darkly shaded readings indicate how far the queue has reached. The more lightly shaded readings indicate congestion in Shurdington or at the back of the queue. On day 1 (Wednesday) the survey had to be abandoned because a tree fell and partially blocked the A46. On day 2 (Friday) the traffic was sufficiently heavy that the queue reached slightly beyond the Up Hatherley Way roundabout. On day 3 (Monday) the queue reached to about 100 metres north of the Up Hatherley Way roundabout.

Transit times (secs) between A46 junctions during morning peak period																		
Day		2	2	3	1	2	3	1	2	3	3	2	3	3	2	3	2	3
Time at U		06:49	07:10	07:15	07:21	07:24	07:32	07:38	07:43	07:50	08:03	08:06	08:16	08:35	08:35	08:47	09:00	09:00
	km																	
A → B	1.75	85	100	108	109	106	107	115	130	131		131			125		125	
B → L	1.01	70	68	82	68	67	96	94	90	133		105			132		67	
L → U	1.23	73	72	72	72	69	86	82	78	106		78			77		78	
U → K	0.60	42	44	45		41	51		47	56	63	66	115	178	300	93	45	40
K → W	0.19	15	15	19		12	14		20	126	100	121	126	202	139	149	51	19
W → M	0.55	35	33	45		41	52		145	209	276	258	269	219	258	280	228	206

Traffic speed in km/h at various times in the morning peak period																		
Day		2	2	3	1	2	3	1	2	3	3	2	3	3	2	3	2	3
Time at U		06:49	07:10	07:15	07:21	07:24	07:32	07:38	07:43	07:50	08:03	08:06	08:16	08:35	08:35	08:47	09:00	09:00
	km																	
A → B	1.75	74	63	58	58	59	59	55	49	48		48			50		50	
B → L	1.01	51	54	44	54	54	38	39	40	27		35			28		54	
L → U	1.23	61	62	62	62	64	51	54	57	42		57			58		57	
U → K	0.60	51	49	48		53	42		46	39	34	33	19	12	7.2	23	48	54
K → W	0.19	46	46	36		57	49		34	5.0	6.8	5.7	5.4	3.4	4.9	4.6	13	36
W → M	0.55	57	60	44		48	38		14	9.0	7.2	7.7	7.4	9.0	7.7	7.1	8.7	9.6

The development of the traffic queue can be seen in Table A.3.1, which shows the speed of the inward traffic flow measured by driving in the traffic flow and recording the time at which each junction was passed. The dark

shading shows when the queue has formed and how far it has reached. The junctions are shown on Map A.3.1 and are designated:

- M Moorend Park Road crossroads, traffic-light controlled.
- W Woodlands Road T junction
- K Kidnappers Lane T junction
- U Up Hatherley Way roundabout
- L Leckhampton Lane T junction at the Bell Inn at the north of Shurdington
- B Badgeworth Lane T junction at the south of Shurdington
- A A417 roundabout. This is a motorway standard roundabout above the A417 with slip roads to and from the A417 dual carriageway.

Travelling from the A417 to the Moorend Park Road intersection takes about 5.5 minutes in good driving conditions before 07:00. As Table A.3.1 shows, the journey time increases to between 13 to 20 minutes in the 08:00 to 08:45 period. This is due not just to the traffic queue but also to congestion in Shurdington, which is caused particularly by traffic waiting to turn right onto Leckhampton Lane.

The outward traffic on the A46 is similar in volume to the inward traffic, but peaks earlier. The travel times and traffic speeds are shown in Table A.3.2. In light traffic, the outward journey from the M to A takes about 5.5 minutes. In the peak period congestion in Shurdington can add 5 minutes. The outward traffic flow is not discussed further in this annex, but it is worth noting that the surveys at M showed that the outward traffic occasionally backs up onto the junction and partly blocks it. This is an issue for potential housing development on the Leckhampton land, but is not discussed further here.

**Table A3.2: Measured speed of outward traffic flow and transit times between junctions.** The speed was measured on three different days of the week by driving in the traffic flow and recording when each junction was passed. The lightly shaded readings on day 2 show congestion in Shurdington. On day 1 (Wednesday) the survey had to be abandoned because a tree fell and partially blocked the A46.

Transit times in seconds between A46 junctions in the morning peak period																	
Day		2	2	2	1	3	1	2	3	1	2	3	3	2	3	2	3
Time at U		06:38	07:03	07:15	07:16	07:22	07:30	07:35	07:40	07:46	07:56	07:59	08:13	08:21	08:45	08:51	08:58
	km																
M → W	0.55	42		39		59		37	37		37	47	47	43	38	46	44
W → K	0.19	14		15		16		16	17		16	18	12	14	17	15	13
K → U	0.60	39	44	38		40		39	42		39	43	43	42	43	48	38
U → L	1.23	68	74	71	101	76	81	87	93	71	87			206		90	
L → B	1.01	68	67	70	72	79	73	66	95	70	66			191		101	
B → A	1.75	105	95	103	111	104	163	104	119	103	104			104		109	

Traffic speed in km/h at various times in the morning peak period																	
Day		2	2	2	1	3	1	2	3	1	2	3	3	2	3	2	3
Time at U		06:38	07:03	07:15	07:16	07:24	07:30	07:35	07:40	07:46	07:56	07:59	08:13	08:21	08:45	08:51	08:58
	km																
M → W	0.55	47		51		34		54	54		54	42	42	46	52	43	45
W → K	0.19	49		46		43		43	40		43	38	57	49	40	46	53
K → U	0.60	55	49	57		54		55	51		55	50	50	51	50	45	57
U → L	1.23	65	60	62	44	58	55	51	48	62	51			21		49	
L → B	1.01	54	54	52	51	46	50	55	38	52	55			19		36	
B → A	1.75	60	66	61	57	61	39	61	53	61	61			61		58	



## 6.2 PROPOSED LARGE SCALE DEVELOPMENTS

A number of large scale housing developments have been proposed or are imminent for sites along the A46, and these are of great concern from a traffic point of view. The main housing developments are:

**Brizen Farm (BF)** – This is a proposed development of 175 houses on green belt land in Tewkesbury Borough to the east of the Up Hatherley roundabout. An outline planning application for this development was submitted to Tewkesbury Borough Council in March 2013. The development would have one road entrance/exit, which would connect directly to the Up Hatherley Way roundabout, making this a 4-way roundabout rather than 3-way at present.

**SD2 site (SD2)** – This is a proposed development in Tewkesbury Borough west of Farm Lane and south of the Brizen Farm estate. An application was made for 350 houses on this site in 2009 and was refused on appeal. However, the SD2 site is currently in the Tewkesbury Borough Council development plan. The site would have one entrance/exit which would be onto Farm Lane and would be designed so that traffic from the estate could only proceed north along Farm Lane and could not turn south. This is to try to prevent any traffic adding to the morning traffic on Leckhampton Lane and Church Road. The SD2 site would also have a second entrance, but this would be for emergency vehicles only. If the proposed traffic measures work successfully, most of the traffic should flow to the A46 Kidnappers Lane junction. However, some of it could still double back to Church Road via Kidnappers Lane.

**Leckhampton fields (LF)** – An application for development on this site has been under consultation for over a year. This consultation involved a consortium of developers and covered both the LF and SD2 sites. Originally it was for a total of 1300 houses, with 350 on SD2, as in the 2009 submission, and 950 on LF. This number was later reduced to 300 on SD2 site and 800 on LF. The consortium has recently split up and the applications for the SD2 and LF sites will now be submitted separately. The original proposal included building on land east of Farm Lane owned by Gloucestershire County Council. GCC declines to make this land available and it is now expected that a new application will come forward for the remainder of the LF site at the end of August for around 600 houses. However, it is understood that the GCC land is still identified for housing development in the JCS strategic site options. So an addition application could come forward for this at a later stage.

**Brockworth development** – This is a proposed development of 1500 houses on green belt land in Tewkesbury Borough close to the A417 at Brockworth. It would infill between the north of Brockworth and the south side of the A417, extending west from the A46/A417 junction potentially as far as M5 junction 21A. The site has an excellent link to the A417 and to the M5 and to several centres of employment and although it is green belt, some development here may be likely.

**Developments on the green belt south-west of Cheltenham** – An application has previously been submitted to build around 80 houses on green belt land at Oaklands near the intersection of Up Hatherley Way and the A46. This application was refused. For the purpose of the current modelling, no development has been included on this land.



The traffic queue that builds up at the Moorend Park Road intersection is a slowly moving queue that becomes stationary at the traffic lights while waiting for traffic to cross on Moorend Park Road. Further back, the queue generally moves steadily forward but sometimes comes to a temporary stop. The average vehicle spacing in the traffic queue is an important parameter in the traffic model because it relates the queue length to the number of vehicles in the queue. One can derive the average vehicle spacing by using the survey data in table A.3.1.

The traffic surveys at the Moorend Park Road intersection show that the maximum capacity of the junction for traffic flowing north-east on the A46 is around 900 vehicles per hour but that this falls to around 745 vehicles per hour during the peak traffic period because of the larger amount of traffic on Moorend Park Road that is crossing the intersection or joining the A46 traffic. The traffic queue starts to form at around 07:40 when the vehicle arrival rate exceeds the maximum capacity and it lasts until 09:00 to 09:15, depending on the volume of the traffic. The queue grows quickly, reaching W at about 07:45 and K at about 07:50. The growth then slackens and the queue typically extends slowly to a final length of about 1.2 km to a point 100 to 200 metres north of U. It starts to decline again at around 08:45 as the peak traffic flow reduces.

Between the Woodlands Road junction (W) and the Moorend Park Road intersection (M), the number of vehicles in the queue is given by the formula  $N_{WM} = C_M * t_{WM}$  where  $C_M$  is the capacity of the junction (745 vehicles/hour) and  $t_{WM}$  is the time that vehicles in the queue take to travel from W to M. From table A.3.1, the average value of  $t_{WM}$  is 262 seconds and the average number of vehicles in the queue from K to M is 53.8. Hence, the average vehicle spacing over the 550 metres between M and W then works out at 10.2 metres.

For the Woodlands Road junction, the net number of vehicles per minute joining the inward A46 traffic in the period 08:10 to 08:40 is 1.6. The  $K \rightarrow W$  vehicle flow is therefore  $12.4 - 1.6 = 10.8$  vehicles per minute. From table A.3.1, the average  $t_{KW}$  is 136 seconds and the number of vehicles in the queue is 24.7. Hence their average spacing over the 190 metres between the junctions is 7.7 metres and the average speed of the queue is 5.2 km/h (3.3 mph).

In table A.3.1, there is only one measurement where the queue extended as far as the Up Hatherley Way roundabout. Using just this one measurement is not very reliable because one does not know the precise number of vehicles that turned out of the queue at the Kidnappers Lane junction. However, using the average value for this from the traffic survey would give the flow  $U \rightarrow K$  as 12.5 vehicles per minute. The number of vehicles in the queue is then 63, giving a vehicle spacing of 9.5 metres and the speed of the queue as 7.7 km/h (4.5 mph).

These vehicle spacings are what one would have expected and are consistent with what has been observed in the traffic surveys. A spacing of 7.5 to 8 metres is typical in slowly moving traffic queues. The larger spacing from  $W \rightarrow M$  is to be expected because drivers naturally leave a larger gap from the vehicle in front as the queue moves faster when the lights change. The value of 9.5 metres between U and K probably reflects the effect of the two traffic streams converging at the roundabout.

Based on this data, it seems reasonable to take a value of around 8.2 metres as the typical vehicle spacing for the purpose of calculating the length of the queue for different numbers of extra vehicles. This is slightly larger than the average spacing typically reported in the literature. But it has been observed in the traffic surveys that the traffic contains quite a high proportion of large family and executive cars as well as commercial vehicles and other large vehicles. So one would expect the vehicle spacing to be larger than for inner city traffic, where there would be a higher proportion of small and compact cars. Also when traffic is crawling slowly in a queue, drivers

often leave a gap in front and then catch up. These gaps add to the average vehicle spacing and length of the queue. This behaviour was observed in the traffic surveys at Kidnappers Lane.

#### 6.4 CHECKING THE CONSISTENCY OF THE SURVEY DATA

In clear conditions, the number of vehicles per minute arriving at the Moorend Park Road intersection M at time  $t$  is given by the expression:

$$N_M(t) = A_{IF}(t-t_{AM}) + B_J(t-t_{BM}) + L_J(t-t_{LM}) + U_J(t-t_{UM}) + K_J(t-t_{KM}) + W_J(t-t_{WM}) \quad (1)$$

Here  $A_{IF}(t-t_{AM})$  is the inward flow from the A417 roundabout at time  $t-t_{AM}$ , allowing for the travel time  $t_{AM}$  that it takes the vehicles to travel from A to M.  $B_J(t-t_{BM})$  is the net number of vehicles per minute joining the inward traffic flow at the Badgeworth Lane junction at time  $t-t_{BM}$  allowing for the travel time  $t_{BM}$  that it takes vehicles joining the flow at B to reach M.  $B_J(t)$  is in fact negative during the morning peak period because more cars turn off the A46 onto Badgeworth Lane than join from Badgeworth Lane. The other terms in the equation are similar.

Over the period 07:45 to 08:45, the average net number of vehicles per minute joining the inward flow at each of the junction is:

$B_J(t)$	$L_J(t)$	$U_J(t)$	$K_J(t)$	$W_J(t)$
-2.7	-4.1	1.7	-1.5	2.3

One can test how well equation (1) works by calculating the expected flow arriving at each junction from the flow that came from the previous junction, allowing for the travel time between the junctions. One can then compare this calculated flow with the actual flow measured in the traffic surveys. The agreement is good for all the junctions, given that all of the surveys including the measurement of travel times between junctions were done on different days. On this basis, one can conclude that the manual analytical approach detailed above has been validated and is considered to be fit-for-purpose when considering future development implications.

In the surveys at each of the junctions, the number of vehicles in each direction was counted in 5 minute periods. The numbers fluctuate from one period to another because the flows tend to be bunched. However, the average flow is fairly constant over the 07:45 to 08:45 period and this makes it possible to model the flows and queue growth using these mean values. This makes the modelling much easier than using the time dependent flow of individual vehicles.

The average flows in vehicles per minute for the period 07:45 to 08:45 measured by the traffic surveys are shown below. This data has been used as the basis for the traffic modelling. For the A417 junction, the data is for the north corner of the roundabout, where traffic leaving the A417 from the west merges with the inward flow on the A46 and also turns right to join the outward flow on the A46. This discussed in section 6.9.

	A (NW corner)	B	L	U	K	W
A46 inward flow going straight over	11.9	14.2	11.3	8.2	10.2	10.6
A46 inwards turning off	Not applicable	3.7	4.1	2.7	2.1	0.2
Side road traffic joining inward flow	6.3	1.1	0.0	4.4	0.7	2.6
A46 inward flow into junction	11.9	18.0	15.4	10.9	12.3	10.8
A46 inward flow out of junction	18.2	15.3	11.3	12.6	10.8	13.1
Net joining	6.3	-2.7	-4.1	1.7	-1.5	2.3

## 6.5 GROWTH OF THE TRAFFIC QUEUE DOWN TO UP HATHERLEY WAY

At most times of the day, the number of vehicles  $N_M(t)$  arriving at the Moorend Park Road junction is lower than the capacity  $C_M(t)$  of junction and so no queue forms (apart from a short queue waiting for the traffic lights to change). When  $N_M(t)$  becomes greater than  $C_M(t)$ , the queue starts to grow. What then matters is the number of vehicles per minute  $N_Q(t)$  arriving at the back of the queue. The vehicles in the queue are moving forward like a pipeline. The front end is emptying at the rate  $C_M(t)$ , which creates a similar space at the back of the queue. So the queue will grow at the rate of  $N_Q(t) - C_M(t)$ .

Once the back of the queue reaches the Woodlands Road junction W, the A46 queue will continue to grow if  $N_Q(t) + W_J(t) > C_M(t)$ . This assumes that all of the vehicles coming from Woodlands Road can still join the queue even though the junction can be blocked by the queue. The traffic surveys showed that a small queue does form on Woodlands Road but this queue does not build up. Enough drivers in the A46 queue, seeing cars waiting, give way to allow vehicles to exit from Woodlands Road. They also stop to allow vehicles to turn right from the A46 into Woodlands Road and this again allows vehicle from Woodlands Road to join the queue.

When the queue passes the Kidnappers Lane junction K, it continues to grow if  $N_Q(t) + W_J(t) + K_J(t) > C_M(t)$ . It is worth noting that the fact that it takes individual vehicles 6 to 7 minutes to travel from K to M does not introduce any time delays in this equation. Space at the front of the queue propagates quickly to the back as the vehicles jostle forwards. At Kidnappers Lane, vehicles have to turn right and cross the outward traffic in order to join the inward flow. Some vehicles wait several minutes to do this; others instead turn left into the outwards flow and do a U-turn at the Up Hatherley Way roundabout. The traffic surveys found that a short queue of ten or so vehicles can temporarily build back along Kidnappers Lane, but this does not last long and is not an important effect.

## 6.6 TRAFFIC GENERATED BY PROPOSED NEW DEVELOPMENTS

### 6.6.1 BRIZEN FARM SITE (BF) – PROPOSAL FOR 175 HOUSES:

The easiest of the proposed new housing estates to consider is the Brizen Farm site (BF). Vehicles would enter or exit at the Up Hatherley Way roundabout, which would become 4-way. Exiting vehicles would give way to the outward A46 traffic flows continuing along the A46 and turning right into Up Hatherley Way. This outward A46 traffic tends to be bunched and there are sufficient gaps in the flow so that a small flow of vehicles from BF should be no problem joining the roundabout. Any vehicles from BF heading inwards on the A46 would also have priority over the inward A46 traffic.

The housing proposed on the Brizen Farm estate is family sized and it is reasonable to assume that it would have a fairly high proportion of working families. The evidence from the adjacent Lanes Estate is that residents would be highly car dependent and that, although there are fairly frequent buses into central Cheltenham, most commuting would be by car or by bicycle. This leads to the following assumptions:

Per house	Number of vehicles	A46 to M	A46 to K and W	A46 outwards	A46 to Up Hatherley Way
0.60	105	45	11	24	25

This assumes that 0.6 cars per household are mobilised in the peak traffic period. This figure is what has been assumed by the developer's consortium according to information they provided at their public exhibitions. It is also consistent with the results from the traffic surveys that the Council has made at the Lanes Estate.

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## 6.6.2 PROPOSED BROCKWORTH DEVELOPMENT (PB) - 1500 HOUSES

This proposed development is located between Brockworth and the A417. Residents would probably commute by foot, bicycle or car to the Gloucester Business Park and by car to various other sites in and around Gloucester and Cheltenham. The PB site would also be well placed for commuting to destinations to the east along the A417 and to the north and south along the M5, including to Bristol. A fair set of assumptions for PB mobilisations and traffic flow might be as follows. In order to present a robust analysis, the mobilisations have been spread over 90 minutes (07:30 to 09:00) because of the longer commuting distances to likely destinations.

PB: Assumed car mobilisations 07:30 to 09:00

Per house	Number of vehicles	NE on A46	West to Gloucester and M5	East on A417	SW on A46
0.6	900	350	400	100	50

Assuming that the proportion of vehicles leaving the A46 at each junction will be the same as for the *normal* traffic on the A46, a sensible distribution between the different destinations would be as follows:

PB: Flow of vehicles on A46 towards Cheltenham

	A46 NE	Turning left to Badgeworth Lane	Turning right to Leckhampton Lane	Turning left to Up Hatherley Way	Continuing to Moorend Park Road junction
Vehicles	350	73	68	53	156
% of total	39%	8.1%	7.5%	5.9%	17%

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## 6.6.3 SD2 SITE – PROPOSAL FOR 300 HOUSES

The SD2 site is adjacent to the existing Lanes Estate and to the proposed Brizen Farm Estate. Unlike Brizen Farm, it is not green belt. However the site is all within a mile of the top of Leckhampton Hill and close to the AONB. It is also close to Leckhampton Lane and there is a risk that traffic from SD2 could add significantly to the traffic through Church Road. For both reasons, the Council has objected strongly to the proposal for building on this site. Unfortunately, however, because SD2 is not in the green belt or AONB, it is currently included in the



Tewkesbury Borough development plan. Recently Shurdington Parish Council made an application for SD2 to be converted to green belt as part of a green belt swap. This submission was strongly supported by Leckhampton with Warden Hill Parish Council. However, the SD2 site currently remains in the TBC plan and therefore needs to be included in the traffic analysis.

Because of the potential grid-locking problem in Church Road, the developers have proposed to design the exit from the SD2 site onto Farm Lane so that traffic is forced to travel towards the A46 and prevented physically and by traffic signs from turning right onto Farm Lane towards Leckhampton Lane and Church Road. Nevertheless, some are likely to double back to Church Road via Kidnappers Lane.

The likely peak period traffic flow from SD2 is as follows:

SD2 site: Assumed car mobilisations 07:45 to 09:00

Per house	Number of vehicles	A46 NE to Moorend Park Rd junction		A46 NE - left to Woodlands Rd		South and west via A46	Church Road
		Bath Rd / The Park	Right into MPR				
0.6	180	72	10	2		81	15
		40%	5.6%	1%		45%	8.3%

All of the 84 cars travelling NE on the A46 would contribute to the queue.

#### 6.6.4 LECKHAMPTON FIELDS (LF) – PROPOSAL FOR 800 HOUSES

Of all the proposals, the LF site creates the most difficult traffic problems. Unlike the SD2 site, there is no easy way to prevent traffic from the new houses from flowing to Church Road. This has led to various proposals for mitigating the impact on Church Road, all of which have serious problems. Also, it is currently proposed that the development would have an exit at its north end close to M. This would create a route from the A46 in Shurdington to the Moorend Park Road junction that would by-pass the traffic queue on the A46. Although it is a longer route in terms of distance it would be much quicker if there were a long queue on the A46. This would create a problem at junction L with so much traffic turning onto Leckhampton Lane.

The public exhibition by the developers covered the proposed LF and SD2 developments jointly and figures were given for the expected vehicle mobilisations for the 1100 houses proposed on the two sites together. The mobilisations were predicted to be around 0.6 mobilisations per house in the peak period 07:45 to 09:00. As noted earlier, this figure is consistent with the number of mobilisations in the peak period from the existing Lanes Estate, which is adjacent to both SD2 and LF sites. Of the total of 660 vehicles mobilised, the developers assumed that 70 would flow to Church Road. A reasonable set of assumptions for both developments would therefore be as follows:

Site / homes		Veh.	A46 to M <sub>IF</sub> / M <sub>L</sub>		A46 to M <sub>R</sub>		A46 to W <sub>L</sub>		South & west		Church Rd		Total east		Total in queue	
			No	%	No	%	No	%	No	%	No	%	No	%	No	%
	1100	660	298	45	24	4	7	1	261	40	70	11	94	14	329	50
SD2	300	180	72	40	10	6	2	1	81	45	15	8	25	14	84	47
LF	800	480	226	47	14	3	5	1	180	38	55	11	69	14	245	51

The developers proposed that the LF site would have three traffic exits/entrances onto the A46: one at the Kidnappers Lane junction, which would become traffic-light controlled, and two at the north end of the site, about 400 metres south-west from the Moorend Park Road intersection. One of these would be bus-only and both of them would be controlled by traffic lights. The differences in percentages between the SD2 site and LF site shown in the table arise because the northern exit from LF would give very easy access to the Moorend Park Road junction. So the LF development would be a very convenient place to live for people working in Cheltenham. This would be slightly less true for the SD2 development. For convenience in the traffic modelling, the three LF exits have been treated as one. Since the existing traffic queue passes beyond all three exits, treating them as one makes no difference to the growth of the A46 traffic queue.

It is important to note that residents on the LF site would not be motivated to travel earlier to avoid the congestion because they have access to the front of the A46 queue. The same is substantially true also for the SD2 site and the Brizen Farm site. So there is no prospect that the congestion on the A46 would be mitigated by earlier travel, unless it is by commuters travelling from the A417 and further south.

## 6.7 COMBINED EFFECT OF THE PROPOSED DEVELOPMENTS ON THE QUEUE LENGTH

The analysis above has covered each of the four developments separately. In the modelling of their combined effect, the traffic that currently flows in the absence of any of the proposed developments is for clarity referred to as the *normal* traffic and the traffic arising from the proposed new developments is referred to as the *extra* traffic.

In calculating the combined effect of the proposed developments, we need to consider three components:

1. The rate at which the queue is lengthening because of the *extra* vehicles from the developments that are travelling to M.
2. The extent to which some *normal* and *extra* vehicles feeding into the queue at each junction may have difficulty joining the queue because the junction is being blocked by the queue. Vehicles waiting to join the queue could then build up cumulatively into a long queue on the feeder road. This feeder queue would reduce the number of vehicles joining the A46 queue; it would therefore be a negative addition to the A46 queue.
3. The rate at which the queue is lengthening because *normal* and *extra* vehicles wanting to turn off at a junction are instead getting trapped in the queue. The trapped vehicles cause the queue to lengthen at a rate equal to the difference between the rate at which vehicles are reaching the turn-off point and being released from the queue and the rate at which new vehicles wanting to turn off are feeding into the end of the queue. One must include in this not only the *normal* traffic but also the *extra* traffic from PB.

### 6.7.1 EFFECT OF THE *EXTRA* VEHICLES TRAVELLING TO M

If all of the developments were to go ahead, their cumulative effect would add 523 vehicles to the queue (BF:45 + PB:156 + SD2:82 + LF: 240). For the average vehicle spacing of 8.2 metres estimated in section 6.3, this would add 4.3 km. When added to the *normal* queue length, this would be enough to take the end of the queue to beyond the A417 intersection.

As noted in section 6.4, we can assume a constant value for the *normal* traffic in vehicles/minute for the period 07:45 to 08:45. It also makes the modelling easier to assume that the *extra* flow is uniform over the period 07:45 to 09:00. In practice, vehicles travelling to a distant destination tend to leave earlier than 07:45. The surveys

carried out at the Lanes Estate showed a group of vehicles departing before 07:15 and heading south on the A46. However, these early mobilisations affect the outward traffic flow rather than the inward flow.

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#### 6.7.2 DEVELOPMENT OF A FEEDER QUEUE AT JUNCTION U

The *extra* traffic from LF and SD2 should be able to join the queue easily if, as proposed by the developers, junction K is made traffic-light controlled. The traffic light priorities would need to be set to allow all the traffic from LF and SD2 to exit at K since otherwise this would encourage traffic to flow back to Church Road. So the modelling assumes that the *extra* traffic from LF, SD2 and BF joins the queue quickly with no feeder queues.

The traffic surveys for junction U show that, on average, 4.4 vehicles/minute currently join the queue from Up Hatherley Way whereas only 2.8 vehicles/minute leave the queue. So an extra 2.6 vehicles/minute are joining. However, the traffic flow (5 vehicles/minute) turning right from Up Hatherley Way to join the outward flow on the A46 holds back the other traffic and gives time for all of the 4.4 vehicles/minute to force their way into the queue. It was observed that two flows zip together.

The situation at U is likely to become more difficult if one adds the *extra* traffic from LF and SD2 joining the queue at K, because this means the queue will be moving forward more slowly from U, leaving less space for the joining vehicles. In the modelling two scenarios have therefore been considered: (1) that traffic light control and/or other measures are introduced to prevent any substantial queue building up on Up Hatherley Way, and (2) that a proportion of the traffic flow from Up Hatherley Way builds up as a feeder queue.

For scenario (2), the model generates a queue on Up Hatherley Way roughly proportional to how much of the proposed new housing building goes ahead. For the case where all of the proposed developments go ahead, the feeder queue on Up Hatherley Way grows at 3.3 vehicles/minute. This means that it would be 1 km long after 36 minutes. The feeder queue consists of vehicles turning right at U to join the outward flow on the A46 as well as the vehicles turning left to join the inward flow.

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#### 6.7.3 VEHICLE BEING TRAPPED IN THE QUEUE BETWEEN JUNCTIONS L AND U

For *normal* traffic, the end of the queue reaches a point between U and K and then remains roughly stable for about an hour. During this period the traffic flow from U to K and from K to W is queue limited. The traffic surveys show that these queue-limited flows are 12.3 vehicles/minute and 10.9 vehicles/minute respectively. Adding the *extra* traffic from LF and SD2 takes up 4.3 vehicles/minute of the queue-limited flow U→K and this leaves 8.0 vehicles/minute remaining for the other traffic.

At U, a further 0.75 vehicles/minute of the flow is taken up by *extra* vehicles from BF. Assuming there is no feeder queue on Up Hatherley Way, 4.4 vehicles/minute are also joining the queue from Up Hatherley Way. This leaves a residue of only 2.85 vehicles/minute remaining for the *normal* and *extra* inward traffic on the A46.

Without the *extra* traffic, the flow of *normal* traffic from L to U, as measured from the traffic survey, would be 10.9 veh/min, of which 2.7 veh/min would turn left at U and the remaining 8.2 veh/min would continue ahead on the A46. With the *extra* traffic, this flow of 8.2 veh/min falls to 2.85 vehicles/minute. The rate at which vehicles can turn left onto Up Hatherley Way falls in the same proportion, from 2.7 to just 1.0 vehicles/minute. Meanwhile, vehicles wanting to turn left at U are joining the end of the queue at a rate of 3.3 vehicles/minute (2.7 vehicles/minute *normal* traffic and 0.6 vehicles/minute *extra* turning-off traffic from PB). So the difference (2.4 vehicles/minute including 0.1 rounding) is trapped cumulatively in the queue whilst waiting to turn off at U.

The overall situation between L and U is therefore as follows. Traffic is flowing into the end of the queue at a rate of 13.2 vehicles/minute (10.9 *normal* plus 2.3 *extra* from PB). Meanwhile, vehicles are only able to flow into junction U at a rate of 3.8 vehicles per minute including those turning off. The queue is therefore lengthening at a rate of 9.4 vehicles/minute. At this rate of growth, the queue reaches L in 16 minutes at 08:08 (L→U = 1.23 km or 150 vehicles at 8.2 metres spacing).

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#### 6.7.4 ANALYSIS FOR JUNCTION L

The above analysis applies similarly at junctions L except that one does not need to consider any feeder queue since all the traffic from Leckhampton Lane turns left and joins the outward traffic and none joins the inward traffic.

Using the traffic survey data for L, the average *normal* traffic flow from B to L is 15.4 vehicles/minute. Of this, 4.1 turns vehicles/minute turn right into Leckhampton Lane. The traffic flow L→U is 11.3 vehicles/minute. (This is slightly different from the measured flow of 10.9 vehicles/minute into U from L. This may be partly because the surveys at L and U were carried out on different days and also because a small amount of traffic leaves between L and U by turning left onto Chargrove Lane). With the *extra* traffic the flow L→U is reduced from 11.3 vehicles/minute to 4.2 vehicles/minute. The traffic turning right onto Leckhampton Lane is reduced in the same proportion, from 4.1 to 1.5 vehicles/minute. Including the *extra* traffic from PB waiting to turn off at L and U, 3.2 more vehicles/minute are now being trapped cumulatively in the B→L queue whilst waiting to turn off at L.

The overall situation for the queue between B and L is therefore as follows. Traffic is flowing into the end of the queue at a rate of 18.3 vehicles/minute (15.4 *normal* plus 1.73 *extra* from PB to M, 0.59 *extra* from PB turning off at Up Hatherley Way and 0.64 *extra* from PB turning off at L). Vehicles are flowing forward at L at 5.7 vehicles/minute (4.2 veh/min straight ahead and 1.5 veh/min to Leckhampton Lane). The remaining 12.6 vehicles/minute are building up cumulatively in the queue. Growing at this rate, the queue now reaches junction B in 10 minutes at 08:18 (B→L = 1.01 km or 123 vehicles at spacing of 8.2 metres).

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#### 6.7.5 ANALYSIS FOR JUNCTION B

The analysis at junction B is similar to that for junction U, except that even with the slow movement of the A46 queue, slightly more vehicles leave the queue at B by turning left into Badgeworth Lane than join the queue from Badgeworth Lane. So there will be enough space vacated in the queue for the joining vehicles. However, vehicles wanting to turn right from Badgeworth Lane onto the A46 (1.4 veh/min on average) may have difficulty in crossing through the A46 queue. So it is possible that some feeder queue could build up on Badgeworth Lane because of this right turning traffic. In the modelling, two scenarios have been run: (1) with no feeder queue and (2) where all of the traffic joining at B is held up in a feeder queue. The model shows this makes very little difference to the growth of the A46 queue. For the base case, the A46 queue arrives at the A417 junction at 08:32 for scenario (2) compared with 08:31 for scenario (1).

Using the traffic survey data for B, the average *normal* traffic flow from A to B is 18.0 vehicles/minute. Of this, 3.7 turns left into Badgeworth Lane and 14.2 continues ahead. With the *extra* traffic, the flow A→B is reduced from 18.0 to 5.6. The traffic turning left into Badgeworth Lane is reduced in the same proportion, from 3.7 to 1.2. Adding the *extra* traffic from PB, 3.4 more vehicles/minute are now being cumulatively trapped in the queue waiting to turn off at B.

The overall situation between A and B is therefore as follows. Traffic is flowing into the end of the queue at a rate of 21.8 vehicles/minute (18.0 *normal* plus 3.8 *extra* from PB). Vehicles are only able to flow into junction B at



a rate of 5.8 vehicles/minute (4.6 going straight ahead and 1.2 turning off). Therefore, 16.0 vehicles/minute are building up cumulatively in the queue. Growing at this rate, the queue now reaches junction A in 13 minutes at 08:31 (A→B = 1.75 km or 213 vehicles at a spacing of 8.2 metres).

## 6.8 TRAFFIC MODEL

A simulation of how the queue grows has been implemented as an Excel model in order to examine what constraints traffic congestion would place on the potential developments in the Leckhampton and Shurdington areas. The base case, described above in section 6.7, is shown in Table A.3.3. The model calculates the times at which the end of the traffic queue reaches each of the A46 junctions and also calculates the queue speed and the queue-limited travel time to junction M for each junction. The model allows the *normal* traffic to be altered in order to examine the effect of queues building up on other roads, particularly on Up Hatherley Way, and also the effects of future increases in traffic volumes. During the recession traffic volumes have fallen but they are expected to recover towards their historical trend as the UK economy improves. This is discussed further in section 6.8.2.

As a check on consistency, the model also calculates the number of vehicles in the queue using two semi-independent methods, as shown in the base case output in Table A.3.3. Method (1) simply multiplies the distance between each junction and junction M by the assumed average spacing of 8.2 metres between the vehicles in the queue. This method is independent of the model, except that the model also uses the same vehicle spacing of 8.2 metres. Method (2) calculates the number of vehicles in the queue at each junction by integrating the net increase in the number of vehicles in each section of the queue as the queue builds up from each junction to the next. The two methods give close agreement, as shown in Table A.3.3.

Table A.3.3 Traffic model results												
Assumptions		Homes		Mobilisation		Peak traffic period		Percentage of mobilisations added to inward A46 flow				
						Start	Mins	to M	to K	to U	to L	to B
Leckhampton Fields site (LF)		800		60%		07:45	75	50.0				
SD2 site (SD2)		300		60%		07:45	75	45.6				
Brizen Farm site (BF)		175		60%		07:45	75	42.9	10.5			
Proposed Brockworth site (PB)		1500		60%		07:30	90	17.3		5.9	6.4	8.1
		W	W-K	K	K-U	U	U-L	L	L-B	B	B-A	A
Normal traffic from traffic survey (veh/min)	In	10.8		12.30		10.9		15.4		18.0		11.9
	Turning off	0.2		2.1		2.7		4.1		3.7		0.0
	In fwd	10.6		10.2		8.2		11.3		14.2		11.9
	Joining	2.6		0.7		4.4		0.0		1.1		6.3
	Out fwd	13.1		10.8		12.6		11.3		15.3		18.2
	Turn off en route		0.0		0.0		0.4		0.0		0.2	
	Queue growing				0.3							
Extra traffic joining (veh/min)	LF @ K			3.2								
	SD2 @ K			1.1								
	BF→M @ U					0.6						
	BF→K @ U					0.1						
Traffic flow including extra traffic	In	10.8		8.0		3.8		5.7		5.8		2.8
	Turning off	0.2		2.1		1.0		1.5		1.2		0.0
	In forward on A46	10.6		5.9		2.8		4.2		4.6		2.8
	Feeder road normal	2.6		0.7		4.4		0.0		1.1		6.3

(veh/min)	Held in feeder road	0.0		0.0		0.0		0.0		0.0		3.1
	Fewer normal leaving	0.0		0.0		0.0		0.0		0.0		0.0
	Net normal joining	2.6		0.7		4.4		0.0		1.1		3.1
	Extra joining	0.0		4.3		0.7		0.0		0.0		0.0
	Out forward on A46	13.1		10.8		8.0		4.2		5.6		6.0
	Turning off en route				0.0		0.4		0.0		0.2	
	Becoming trapped in queue (veh/min)						2.4		3.2		3.4	
	Reduction in traffic flow		0%		35%		65%		63%		68%	
Extra joining before A (veh/min)	PB→M					1.73		1.73		1.73		1.73
	PB →turn off at U							0.59		0.59		0.59
	PB →turn off at L									0.64		0.64
	PB →turn off at B											0.81
Growth of queue (veh/min)	Veh/min joining the end of the queue						13.2		18.3		21.8	
	Rate of queue growth (veh/min)		9.7		7.0		9.4		12.6		16.0	
Time end of queue reaches each junction	Distance between junctions (km)		0.19		0.60		1.23		1.01		1.75	
	Minutes for queue to reach next junction		2.4		10.4		15.9		9.7		13.3	
	Time queue reaches junction	07:40		07:42		07:52		08:08		08:18		08:31
Queue size and travel time	Queue length (km)			0.74		1.34		2.57		3.58		5.33
	Vehicles in queue (1)			90		163		313		437		650
	Vehicles in queue (2)			90		156		306		429		643
	Queue speed km/h			5.3		3.9		2.1		6.3		2.9
	Minutes to reach M			6.4		15.6		51.5		61.1		96.8

The *normal* traffic data in the model comes directly from the surveys. These were carried out on different days and the fact that the model joins well at each junction shows that the traffic flows on the A46 are quite consistent from day to day. The fact that the traffic queue extends each day to roughly the same point between K and U and lasts for roughly the same time (except if traffic is impeded on the A46 or in Church Road by road works or is affected by an accident on the M5) is another example of the day to day consistency in the average amounts of traffic. The traffic does however tend to bunch and to fluctuate in the short term, as illustrated for example in the survey data for the A417 junction in section 6.9. This means that the way the model links from one junction to the next is sensitive to the time period over which the traffic is averaged. In the model this time period has been kept rigorously at 07:45 to 08:45 for every junction.

There are slight differences in the survey data between the number of vehicles leaving each junction and the number arriving at the next junction. These differences may arise from the averaging discussed above, but they may also be genuine, at least in part. The difference of 0.3 vehicles/minute between the outflow from U and the inflow into K is what one would expect since the queue is growing and compacting between these two junctions during the 07:45 to 08:45 period. The difference of 0.4 between the outflow from junction L and the inflow into junction U might also be partly expected because of traffic turning left onto Chargrove Lane en route. What is perhaps surprising is to not find a difference between the outflow from B and the inflow at L. One would expect the latter to be larger because of some net traffic joining the inward flow in Shurdington. However, the population of Shurdington is quite elderly and allowing for vehicles travelling to Shurdington leaving the inward flow it may be the case that Shurdington contributes only a little net traffic in the peak period. Another factor is that, as shown in Table A.3.1, there is congestion in Shurdington during the 07:45 to 08:45 period particularly

due to vehicles turning right onto Leckhampton Lane. The difference between vehicles in a light queue between B and L at an average vehicle spacing of say 12 metres and vehicle flowing normally at a spacing of say 24 metres would reduce the average inflow by 0.7 vehicles/minute compared with the outflow from L. This could easily be masking the inflow of vehicles from Shurdington.

### 6.8.1 OUTPUTS FROM THE MODEL AND CONSTRAINTS ON SUSTAINABLE DEVELOPMENT

Table A.3.4 shows the result of running the model for a range of permutations for the number of houses on the four sites.

- A417 roundabout: If the queue reaches as far as the A417 roundabout, it is likely to disrupt traffic on the A417. This is discussed in section 6.9 below. The red, orange and amber shading indicates diminishing level of risk to the A417 and M5.
- Leckhampton Lane: As the traffic queue extends beyond the Up Hatherley Way roundabout, the journey time to the Moorend Park Road junction increases and it becomes attractive for drivers to instead use the alternative routes:

Leckhampton Lane → Church Road → Leckhampton Road → Bath Road;

Leckhampton Lane → Church Rd → Leckhampton Rd → Moorend Park Rd → M;

Leckhampton Lane → Church Road → Farm Lane → Kidnappers Lane → K

Table A.3.4		Current traffic levels as measured in the traffic surveys															
		No queue building up on Up Hatherley Way													Queue UHW		
	Case number	base	1	2	3	4	5	6	7	8	9	10	11	12	13	14	
Number of houses on each site proposed	LF	800	800	300	400	200	300	200	0	200	100	300	50	250	800	200	
	SD2	300	300	300	300	200	0	0	300	0	100	0	0	0	300	0	
	BF	175	0	0	0	0	0	0	0	0	0	0	0	0	175	0	
	PB	1500	0	1100	700	1500	1500	1500	700	700	700	0	700	0	1500	1500	
Time at which the traffic queue reaches each junction and the queue-limited travel time in minutes from each junction to M (italics)	Up Hatherley Way (U)	07:52	07:56	07:58	07:58	07:59	08:00	08:03	08:07	08:10	08:11	08:16	08:19	08:19	07:52	08:03	
		<i>16</i>	<i>16</i>	<i>14</i>	<i>14</i>	<i>13</i>	<i>13</i>	<i>13</i>	<i>13</i>	<i>13</i>	<i>13</i>	<i>13</i>	<i>12</i>	<i>13</i>	<i>17</i>	<i>13</i>	
	Leckhampton Lane (L)	08:08	08:21	08:27	08:28	08:31	08:35	08:42	08:59	09:09	09:11				08:11	08:44	
		<i>52</i>	<i>45</i>	<i>33</i>	<i>35</i>	<i>30</i>	<i>29</i>	<i>28</i>	<i>29</i>	<i>28</i>	<i>28</i>				<i>44</i>	<i>28</i>	
	Badgeworth Lane (B)	08:18	08:36	08:45	09:11	08:50	08:57	09:07							08:22	09:11	
		<i>61</i>	<i>54</i>	<i>43</i>	<i>44</i>	<i>40</i>	<i>39</i>	<i>38</i>							<i>54</i>	<i>37</i>	
	A417 (A)	08:31	08:56	09:10	09:11											08:38	
		<i>97</i>	<i>82</i>	<i>60</i>	<i>63</i>											<i>79</i>	
For each junction, the table shows the time the queue reaches the junction and below in italics the calculated travel time in minutes to junction M.																	
Feeder queue on Up Hatherley Way Cases 13 and 14 assume that a long traffic queue builds up on Up Hatherley Way because the roundabout is partly blocked by the A46 queue vehicles. The other cases assume that all the vehicle from Up Hatherley Way are able to join the inward queue fairly easily and no cumulative queue forms on Up Hatherley Way.																	

Currently the travel time from junction L to junction M is about 13 minutes when the traffic queue is maximum. As discussed in Annex 2, if it were allowed to increase significantly more, a lot of traffic could switch to the Leckhampton Lane – Church Road routes in order to by-pass the queue. It is very important to avoid this for two main reasons:

1. There would be a serious risk of causing gridlock in Church Road. If the route round the south side of Cheltenham through Church Road becomes blocked, or even if it becomes unreliable, this will force the traffic onto the A46. Occasionally this happens if Church Road or Leckhampton Lane are closed or impeded by road works, and the effect on the existing A46 queue is very pronounced. There is no way to mitigate the Church Road problem.
2. The traffic turning right at L holds up the traffic flow, increasing the congestion and pollution in Shurdington. Also, the right turning traffic has to cross the outward traffic flow on the A46. The junction is an accident hot-spot.

Various proposals have been made to limit the traffic flow on Leckhampton Lane, but none of these has proved satisfactory. Closing Leckhampton Lane is out of the question because of the volume of traffic that would be forced onto the A46 and Moorend Park Road, as happens if Church Road is closed by road works. Impeding the traffic using chicanes or traffic lights and one way sections has been considered. The problem is in adding sufficient delay to the Church Road – Leckhampton Lane route in a way that drivers would accept and not circumvent and that would not cause accidents.

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#### 6.8.2 EFFECT OF TRAFFIC GROWTH

According to a Department of Transport report “Action for Roads” published in July 2013 (ISBN: 9780101 867924, [www.gov.uk/dft](http://www.gov.uk/dft)), traffic levels are currently below their historical trend because of the recession and are expected to return back towards their historical trend as the UK economy recovers. According to Table 1.2 of the DfT report, traffic on local roads (i.e. not strategic road network), was 6% lower in 2012 than in 2007 and 9.2% below its historical trend. If traffic recovers to its historical trend, then it will be 19% higher in 2025 than in 2012 and 23% higher by 2031. The DfT report observes that traffic could rise even faster than this depending on future fuel costs and more fuel-efficient vehicles. Until recently fuel costs were expected to rise as demand increased and oil reserves became depleted. However, it is now being projected that the development of fracking technology and shale gas could make oil much cheaper.

How far this projected traffic growth would apply to the peak traffic on the A46 is not certain. According to the Cheltenham and Gloucester Connectivity Study Draft Phase 1 Report May 2010, employment in Cheltenham fell between 2003 and 2008 more than in other local areas including Gloucester. If this trend were to continue it would offset part of the general increase in traffic affecting the A46. However, the lower employment in Cheltenham will already be reflected in the data from the Council’s A46 traffic surveys and the employment is as likely to recover as to continue to decline. JCS is certainly predicting that employment will rise. Therefore it seems more likely that traffic levels will rise due to change in employment.

Overall, it seems reasonable to project that there will be at least a 10 per cent increase in the *normal* peak traffic on the A46 over the period 2013 to 2023. An increase in the *normal* traffic affects the queue on the A46 in two ways: it increases the number of vehicles in the inward flow on the A46; secondly, it increases the traffic on Moorend Park Road, which then takes up a larger proportion of the traffic light cycle at the junction. Currently the Moorend Park Road traffic causes the capacity  $C_M$  for the inward A46 traffic to fall from 15.0 vehicles per minute to an average of 13.1 vehicles/minute over the 07:45 to 08:45 period - a reduction of 1.9 vehicles/minute. One might expect any increase of in the Moorend Park Road traffic to reduce this proportionately.



An increase of 10% in the *normal* traffic with no new building either at Leckhampton or at Brockworth would increase the number of vehicles in the queue by about 91 of which 79 would come from the additional traffic on the A46 and 12 would come from the reduction in  $C_M$ . These 91 vehicles would increase the maximum queue length by 0.75 km at 8.2 metres vehicle spacing and this would mean that the end of the queue would extend beyond the Up Hatherley Way roundabout every day. As discussed in Annex 2, this would cause many vehicles to divert onto the Leckhampton Lane – Church Road route to by-pass the A46 queue. So a 10% increase in *normal* traffic seems likely to preclude any sustainable development in Leckhampton even if there were no housing development at Brockworth.

## 6.9 SPREAD OF THE QUEUE BEYOND THE A417 ROUNDABOUT.

The traffic model shows that if all of the developments were to go ahead as currently proposed, the A46 would reach the A417 roundabout at about 08:31. If the proposed development at Brockworth does not go ahead at all, then the proposed developments at LF and SD2, not including BF (case 1 in Table A.3.4), would cause the queue to reach the A417 roundabout at 08:56 when the peak traffic is declining but traffic levels are still high. If for case 1 one also includes the 10% increase in traffic as discussed in section 6.8.2, then the queue would reach the A417 at around 08:39.

Three traffic surveys were done at the A417 roundabout in March 2013, two on the north side, counting the inward traffic and the vehicles coming off the A417 from the west, and one on the east side counting the outward traffic and vehicles joining the A417 in an easterly direction. The data from the second longer survey on the north side is shown in the table below.

In all three surveys, a traffic queue was several times observed extending back from the A46 onto the west side of the roundabout. It was not possible to tell what caused the queue; it may have been due to the traffic streams from the west and south converging onto the single lane of the A46 or more likely it was due to vehicles turning right onto the road to Bentham which is a short distance NE of the roundabout. Whatever its cause, this queue blocked the vehicles coming off the A417 from getting onto the roundabout, both from turning left onto the A46 inward flow or from turning right to join the outward flow. It was also observed that at other times, the fairly constant stream of A46 traffic from the SW again held back the vehicles from the A417, particularly those wanting to join the inward queue. As a result a substantial queue of traffic built up on the A417 slip-road. It was not possible from the survey point to determine whether this queue reached beyond the slip-road onto the main A417, but it does seem very likely that if the A46 queue were to extend as far as the A417 roundabout it would cause a serious tailback onto the A417.

From	To	SN	WN	SN+WN	WS	W	SE	S
		From A46 SW going NE	From A417 west going NE	Total going NE on A46	From A417 W going SW	Total from A417 W	From A46 SW going E	Total from A46 SW
07 : 05	07 : 10	34	18	52	11	29	10	44
07 : 10	07 : 15	45	24	69	13	37	7	37
07 : 15	07 : 20	27	25	52	24	49	5	49
07 : 20	07 : 25	58	18	76	12	30	9	30
07 : 25	07 : 30	44	31	75	17	48	9	48
07 : 30	07 : 35	45	32	77	24	56	9	56

07	:	35	07	:	40	62	29	91	14	43	11	43
07	:	40	07	:	45	54	38	92	21	59	11	59
07	:	45	07	:	50	71	28	99	31	59	10	59
07	:	50	07	:	55	54	26	80	25	51	11	51
07	:	55	08	:	00	65	27	92	29	56	6	56
08	:	00	08	:	05	62	19	81	15	34	8	34
08	:	05	08	:	10	54	35	89	10	45	5	45
08	:	10	08	:	15	70	29	99	24	53	13	53
08	:	15	08	:	20	69	36	105	26	62	12	62
08	:	20	08	:	25	62	43	105	32	75	8	75
08	:	25	08	:	30	52	37	89	28	65	9	65
08	:	30	08	:	35	54	37	91	28	65	8	65
08	:	35	08	:	40	48	27	75	26	53	8	53
08	:	40	08	:	45	55	33	88	10	43	11	43
08	:	45	08	:	50	56	45	101	29	74	10	74
08	:	50	08	:	55	Traffic queue still on A417 slip road but clearing.						

Traffic flows measured at the north corner of the A46/A417 roundabout

The table above shows that between 08:30 and 08:50, vehicles leave the A417 at a rate of about 12 vehicles/minute; 7.2 join the A46 queue inwards and 4.8 join the A46 outward traffic. If this flow were completely blocked, the traffic queue building back on the A417 would reach the M5 slip-road within about 10 minutes. The A417 roundabout currently does not have any traffic light control and therefore the vehicles on the A46 from the SW have priority over the traffic coming from the A417. With traffic light control one could give equal priority to the two flows. This would reduce the build up of the queue on the A417 from 12 vehicles per minute to 6.6 vehicles per minute. Even so, the queue would still reach the end of the M5 slip road in about 19 minutes.

## 6.10 TRAFFIC ACCIDENTS

The accident statistics for the past 10 year, which have been kindly provided by Gloucestershire Highways, show three fatalities on the A46 between the A417 and Moorend Park Road: one just south of Badgeworth Lane, one in Shurdington and one between Shurdington and Up Hatherley Way. There have been nine serious accidents: four between the A417 and Badgeworth Lane, one in Shurdington, and four between Up Hatherley Way and Moorend Park Road.

Accident statistics for the section of the A46 between Badgeworth Lane and the Bath Road shops show a total of eleven fatal and serious accidents and a total 99 minor accidents involving one or more casualties in each case. All but one of the eleven fatal and serious accidents involved pedestrians, cyclists or motor cyclists. Of the minor accidents, 14 involved pedestrians, 13 cyclists and 14 motor-cycles. There were 18 nose-to-tail shunts. Sixteen accidents involved vehicles turning right, mostly at the Moorend Park Road and Leckhampton Lane junctions. Although the accidents were spread all along the length of the A46, particular hotspots were in Shurdington near the Badgeworth Lane and Leckhampton Lane junctions and at the Up Hatherley Way and Moorend Park Road junctions.

One fatality, three serious accidents and 13 minor accidents involved cyclists. During the traffic surveys, several near-misses were observed where the cyclist had to cycle very hard to avoid a car coming too fast or too close.

The Council raised this as a separate issue with Gloucestershire Highways and with the Highways Agency because of two near misses observed at the A417 roundabout. The household travel survey in the Gloucestershire Transport Plan 2011-2026 shows that commuting by bicycle increased from an average of 6.3% in 2004-06 to 8.2 % in 2007 and 8.4% in 2008. However, during the traffic surveys, cyclists commuting on the A46 were more conspicuous for their bravery and athleticism than for their numbers. If a safe cycle route could be provided along the A46, it could make commuting by cycle much more popular and could help to reduce the congestion.

## 6.11 CONCLUSION

According to the Gloucestershire Local Transport Plan 2011-2026 (LTP3), workday traffic flows on the A46 are 15,000-20,000 a day and in the maps on pages 24 and 25 of LTP3, the A46 south of Shurdington is marked as the worst congestion hot-spot in the Cheltenham-Gloucester area in 2003 and as still remaining a severe congestion hot-spot in 2026. The A46 is operating at close to its maximum capacity, particularly at peak times.

The results from this traffic survey and analysis show that the traffic system on the south of Cheltenham, with the A46 and Church Road as its key element, is still functional, but has very little capacity to spare; none if you take into account the likely increase in traffic as the UK economy recovers as discussed in section 6.8.2. The system was described as “broken” by Rob Williams, the traffic consultant who has advised the Parish Council. But the system has not yet fallen apart. The priority must be to hold it together and not to push it over the edge.

It appears from the 2013 DfT report “Action for Roads” that there is very little if any DfT investment planned for the strategic road network in Gloucestershire. The A417 south of Cheltenham up Crickley Hill and through Nettleton is shown in the report as having severe congestion, but there is no plan to improve this. Fig. 2.3 of the report shows that the priorities for strategic investment are in the south-east and north-west with nothing in this area.

LTP3 also speaks of the scarcity of funding for the Gloucestershire traffic infrastructure. The funding depends a lot on money from developers, but upgrading the A46 would take more funding than development would provide. So, it is essential for the Cheltenham-Gloucester area to keep the south Cheltenham traffic system viable and not to overload so it falls apart.

The Council believes that the results from this traffic survey and analysis are a serious warning, particularly for the JCS, about the importance of taking a holistic approach to the future of the Gloucester-Cheltenham-Tewkesbury area and to the competitiveness of the local economy. A point that is emphasised by DfT in “Action for Roads” is the vital importance of conserving the traffic network and the risk that many people will become unable to work because of growing traffic congestion. DfT observes that in a highly competitive world, the compactness of the UK should be a strong competitive advantage because of the shorter travel distances, but that it could easily become a weakness due to congestion. The World Economic Forum’s Global Competitiveness Index now ranks Britain twenty-fourth in terms of its road network – behind countries including France, Germany, Austria, Portugal, the Netherlands, Spain, Japan, Canada and the United States. Whilst cities such as London are seeing a reduction in car use thanks to public transport infrastructure, areas such as Cheltenham and Gloucester that are very car-dependent, are particularly vulnerable, both economically and socially.

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## 1.0 INTRODUCTION

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### 1.1 Appointment and background

Landscape Design Associates was commissioned by Cheltenham Borough Council in March 2003 to prepare a landscape and visual appraisal of an area of land to the southern edge of the town between Farm Lane, Church Road and Shurdington Road, Leckhampton.

Landscape Design Associates are specialist landscape consultants based in Oxford with extensive experience of landscape assessment and countryside planning on a diversity of projects across the county. We have worked extensively within Gloucestershire and have recently completed landscape character assessments on behalf of both Gloucestershire County Council and Forest of Dean District Council. In addition, we are currently undertaking a landscape character assessment and environmental guidelines for the Cotswold AONB, the findings of which will inform the emerging Cotswold AONB Management Plan.

### 1.2 Planning status and background

The Leckhampton land is unallocated 'white land' within the adopted Cheltenham Borough Local Plan and has a long and complex planning history. It was last considered at the 1993 Inquiry into the Local Plan and at this time the Planning Inspector had to assess whether the land should be held as a longer term 'strategic reserve' for development, or whether it should be protected for its own sake.

The Inspector concluded that that the land should not (our underlining) be protected as a strategic reserve but should be protected '*because of its varied topography, landscape history, dense network of footpaths, and pedestrian access from several residential districts.*' He further concluded that it was not necessary in the short term to give the land additional protection through inclusion within the Green Belt, AONB or some other landscape designation, but considered that these options should be explored as part of the next review of the Local Plan.

The land remains unallocated within the emerging Cheltenham Borough Local Plan (Second Review 2002) although in accepting the Inspectors Recommendations to protect the land from development, the Plan includes Policy CO 52 which seeks to resist development on the land through the application of '*a similar policy to that which operates in the Green Belt.*' However, as part of its ongoing review of the Local Plan, Cheltenham Borough Council is considering the potential for additional protection of the land at Leckhampton, and this landscape appraisal has been commissioned to help inform the Councils decision on this issue, and/or any alternative proposals for the area.

### 1.3 Scope of work

The study has been prepared following a desk-based assessment of existing environmental information and a period of field-based landscape and visual survey. Specifically it has comprised:



- A desk based review to identify the extent, location and significance of any environmental planning constraints affecting the land and the surrounding area.
- A landscape survey of the land to record the existing land use, the character and condition of the landscape, the presence of any notable landscape features and relationship of the land to the wider urban and rural environment.
- A visual survey to assess the overall visual prominence of the land from local public vantage points, adjacent residential development, and land within the Cotswolds AONB which lies immediately to the south of the study area.

The conclusions of this survey and appraisal have been drawn together as part of a landscape evaluation which also considers the overall value of the landscape and its sensitivity to change and/or development.

The study draws upon previous landscape reports for the area including survey information and evidence prepared by the Leckhampton Green Land Action Group (Leglag), and other local groups (in so far as this can be verified within the limitations of this study), landscape evidence submitted to the 1993 Local Plan Inquiry, and evidence submitted by Cheltenham Borough Council to the Tewkesbury Borough Local Plan in respect of land proposed for development south of Brizen Farm which lies to the west of the Leckhampton land.

#### 1.4 Study area

The land considered by this study is the area identified on the Local Plan Proposals Map as 'unallocated land' as illustrated on Figure 1. Hereafter, this area will be referred to as 'the study area.'

However, in order to consider the character of the landscape within the context of the surrounding rural and urban edge environment, the landscape and visual survey has addressed a wider study area including land at the urban edge to the north and east, and the landscape of the Cotswolds AONB to the south.

#### 1.5 Methodology

The study has been completed broadly in accordance with recommended guidance as set out in the 'Guidelines for Landscape and Visual Impact Assessment' published jointly in 2002 by the Landscape Institute and the Institute of Environmental Management and Assessment (IEMA), and the Countryside Agency Landscape Character Assessment Guidance for England and Scotland (2002)

All site survey work was completed during Spring 2003 and this report relates to the status and condition of the study area at that time. The visual assessment has been completed from public roads, rights of way and other publicly accessible locations within the surrounding landscape. Views from private land and residential properties have only been appraised where access could be gained. Photographic panoramas have been used to record the character and condition of the study area and the visibility of the area from surrounding locations. All photographs have been taken with a 50mm focal length lens.



## 2.0 LANDSCAPE PLANNING CONTEXT

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### 2.1 Study area location and context

The study area lies at the junction of the Cheltenham and Tewkesbury Borough administrative areas as illustrated on Figure 1. It is located between the southern edge of Cheltenham and the Cotswolds escarpment and AONB which provides a dramatic backdrop to the town to the south and east.

It covers an area of approximately 60 hectares located almost equally to both sides of Kidnappers Lane which crosses the study area from north west to south east linking Farm Lane with Church Road and Leckhampton Road to the south. To the north, the study area is bordered by existing residential development at Warden Hill and Up Hatherley, and by housing and open space to the edge of Leckhampton to the east and south east.

The southern boundary of the study area is defined by Church Road/Leckhampton Lane which lies adjacent to the boundary of the AONB. The study area extends north from the boundary of the AONB to the A46 Shurdington Road which defines the northern boundary and provides the main arterial route into Cheltenham from the south west. The road corridor is defined by extensive residential estates to the north and by open land to the south with the exception of the recent residential development at 'The Lanes' to the west of the study area.

Land to the south west of 'The Lanes' outside Cheltenham Borough is proposed for housing within the emerging Tewkesbury Borough Local Plan as indicated on Figure 1. Cheltenham Borough Council objected to the allocation of this land in representations made to the Tewkesbury Local Plan Public Inquiry which closed in March 2003. In addition, land at Brizen Farm to the west of 'The Lanes' is being promoted for residential development by others, and representations were also made to the Tewkesbury Local Plan Inquiry in respect of this land. The Inspectors recommendations in relation to these two sites is expected in December 2003.

### 2.2 Landscape planning designations

The study area is not covered by any existing landscape designations and remains as an area of unallocated land as defined within the emerging Cheltenham Borough Local Plan and protected by Policy CO 52. Cheltenham Borough Council is however, currently reviewing whether additional protection should be given to the land, and if so, what form that protection should take. This report will be used to inform further consideration of this issue as part of the current local plan review process.

Notwithstanding this, the study area abuts the boundary of the Cotswolds AONB, lies close to the boundary of the Gloucester to Cheltenham Green Belt and earlier studies have referred to a number of important and/or protected features within the study area. As such, a review of existing designations has been completed as part of this study and the current statutory and non-statutory designations affecting the study area, and surrounding area, are described below and illustrated on Figure 1. Given the location of the study area at the junction of two local authority areas, these designations have been identified with reference to both the Cheltenham and Tewkesbury Borough Local Plans and in consultation with Gloucestershire County Council.



### 2.3 Cotswolds AONB

As outlined above, the boundary of the Cotswolds AONB abuts the study area to the south where the land rises significantly toward Leckhampton Hill providing an impressive backdrop to the town. The study area is however, strongly influenced by the character and quality of the adjacent AONB landscape with which there is a high degree of inter-visibility i.e. there are clear views from within the study area across the AONB and vice versa. The nature of this relationship is discussed later in this report.

### 2.4 Green Belt

The study area lies outside the boundary of the Cheltenham to Gloucester Green Belt as designated within the Cheltenham and Tewkesbury Borough Local Plans. The boundary of the Green Belt is however, contiguous with the AONB boundary to the south of the study area as indicated on Figure 1.

The boundary of the Green Belt in the Leckhampton area was set in 1968 although the reasons for its precise alignment are not clear. Amendments to the boundary were made by Tewkesbury Borough Council in 1985 in the Cheltenham Environs Local Plan. In the Deposit version of this plan, the Council had proposed that the study area should also be included within the Green Belt, but this was not endorsed by the Inspector and the land remains undesignated.

However, the longer term inclusion of the Leckhampton land within the Green Belt remains a possibility and the Inspectors report into the 1993 Local Plan Inquiry which considered the need for special protection of the land, concluded that it would not be necessary 'to give the land additional protection in the short term by making it green belt, a landscape conservation area, or part of a new conservation area, although all these options should in my view, be rigorously explored as part of the next review process.'

### 2.5 Special Landscape Areas

Special Landscape Areas (SLA's) were designated by the County Council in the early 1990's as part of a review of the Cotswold AONB boundary in areas which were either removed from the AONB at that time, or were not included within it. The detailed designation criteria are not clear although no SLA's were identified within Cheltenham Borough.

It seems however, that the exclusion of the Leckhampton land from the SLA was largely a result of it not being proposed for inclusion within the AONB. Whilst the County Council have previously advised it felt unable to designate the land as a SLA, it is not clear whether this conclusion was based upon a formal assessment of the land against identified and consistently applied landscape criteria. However, on the basis of this appraisal, the landscape quality of the study area would appear to be entirely consistent with the quality of other Special Landscape Areas within the County.

In the interim, techniques for landscape assessment have moved on and assessments based on measuring the relative quality of different areas have now been largely superseded by a landscape character based approach. This approach is set out in national planning policy guidance (PPG7) which addresses the issue of landscape designations and landscape character, and states in paragraph 2.14, that '*The Government's Policy is that the countryside should be safeguarded for its own sake and non renewable and natural resources should be afforded protection.*'





PPG7 acknowledges the importance of a landscape character based approach which recognises that all landscapes matter and which seeks to identify the differences and distinctions between areas. This approach is central to Countryside Agency guidance set out in its 2002 publication '*Landscape Character Assessment, Guidance for England and Scotland*.' In response to this, a landscape character appraisal of the study area and the wider landscape is included in Section 3.0 of this report.

## 2.6 Protected open space

The study area is segregated from housing to the edge of Leckhampton to the east by the open land at Burrows Sports Field which is protected as Public Green Space under Local Plan Policy GE 36, and by an area of private allotment gardens protected by Policy RC 106.

## 2.7 Scheduled Ancient Monuments

A Scheduled Ancient Monument (SAM) is located within the study area in the field to the north of Church Farm. This is the site of a moat and fishponds dating from the 14<sup>th</sup> Century and as a nationally important monument, is protected by Local Plan policy BE 34. There is evidence of extensive earthworks to the north of the moat outside the scheduled area, which may be medieval in origin and relate to the desertion of the original village in the late 19<sup>th</sup> century.

In addition, the study area contains extensive evidence of pre enclosure agricultural practices in the form of ridge and furrow which survives most notably within Lott Meadow to the east of Kidnappers Lane and are further testimony to the rich cultural heritage still present within the study area.

## 2.8 Listed Buildings

The study area contains 3 grade II Listed Buildings and there are a number of other Listed Buildings in the vicinity, which are indicated on Figure 1.

Within the study area, two listed thatched cottages, Field Cottage and Moat Cottage are located to the west of Kidnappers Lane. The listed farmhouse at Leckhampton Farm lies to the western edge of the study area within a small enclave of new houses now known as Leckhampton Farm Court. Records indicate that Moat Cottage dates from the 16<sup>th</sup> Century and is the oldest surviving cottage in Leckhampton with Field Cottage being only slightly later in construction. Both buildings can be identified on the 1746 Ordnance Survey Plan of the area included as Appendix A. These buildings remain within a strongly rural setting despite recent development around the periphery of the study area.

Immediately beyond the study area boundary to the south 'The Rectory' on Church Lane is Grade II Listed, and the parish church of St Peter and Leckhampton Court to the south of Church Road are both Grade II\* Listed. The church has features dating from the 12<sup>th</sup> and 14<sup>th</sup> centuries and the church spire provides a notable landmark in views toward the AONB from public footpaths within the study area. The presence of these Listed Buildings within and around the study area, together with the ancient monument and features described above, indicates the historical value of the area.



## 2.9 Conservation areas

The study area is not included within a Conservation Area but at its nearest, lies only 120 metres from the southern boundary of the Central Cheltenham Conservation Area as illustrated on Figure 1.

It is understood that the Borough Council may at some stage consider the designation of a new Conservation Area around the historic centre of Leckhampton to the south east of the study area, although no details of this work have been made available to this study.

## 2.10 Nature conservation

The study area is not affected by any statutory or non statutory nature conservation designations but contains nonetheless, a number of locally important features which are identified as habitats for protection within the Gloucestershire Biodiversity Action Plan. These include old orchards '*which are particularly valuable to wildlife especially birds and invertebrates*', and streams and species rich hedgerows, both of which are present within the study area. Further details of the nature conservation interest within the study area are provided in section 4.0 below.

## 2.11 Protected vegetation

The study area contains significant areas of vegetation including hedgerows, treebelts and several magnificent mature trees. Three large mature Oaks in Lott Meadow are protected by a Tree Preservation Order (Ref. TP 321) and a further Preservation Order is in preparation for a belt of mature Poplar to the western edge of Kidnappers Lane.

A detailed hedgerow survey has not been completed as part of this study although many hedgerows within the study area are very well established and appear to follow the line of pre enclosure field systems. It is likely therefore, that a number of hedgerows would be regarded as 'Nationally Important' under the 1997 Hedgerow Regulations. The Regulations include a strong presumption against hedgerow removal, which can only be carried out with the express consent of the planning authority.

## 3.0 LANDSCAPE CHARACTER

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### 3.1 Background

The importance of landscape character in the planning and decision making process has gained considerable weight over recent years and is now recognised at a national level by both central Government and the Countryside Agency as a cornerstone of sustainable development. As a tool, landscape character assessment can make a significant contribution to environmental protection objectives and can be a powerful tool in the planning, design and management of landscapes. It recognises that all landscapes matter and seeks to identify the characteristics that make places different or distinct.

The following text describes therefore, the character of the wider landscape with reference to existing national and regional landscape character assessments. These studies are then used as the basis for assessing the particular character of the land at Leckhampton.

### 3.2 National landscape character

The Countryside Agency and English Nature, with support from English Heritage, have produced the 'Character Map of England'. This combines English Nature's natural areas and the Countryside Agency's countryside character areas into a composite map of joint character areas. The map and supporting descriptions provides the top tier of the hierarchy of landscape character assessment in England and provides the national framework for subsequent character assessments at the regional or district scale.

Reference to this confirms that the study area lies at the junction of two character areas, namely the Severn and Avon Vales (Area 106) and the Cotswolds (Area 107). As such, the study area can be regarded as part of a transitional landscape where the two areas merge, and features of each character area are evident within the study area. This transition can be clearly seen from elevated vantage points within the AONB to the south of the study area.

The Severn and Avon Vales are characterised by flat and undulating landscapes united by the two river valleys. The area contains little woodland, is often very open and has views of prominent hills including the Cotswolds. Orchards are abundant throughout although many older and traditional orchards have been replaced with bush forms and the surrounding poplar shelterbelts are now a prominent feature of the landscape.

By contrast, the Cotswolds are characterised by a dramatic scarp rising above adjacent lowlands with scarp foot villages and beech woodlands. Whilst varied in character, the landscape has an overall unity provided by the honey coloured limestone buildings, beech woods, landscape parks, valley bottom meadows and a strong sense of history evident of a long period of settlement and human activity.

### 3.3 County landscape character

The Countryside Agency Map of England can be used to provide the basis for the preparation of regional and district landscape character assessments, which have now become widely adopted as Supplementary Planning Guidance by many local authorities. To date, no character assessment has been completed for Cheltenham Borough although a recent draft assessment completed by Landscape Design Associates on behalf of Gloucestershire County Council provides an important new resource which will hopefully encourage a programme of further work across the county.



This county study is a broad brush assessment designed for use at the strategic level and still requires verification by the County Council. As such, is not yet available for release or publication. In addition, a landscape character assessment of the Cotswolds AONB has recently been commissioned by the AONB Partnership in association with the Countryside Agency although no details of this study are currently available for use within this assessment.

The initial desk based character assessment of Gloucestershire County, places the study area at the edge of the 'Settled Unwooded Vale' landscape character area close to the junction with the Cotswold escarpment and the main urban area of Cheltenham which lies to the north east. The key characteristics of the vale landscape can be defined as follows:

- Flat or gently undulating landform ranging from 0 - 100m Above Ordnance Datum (AOD).
- A high number of brooks and streams draining neighbouring slopes and uplands areas.
- A mosaic of improved grassland and arable land with small areas of neutral grassland.
- An absence of woodland although small geometric copses and deciduous shelterbelts are conspicuous.
- Evidence of numerous moated sites, mottes and earthworks.
- Medieval churches, farms, houses and tithe barns are conspicuous.
- Numerous footpaths criss-crossing the landscape

In addition, the character description also acknowledges the strong influence that is exerted over wide areas of the vale landscape from the urban centres of Cheltenham and Gloucester.

In general terms, the character of the Settled Unwooded Vale is broadly consistent with the character of the land at Leckhampton although the proximity and visual prominence of the AONB which defines the southern boundary to the study area, and the containment of the area from surrounding built up areas has a significant influence on the character and quality of the local landscape.

### 3.4 Local landscape character

The character of the study area is defined by a mosaic of land uses, vegetation and historical features which combine to create a varied landscape which has a distinctive rural character and a strong sense of place.

The majority of the land is laid to pasture and comprises a network of small to medium sized fields interspersed with areas of mature vegetation and bounded by a network of established hedgerows. Large mature trees, principally Oak, Ash and Willow along field boundaries, and as isolated specimens within fields, are notable features of the local landscape and small areas of remnant orchard provide added diversity. Steams crossing the study area are flanked by belts of native trees and shrubs which provide strong linear features and a diversity of habitats for fauna and flora.

Whilst there are small areas of housing and two active nurseries within the study area, it retains nonetheless, a strongly rural character which is closely linked both physically and visually to the landscape within the AONB immediately to the south. The proximity of the AONB, in conjunction with the high degree of inter-visibility between the study area and the AONB (i.e. there are clear views from within the study area across the AONB and vice versa), and the physical and visual containment of the study area from adjacent built up areas, reinforces the rural character of the study area which is distinct from the main urban area of Cheltenham to the north and east.

The landscape is largely unspoilt by the effects of modern development. Whilst views of surrounding development and infrastructure are possible from certain locations within the study area, these do not dominate and the overriding impression is of an attractive rural landscape.

The character of the study area is also influenced by the presence of numerous historic features including the scheduled ancient monument, 16<sup>th</sup> and 17<sup>th</sup> Century Listed Buildings, evidence of pre enclosure hedgerows, and areas of ridge furrow. These features are of both national and local historic importance adding an extra dimension to the landscape. These qualities were recognised by the Inspector in his report on the 1993 Cheltenham Borough Local Plan inquiry who described the study area as '*a complex mosaic of uses and features, full of historic interest and highly visible from the important Cotswold scarp. It is possible to walk on rural public footpaths from virtually the edge of the Central Conservation Area (CCA), to the top of Leckhampton Hill, passing through some very attractive landscape, such as Lott Meadow.*'

### 3.5 Landscape quality and condition

The landscape of the study area is largely intact and provides a strong sense of character which is relatively unaffected by significant intrusive or detracting features. The majority of trees and hedgerows are in good condition, fields are actively used and managed and streams, fences and footpaths are well maintained. Although areas of modern development at Leckhampton Court Farm, Church Farm and Vineries Close are clearly visible from areas within the study area, this development influence only small parts of the study area and has no significant urbanising effect on the character of the landscape.



## 4.0 LANDSCAPE SURVEY

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### 4.1 Introduction

Previous studies of the study area over recent years have provided a wealth of detailed information on the nature and condition of the existing landscape and historic importance and its value as a refuge for wildlife. However, some of this information is now several years old and changes may have occurred within the study area over the intervening period. As such, a field based landscape survey was carried out as part of this study during Spring 2003 in order to record the current status of the study area. The conclusions of this survey are summarised below and illustrated on Figure 2.

### 4.2 Landform

The study area lies at the foot of the Cotswold escarpment and falls steadily to the north from 90m AOD to the south, to approximately 70m AOD to the north. To the east of Kidnappers Lane the land falls relatively evenly at a gradient of about 1:50, whilst to the west of the lane, the landform is more varied and undulating due in part to the presence of Hatherley Brook which lies within a narrow valley passing through the western study area.

### 4.3 Land use

The study area contains a variety of land uses including pasture, market gardens, old orchards, watercourses and areas of built development including residential properties and two active plant nurseries along Kidnappers Lane as illustrated on Figure 2. The majority of land is laid to pasture and used for the grazing of livestock including pigs, cattle and goats. Lott Meadow to the east is crossed by several footpaths and also appears to be used as an area of informal public open space.

To the west of Kidnappers Lane, a patchwork of small fields enclosed by dense hedgerows is punctuated by old orchards and divided by a belt of vegetation along the banks of Hatherley Brook which is a significant feature of the local landscape. With the exception of the housing at Leckhampton Farm Court and the buildings at Church Farm Business Centre, development to the west is limited to a few isolated cottages and houses along Kidnappers Lane.

To the east, Lott Meadow is a large open field which is bounded to the east by a significant belt of vegetation along Moorend stream and by a dense hedgerow to the north west. To the north, the field pattern is smaller scale and the land is in mixed use including pasture, orchard and an area of market gardens and smallholdings to the north east corner of the study area. This area contains a number of small sheds and outbuildings and is visually discrete from the remainder of the study area to the south due to the presence of established hedgerows to the south and east.

Two garden nurseries are still in operation within the study area, both located along of Kidnappers Lane, and a children's nursery (Nursery Rhymes) can be found at the bend in the lane. The nurseries include glasshouses and a range of outbuildings which are partially visible from the lane but which are generally well screened by perimeter vegetation and do not therefore, intrude significantly upon the rural character of the study area.

#### 4.4 Watercourses and drainage

The study area is crossed by two watercourses both of which retain a natural profile and are flanked by significant belts of tree and scrub vegetation. Hatherley Brook flows through the west of the study area in a northerly direction crossing Kidnappers Lane before exiting under the A46 and continuing into the residential estates at Hatherley. It is bordered by mature native trees and scrub and provides an attractive and substantial green corridor through the study area.

Moorend Stream is a smaller, shallower watercourse which meanders along the eastern boundary of the study area between Lott Meadow and Burrow's Field. To the north, the course of the stream is defined by a significant belt of vegetation to both sides which contains a number of large, mature Oak, Ash and Willow trees. To the south, the vegetation becomes thinner and sparser and has recently been subject to a degree of felling and clearance. Based on a visual assessment in March 2003, the water quality to both streams appears good.

Drainage ditches run beneath a number of hedge lines and along the edges of fields. A localised depression to the southern edge of Lott Meadow was flooded at the time of survey and the ground flora suggests that this area is regularly under water.

#### 4.5 Trees and woodland

The study area is well vegetated and contains a comprehensive network of hedgerows, treebelts and individual trees as indicated on Figure 2. The most significant belts of vegetation occur along the two watercourses but most notably along Hatherley Brook. Here native hedgerows and scrub provide an understorey to large Ash, Oak and Willow trees which define a strong green corridor through the study area.

Elsewhere, stands of mature Poplar occur to the north of Moat Cottage and two mature Lombardy Poplars mark the entrance to the cottage. Mixed treebelts occur to the south around 'The Rectory' and a row of pollarded Willows line a field boundary to the north west of the Church Farm Business Centre. A row of mature Poplar occur along the western edge of Kidnappers Lane and a stand of Scots Pine in the garden of 'The Nurseries' provide a notable feature.

Individual fields contain isolated mature and semi mature trees, usually Oak or Horse Chestnut, and Lott Meadow contains three mature Oak trees which appear to be a remnant of a much earlier field boundary system. These trees are notable features within the local landscape and dominate the foreground to views across the AONB to the south. Areas of remnant orchard to the north east and south west of the study area provide added variety and contribute to the overall green character of the landscape.

#### 4.6 Hedgerows

The study area contains a network of native hedgerows which define field boundaries and the boundaries of the study area with the surrounding roads and lanes. The hedgerows are dominated by hawthorn and are generally in good condition, particularly the hedgerow around the north western edge of Lott meadow, and hedgerows along Kidnappers Lane and western areas of the study area. These hedgerows make a significant contribution to the character of the study area and the rural lanes. Some variation does however exist and hedgerows to the north east around the area of market gardens are lower ranging from 1.2 -2 m high and maintained as agricultural hedges. To the south and east the hedgerows become more fragmented with gaps and sections of post and wire fencing, they are more diverse in species primarily containing hawthorn, blackthorn and field maple.



#### 4.7 Nature conservation

A Phase 1 ecological survey of the study area was completed by members of Leglag in 1995 under the direction of the Gloucestershire Wildlife Trust. This study provided a record of the study area at that time and has been acknowledged by GWT as being a very useful addition to the local wildlife record. Whilst no dedicated ecological survey has been completed as part of this study, the survey work confirms that there have been few significant changes to features recorded for the study area in 1995. As such, it is reasonable to assume that the study area retains the same degree of interest for wildlife.

The landscape of relatively small parcels of land including the mosaic of land uses described above delineated by streams, hedgerows, tracks and lanes provides a good variety of habitats typical of a small scale mixed farm landscape. This landscape will support a good range of birds and other wildlife typically associated with less intensely managed farmland.

Some of the hedgerows support mature native trees and a variety of native shrubs. In places, the ground flora contains species such as dog's mercury, bluebell and wood garlic, which combined with the diverse range of trees and shrubs, suggest long standing hedgerows and field boundaries. Given previous records and sightings of road casualties by local wildlife recorders, the study area is likely to be being used for foraging badgers and the mosaic of habitats provides feeding and possibly roosting habitat for one or more species bat.

#### 4.8 Rights of way

The site is crossed by a number of public footpaths which link into a wider network of paths extending east, west and south into the AONB including the Cheltenham Circular Footpath. The network of paths is well connected to the urban edge to the east with a number of access points along Merlin way and across the Burrow's Field.

Within the study area, three footpaths cross Lott Meadow and with the exception of sections of the footpath along Moorend Stream which is partially enclosed by vegetation, none of the paths are bounded by hedgerows and are thus visually open to the land within the study area. To the west of Kidnappers Lane, footpaths provide access across the study area to Farm Lane to the west and Church Lane to the south where they connect with footpaths within the AONB to the south which rises toward Leckhampton Hill.

#### 4.9 Agricultural land quality

A survey of the agricultural land quality within the study area was completed by ADAS on behalf of MAFF in 1995 as part of its statutory role in the preparation of the Gloucestershire Structure Plan. The results of this survey are illustrated on the Agricultural Land Classification Map included as Appendix B.

Reference to this, and the supporting schedule, confirms that that over 29% of the agricultural land within the study area was grade 2 quality, with a further 8.4% classified as grade 3a. This best and most versatile land runs broadly through the centre of the study area on both sides of Kidnappers Lane and is surrounded by areas of Grade 3b land which make up the remainder of the land excluding buildings and other non agricultural uses.

## 5.0 VISUAL APPRAISAL

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### 5.1 Introduction

An assessment of the visual prominence of the study area within the surrounding landscape is an important consideration in any assessment of the sensitivity of a landscape to change and/or development. Earlier studies have made reference to the visual prominence of the study area from certain vantage points but have not always been underpinned by a systematic or structured approach to visual assessment.

A visual assessment has therefore, been carried out as part of this study in order to establish the nature and significance of views to and from the study area. This assessment has been completed following a period of field survey in Spring 2003 which considered views of the study area from the following key locations:

- Local rights of way and public open space
- Open land and rights of way within the AONB
- Surrounding roads and lanes
- Nearby residential areas

The conclusions of the visual assessment are summarised below and illustrated by the photographs on Panels A, B and C at the back of this report. The location of each photographic viewpoint is indicated on Figure 3.

### 5.2 Views from local rights of way and open space

The study area is crossed by several public footpaths which link Leckhampton with the countryside within the AONB to the south. There are clear views across the study area from the majority of these footpaths and impressive views toward Leckhampton Hill and the AONB with which there is a high degree of inter-visibility.

To the east of Kidnappers Lane, three footpaths cross Lott Meadow and there are clear and uninterrupted views north across the meadow (Viewpoint 1), and impressive views south toward the rising land within the AONB (Viewpoint 2). From these locations the study area provides the foreground to views of Leckhampton Hill which forms a dramatic backdrop to this edge of the town reinforcing the rural character of the study area.

Further north, a public footpath crosses the study area from east to west defining the boundary between the market gardens to the north, and the pasture and remnant orchards to the south. Whilst sections of the path are screened by adjacent hedgerows, there remain nonetheless, clear views across the study area to the north (Viewpoint 3) and views south to the AONB (Viewpoint 4).

Four footpaths cross the study area to the west of Kidnappers Lane the majority of which pass through open fields and afford views north and south across the study area and toward the AONB. There are clear views of the Listed Buildings at Moat Cottage and Field Cottage and views of historic buildings along Church Road (Viewpoints 5 and 6).



Vegetation along Hatherley Brook screens views of the residential estates to the west of the study area from the majority of footpaths, although recent housing including the Listed Buildings at Leckhampton Farm Court are clearly visible from locations to the west of the brook. In addition, the development at Church Farm Business Centre is clearly visible from footpaths to the west of the study area although this is seen against the backdrop of the AONB and does not intrude significantly on the overall view.

Elsewhere, detached houses along Kidnappers Lane are visible from the lane and footpath locations to the south, and the northern edge of housing at Vineries Close is clearly visible from footpaths within Lott Meadow. The two commercial nurseries within the study area are however, relatively well screened by established vegetation and are not widely visible within the local landscape or the study area

Views across the eastern part of the study area are possible from the public footpath and open space at Burrow's Field to the edge of Leckhampton (Viewpoint 7). From here, the internal study area is visible through the vegetation along Moored Stream and the large Poplar trees along Kidnappers Lane provide a notable landmark within the local landscape. There are no significant views of the study area from the allotments to the south of the Burrow's although there are glimpses of the tops of trees within the study area from the north western edge.

### 5.3 Views from the AONB

The study area is visually prominent from a number of locations within the AONB to the south of the study area including footpaths on the escarpment footslopes, footpaths along the scarp edge at Leckhampton Hill, and open land at Leckhampton Common.

South of the study area boundary with Church Road, two footpaths rise up the Cotswold escarpment within the AONB linking paths within the study area to Leckhampton Hill. There are panoramic views across the entire study area from both footpaths although these are most significant from the footpath to the south of St Peter's Church. The nature of these views is illustrated on viewpoint photographs 8 and 9. From these locations the landscape within the AONB and Green Belt merges almost seamlessly with the landscape within the study area which is perceived as an integral part of the rural landscape which defines this edge to Cheltenham. From these elevated vantage points the small areas of existing housing and commercial development within and adjacent to the study area have little influence on the overall character and quality of the views which remain strongly rural.

Further to the south and east the landform continues to rise steeply toward Leckhampton Hill and a number of footpaths run along the top of the escarpment and through the open land at Leckhampton Common. Those footpaths along the lower scarp are contained by dense woodland which precludes long distance views out including those north toward the study area.

However, as the landform rises above the tree line, there are clear and uninterrupted views north across the study area from a number of locations including the footpath and topograph near Devil's Chimney (Viewpoint 10), and the public bridleway along the scarp edge further east (Viewpoint 11). In addition, there are glimpsed views of the study area from the road along Leckhampton Hill (viewpoint 12). From these vantage points the study area is seen as a spur of land which penetrates the urban edge of the town but which is distinct from it, and which merges with the landscape within the AONB and Green Belt to the south and west.

#### 5.4 Views from local roads and lanes

The study area is bounded by roads to three sides namely Shurdington Road to the north, Farm Lane to the west and Church Road to the south. Kidnappers Lane passes through the centre of the study area and the Merlin Way defines a section of the boundary to the north east.

From the majority of locations along Farm Lane, Merlin Way and Church Road, views into the study area are precluded by the presence of tall, dense hedgerows along the boundaries. These hedgerows provide a high degree of physical and visual separation between the study area and the adjacent residential areas and contribute to the rural character of the area. Views into the study area are however possible where gaps in the boundary vegetation occur along Farm Lane (Viewpoint 13), Kidnappers Lane (Viewpoint 14) and Church Road (Viewpoint 15).

The most significant views into the study area are gained from the A46 Shurdington Road where this passes along the northern boundary between 'The Lanes' development to the west and the study area boundary to the north east. From here, the foreground view is dominated by areas of pasture and market gardens within the study area across which there are impressive views toward the Cotswold escarpment and Leckhampton Hill. (Viewpoint 16). From these locations, the study area provides an important part of the approach to the town from the west affording clear views across the study area to the Cotswold escarpment, reinforcing links between the town and its landscape setting.

#### 5.5 Views from residential areas

Views across the study area from surrounding residential areas are restricted by the screening effect of hedgerows and treebelts which provide a strong edge to the study area segregating it from the surrounding built up areas.

There are no significant views into the study area from residential areas at Warden Hill and Hatherley which lie to the north of the A46, or from housing at Merlin Way and Arden Road to the east. Views from Farm Lane are restricted by the hedgerow along the western boundary although there are views over this hedge toward Leckhampton Hill from sections of the lane, and views will be possible from first floor windows of the older houses along the western road edge.

A number of properties at Leckhampton Farm Court, including the main Listed farmhouse, face directly onto the study area although views from these properties are largely restricted to the land west of Hatherley Brook and to vegetation further east along Kidnappers Lane. Properties along the northern edge of Church Road back onto the study area and views north can be gained from the 'Rectory' and from the rear gardens and elevations of housing at Vineries Close. To the south of Church Road a short row of houses face toward the study area and have views into the south western study area. There are no significant views of the study area from residential areas further east along Church Road or from the centre of Leckhampton.

Views of the study area from houses at Leckhampton Hill and from Leckhampton Court, have not been assessed due to the restrictions of access to these properties.

#### 5.6 Views out from the study area

As outlined above, the study area is well contained by established vegetation along its eastern and western boundaries and there are no significant views out in these directions. This vegetation provides a high degree of containment providing a clear break between the study area and the adjacent residential areas.

The northern boundary of the study area is defined by Shurdington Road, although the road and its associated traffic, is only visible from areas to the north west and the road has little influence upon the overall character or quality of the landscape.

By far the most dominant views from the study area are south across the landscape of the AONB and Leckhampton Hill. These views, combined with the rising landform, are a highly distinctive feature of the study area and are integral to the character and quality of the local landscape. These views link the study area very strongly to the landscape of the AONB reinforcing its rural character and providing a strong and distinctive sense of place.



## 6.0 LANDSCAPE EVALUATION

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### 6.1 Introduction

This section of the report draws together the key findings of the review of the landscape planning context, landscape character appraisal, landscape survey and appraisal, and the visual appraisal in order to evaluate the landscape value and sensitivity of the Leckhampton site. The conclusion of this evaluation will be used to assess the sensitivity and value of the landscape.

### 6.2 Landscape planning context

Although not covered by any specific landscape or ecological designations, the study area forms an important part of an attractive rural landscape which is relatively unspoilt by modern development and which lies directly adjacent to a nationally important landscape, the Cotswolds AONB.

AONBs are our finest landscapes and are designated, alongside National Parks, to mark them out for special protection and management. This study has not included an assessment of the Leckhampton land against AONB designation criteria which is a matter for the Countryside Agency to consider as part of any future review of the AONB boundary. The Countryside Agency has notified the Borough Council that there is no early prospect of a Cotswolds boundary review.

This appraisal has however, confirmed that the study area is closely linked physically to the landscape of the adjacent AONB, being no more than a few metres from the AONB boundary, and connected to it via a network of streams and public footpaths. These links are reinforced by the high degree of inter-visibility between the AONB and the study area which provides the foreground view and setting to the AONB from a number of public vantage points. In this context, the study area is considered to be highly sensitive to change or development, particularly to the central and southern areas where development would adversely affect the AONB.

The importance of this issue is recognised by the Countryside Agency in its national guidance on AONBs 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 emerging Local Plan which relates specifically to development adjoining the AONB.

### 6.3 Environmental constraints

The study area contains a number of environmental constraints including a Scheduled Ancient Monument, three Listed Buildings, numerous public footpaths, protected trees, and important hedgerows. In addition, the site contains areas of ridge and furrow, remnant orchard and has strong historic associations with the original settlement of Leckhampton. Some of these features are nationally protected and are evidence of the rich cultural heritage of the area. They are important and valued components of the local landscape which should be preserved.



These features are integral to the character of the study area and cannot be viewed individually or in isolation. For example, the Listed Buildings are intrinsically linked to the surrounding landscape which provides their setting, and the protection of the character of the landscape is fundamental to the protection of the setting of these historic and protected buildings. Similarly, the views to the AONB afforded from footpaths across the study area are equally as important as the access and recreational opportunities that these paths provide. Whilst these features may not in themselves present an overriding constraint to development, they do in combination, impose a significant constraint to development across large parts of the study area.

Whilst the landscape to the northern edge of the study area is in use predominantly as market gardens is relatively free from these constraints, the views across this land to Leckhampton Hill and the AONB are an important part of the main gateway into Cheltenham from the south west. These views would be lost were built development permitted in this part of the site.

#### 6.4 Landscape character and value

The study area lies within a transitional landscape at the point where the Severn and Avon Vales merge with the Cotswold escarpment. Whilst the landscape is broadly consistent with the characteristics of the Settled Unwooded Vale, it is not significantly influenced by surrounding built up areas or transport corridors and retains a strongly rural character, reinforced by the strong links with the landscape of the Cotswolds AONB which adjoins the southern boundary of the area.

At a local level, the study area is perceived as a mosaic of land uses, vegetation and historical features which combine to create a rich and varied landscape which has a strong and distinctive sense of place. With the exception of small areas of unmanaged land and redundant buildings, the landscape is generally well managed and in good condition. Hedgerows are generally broad, dense and intact and there are many fine examples of mature trees within the site which provide interest and diversity to the landscape. Listed Buildings within the site contribute to the sense of character and an added historic dimension.

The landscape has a high scenic value and provides the setting to the Cotswold escarpment to the south when viewed from a number of public footpaths, local roads and residential properties. The landscape character remains intact and largely unspoilt by the effects of modern development or other detracting or urbanising influences. Whilst the study area does contain development, this is small scale and typical of the range of land uses found in rural landscapes at the urban fringe. Clear views of modern development outside the study area are limited to a few areas, most notably at Vineries Close and Church Farm Business Centre. As such, the site is well contained from surrounding urban areas and is not perceived as part of the urban fringe of Cheltenham.

In considering the value of this landscape against Countryside Agency criteria, the study area can be regarded as having a high landscape value indicative of landscapes requiring special attention and/or protection.

#### 6.5 Landscape features

The study area contains many notable landscape features including a network of established hedgerows, treebelts and mature specimen trees and two watercourse both flanked by linear mature trees and native shrubs.

A number of trees are protected by preservation orders and it is likely that many of the older hedgerows would be defined as Nationally Important under the 1997 Hedgerow Regulations. Vegetation along the site boundaries provides a high degree of containment to the site segregating it from adjacent residential areas and screening views of the A46 Shurdington Road from the majority of the study area. These features are rapidly being lost through changing agricultural practices and the release of land for development. In areas where a network of features remains intact, these should be protected for their landscape and nature conservation value.

## 6.6 Nature conservation

The study area is not affected by any statutory or non statutory nature conservation designations but provides nonetheless, valuable habitats for a diversity of fauna and flora including a number of features which are identified as habitats for protection within the Gloucestershire Biodiversity Action Plan.

Whilst no dedicated ecological surveys have been completed at this stage, the site survey work has confirmed a mosaic of land use and a network of streams, hedgerows, tracks and verges which provide green corridors across the study area and a variety of habitats typical of a small scale mixed farm landscape. Features of value include the many mature trees, established hedgerows and tree groups, watercourses, orchards, meadow and wildflower verges.

This combination of features together with the relatively tranquil and undisturbed nature of the study area indicates that it is likely to be valuable to a wide range of species including bats, mammals, birds, invertebrates, and native flora. This is supported by previous records for the site which indicate an abundance of wildlife.

## 6.7 Public access and recreation

The network of public footpaths across the study area are well linked to both the urban edge and the wider network of footpaths to the south and south west and provide a recreational resource for local people which is well used and actively promoted by the Leglag publication 'Country Walks in and around Leckhampton'.

In addition, the Cheltenham circular footpath passes through the study area. This is a 25 mile route based on existing rights of way and passing through attractive countryside around the town. It is an important recreational resource which forms the basis for an annual charity event. Whilst it may be possible to retain a number of footpaths within any development proposal for the site, there would be a significant adverse impact on the character and amenity of these paths.

## 6.8 Visual prominence

The study area is highly visible from the network of rights of way which cross the site and from at least three Listed Buildings. Whilst the study area is screened from the majority of surrounding roads and lanes by established hedgerows, views are possible from a number of locations where there are gaps in the roadside vegetation. The site is however, openly visible from a section of the A46 where it is seen as the foreground to views of Leckhampton Hill and the AONB which are an important feature of this approach into Cheltenham, reinforcing the links between the town and its distinctive landscape setting.

In the majority of these local views the study area is seen as the foreground to the landscape of the AONB with which there is a high degree of inter-visibility. Whilst existing development is visible in a number of views, this has little influence on the overall character of the view and the study area is perceived as part of the wider rural landscape and distinct from the urban area of Cheltenham.

The study area is also highly visible from locations within the AONB to the south of the site. From footpaths to the lower scarp slopes there are open views across the entire study area which is seen as a continuum of the landscape of the AONB which falls steadily north and which provides the landscape setting to this edge of the town.

From more elevated vantage points on the upper scarp slopes of Leckhampton Hill and the open land at Leckhampton Common, there are panoramic views across the Severn Vale and Cheltenham. From here, the study area is seen as the part of the foreground view at the foot of the Cotswold scarp and is perceived as an integral part of the wider landscape of the AONB and Green Belt, distinct from the urban environment to the north and east.



## 7.0 SUMMARY AND CONCLUSION

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### 7.1 Summary of landscape sensitivity

The study area forms an important part of an attractive rural landscape, which retains a strong sense of character and is largely unspoilt by the effects of modern development. It is constrained by a number of landscape and historic features, provides the setting to three Listed Buildings and is closely linked to the landscape of the AONB to the south, from which it is highly visible. It contains a diversity of land uses and landscape features including arable farmland, pasture, orchards, tree plantations, hedgerows, watercourses and streams and is of potentially high ecological value.

It is a landscape of high scenic quality which can be easily accessed from Leckhampton and the Central Conservation Area. It is well used by local people for access to the wider countryside and for informal recreation. In addition, it contributes to the setting of the AONB and Leckhampton Hill, and the character of the main approach to Cheltenham from the south west. It is therefore, an area of high landscape value which is considered particularly sensitive to change or development.

The study area has previously been promoted for residential development in representations made to the 1993 Cheltenham Borough Local Plan Inquiry. Given the unallocated status of the land, this pressure seems likely to continue in future. Indeed there are objections to the current review which seek the allocation of the study area for mixed use development. This landscape appraisal has identified the site as an attractive rural landscape which has a strong sense of character and which is highly visible from the Cotswolds AONB and other locations.

Whilst the study area may be able to accommodate small scale development through the redevelopment or conversion of individual buildings, any larger scale development would adversely affect the character and quality of the landscape and significantly diminish the value of the area as a resource for local people. This view was endorsed by the Inspector in the report and recommendations on the 1993 Cheltenham Local Plan Inquiry who, in considering the land at Leckhampton concluded that *'it would be very sad indeed if development were to proceed at Leckhampton, with its variety and interest'* and who recommended therefore, that the land should be protected not as a strategic reserve, *'but because of its varied topography, landscape history, dense network of footpaths, and pedestrian access from several residential districts.'*

### 7.2 Conclusion

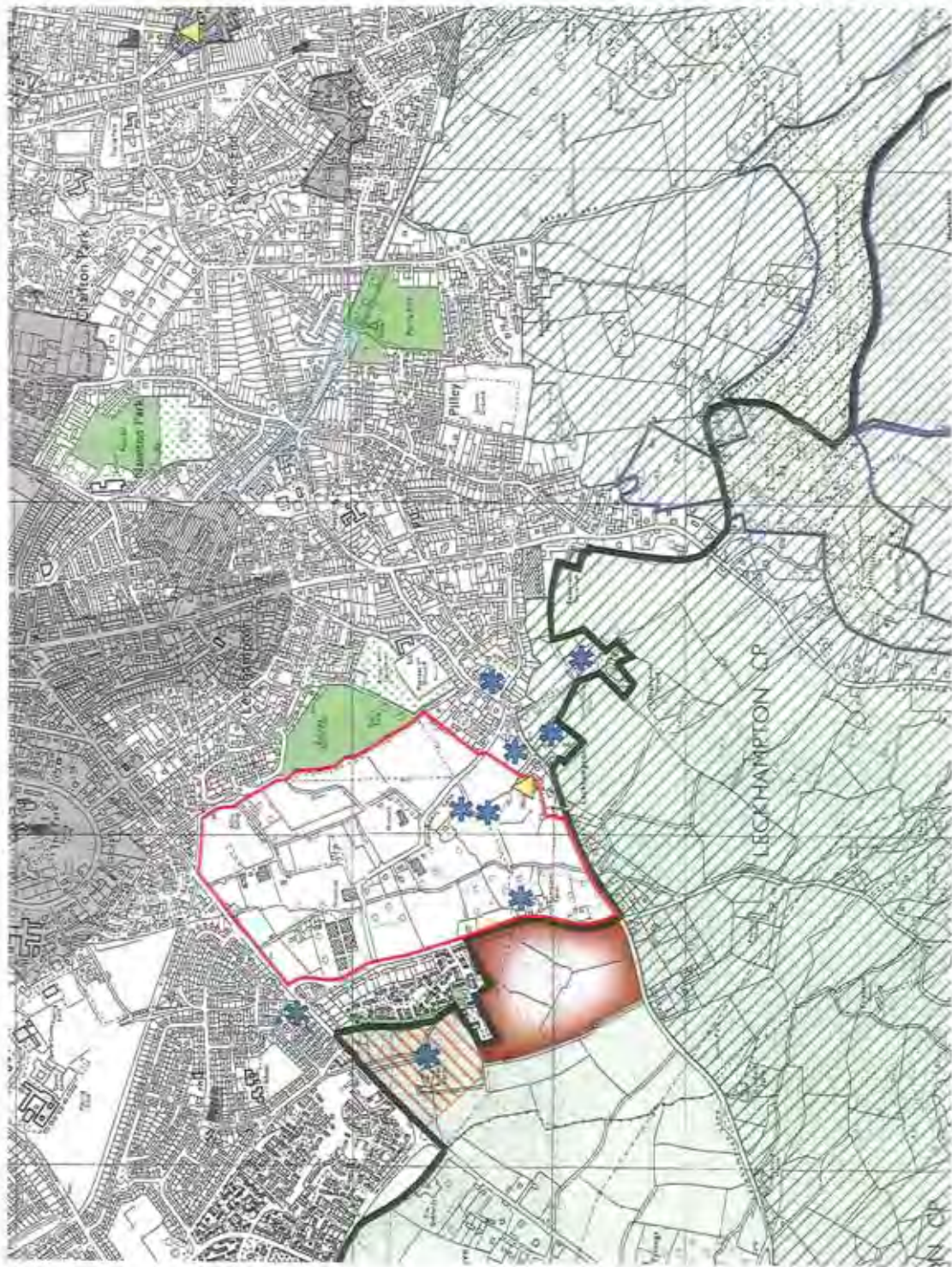
The landscape character and value of the study area derives from the strongly rural and largely unspoilt character of the landscape, the condition and diversity of existing landscape features, the relationship of the landscape with historic buildings and features, the character of the local lanes, the visual prominence of the landscape in views to and from the AONB, and the contribution the area makes to the setting of Leckhampton Hill and the character of the main gateway into Cheltenham from the west.

It represents a valuable and sensitive landscape which is well used by local people as an area of countryside close to the urban area within which large scale development would be visually intrusive and adversely affect views to and from the Cotswold AONB. Whilst the site could accommodate small scale change and development, it is considered highly vulnerable to the effects of large scale development. The protection of the landscape should therefore, continue to be the primary objective.



# Land at Leckhampton

Figure 1 Environmental Planning Context



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## Figure 2 Landscape Survey



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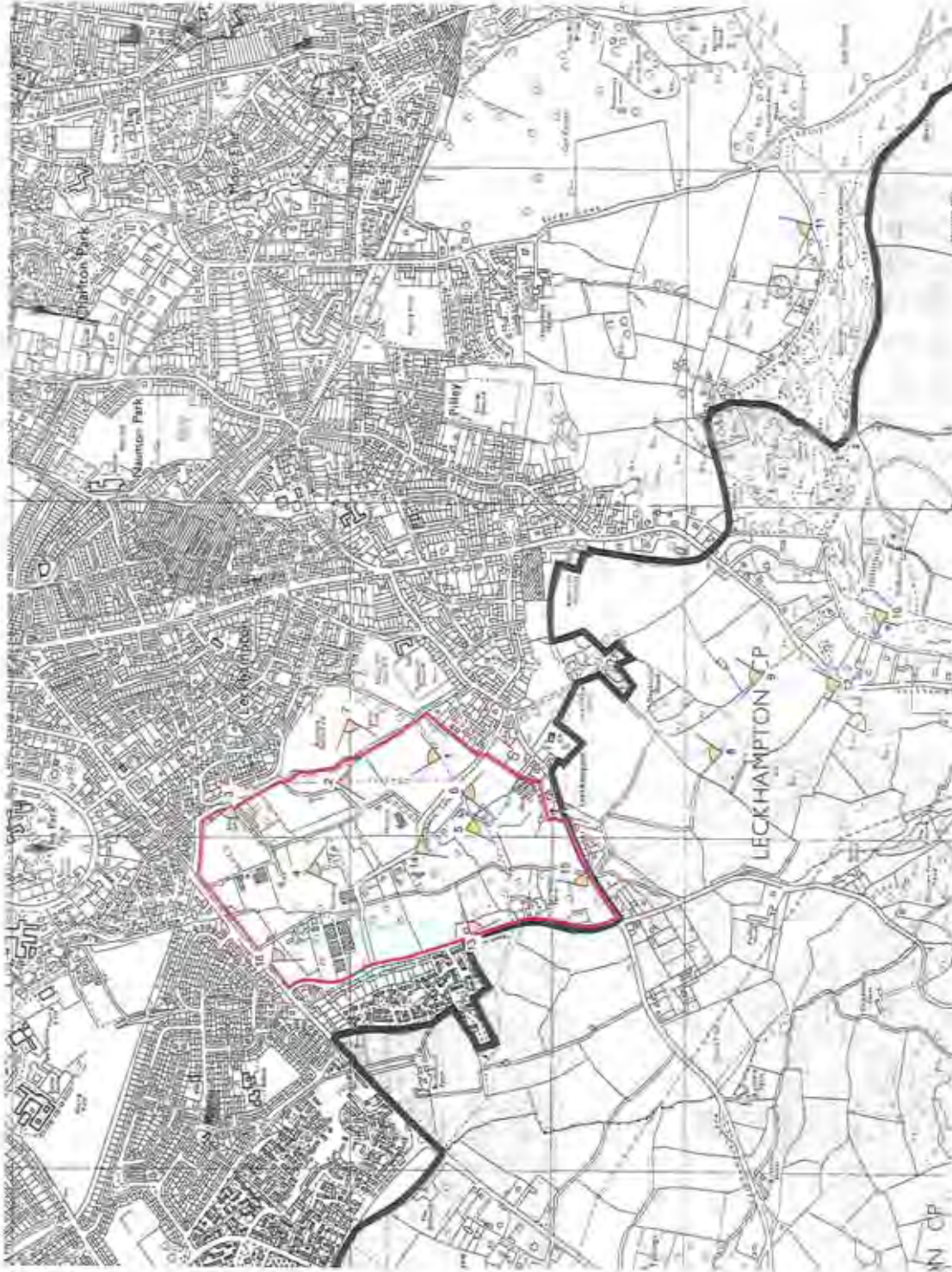
LANDSCAPE DESIGN ASSOCIATES

Fax : 01643 887053



## Figure 3 Viewpoint Locations

Figure 3 Viewpoint Locations



Based upon Question: Survey with 100% response  
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Dental Association of the United States, 1999

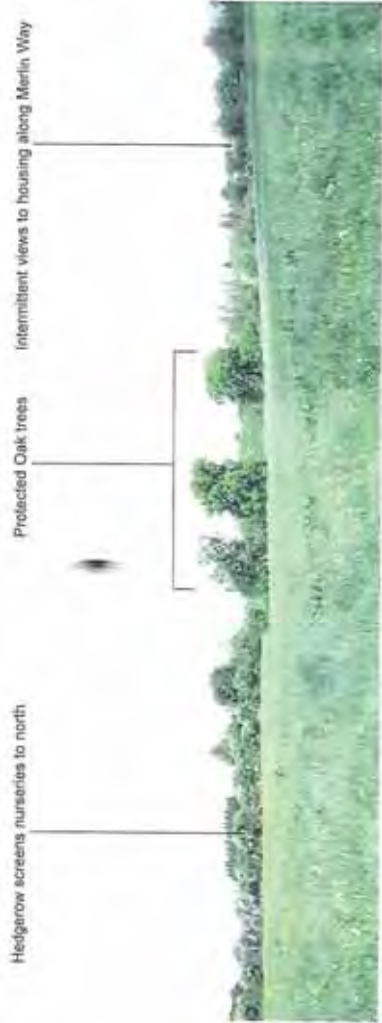
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**FIGURE 2**  
**FIGURE 3**





Photograph Viewpoint 1: Looking north east across Lott Meadow  
Small agricultural outbuildings in active use



Photograph Viewpoint 3: Looking west across market gardens from public footpath



Photograph Viewpoint 5: Looking south from public footpath across study area to AONB and Leckhampton Hill



Photograph Viewpoint 2: Looking south across Lott Meadow to AONB



Photograph Viewpoint 4: Looking south from footpath north from Robinswood Cottage



Photograph Viewpoint 6: Looking south from footpath and access track to Field Cottage

Photograph Panel A

DATE	MF	JAA	MF	DATE	JUNE 03
SCALE	1:2000		Final	DATE	17062004A

Land at Leckhampton



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02/04  
MAY 2004





Photograph Viewpoint 7 : Looking west toward study area from Burrows Field

Leckhampton Court Farm  
Fields to west of study area adjacent to Little Vatch  
Church Farm Business Centre to southern boundary of site  
Lott Meadow  
Burrow's Field



Photograph Viewpoint 8 : Looking north from footpath to lower scarp slopes

Western boundary of study area  
Vegetation along Hatherley Brook  
Lott Meadow  
Burrow's Field



Photograph Viewpoint 10 : Looking north from Leckhampton Hill

Land to the west of Kidnappers Lane

Photograph Viewpoint 9 : Looking north from footpath to upper scarp slopes

Lott Meadow  
Burrow's Field  
Study area to west of Hatherley Brook  
Church Farm Business Centre to southern boundary of site  
Mature poplar along Kidnappers Lane



Photograph Viewpoint 11 : Looking north west from Leckhampton Common



Photograph Viewpoint 12 : Looking north from road at Leckhampton Hill

# Photograph Panel B

Drawn: MF Date: June 03  
Scale: 1:1000 Final Date: 17/06/04

## Land at Leckhampton

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Ref: LANS 00000





Photograph Viewpoint 13 : Looking south east across the study area from Farm Lane



Photograph Viewpoint 14 : Looking south from Kidnappers Lane at junction with public footpath



Photograph Viewpoint 15 : Looking north into the study area from Church Road



Photograph Viewpoint 16 : Looking south across study area from the A46 Shurdington Road

Photograph Panel C

DATE	MF	JAF	MF	SAS	June 03
SCALE				Final	Draw No: 1755L004A

Land at Leckhampton

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Ref: 01/04/03 000000

Appendix A

Copy of tracing of 1746 Ordnance Survey Map  
prepared by Mr K Pollock for Cheltenham Civic Society

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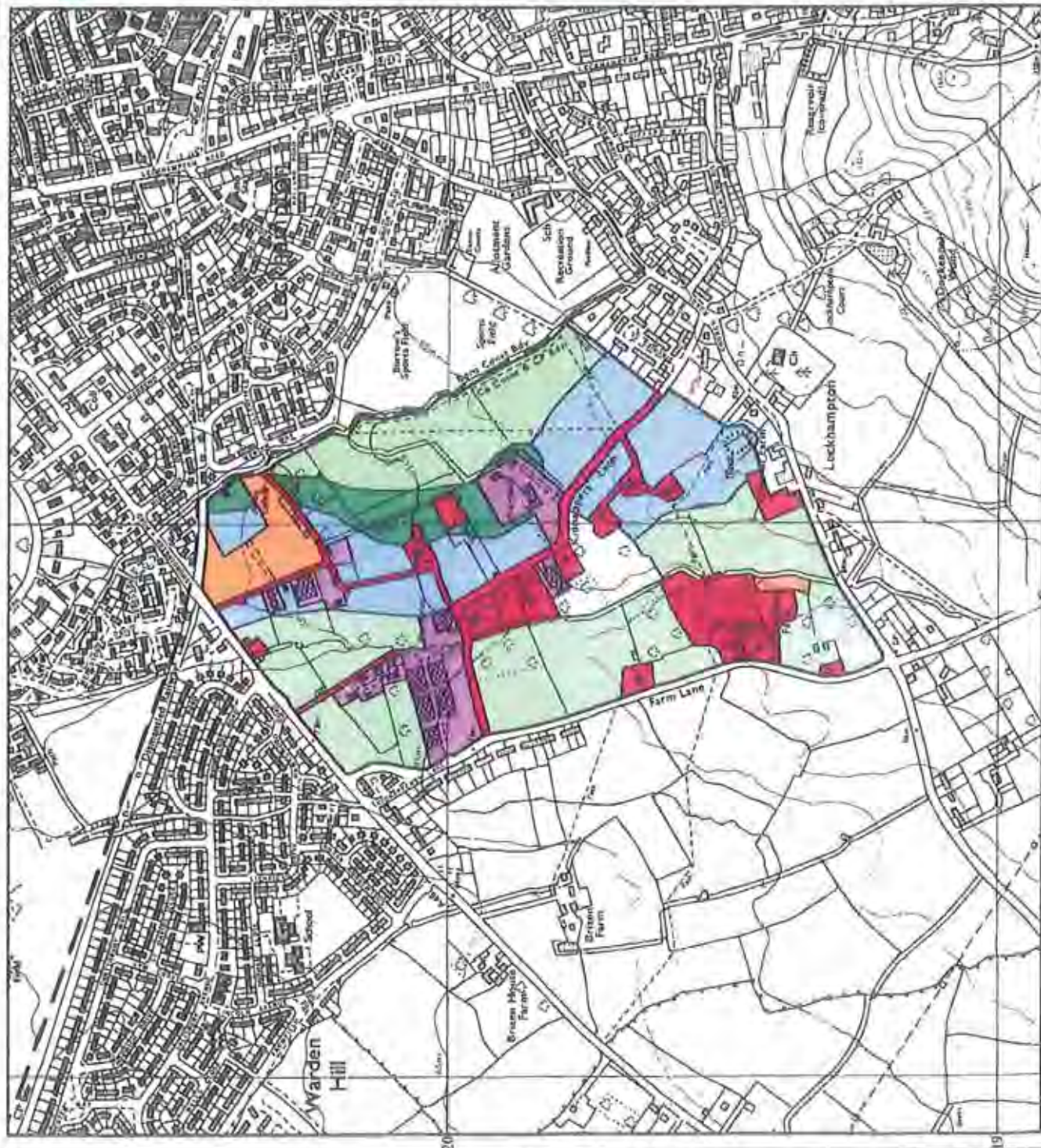
MAP 3

White Cross Corner



Appendix B  
Agricultural Land Classification Map and schedule for the study area

**Leckhampton  
Cheltenham**



Agricultural Land		
Grade	Quality	Area (ha)
1	Excellent	0.0
2	Very Good	12.2
3a	Good	3.5
3b	Moderate	25.8
4	Poor	0.0
5	Very Poor	0.0

Other Land Categories	
Urban	8.5
Non-Agricultural	2.7
Woodland	0.0
Agricultural Buildings	3.5
Open Water	0.0
Not Surveyed	2.0
Total agricultural land area	
Total survey area	

a. Grade Accuracy was assessed within survey area

Further details contained in MAFF 1980 Agricultural Land Classifications of England and Wales. Several publications and criteria for grading the quality of agricultural land. MAFF publications, January 1979. The information is accurate as far as possible and any change would be inaccurate. Reproduction is done as it is (not by the owner) without the prior permission of MAFF.

carried & done by the Riverside Planning Team, ADAS Research Unit. These findings from the 1996 Yorkshire Survey confirm work with the institutions of the Commission on the Macroeconomic Effects of Manufacturing relocations in/through Germany. The report will also lead to presentation at 1999 proceedings.

Suzanne Wajsbort  
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## LECKHAMPTON, CHELTENHAM

### AGRICULTURAL LAND CLASSIFICATION SURVEY

#### SUMMARY

The survey was carried out by ADAS on behalf of MAFF as part of its statutory role in the preparation of the Gloucester Structure Plan. The fieldwork at Leckhampton was completed in October 1995 at a scale of 1:10,000. Data on climate, soils, geology and from previous Agricultural Land Classification (ALC) Surveys was used and is presented in the report. The distribution of grades is shown on the accompanying ALC map and summarised below. Information is correct at this scale but could be misleading if enlarged.

Distribution of ALC grades: Leckhampton, Cheltenham

Grade	Area (ha)	% of Survey Area	% of Agricultural Land (41.5 ha)
2	12.2	20.3	29.4
3a	3.5	5.8	8.4
3b	25.8	42.9	62.2
Urban	8.5	14.1	
Non Agricultural	2.7	4.5	
Agricultural Buildings	5.5	9.1	
Not surveyed	2.0	3.3	
TOTAL	60.2		

38% of the agricultural land surveyed was found to be best and most versatile, mainly Grade 2 with minor limitations due to wetness or droughtiness and some Subgrade 3a moderate limitations due to wetness.

The remainder of the area was found to be Subgrade 3b, with more serious moderate limitations due to wetness.



# **Tewkesbury Borough Council, Gloucester City Council, Cheltenham Borough Council**

## **Joint Core Strategy**



Final Report

AMEC Environment & Infrastructure UK Limited

September 2011



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## Document Revisions

No.	Details	Date
1	First Draft	March 2011
2	Second Draft	July 2011
3	Final	Sept 2011

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**Report for**

Tewkesbury Borough Council  
Gloucester City Council  
Cheltenham Borough Council

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# **Tewkesbury Borough Council, Gloucester City Council, Cheltenham Borough Council**

## **Joint Core Strategy**

Final Report

AMEC Environment & Infrastructure  
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# Executive Summary

## Background

This Green Belt Assessment was commissioned by Cheltenham Borough Council on behalf of Cheltenham Borough Council, Tewkesbury Borough Council and Gloucester City Council. The three authorities are working together to produce a Joint Core Strategy, and this Strategic Green Belt Assessment forms part of the Joint Core Strategy evidence base.

The brief was to undertake a qualitative Green Belt assessment specifically focussing on an assessment against the five purposes of including land in the Green Belt as set out in Planning Policy Guidance 2: *Green Belts* (1995) and set out below:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns from merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

PPG2 sets out the national policy framework for the designation of and purposes of Green Belts and sets out the fundamental aim of Green Belt policy as being to prevent urban sprawl by keeping land permanently open. There is no change to this in the Draft National Planning Policy Framework (DCLG, July 2011). The Green Belt is not a landscape designation.

This Assessment makes recommendations as to how strategic segments of the Green Belt perform against each of the purposes of including land in the Green Belt. This does not mean that there are any areas of the Green Belt that make no contribution to the Green Belt purposes, but that some areas make less of a contribution than others. Once the scale of development that is required in the short and longer term in the Joint Core Strategy Area is known, and other elements of the evidence base such as those relating to landscape, sustainability issues, and good urban design are complete, then the authorities can consider whether or not Green Belt land is required. If Green Belt land is required, then the amount of land required will need to be established taking into account longer term development requirements post 2031 in case land also needs to be safeguarded. The Green Belt Assessment and other evidence base documents will then need to be considered before a decision is made on which sites are most suitable for release from the Green Belt in the short and long term. Detailed work would then be required to establish appropriate new robust Green Belt boundaries.



This Assessment is strategic and whilst it does highlight some areas where minor Green Belt boundary changes may be appropriate, the focus is on strategic segments as the level of development required is not yet known.

## Assessment Methodology

The assessment methodology has been developed in response to Green Belt reviews and local Green Belt studies that have been undertaken and based on PPG2 guidance. A summary of the approach to this study is set out below:

- Mapping exercise to identify key constraints.
- Identification of strategic Green Belt segments using OS maps, aerial photos and site visits, with strong boundaries being used to define boundaries of the segments.
- Assessment of each segment against each of the five purposes of including land in the Green Belt as set out in PPG2, paragraph 1.5 (four purposes were actually assessed as the fifth purpose could apply equally to all sites so was screened out). Broad assessment criteria were identified based closely on PPG2, rather than other elements that are not referenced in PPG2 and are covered by other parts of the evidence base.
- The results of the assessment were recorded using a matrix and a simple traffic light system. An overall traffic light score was then arrived at for each segment and mapped.
- The results of the above were summarised through segments being grouped into clusters and recommendations were made for each cluster of segments. Where recommendations are made that particular segments/clusters of segments require further consideration, this does not mean that they should be released from the Green Belt, but that they could be considered further depending on development requirements and the findings of other evidence base studies.
- Consideration was given to possible areas for inclusion in the Green Belt and seven such areas were assessed against the five purposes of including land in Green Belt using the same broad assessment criteria that were used for assessing the existing Green Belt.

## Summary of Assessment Results and Recommendations

### Assessment of Current Green Belt

Figure 5.2 in the main report summarises the results of the assessment against Green Belt purposes.

The assessment has identified seven clusters of segments that make a significant contribution towards Green Belt purposes and which should not be considered further for release from the Green Belt unless there is a very strong case emerging from other evidence base studies. These segments are:

- land between Bishop's Cleeve and Cheltenham;

- land between Cheltenham and Gloucester to the east of the M5;
- land between Gloucester and Churchdown to the west of the M5;
- land between Cheltenham and the M5 north of the A40;
- land to the west of the M5, north of the A40 and north and south-west of Churchdown;
- land to the north of Innsworth; and
- land to the west of the M5 and north of the B4063.

The recommendations in relation to these clusters of Green Belt segments that make a significant contribution to the Green Belt are summarised in Table ES1. These clusters do not merit further consideration for potential release from the Green Belt unless there is a strong case emerging from other evidence base studies.

**Table ES.1 Recommendations for Clusters that make a Significant Contribution towards Green Belt Purposes**

Cluster of Green Belt Segments	Recommendation
Land between Bishop's Cleeve and Cheltenham NE14, NE15, NE16, NE17, NE18, NE19, NE20, NE21, NE22	Maintenance of the separation between Cheltenham and Bishop's Cleeve is critical to fulfilling the purpose of Green Belt designation (as extended in 1981)
Land between Cheltenham and Gloucester to the east of the M5 SE2, SE3, SE4, SE5, SE6, SE10	This area is critical to the separation of Cheltenham and Gloucester, being the original purpose of Green Belt designation. Re-definition of the inner boundaries of segment SE3 could be required, perhaps along Field Lane, to provide a firmer long-term boundary.
Land between Gloucester and Churchdown to the west of the M5 SW1, SW2, SW3, SW4, SW5, NW4	This area is critical to the separation of Cheltenham and Gloucester, being the original purpose of designation.
Land between Cheltenham and the M5 north of the A40 NE1, NE2, NE3, NE4, NE5, NE6, NE7	This area is critical to preventing the sprawl of Cheltenham and towards the south, the merger of Cheltenham and Churchdown.
Land to the west of the M5, north of the A40, and north and south-west of Churchdown NW1, NW2, NW3	This is critical to preventing the closing of the gap between Cheltenham and Churchdown, being already heavily intruded towards its southern extent with Airport related uses.
Land to the north of Innsworth NW7, NW8	This is critical to preventing the closing of the gap between Cheltenham and Churchdown, particularly towards the east of these segments.
Land to the west of the M5 and north of the B4063 NW10, NW11	This forms the bulk of the extent of the Green Belt in this north-western quarter, with the separation function stronger towards the south and eastern area of the segments.

One cluster of segments was identified as making a contribution towards Green Belt purposes as follows:

- land north-west of Cheltenham.

The recommendation in relation to this cluster that makes a contribution towards Green Belt purposes is summarised in Table ES.2.

**Table ES.2 Recommendations for Cluster that makes a Contribution towards Green Belt Purposes**

Cluster of Green Belt Segments	Recommendation
Land north-west of Cheltenham NE9, NE10, NE11, NE12	Overall, these segments make a contribution to Green Belt purposes by virtue of providing the wider setting for Cheltenham and Bishop's Cleeve, but they are not critical to the Green Belt and play a more limited role in separation of the settlements. These segments play a role in preventing encroachment, as there are some strong boundary options, but they are divorced from the urban edge. They play a role in preventing ribbon development in some areas. If land was removed from the Green Belt in adjoining segments NE8 or NE13, then segments NE9, NE10, NE11 and NE12 would still make a contribution towards the Green Belt, although it may be a more limited contribution, particularly if any development in NE8 or NE13 creates a robust new Green Belt boundary.

Three clusters of segments were identified as making a limited contribution to Green Belt purposes, and which could be considered further for release by the JCS authorities should the land be required for development and should it be appropriate in light of the Core Strategy evidence base. These clusters of segments are as follows:

- land to the north, east and west of Brockworth;
- land to the west of Innsworth, north of Longford and around Twigworth; and
- land to the west of Kingsditch and Swindon.

The recommendations in relation to these clusters that make a contribution towards Green Belt purposes are summarised in Table ES.3.

**Table ES.3 Recommendations for Clusters that make a Limited Contribution towards Green Belt Purposes**

Cluster of Green Belt Segments	Recommendation
Land to the north, east and west of Brockworth SE1, SE7, SE8, SE9,	Intrusion of urban uses (particularly towards the east) compromises its sense of openness. Severance from the main Green Belt tract to the north by the A417 further compromises its function, meaning that there could be opportunities for re-examining its designation and boundaries as the A417 would be a strong long term boundary to prevent encroachment. Due to their enclosure on all sides by major roads, these segments serve little or no Green Belt function.
Land to the west of Innsworth, north of Longford and around Twigworth NW5, NW6, NW9	The openness of this tract is compromised by intrusive development throughout its extent. Combined with limited function in preventing the merger of towns, there is a case for re-examining its boundaries, particularly in relation to Innsworth, where existing boundary features could be readily used to create new long-term boundaries.
Land to the west of Kingsditch and Swindon NE8, NE13	<p>Whilst containing Cheltenham on its north-western boundary, extensive ribbon development along the north side of the A4019 severely limits the sense of openness of the southern portion (as viewed from this corridor) and compromises its overall function. Segments NE8 and NE13 are of a similar character, separated only by the reasonably strong boundary feature of Dog Bark Lane. Towards their western reaches, both segments increasingly share characteristics and functions of the outer segments of the Green Belt. These segments make a very limited contribution towards the separation of Cheltenham and Gloucester and Cheltenham and Bishop's Cleeve.</p> <p>As it is more difficult to identify clear Green Belt boundaries within these segments, any development within the segments or parts of the segments would require strong Green Belt boundaries to be created through good masterplanning.</p>

## Assessment of Potential Additions to Green Belt

The following broad areas were assessed as potential additions to the Green Belt:

- land to the south-west of Leckhampton (west/south-west of Farm Lane and east/south-east of Farm Lane;
- land to the east of Cheltenham;
- land to the north of Bishop's Cleeve;
- land to the west of the M5, north of the A4019, east of the A38;
- land to the west of Gloucester;
- land to the south-east of Gloucester, around Robins Wood Hill; and
- land south-east of Brockworth.

The case for extending the Green Belt is a limited one, with a small area of land immediately to the south of Cheltenham having the strongest case. Any Green Belt extension must be limited to those areas that make a



contribution to the five Green Belt purposes and the original purpose of designation, the separation of Cheltenham and Gloucester and Cheltenham and Bishop's Cleeve, as PPG2 does not make any reference to increasing the area of land in the Green Belt solely to compensate for areas of Green Belt released for development. Consideration should be given to the use of other policies that can be used to prevent development, such as areas of restraint policies, open countryside policies, and limiting opportunities through careful designation of settlement boundaries.

## Comparison of Results with Previous Green Belt Studies

A comparison of the broad findings of the SWRA Strategic Green Belt Review (the results of which are based on the JSA work), the AERC Cheltenham Green Belt Review and this AMEC Strategic Assessment was undertaken. Direct comparison of the specific results is not possible as the parcels of land considered are not the same in all assessments.

The SWRA Green Belt report concluded that there are two areas of the Green Belt where development would have the least harm, north of Gloucester and land north-west of Cheltenham. These are two of the three areas identified in this AMEC assessment as making a more limited contribution to the Green Belt purposes. The third location identified in this AMEC report as making a more limited contribution to the Green Belt purposes, north of Brockworth was assessed as third least harm by the SWRA report, but scored more highly in the JSA work.

Another key difference between results relates to the land between Cheltenham and Bishop's Cleeve. The AMEC assessment and AERC assessments are very similar for this area, treating it as key to the original purpose of designation (as extended in 1981). However, the JSA work did not score this as highly in terms of Green Belt purposes. Other differences in results between the AMEC and AERC assessments mostly relate to the very different parcel sizes that are considered, as the AERC report only relates to land in Cheltenham Borough making direct comparison difficult.

The key reasons for differences in the results are set out below.

- The AERC study includes a number of elements that are not referenced in PPG2 in relation to the purposes of the Green Belt. The AMEC study is purely based on the five purposes of including land in the Green Belt as set out in PPG2 and does not introduce other elements which are being considered through other evidence base studies.
- The AERC study considers smaller parcels of land immediately adjoining the urban area within Cheltenham Borough's boundary, whereas the AMEC work considers all of the Green Belt in the JCS area, and thus considers larger parcels in a more strategic approach. This is because until the likely required level of development on Green Belt sites is known, the number and size of sites cannot be established. The outer boundary of the AERC parcels is purely based on the Cheltenham Borough boundary which in some areas are just field boundaries, not boundaries that would be considered to be robust long term Green Belt boundaries. No plans of particular parcels were published with the JSA work.

- The AERC work involved consultations/workshops with stakeholders to seek their views on the Green Belt. Whilst this may have been appropriate to the remit of the AERC study, this approach would not be consistent with AMEC's independent strategic assessment as stakeholders such as community groups will all have their own particular interests and are often most interested in particular localities rather than having a more independent overview. Stakeholder engagement on matters relating to the Green Belt will be undertaken as part of the Joint Core Strategy consultation, ensuring an opportunity for everyone to comment/respond to the emerging policy.

## Conclusions

On the basis of the recommendations, this study has demonstrated that there are areas of Green Belt that merit further consideration for possible release from the Green Belt, should Green Belt land be required now and in the longer term and should it be appropriate in light of the findings of the other elements of the LDF evidence base, in particular those relating to development levels, sustainable patterns of development and landscape assessment. It should also consider the need for allocating safeguarded land to prevent the need for further Green Belt review at the end of the plan period. It has also identified those parts of the Green Belt that play a significant role in meeting the Green Belt purposes and which should remain in the Green Belt unless other elements of the evidence base strongly suggest otherwise.

This strategic assessment provides an objective and independent review of Green Belt boundaries to facilitate clear decision making and option testing once other evidence is available to the Joint Core Strategy Team. It should not be viewed in isolation, and needs to be viewed in the context of the entire Joint Core Strategy evidence base.



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# 1. Introduction

## 1.1 Background

- 1.1.1 Tewkesbury Borough Council (TBC), Gloucester City Council (GCC) and Cheltenham Borough Council (CBC) are working in partnership to prepare a Joint Core Strategy (JCS) as part of their respective Local Development Frameworks (LDFs). This partnership approach is being taken in order to co-ordinate the strategic development of the area to 2031. The JCS will form the strategy for the scale and location of development in the area, including housing, employment, social and community facilities.
- 1.1.2 In May 2010, the Coalition Government revoked Regional Spatial Strategies (RSSs) and set out a commitment to abolish them through the Localism Bill. Following a legal challenge, RSSs have been re-instated as the Government was found to have acted unlawfully in revoking them. However, it is intended that they will be revoked once the Localism Bill comes into effect, likely to be by April 2012.
- 1.1.3 Prior to the Government setting out its intention to revoke RSSs, the Draft Revised RSS for the South West identified a level of growth for the Gloucester and Cheltenham Housing Market Area (HMA) between 2006 and 2026. The Draft also identified five broad Areas of Search to meet the growth needs of Gloucester and Cheltenham, although they actually fell within Tewkesbury Borough. Four of these areas were in the Green Belt.
- 1.1.4 The JCS authorities are now reviewing their development requirements locally as part of the evidence base for the JCS, with this work being led by Gloucestershire County Council. The evidence base is made up of a number of other documents including the following:
- Comparative Site Assessment;
  - Employment Land Review;
  - Gloucestershire Strategic Housing Market Assessment (SHMA);
  - Gloucestershire Strategic Infrastructure Delivery Plan;
  - Green Infrastructure Study;
  - Landscape Assessment;
  - Renewable Energy Viability Assessment;
  - Strategic Flood Risk Assessment (1 and 2);
  - Strategic Housing Land Availability Assessment (SHLAA); and
  - Urban Extensions Definition Study.

- 1.1.5 This Green Belt Assessment of the Joint Core Strategy Area will also form part of the evidence base. It should be considered in the context of the entire evidence base, which the JCS authorities will use when considering which options for development to take forward for consultation. This report sets out recommendations regarding areas of the Green Belt, but it will not be until the level of development requirements are established that the JCS authorities will know the likely scale of development that may be required on Green Belt sites. It will be up to the JCS authorities to take any of these recommendations forward, or not, as appropriate based on all of the documents in the evidence base and, importantly, once the required level of development is known.
- 1.1.6 This Assessment does not consider sustainability issues or landscape issues, but is purely an assessment against the purposes and function of Green Belts as set out in Planning Policy Guidance 2: *Green Belts* (1995) which are to:
- check the unrestricted sprawl of large built-up areas;
  - prevent neighbouring towns from merging into one another;
  - assist in safeguarding the countryside from encroachment;
  - preserve the setting and special character of historic towns; and
  - assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 1.1.7 PPG2 sets out the national policy framework for the designation of and purposes of Green Belts and sets out the fundamental aim of Green Belt policy as being to prevent urban sprawl by keeping land permanently open. The Green Belt is not a landscape designation.
- 1.1.8 This is a strategic assessment and it is not within the remit of this study to consider detailed boundary options, minor detailed amendments to the Green Belt or to consider correcting minor anomalies in the current Green Belt, although where there are obvious anomalies these are noted. These issues will again need to be considered at subsequent LDF stages when the scale of development is known and good urban design and sustainability factors are considered.

## 1.2 The Study Brief

- 1.2.1 AMEC was commissioned by Cheltenham Borough Council on behalf of the Joint Core Strategy (JCS) Authorities to undertake a qualitative Green Belt assessment specifically focusing on an assessment against the five purposes of including land in Green Belts as set out in Planning Policy Guidance 2: *Green Belts* (1995). The study brief was set out by the JCS authorities with the following key objectives:
- Demonstrate an understanding of the relevant background documents/evidence bases, and show how they have been used to inform the study.
  - Prepare a focussed and transparent methodology for assessing PPG2 criteria, reflecting best practice and taking account of the Cheltenham Green Belt review (2007).

- Review the existing Green Belt of the JCS within the context of PPG2 consider the justification for Green Belt designation in 1960 and its extension in 1981 and whether the purposes of designation are still relevant and/or whether purposes have changed and why.
- Informed by analysis and critical assessment of the JCS Green Belt; identify broad areas where the Green Belt boundary may be re-designated (including both removal and/or addition to the Green Belt) against the purposes and criteria of PPG2 with a clear justification for each recommendation. Detailed boundaries are not expected, as these will be informed by detailed analysis of housing and population projections.
- Identify, in broad terms, a defensible Green Belt boundary to 2026 and beyond in the context of the five principles of PPG2 and maintaining “*the degree of permanence that Green Belts should have*” (PPG2, paragraph 2.8).
- Prepare a suite of strategic spatial planning policies that will embed the principles of PPG2 in the JCS; including green infrastructure mitigation in areas recommended for removal from the Green Belt designation.
- Provide an executive summary of the Green Belt Review.

1.2.2 The study provides an objective and independent review of Green Belt boundaries to facilitate clear decision making and option testing once other evidence is available to the JCS Team.

## 1.3 Structure of Report

1.3.1 The remainder of this report is structured as follows:

- Chapter 2 sets out the policy context including national, regional/strategic and local planning policies, and the background to the designation of the Gloucester/Cheltenham Green Belt. It also considers the previous Green Belt studies that have been undertaken.
- Chapter 3 sets out a review of current practice in Green Belt assessments.
- Chapter 4 sets out the assessment methodology.
- Chapter 5 sets out the assessment results and recommendations.
- Chapter 6 makes recommendations for consideration of strategic Green Belt policies.
- Chapter 7 provides a summary of the study’s findings and recommendations for the JCS Authorities to consider.





## 2. Policy Context

### 2.1 Introduction

- 2.1.1 This chapter sets out the policy context for the Green Belt assessment. It sets out the history and purposes of the Gloucester/Cheltenham Green Belt before considering the national, regional/strategic and local planning policy context. It goes on to consider the Local Green Belt studies that have been undertaken in the area in recent years.
- 2.1.2 Figure 2.1 shows the extent of the Green Belt in the context of the whole of the Joint Core Strategy Area.

### 2.2 The Gloucester/Cheltenham Green Belt and its Designation

- 2.2.1 The Gloucester/Cheltenham Green Belt was designated in 1968 through the County of Gloucestershire Development Plan, First Quinquennial Review. The primary purposes of the Green Belt in this location were to prevent Cheltenham and Gloucester from merging and to preserve the open character of the land between the towns.
- 2.2.2 The First Gloucestershire County Structure Plan in 1981 extended the Green Belt to include an area north of Cheltenham in order to protect the gap between Cheltenham and Bishop's Cleeve. The 1999 Structure Plan Second Review maintained the same area of Green Belt and set out the Council's continued support for the objectives of the prevention of coalescence of Cheltenham and Gloucester, and Cheltenham and Bishop's Cleeve and prevention of urban sprawl.
- 2.2.3 The current extent of the Gloucester/Cheltenham Green Belt is shown in Figure 2.1 in the context of the whole Joint Core Strategy Area and in more detail in Figure 2.2. All of the Green Belt beyond the Cheltenham boundary is within Tewkesbury Borough as Gloucester City's boundary is drawn tightly around the urban area. The majority of the Green Belt is therefore within Tewkesbury.
- 2.2.4 The Gloucester/Cheltenham Green Belt is the smallest in England and covers around 6,694ha. The breakdown of land use type in the Gloucester/Cheltenham Green Belt is set out in the Table 2.1.

**Table 2.1 Gloucester/Cheltenham Green Belt Land Use Type**

Theme	Hectares	%
Fluvial flood risk	496	7.4
Woodland	150	1.9
Land Quality Grades 1,2 & 3	5,858	87.5
Urban	75	1.1
Non-agricultural	120	1.8
BAP Priority Habitats	255	3.8
SSSI	48	0.7
AONB	970	14.5
Arable/Horticulture	2,149	32
Improved Grassland	2,573	38
Semi-natural grassland	944	14
Broadleaved/mixed woodland	480	7
Coniferous woodland	23	0.3
Built-up/gardens	484	7
Other	41	0.6

Source: Natural England (2010) Green Belts: a greener future

## Relevance of the Purposes of Designation

- 2.2.5 The main purpose of the designation of the Gloucester/Cheltenham Green Belt was to prevent Cheltenham and Gloucester, and later Cheltenham and Bishop's Cleeve from merging and to preserve the open character of the land between the town and city. The need to prevent the settlements from merging, particularly in light of increasing pressure for development in the area is still considered to be the key purpose of the Green Belt in this location today. If any land is to be released from the Green Belt, a key part of the assessment will be what its impact on the merging of the towns would be.
- 2.2.6 The Gloucester/Cheltenham Green Belt has been relatively successful in meeting the key purpose of ensuring separation between Cheltenham and Gloucester and Cheltenham and Bishop's Cleeve. Gaps between the settlements have been maintained, although in some places they are very narrow, with a range of urbanising uses, particularly in the vicinity of Gloucestershire Airport. In the majority of areas, the open character between the settlements is maintained.
- 2.2.7 When considering potential Green Belt releases, it will be necessary to ensure that those areas that remain are critical in preventing the towns from merging and that those considered for release contribute the least to this main Green Belt purpose.

- 2.2.8 There is no evidence to suggest that the key purposes of the original designation of the Gloucester/Cheltenham Green Belt should be changed or that they are no longer relevant. With increasing pressure for development on Green Belt sites, the purpose of separation is still a key consideration, particularly in those areas where the gap between the towns has already been eroded and is relatively narrow.

## 2.3 National Policy

- 2.3.1 Planning Policy Guidance Note 2 (PPG2): *Green Belts* (January 1995, amended March 2001) sets out the national policy framework for the designation of and purpose of Green Belts. PPG2 sets out the fundamental aim of Green Belt policy as being to prevent urban sprawl by keeping land permanently open. It states at paragraph 1.4 that the most important attribute of Green Belts is their openness.
- 2.3.2 The five purposes of including land in Green Belts are set out in paragraph 1.5 of PPG2 as follows:
- to check the unrestricted sprawl of large built-up areas;
  - to prevent neighbouring towns from merging into one another;
  - to assist in safeguarding the countryside from encroachment;
  - to preserve the setting and special character of historic towns; and
  - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.3.3 PPG2 sets out six objectives against which Green Belt land has a positive role to play, however PPG2 is clear at paragraph 1.7 that the extent to which the use of land fulfils these objectives is not in itself a material factor in the inclusion of land within a Green Belt, or in its continued protection.
- 2.3.4 PPG2 specifically identifies at paragraph 1.7 that “*the quality of the landscape is not relevant to the inclusion of land within a Green Belt or to its continued protection*”. This is not taken to mean that landscape should not be a consideration in the study, but that the quality of landscape is not a reason for designation as Green Belt as there are other policy designations that can be used to protect such areas. Consideration of landscape character is used in assisting with the identification of the openness of tracts of land, topography and key features which could be used to help define firm boundaries as a perimeter or subdivision.
- 2.3.5 Paragraph 2.9 of PPG2 relates to the width of the Green Belt, which should wherever practicable be several miles wide so as to ensure an appreciable open zone all round the built-up area concerned. This does not however mean that all sections of the Green Belt should be several miles wide and that land should be included in the Green Belt simply to ensure that it is several miles wide.
- 2.3.6 A key element of PPG2 relates to timescales for proposals affecting Green Belts, and that these timescales should be longer than those normally adopted for other aspects of the plan. The guidance at paragraph 2.12 is that local authorities should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period, in this case by 2031. Authorities are advised that this will in some cases mean identifying areas of safeguarded land which may be required to meet longer term development needs.



- 2.3.7 With regard to defining Green Belt boundaries, PPG2 states at paragraph 2.8 that it is necessary to establish boundaries that will endure, and that such boundaries should be carefully drawn so as not to include land which it is unnecessary to keep permanently open. More specifically the guidance advises that boundaries should be clearly defined, using readily recognisable features such as roads, streams, belts of trees or woodland edges where possible.
- 2.3.8 The Draft National Planning Policy Framework (DCLG, July 2011) retains the key elements of PPG2 as set out above. At paragraph 138 it makes clear that Green Belt boundaries should only be considered when a Local Plan is being prepared or reviewed and that boundaries should be capable of enduring beyond the plan period. At paragraph 140, the draft guidance states that when defining boundaries, local planning authorities should “...not include land which it is unnecessary to keep permanently open... where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period.”

## 2.4 Regional Policy

- 2.4.1 The Localism Bill, if enacted as proposed, will abolish Regional Spatial Strategies (RSSs). The South West RSS up to 2026 was at an advanced stage (the Secretary of State’s Proposed Changes known as the Draft Revised RSS were published for consultation in July 2008), but was not approved. It therefore does not form part of the development plan, but the Government has advised that even in the absence of regional strategies, the evidence base that informed their preparation may be a material consideration. It is still therefore useful to consider the regional context, and in particular to consider the background relating to Areas of Search in the Green Belt.

### Draft South West RSS

- 2.4.2 Section 3.3.4 of the Draft RSS refers back to Regional Planning Guidance for the region (RPG10) which identified the need to review the Green Belts in the region as proposals for development of the associated urban areas were taking shape. The context for the reviews was the need to consider sustainable patterns of growth. The RSS goes on to state that the Green Belt reviews and studies concluded that there are exceptional circumstances to justify revisions to the general extent of the Green Belt to meet development needs. Two Areas of Search, one to the north of Gloucester and one to the north of Cheltenham within the Green Belt were proposed in the Draft RSS (Policy SR12 and SR13). The Draft RSS also proposed extensions to the Green Belt to the north and north-west of Bishop’s Cleeve and to the south and south-west of Gloucester. The latter area is not within the JCS area.

### Draft South West RSS: EiP Panel Report

- 2.4.3 The Panel Report into the Draft South West RSS was published in January 2008. At paragraph 4.3.44 this clearly sets out that the Green Belt does not completely surround either settlement, and that this recognises its original purpose which was to maintain the separation between Gloucester and Cheltenham.
- 2.4.4 The Panel Report recommended a number of modifications to the Draft RSS, including increasing the Plan’s housing provision and additional provision at urban extensions. The Panel identified three additional Areas of Search, land south of Gloucester, east of Gloucester and north of Bishop’s Cleeve (not

in the Green Belt). Two other areas were identified to the south of Gloucester which are within Stroud District Council and are not relevant to this study of the JCS area.

- 2.4.5 The Panel made specific comments in relation to the Green Belt Areas of Search in the JCS Area. These are set out in Appendix A of this report.

## Secretary of State's Proposed Changes (the Draft Revised RSS)

- 2.4.6 The Draft Revised RSS included the Panel's recommendations relating to the proposed Areas of Search at east Gloucester, north Gloucester, south Cheltenham, north Cheltenham and north of Bishop's Cleeve (non Green Belt). Housing numbers were provided for each of these Areas of Search. The Draft Revised RSS states that the Green Belt will continue to maintain the separate identities of Cheltenham and Gloucester but in order to fulfil economic potential, provision is made to alter the general extent of the Green Belt to accommodate the proposed urban extensions.

- 2.4.7 With regard to the Green Belt, paragraph 4.1.28 of the Draft Revised RSS states that:

*“Green Belt will continue to maintain the separate identities of Cheltenham and Gloucester by keeping land open between them. However, necessary provision for new homes and to fulfil the SSCTs’ [Strategically Significant Cities and Towns] economic potential cannot be met within the existing urban areas. The most sustainable solution is to provide for urban extensions to the SSCTs, including five locations that have been subject to a review of the Green Belt. To address these exceptional circumstances, the RSS makes changes to the general extent of the Green Belt, removing the designation from the areas required to accommodate the proposed urban extensions”.*

- 2.4.8 The Revised Draft RSS goes on to state that the general extent of the Cheltenham and Gloucester Green Belt will be maintained subject to alterations at the Areas of Search.

## 2.5 Strategic Policy

- 2.5.1 As set out in section 2.4, the Localism Bill, if enacted as proposed, will abolish regional spatial strategies (RSSs). Therefore, in the absence of an adopted RSS, the Gloucestershire Structure Plan Second Review (Adopted 1999) sets the strategic policy context for Cheltenham, Gloucester and Tewkesbury up to 2011, and the policies of the Plan have been saved. Policy GB.1 of this Plan states that:

*“The Green Belt between Gloucester and Cheltenham and north of Cheltenham will be maintained. Within the Green Belt only appropriate*

*development which would not compromise the open character of the Green Belt or which would not contribute to the coalescence of settlements will be permitted.”*

- 2.5.2 The supporting text to Policy GB.1 recognises that a review of the extent of the Green Belt boundaries to investigate the possibility of releasing land as a means of accommodating future development needs which cannot be met elsewhere in sustainable locations is likely to be required during the review of subsequent Structure Plans. It states that any such land should be well related to Cheltenham or Gloucester, should not result in the coalescence of settlements and is likely to be in the form of a new settlement or urban extension. It also states that any review would need to consider the scope to add areas to the Green Belt.
- 2.5.3 In 2001, work began on the Third Alteration to the Gloucestershire Structure Plan with a Deposit Draft being published in 2003. This Plan retained the Green Belt policy from the Second Review Plan as set out above. However, the Third Alteration was never adopted as there was a Direction from the Secretary of State who considered that the Plan did not implement the Panel’s recommendations in relation to three policies in the draft plan. One of these related to the Green Belt policy, where the Panel had stated that “*a review of the Green Belt must be part of the implementation of this Third alteration, in order to give scope for a rational definition of boundaries for the PUAs [Principal Urban Areas] and to identify sites as part of the PUA to accept the requisite amount of growth in a sustainable way.*” This recommendation by the Panel took into account RPG 10 which required the boundaries of the Green Belt to be reviewed in the next round of Structure Plans. The Third Alteration Plan was never adopted as Gloucestershire County Council took the decision that the Secretary of State’s Direction should not be complied with.

## 2.6 Local Policy

- 2.6.1 The Local Policy context consists of the saved policies of the following plans:

- Gloucester Local Plan (Adopted 1983);
- Cheltenham Borough Local Plan Second Review (Adopted 2006); and
- Tewkesbury Borough Local Plan (Adopted 2006).

### Gloucester Local Plan (Adopted 1983)

- 2.6.2 Due to the local authority boundaries being so tightly drawn around the edge of the urban areas, none of the Green Belt land surrounding Gloucester falls within Gloucester City Council’s area.

### Cheltenham Borough Local Plan Second Review (Adopted 2006)

- 2.6.3 The Green Belt land that is within Cheltenham Borough is that which is immediately adjoining the urban area. The other significant designation is the Cotswold AONB which accounts for around 22 per cent of

the land in the Borough (the Green Belt accounts for around 17 per cent). All of the policies of the Cheltenham Borough Local Plans Second Review are saved beyond 2009.

- 2.6.4 The Cheltenham Borough Local Plan makes reference to national policy on Green Belts and its policies re-iterate the relevant sections of PPG2. Policy C06 relates to development in the Green Belt, Policy C07 relates to rebuilding or replacement dwellings in the Green Belt, Policy C08 deals with dwelling extensions in the Green Belt and Policy C09 relates specifically to development at Cheltenham Racecourse and states that:

*“Development at Cheltenham Racecourse, including extensions will only be permitted where it: (a) is principally horse racing related, and (b) does not extend beyond the confines of the built up area (the extent of the building up area is set out in the Plan)”.*

## Tewkesbury Borough Local Plan up to 2011 (Adopted 2006)

- 2.6.5 A number of the policies in this plan have been saved post 2009. The Plan states that the Green Belt has been successful in terms of retaining openness and restricting urban sprawl and inappropriate development.
- 2.6.6 The Plan recognises that due to the way in which the Green Belt constrains the areas peripheral to Cheltenham and Gloucester, this provides the justification for the exceptional circumstances through which land may be released from the Green Belt for development, as recommended by the Inspector at the Local Plan Inquiry. The exceptional circumstances identified in the plan can be summarised as follows:
- The need to allocate sufficient sites in the Principal Urban Areas (PUAs) to meet RPG10/Structure Plan requirements and lack of appropriate sites which meet locational criteria and dwelling residual requirement.
  - Aspects of certain Green Belt sites proposed for allocation contribute to the justification for their allocation.
  - The RPG requirement to critically review the Green Belt and to remove land from the Green Belt for development if, on balance, this would provide the most sustainable solution for accommodating future development requirements. The Plan considered this up to 2011.
- 2.6.7 The Plan states that it is unable to meet its housing requirements without the use of Green Belt.
- 2.6.8 Policy GRB1 is the only one of the Green Belt policies to be saved. This policy reflects the guidance in PPG2 as to what type of development is appropriate in the Green Belt. Policy GRB2 and GRB3 which have not been saved set out 11 sites which were to be removed from the Green Belt and ten sites that were to be added to the Green Belt. The latter was to remove some anomalies (resulting from the previous three separate plans that defined the Green Belt boundaries) and to create well defined long term boundaries.



## 2.7 Emerging Joint Core Strategy Area Policy

- 2.7.1 Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council are now working together to produce a Joint Core Strategy (JCS) as part of the Local Development Framework (LDF) process. There has already been consultation on key issues, and the next stage of public consultation will be on developing options in Autumn 2011. This Green Belt study will form part of the evidence base for the JCS and along with other key documents relating to matters such as the development requirements of the area, landscape assessment and sustainability appraisals, will inform decisions on whether or not it is necessary to release sites from the Green Belt, and if so, which sites would be more appropriate than others.

## 2.8 Local Green Belt Studies

- 2.8.1 The Gloucester/Cheltenham Green Belt has been the subject of several studies over recent years, as follows:
- Strategic Green Belt Review; South West Regional Assembly (SWRA) February 2006;
  - Cheltenham and Gloucester Joint Study Area Green Belt Review: Strategic Re-Assessment of the Green Belt;
  - Cheltenham Green Belt Review; AERC March 2007; and
  - Gloucester, Cheltenham & Tewkesbury Urban Extensions Boundary Definition Study, Entec 2010.
- 2.8.2 Appendix B of this report sets out further details of the content of these studies that have been reviewed.

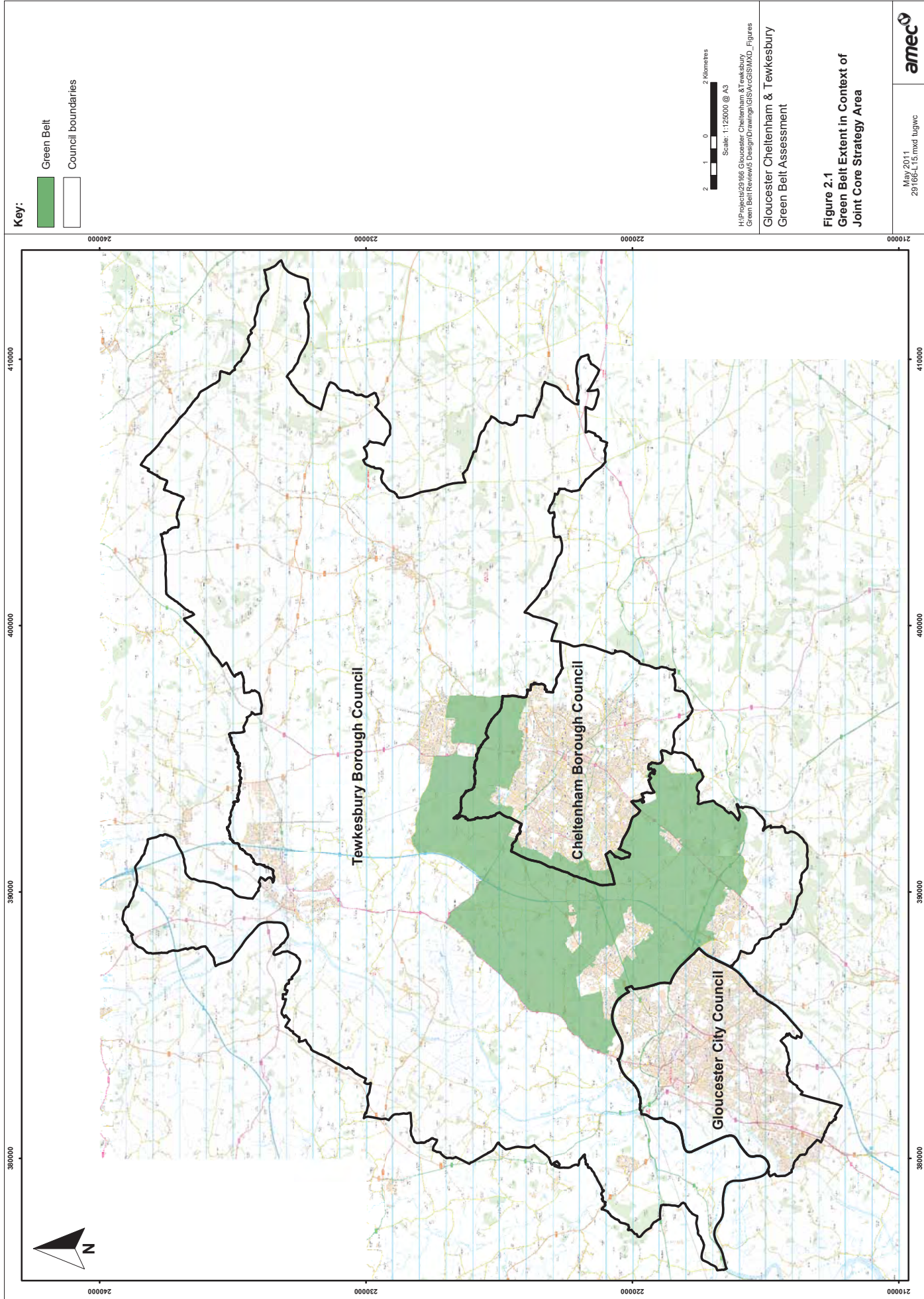
## 2.9 Summary

- 2.9.1 The Gloucester/Cheltenham Green Belt was designated to prevent the towns and city from merging and to preserve the open character of the land between them. The Green Belt was later extended to also protect the gap between Cheltenham and Bishop's Cleeve. There is no evidence to suggest that the original purpose of the Green Belt should be re-considered, and the maintenance of the gap between the towns is still considered to be the key purpose of the Green Belt in this location, and this is particularly the case in those areas where the gap between the towns is relatively narrow.
- 2.9.2 PPG2: *Green Belts* sets the national policy framework for Green Belts and clearly states that their most important attribute is their openness. PPG2 identifies the five purposes of the Green Belt as follows:
- to check the unrestricted sprawl of large built-up areas;
  - to prevent neighbouring towns from merging into one another;
  - to assist in safeguarding the countryside from encroachment;
  - to preserve the setting and special character of historic towns; and

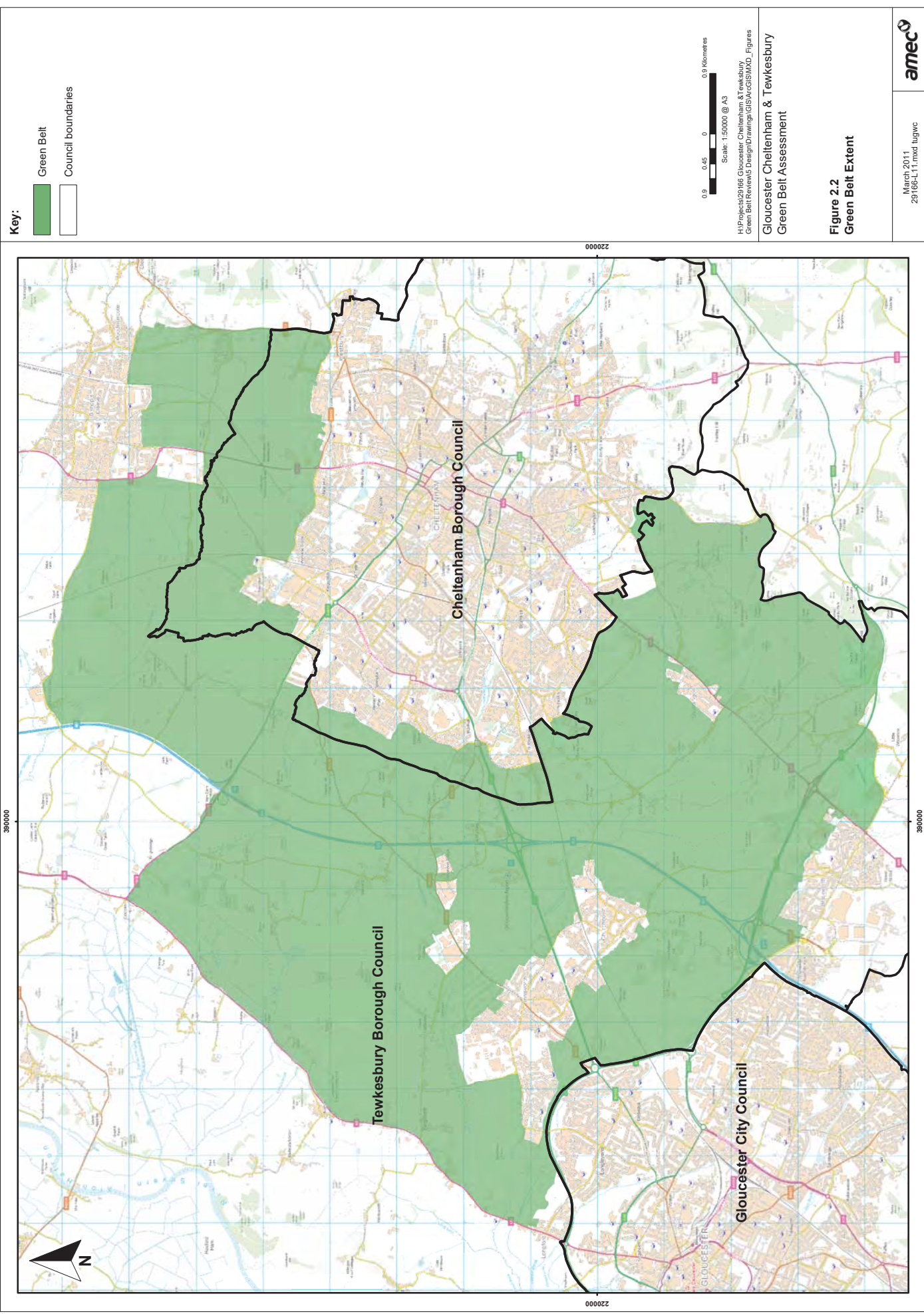
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 2.9.3 These purposes form the basis of this Green Belt assessment, the remit of which is to assess how different parts of the Green Belt perform against the above purposes and in doing so identify those areas that contribute the least and should be considered first for release in Green Belt terms. Of key importance to the assessment is the main purpose of designating the Green Belt in this location, the need to maintain separation between Gloucester and Cheltenham, and between Cheltenham and Bishop's Cleeve.
- 2.9.4 This section for the report has set out the regional, strategic and local policy context that applies to the Gloucester/Cheltenham Green Belt.









## 3. Review of Current Practice in Green Belt Studies

### 3.1 Introduction

- 3.1.1 The purpose of this section of the report is to provide an overview of the findings of our review of current practice regarding Green Belt reviews and to consider the implications for the JCS study methodology and approach. This section also considers examples of where additional land has been considered for inclusion in the Green Belt.

### 3.2 Other Green Belt Reviews

- 3.2.1 The JCS Urban Extensions Boundary Definition Study reviewed best practice in the development of a methodology for appraising Green Belt sites. This review included studies undertaken in Nottingham/Derby, Purbeck, Cheltenham and Coventry, a summary of which is set out in Appendix C. The findings of this review indicated that all had focused predominantly on assessing land against the five purposes of the Green Belt, utilising a scoring/grading system to indicate the relative Green Belt 'value' of land prior to identifying 'defensible' boundaries. However, there was no consistent approach used to assign grades/scores to the Green Belt areas. Some reviews adopted a commentary based approach (e.g. Purbeck and Nottingham - Derby) whilst others have drawn together Green Belt and sustainability criteria (e.g. Coventry) leading towards the use of weighted criteria (Cheltenham). Some have assessed very small areas of land, used relatively complex weighting criteria, and sometimes considered factors that are not identified in national guidance, when PPG2 does not specifically make any reference to the relative importance of the five purposes of including land in the Green Belt. The studies identified were generally undertaken at a broader, more strategic spatial scale focussing on identifying areas where boundary review may be appropriate or preferred.
- 3.2.2 Since publication of the JCS Urban Extensions Boundary Definition Study (July 2010), there appear to have been no new studies, apart from the updating of existing work, notably the Purbeck Green Belt Review (October 2010). This extends the study (using the methodology reviewed previously) to appraise a number of settlement extensions identified following public consultation. A traffic light approach is used, with potential boundary changes shown on maps and recommendations made for which sites or parts of sites should be released.
- 3.2.3 The Knowsley and Sefton Green Belt Study is currently being undertaken. Its methodology consists of four stages:
- Stage 1 Identification of broad sections and parcels, in turn subdivided into smaller parcels for more detailed assessment. Parcels are identified according to:
    - similar character and land use;
    - similar impact on the openness of the Green Belt; and
    - clearly defined by durable, significant and strong physical boundaries where possible, both existing and proposed.

- Stage 2 Testing against the five purposes of including land in the Green Belt as set out in PPG2 using a mixture of quantitative and qualitative evaluation, including scoring of fulfilment of Green Belt purpose (A - contributes significantly; B - limited contribution; and C - no contribution). In appraising the purpose of Green Belts, the following criteria are used:

Purpose	Criteria
To check the unrestricted sprawl of large built-up areas	The extent to which existing development affects the openness of a parcel
To prevent neighbouring towns from merging into one another	The width of the strategic open gap between urban areas
To assist in safeguarding the countryside from encroachment	Does the use of the parcel meet one of the objectives for including land in the Green Belt (PPG2 paragraph 1.6) or is it in a defined countryside use (PPS7 paragraph 16)
To preserve the setting and special character of historic towns	Whether a parcel helps preserve the setting and special character of an historic town, village or park
To assist urban regeneration by encouraging the recycling of derelict and other urban land	Whether development in the parcel would be likely to divert development away from identified regeneration areas

- Stage 3 Assessment of those parcels not judged to be critical against identified constraints and positive attributes using a scoring system weighted to connectivity to the urban area, with a map showing parcels with potential.
- Stage 4 Assessment of capacity and establishing triggers for future release, through allotting each parcel to a particular settlement with a further qualitative assessment of each of the parcels or groups of parcels, particularly against issues which could affect their deliverability and viability.

- 3.2.4 It could be questioned whether the above approach is entirely consistent with PPG2. For instance the criteria identified for the third purpose in the table above refers to whether or not the land meets the objectives for including land in the Green Belt (paragraph 1.6 of PPG2). PPG2 makes clear at paragraph 1.7 that “*the extent to which the use of land fulfils these objectives is however not itself a material factor in the inclusion of land within a Green Belt*”. The first criteria relates to the openness of a parcel, but development by its nature removes openness, and it is not clear how this relates to sprawl.
- 3.2.5 A recent supplement to the Coventry Green Belt Review of 2009 explored the qualities of specific areas previously identified as having potential for release. A detailed appraisal against a suite of factors including ecology, land quality, landscape character and sustainability was undertaken. Again this study would appear to go beyond Green Belt assessment against the five purposes using factors that are not relevant to designation.
- 3.2.6 A Green Belt Review undertaken by Calderdale MBC (November 2008) as part of their Core Strategy evidence base sought to appraise the validity of the current Green Belt and adjacent areas and whether the boundaries were adequate and defensible. The methodology used a three-stage process as follows:
- Stage 1 Initial Sieving - used 500m squares to remove areas of nature conservation value and which had a high sustainability score (derived from a settlement hierarchy model), yielding broad areas for investigation.



- Stage 2 Site Identification - involved identifying sites (using aerial photographs) within the broad areas of search according to:
  - similar character and land use for Green Belt purposes;
  - not crossing significant boundaries such as motorways, rivers or protected woodlands;
  - taking account of changing landscape and landform; and
  - being smaller in area where they are located close to existing boundaries.
- Stage 3 Site Testing - employed an impact scoring of 1 to 5 and weighting against Green Belt purposes and various derived assessment criteria, as follows:

Purpose	Criteria
To check the unrestricted sprawl of large built-up areas	Impeded ribbon development
To prevent neighbouring towns from merging into one another	Distance from built up area
To assist in safeguarding the countryside from encroachment	Nature and geological conservation value Accessibility of communities to the countryside Trees/woodland Agriculture
To preserve the setting and special character of historic towns	Preserve the character and setting of the historic core of towns In a Conservation Area/Historic Park or Garden
To assist urban regeneration by encouraging the recycling of derelict and other urban land	Excluded as Green Belt land is considered to contribute equally to fulfilling this purpose by encouraging development in the urban area to an equal extent.

- 3.2.7 Again the above approach is not considered to be entirely consistent with PPG2. The second criteria above, distance from built up area is not considered to be relevant as larger gaps can still be key to preventing the merging of towns in some locations. The third criteria set out above are not considered to be relevant to encroachment and there is no reference to these criteria in PPG2. It would appear that a number of studies have struggled to define sprawl and encroachment and hence considered factors not strictly consistent with PPG2.

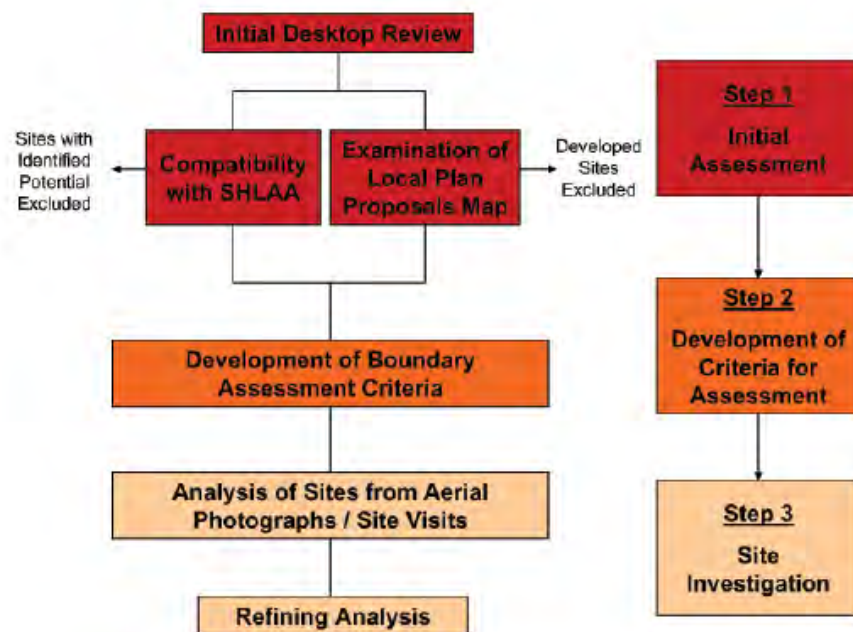
### 3.3 Current Practice of Additions to the Green Belt

- 3.3.1 There are very few examples of Green Belt studies that have resulted in strategic/significant additions to the Green Belt either as compensation for land that is removed from the Green Belt or simply as additions.
- 3.3.2 As part of a wider review of development capacity, the Borough of Windsor and Maidenhead undertook a review in March 2009 of detailed Green Belt boundaries around excluded settlements in order to clarify their precise extent and recommend additions to the Green Belt. Previously, boundaries were drawn



loosely, to include open spaces, which resulted in a lack of definition between the areas in the Green Belt and areas in the settlement. In order to correct this and the general lack of consistency in boundary definition and to more closely accord with PPG2 that boundaries should follow clear features on the ground, the following method was followed.

**Figure 3.1 Methodology for Green Belt Review used in Windsor and Maidenhead**



3.3.3 The methodology for boundary definition consists of two steps. Step 1 specifies that boundaries should always try to follow a permanent physical feature on the ground that creates a logical, strong and defensible boundary. The order of preference of these features is:

- a road edge; typically the road should be included within the settlement unless a more logical line would include the road in the Green Belt;
- a building line that provides a straight logical line and clearly represents the edge of the urban area;
- a pathway, stream, ridge, car park, playground or other physical feature;
- an ownership boundary marked by physical features such as a hedgerow or a fence-line; or
- in the absence of any physical features to follow on the ground to provide a straight line between two permanent physical features.

- 3.3.4 Where a lower preference is chosen for the boundary, there must be a logical reasoning for this; for example higher preferences fail to protect open spaces, or create irregularities in the overall boundary of an Excluded Settlement.
- 3.3.5 Step 2 notes that where there is an open space at the edge of a settlement, it will generally be incorporated into the Green Belt, but only where a new logical boundary can be drawn using the features in Step 1. If the space is dominated by a building or would replace a strong, logical boundary with a weak, illogical one, this change will not be appropriate.
- 3.3.6 It is noted that the approach only seeks to amend minor irregularities to the boundary and will not alter large areas. The result of the exercise was the identification of an additional 55ha at 25 sites recommended for inclusion in the Green Belt. These additions have not yet been taken forward through Examination or included in an adopted Core Strategy.

### 3.4 Implications for JCS Study

- 3.4.1 Given the strategic nature of the current study, and as noted in the Urban Extensions Boundary Definition Study, the locality-specific assessment using overly complex weighting criteria, factors that are not identified in national guidance, and of sometimes very small areas, is not always helpful. These approaches also add weighting when no such priority exists in PPG2. Keeping the methodology straightforward allows a maximum degree of clarity, aiding subsequent interpretation of more detailed Green Belt boundaries and judgements regarding the release of land.
- 3.4.2 A number of studies have struggled with defining certain purposes, particularly those relating to encroachment and sprawl. The SW RSS Panel Report noted in relation to this that in practice, unrestricted sprawl and countryside encroachment are limited by the combined presence of the flood plan and the Cotswolds AONB.
- 3.4.3 A number of studies have gone further than pure Green Belt assessment by considering sustainability, landscape and ecological issues. Whilst this is useful when considering which individual sites may be more suitable for release from the Green Belt, this is not considered to form part of an assessment of the five purposes of including land in the Green Belt. It may also confuse judgements about the relative importance of Green Belt purposes. Green Belt is not a landscape quality or policy designation, and the main aim of Green Belt policy is to prevent urban sprawl and keep land permanently open. That is not to say that landscape is not a consideration, but it should not be a key consideration in terms of assessment against the five Green Belt purposes. It suggests that these 'additional' factors should be considered as a discrete exercise that can be combined later with the Green Belt review to determine the most appropriate locations for development with a balanced judgement of protecting Green Belt purposes and achieving the most sustainable patterns of development.
- 3.4.4 Studies re-examining Green Belt boundaries in detail (such as that of Windsor and Maidenhead noted previously) are helpful in providing a comparator for checking the robustness of Green Belt boundaries, which is useful in identifying areas for potential release but also extensions. From our research it is clear that major additions to the Green Belt are not common, perhaps because in most cases land that met the five purposes of including land in the Green Belt was included in the original designation. However, if there are areas that were not originally included, but that do meet the five Green Belt purposes then they should be considered for inclusion. The assessment method for considering additions to the Green Belt should be the same as for considering possible land to be removed from the Green Belt. PPG2 does not

make any reference to 'compensatory' additions to the Green Belt. With regard to proposals for new Green Belts, PPG2 states at paragraph 2.14 that local authorities should demonstrate why normal planning and development control policies would not be adequate, and whether any major changes in circumstances have made the adoption of this exceptional measure necessary. This need to demonstrate why other planning policies are not sufficient could equally apply to major additions to an existing Green Belt.

## 4. Assessment Methodology

### 4.1 The Study Area

- 4.1.1 A key objective of the study brief is to review the existing Green Belt of the JCS area in the context of PPG2 and the five purposes of including land in the Green Belt. The extent of the Green Belt within the JCS area is shown in Figure 2.1. This study only covers Green Belt that falls within the administrative areas of Tewkesbury Borough, Cheltenham Borough and Gloucester City. The study considers all parts of the Green Belt, including the inner and outer boundaries and also settlements that are within the Green Belt. However, due to the nature of the Green Belt in this area, there are certain areas which do not need to be considered in great detail as their role in meeting the purposes of the Green Belt and the key purpose of designation, separation, is very clear. The study is strategic in nature which is appropriate at this stage of the Core Strategy development. The most appropriate detailed Green Belt boundaries cannot and should not be identified until the level of development, likely densities, sustainable development considerations and land take is known and until other elements of the evidence base have been completed.

### 4.2 Methodology

- 4.2.1 The initial stages of this study were to review relevant policies at the national, regional, strategic and local levels and to consider the original purposes of designation of the Gloucester/Cheltenham Green Belt. This was followed by a review of the local Green Belt studies that have been undertaken in the area in recent years and a review of current practice elsewhere, updating the work that was undertaken as part of the Urban Extensions Boundary Definition Study. This informed the methodology for this study.
- 4.2.2 The approach set out below was taken to identifying and assessing how far Green Belt purposes are fulfilled across the JCS area and the relative contribution that each area makes.

### Mapping of Key Constraints and Strategic Green Belt Segments

- 4.2.3 This involved a mapping exercise to identify key constraints, such as AONB, areas at risk of flooding and nature conservation designations. This data was provided by the JCS authorities in the form of GIS data. This mapping of key constraints has primarily been undertaken to set out the context for other considerations in addition to the Green Belt. Some of the constraints may prevent certain types of development in particular areas, such as an area at risk of flooding. Other constraints may not preclude development but will impact on design and therefore potentially affects the developable area of the site which will have implications when the likely Green Belt land requirements are known.
- 4.2.4 Following the mapping of constraints, strategic Green Belt segments were defined by using OS maps, aerial photographs and site visits to identify significant boundaries for segments of broadly similar character. The strongest strategic boundaries such as roads, railways, watercourses and hedge/tree-lines were used to assist in identifying the segments. Forty eight separate Green Belt segments were identified. For ease of analysis these were split into four quadrants, defined by the intersection of the M5 with the A40 and labelled SE, SW, NW and NE (see Figure 4.1). The appraisal of strategic segments allows for the subsequent identification of single, or groups of, segments which can be further analysed.



## Assessment of Segments against Green Belt Purposes

4.2.5 This involved an assessment of the role of each segment in fulfilling the five purposes of including land in Green Belts (section 1.5 of PPG2) as set out below:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns from merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

4.2.6 The fundamental aim of Green Belt policy is to keep land permanently open (PPG2, paragraph 1.4). This therefore is a key consideration in the overall assessment of each site, as openness is so critical to the Green Belt. The Draft National Planning Policy Framework (DCLG, July 2011) retains the five purposes and fundamental aim as set out in PPG2.

4.2.7 PPG2 does not define the five purposes further or set out how they should be assessed, although it clearly does not give any particular weighting to the different purposes. Table 4.1 sets out the broad criteria that have been used in this assessment of how each segment meets the five Green Belt purposes.

**Table 4.1 Broad Assessment Criteria**

Green Belt Purpose (as set out in PPG2)	Broad Criteria used in Assessment
To check the unrestricted sprawl of large built-up areas	What role does the segment play in preventing ribbon development and non compact development?
To prevent neighbouring towns from merging into one another	What role does the segment play in preventing Gloucester and Cheltenham and Cheltenham and Bishop's Cleeve from merging and narrowing the gap between them? Would a reduction in the gap between the towns compromise the openness of the Green Belt land? What is the width of the gap?
To assist in safeguarding the countryside from encroachment	Are there clear strong and robust boundaries to contain development and prevent encroachment in the long term? Are there already significant urbanising influences? Has there already been encroachment by built development?
To preserve the setting and special character of historic towns	Are there views and links to the historic centres and does the land have an impact on the special character of the town?
To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	This has been 'screened out' as this could be applied equally to all land in the Green Belt.

- 4.2.8 Previous studies have often struggled with the definition of sprawl and encroachment, and the differences between these. The dictionary definitions of sprawl and encroachment, as set out below are helpful in this respect:

Sprawl is defined as “...*the straggling expansion of an urban or industrial area, irregular or straggling form, spread out over a large area in an untidy or irregular way*”.

Encroachment is defined as “*intrude, advance gradually beyond an acceptable or established limit*”.

- 4.2.9 It is therefore considered reasonable in assessing existing Green Belt boundaries to use the criteria set out in Table 4.1 as being supported by these definitions. When revising Green Belt boundaries, PPG2 sets out that boundaries should be clearly defined using readily recognisable features where possible. These would then prevent sprawl and encroachment.

- 4.2.10 Consideration was also given to the following factors:

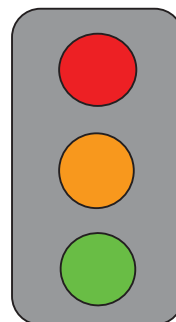
- existing land use;
- proximity and relationship to the built-up area;
- degree of enclosure/openness;
- distance and visual connection to historic urban centres/key urban areas; and
- relationship to the countryside.

- 4.2.11 The results of the assessment were recorded in a matrix and using a simple traffic light system as shown below.

Area makes a significant contribution to Green Belt purposes:

Area makes a contribution to Green Belt purposes:

Area makes a limited contribution to Green Belt purposes:



- 4.2.12 This individual assessment against each purpose was followed by an evaluation of the overall extent to which each segment fulfils Green Belt purposes, again through the traffic light system and accompanying written evaluation using professional judgment. As a consequence, in some cases there may be one overriding purpose which is deemed critical, or in others a combination of a range of purposes that may lead to the overall conclusion.

- 4.2.13 We have not weighted the purposes as some other studies have done, as a weighting approach is much more open to interpretation as to the source and scale of the weighting used. Weighting of Green Belt purposes arguably goes against the spirit of PPG2 which, whilst identifying the prevention of sprawl and

the need to keep land permanently open as the fundamental aim of Green Belt policy, does not actually prioritise the five purposes of Green Belts. However, in the case of the Gloucester/Cheltenham Green Belt, the primary purpose of designation in this location was to prevent Cheltenham and Gloucester merging and to preserve the open character of the land between the towns. The professional judgement element of our methodology allows for consideration of this primary purpose, and in many cases, through professional judgement, particularly where the segment is in a very narrow part of the gap between settlements, this is considered to be an overriding factor in the overall traffic light judgement.

- 4.2.14 None of the traffic lights mean that there is no contribution to Green Belt purposes, and those segments identified as green still usually make some contribution to Green Belt purposes. A green light does not indicate that a particular segment should be released from the Green Belt, but that it merits further consideration should development requirements and other evidence suggest that Green Belt releases are necessary, as an area that is of least importance in Green Belt terms.
- 4.2.15 Recommendations for Green Belt release are not made in this report, rather it identifies segments where the purposes of the Green Belt are weaker and boundaries for the long term might merit re-definition should the land be required now or in the longer term. Potential release of segments or parts of segments from the Green Belt would have to be considered in the context of a range of planning, landscape and sustainability issues, having been informed by the level of development that is required in the JCS area, not purely based on this assessment.
- 4.2.16 The detailed consideration of potentially revised boundaries is not undertaken as this is a task for a more detailed review, as undertaken for the Urban Extensions Boundary Definition Study. The likely scale of Green Belt releases and land take is needed before detailed boundaries can be considered. All of the segments have however been identified based on strong boundaries such as roads, railways, watercourses and hedge/tree-lines and therefore could be used as the starting point for considering boundaries once the level of development required is known.
- 4.2.17 It should be noted that this Green Belt assessment differs from the previous Urban Extensions Boundary Definition Study in that the previous study was working backwards from areas of search and from specific growth numbers to find parcels of land that fitted these parameters. It was prepared in the context of a regional strategy that had already set a policy direction for removal of land from the Green Belt and had identified areas of search. This Green Belt assessment is undertaken without this policy direction and therefore considers all areas of the Green Belt and has divided the Green Belt up into appropriate segments for assessment rather than focusing on development levels and how much development particular segments could accommodate. As a consequence some of the results may vary slightly.
- 4.2.18 Once the JCS authorities have completed the evidence base and know what level of development needs to be planned for on Green Belt sites then the impact of potential Green Belt releases would need to be considered further in terms of the implications for the integrity of the wider Green Belt, the impact on patterns of sustainable development and other environmental considerations.

## Mapping of Assessment Results

- 4.2.19 The traffic light results of the final assessment/evaluation were mapped and a summary table produced.

## Identification of Additions to the Green Belt

- 4.2.20 As required in the study brief, broad areas in the JCS area that are not currently located in the Green Belt were identified in order to consider which of these might usefully be added to the Green Belt to reinforce the existing Green Belt segments. All except one of these areas are physically linked to the existing area of Green Belt. These areas were also assessed against the five purposes of including land in Green Belts, as they will need to make a contribution to Green Belt purposes if they are to be considered for inclusion. Importantly they will need to meet the main purpose of designation of the Gloucester/Cheltenham Green Belt, to maintain the separation between Cheltenham and Gloucester, and Cheltenham and Bishop's Cleeve, as this is still the key purpose of the Green Belt in this location. PPG2 does not set out any specific guidance on additions to existing Green Belts and does not make any reference to adding 'compensatory' Green Belt. There is therefore little policy guidance to suggest that new areas of Green Belt should be considered. With regard to new Green Belts, PPG2 advises that local authorities will need to demonstrate why normal planning and development control policies would not be adequate. This is retained in the Draft National Planning Policy Framework (DCLG, July 2011).





Key:



Strategic segments

0.6 0.3 0 0.6 Kilometres

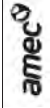


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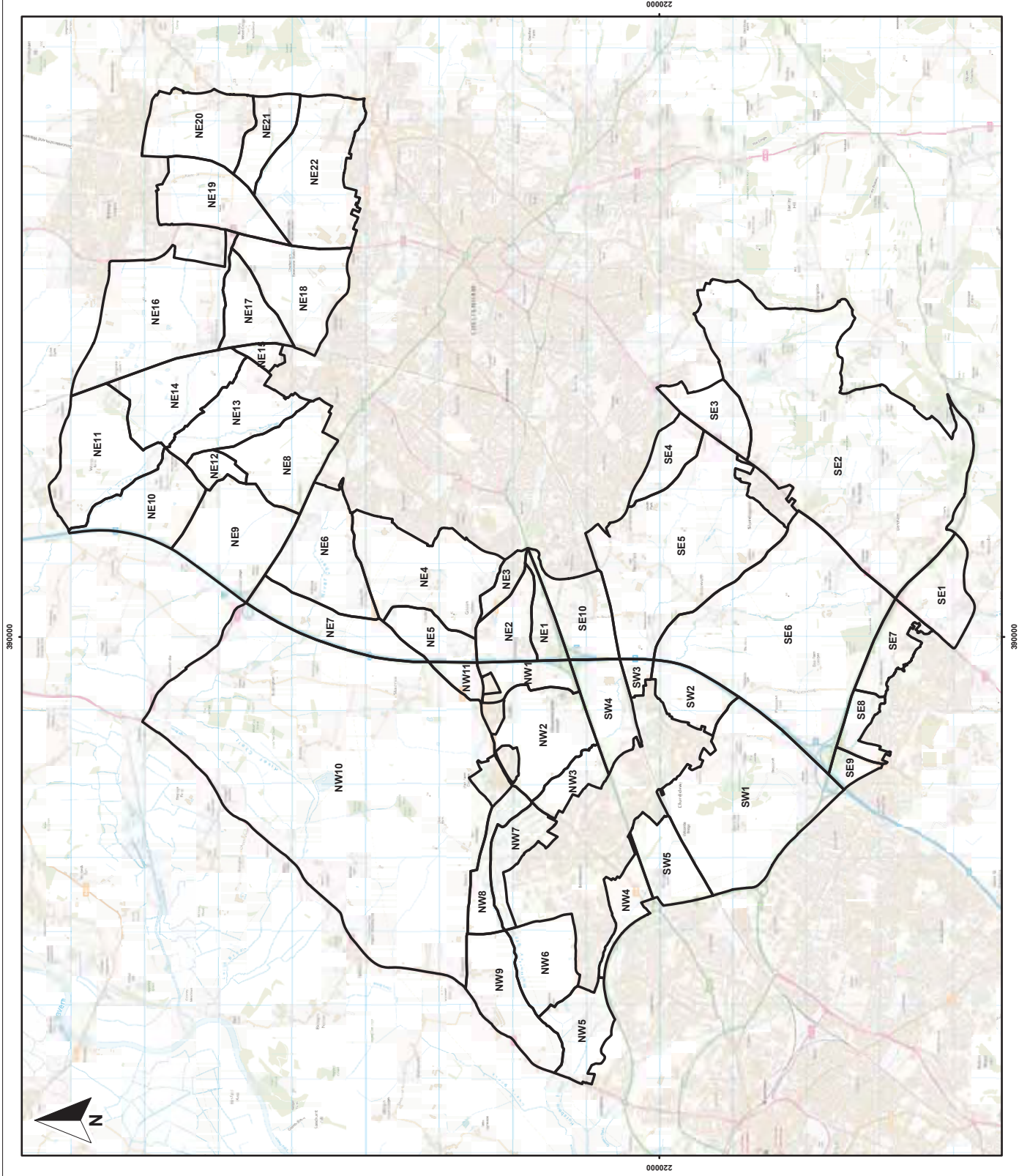
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Gloucester Cheltenham & Tewkesbury  
Green Belt Assessment

Figure 4.1  
Strategic segments



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## 5. Assessment Results

### 5.1 Introduction

5.1.1 This section of the report sets out the results of the assessment.

### 5.2 Green Belt Assessment Results

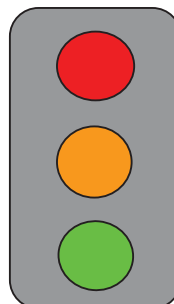
5.2.1 As set out in chapter 5, strategic segments were identified using mapping, aerial photographs and site visits to identify significant boundaries for segments of broadly similar character. Strong boundaries such as roads, railways, watercourses and hedge/tree-lines have been used where possible. The segments identified through this methodology are shown in Figure 4.1. Figure 5.1 shows the extent of the Green Belt in the JCS Area along with key constraints, including areas at risk of flooding, the Cotswold Area of Outstanding Natural Beauty (AONB) and nature conservation sites. This shows the wider context within which the assessment is being undertaken.

5.2.2 The main part of the appraisal considers the relative extent to which the different segments fulfil the purposes of Green Belts as set out in PPG2 (paragraph 1.5), although as set out in the methodology, the purpose relating to urban regeneration has been screened out for all segments as it could apply equally to all sites. The results are assessed through written evaluation and a traffic light system as set out below.

Area makes a significant contribution to Green Belt purposes:

Area makes a contribution to Green Belt purposes:

Area makes a limited contribution to Green Belt purposes:



5.2.3 Following identification of the traffic light for how each strategic segment fulfils each of the Green Belt purposes (excluding the urban regeneration purpose which has been screened out), an overall evaluation of the segment is provided along with an overall traffic light for the particular segment. Therefore segments can have a different traffic light in relation to each Green Belt purpose, but the overall traffic light for the segment relates to the overall contribution of that segment against the five purposes. The matrix that set out the detailed results of this assessment can be found in Appendix D of this report. Figure 5.2 maps these results so that the geographical distribution of the results can more easily be seen.

## Overview of Key Results

5.2.4 In order to help organise the analysis of the contribution of the strategic segments, these have been grouped into 11 clusters. Seven of these clusters comprise the bulk of the Green Belt and are judged to make a Significant Contribution to Green Belt purposes, whilst one of the clusters make a Contribution and three make a Limited Contribution. These are shown in Table 5.1.

**Table 5.1 Segment Clusters and their Contribution to the Green Belt Purposes**

	Significant Contribution	Contribution	Limited Contribution
Segment clusters	<ul style="list-style-type: none"> <li>Land between Bishop's Cleeve and Cheltenham (segments NE14, NE15, NE16, NE17, NE18, NE19, NE20, NE21, NE22)</li> <li>Land between Cheltenham &amp; Gloucester to the east of the M5 north of the A40 (segments NE1, NE2, NE3, NE4, NE5, NE6, NE7)</li> <li>Land between Cheltenham and Gloucester to the east of the M5 south of the A40 (segments SE2, SE3, SE4, SE5, SE6, SE10)</li> <li>Land between Gloucester and around Churchdown to the west of the M5 south of the A40 (segments SW1, SW2, SW3, SW4, SW5, NW4)</li> <li>Land to the west of the M5, north of the A40, and north and north-east of Churchdown (segments NW1, NW2, NW3)</li> <li>Land to the north of Innsworth (segments NW7, NW8)</li> <li>Land to the west of the M5 and north of the B4063 (segments NW10, NW11)</li> </ul>	<ul style="list-style-type: none"> <li>Land to the north-west of Cheltenham (segments NE9, NE10, NE11, NE12)</li> </ul>	<ul style="list-style-type: none"> <li>Land to the north, west and east of Brockworth (segments SE7, SE8, SE9, SE1)</li> <li>Land to the west of Innsworth, north of Longford and around Twigworth (segments NW5, NW6, NW9)</li> <li>Land to the west of Kingsditch and Swindon (segments NE8, NE13)</li> </ul>

5.2.5 The contribution that the segment clusters make to the Green Belt purposes is set out below.

## Land Making a Significant Contribution to Green Belt Purposes

5.2.6 This land comprises the bulk of the Gloucester/Cheltenham Green Belt, and for the most part very clearly contributes to Green Belt purposes in relation to the Green Belt criteria. The strategic segments which make up this land have well defined external boundaries (principally being roads and watercourses) and as such have a clear identity and role in preventing encroachment into the countryside. The contribution of these segments to the prevention of the merging of Cheltenham and Gloucester, and Cheltenham and Bishop's Cleeve, the main purpose of designation of this Green Belt is very clear, as is their role in prevention of sprawl. There are however some parts of this area where there is some significant development associated with historic uses, notably at and around Gloucestershire Airport, Cheltenham



Racecourse and a series of areas that are excluded from the Green Belt between Churchdown and Cheltenham which, along with the M5, compromises a sense of openness and creates a more urbanised feel in this narrow corridor. This emphasises the need to maintain the gap in this area, particularly around the airport and racecourse where the gap between settlements is already very narrow. A sense of open countryside is soon achieved to the north and south of the narrow gap around Gloucestershire Airport, and overall, from viewpoints such as Leckhampton Hill and Churchdown Hill, the land readily gives the impression of open countryside.

- 5.2.7 Segment SE3, lying immediately to the south-west of Leckhampton has well-defined external boundaries in the A46 to the west and Leckhampton Lane to the south, and a strong landscape structure comprising pasture and remnant orchards separated by well-maintained hedgerows which gives it a strong coherence. However, despite the bulk of the segment fulfilling Green Belt purposes, particularly in limiting ribbon development along the A46 between Warden Hill and Shurdington, the boundary of the segment with land at Leckhampton appears to be illogical, particularly given recent developments at Brizen Lane/The Lanes which intrude into the parcel. The segment would most logically be defined by Farm Lane. However, the current eastern boundary of the Green Belt follows a ditch and hedgerow feature and then skirts the immediate boundary of the Brizen Lane/The Lanes development. A strong eastern boundary, such as Farm Lane, would help to complete the definition of the segment, albeit with detailed consideration of the precise boundary line in the vicinity of Brizen Farm. In turn, the contribution of the segment to Green Belt purposes would be strengthened and should be maintained given the importance of the gap between Cheltenham and Shurdington.
- 5.2.8 Overall, the weakest contribution of this land is to providing the setting to historic towns. Whilst the historic cores of both Cheltenham and Gloucester are largely masked by peripheral development, there are nevertheless long distance views to Gloucester Cathedral from significant parts of this land in its southern reaches, and particularly from Leckhampton Hill.

## Land Making a Contribution to Green Belt Purposes

### Land north-west of Cheltenham (Segments NE9, NE10, NE11, NE12)

- 5.2.9 This land, forming the outer extent of the Green Belt is bounded to the west by the M5 motorway, the A4019 Tewkesbury Road to the south, the Bristol-Birmingham mainline railway to the east, and Stoke Road to the north. The landform is broadly level or gently undulating, with a gentle fall between 42m AOD in the east to approximately 22m AOD in the west close to the M5/A4019 Tewkesbury Road junction. Topography to the south-west of Elmstone Hardwicke is the least varied, creating the feeling of an open agricultural landscape. Variation increases only a little to the north and west of Elmstone Hardwicke. Land use is predominantly arable agriculture, a number of farms with associated ancillary buildings being scattered throughout the land. Fields are often large, although smaller particularly where closer to settlements. Field boundaries are marked by a network of hedgerows mostly in good condition, although gappy in places. This land plays a role in checking sprawl along the A4019 corridor through Uckington (the principal route to the M5 Junction 10), and while this function is clear, other Green Belt functions are much less obvious. This land plays only a limited role in maintaining separation between the settlements, the main purpose of the original designation. There are some urbanising uses where there has been encroachment around Mill Lane and Stoke Road at Stoke Orchard, but the majority of the area

has a relatively open feel. This area has a limited role in preserving the setting and special character of the historic towns as it is too remote to act as a setting.

## Land Making a Limited Contribution to Green Belt Purposes

- 5.2.10 A number of segments were identified as making a limited contribution to Green Belt purposes. This does not mean that they have no contribution to make or that the whole of the segment is of equal status; rather that as a whole the segment makes a limited contribution comparative to other segments.

### Land to the west of Innsworth, north of Longford and around Twigworth (Segments NW5, NW6, NW9)

- 5.2.11 The land is relatively flat, with the higher ground at approximately 12-18m AOD. Current land use is predominantly agricultural, with a number of fields used as pasture, separated by well maintained native hedges and occasional hedgerow trees offering varying degrees of enclosure. Around Dry Meadow Lane to the south of the area there is a sewage treatment works and a former landfill site. The A38 boundary is punctuated by a number of existing dispersed residential areas. There have been various intrusions into this area of the Green Belt through urban development in the vicinity of Innsworth and around Twigworth village along the A38. There is still an open feel and connection with the wider countryside of the Vale of Gloucester to the west and to a much lesser extent to the north towards Twigworth. However, this area plays a very limited role in preventing Gloucester and Cheltenham from merging and it has strong boundaries to prevent any further encroachment formed by the Hatherley Brook and further out by the A38/Hatherley Lane and Frogfurlong Lane. These factors, combined with the urbanising influences in the area result in the land making a limited contribution to the Green Belt purposes. This area has a limited role in preserving the setting and special character of historic towns. Further consideration of this area for release from the Green Belt is therefore warranted should other elements of the evidence base suggest a need to release Green Belt sites.

### Land to the north, west and east of Brockworth (Segments SE1, SE7, SE8, SE9)

- 5.2.12 The segments to the north and west of Brockworth have become strongly enclosed through urban development to the south in Brockworth (the edge of which is principally defined by Horsbere Brook), and the A417 to the north and other road developments in the case of segment SE9. The landform is gently undulating, falling from around 70m AOD in the east to approximately 40m AOD where it abuts the M5 Motorway. Land use is predominantly arable agriculture with moderately sized fields with reasonably strong hedgerow boundaries, creating a sense of openness in some areas, although to the west there is significant road infrastructure which has an urbanising feel. To the east there are a number of urbanising uses including the Sports Centre, Brockworth Enterprise School and the recently built housing at Mill Lane. The land has a limited role in relation to sprawl as demonstrated by the development around Mill Lane. The land forms a distinct parcel from the principal extent of Green Belt land separating Gloucester and Cheltenham. These segments have a limited role in preserving the setting and special character of historic towns as they form the northern edge to Gloucester, but are not key to its setting and they are separated from Gloucester by the M5. However, there is a visual connection between SE7 and SE8 and the Green Belt because of the A417 being in a cutting. The relatively recent construction of Valiant Way to provide access from Junction 11A of the M5 to Gloucester Business Park

has further subdivided this land (SE9), creating a sense of enclosure and detachment from adjacent segments and the wider Green Belt to the north.

- 5.2.13 Segment SE1 forms the transition between the urban edge of Gloucester and the Cotswold escarpment. The land is principally in agricultural use, rising from approximately 60m AOD in the west to 85m AOD in the east, with highly variable field size and field boundary structure. Intrusion by built development (notably to the east of the A46 Shurdington Road) compromises the sense of openness, this being compounded by a number of extensive agricultural buildings (Middle Pig Farm and Court Farm). This segment appears to be detached from the principal extent of the Green Belt to the north of the A417 and makes little contribution to the separation of Gloucester and Cheltenham or to preserving the setting and special character of Gloucester. Although segment SE1 makes a limited contribution to the Green Belt purposes, should Green Belt sites be needed to meet development requirements, the decision as to whether or not this site is suitable for development may be influenced by its location in the AONB, and other sustainable development considerations.
- 5.2.14 Whilst a limited contribution to Green Belt function remains, being both part of the land separating Gloucester and Cheltenham and preventing the further encroachment of Brockworth into what is still open countryside, these segments have to varying degrees become compromised by major road infrastructure, intrusive development, physical enclosure and functional separation from the main body of the Green Belt to the north. If, after considering other elements of the evidence base, this is to be considered for potential release, detailed appraisal of the form and function of this land and the potential consequences of release from the Green Belt is warranted particularly as it is contained by strong boundaries that will prevent encroachment and sprawl.

### Land to the west of Kingsditch and Swindon (Segments NE8, NE13)

- 5.2.15 These segments are of varying topography and land use, and although dominated by extensive arable agriculture, they are also characterised by ribbon development along the A4019. This consists of residential plots and a number of plant nurseries in the case of segment NE8, and rough pasture in the case of segment NE13 associated with the River Swilgate. The land performs a limited role in the separation of either Cheltenham and Gloucester or Cheltenham and Bishop's Cleeve, this being the function of segments to the south-west and east of this land. The land makes a limited contribution to preserving the setting and special character of historic towns as the visual connection with Cheltenham is limited.
- 5.2.16 Whilst this area of land is clearly part of the Green Belt as defined around Cheltenham in a broad sense, potential opportunities for boundary revision exist towards the south-east (principally segment NE8) without compromising its wider function. The absence of obvious strong boundaries within segment NE8 and N13 is problematic in respect of ready subdivision, although this is not insurmountable with careful masterplanning, in turn contributing to the containment of the pressures for expansion of the Kingsditch Trading Estate, which is currently characterised by an ill-defined boundary with the wider countryside to the north-west. If after considering other elements of the evidence base, this area is to be considered further for potential release from the Green Belt, strong long term boundaries would need to be created as part of any new development.

## 5.3 Recommendations

- 5.3.1 The results of this assessment (summarised above and set out in full in Appendix D) identify areas which merit further investigation for possible boundary review in the short and longer term depending on development requirements in the JCS area. Other policies, for example those relating to open countryside may also have to be used if any revisions are proposed to the Green Belt.
- 5.3.2 Table 5.2 summarises the evaluation for each of the segment clusters along with recommendations for the JCS authorities. The recommendations set out below need to be considered in the context of the rest of the evidence base, and should not be viewed in isolation.

**Table 5.2 Evaluation and Recommendations of Clusters**

Cluster	Component Segments	Contribution to Green Belt Purposes - Overall Grade	Evaluation and Recommendations
Land Between Bishop's Cleeve & Cheltenham	NE14, NE15, NE16, NE17, NE18, NE19, NE20, NE21, NE22	Significant Contribution	<p><b>Evaluation against Purposes:</b></p> <ul style="list-style-type: none"> <li>• <b>Check unrestricted sprawl:</b> in particular the segments adjoining the urban areas of Cheltenham and Bishop's Cleeve make a significant contribution towards preventing sprawl in various locations where there is already some evidence of ribbon development.</li> <li>• <b>Prevent merger:</b> these segments make a significant contribution towards the separation of Cheltenham and Bishop's Cleeve.</li> <li>• <b>Safeguard countryside from encroachment:</b> although there are significant urbanised areas associated with Cheltenham racecourse and associated development, much of the land is open. There are no strong boundaries to contain development.</li> <li>• <b>Preserve the setting of towns:</b> the majority of the segments form part of the wider setting for Cheltenham and the racecourse.</li> </ul> <p><b>Other Factors:</b></p> <ul style="list-style-type: none"> <li>• <b>Existing land use:</b> predominantly mixed arable/pasture with strong field boundaries.</li> <li>• <b>Proximity and relationship to the built-up area:</b> strong connections with both Cheltenham and Bishop's Cleeve.</li> <li>• <b>Degree of enclosure/openness:</b> strong field boundaries and isolated copses limit extensive views, but the overall impression is one of open countryside. However, significant urbanised intrusions associated with Cheltenham racecourse and immediate environs compromise this openness towards the east of the belt.</li> <li>• <b>Distance and visual connection to historic urban centres/key urban areas:</b> sets the context for Cheltenham and the racecourse, in particular.</li> <li>• <b>Relationship to the countryside:</b> forms a critical connection between wider countryside to the east and west.</li> </ul>



Cluster	Component Segments	Contribution to Green Belt Purposes - Overall Grade	Evaluation and Recommendations
			<b><u>RECOMMENDATION: maintenance of the separation between Cheltenham and Bishop's Cleeve is critical to fulfilling the purpose of Green Belt designation (as extended in 1981) and these segments play an important role in this. Therefore this area does not merit further consideration for release from the Green Belt at this stage unless other elements of the evidence base strongly suggest otherwise.</u></b>
Land to the north-west of Cheltenham	NE9, NE10, NE11, NE12	Contribution	<p><b>Evaluation against Purposes:</b></p> <ul style="list-style-type: none"> <li>• <b>Check unrestricted sprawl:</b> these areas play a role in limiting sprawl and preventing further ribbon development along the A4019 and M5.</li> <li>• <b>Prevent merger:</b> limited role in this.</li> <li>• <b>Safeguard countryside from encroachment:</b> predominantly open agricultural land although there are a number of buildings throughout the area. There are no strong boundaries to contain development longer term.</li> <li>• <b>Preserve the setting of towns:</b> limited role in this as most of the land is too remote.</li> </ul> <p><b>Other Factors:</b></p> <ul style="list-style-type: none"> <li>• <b>Existing land use:</b> predominantly mixed arable/pasture with strong field boundaries.</li> <li>• <b>Proximity and relationship to the built-up area:</b> limited overall, but forms part of Cheltenham's north-western boundary.</li> <li>• <b>Degree of enclosure/openness:</b> strong field boundaries with extensive views across the segment and towards the Cotswold scarp to the east, in particular.</li> <li>• <b>Distance and visual connection to historic urban centres/key urban areas:</b> whilst adjacent to Cheltenham's north-west boundary, performs a limited function as context for the urban area.</li> <li>• <b>Relationship to the countryside:</b> performs a role of connecting the urban fringe of Cheltenham with the wider countryside, but open countryside only really becomes apparent beyond Uckington.</li> </ul> <p><b><u>RECOMMENDATION: Overall, these segments make a contribution to Green Belt purposes by preventing sprawl and encroachment. These segments do not merit further consideration for release from the Green Belt at this stage unless other elements of the evidence base strongly suggest otherwise.</u></b></p>
Land to the west of Kingsditch and Swindon	NE8, NE13	Limited Contribution	<p><b>Evaluation against Purposes:</b></p> <ul style="list-style-type: none"> <li>• <b>Check unrestricted sprawl:</b> significant ribbon development along the A4019. This area makes a limited contribution to preventing sprawl.</li> <li>• <b>Preventing merger:</b> limited contribution as it is the land to the east and southwest that have a greater role in separation.</li> <li>• <b>Safeguard countryside from encroachment:</b> part of this area does make a contribution to preventing encroachment, although creating stronger boundaries would contain the development.</li> <li>• <b>Preserve the setting of towns:</b> limited contribution as there is limited visual</li> </ul>

Cluster	Component Segments	Contribution to Green Belt Purposes - Overall Grade	Evaluation and Recommendations
			<p>connection with Cheltenham.</p> <p><b>Other Factors</b></p> <ul style="list-style-type: none"> <li>• <b>Existing land use:</b> predominantly mixed arable/pasture with strong field boundaries.</li> <li>• <b>Proximity and relationship to the built-up area:</b> limited overall, but forms part of Cheltenham's north-western boundary.</li> <li>• <b>Degree of enclosure/openness:</b> limited field boundaries with some extensive views, particularly from the outer extent of the segments.</li> <li>• <b>Distance and visual connection to historic urban centres/key urban areas:</b> whilst adjacent to Cheltenham's north-west boundary, performs a limited function as context for the urban area.</li> <li>• <b>Relationship to the countryside:</b> performs a role of connecting the urban fringe of Cheltenham with the wider countryside, but open countryside only really becomes apparent beyond Uckington.</li> </ul> <p><b>RECOMMENDATION:</b> whilst containing Cheltenham on its north-western boundary, extensive ribbon development along the north side of the A4019 severely limits the sense of openness of the southern portion and compromises its overall Green Belt function. Segments NE8 and NE13 are of a similar character, separated only by the reasonably strong boundary feature of Dog Bark Lane. Towards their western reaches, both segments increasingly share characteristics and functions of the outer segments of the Green Belt and therefore merit further consideration for possible release should other elements of the evidence base suggest that it may be appropriate.</p>
Land between Cheltenham & Gloucester to the east of the M5	SE2, SE3, SE4, SE5, SE6, SE10	Significant Contribution	<p><b>Evaluation against Purposes:</b></p> <ul style="list-style-type: none"> <li>• <b>Check unrestricted sprawl:</b> certain segments make a significant contribution to preventing sprawl, particularly in limiting ribbon development along the A46 and A40, although there is already ribbon development in a number of locations.</li> <li>• <b>Preventing merger:</b> significant contribution to preventing merger of Leckhampton and Shurdington, thus separating Cheltenham and Gloucester and preventing merging along the A40 at the narrowest part of the Green Belt.</li> <li>• <b>Safeguard countryside from encroachment:</b> significant contribution as there are few strong long term defensible boundaries, and in particular the north-eastern boundary at Leckhampton is weak. There is still an open feel despite the encroachment that has taken place.</li> <li>• <b>Preserve the setting of towns:</b> maintains the setting for Cheltenham and plays a role in maintaining the special character including views from Leckhampton Hill and environs.</li> </ul> <p><b>Other Factors:</b></p> <ul style="list-style-type: none"> <li>• <b>Existing land use:</b> predominantly mixed arable/pasture with strong field boundaries.</li> <li>• <b>Proximity and relationship to the built-up area:</b> adjacent to Cheltenham to the north, separated from Gloucester to the South by the strong boundary of</li> </ul>

Cluster	Component Segments	Contribution to Green Belt Purposes - Overall Grade	Evaluation and Recommendations
			<p>the A417.</p> <ul style="list-style-type: none"> <li><b>Degree of enclosure/openness:</b> strong field boundaries and isolated copses limit extensive views, but the overall impression is one of open countryside.</li> <li><b>Distance and visual connection to historic urban centres/key urban areas:</b> varying views given enclosure, but sets the context for Cheltenham, particularly as viewed from the Cotswold scarp to the east.</li> <li><b>Relationship to the countryside:</b> forms a critical connection between wider countryside to the east and west.</li> </ul> <p><b>RECOMMENDATION: critical to the separation of Cheltenham and Gloucester, being the original purpose of Green Belt designation. Critical to preventing ribbon development along the A40 and A46. Re-definition of the inner boundaries of segment SE3 could be required, perhaps along Field Lane, to provide a firmer long-term boundary. These segments do not merit further consideration for release from the Green Belt at this stage unless other elements of the evidence base strongly suggest otherwise.</b></p>
Land between Gloucester and Churchdown to the west of the M5	SW1, SW2, SW3, SW4, SW5, NW4	Significant Contribution	<p><b>Evaluation against Purposes:</b></p> <ul style="list-style-type: none"> <li><b>Check unrestricted sprawl:</b> performs key role in preventing sprawl from Churchdown and is critical to preventing separation along the A40 corridor.</li> <li><b>Prevent merger:</b> significant contribution to this in an area where the gap is at its narrowest.</li> <li><b>Safeguard the countryside from encroachment:</b> there are few strong long term boundaries which would not result in the merging of Churchdown and Gloucester.</li> <li><b>Preserve the setting of towns:</b> provides the setting from North Gloucester.</li> </ul> <p><b>Other factors:</b></p> <ul style="list-style-type: none"> <li><b>Existing land use:</b> predominantly mixed arable/pasture with strong field boundaries.</li> <li><b>Proximity and relationship to the built-up area:</b> adjacent to Churchdown and the northern edge of Gloucester, effectively containing their spread into open countryside and particularly the narrow gap between Churchdown and Cheltenham</li> <li><b>Degree of enclosure/openness:</b> strong field boundaries and isolated copses limit extensive views, but the overall impression is one of open countryside when viewed from the M5 in particular. Churchdown Hill forms a particularly strong focal point for views within this and remoter tracts of Green Belt land.</li> <li><b>Distance and visual connection to historic urban centres/key urban areas:</b> Churchdown Hill in particular is a focal point for views from, and into, Gloucester.</li> <li><b>Relationship to the countryside:</b> part of the wider belt of land separating Cheltenham and Gloucester.</li> </ul> <p><b>RECOMMENDATION: critical to the separation of Cheltenham and Gloucester, being the original purpose of designation. These segments do</b></p>

Cluster	Component Segments	Contribution to Green Belt Purposes - Overall Grade	Evaluation and Recommendations
			<b><u>not merit further consideration for release from the Green Belt at this stage unless other elements of the evidence base strongly suggest otherwise.</u></b>
Land to the north, west and east of Brockworth	SE1, SE7, SE8, SE9	Limited Contribution	<p><b>Evaluation against Purposes:</b></p> <ul style="list-style-type: none"> <li>• <b>Check unrestricted sprawl:</b> limited contribution as there has already been ribbon development/sprawl in this area.</li> <li>• <b>Prevent merger:</b> limited contribution. Although it is part of the land separating the settlements, it is limited due to severance by the strong boundary of the A417.</li> <li>• <b>Safeguard the countryside from encroachment:</b> limited contribution in preventing northward spread of Brockworth as there is development around Mill Lane, the Leisure Centre and school. Clear strong long term boundary formed by A417 which would contain development.</li> <li>• <b>Preserve the setting of towns:</b> limited contribution given distance from Gloucester.</li> </ul> <p><b>Other Factors:</b></p> <ul style="list-style-type: none"> <li>• <b>Existing land use:</b> predominantly mixed arable/pasture with strong field boundaries.</li> <li>• <b>Proximity and relationship to the built-up area:</b> forms the urban fringe to Gloucester.</li> <li>• <b>Degree of enclosure/openness:</b> of open character but built development has intruded and to the west road infrastructure dominates.</li> <li>• <b>Distance and visual connection to historic urban centres/key urban areas:</b> limited visual connection with Gloucester.</li> <li>• <b>Relationship to the countryside:</b> visual connection with open countryside to the north across the A417, the latter being in a cutting. Limited functional relationship, however.</li> <li>• <b>RECOMMENDATION: whilst forming the immediate boundary to Gloucester, intrusion of urban uses compromises its sense of openness. Severance from the main Green Belt tract to the north by the A417 further limits its function, meaning that there could be opportunities for re-examining its designation and boundaries. There would be no risk of sprawl or encroachment due to the strength of the A417 as a boundary. The segments enclosure on all sides by major roads results in them serving little or no Green Belt function. There is therefore in considering these segments for possible release should other elements of the evidence base suggest that it may be appropriate.</b></li> </ul>
Land between Cheltenham and the M5 north of the A40	NE1, NE2, NE3, NE4, NE5, NE6, NE7	Significant Contribution	<p><b>Evaluation against Purposes:</b></p> <ul style="list-style-type: none"> <li>• <b>Check unrestricted sprawl:</b> significant contribution as western boundary prevents sprawl from Gloucester and the segments prevent ribbon development along the A40 and A4019, although some areas are already urbanised.</li> <li>• <b>Prevent merger:</b> significant contribution as this is a narrow part of the gap between Cheltenham and Innsworth/Churchdown.</li> <li>• <b>Safeguard the countryside from encroachment:</b> few long term strong boundary options that would prevent encroachment and would not result in</li> </ul>



Cluster	Component Segments	Contribution to Green Belt Purposes - Overall Grade	Evaluation and Recommendations
			<p>the merger of Gloucester and Cheltenham at this narrow point in the Green Belt.</p> <ul style="list-style-type: none"> <li>• <b>Preserve the setting of towns:</b> provides countryside setting to Cheltenham.</li> </ul> <p><b>Other Factors:</b></p> <ul style="list-style-type: none"> <li>• <b>Existing land use:</b> predominantly mixed arable/pasture with strong field boundaries.</li> <li>• <b>Proximity and relationship to the built-up area:</b> forms the western envelope of Cheltenham.</li> <li>• <b>Degree of enclosure/openness:</b> variable, particularly towards the urban fringe, but generally open to extensive views across through the tract and to the north and south.</li> <li>• <b>Distance and visual connection to historic urban centres/key urban areas:</b> provides the setting for Cheltenham.</li> <li>• <b>Relationship to the countryside:</b> forms a direct connection between the urban fringe and open countryside to the west beyond the M5.</li> </ul> <p><b><u>RECOMMENDATION: critical to preventing the sprawl of Cheltenham and towards the south the merger of Cheltenham and Churchdown. Therefore this area does not merit further consideration for potential release from the Green Belt at this stage unless other elements of the evidence base strongly suggest otherwise.</u></b></p>
Land to the west of the M5, north of the A40, and north and southwest of Churchdown	NW1, NW2, NW3	Significant Contribution	<p><b>Evaluation against Purposes:</b></p> <ul style="list-style-type: none"> <li>• <b>Check unrestricted sprawl:</b> significant contribution in containing airport and employment related sprawl and eastward sprawl of Churchdown along the A40.</li> <li>• <b>Prevent merger:</b> significant contribution which is particularly key at this narrowest part of the gap.</li> <li>• <b>Safeguard countryside from encroachment:</b> contribution, although there are a number of urbanising influences associated with the airport and employment uses. There are few strong boundaries to prevent development in the longer term.</li> <li>• <b>Preserve the setting of towns:</b> some contribution although some distance from centre of Gloucester and Cheltenham.</li> </ul> <p><b>Other Factors:</b></p> <ul style="list-style-type: none"> <li>• <b>Existing land use:</b> dominated by Gloucestershire Airport and associated uses, including large industrial estates on land excluded from the Green Belt. Remnant parcels of pasture (NW1) and arable land (NW3).</li> <li>• <b>Proximity and relationship to the built-up area:</b> forms the north-western boundary of Churchdown with ready access via the B4063.</li> <li>• <b>Degree of enclosure/openness:</b> flat land with variable degrees of openness, particularly in the vicinity of Gloucester Airport where the paraphernalia associated with the Airport, and large commercial sites which have been excluded from the Green Belt, can interrupt extensive views towards the Cotswold scarp to the east and wider countryside to the west.</li> <li>• <b>Distance and visual connection to historic urban centres/key urban</b></li> </ul>

Cluster	Component Segments	Contribution to Green Belt Purposes - Overall Grade	Evaluation and Recommendations
			<p><i>areas:</i> none.</p> <ul style="list-style-type: none"> <li><b>Relationship to the countryside:</b> part of the transition to the wider countryside of the Vale of Gloucester to the north and west.</li> </ul> <p><b>RECOMMENDATION:</b> <u>land which is critical to preventing the closing of the gaps between Cheltenham and Churchdown (being already heavily intruded in developments associated with Gloucestershire Airport, and Gloucester and Churchdown) and preventing merger along the A40. Therefore this land does not merit further consideration for potential release from the Green Belt at this stage unless other elements of the evidence base strongly suggest otherwise.</u></p>
Land to the north of Innsworth	NW7, NW8	Significant Contribution	<p><b>Evaluation against Purposes:</b></p> <ul style="list-style-type: none"> <li><b>Check unrestricted sprawl:</b> prevents sprawl from Innsworth and employment uses and ribbon development along the B4063.</li> <li><b>Prevent merger:</b> significant contribution as it prevents Cheltenham and Innsworth/Churchdown from merging.</li> <li><b>Safeguard countryside from encroachment:</b> prevents encroachment of Innsworth/employment areas in this narrow part of the gap between Cheltenham and Gloucester. Although there are strong boundaries, NW8 is divorced from the urban edge.</li> <li><b>Preserve the setting of towns:</b> some contribution, providing the setting for Innsworth/Churchdown, but distant from Cheltenham and Gloucester's historic centres.</li> </ul> <p><b>Other Factors:</b></p> <ul style="list-style-type: none"> <li><b>Existing land use:</b> dominated by the Brockhampton Court Golf Complex, retaining a predominantly rural aspect.</li> <li><b>Proximity and relationship to the built-up area:</b> limited but forms the northern boundary of Innsworth.</li> <li><b>Degree of enclosure/openness:</b> variable, openness often limited by extensive tree planting associated with the golf course.</li> <li><b>Distance and visual connection to historic urban centres/key urban areas:</b> none.</li> <li><b>Relationship to the countryside:</b> part of the transition to the wider countryside of the Vale of Gloucester to the north and west.</li> </ul> <p><b>RECOMMENDATION:</b> <u>critical to preventing the closing of the gap between Cheltenham and Churchdown, particularly towards the east of these segments. Critical to prevention of sprawl through ribbon development. Therefore this land does not merit further consideration for potential release from the Green Belt at this stage unless other elements of the evidence base strongly suggest otherwise.</u></p>
Land to the west of the M5 and north of the B4063	NW10, NW11	Significant Contribution	<p><b>Evaluation against Purposes:</b></p> <ul style="list-style-type: none"> <li><b>Check unrestricted sprawl:</b> significant contribution in preventing sprawl from smaller settlements and employment areas and in preventing ribbon development along the A38, B4063 and B4634.</li> </ul>

Cluster	Component Segments	Contribution to Green Belt Purposes - Overall Grade	Evaluation and Recommendations
			<ul style="list-style-type: none"> <li>• <b>Prevent merger:</b> southern part of area in particular makes a significant contribution to maintaining separation between Cheltenham and Gloucester (Churchdown).</li> <li>• <b>Safeguard countryside from encroachment:</b> existing boundaries are weak in particular to the south, with no strong boundaries to contain encroachment longer term.</li> <li>• <b>Preserve the setting of towns:</b> limited contribution due to remoteness from historic centres of Gloucester and Cheltenham.</li> </ul> <p><b>Other Factors:</b></p> <ul style="list-style-type: none"> <li>• <b>Existing land use:</b> predominantly mixed arable/pasture with strong field boundaries and a great diversity of field sizes and shapes.</li> <li>• <b>Proximity and relationship to the built-up area:</b> limited, forming the wider north-western extent of the Green Belt.</li> <li>• <b>Degree of enclosure/openness:</b> predominantly open, although locally variable where field boundaries are stronger, woodland patches are present or the land is settled (such as Staverton).</li> <li>• <b>Distance and visual connection to historic urban centres/key urban areas:</b> none.</li> <li>• <b>Relationship to the countryside:</b> an intrinsic part of the wider Vale of Gloucester to the west of this land.</li> <li>• <b>RECOMMENDATION:</b> <u>forms the bulk of the extent of the Green Belt in this north western quarter, with separation function stronger towards the south and eastern extent of these segments. There are currently weak boundaries with no obvious boundaries to prevent longer term encroachment. The segments prevent merger through ribbon development along the A38, B4063 and B4634. Therefore this does not merit further consideration for potential release from the Green Belt at this stage unless other elements of the evidence base strongly suggest otherwise.</u></li> </ul>
Land to the west of Innsworth, north of Longford and around Twigworth	NW5, NW6, NW9	Limited Contribution	<p><b>Evaluation against Purposes:</b></p> <ul style="list-style-type: none"> <li>• <b>Check unrestricted sprawl:</b> limited contribution in preventing sprawl/ribbon development between Twigworth and Longford.</li> <li>• <b>Prevent merger:</b> limited contribution as development here would not bring Cheltenham and Gloucester closer together.</li> <li>• <b>Safeguard countryside from encroachment:</b> limited contribution as there have already been some intrusions at Twigworth, and there are opportunities to create stronger long-term boundaries.</li> <li>• <b>Preserve the setting of towns:</b> limited contribution as no real connection with Gloucester.</li> </ul> <p><b>Other Factors:</b></p> <ul style="list-style-type: none"> <li>• <b>Existing land use:</b> predominantly mixed arable/pasture with reasonably strong field boundaries.</li> <li>• <b>Proximity and relationship to the built-up area:</b> southern part forms the western boundary to Innsworth.</li> </ul>

Cluster	Component Segments	Contribution to Green Belt Purposes - Overall Grade	Evaluation and Recommendations
			<ul style="list-style-type: none"> <li>• <b>Degree of enclosure/openness:</b> predominantly open with extensive views across to adjacent tracts and distant focal points (principally Churchdown Hill).</li> <li>• <b>Distance and visual connection to historic urban centres/key urban areas:</b> forms the context for Gloucester as approached from the north along the A38.</li> <li>• <b>Relationship to the countryside:</b> forms the transition to the wider countryside of the Vale of Gloucester.</li> </ul> <p><b><u>RECOMMENDATION: the openness of this tract is compromised by intrusive development. Combined with a very limited function in preventing the merger of towns, should other elements of the evidence base suggest it is appropriate, there is a case for re-examining its boundaries, particularly in relation to Innsworth, where existing boundary features could be readily used to create new long-term boundaries and there are strong boundary options.</u></b></p>

## 5.4 Assessment of Potential Additions to Green Belt

- 5.4.1 The study brief also identified the need for the assessment to include potential areas for addition to the Green Belt. As part of the assessment process, a number of areas which could merit further study for potential additions to the Green Belt have been identified. These broad areas are shown in Figure 5.3. The areas to the south (south of Leckhampton) and east of Cheltenham were selected on the basis that they were the key areas adjoining the urban area that were not currently designated as Green Belt. The area to the west of the M5 around Hardwicke was selected on the basis that land to the east and south-west was included in the Green Belt.
- 5.4.2 The land to the north of Bishop's Cleeve was included on the basis that land to the south of Bishop's Cleeve is included in the Green Belt and this area was proposed as an extension to the Green Belt in the Draft RSS for the South West, although the Panel later recommended that additions to the Green Belt were not appropriate in light of PPG2 and the original purpose of designation. The land along the western edge of Gloucester was an area that was suggested for possible inclusion in the Green Belt through the previous Joint Study Area (JSA) work, the reason being that it may assist in safeguarding the historic setting of central Gloucester. Land to the south-east of Gloucester, around Robins Wood Hill, was also identified in the JSA work as a possible addition to the Green Belt. The southern part of Tewkesbury Borough, south-east of Brockworth (east of the A46, south of the A417) is also included for consideration. These areas are all within the JCS area. Land in neighbouring authorities has not been considered as it is not part of the remit of this study.
- 5.4.3 PPG2 does not make any reference to increasing the Green Belt area solely to compensate for other areas that may be removed from the Green Belt for development and therefore any areas to be included in the Green Belt should make a contribution to the purposes of including land in the Green Belt, and



importantly they should play a role in the key purpose of designation of the Green Belt in this location, maintaining the separation between Gloucester and Cheltenham and between Cheltenham and Bishop's Cleeve. The assessment of potential new areas of Green Belt is the same as the assessment of possible releases from the Green Belt, and as with the other segments, the fifth Green Belt purpose of assisting in urban regeneration by encouraging the recycling of derelict and other urban land has been screened out as it could equally apply to all areas. There are few examples to draw on from other authorities where significant areas of Green Belt have been added.

- 5.4.4 Table 5.3 describes the areas considered in more detail and sets out the results of an evaluation of these areas against the five purposes of including land in Green Belts. Based on this evaluation the table also sets out recommendations as to whether or not the particular area should be considered further by the JCS authorities as potential additions to the Green Belt. As with the recommendations relating to areas for possible release from the Green Belt, these areas should not be considered in isolation and need to be considered in the context of the rest of the Core Strategy evidence base.

**Table 5.3 Evaluation and Recommendations for Areas Considered for Addition to the Green Belt**

Area and rationale for consideration	Evaluation	Recommendation
<p><b>Land to the south-west of Leckhampton, south-west of Farm Lane</b></p> <p>To ensure robustness of the inner boundaries of Green Belt making a significant contribution to separation of Gloucester and Cheltenham.</p> <ul style="list-style-type: none"> <li><b>Existing land use:</b> improved grazing.</li> <li><b>Proximity and relationship to the built-up area:</b> immediately to the east of Brizen Lane.</li> <li><b>Degree of enclosure/openness:</b> open with remnant hedgerows associated with a previously finer-grained field pattern.</li> <li><b>Distance and visual connection to historic urban centres/key urban areas:</b> none</li> <li><b>Relationship to the countryside:</b> adjacent to open countryside to the south and west.</li> </ul>	<p><b>Check unrestricted sprawl</b> - would help to form part of a more substantive barrier preventing the outward expansion of Leckhampton. Would prevent ribbon development on the western side of Farm Lane and around Brizen Lane.</p> <p><b>Prevent merger</b> - would contribute to the separation of Leckhampton and Shurdington.</p> <p><b>Safeguard countryside from encroachment</b> - stronger long term boundary at Farm Lane would prevent encroachment.</p> <p><b>Preserve the setting of towns</b> - limited role.</p>	<p>A relatively strong case for inclusion given that this parcel effectively forms part of segment SE3, being of similar land use and open character. The existing inner boundary of the Green Belt is defined by a weak drainage ditch and hedge; Farm Lane, by contrast, is a well-defined and more logical boundary to this segment preventing ribbon development. The precise line of the boundary around Brizen Lane/The Lanes would require careful consideration.</p>
<p><b>Land to the south-west of Leckhampton, east/north-east of Farm Lane (between Farm Lane, Kidnappers Lane and Church Road)</b></p> <p>To help maintain the openness of this piece of land, enclosed by the expansion of Leckhampton to the east and Warden Hill to the west.</p> <ul style="list-style-type: none"> <li><b>Existing land use:</b> rough and improved grazing and remnant orchards (in its southern portion bounded by Farm Lane, Kidnappers Lane and Church Road) and rough grazing, sports pitches/open space and nursery enterprises (one functioning, one redundant) in its northern portion (between Kidnappers Lane and the urban edge of</li> </ul>	<p><b>Check unrestricted sprawl</b> - could help to prevent the outward expansion of Leckhampton and ribbon development along Church Road and Kidnappers Lane, although already sprawl around Brizen Lane.</p> <p><b>Prevent merger</b> - contribution, although limited due to the development around Brizen Lane which already brings Cheltenham closer to</p>	<p>The connectivity of this land with the wider countryside is relatively strong, particularly to the south-east across Church Road, and well defined by boundary roads. However, the development at Brizen Lane/The Lanes has intruded into open countryside. The area is effectively surrounded by Green Belt on three sides.</p> <p>Land to the north-east of Farm Lane does not merit consideration for inclusion given that it does not play a role in terms of maintaining the gap</p>

Area and rationale for consideration	Evaluation	Recommendation
<p>Leckhampton).</p> <ul style="list-style-type: none"> <li><b>Proximity and relationship to the built-up area:</b> generally in close proximity to the urban edge of Leckhampton.</li> <li><b>Degree of enclosure/openness:</b> openness limited by complex field structure and overgrown hedgerow boundaries. Land retains more of an agricultural function in its southern portion.</li> <li><b>Distance and visual connection to historic urban centres/key urban areas:</b> no immediate connection.</li> <li><b>Relationship to the countryside:</b> strong connectivity for the southerly portion (across Farm Lane and Church Road), but limited for the northern portion being enclosed by the A46 to the west, Kidnappers Lane to the south and urban development to the north and east.</li> </ul>	<p>Shurdington.</p> <p><b>Safeguard countryside from encroachment</b> - this area is already surrounded by development on three sides, and so plays a limited role in safeguarding the countryside. Farm Lane boundary option would be strong long term boundary.</p> <p><b>Preserve the setting of towns</b> - no direct role.</p>	<p>between Gloucester and Cheltenham, the key Green Belt purpose in this location.</p> <p>Other planning policies could be used here as appropriate to control development.</p>
<p><b>Land on the eastern fringe of Cheltenham, stretching from Leckhampton in the south to Woodmancote in the north</b></p> <p>Deflected pressure from development restraint around western Cheltenham.</p> <ul style="list-style-type: none"> <li><b>Existing land use:</b> various, although dominated by grazing.</li> <li><b>Proximity and relationship to the built-up area:</b> forms the eastern boundary to Cheltenham.</li> <li><b>Degree of enclosure/openness:</b> highly variable field size and degree of enclosure, determined by topography of the scarp slope.</li> <li><b>Distance and visual connection to historic urban centres/key urban areas:</b> important backdrop to Cheltenham, with views directly into the historic centre.</li> <li><b>Relationship to the countryside:</b> forms the open countryside to the east of Cheltenham.</li> </ul>	<p><b>Check unrestricted sprawl</b> - would assist in preventing ribbon development along the A435, A40, and B4632.</p> <p><b>Prevent merger</b> - no direct role</p> <p><b>Safeguard countryside from encroachment</b> - few strong boundaries to prevent longer term development.</p> <p><b>Preserve the setting of towns</b> - would assist in maintaining open views into Cheltenham.</p>	<p>No clear case for inclusion, notwithstanding pressure for eastward expansion. Land plays no role in separation between Cheltenham and Gloucester, or Cheltenham and Bishop's Cleeve. Land is covered by AONB designation. No obvious inner or outer boundary exists (apart from the B4362 at Southam), making physical definition of the land very difficult. The control of encroachment into open countryside, for example, could be addressed through other planning policies.</p>
<p><b>Land to the north of Bishop's Cleeve stretching in an arc from Stoke Road to the Honeybourne Railway Line</b></p> <p>Deflected pressure from development constraints around Cheltenham.</p> <ul style="list-style-type: none"> <li><b>Existing land use:</b> grazing/arable.</li> <li><b>Proximity and relationship to the built-up area:</b> forming the countryside fringe of Bishop's Cleeve.</li> <li><b>Degree of enclosure/openness:</b> open, extensive landscape with distant views to the west, north and east.</li> <li><b>Distance and visual connection to historic urban centres/key urban areas:</b> none.</li> <li><b>Relationship to the countryside:</b> part of open countryside extending northwards to Gotherington and north-westwards towards Tewkesbury.</li> </ul>	<p><b>Check unrestricted sprawl</b> - possible role in limiting ribbon development along A435 and Gotherington Road.</p> <p><b>Prevent merger</b> - no direct role.</p> <p><b>Safeguard countryside from encroachment</b> - no strong boundary options to prevent longer term development.</p> <p><b>Preserve the setting of towns</b> - no direct role.</p>	<p>No clear case for inclusion, given that the land performs no Green Belt role as defined by the original reasons for designation. There are no obvious strong boundaries to prevent longer term development. The control of encroachment into open countryside, for example, could be addressed through other planning policies.</p>

Area and rationale for consideration	Evaluation	Recommendation
<p><b>Land to the west of the M5, north of the A4019, east of the A38</b></p> <p>Deflected development pressure centred on M5 Junction 10.</p> <ul style="list-style-type: none"> <li><b>Existing land use:</b> intensively farmed arable and grazing with significant variation in field patterns and strength of boundaries.</li> <li><b>Proximity and relationship to the built-up area:</b> none.</li> <li><b>Degree of enclosure/openness:</b> open landscape, defined by the M5 to the east, the A4019 to the south, the A38 to the west and Cursey Lane/Stoke Road to the north.</li> <li><b>Distance and visual connection to historic urban centres/key urban areas:</b> no visual connection.</li> <li><b>Relationship to the countryside:</b> part of the open countryside extending to Tewkesbury to the north.</li> </ul>	<p><b>Check unrestricted sprawl</b> - no direct role as it does not adjoin the urban area.</p> <p><b>Prevent merger</b> - no direct role.</p> <p><b>Safeguard countryside from encroachment</b> - limited strong long term boundary options.</p> <p><b>Preserve the setting of towns</b> - no direct role.</p>	<p>Although there may be pressure for development which could be deflected over the M5 from restricted opportunities around Cheltenham, the land does not play any role in the separation of Cheltenham and Gloucester and therefore there is no case for inclusion.</p>
<p><b>Land along the western edge of Gloucester</b></p> <p>To assist in safeguarding the historic centre of Gloucester</p> <ul style="list-style-type: none"> <li><b>Existing land use:</b> various including grazing/arable further north, industrial, floodplain.</li> <li><b>Proximity and relationship to the built-up area:</b> forms north western part of Gloucester and area between canal and River Severn.</li> <li><b>Degree of enclosure/openness:</b> variable field size and land uses.</li> <li><b>Distance and visual connection to historic urban centres/key urban areas:</b> part of area in relatively close proximity to historic centre of Gloucester.</li> <li><b>Relationship to the countryside:</b> varying with northern area forming part of open countryside.</li> </ul>	<p><b>Check unrestricted sprawl</b> - would assist in preventing westward expansion of Gloucester and ribbon development although much of area is at risk of flooding and therefore unlikely to be suitable for residential development.</p> <p><b>Prevent merger</b> - no direct role.</p> <p><b>Safeguard countryside from encroachment</b> - few strong long term boundary options to contain development, although much of area is floodplain.</p> <p><b>Preserve the setting of towns</b> - would assist in maintaining open views into Gloucester.</p>	<p>No clear case for inclusion, given that the land performs only a limited Green Belt role as defined by the original reasons for designation. The control of encroachment into open countryside, for example, could be addressed through other planning policies.</p> <p>This area was suggested as a possible area for inclusion in the previous JSA work.</p>
<p><b>Land to the south-east of Gloucester, around Robins Wood Hill</b></p> <p>To provide protection to the countryside character of the area</p> <ul style="list-style-type: none"> <li><b>Existing land use:</b> Country Park including golf course and leisure uses, and some arable.</li> <li><b>Proximity and relationship to the built-up area:</b> close proximity to built up area to north, east and west.</li> <li><b>Degree of enclosure/openness:</b> Country Park enclosed by surrounding built development, but open feel towards motorway to south-east.</li> <li><b>Distance and visual connection to historic urban centres/key urban areas:</b> some visual connection.</li> <li><b>Relationship to the countryside:</b> varying with south-</li> </ul>	<p><b>Check unrestricted sprawl</b> - limited role in preventing ribbon development and northern part of area is protected as Country Park.</p> <p><b>Prevent merger</b> - no direct role.</p> <p><b>Safeguard countryside from encroachment</b> - much of land is surrounded by development on three sides. M5 would provide long term boundary to south-east.</p> <p><b>Preserve the setting of towns</b> - would assist in preserving the setting of this part of Gloucester, although this is already</p>	<p>No clear case for inclusion, given that the land does not perform the Green Belt role as defined by the original reasons for designation and this area would not physically link to the main area of Green Belt. Unrestricted sprawl could be controlled through other policy measures.</p> <p>The area was suggested as a possible area for inclusion in the previous JSA work.</p>

Area and rationale for consideration	Evaluation	Recommendation
eastern part forming part of open countryside, although presence of motorway.	protected through the Country Park.	
<p><b>South-east of Brockworth (east of the A46, south of the A417)</b></p> <p>To provide protection to the countryside character of the area</p> <ul style="list-style-type: none"> <li>• <b>Existing land use:</b> varying, some arable.</li> <li>• <b>Proximity and relationship to the built-up area:</b> limited proximity to built up area, although links to south-eastern part of Brockworth across A46.</li> <li>• <b>Degree of enclosure/openness:</b> much of area is very open.</li> <li>• <b>Distance and visual connection to historic urban centres/key urban areas:</b> views from Coopers Hill.</li> <li>• <b>Relationship to the countryside:</b> strong relationship particularly to south and east.</li> </ul>	<p><b>Check unrestricted sprawl</b> - may assist in preventing south-eastern expansion of Brockworth and ribbon development in this area.</p> <p><b>Prevent merger</b> - no direct role.</p> <p><b>Safeguard countryside from encroachment</b> - no obvious strong long term boundaries.</p> <p><b>Preserve the setting of towns</b> - no direct role.</p>	<p>No clear case for inclusion, given that the land does not perform the Green Belt role as defined by the original reasons for designation. This area is already protected by AONB designation which will assist in preventing unrestricted sprawl.</p>

- 5.4.5 Overall, the case for extension of the Green Belt is a limited one, with land immediately to the south of Cheltenham (south of Leckhampton, south-west of Farm Lane) having the strongest case. National Policy, in the form of PPG2 and emerging policy in the form of the Draft National Planning Policy Framework, does not make any reference to designating ‘compensatory’ Green Belt land and therefore any additions need to meet the purposes of including land in Green Belts and particularly the purpose of separation between Cheltenham and Gloucester. Apart from land south-west of Farm Lane, none of the other areas considered play a role in the separation of Cheltenham and Gloucester. Restraint policies other than Green Belt policies could be used to manage development in those areas where there is particular development pressure.

## 5.5 Comparison of Results with Previous Local Green Belt Studies

- 5.5.1 Previous local Green Belt studies as detailed below are referenced in section 2.8 of this report and are summarised in Appendix B.
- Strategic Green Belt Review; South West Regional Assembly (SWRA) February 2006.
  - Cheltenham and Gloucester Joint Study Area Green Belt Review: Strategic Re-Assessment of the Green Belt.
  - Cheltenham Green Belt Review; AERC March 2007.
  - Gloucester, Cheltenham and Tewkesbury Urban Extensions Boundary Definition Study, Entec, 2010.

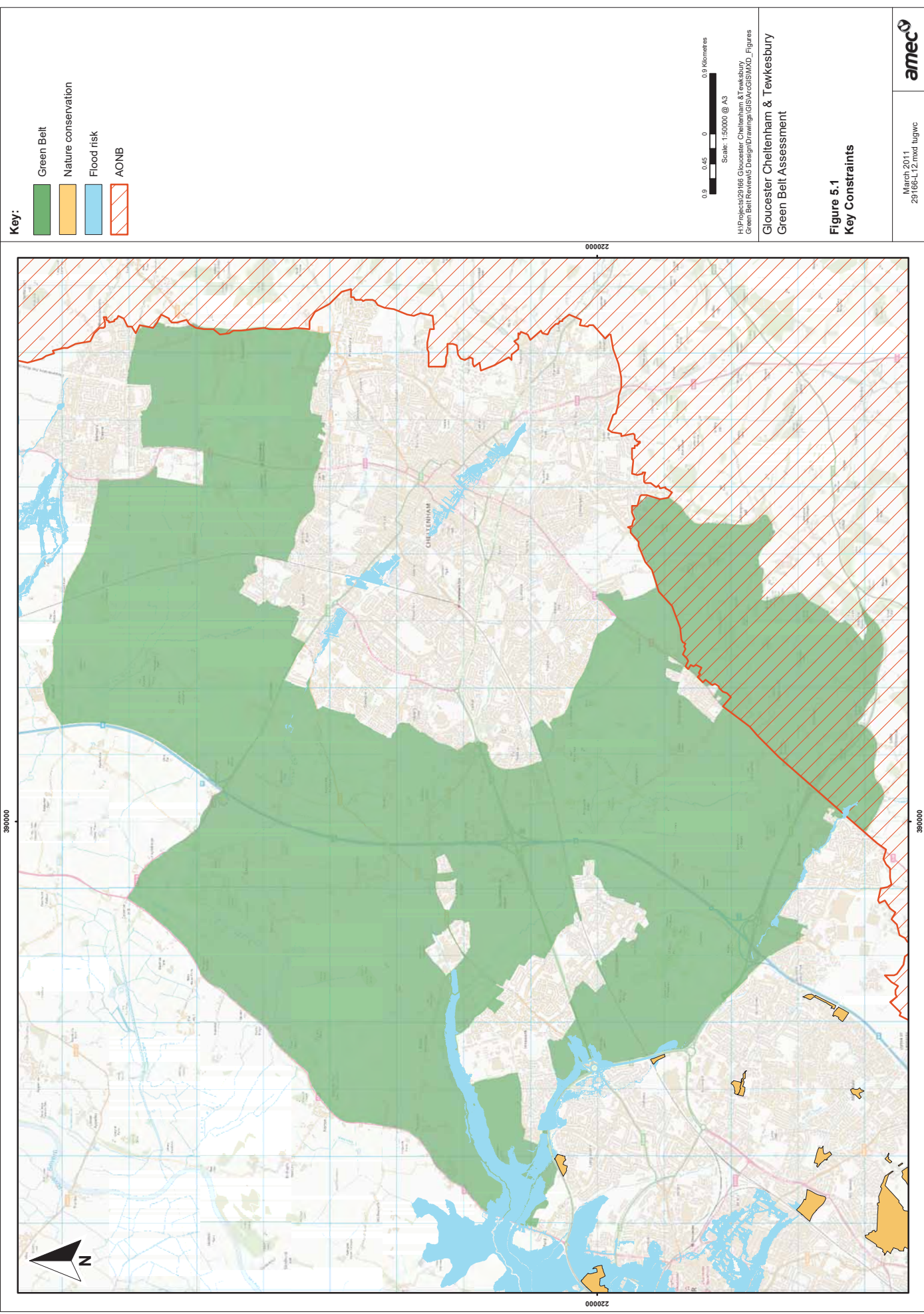


- 5.5.2 The Urban Extensions study only considered those areas of Green Belt that were identified through the Secretary of State's Proposed Changes (the Draft Revised RSS). The aim of the study was to consider the capacity of these areas, the landscape impacts and appropriate long term Green Belt boundaries. This study was not an assessment of all Green Belt land, but was focused on those areas of search identified through the Draft Revised RSS. It is therefore not included in the table in Appendix E of this report which sets out a comparison of the broad findings of the SWRA Strategic Green Belt Review (the results of which are based on the JSA work), the AERC Cheltenham Green Belt Review and this AMEC Strategic Assessment.
- 5.5.3 It should however be noted that direct comparison of the specific results is not possible as the parcels of land considered are not the same in all assessments. The reasons for differences in the results are set out below.
- The AERC study includes a number of elements that are not referenced in PPG2 in relation to the purposes of the Green Belt. The AMEC study is purely based on the five purposes of including land in the Green Belt as set out in PPG2 and does not introduce other elements which are being considered through other evidence base studies.
  - The AERC study considers smaller parcels of land immediately adjoining the urban area within Cheltenham Borough's boundary, whereas the AMEC work considers all of the Green Belt in the JCS area, and thus considers larger parcels in a more strategic approach. This is because until the likely required level of development on Green Belt sites is known, the number and size of sites cannot be established. Once these requirements are known and other elements of the evidence base are complete, further work on the capacity of sites and appropriate Green Belt boundaries can be undertaken. The outer boundary of the AERC parcels is purely based on the Cheltenham Borough boundary, which in some areas are just field boundaries, not boundaries that would be considered to be robust long term Green Belt boundaries. No plans of particular parcels were published with the JSA work.
  - The AERC work involved consultations/workshops with stakeholders to seek their views on the Green Belt. Whilst this may have been appropriate to the remit of the AERC study, this approach would not be consistent with AMEC's independent strategic assessment as stakeholders such as community groups will all have their own particular interests and are often most interested in particular localities rather than having a more independent overview. Stakeholder engagement on matters relating to the Green Belt will be undertaken as part of the Joint Core Strategy consultation, ensuring an opportunity for everyone to comment/respond to the emerging policy.
- 5.5.4 The SWRA Green Belt report concluded that there are two areas of the Green Belt where development would have the least harm, north of Gloucester and land north-west of Cheltenham. These are two of the three areas identified in this AMEC assessment as making a more limited contribution to the Green Belt purposes. The third location identified in this AMEC report as making a more limited contribution to the Green Belt purposes, north of Brockworth was assessed as third least harm by the SWRA report, but scored more highly in the JSA work.
- 5.5.5 Another key difference between results relates to the land between Cheltenham and Bishop's Cleeve. The AMEC assessment and AERC assessments are very similar for this area, treating it as key to the original purpose of designation (as extended in 1981). However, the JSA work did not score this as highly in terms of Green Belt purposes. Other differences in results between the AMEC and AERC

assessments mostly relate to the very different parcel sizes that are considered, as the AERC report only relates to land in Cheltenham Borough making direct comparison difficult.

## 5.6 Summary

- 5.6.1 The assessment has identified seven clusters of segments that make a significant contribution towards Green Belt purposes. There needs to be very careful consideration of other evidence before any of these segments are considered for release from the Green Belt. These segments play a key role in the separation of Cheltenham and Gloucester, and Cheltenham and Bishop's Cleeve, the original purpose of the designation. One cluster of segments was identified as making a contribution towards Green Belt purposes and three clusters of segments were identified as making a limited contribution towards Green Belt purposes. The latter segments could be considered further for release by the JCS authorities should the land be required for development and should it be appropriate in light of the Core Strategy evidence base. These clusters of segments are as follows:
- land to the north, west and east of Brockworth;
  - land to the west of Innsworth, north of Longford and around Twigworth; and
  - land to the west of Kingsditch and Swindon (north-west of Cheltenham).
- 5.6.2 Where there are no obvious robust boundaries, or such boundaries are a considerable distance from the urban edge, it may be necessary to define a new robust Green Belt boundary through masterplanning. This may be the case at north-west Cheltenham or for other areas where development requirements or other elements of the evidence base suggest that there should be consideration of release from the Green Belt but there are no obvious boundaries.
- 5.6.3 As set out in PPG2 and in the Draft National Planning Policy Framework, when defining boundaries as part of a plan review, there is a need to ensure that the boundaries will not need to be altered at the end of the plan period, and therefore that longer term requirements are considered and where necessary safeguarded land identified.
- 5.6.4 With regard to the potential additions to the Green Belt, the case is a limited one, with land immediately to the south of Cheltenham having the strongest case. Any Green Belt extension must be limited to those areas that make a contribution to the five Green Belt purposes and the original purpose of designation, the separation of Cheltenham and Gloucester and Cheltenham and Bishop's Cleeve, as PPG2 does not make any reference to increasing the area of land in the Green Belt solely to compensate for areas of Green Belt released for development. Other planning policies could be used to manage development in those areas where there is particular development pressure.



Key:

- Green Belt
- Nature conservation
- Flood risk
- AONB

Scale: 1:50000 @ A3

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Green Belt Review Design Drawings\GIS\WCS\WCS\_Maps\_Figures

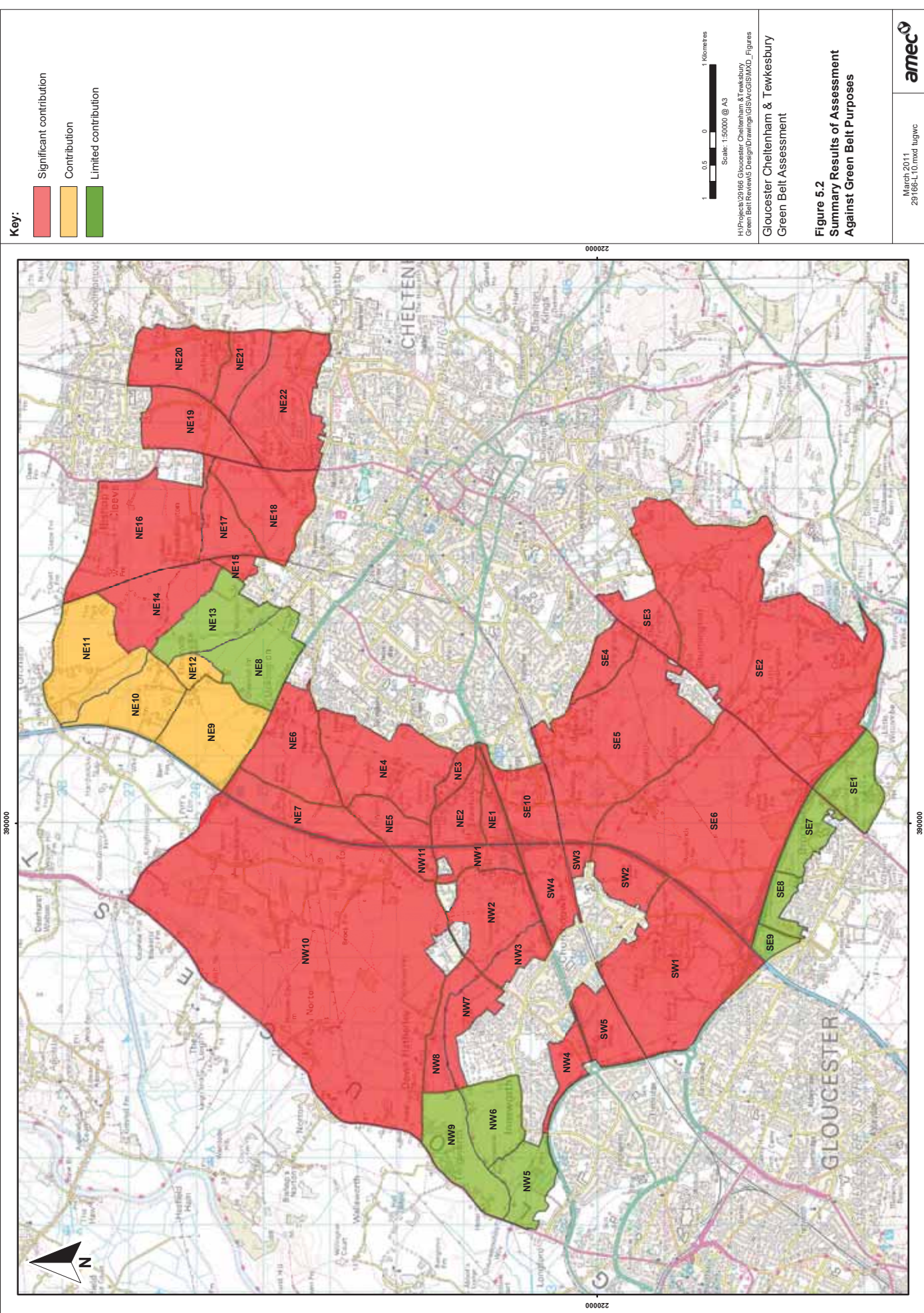
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Green Belt Assessment

Figure 5.1  
Key Constraints

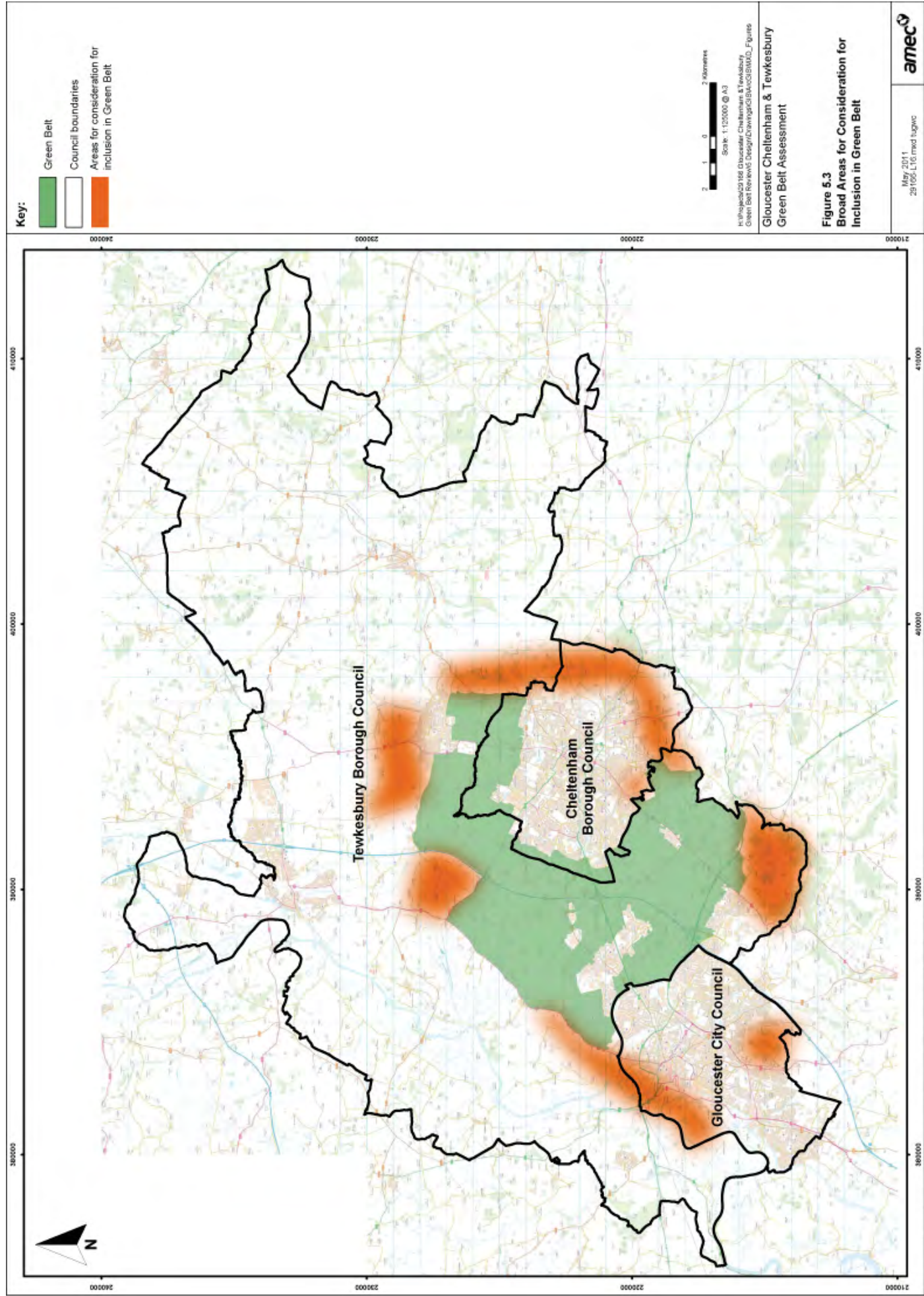
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## 6. Strategic Green Belt Policies

### 6.1 Introduction

- 6.1.1 The study brief requires preparation of a suite of strategic planning policies that will embed the principles of PPG2 in the JCS. Specific policy wording is not suggested at this stage, as this cannot be drafted until there is further certainty regarding Green Belt releases in the short and longer term. These decisions need to be informed by other elements of the evidence base and other strategic considerations. However, this chapter sets out some of the key issues for consideration with regard to strategic Green Belt policies.
- 6.1.2 This chapter also considers examples of Green Belt policies that have recently been adopted and been through examination to help inform future drafting of policies for the JCS. The adopted Green Belt policies from the Cheltenham Borough Local Plan Second Review (Adopted 2006) and the Tewkesbury Borough Local Plan (Adopted 2006) have also been reviewed. Issues and approaches to Green Belt policies are identified and consideration is also given to alternative designation options which may also have a useful role to play in preventing development in certain areas.

### 6.2 Current Practice

- 6.2.1 Separate, detailed policies covering Green Belt issues are relatively uncommon in development plans, and probably more common in the old Local Plans than the emerging Core Strategies. In the latter case, the need to avoid repeating government guidance in local policy appears to be resulting in the use of passing references to Green Belt as part of development management, rather than a specific policy. Nevertheless, where authorities are particularly concerned about development pressure, then specific policies have been included in adopted Core Strategies. Three examples of policy have been identified: a general approach, a more specific approach and a very general protection policy. These policies are presented in full at Appendix F.
- 6.2.2 The relatively detailed policies are those of Tandridge (centred on Caterham/Oxted, Surrey) and Tunbridge Wells (Kent), both of which have opted for a Strategic Policy. Tandridge District is around 94% Green Belt and Tunbridge Wells is around 22% Green Belt. The content of the fuller policies of Tandridge and Tunbridge Wells centres on:
- confirmation that there will be no change in Green Belt boundaries, with the proviso that sufficient development land can be found in the built-up areas;
  - where changes are proposed, sustainable locations will be preferred, having regard to the need to prevent coalescence;
  - dispersal of the impact of any greenfield land release through allocation of a number of sites;
  - maintenance of a long-term land reserve through safeguarded land to ensure that Green Belt boundaries do not have to be altered over the plan period (although this could be identified in a Site Allocations DPD);

- a general presumption against development that would not preserve openness; and
- infilling of major developed sites in the Green Belt.

6.2.3 In both cases, the approaches used are arguably more strategic in nature, allowing for the pragmatic release of Green Belt land. By contrast, Chelmsford's approach simply states that the Green Belt will be protected and development steered to the major settlements, the implication being that sufficient land for development is available in these areas.

## 6.3 Key Considerations for JCS Strategic Green Belt Policy

6.3.1 The style and content of a Green Belt policy for the Joint Core Strategy (if indeed it is considered that a separate policy is required), will be dependent upon a variety of factors. A number of issues for consideration for inclusion in Green Belt policy are set out below:

- the scale of revisions to Green Belt boundaries in light of development pressure;
- the likely need for safeguarded land or a long-term land reserve to meet future needs and to prevent further alterations to the Green Belt when the JCS is next reviewed;
- the need to re-affirm the purposes of the original Green Belt designation;
- the need for robust long term Green Belt boundaries;
- the need to set out principles for development in the Green Belt; and
- the suitability of any sites for designation as major developed sites in the Green Belt.

6.3.2 Given the very tight Green Belt boundary around the urban area, identifying safeguarded land/reserve sites is likely to be key so that Green Belt boundaries do not have to be altered at the next plan review and to ensure that sustainable patterns of development are promoted. Such sites should be capable of development when needed, but any policy will need to ensure their protection until they are required for development.

6.3.3 In addition to re-affirming the overall purposes of the Green Belt, other issues for consideration in policy include setting out the type of land uses that are and are not likely to be appropriate in the Green Belt. In the case of inappropriate development, in accordance with PPG2, the need for applicants to demonstrate very special circumstances to justify why the harm is outweighed by other considerations could be stressed. However, this should not simply repeat PPG2.

6.3.4 There are a number of settlements in the JCS area that are inset to the Green Belt. A key consideration will be whether or not there are any areas that should be identified as major developed sites in the Green Belt. Gloucestershire Airport is located in the Green Belt, although currently policies CH1 and CH2 of the Tewkesbury Borough Local Plan saved policies allow for infilling in a small part of the airport for essential airport related uses. Consideration could be given to the appropriateness of identifying part of the airport site as a major developed site in the Green Belt. This will very much depend on any growth plans for the airport and its role in the local economy. Elsewhere in the country, airports that have been

removed from the Green Belt tend to be those that are identified for significant passenger growth or which have a significant impact on the economy which may not be as relevant to Gloucestershire Airport. The fact that the Airport is located in the narrowest part of the gap between Gloucester and Cheltenham should also be a consideration.

- 6.3.5 Cheltenham Racecourse is another example of a site where the Cheltenham Borough Local Plan Second Review policy permits development that is horse racing related within the existing built up part of the site, as identified on the proposals map. Consideration could be given to identifying part of the site as a major developed site in the Green Belt, although this would not significantly alter the policy that applies to the site at present. Another issue for consideration is that the racecourse is located within the narrow gap between Cheltenham and Bishop's Cleeve.
- 6.3.6 Limited infilling (in accordance with Annex C of PPG2) would be permitted at sites identified as major developed sites. The JCS team may consider it appropriate to be proactively involved in working up development briefs/masterplans for any such sites to ensure that their impact is appropriate to their location in the Green Belt.
- 6.3.7 A single Green Belt policy could incorporate the following:
- clarity on maintenance and protection of the Green Belt as shown on the Proposals Map;
  - protection of safeguarded/long term reserves (as shown on the Proposals Map) until such time as they are required for development;
  - presumption against inappropriate development (without simply repeating national policy) with particular reference to the key reasons for designation; and
  - site specific policy relating to areas such as the airport, racecourse and settlements in the Green Belt where limited expansion may be permitted.
- 6.3.8 Such a policy should not repeat national policy as set out in PPG2. The Government intends to produce a single national planning policy which is likely to incorporate national Green Belt policy and replace PPG2. The content of this may influence the wording of the JCS policy, particularly if less detailed guidance that currently provided in PPG2 is set out.





## 7. Summary and Recommendations

### 7.1 Background and Policy Context

- 7.1.1 This Green Belt Assessment was commissioned by Cheltenham Borough Council on behalf of Cheltenham Borough Council, Tewkesbury Borough Council and Gloucester City Council. The three authorities are working together to produce a Joint Core Strategy. This Green Belt assessment forms part of the LDF evidence base and should not be viewed in isolation, but in the context of the entire evidence base. The recommendations need to be considered again once the scale of development is known and once good urban design and sustainability issues have been considered.
- 7.1.2 The brief was to undertake a qualitative Green Belt assessment specifically focussing on an assessment against the five purposes of including land in Green Belts as set out in Planning Policy Guidance 2: *Green Belts* (1995).
- 7.1.3 In May 2010, the Coalition Government revoked Regional Spatial Strategies and set out a clear commitment to abolish them through the Localism Bill. Following a legal challenge, RSSs have since been re-instated. However, they will be revoked once the Localism Bill comes into effect, likely to be by April 2012. Prior to these events, the Draft Revised RSS for the South West identified a level of growth for the Gloucester and Cheltenham Housing Market Area (HMA) between 2006 and 2026. The Draft also identified five broad Areas of Search that were identified to meet the growth needs of Gloucester and Cheltenham, although they included areas in Tewkesbury Borough. Four of these areas were in the Green Belt.
- 7.1.4 The JCS authorities are now reviewing their development requirements locally as part of the evidence base for the JCS, with this work being led by Gloucestershire County Council. This will be a key factor in determining which, if any sites should be released from the Green Belt for development.
- 7.1.5 The study provides an objective and independent review of Green Belt boundaries to facilitate clear decision making and option testing once other evidence is available to the JCS Team.

### 7.2 Assessment Methodology

- 7.2.1 The assessment methodology has been developed in response to Green Belt reviews and local Green Belt studies that have been undertaken. A summary of the approach to this study is set out below:
- Mapping exercise to identify key constraints.
  - Identification of strategic Green Belt segments using OS maps, aerial photos and site visits, with strong boundaries being used to define boundaries of the segments.
  - Assessment of each segment against each of the five purposes of including land in the Green Belt as set out in PPG2, paragraph 1.5 (four purposes were actually assessed as the fifth purpose could apply equally to all sites so was scoped out). The results of this were recorded using a matrix and a simple traffic light system. An overall traffic light score was then arrived at for each segment and mapped.

- The results of the above were summarised through segments being grouped into clusters and recommendations were made for each cluster of segments. Where recommendations are made that particular segments/clusters of segments require further consideration, this does not mean that they should be released from the Green Belt, but that they could be considered further depending on development requirements and the findings of other evidence base studies.
- Consideration was given to possible areas for inclusion in the Green Belt and these areas were assessed against the five purposes of including land in Green Belt.

## 7.3 Summary of Assessment Results and Recommendations

7.3.1 The assessment has identified seven clusters of segments that make a significant contribution towards Green Belt purposes and which should not be considered further for release from the Green Belt unless there is a very strong case emerging from other evidence base studies. These segments are:

- land between Bishop's Cleeve and Cheltenham;
- land between Cheltenham and Gloucester to the east of the M5;
- land between Gloucester and Churchdown to the west of the M5;
- land between Cheltenham and the M5 north of the A40;
- land to the west of the M5, north of the A40 and north and south-west of Churchdown;
- land to the north of Innsworth; and
- land to the west of the M5 and north of the B4063.

7.3.2 The recommendations in relation to these clusters of Green Belt segments that make a significant contribution to the Green Belt are summarised in Table 7.1. These clusters do not merit further consideration for potential release from the Green Belt unless there is a strong case emerging from other evidence base studies.

**Table 7.1 Recommendations for Clusters that make a Significant Contribution towards Green Belt Purposes**

Cluster of Green Belt Segments	Recommendation
Land between Bishop's Cleeve and Cheltenham NE14, NE15, NE16, NE17, NE18, NE19, NE20, NE21, NE22	Maintenance of the separation between Cheltenham and Bishop's Cleeve is critical to fulfilling the purpose of Green Belt designation (as extended in 1981).
Land between Cheltenham and Gloucester to the east of the M5 SE2, SE3, SE4, SE5, SE6, SE10	This area is critical to the separation of Cheltenham and Gloucester, being the original purpose of Green Belt designation. Re-definition of the inner boundaries of segment SE3 could be required, perhaps along Field Lane, to provide a firmer long-term boundary.
Land between Gloucester and Churchdown to the west of the M5 SW1, SW2, SW3, SW4, SW5, NW4	This area is critical to the separation of Cheltenham and Gloucester, being the original purpose of designation.
Land between Cheltenham and the M5 north of the A40 NE1, NE2, NE3, NE4, NE5, NE6, NE7	This area is critical to preventing the sprawl of Cheltenham and towards the south, the merger of Cheltenham and Churchdown.
Land to the west of the M5, north of the A40, and north and south-west of Churchdown NW1, NW2, NW3	This is critical to preventing the closing of the gap between Cheltenham and Churchdown, being already heavily intruded towards its southern extent with Airport related uses.
Land to the north of Innsworth NW7, NW8	This is critical to preventing the closing of the gap between Cheltenham and Churchdown, particularly towards the east of these segments.
Land to the west of the M5 and north of the B4063 NW10, NW11	This forms the bulk of the extent of the Green Belt in this north-western quarter, with the separation function stronger towards the south and eastern area of the segments.

7.3.3 One cluster of segments was identified as making a contribution towards Green Belt purposes as follows:

- land north-west of Cheltenham.

7.3.4 The recommendation in relation to this cluster that makes a contribution towards Green Belt purposes is summarised in Table 7.2.

**Table 7.2 Recommendations for Cluster that makes a Contribution towards Green Belt Purposes**

Cluster of Green Belt Segments	Recommendation
Land north-west of Cheltenham NE9, NE10, NE11, NE12	Overall, these segments make a contribution to Green Belt purposes by virtue of providing the wider setting for Cheltenham and Bishop's Cleeve, but they are not critical to the Green Belt and play a more limited role in separation of the settlements. These segments play a role in preventing encroachment, as there are some strong boundary options, but they are divorced from the urban edge. They play a role in preventing ribbon development in some areas. If land was removed from the Green Belt in adjoining segments NE8 or NE13, then segments NE9, NE10, NE11 and NE12 would still make a contribution towards the Green Belt, although it may be a more limited contribution, particularly if any development in NE8 or NE13 creates a robust new Green Belt boundary.



7.3.5 Three clusters of segments were identified as making a limited contribution to Green Belt purposes, and which could be considered further for release by the JCS authorities should the land be required for development and should it be appropriate in light of the Core Strategy evidence base. These clusters of segments are as follows:

- land to the north, east and west of Brockworth;
- land to the west of Innsworth, north of Longford and around Twigworth; and
- land to the west of Kingsditch and Swindon.

7.3.6 The recommendations in relation to these clusters that make a contribution towards Green Belt purposes are summarised in Table 7.3.

**Table 7.3 Recommendations for Clusters that make a Limited Contribution towards Green Belt Purposes**

Cluster of Green Belt Segments	Recommendation
Land to the north, east and west of Brockworth SE1, SE7, SE8, SE9,	Intrusion of urban uses (particularly towards the east) compromises its sense of openness. Severance from the main Green Belt tract to the north by the A417 further compromises its function, meaning that there could be opportunities for re-examining its designation and boundaries as the A417 would be a strong long term boundary to prevent encroachment. Due to their enclosure on all sides by major roads, these segments serve little or no Green Belt function.
Land to the west of Innsworth, north of Longford and around Twigworth NW5, NW6, NW9	The openness of this tract is compromised by intrusive development throughout its extent. Combined with limited function in preventing the merger of towns, there is a case for re-examining its boundaries, particularly in relation to Innsworth, where existing boundary features could be readily used to create new long-term boundaries.
Land to the west of Kingsditch and Swindon NE8, NE13	<p>Whilst containing Cheltenham on its north-western boundary, extensive ribbon development along the north side of the A4019 severely limits the sense of openness of the southern portion (as viewed from this corridor) and compromises its overall function. Segments NE8 and NE13 are of a similar character, separated only by the reasonably strong boundary feature of Dog Bark Lane. Towards their western reaches, both segments increasingly share characteristics and functions of the outer segments of the Green Belt. These segments make a very limited contribution towards the separation of Cheltenham and Gloucester and Cheltenham and Bishop's Cleeve.</p> <p>As it is more difficult to identify clear Green Belt boundaries within these segments, any development within the segments or parts of the segments would require strong Green Belt boundaries to be created through good masterplanning.</p>

7.3.7 On the basis of the above recommendations, this study has demonstrated that there are areas of Green Belt that merit further consideration for possible removal from the Green Belt, should Green Belt land be required now or in the long term, and should it be appropriate in light of the findings of the other elements of the LDF evidence base, in particular those relating to development levels and sustainable patterns of development and landscape. Consideration should be given to the allocation of safeguarded land to prevent the need for further Green Belt review at the end of the plan period.

- 7.3.8 With regard to possible additions to the Green Belt, of the seven broad areas that were assessed, the land south of Leckhampton (south-west of Farm Lane) has potential to be added. National Policy, in the form of PPG2 does not make any reference to designating 'compensatory' Green Belt land and therefore any additions need to meet the purposes of including land in Green Belts and particularly the purpose of separation between Cheltenham and Gloucester. Apart from land south-west of Farm Lane, none of the other areas considered play a role in the separation of Cheltenham and Gloucester. The JCS team should give consideration to other policies that can be used to prevent development, such as areas of restraint policies, open countryside policies, and limiting opportunities through careful designation of settlement boundaries.
- 7.3.9 Issues for consideration of draft policy wording have been set out, to be taken further once there is clarity on the agreed way forward with regard to Green Belt policy in the JCS and once other aims and strategies have been progressed. This has been informed by review of current practice in Green Belt policy, i.e. policies that have been tested at Examination and adopted as policy, and by a review of current Local Plan policies covering the JCS area.



## Appendix A

# SW RSS: Panel Comments on Green Belt Areas of Search

### East of Gloucester/Brockworth

With regard to the additional Area of Search at East Gloucester/Brockworth, paragraph 4.3.28 of the Panel Report states that:

*“The Panel considers that land within this area [south of A417, west of A46] could be developed without compromising the purposes of the wider Green Belt hereabouts inasmuch as sprawl, merging and encroachment into the countryside would all be held in check by the bordering road network, and in its present undeveloped state it makes no positive contribution to the setting or character of the city or to urban regeneration.”*

### Gloucester North

The Panel notes that this Area of Search is supported by the South West Draft RSS Urban Extension Evidence Base Review. Paragraph 4.3.29 of the Panel Report states that:

*“The Regional Flood Risk Appraisal bears on part of this. Nonetheless, the Panel observes that there is scope to extend northwards onto higher land further from the flood risk area without impinging on Green Belt purposes, not least because planned outward growth of the urban area would not amount to unrestricted urban sprawl... planned development in this sector would not impinge on the gap between Gloucester and Cheltenham, give rise to any material impact on the setting or character of either settlement, or undermine the wider purposes of the Green Belt hereabouts.”*



## Cheltenham South

The Panel Report states at paragraph 4.3.30 that:

*“Some participants have advocated ribbon development along the A40... It is the Panel’s view that the Green Belt continues to serve a useful purpose here in preventing the two settlements from merging and thus protecting their distinct identities. We do not therefore support any significant encroachment into Green Belt between the two settlements here or elsewhere. There are, nonetheless, some small areas of land around the southern edge of Cheltenham that do not lie within the Green Belt and which have long been the subject of dispute over development potential. Land at Leckhampton/Shurdington is the largest of these.”*

The Panel Report goes on to note that the Cheltenham Green Belt Review considered that the land at Leckhampton/Shurdington did not warrant Green Belt designation, and the Panel agreed with these findings.

## Cheltenham North

The Panel accepts that it should be possible to find scope for some additional dwellings at this Areas of Search without undermining Green Belt purposes. It did however note that any significant eastward extension should be avoided in order to protect the separate identities of Cheltenham and Bishop’s Cleeve.

## Bishop’s Cleeve

The Panel concluded that development to the south of Bishop’s Cleeve would diminish the separation from Cheltenham which would be objectionable for the same reasons as land close to Cheltenham racecourse. It goes on to note that land to the north of the settlement is unconstrained by existing Green Belt, and in the Panel’s view this area provides ample opportunity for sustainable strategic future outward growth of the settlement.

## General Green Belt Issues

The Panel rejected the Draft RSS proposed addition to the Green Belt north of Bishop’s Cleeve and to the south of Gloucester due to the fact that sprawl is restricted by the floodplain and the Cotswold Area of Outstanding Natural Beauty (AONB) in these locations. The Panel noted that the fact that the existing Green Belt does not completely surround either settlement seems to recognise its main original purpose, which was to maintain the separation between Gloucester and Cheltenham. It is also noted that in practice, unrestricted sprawl and countryside encroachment here are limited by the combined presence of the flood plain and the Cotswold’s AONB. The Panel



goes on to state that it sees no justification in PPG2 for increasing the extent of the Green Belt solely to compensate for losses arising from the urban extensions/Areas of Search that are recommended.



## Appendix B

# Local Green Belt Studies

### Strategic Green Belt Review, Colin Buchanan Associates, SWRA (2006)

This strategic review of Green Belts in the South West was undertaken to inform preparation of the RSS for the South West, and in light of the requirement in RPG10 to critically review the Green Belt to examine whether boundary alterations were needed to allow for long term sustainable development needs. The aim was to undertake an assessment of the technical work already carried out in the area and to make recommendations for a methodology that could be used by authorities when undertaking Green Belt Assessments in the region.

The study reviewed the methodologies of the Green Belt reviews undertaken in the South West and concluded that certain aspects of the methodology are common to all reviews, although it did note that in many cases objectivity in development and using the analysis was lost by the arbitrary and apparently inconsistent application of local knowledge (good, excellent or otherwise).

With regard to the Cheltenham and Gloucester work, the study noted that a sound approach was used, although more explanation was required. It also notes that there were areas of Green Belt that were not assessed or considered for release. The lack of transparency of the scoring system was identified as a weakness.

The study concludes that across the region, there are limited numbers of locations where urban expansion could be achieved without significantly and adversely affecting the purpose of the Green Belts. It concludes that an assessment of the Green Belt based on an understanding of their original purposes has not been undertaken. With regard to the time horizon of the Green Belt reviews, it is noted that as their areas of search were limited, the reviews will probably not be able to provide for the time period beyond the time horizon of the RSS. The study notes that for the reviews to have had a longer timescale they would need to have considered more sustainable strategic options.

The study noted that the following areas of work still needed to be undertaken: document review, definition of purpose, establishment of sustainability criteria and search area database, and application of criteria to search area database.

The aim of the study was not to identify precise locations for Green Belt review, but to identify the general extent of Green Belt in the region and to identify where the rationale for inclusion in Green Belt is relatively weak and where it is stronger. The report notes that for Cheltenham and Gloucester, the locations where harm caused to Green Belt appears to be least, based on available information and discussions with JSA authorities are North Gloucester and North West Cheltenham.



## Cheltenham and Gloucester Joint Study Area: Strategic Re-assessment of the Green Belt

A Green Belt Officer Working Group was established, and in the context of RPG10's requirement to consider how best to meet longer term development needs in the area, it considered the purposes for Green Belt designation in Gloucester/Cheltenham. It also undertook site visits in the area in order to establish the appropriateness for Green Belt designation in different areas on the edge of the settlements. This was a broad assessment of the Green Belt to enable strategic options for future directions for development to be consulted upon. It did not look at defining boundaries or the issue of phasing.

With regard to the purposes of the Green Belt, the Group's findings are summarised below.

### *To check the unrestricted sprawl of large built-up areas*

The Group considered that in the era of plan-led development, the type of unplanned sprawl that this purpose was originally aimed at preventing should not occur. It was considered that preventing development in areas that cannot be easily linked to existing town centres by public transport could fall into this category.

### *To prevent neighbouring towns from merging into one another*

The Group considered that this was not so much about loss of character, but more about visual separation.

### *To assist in safeguarding the countryside from encroachment*

The Group considered that a properly plan-led approach to development should minimise the spread of development and minimise the intrusion of the urban form on the rural areas around the PUAs. The Group noted that although landscape quality is not a relevant consideration in the designation of Green Belts, certain key landscape features could be considered for inclusions as they provide a backcloth to views across the Severn Vale that are fundamental to the appreciation of the open countryside.

### *To preserve the setting and special character of historic towns*

The Group considered this to be clear and easily understood and that it is particularly relevant where there are cherished views of historic areas/features set beyond a rural foreground.

### *To assist in urban regeneration by encouraging the recycling of derelict and other urban land*

This was considered to be relevant insofar as, within a long term plan, there needs to be robust phasing and priorities set to ensure that recycling of land within the PUAs is fully exploited. The Group noted the importance of phasing of safeguarded land to encourage recycling of previously developed land.

The Group assessed broad sectors of the urban edge in terms of its value in respect of the five purposes of including land in the Green Belt. Scores of '0' (little or no importance), '1' (some importance) and '2' (high importance) were used. The result was that the Working Group considered that there is scope to remove land north of

Gloucester and north-west of Cheltenham without affecting, in any meaningful way, the sense of visual separation between Gloucester and Cheltenham, and between Cheltenham and Bishop's Cleeve.

The Group also concluded that some additional areas could be added to the Green Belt, including the Cotswold escarpment along the eastern edge of Cheltenham and Gloucester (to give extra protection to their open countryside character), along the western edge of Gloucester (to safeguard the historic setting of central Gloucester), to the south of Gloucester and to the north of Bishop's Cleeve (to prevent development sprawling into countryside areas that are poorly related to the centres of the PUAs).

### Cheltenham Green Belt Review, AERC, March 2007

The purpose of this review was to assist Cheltenham Borough Council in re-designating areas of Green Belt. The methodology comprised an initial identification of sub areas for assessment across the existing Green Belt and between the Green Belt and the built-up area. A wider study area was also identified including land in Tewkesbury Borough across which the implications of the study would be considered.

The assessment approach utilised a scoring system comprising a set of defined measurable criteria relating to each Green Belt purpose (for example, distance from the built-up area, nature conservation value and agricultural land quality). Once each score was determined, a ranking multiplier was added to derive an overall score enabling each sub-area to be classified as either 'high', 'average' or 'low' in relation to the extent to which they met the purposes of including land in Green Belts.

To support the sub-area analysis, an assessment of development constraints in relation to Green Belt boundaries was undertaken. This focused on mapping 'hard' constraints (i.e. those constraints which preclude development) and 'soft' constraints (i.e. those constraints which may act as a barrier to development but which are not insurmountable) to assist in the identification of the most suitable development location. Finally, the Review undertook an analysis of the existing Green Belt boundary in terms of its defensibility, identifying 'strong' and 'weak' sections to highlight those areas in need of strengthening and to identify new potential Green Belt boundaries.

The Cheltenham Green Belt Review drew upon the earlier Joint Green Belt Study, and the SWRA Strategic Green Belt Review. The ranking of the Green Belt purposes used in the assessment reflected the key purposes which were to prevent towns merging and to check urban sprawl. The results of the objective scoring process showed that the area between Cheltenham and Bishop's Cleeve has the greatest role in supporting the objectives of the Green Belt, whilst the areas to the north-west and west of Cheltenham scored lowest in relation to these objectives. The study found that much of Cheltenham's inner Green Belt boundary is likely to be defensible in the foreseeable future due to either its long establishment or its strong boundary features. It was concluded that the non-Green Belt land included in the detailed Study Area between the Green Belt and the built-up area, did not achieve high scores and would not make a major positive contribution to Green Belt purposes with the exception of a sub-area to the south-east of Swindon village.

The study noted that there were limited opportunities to provide suitable 'compensatory' Green Belt in Cheltenham to replace land lost to development within the Green Belt, as many of the potential sites would fall within Tewkesbury or Gloucester. The study was unable to identify alternative defensible boundaries to those already in existence, or even alternatives more defensible than the weaker existing Green Belt boundaries in the Borough.

The study notes the need for future changes to the Green Belt to take into account important constraints to new development, the AONB and areas at risk from flooding. It advises that where weak Green Belt boundaries exist, these should be strengthened through the LDF, either as part of the process of defining new land allocations or through land management in consultation with landowners.

## Appendix C

# Review of Green Belt Studies

### Cheltenham and Gloucester Joint Study Area Green Belt Review

A Joint Study Area Steering Group established a separate Green Belt Working Group, which was tasked with examining the purpose of the Gloucester/Cheltenham Green Belt. The effectiveness of the Green belt was assessed by the Group in relation to the five purposes of the Green Belt identified within PPG2. The main purposes identified included:

- preventing towns from merging;
- safeguarding the countryside; and
- encouraging recycling of land.

Various areas of the Green Belt were scored in order to demonstrate their value in relation to these objectives. It was noted that the north-west of Cheltenham scored poorly. The study also demonstrated that an area within the Cotswold Escarpment, to the eastern edge of Cheltenham, could provide a valuable addition to the Green Belt.

### Cheltenham Green Belt Review

The Cheltenham Green Belt Review was undertaken in March 2007 and seeks to assist Cheltenham Borough Council in re-designating areas of Green Belt. The methodology comprised an initial identification of sub areas for assessment across the existing Green Belt and between the Green Belt and the built-up area. A wider Study Area was also identified including land in Tewkesbury Borough across which the implications of the study would be considered.

The assessment approach utilised a scoring system comprising a set of defined measurable criteria relating to each Green Belt purpose (for example, distance from the built-up area, nature conservation value and agricultural land quality). Once each score was determined, a ranking multiplier was added to derive an overall score enabling each sub-area to be classified as either 'high', 'average' or 'low' in relation to the extent to which they met the purposes of Green Belts. To support the sub-area analysis, an assessment of development constraints in relation to Green Belt boundaries was undertaken. This focused on mapping 'hard' constraints (i.e. those constraints which preclude development) and 'soft' constraints (i.e. those constraints which may act as a barrier to development but which are not insurmountable) to assist in the identification of the most suitable development location. Finally, the Review undertook an analysis of the existing Green Belt boundary in terms of its defensibility, identifying 'strong' and 'weak' sections (see Table B1) to highlight those areas in need of strengthening and to identify new potential Green Belt boundaries.



**Table B1      Defensible Boundary Classification**

Strong	Weak
<ul style="list-style-type: none"> <li>▪ Motorways</li> <li>▪ Mainline (in use) railway line</li> <li>▪ District Distributor Roads forming boundary (not bisecting Green Belt)</li> <li>▪ Rivers, watercourses and significant drainage features</li> <li>▪ Prominent physical features (i.e. ridgeline, non-intermittent waterways)</li> <li>▪ Protected hedgerows/woodlands</li> <li>▪ Residential development with strong rear boundaries</li> <li>▪ Other development with strong established boundaries</li> </ul>	<ul style="list-style-type: none"> <li>▪ Non-residential development with weak or indeterminate boundaries</li> <li>▪ Residential curtilages</li> <li>▪ Tree-lined public footpaths</li> <li>▪ Other classified roads</li> <li>▪ Disused railway lines</li> <li>▪ Non protected hedgerows/woodlands</li> <li>▪ Power lines</li> <li>▪ Rights of Way</li> <li>▪ Private/unmade roads</li> <li>▪ Recreational field boundaries</li> <li>▪ Park boundaries</li> </ul>

Source: The Cheltenham Green Belt Review (Cheltenham Borough Council 2007:43)

A review of Cheltenham's Green Belt has previously been completed. This review assesses the Green Belt around Cheltenham by using various sub areas and scoring the use/purpose of the Green Belt in these sub areas using a traffic light system. The methodology includes assessing:

- flood risk data;
- sustainability criteria;
- considering areas with cross boundary potential;
- identifying strong and weak Green Belt boundaries across the area; and
- mapping this information on various GIS layers.

The Cheltenham Green Belt Study is one of a number of studies providing data to support the preparation of the Cheltenham Local Development Framework, which will address the need to accommodate sustainable new development. Cheltenham Borough boundary is very tightly drawn around the town and no locations have been identified which provide the minimum depth of countryside normally required to meet the requirements of a functional Green Belt. To this extent the Cheltenham Green Belt is dependent upon adjoining areas within Tewkesbury Borough and Cotswold District Council to meet those requirements. The Cheltenham Green Belt Review has drawn upon the earlier Joint Green Belt Study of the Gloucester and Cheltenham Green Belt, and an independent review of other Sub-Regional Green Belt studies in the South West Region, as well as the Draft Revised RSS proposals.

The Study concludes that of the four existing Green Belt policies within the Local Plan, three policies, CO48, CO50 and CO51, contribute positively to Green Belt purposes, pass the relevant 'Tests of Soundness' required by Planning Policy Guidance 12, and are 'fit for purpose' for inclusion in the emerging Local Development

Framework. The fourth Green Belt policy, policy CO49, is capable of contributing to Green Belt purposes and being 'sound' if minor amendments are made to it. One non-Green Belt policy in the Local Plan, policy TO113 relating to Cheltenham Racecourse, could also contribute to Green Belt purposes. The review concludes that a number of the sub areas (15) contribute significantly more to achieving Green Belt purposes than the others (63).

The ranking of the purposes used in the assessment reflect the views of stakeholders that the most important Green Belt purposes in Cheltenham are preventing towns merging, particularly Cheltenham and Gloucester, and Cheltenham and Bishop's Cleeve, and checking urban sprawl. The results of the objective scoring process showed that the area between Cheltenham and Bishop's Cleeve has the greatest role in supporting the objectives of the Green Belt, whilst sub areas to the north-west and west of Cheltenham scored lowest in relation to these objectives. The Study found that much of Cheltenham's inner Green Belt boundary is likely to be defensible in the foreseeable future due to either its long establishment or its strong boundary features. It was concluded that the non-Green Belt land included in the detailed Study Area between the Green Belt and the built-up area, did not achieve high scores and would not make a major positive contribution to Green Belt purposes with the exception of a sub-area to the south-east of Swindon Village.

There are limited opportunities therefore to provide suitable 'compensatory' Green Belt, to replace land lost to development, within Cheltenham Borough and other sites may be sought in collaboration with the neighbouring authorities of Tewkesbury and Gloucester. The Study was unable to identify alternative defensible boundaries to those already in existence, or even alternatives more defensible than the weaker existing Green Belt boundaries in the Borough.

Future changes to the Green Belt will need to take account of important constraints to new development, the AONB and areas at risk from flooding. The Plan identifies areas to the peripheral west and north-west of the Borough for possible sustainable development, however these areas do not coincide with neighbourhoods free from major constraints or with areas making least contribution to Green Belt purposes, apart from the area to the north-west of Swindon Village.

Where weak Green Belt boundaries exist, these should be strengthened through the LDF, either as part of the process of defining new land allocations or through land management in consultation with landowners. The emerging Local Development Framework will be required to develop masterplans which are able to defend the boundaries of the Green Belt, whilst accommodating future sustainable development to satisfy Sub-Regional development requirements.

## Nottingham/Derby

The Nottingham-Derby Green Belt Review was published in 2006 and adopted a more qualitative based approach to scoring sub-areas, including potential extensions. This focused predominantly on the extent to which each met the five purposes of Green Belts but also included an assessment of the importance of each area in providing green infrastructure. Nevertheless, the outcome of the approach was broadly similar to that of the Cheltenham Green Belt

Review with each area scored and classified (high, medium and low) in relation to the extent to which it met the purposes of the Green Belts.

## Coventry

The Coventry Green Belt Review, completed in December 2007, combined Green Belt and sustainability criteria relating to nature conservation value, flood risk, transport and accessibility (see Box 1). The assessment sought to determine whether any Green Belt land within Coventry's boundaries could make a significant contribution to meeting long term development land supply needs and focused on two areas of search for expansion of the urban area, identifying those parts suitable for removal from the Green Belt (see Figure B.1).

Box 1	Coventry Green Belt Review: Criteria for assessment
<p>Areas of land for release from Green Belt designation will only be recommended if built development on them would result in only modest visual impact on the open character of the Green Belt in the surrounding area. Modest visual impact is defined here as not giving the appearance of urban sprawl, reducing important gaps between urban areas and encroachment of the open countryside, thereby addressing purposes 1,2 and 3 of Green Belt in PPG2.</p> <p>Release of designated Green Belt would not significantly harm or detract from views of the city centre or nearby historic towns. (PPG2 purpose 4.)</p> <p>In green wedge areas of Green Belt the release of land for built development will only be recommended if the linear cohesion and openness of that green wedge is not significantly damaged.</p> <p>The addition of designated Green Belt land (including in green wedges) will be recommended only if it would significantly enhance the purposes, character or cohesion of the Green Belt.</p> <p>The release of designated Green Belt land would not damage areas of significant nature conservation value (i.e. Site of Importance for Nature Conservation [SINC] or higher).</p> <p>The release of designated Green Belt land is not in a defined floodplain (see Map 2).</p> <p>Land proposed for release from the Green Belt must be capable of being developed in a sustainable way by being readily integrated with the existing built-up area so that existing and extended key services and facilities (including public transport, walking/cycling routes and social/community/leisure facilities) are easily accessed. Boxes are for emphasis and are designed to contrast with the main text, e.g. for a case study or abstract.</p>	

## Purbeck

This study built upon the work of the South East Dorset Joint Study Area sub-regional Green Belt Review, undertaking a more localised and detailed review around the urban fringes of the District's main settlements and the outer boundaries of the Green Belt. The assessment utilized aerial photography together with the analysis of photographs taken from site visits to determine the extent to which each sub-area met the purposes Green Belts. The results were presented using a traffic light-based system to identify potential areas for further review.



## **Appendix D**

### **Matrix of Green Belt Assessment Results**





### Assessment of Segments against Five Purposes of Green Belts

Strategic Segment	Key Constraints	1. Check the unrestricted sprawl of large built-up areas	2. Prevent nearby towns from merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns	Overall Evaluation (existing land use; proximity and relationship to the built-up area; degree of enclosure/openness; distance and visual connection to historic urban centres/key urban areas; relationship to the countryside)	Contribution to Green Belt Purposes: Overall Traffic Light Assessment
SE1 - land to the south of the A417 and east of the A46.	(AONB)	Contribution - helps check sprawl eastward from Brockworth along A46 and ribbon development along Cirencester Road.	Limited contribution - forms eastern extent of Gloucester.	Contribution - some evidence of the eastward expansion of Brockworth beyond the strong boundary of the A46 into open countryside associated with linear development along the eastern edge of the A46. Urbanising influences around Cirencester Road to south of area. Strong boundary of A417 would contain future development.	Limited Contribution - provides context for the town, but no direct links with historic centres.	Predominantly agricultural (pasture and arable) land, abutting the scarp slope and within Cotswolds AONB. Some contribution to openness, but relatively weak given enclosure by the strong boundaries of the A46 and A417, and detachment from the main body of the Green Belt separating Cheltenham and Gloucester. Farmed land but strongly intruded by residential (around Cirencester Road), commercial (along A46) and agricultural development. Limited direct functional relationship with Brockworth because of severance by the A46. Although assessed as making a limited contribution to the Green Belt purposes, it is designated as AONB and therefore may not be considered appropriate for development for other reasons.	Limited Contribution
SE2 - land to the east of Shurdington Road (A46) and north of the A417.	Flood Plain (part) (AONB) Key Wildlife Site - part, with co-extensive SSSI	Significant Contribution - forms a clear southerly boundary to Leckhampton, particularly along Church Road and prevents further ribbon development between Leckhampton and Shurdington.	Significant Contribution - limits eastward expansion of Shurdington towards Cheltenham, thus maintaining the size of gap between Cheltenham and Gloucester.	Significant Contribution - forms clear southerly boundary to Leckhampton, defined by Church Road, Collum End Rise and Leckhampton Hill preventing encroachment. There are few strong boundary options, although there are urbanising influences around Shurdington.	Significant Contribution - maintains openness of land, emphasised by views from Leckhampton Hill and environs.	Forming the scarp slope of the Cotswolds AONB, this land is of critical importance to maintaining openness and distant views to land between Cheltenham and Gloucester, and as a backdrop to Cheltenham. Land is of broadly uniform character being enclosed fields and woodland on the scarp slope and coarser scale cropland towards Shurdington. Plays a key role in separating Gloucester and Cheltenham. There are no strong boundary options to prevent encroachment in the longer term.	Significant Contribution
SE3 - land to the south-west of Leckhampton, bounded by the A46 to the west and the Leckhampton Lane to the south.		Significant Contribution - part of separation between Leckhampton and Shurdington preventing further ribbon development between the two.	Significant Contribution - limits the merger of Leckhampton/ Warden Hill and Shurdington (thus separating Cheltenham and Gloucester), there being significant ribbon development along the A46.	Significant Contribution - forms part of southern boundary to Leckhampton. Northern boundary is relatively weak however, comprising a field ditch and hedge line. There are no obvious strong boundary options to prevent longer term encroachment.	Contribution - part of open belt of land to the south of Cheltenham, complementary to segment SE2.	Intensively farmed land of moderately sized fields with substantial hedgerows. Adjacent, and complementary, to segment SE2. A significant component of land separating Cheltenham and Gloucester. Acts to limit further ribbon development along the A46 which would close the gap between Leckhampton and Shurdington. Relatively weak inner boundary, parallel to Farm Lane.	Significant Contribution
SE4 - land immediately to the south of Warden Hill, bounded by the A46 to the east, Up Hatherley Way to the north and Chargrove Lane to the south and west.		Significant Contribution - forms clear southern boundary to Hatherley preventing ribbon development along Up Hatherley Way and Shurdington Road.	Significant Contribution - limits joining of Leckhampton and Shurdington, thus separating Cheltenham and Gloucester.	Significant Contribution - forms clear southerly boundary to recent development at Hatherley, well defined by boundary of Up Hatherley Way preventing encroachment.	Contribution - part of open belt of land to the south of Cheltenham, complementary to segments SE2 and SE3.	Intensively farmed land of moderately sized fields with well-tended hedgerows. Strong boundaries defined by Up Hatherley Way and Chargrove Lane. Forms the boundary to the outer edge of Cheltenham. Adjacent, and complementary to, segment SE5. Part of key land separating Cheltenham and Gloucester as it limits development between Leckhampton and Shurdington and ribbon development along the A46.	Significant Contribution
SE5 - land to the north-west of Shurdington, bounded by the A46 to the east, Chargrove Lane to the north-east, the Cheltenham-Gloucester railway line to the north-east and the M5 to the west.	Key Wildlife Site - part, with co-extensive SSSI	Significant Contribution - forms a clear southern boundary to Hatherley preventing ribbon development along Shurdington road and around Badgworth.	Significant Contribution - a critical component of land separating Cheltenham and Gloucester.	Significant Contribution - forms clear southerly boundary to recent development at Hatherley, well defined by boundary of Up Hatherley Way. There are no obvious strong boundaries to prevent development in the longer term.	Contribution - part of open belt of land to the south of Cheltenham, complementary to segments SE2 and SE3.	Intensively farmed open expanse of land, with moderate to large sized fields, with strong structural hedgerow features, forming significant element of key land separating Cheltenham and Gloucester. Adjacent, and complementary to segments SE3 and SE4 maintaining separation between Leckhampton/Hatherley and Shurdington. Adjacent, and complementary to, segment SE6 being key land separating Cheltenham and Gloucester. There are no strong boundaries to prevent longer term encroachment.	Significant Contribution



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SE6 - land bounded by the A417 to the south, M5 to the west, A46 to the east and Badgeworth Lane to the north.		Significant Contribution - prevents ribbon development along the A46 between Shurdington and Brockworth.	Significant Contribution - a critical component of land separating Cheltenham and Gloucester.	Significant Contribution - part of the open countryside separating Gloucester and Cheltenham. There are no obvious strong boundaries that would prevent encroachment in the longer term.	Contribution - part of open belt of land to the south of Cheltenham, complementary to segments SE2, SE3 & SE5.	Intensively farmed open expanse of land, with moderate to large sized fields, with strong structural hedgerow features, forming a significant part of the land separating Cheltenham and Gloucester. Adjacent, and complementary to, segments SE5 and SE2, these being key parts of the land separating Cheltenham and Gloucester. There are no obvious strong boundaries to prevent longer term encroachment.	Significant Contribution
SE7 - land to the south of the A417 and west of Brockworth Road.		Contribution - prevents some northward sprawl from Brockworth and ribbon development along Mill Lane, although A417 forms a stronger northern edge to contain development.	Limited Contribution - arguably part of the wider belt of land separating Cheltenham and Gloucester, although limited connection with main extent of land due to severance by the strong boundary of the A417.	Limited Contribution - function in preventing northward spread of Gloucester, defined by Horsbere Brook, but already significant intrusion north of this boundary to Mill Lane including residential, sports centre and school. A417 provides strong long term boundary to prevent encroachment.	Limited Contribution - forms part of the north-eastern edge to Gloucester, but not key to its setting.	Variable strength of southern edge, initially defined by Horsbere Brook and associated tree line, but intrusion between this and Mill Lane weakens its integrity. Land to the north of Mill Lane is comprised of large agricultural and playing fields with relatively weak boundary features. The A417 to the north forms a very strong long term boundary as does the A46 to the east. As such, the Green Belt function of this parcel is compromised	Limited Contribution
SE8 - land to the south of the A417, west of Brockworth Road east of Valiant Way.		Contribution - prevents some northward sprawl from Brockworth, although A417 forms a stronger northern edge than Horsbere Brook and tree-line to the south of the segment.	Limited Contribution - arguably part of the wider belt of land separating Cheltenham and Gloucester, although limited connection with main extent of land due to severance by the strong boundary of the A417.	Limited contribution - northern edge to Gloucester poorly defined by Horsbere Brook. A417 provides strong long term boundary to prevent encroachment.	Limited Contribution - scale of segment limits contribution to the setting of Gloucester.	Horsbere Brook and associated planting defines the urban edge of Brockworth forming a boundary, but not a particularly strong one. The edge between Valiant Way and westerly extent of Brockworth is weak. The overall Green Belt function of this segment is relatively limited and therefore it merits further consideration should land be required for release from the Green Belt for development and should other elements of the evidence base suggest that it is appropriate. The A417 forms a strong long term boundary to prevent encroachment.	Limited Contribution
SE9 - land to the south of the A417, east of the M5 and west of Valiant Way and north of Delta Way.		Contribution - part of the northern edge to Gloucester preventing sprawl, although limited opportunity for ribbon development due to nature of surrounding road infrastructure.	Limited Contribution - limited connection with main extent of Green Belt due to severance by the A417 and motorway junction.	Limited Contribution - encroachment containment by A417, M5, Valiant Way and Delta Way.	Limited Contribution - separated from Gloucester by dominant feature of the M5.	Effectively remnant land from the development of the junction between the M5 and the A417, comprising one large field and peripheral scrubland. As such, notwithstanding the strong boundaries formed by Delta Way to the south and Valiant Way to the east, the Green Belt function of this land is limited by its size and isolation from adjacent segments.	Limited Contribution
SE10 - land immediately to the west of Grovefield Way, bounded by the Cheltenham-Gloucester railway line to the south, the M5 to the west, and the A40 to the north.		Significant Contribution - forms the western edge to Cheltenham at Grovefield Way preventing further ribbon development/sprawl westwards along the A40, although there has already been ribbon development along the Reddings and the A40 corridor.	Significant Contribution - important part of the strategic gap between Cheltenham and Gloucester at a very narrow point.	Significant Contribution - important part of the westerly edge of Cheltenham preventing encroachment which would significantly narrow the gap between the towns. Relatively strong boundary at Grovefield Way although some encroachment at the Reddings.	Significant Contribution - provides context for Cheltenham, and views from the west into Cheltenham.	A complex (structurally and in land use) area defined by the strong boundaries of the Cheltenham-Gloucester railway to the south, A40 to the north and M5 to the west. The land, despite some significant compromises to its openness to the east of its extent (principally associated with linear development at The Reddings), nevertheless plays a critical role in the separation of Cheltenham and Gloucester, particularly at this point where the Green Belt is at its narrowest. It plays a role in preventing ribbon development along the A40 corridor.	Significant Contribution
SW1 - land between Gloucester and Churchdown bounded by the M5 to the south-east, A417 to the south-west and the Cheltenham-Gloucester railway line to the north-west.	Key Wildlife Site (part) (Special Landscape Area)	Significant Contribution - with the A417 as its clear southern boundary and northern edge to Gloucester, this segment forms a critical role in preventing ribbon development around Churchdown.	Significant Contribution - integral part of land separating Churchdown and Gloucester, which if developed would significantly narrow the gap.	Significant Contribution - integral to preventing spread of Gloucester and Churchdown into this open land. No strong boundaries within the segment to prevent encroachment longer term.	Significant Contribution - integral to maintaining the northern identity of Gloucester and its views from Gloucester from Churchdown Hill.	This segment forms a fundamental part of the Green Belt separating Cheltenham and Gloucester, largely comprised of mixed farmland and woodland, with strong field boundaries. Centred on Churchdown Hill, this segment has a strong character and sense of openness. This segment is important for maintaining the wider A40 corridor of Green Belt and there are few strong boundary options to prevent encroachment.	Significant Contribution

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SW2 - land to the east of Churchdown, bounded by the M5 to the east and Brockworth Road to the south.		Significant Contribution - prevents eastward sprawl from Churchdown and ribbon development along Brockworth Road.	Significant Contribution - helps to protect open land between Cheltenham and Gloucester at this relatively narrow point.	Limited Contribution - prevents eastward expansion of Churchdown into open countryside with clear boundaries. Strong boundary with M5 to prevent longer term encroachment.	Significant Contribution - the buffer between Churchdown and the M5 forms an integral part of the protection of the setting of Churchdown Hill and thence to the edge of Gloucester (as defined by the A417).	Forming an extension to segment SW1, this land is distinctly open in character, being pastureland with well-defined hedgerows. Its role in preventing the eastward extension of Churchdown is fundamental, in turn contributing to the separation of Cheltenham and Gloucester at this point where the Green Belt is relatively narrow.	Significant Contribution
SW3 - land to the east of Churchdown, bounded by the M5 to the west and Cheltenham-Gloucester railway line to the north.		Significant Contribution - prevents north-eastward sprawl from Churchdown although further ribbon development along Brockfield Road is unlikely due to proximity of M5.	Significant Contribution - prevents closure of narrow gap between Churchdown and Cheltenham.	Limited Contribution - prevents eastward expansion of Churchdown into open countryside with clear boundaries. Strong boundary with M5 prevents longer term encroachment.	Contribution - provides the setting for Churchdown.	A remnant of open countryside with strongly defined boundaries which limit its connection to the wider countryside. However, it retains its openness through use as pasture land and sport and recreation, and therefore, in combination with adjoining segments, makes a significant contribution to the integrity of the Green Belt between Cheltenham and Gloucester and in particular to the separation between the settlements at one of the narrowest points of the Green Belt.	Significant Contribution
SW4 - land to the north-east of Churchdown bounded by the M5 to the east, Cheltenham-Gloucester railway line to the south and A40 to the north.		Significant Contribution - prevents north-eastward expansion of Churchdown along Paton Road, Station Road and in the A40 corridor.	Significant Contribution - prevents closure of narrow gap between Churchdown and Cheltenham.	Significant Contribution - protects open land between Churchdown and Cheltenham. Limited urbanising uses and few strong boundaries to contain development within segment.	Contribution - provides the setting for Churchdown.	The strong boundaries of the A40, M5 and the railway create a coherent segment which forms an integral part of the strategic gap between Cheltenham and Churchdown. The land is in mixed agricultural use, with strong field boundaries and open character. This area is critical to the separation of the settlements and protecting the openness of the A40 corridor.	Significant Contribution
SW5 - land between Gloucester and Churchdown bounded by the Cheltenham-Gloucester railway line to the south, A40 to the north and A40 to the west.		Significant Contribution - forms the northeast boundary of Gloucester, defined by the A417. Prevents sprawl south-westwards from Churchdown and ribbon development along southern edge of Piton Lane and the A40 corridor.	Significant Contribution - prevents the coalescence of Churchdown and Gloucester and then Cheltenham.	Limited Contribution - prevents the south-westerly expansion of Churchdown into open countryside through relatively strong boundaries.	Contribution - provides the setting for Churchdown and Gloucester.	In mixed agricultural use with strong field boundaries, this segment (along with segment SW1) forms a crucial part of the separation between Churchdown and Gloucester, and in turn between Cheltenham and Gloucester. Strong boundary definition (A40, A417, railway). Important contribution to maintaining openness of A40 corridor.	Significant Contribution
NW1 - land between Cheltenham and Churchdown, lying immediately to the west of the M5 and east of Gloucestershire Airport.		Significant Contribution - part of the open land between Churchdown and Cheltenham preventing sprawl from airport related uses and employment uses to the north and in the A40 corridor.	Significant Contribution - prevents the coalescence of Churchdown and Cheltenham at this narrow part of the gap.	Contribution - part of a number of segments preventing urban encroachment into open land between Cheltenham and Churchdown, although significant urbanisation to west at Airport. M5 would form strong boundary to east, but segment is divorced from urban area.	Limited Contribution - due to location between M5 and Airport.	Defined by the perimeter of the airport and a minor road, this segment is under pastoral use with well-defined field boundaries. It is a remnant land between the airport and the M5, but has an open countryside character which is an essential part of the relatively narrow gap between Cheltenham and Churchdown and openness along the A40 corridor.	Significant contribution
NW2 - land between Cheltenham and Churchdown forming Gloucestershire Airport, defined by the A40 to the south, B4063 Cheltenham Road to the north and Norman's Brook to the south-west.		Significant Contribution - part of the open land between Churchdown and Cheltenham preventing sprawl from airport and employment uses to the north and in the A40 corridor.	Significant Contribution - prevents the coalescence of Churchdown and Gloucester at this narrow part of the gap.	Contribution - although the airport buildings give this an urban feel, the runway is open and the strong boundaries prevent further encroachment.	Limited Contribution - due to distance from historic centres, although it helps to provide the setting for Churchdown.	Although the majority of this segment is open land given over to airport uses, there are hard runways and associated peripheral hangars which give it a more urbanised feel. However, overall the land is considered to be open, providing distant views towards Churchdown and Churchdown Hill to the south and the Cotswold escarpment to the east (particularly from Bamfurlong Lane). This plays an important role in the separation of the settlements at this narrow point in the Green Belt.	Significant contribution
NW3 - land immediately to the east of Churchdown defined by the A40 to the south, Norman's Brook to the north-east and the B4063 Cheltenham Road to the north.		Significant Contribution - forms a strong boundary to prevent eastward sprawl of Churchdown and in the A40 corridor.	Significant Contribution - prevents the coalescence of Churchdown and Cheltenham at this narrow part of the gap.	Limited Contribution - this land is of open character and strong boundaries prevent encroachment.	Limited Contribution - helps to provide the setting for Churchdown and beyond but is distant from the historic centres.	With segments NW1 and NW2, this is part of the open land between Churchdown and Cheltenham providing clear separation between the settlements. The contribution of this segment to maintaining the openness as a whole is critical at this narrow point.	Significant contribution





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NW4 - land between Innsworth and Gloucester bounded by the A40 to the south and west and built development immediately to the north and east.	Flood Plain (part)	Significant Contribution - prevents westward sprawl from Churchdown and ribbon development along Cheltenham Road East.	Significant Contribution - part of the separation between Gloucester and Churchdown (and thus Cheltenham) at this narrow part of the gap, although there is built development to the north, east and west.	Limited Contribution - land is enclosed on two sides although is linked to the open countryside to the south (segments SW5 and SW1) across the A40. Strong boundaries to contain encroachment.	Limited Contribution - parcel too small to be part of a setting for either Gloucester or Innsworth.	This segment comprises two relatively small parcels of land in mixed agricultural use with limited internal field boundaries. This is part of the land separating Gloucester and Cheltenham, although this segment is enclosed on two sides by urban development and the substantial barrier of the A40 on the other two sides, isolating it from the more substantial tract of Green Belt to the South East (segments SW5 and SW1). It plays an important role in separating the settlements at this point where the gap is narrow.	Significant Contribution
NW5 - land to the north of the A40 and west of the A38, defined by Hatherley Brook to the north and Dry Meadow Lane to the east.	Flood Plain (part)	Limited Contribution - limited opportunities for ribbon development.	Limited Contribution - maintains the separation of Gloucester and Innsworth, but does not play a role in preventing merger of Gloucester and Cheltenham.	Limited Contribution - prevents some encroachment of Longford into open countryside, but clear boundary of A38 and Hatherley Brook to contain development. Already urbanising uses/encroachment.	Limited Contribution - no visual connection with Gloucester.	An open, predominantly pastoral landscape with large fields and strong field boundaries. A significant part of this segment is flood plain. The overall contribution of this segment to Green Belt purposes is limited to containing the westward expansion of Innsworth and northward expansion of Longworth, with a relatively limited strategic function. It plays no role in separation of the settlements and has strong boundaries that could contain development.	Limited Contribution
NW6 - land immediately to the west of Innsworth, defined by Hatherley Brook to the north, Dry Meadow Lane to the west, Innsworth Lane to the south and Frog Furong Lane to the east.	Flood Plain (part) Key Wildlife Site (part) with co-extensive SSSI	Limited Contribution - Innsworth contained within well-defined road boundaries, with limited opportunities for ribbon development.	Limited Contribution - land forms the westerly extent of Innsworth, so would not bring Gloucester and Cheltenham closer together.	Limited Contribution - prevents some encroachment of Innsworth into open countryside, but there has already been encroachment. Strong boundary of Hatherley Brook to contain development.	Limited Contribution - no visual connection with Gloucester.	An intensively farmed, predominantly arable landscape of medium-sized fields and reasonably strong field boundaries. This is an open landscape which is clearly of a definite character and with the clearly defined urban edges of Innsworth Lane and Frog Furong Lane is the start of open countryside. However, the overall contribution to Green Belt function is limited to containing Innsworth with a minimal wider strategic function. Plays no role in separation of the settlements. The strong boundary of the Hatherley Brook prevents encroachment.	Limited Contribution
NW7 - land to the north of Innsworth, defined by the indistinct urban edge of Innsworth, Hatherley Brook to the north and Cheltenham Road to the south-east.		Significant Contribution - prevents the northward and eastward sprawl of Innsworth and ribbon development along Cheltenham Road East.	Significant Contribution - part of the land separating Cheltenham and Innsworth/Churchdown at a narrow point. Eastern part of the segment plays a particular role in this.	Limited Contribution - prevents the encroachment of Innsworth/Churchdown into open countryside. The Hatherley Brook forms a strong boundary.	Contribution - provides the setting for Innsworth/Churchdown, although views from Down Hatherley Lane are limited by mature hedgerows in a flat topography.	A landscape dominated by golf links (Brookhampton Court Golf Complex) forming an important open landscape setting to Innsworth/Churchdown. This segment is closely related to NW5 immediately to the north which has a golf links use on its eastern extent. Plays a key role in separation of the settlements at the narrowest part of the Green Belt along the A40 corridor.	Significant Contribution
NW8 - land to the north and west of Innsworth bounded by Hatherley Brook to the south, Down Hatherley Lane to the north, Brook Lane to the west and Cheltenham Road to the east.		Significant Contribution - prevents ribbon development along Down Hatherley Lane.	Significant Contribution - part of the land separating Cheltenham and Innsworth/Churchdown, particularly the eastern part of this segment.	Significant Contribution - prevents the encroachment of Innsworth/Churchdown/employment uses to east into open countryside. Although there are strong boundaries, the segment is divorced from the urban edge.	Contribution - provides the setting for Innsworth/Churchdown.	Open countryside with some urbanised elements (residential development to the west along Ash Lane). The land is in mixed agricultural use with strong field boundaries. It plays a role in separation of the settlements at the narrowest part of the Green Belt along the A40 corridor.	Significant Contribution
NW9 - land immediately to east of the A38 bounded by Hatherley Brook to the south-west and Brook Lane to the north-east.	Flood Plain (part)	Contribution - part of land preventing the sprawl of Twigworth and further ribbon development along the A38.	Limited Contribution - forms the westerly extent of Green Belt and does not form part of the separation between Cheltenham and Gloucester.	Limited Contribution due to clear long term boundaries, the A38 and Down Hatherley Lane.	Limited Contribution - no visual connection with Gloucester.	Open countryside in mixed agricultural use with predominantly large fields and poorly defined field boundaries. Some significant intrusion (large caravan park) at Twigworth which compromises the sense of openness. Strong boundaries combined with urbanising influences and no role in preventing separation of Gloucester and Cheltenham.	Limited Contribution
NW10 - land to the north-west of Cheltenham and north of Innsworth/Churchdown bounded by the A38 to the west, A4109 to the north, M5 to the west and Down Hatherley Lane/Cheltenham Road to the south.	(Landscape Protection Zone - part)	Contribution - prevents ribbon development associated with smaller settlements and along A38, but does not immediately adjoin built-up area.	Significant Contribution - forms an integral part of land separating Cheltenham and Innsworth, particularly the southern part of the segment.	Significant Contribution - there are few strong boundaries and the segment is divorced from the urban edge.	Limited Contribution - land is relatively remote from Gloucester and Cheltenham.	An extensive area of open countryside forming the north-western extent of Green Belt being of mixed agricultural use, with various small villages scattered throughout. Although this segment has strong outer boundaries, there are few strong boundaries within it and it is divorced from the urban edge. It plays an important role in the separation of Cheltenham and Gloucester, particularly the southern part of the segment.	Significant Contribution

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NW11 - land bounded by the B4364, B4063 lying immediately to the west of the M5.		Significant Contribution - prevents sprawl from employment related/airport related uses to the south and ribbon development along the B4063.	Significant Contribution - part of the land separating Chellenham and Innsworth at a very narrow point.	Significant Contribution - there are strong boundaries, but the segment is divorced from the urban edge.	Limited Contribution - land is relatively remote from Innsworth and Chellenham.	This small parcel of grazing land is related to in character, but not part of, land lying to the north-west, well defined by the M5. Of relatively fine-grained field pattern and well-defined field boundaries, this segment makes a significant contribution to openness of the countryside between Chellenham and Churchdown/Innsworth. It plays a key role in separation of the towns at this narrow point.	Significant Contribution
NE1 - land to the west of the urban edge of Chellenham, bounded by the M5, A40 and Bamfurlong Road to the north.		Significant Contribution - forming western boundary to Chellenham and preventing sprawl westwards from Gloucester along Bamfurlong Lane.	Significant Contribution - part of the land separating Chellenham and Innsworth at a narrow point.	Significant Contribution - there has already been encroachment in this area, and there are few clear boundary options.	Contribution - provides countryside setting for Chellenham.	This is a relatively heavily urbanised area mixed with agricultural land with strong hedgerow and treed boundaries, helping to maintain its open countryside character. It plays a key role in maintaining the separation between Chellenham and Gloucester at this narrow point.	Significant Contribution
NE2 - land to the west of the urban edge of Chellenham, bounded by the M5 to the west, B4063 to the north and Bamfurlong Road to the south.		Significant Contribution - forming western boundary to Chellenham and preventing ribbon development along Bamfurlong Lane.	Significant Contribution - part of the land separating Chellenham and Innsworth at a narrow point.	Significant Contribution - few boundary options and land is divorced from urban edge.	Contribution - western part of segment provides countryside setting for Chellenham.	Despite some significant urbanisation, this segment consists of intensively farmed, large scale arable fields characterised by open vistas. This is clearly an 'urban fringe' landscape which is part of the countryside edge to Chellenham, and is clearly defined by the road network but with few boundary options. It plays an important role in the separation of Chellenham and Gloucester.	Significant Contribution
NE3 - land bounded by the B4063 to the south and Pheasant Lane to the north.		Significant Contribution - forming western boundary to Chellenham and preventing its westward sprawl along the B4063 and Pheasant Lane.	Significant Contribution - part of the land separating Chellenham and Innsworth at a narrow point.	Significant Contribution - limited suitable boundary options to prevent longer term encroachment.	Contribution - provides countryside setting for Chellenham.	A 'remnant' agricultural landscape characterised by small-scale, irregular fields with boundary hedges in variable condition. Along with adjacent segments, this land forms a fundamental part of the definition of the western edge of Chellenham, although there is intrusion from urbanising influences such as a mobile home park. This plays a key role in separation of Gloucester and Chellenham and has limited boundary options.	Significant Contribution
NE4 - land immediately to the west of Chellenham, bounded by Fiddler's Green Lane to the east, Pheasant Lane/B4063 to the south, Hayden Lane to the west and the B4634 to the north.	Key Wildlife Site (part)	Significant Contribution - forming western boundary to Chellenham preventing its westward sprawl.	Significant Contribution - part of the land separating Chellenham and Innsworth.	Significant Contribution - few boundary options within segment.	Contribution - provides countryside setting for Chellenham.	This segment contains the western edge of Chellenham, with a strong boundary road features to the south (Fiddler's Green Lane, Springbank Road and Henley Road) with less clear definition to the north. This land forms a fundamental part of the definition of the western edge of Chellenham. It is characterised by large fields, pasture to the south, arable to the north with expansive views. It plays a key role in the separation of Chellenham and Gloucester. There are few boundary options within this segment to prevent long term encroachment.	Significant Contribution
NE5 - land bounded by the B4634 to the north, Hayden Lane to the east, the B4-63 to the south and the M5 to the west.		Significant Contribution - part of the land separating Chellenham and Innsworth, although not adjacent to built-up areas. Prevents ribbon development along B4634.	Significant Contribution - part of the land separating Chellenham and Innsworth.	Significant Contribution - there has been little encroachment with few urbanising influences. There are strong boundaries but they are divorced from the urban edge.	Contribution - provides countryside setting for Chellenham.	Part of the land containing, and giving context to, the western fringes of Chellenham, characterised by large, intensively farmed arable fields, with expansive views. This land forms a partner (in character and function) to adjacent segments to the east, north and south. It plays a key role in separation between Chellenham and Gloucester and the openness of the A40 corridor.	Significant Contribution
NE6 - land immediately to the north-west of Chellenham, bounded by B4634 to the south, Winthylbridge Lane to the west, and the A4019 to the north.		Significant Contribution - forming western boundary to Chellenham preventing ribbon development along the B4634 and A4019.	Significant Contribution - land forms part of the westerly extent of the Green Belt, but the South western part of this segment is key in preventing separation in the wider A40 corridor.	Significant Contribution - no strong boundaries to prevent longer term encroachment.	Contribution - provides countryside setting for Chellenham.	Land forming the north-west edge of Chellenham with a complex field pattern in mixed arable and pastoral uses, and of an open character, with relatively weak internal boundaries. In combination with segment NE4, the land forms a definite edge to the urban area lying immediately to the east. Key role in preventing encroachment. There are weak boundary options and increasingly to the south-west the segment plays an important role in the separation between Chellenham and Gloucester.	Significant Contribution
NE7 - land bounded by the M5 to the west, the A4019 to the north, Winthylbridge Lane to the east, and the B4634 to the south.		Significant Contribution - part of the western boundary of Chellenham, but not immediately adjacent to built-up area. Prevents ribbon development along Old Gloucester Road and A4019.	Significant Contribution - land forms part of the westerly extent of the Green Belt, and to the south plays an important role in maintaining separation.	Significant Contribution - there is no encroachment in this area and very few urbanising influences. There are strong boundaries, but the segment is divorced from the urban edge.	Contribution - part of the context for the western fringe of Chellenham.	A remoter segment characterised by large-scale arable fields and poorly defined boundaries giving expansive views. With segment NE6, this land forms an important part of the westerly context of Chellenham and with the south part of segment NW10, this forms an important part of the context of the land separating Chellenham and Innsworth, and is divorced from the urban edge.	Significant Contribution



Strategic Segment	Key Constraints	1. Check the unrestricted sprawl of large built-up areas	2. Prevent nearby towns from merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns	Overall Evaluation (existing land use; proximity and relationship to the built-up area; degree of enclosure/openness; distance and visual connection to historic urban centres/key urban areas; relationship to the countryside)	Contribution to Green Belt Purposes; Overall Traffic Light Assessment
NE8 - land to the north of Cheltenham bounded by the A4019 to the south, The Green to the west, and the River Swilgate to the north-east.		Limited Contribution - forms part of the northern boundary of Cheltenham, although significant ribbon development in this southern area.	Limited Contribution - does not perform a separation function between Cheltenham and Bishop's Cleeve or between Cheltenham and Gloucester.	Contribution - part of the buffer between Cheltenham and wider countryside to the north-west although significant urbanising influences to the south of this segment. The boundaries are weak.	Contribution - part of the setting for Cheltenham.	A tract of land which forms a broader context for Cheltenham as a whole. Land use is predominantly arable with highly variable field sizes and patterns, with strong hedgerow boundaries. Substantial retail uses about the south-eastern boundary of the segment, creating a strongly urbanised feel. Significant ribbon development along the A4019 compromises the sense of openness of the southern part of this segment. This segment does not play a role in separating Cheltenham and Bishop's Cleeve or Cheltenham and Gloucester. Any development would need to create strong boundaries with well planned urban form.	Limited Contribution
NE9 - land to the north-west of Cheltenham, bounded by the A4019 to the south, M5 to the west, and the Uckington-Hardwicke Road to the east and north.		Significant Contribution - part of open countryside. Limits ribbon development along the A4019.	Limited Contribution - forms north-westerly extent of Green Belt and does not separate Cheltenham and Bishop's Cleeve or Cheltenham and Gloucester.	Significant Contribution - part of the buffer between Cheltenham and wider countryside to the north-west. There is little encroachment and few urbanising influences. The boundary options are weak in this segment.	Limited Contribution - too remote to act as a setting.	An outer segment of the open land to the north-west of Cheltenham characterised by intensive arable uses and extensive views. This land complements adjacent segments (NE10 and NE11). This segment does not play a role in separating Cheltenham and Bishop's Cleeve or Cheltenham and Gloucester but prevents further ribbon development to the M5 and has few strong internal boundaries to prevent encroachment.	Contribution
NE10 - land to the north-west of Cheltenham, bounded by the Elmstone-Hardwicke to Hardwicke Road to the south, M5 to the west and Hyde Brook to the north-east.		Contribution - part of open countryside, but no significant role in preventing ribbon development. Limited existing ribbon development and does not adjoin built-up area.	Limited Contribution - forms northerly extent of Green Belt and does not separate Cheltenham and Bishop's Cleeve or Cheltenham and Gloucester.	Significant Contribution - part of the buffer between Cheltenham and wider countryside to the north-west. Boundary options are weak.	Limited Contribution - too remote to act as a setting.	An outer segment of the open land to the north-west of Cheltenham characterised by intensive arable uses and extensive views. This land complements adjacent segments (NE9 and NE11). It does not play a role in separating Cheltenham and Bishop's Cleeve or Cheltenham and Gloucester but prevents further ribbon development to the M5 and has few strong internal boundaries to prevent encroachment.	Contribution
NE11 - land to the north of Cheltenham bounded by Stoke Road to the north, the River Swilgate to the west Road to the north by the Birmingham-Bristol railway to the east and a track to the south.	Key Wildlife Site (part)	Contribution - part of open countryside preventing ribbon development south of Stoke Road.	Limited Contribution - forms northerly extent of Green Belt and does not separate Cheltenham and Bishop's Cleeve or Cheltenham and Gloucester.	Significant Contribution - part of the buffer between Cheltenham and wider countryside to the north. No strong internal boundaries to prevent encroachment. Some urbanising uses but no significant encroachment.	Limited Contribution - too remote to act as a setting.	An outer segment of the open land to the north-west of Cheltenham characterised by intensive arable and some urban fringe land uses, with variable field patterns and sizes. This land complements adjacent segments (NE10 and NE14). It does not make a significant contribution to any of the Green Belt purposes but prevents further ribbon development to the M5 and has few strong internal boundaries to prevent encroachment.	Contribution
NE12 - land to the north-west of Cheltenham, immediately to the east of Elmstone Hardwicke bounded by The Green and Lowdell Lane to the west and an unmade track to the east.		Limited Contribution - part of open countryside. Not adjacent to built-up area so limited ribbon development opportunities.	Limited Contribution - forms northerly extent of Green Belt and does not separate Cheltenham and Bishop's Cleeve or Cheltenham and Gloucester.	Significant Contribution - part of the buffer between Cheltenham and wider countryside to the north-west. There are some urbanising uses but no significant encroachment. This segment is divorced from the urban edge.	Limited Contribution - too remote to act as a setting.	An outer segment of the open land to the north-west of Cheltenham characterised by intensive arable uses and extensive views. This land complements adjacent segments (NE9, NE10 and NE11). This does not play any role in the separation of settlements.	Contribution
NE13 - land immediately to the north of Cheltenham bounded by Dog Bark Lane to the west, an un-named land-drain to the north-east, Lowdell Lane to the north-west, and Swindon to the south-east.		Limited Contribution - part of open countryside preventing ribbon development from Swindon.	Limited Contribution - does not perform a separation function between Cheltenham and Bishop's Cleeve or Cheltenham and Gloucester.	Contribution - forms the northern boundary of Cheltenham preventing encroachment. Relatively weak boundaries within segment. Stronger boundaries would contain development.	Limited Contribution - no visual connection to Cheltenham.	Land which has a weak urban edge at this location. It is an irregularly structured arable landscape with relatively poor internal boundary definition. Any development here would need to create strong boundaries through well planned urban form. Does not play a role in separation of Cheltenham and Bishop's Cleeve or Cheltenham and Gloucester.	Limited Contribution

Strategic Segment	Key Constraints	1. Check the unrestricted sprawl of large built-up areas	2. Prevent nearby towns from merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns	Overall Evaluation (existing land use; proximity and relationship to the built-up area; degree of enclosure/openness; distance and visual connection to historic urban centres/key urban areas; relationship to the countryside)	Contribution to Green Belt Purposes; Overall Traffic Light Assessment
NE14 - land to the west of Brockhampton, between the railway line to the east and an unnamed land-drain to the south. To the north is the track around the quarry site.		Contribution - part of open countryside. Limited role in preventing sprawl/ribbon development as segment is not adjacent to built-up area.	Significant Contribution - part of the land separating Chellenham and Bishop's Cleeve.	Contribution - part of the buffer between Chellenham and wider countryside to the north preventing encroachment. The internal boundaries are weak.	Limited Contribution - no visual connection to Chellenham.	Land which forms part of the important separation of Chellenham and Bishop's Cleeve. Quarry and landfill uses to the north-east.	Significant Contribution
NE15 - land between Brockhampton Lane and the Birmingham-Bristol railway, immediately to the north of Swindon.		Contribution - part of open countryside preventing sprawl from south-west, although relatively weak boundaries here.	Significant Contribution - part of the land separating Chellenham and Bishop's Cleeve at a narrow point.	Significant Contribution - forms the northern boundary of Chellenham preventing encroachment. The boundaries are relatively weak in places and there are few urbanising influences.	Limited Contribution - no visual connection to Chellenham.	Land which forms part of the separation of Chellenham and Bishop's Cleeve at its narrowest point.	Significant Contribution
NE16 - land lying to the south-west of Bishops Cleeve bounded by the Birmingham-Bristol railway to the west Birmingham-Bristol railway to the west, Stoke Road to the north, the A435 to the east and Hyde Brook to the south.		Significant Contribution - forms the south-western boundary of Bishop's Cleeve, preventing sprawl around Brockhampton and south-west Bishop's Cleeve's Stoke Orchard.	Significant Contribution - forms a significant part of the open land between Chellenham and Bishop's Cleeve.	Significant Contribution - forms part of the open land between Chellenham and Bishop's Cleeve preventing westward expansion of Bishop's Cleeve. There are few strong boundaries.	Contribution - forms part of the open land between Chellenham and Bishop's Cleeve.	Land which is critical to the separation of Chellenham and Bishop's Cleeve, dominated by arable farming but with significant quarrying activity to the north. Medium-sized fields with strong field boundaries. Prevents the westward expansion of Bishop's Cleeve and ribbon development. The boundary options to prevent encroachment are weak.	Significant Contribution
NE17 - land bounded by Hyde Brook to the north, the Birmingham-Bristol railway to the west and Hyde Lane to the south-east.		Significant Contribution - forms part of the open land between Chellenham and Bishop's Cleeve. Prevents ribbon development around Brockhampton and east of Swindon.	Significant Contribution - forms part of the open land between Chellenham and Bishop's Cleeve at a narrow point.	Significant Contribution - forms part of the open land between Chellenham and Bishop's Cleeve preventing encroachment south-west from Bishop's Cleeve. Few strong boundary options.	Significant Contribution - forms part of the open land between Chellenham and Bishop's Cleeve forming part of the setting of the settlement.	Land which is critical to the separation of Chellenham and Bishop's Cleeve at one of the narrowest points, closely related to the character of segment NE18.	Significant Contribution
NE18 - land immediately to the north of Chellenham, bounded by the Chellenham-Honeybourne railway to the west, Hyde Lane to the north, the A435 to the east and Swindon Lane to the south.		Significant Contribution - forms the northern boundary of Chellenham preventing further development on the southern side of Swindon Lane and ribbon development along the A435.	Significant Contribution - forms part of the open land between Chellenham and Bishop's Cleeve.	Significant Contribution - forms part of the open land between Chellenham and Bishop's Cleeve preventing encroachment of Chellenham northwards and Bishop's Cleeve south-eastwards along the A435. There are few clear boundary options.	Significant Contribution - forms part of the open land between Chellenham and Bishop's Cleeve forming part of the setting of the settlement.	Land which is critical to the separation of Chellenham and Bishop's Cleeve. If this area was developed the two would join up. An extensive arable landscape with poor field boundary definition giving a strongly open aspect, particularly when viewed from the higher ground where the A435 crosses the railway line. Swindon Lane forms a clear urban edge the north of Chellenham.	Significant Contribution
NE19 - land lying immediately to the south of Bishop's Cleeve, bounded by the A435 to the west, by the Chellenham-Honeybourne railway to the east and the variable urban edge of Bishop's Cleeve to the north.		Significant Contribution - forms the southern boundary of Bishop's Cleeve preventing sprawl southwards around Read Way and Crown Drive and ribbon development along the A435.	Significant Contribution - forms part of the main area of open land between Chellenham and Bishop's Cleeve.	Significant Contribution - forms part of the open land between Chellenham and Bishop's Cleeve preventing encroachment of Bishop's Cleeve southwards. Limited boundary options.	Significant Contribution - forms part of the open land between Chellenham and Bishop's Cleeve forming part of the setting of the settlement and the racecourse.	Land which is critical to the separation of Chellenham and Bishop's Cleeve, characterised by pastoral land use with variable boundary definition, and openness allowing extensive views to the AONB to the east. Prevents southern expansion of Bishop's Cleeve and merging of settlements at this narrow point. There are limited boundary options.	Significant Contribution





Strategic Segment	Key Constraints	1. Check the unrestricted sprawl of large built-up areas	2. Prevent nearby towns from merging into one another	3. Assist in safeguarding the countryside from encroachment	4. Preserve the setting and special character of historic towns	Overall Evaluation (existing land use; proximity and relationship to the built-up area; degree of enclosure/openness; distance and visual connection to historic urban centres/key urban areas; relationship to the countryside)	Contribution to Green Belt Purposes; Overall Traffic Light Assessment
NE20 - land lying immediately to the south of Bishop's Cleeve, bounded by the Cheltenham-Honeybourne railway to the west, variable boundaries to the east, and Southam Lane to the south.	(Special Landscape Area - part)	Significant Contribution - forms the southern boundary of Bishop's Cleeve preventing sprawl along New Road and Gambles Lane and around Southam.	Significant Contribution - forms part of the gap between Cheltenham and Bishop's Cleeve.	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve preventing encroachment of Bishop's Cleeve southwards. Few long term strong boundary options. There are some urbanising influences, but the majority of the land is open.	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve forming part of setting of Cheltenham.	Land which is critical to the separation of Cheltenham and Bishop's Cleeve, akin to segments NE19 and NE20, but with relatively uniform field pattern and definition, and openness allowing extensive views to the AONB to the east. Prevents the southern expansion of Bishop's Cleeve. There are few strong boundary options.	Significant Contribution
NE21 - land lying between Bishop's Cleeve and Cheltenham, bounded by the Cheltenham-Honeybourne railway to the west, Southam Lane to the north, the B4632 to the east and Hyde Brook to the south.	(Special Landscape Area - part)	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve preventing sprawl to south and east of Southam, in particular preventing further ribbon development along Southam Lane.	Significant Contribution - forms part of the gap between Cheltenham and Bishop's Cleeve.	Significant Contribution - there are urbanising influences around Southam, but generally the segment is open with no significant encroachment. Strong boundary options but divorced from urban edge.	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve forming part of its setting and setting to the racecourse.	Land which is critical to the separation of Cheltenham and Bishop's Cleeve, akin to segments NE19 and NE20, but with relatively uniform field pattern and characterised by mixed agricultural land use with variable boundary definition, and openness allowing extensive views to the AONB to the east and the racecourse to the south. Segment is divorced from urban edge.	Significant Contribution
NE22 - land lying immediately to the north of Cheltenham, bounded by the A435 to the west, the Cheltenham-Honeybourne railway to the north-west, Hyde Brook to the north-east, the B4632 to the east and the variable urban edge of Cheltenham to the south.		Significant Contribution - forms the northern boundary of Cheltenham preventing sprawl along the A435, although there are strong urbanising influences around the racecourse and around Prestbury village where there is a lot of ribbon development.	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve.	Significant Contribution - prevents the northward encroachment of Cheltenham into open countryside. The northern part of this segment is open, but there are significant urbanising uses associated with this. There are few strong boundary options/racecourse and around Prestbury village.	Significant Contribution - forms part of the open land between Cheltenham and Bishop's Cleeve forming part of the setting of Cheltenham.	Much of land is used as a racecourse and extending to Prestbury village in the east, characterised by disruption of openness caused by the buildings and features associated with racing activities, but nevertheless a critical part of the land separating Cheltenham and Bishop's Cleeve and checking the northward expansion of Cheltenham and sprawl along the A435. There are few strong boundary options to contain encroachment in the longer term.	Significant Contribution



## **Appendix E**

# **Comparison with Results of Previous Green Belt Reviews**



Table E.1 A Comparison between the Evaluation of the SWRA (Joint Study Area), AERC and AMEC Green Belt Studies

Note: Colour coding changed to be consistent with that used in AMEC report for ease of reference

Please see section 5.5 of main report regarding general differences in results. Direct comparison of results is not possible due to different study areas and different study remits.

SWRA Area/JSA Area	Ranking of Sensitivity to Change/JSA score	AMEC Parcel	AMEC Score	AMEC Recommendation	AERC Parcel(s)	AERC Score	AERC Explanation/Comparison of Scores
Land between Cheltenham and Bishop's Cleeve	<b>Second least harm</b> 4.3.3 The principal aims of the Cheltenham and Gloucester Green Belt is to protect Cheltenham and Gloucester and Cheltenham and Bishop's Cleeve from merging and to define a limit to urban sprawl. In this connection the JSA has been able to identify a strategic area which, if lost, would fundamentally undermine the purpose of the Green Belt in respect of preventing Cheltenham coalescing with Gloucester. No such similar conclusion is available in respect of Cheltenham and Bishop's Cleeve.  Score 3 out of 5 in JSA work (where 1 is least important and 5 is most important)	NE22	Significant contribution	<i>Table 5.2 Recommendation:</i> Maintenance of the separation between Cheltenham and Bishop's Cleeve is critical to fulfilling the purpose of Green Belt designation (as extended in 1981).	A5, A9	Lowest Scores	4.8.1 The majority of the sub areas (including A4, A7, A10, G14, G19, G13, G12, G15, G18) that fall within this area received high scores and they make significant contributions towards purpose II, (prevent neighbouring towns from merging).  Exec Summary 13. The results of the objective scoring process showed that the area between Cheltenham and Bishop's Cleeve generally contributes more to achieving Green Belt purposes than other areas.  The AMEC assessment and AERC scores are broadly consistent, although AERC considered much smaller parcels of land which accounts for some of the differences in areas immediately adjoining the urban area near Cheltenham Racecourse and Prestbury. The JSA work did not place as much emphasis on the importance of this land in relation to the purpose of Green Belt designation (as extended in 1981) to maintain separation between Cheltenham and Bishop's Cleeve.
					A2, A3, A6, A8, A11	Average Scores	
					A4, A7, A10	Highest Scores	
		NE19	Significant contribution		A1, A10	Highest Scores	
					G17	Average Score	
		NE18	Significant contribution		G10, G11, G12, G13, G14, G15, G16, G18, G19	Highest Scores	



SWRA Area/JSA Area	Ranking of Sensitivity to Change/JSA score	AMEC Parcel	AMEC Score	AMEC Recommendation	AMERC Parcel(s)	AMERC Score	AMERC Explanation/Comparison of Scores
		NE15	Significant Contribution		G2	Average Score	The AMEC report sees this area as critical to the separation of Cheltenham and Bishop's Cleeve
		NE14	Significant Contribution		G1	Average Score	Same assessment
Land to the north west of Cheltenham	Least harm (No narrative justification - only scoring [1 out of 5])	NE13	Limited Contribution	<p><i>Table 5.2 Recommendation:</i></p> <p>Whilst containing Cheltenham on its north-western boundary, extensive ribbon development along the north side of the A4019 severely limits the sense of openness of the southern portion (as viewed from this corridor) and compromises its overall function. Segments NE8 and NE13 are of a similar character, separated only by the reasonably strong boundary feature of Dog Bark Lane. Towards the west both segments increasingly share characteristics and functions of the outer segments of the Green Belt and therefore merit further consideration for possible release should the land be required.</p>	G4, G6, G7, G8	Lowest Scores	<p>4.8.1 The sub areas to the west and north-west (including sub areas G4, 6 and 7 scored 'Low' because they do not play a role fulfilling the purpose II, preventing neighbouring towns from merging. As this is the perceived most important Green Belt purpose, a low score on this significantly reduced these sub areas overall score. Additionally, the results of the analysis show these sub areas do little in assisting in safeguarding the countryside from encroachment (purpose III).</p> <p>JSA and AMEC assessment similar. AERC similar score for majority of area but some difference in relation to AERC G5 and G9. Difference could be due to smaller parcels considered in AERC report as opposed to more strategic parcels in AMEC assessment.</p>
		NE8	Limited Contribution		G5	Highest Score	
					G9	Average Score	
		NE6	Significant Contribution	This parcel is seen as critical to preventing the sprawl of Cheltenham.	F1	Average Score	Difference in assessment/score likely to relate to methodology and AMEC parcels being much larger, with AERC parcels only covering the area immediately adjoining the urban edge
			Significant	This parcel is seen as critical to preventing the merging of Cheltenham	F5, F6, F7, F10	Lowest Scores	As Above

SWRA Area/JSA Area	Ranking of Sensitivity to Change/JSA score	AMEC Parcel	AMEC Score	AMEC Recommendation	AMEC Parcel(s)	AERC Score	AERC Explanation/Comparison of Scores
			Contribution	and Churchdown at a narrow point.			
		NE4			F8, F9, F11	Average Scores	As Above
Land to the west of Cheltenham	<b>Second least harm</b> (No narrative justification - only scoring [4 out of 5])	NE3	Significant Contribution	<i>Table 5.2 Recommendation:</i> Critical to preventing the sprawl of Cheltenham and towards the south the merger of Cheltenham and Churchdown.	F12, F14	Average Scores	Exec Summary 13. Sub-areas to the north-west and west of Cheltenham scored lowest against Green Belt purposes.  AMEC report considers these parcels to be key to preventing merger between Cheltenham and Churchdown at this narrow point in the Green Belt.
		NE2	Significant Contribution		F13	Average Scores	
		NE1	Significant Contribution		F15	Average Scores	
		SE10	Significant Contribution		E1, E2, E3	Average Scores	
Land to the south-west of Cheltenham	<b>Second least harm</b> (No narrative justification - only scoring [3 out of 5])	SE5	Significant Contribution	<i>Table 5.2 Recommendation:</i> Critical to the separation of Cheltenham and Gloucester, being the original purpose of Green Belt designation.	E4, E5, E6	Average Scores	No AERC narrative. AMEC's SE5 is a very large parcel, and AERC's E4, E5 and E6 are very small parcels which already have quite an urban feel. This is therefore not a direct comparison.
North of Gloucester City Centre	<b>Least harm (1 out of 5 in JSA work)</b>	NW5, NW6, NW9	Limited Contribution	<i>Table 5.2 Recommendation:</i> The openness is compromised by intrusive development. Limited function in separation between settlements, so case for re-examining boundaries particularly in relation to Innsworth where existing boundary features could be used to create new long term boundaries.	NA	NA	Similar assessment/scoring between AMEC and JSA/SWRA work

SWRA Area/JSA Area	Ranking of Sensitivity to Change/JSA score	AMEC Parcel	AMEC Score	AMEC Recommendation	AERC Parcel(s)	AERC Score	AERC Explanation/Comparison of Scores
North east of Gloucester	<b>Second least harm, although JSA work scores as most harm</b> (No narrative justification - scoring [5 out of 5] in JSA work)	SW1, SW5	Significant Contribution	<i>Table 5.2 Recommendation:</i> Critical to the separation of Cheltenham and Gloucester, being the original purpose of designation.	NA	NA	Difference is that AMEC report considers this narrow gap between Gloucester and Churchdown as key to maintaining separation between Gloucester and Cheltenham. JSA and AMEC score similar, although SWRA considered that this land made less contribution to Green Belt purposes.
North of Brockworth	<b>Third least harm</b> (No narrative justification - scoring [5 out of 5] in JSA work)	SE7, SE8, SE9	Limited Contribution	<i>Table 5.2 Recommendation:</i> Whilst forming the immediate boundary to Gloucester, intrusion of urban uses compromises its sense of openness. Severance from the main Green Belt tract to the north by the A417 further compromises its function, meaning that there could be opportunities for re-examining its designation and boundaries. Segment SE9, in particular, because of its enclosure on all sides by major roads (and being one field) serves little or no Green Belt function.	NA	NA	Buchanan ranking of sensitivity of change score this differently from JSA work which scored this area highly for preventing towns merging. The AMEC report considers the severance from the Green Belt by the A417 and the role that this robust boundary could have in preventing further narrowing of the gap.
South of Cheltenham	No commentary, scored 4 out of 5 in JSA work	SE2, SE3	Significant Contribution	<i>Table 5.2 Recommendation:</i> Critical to the separation of Cheltenham and Gloucester, being the original purpose of Green Belt designation. Re-definition of the inner boundaries of segment SE3 could be required, perhaps along Field Lane, to provide a firmer long-term boundary.	NA	NA	Similar assessment/scoring.

# Appendix F

## Example Green Belt Policies

### Tunbridge Wells Core Strategy (Adopted June 2010)

#### Core Policy 2: Green Belt

The boundaries of the Green Belt are defined on the adopted Proposals Map and are indicated on the Key Diagram at the end of this document.

1. The general extent of the Green Belt will be maintained for the Plan period.
2. A long-term land reserve (designated in this Plan as 'Rural Fringe') will be maintained to ensure that Green Belt boundaries will not need to be altered at the end of the Plan period.
3. There will be a general presumption against inappropriate development that would not preserve the openness of the Green Belt, or which would conflict with the purpose of including land within it. Any new development should accord with the national planning provisions of Planning Policy Guidance Note 2: *Green Belts* (PPG2) or its replacement.
4. Infill development and redevelopment within the designated 'Major Developed Sites' within the Green Belt will be allowed where it accords with the national planning provisions of PPG2 or its replacement.

#### The Function of the Green Belt

- 5.28 The Green Belt, sometimes referred to as the Metropolitan Green Belt, is a long-standing instrument of national and regional planning policy. The Planning White Paper (May 2007), which informed the Planning Act 2008, stated that "*the Government is committed to the principles of the Green Belt and will make no fundamental changes to the planning policy as set out in Planning Policy Guidance Note 2: Green Belts 1995 (PPG2).*"
- 5.29 The outer boundary of the Green Belt was defined by the Kent Countryside Plan 1983. The Tunbridge Wells Borough Local Plan 1996 reviewed the Green Belt boundaries of the previous area-based Local Plans for Royal Tunbridge Wells, Southborough and Paddock Wood, which defined the Green Belt boundary adjoining these settlements. The 1996 Local Plan also defined the inner boundaries for the remainder of the settlements within the Plan area covered by the Green Belt.
- 5.30 The fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open and it follows that the most important characteristic of the Green Belt is its openness. Green Belts perform five key functions:
  - preventing urban sprawl;
  - preventing towns from merging into one another;
  - safeguarding the countryside from encroachment;
  - preserving the setting and character of historic towns; and
  - helping urban regeneration, by encouraging the recycling of under-used and outworn urban land and buildings.

#### Green Belt Boundaries

- 5.31 It remains the Borough Council's intention to maintain the general extent (i.e. its overall coverage) of the Green Belt in accordance with Government guidance that, once Green Belt boundaries have been established, they should be altered only exceptionally, to ensure that its primary functions of maintaining openness and preventing the coalescence of settlements are retained. Similarly, the emerging South East Plan confirms that there is strong public support for the concept of the Green Belt and that the functions of the Green Belt are entirely consistent with the spatial strategy for the region.
- 5.32 In terms of the detailed inner Green Belt boundaries around the settlements in the Borough, the emerging South East Plan states, in the supporting text to Policy AOSR8: Tonbridge/Tunbridge Wells Hub, that "*there may be a likely need for small scale Green Belt review at Tunbridge Wells*" in order to be able to accommodate sufficient development here to support its Regional Hub status (Secretary of State's Proposed Changes). This is capable of being an exceptional circumstance in which the boundaries could be reviewed (PPG2, paragraphs 2.6-2.7). Any review would be dependent on there being no suitable non-Green Belt sites available to support the requirements of the Regional Hub. The Borough Council would then consider the release of sites within the Green Belt that are contiguous with the Limits to Built Development (LBD) of Royal Tunbridge Wells and Southborough where this would least compromise the function of the Green Belt.
- 5.33 The Borough Council's Strategic Housing Land Availability Assessment (SHLAA) and Annual Monitoring Report (AMR) will help to monitor whether there are sufficient non-Green Belt sites to support the Regional Hub status. The first SHLAA, completed in early 2009, showed that Green Belt sites should not need to be released during the Plan period. In locations other than Royal Tunbridge Wells and



Southborough, no Green Belt sites will be allocated or released during the Plan period (see also Core Policy 9: Development in Royal Tunbridge Wells and Core Policy 10: Development in Southborough).

### Development in the Green Belt

- 5.34** Within the Green Belt there will be a presumption against permitting new development, or changes of use of land or buildings, or engineering operations, other than those in accordance with PPG2, the Regional Spatial Strategy and other relevant policies contained within this Core Strategy and wider LDF. Paragraph 3.7 of PPG2 states that *"with suitable safeguards, the re-use of buildings should not prejudice the openness of Green Belts, since the buildings are already there. It can help to secure the continuing stewardship of land, especially by assisting farmers in diversifying their enterprises, and may contribute to the objectives for the use of land in Green Belts."* Paragraph 3.8 of PPG2 lists criteria identifying when the re-use of buildings inside a Green Belt is not inappropriate development. These criteria do not automatically rule out the re-use of rural buildings for economic development. Furthermore, PPG2 identifies the positive role of the Green Belt in fulfilling a variety of objectives, including the provision of access into the countryside from urban areas, opportunities for outdoor sport and recreation activities and the retention and enhancement of landscapes. The development of green infrastructure networks will facilitate this role (see Core Policy 5: Sustainable Design and Construction).
- 5.35** Annex C of PPG2 makes specific provision for local planning authorities to identify sites of substantial scale as 'Major Developed Sites' within the Green Belt. In the Tunbridge Wells Borough Local Plan 2006, three sites were identified under this category:
- Pembury Hospital, Pembury: a new replacement hospital on the Pembury site is currently under construction with a planned completion date by the end of 2011;
  - Kent College, Pembury; and
  - Holmewood House School, Langton Green.
- 5.36** All three sites had an identifiable and substantial core of permanent buildings above 7,500sqm floorspace, a threshold considered by the Local Plan Inspector to appropriately reflect local circumstances. They remain the only three sites of this scale within the Green Belt in the Borough and it is unlikely that new developments of this scale within the Green Belt will be allocated or permitted in the period to 2026. No additions to the Major Developed Sites within the Green Belt are therefore proposed. Within such sites, however, limited infilling or redevelopment may be acceptable, offering the opportunity for environmental improvement without adding to its impact upon the openness of the Green Belt and the purposes of its designation. Planning proposals for development at these identified Major Developed Sites will be considered on their merits and will be assessed according to the criteria set out in national and local planning policies.

### Rural Fringe (long-term land reserve)

- 5.37** The Rural Fringe strategy was initially established in the Royal Tunbridge Wells and Southborough Local Plan 1988, with the purpose of identifying and safeguarding land to meet probable longer-term development needs as required by PPG2. The Local Plan 1988 identified six Rural Fringe sites, which have been carried forward in successive Local Plans to the 2006 Local Plan. They are defined on the Proposals Map.
- 5.38** The Borough Council will maintain a land reserve as Rural Fringe to extend beyond the Plan period. The existing Rural Fringe sites will not, however, have been excluded from consideration in the first SHLAA and could, therefore, be considered for future development to form part of the Borough's development land supply. The suitability, availability and viability of Rural Fringe sites will be assessed against that of other greenfield sites contiguous with the LBD. In accordance with Core Policy 1: Delivery of Development, Rural Fringe sites, like other sites outside the LBD, will not be released unless they are allocated in a DPD.
- 5.39** In circumstances where there is a need to utilise existing Rural Fringe sites, the SHLAA, together with the Landscape Character Assessment and Capacity Study 2009, will help identify suitable broad areas to inform the designation of replacement Rural Fringe sites through the Allocations DPD to replenish the long-term land reserve.

## Tandridge Borough Council Core Strategy (adopted October 2008)

### Spatial Strategy (Location of Development)

- 6.1** In line with the South East Plan this strategy proposes that the majority of development will take place within the existing built up areas of Caterham, Warlingham, Whyteleafe, Oxted and Hurst Green by seeking to make best use of previously developed land (brownfield) within those areas. Development within the villages may be permitted to meet local needs. The strategy therefore acknowledges the importance of the Green Belt as a way of keeping land open and preventing the outward spread of London and existing built up areas from coalescing. No changes are currently proposed to the boundaries of the Green Belt. The strategy requires that the majority of new development is provided in locations that minimise the need to travel, in particular the need to travel by car. The strategy will be delivered by directing (in general) new development to the existing built up areas where there is a greater range of services and access to relatively better public transport.
- 6.2** However the policy on Housing Provision CSP2 does recognise that if it is not possible to allocate sufficient land without encroaching into the Green Belt, growth will be directed to land immediately adjoining built up areas, i.e. which are within the Green Belt. The precise location of such land would depend on its accessibility to services, public transport and other infrastructure, in other words the most "sustainable locations". Because of the relatively limited requirement for additional housing in Tandridge set out in the South East Plan it is not considered necessary in this Core Strategy to identify any strategic sites for housing. The Sustainability Appraisal considered the options of directing development to the built up areas by making best use of previously developed land or allocation sites of different sizes on the edge of the built up areas. It also considered the relative sustainability of the different built up areas in the district; it indicates that there are no significant differences in the sustainability of those areas. The Key Diagram shows the broad locations where development will take place; it also shows the villages (Larger Rural Settlements) where development to meet local needs may be permitted together with the Green Belt and public transport routes. No hierarchy of the built up settlements is proposed as there are no significant differences between the areas in terms of sustainability. There is no proposal to change the functions of the built up settlements either. Caterham Valley and Oxted town centres are the principal service centres and do not compete with each other. Other centres fulfil more local needs (see Section 19).
- 6.3** The Green Belt, the built up areas, the Larger Rural Settlements, and the Green Belt Settlements boundaries are defined on the Tandridge District Local Plan 2001 Proposals Map. However, Local Plan policies RE3, RE4 and RE5 will be superseded by the Core Strategy so the Green Belt Settlement boundaries will no longer apply. All of these boundaries will be reviewed in the Site Allocations DPD, which will be accompanied by a new proposals map showing the reviewed boundaries.
- 6.4** Development appropriate to the needs of rural communities in relation to Category 2 settlements, as referred to in policy CSP1, will be assessed as follows:
- where infilling is proposed on existing residential land it should be of a scale appropriate to the size and character of the settlement and the extent to which it would not reinforce unsustainable patterns of travel;
  - where infilling comprises the redevelopment of non-residential land it would assist in delivering the objective making the best use of previously developed land;
  - the proposed development would assist in meeting the need for affordable housing, particularly to meet local needs; and
  - the proposed development would assist in the retention or enhancement of community facilities.
- 6.5** The Council will apply the following tests when considering if further sites should be identified as Major Developed Sites in the Green Belt.
1. Identify any sites that are major/substantial and developed.
  2. Consider whether there is scope for infilling of the identified sites without adding to the impact on the openness of the Green Belt and the purposes of including land within it.
  3. Consider whether there is scope for the complete or partial redevelopment of the identified sites which would result in an environmental improvement.
  4. Consider if there are any particular environmental, infrastructure or sustainability constraints which would militate against the site being designated as a MDS.

### Policy CSP 1

#### Location of Development

In order to promote sustainable patterns of travel and in order to make the best use of previously developed land, development will take place within the existing built up areas of the District (the Category 1 settlements listed below) and be located where there is a choice of mode of transport available and where the distance to travel to services is minimised subject to the third paragraph of this policy. There will be no village expansion by amending the boundaries of either the Larger Rural Settlements or Green Belt Settlements. All the settlement boundaries will be reviewed in the Site Allocations DPD and the accompanying Proposals Map. Development appropriate to the needs of rural communities will be permitted in the Larger Rural Settlements and Green Belt Settlements (the Category 2 settlements listed below) through infilling and on sites

allocated for affordable housing. There will be no expansion of Woldingham (also a Category 2 settlement); saved policy BE7 "Woldingham" of the Tandridge District Local Plan 2001 will continue to apply to development within the settlement boundary until this is replaced by a policy in a Development Control DPD.

There will be no change in the Green Belt boundaries, unless it is not possible to find sufficient land within the existing built up areas and other settlements to deliver current and future housing allocations. Such changes will only take place at sustainable locations as set out in Policy CSP2 whilst having regard to the need to prevent built up areas from coalescing. Any changes will be made through a Site Allocations Development Plan Document and the accompanying Proposals Map. Where there is a requirement to allocate green field sites the preference will be to find a number of sites to disperse the impact of development; the location of such sites will need to take into account existing and proposed infrastructure and service provision.

#### **Chelmsford Core Strategy (Adopted February 2008)**

##### **POLICY CP5 - CONTAINING URBAN GROWTH**


Urban growth will be contained by defining the physical limit of the urban areas of Chelmsford and South Woodham Ferrers and the Defined Settlements.

Beyond the Urban Areas and Defined Settlements, the Metropolitan Green Belt as defined on the Proposals Map will be protected in accordance with national and regional policy. Planning permission for development in the Metropolitan Green Belt will be refused other than in the circumstances identified in the relevant Core and Development Control policies. Within the rural areas of the Borough beyond the Metropolitan Green Belt as defined on the Proposals Map, the Borough Council will protect and enhance the character and openness of the countryside. This will be achieved by the restriction of inappropriate development in a rural area. Planning permission for development within the rural areas beyond the Metropolitan Green Belt will be refused other than for the categories of development expressly identified in the relevant Core and Development Control policies.


# Local Green Space Toolkit Application

## Site 2

### Westdown Gardens

1	<b>General Information</b>	Tick if relevant evidence provided
1.1	Name and address of site <i>Some sites have several names and all known names should be given</i>	
	<b>Westdown Gardens, Cheltenham GL52 6AX</b>	
1.2	Site location plan <i>The plan can be at any scale, but must show the location and boundaries of the site. Please indicate the scale.</i>	
		
1.3	Organisation or individual proposing site for designation <i>This will normally be a Town or Parish Council or a recognised community group</i>	
	<b>Fairview Community Association (FCA)</b>	
1.4	Ownership of site if known	



	Information on land ownership can be obtained from the <u>Land Registry</u> . Some land parcels are not registered however local people may know the owner.	
	<b>Private Owner, unknown and absent</b>	
1.5	Is the owner of the site aware of the potential designation? Do they support the designation? (Sites may be designated as Local Green Spaces, even if there are objections from the site owners)	
	<b>Not known</b>	
1.6	Photographs of site	
		
1.7	Community served by the potential Local Green Space <i>i.e. does the site serve the whole village/town or a particular geographic area or group of people?</i>	
	<b>The land is situated at the junction on Westdown Gardens and Hewlett Road. It is a densely populated residential area with no industry in close proximity. It serves up to 500 residents in immediate streets including Brighton Road, Westdown Gardens itself and Hewlett Road.</b>	
2	<b>Planning History</b>	
2.1	Is there currently a planning application for this site? If permitted, could part of the overall site still be used as a Green Open Space? for further information please contact Cheltenham Borough Council <u>Planning Applications</u> team	
	<b>None known about</b>	
2.2	Is the site allocated for development in the existing Development Plan, emerging Joint Core Strategy, Cheltenham Plan or a Neighbourhood Plan? If allocated, could part of the overall site still be used as a Green Open Space? For further information please contact Cheltenham Borough Council <u>Planning Policy</u> team	
	<b>Development plans unknown.</b>	
3	<b>Size, scale and “local nature” of proposed Local Green Space</b>	
3.1	Area of proposed site	
	<b>Approx. 0.07 hectares, 33.1 meters in length</b>	
3.2	Is the site an “extensive tract of land”? (Extensive tracts of land cannot be designated as Local Green Space)	

	<i>e.g. how large is it in comparison to other fields; groups of fields; areas of land in the vicinity etc.? Does the site “feel” extensive or more local in scale?</i>	
	<b>No.</b>	
3.3	Is the proposed site “local in character”? <i>e.g. does the site feel as though it is part of the local area? And why? How does it connect physically, visually and socially to the local area? What is your evidence?</i>	
	<b>The site is very local and offers a green space with shrubs and trees in an otherwise busy and built up area</b>	
4	<b>Need for Local Green Space</b>	
4.1	Is there a need for a local green space in this location? <i>e.g. is there a shortage of accessible greenspace in the area? Is there a village needs survey or parish plan that provides evidence of that need. Further information – Natural England (<a href="#">Accessible Natural Greenspace Standard</a>)</i>	
	<b>There are no other green spaces in the near vicinity. The nearby, large, cricket ground at the far end of Westdown Gardens is separated by a substantial brick wall and is not directly accessible to the public from here. It is a five-minute walk away. Otherwise, significant public areas such as Pittville and Sandford Parks are at least 10 minutes away in other areas. The CBC green space audit from 2008 showed All Saints had less green space per head than any other ward (Steve Jordan (CBC) e-mail 17<sup>th</sup> December 2014 as attached)</b>	
5	<b>Evidence to show that “the green space is in reasonably close proximity to the community it serves” <i>Please indicate what evidence you have provided against each point.</i></b>	
5.1	How far is the site from the community it serves? Is the site within 2km of the local community? <i>Possible evidence – a map to show that distance</i>	
	<b>The site is adjacent to the community it serves</b>	
5.2	Are there any barriers to the local community accessing the site from their homes? <i>e.g. railway line; main road Possible evidence – a map to show any potential barriers and how those can be overcome.</i>	
	<b>There are no barriers to stop the local community from accessing the site</b>	
6	<b>Evidence to show that the green area is “demonstrably special to a local community” <i>Please indicate what evidence you have provided against each point.</i></b>	
6.1	Evidence of support from Parish or Town Council <i>e.g. letter of support; Council minutes</i>	
	<b>There is no Parish or Town Council</b>	
6.2	Evidence of support from other local community groups or individuals. <i>e.g. letters of support; petitions; surveys etc.</i>	
	<b>Introduced and listed by local residents attending the Fairview Community Association meeting on 4th December as in the attached :</b>	

	<b>Initial assessment matrix - research by communities Fairview_4 December 2014</b>	
6.3	Evidence of support from community leaders <i>e.g. letters of support from Ward Members; County Councillors; MP etc. Further information on these contact details – <u>Cheltenham Borough Council, Gloucestershire County Council, House of Commons</u></i>	
	<b>Initial assessment matrix reviewed and appended to Steve Jordan (CBC) e-mail 17<sup>th</sup> December 2014 as attached</b>	
6.4	Evidence of support from other groups <i>e.g. letters of support from organisations such as Campaign to Protect Rural England; local amenity societies; local schools etc.</i>	
	<b>None known about</b>	
<b>7</b>	<b>Evidence to show that the green area “holds a particular local significance, for example because of its <u>beauty</u>,” (if applicable) <i>Please indicate what evidence you have provided against each point.</i></b>	
<b>7.1</b>	<b>Is this criterion relevant to this site?</b>	
	<b>Yes.</b> <b>The area is grassed and has thoughtfully planted trees. It is beautiful in as much as it is green, well maintained and attractive, especially when the site’s trees are in blossom.</b> <b>This area “holds a particular local significance” for the people who live there and use the site as an open green space in an otherwise busy and built up area.</b>	
7.2	Describe why the community feels that the site has a particular local significance for its beauty.	
	<b>This site sits within a very busy area in terms of traffic and property and is unique in its character. It is well maintained with young but well established and beautiful trees.</b>	
7.3	Site visibility <i>e.g. is it easy to see the site from a public place? Are there long- distance views of the site? Are there views of the site from any key locations?</i>	
	<b>The site can be clearly seen from the public road and from nearby houses.</b> <b>It provides a clearly-visible, open space adjacent to the Westdown Gardens bus stops on either side of the road. As such it is an informal, safe waiting area and easily-identified, destination for bus passengers.</b>	
7.4	Is the site covered by any landscape or similar designations? <i>e.g. Area of Outstanding Natural Beauty; Conservation Area; Special Landscape Area</i> <i>Further information – <u>Cheltenham Borough Council; Natural England;</u></i>	
	<b>Yes, it lies within the 30 April 2009 CBC Central Conservation Area</b>	
7.5	Is the site (or the type of site) specifically mentioned in any relevant landscape character assessments or similar documents? <i>e.g. Cotswolds AONB landscape character assessment. Further information – <u>Cheltenham Borough Council; Natural England; Cotswolds Conservation Board</u></i>	
	<b>No</b>	
7.6	Does the site contribute to the setting of a historic building or other special feature?	

	<b>Some of the neighbouring property is late-Victorian, terraced housing. It offers green space and a safe area around, otherwise, very small property back gardens.</b>	
7.7	Is the site highlighted in literature or art? <i>e.g. is the site mentioned in a well-known poem or shown in a famous painting?</i>	
	<b>Not known</b>	
8	<b>Evidence to show that the green area “holds a particular local significance for example because of its <u>historic significance</u>” (if applicable)</b> <b><i>Please indicate what evidence you have provided against each point.</i></b>	
8.1	<b>Is this criterion relevant to this site?</b>	
	<b>No</b>	
8.2	Are there any historic buildings or remains on the site? <i>e.g. listed buildings; scheduled ancient monuments ; registered parks and gardens; war memorials; other historic remains or structures.</i> <i>Further information – <u>Cheltenham Borough Council</u>; <u>English Heritage</u>; <u>Gloucestershire Historic Environment Record</u>; <u>Gloucestershire Archives</u>; <u>local history society</u>;</i>	
	<b>No</b>	
8.3	Are there any important historic landscape features on the site? <i>e.g. old hedgerows; ancient trees; historic ponds or historic garden features</i> <i>Further information – <u>Cheltenham Borough Council</u>; <u>English Heritage</u>; <u>Gloucestershire Historic Environment Record</u>; <u>local history society</u></i>	
	<b>No</b>	
8.4	Did the site play an important role in the historic development of the village or town? <i>e.g. the old site of the town railway station; the old garden for the manor house etc.</i>	
	<b>Not known</b>	
8.5	Did any important historic events take place on the site?	
	<b>Not known</b>	
8.6	Do any historic rituals take place on the site? <i>e.g. well-dressing; maypole dancing etc.</i>	
	<b>Not known</b>	
9	<b>Evidence to show that the green area “holds a particular local significance, for example because of its <u>recreational value</u> (including as a playing field)”, (if applicable)</b> <b><i>Please indicate what evidence you have provided against each point.</i></b>	
9.1	<b>Is this criterion relevant to this site?</b>	
	<b>YES. This area holds a particular local significance because it is a green open space in an otherwise busy and built up area. It has a recreational value although it would not be suitable as a children’s play area because of its proximity to the busy road. It can and is used as a meeting place, for dog walking and as a “green lung in a built up area”.</b> <b>Some of the neighbouring property is period terraced housing. It offers green space and a safe area around, otherwise, very small property back gardens.</b>	
9.2	Is the site used for playing sport?	



	<i>If so what sport? How long has it been used for sports provision? Is this sports provision free or is a club membership required? Further information – <u>Sport England</u></i>	
	<b>It is not suitable for sport because of its proximity to the road.</b>	
9.3	Are the public able to physically access the site? <i>e.g. are there any public rights of way across the site? Or adjacent to the site? Has access been allowed on a discretionary basis? Is there public access to the whole site or only part? Is there good disabled access to the site? (A site can still be designated even if there is no public access.)</i> <i>Further information – <u>Gloucestershire County Council</u></i>	
	<b>The area is totally accessible to the public</b>	
9.4	Is the site used by the local community for informal recreation? And since when? <i>e.g. dog walking; sledging; ball games etc.</i>	
	<b>The area is used for community recreation/gatherings and dog walking. It is not suitable for sports because of its proximity to the road.</b>	
10	<b>Evidence to show that the green area “holds a particular local significance, for example because of its <u>tranquillity</u>” (if applicable) <i>Please indicate what evidence you have provided against each point.</i></b>	
10.1	<b>Is this criterion relevant to this site?</b>	
	<b>Yes. This area holds “a particular local significance” because of its relative tranquillity. It is close to a busy road but it is a piece of well-maintained grassland with trees which offer an environmental respite.</b>	
10.2	Do you consider the site to be tranquil? <i>e.g. are there any roads or busy areas close by?</i>	
	<b>No. The site could not be described as tranquil because of its proximity to a busy road but it is green and attractive.</b>	
10.3	Is the site within a recognised tranquil area? <i>e.g. within the <u>Campaign to Protect Rural England</u>’s tranquillity maps</i>	
	<b>No</b>	
11	<b>Evidence to show that the green area “holds a particular local significance, for example because of the <u>richness of its wildlife</u>”; (if applicable) <i>Please indicate what evidence you have provided against each point.</i></b>	
11.1	<b>Is this criterion relevant to this site?</b>	
	<b>No</b>	
11.2	Is the site formally designated for its wildlife value? <i>e.g. as a site of special scientific interest; a key wildlife site etc.</i> <i>Further information - <u>Natural England</u>; <u>Gloucestershire Centre for Environmental Records</u></i>	
	<b>No</b>	
11.3	Are any important habitats or species found on the site? <i>e.g. habitats and species listed in the UK priority habitats and species lists or Gloucestershire Biodiversity Action Plans or protected species or on the red/amber lists of birds of conservation concern.</i>	

	<i>Further information - <u>Natural England</u>; <u>Gloucestershire Centre for Environmental Records</u>; <u>National Biodiversity Network</u>; <u>RSPB</u></i>	
	<b>Not known but doubtful</b>	
11.4	What other wildlife of interest has been found on the site? <i>Further information - <u>Natural England</u>; <u>Gloucestershire Centre for Environmental Records</u>; <u>National Biodiversity Network</u>;</i>	
	<b>This would not be an area significant for its wildlife although it would provide an area of safety for animals, especially birds, as it is in the middle of a built up area.</b>	
11.5	Is the site part of a long term study of wildlife by members of the local community? <i>e.g. long-term monitoring of breeding birds.</i>	
	<b>No knowledge of any such study.</b>	
12	<b>Evidence to show that the green area “holds a particular local significance, for <u>any other reason</u>”; (if applicable) <i>Please indicate what evidence you have provided against each point.</i></b>	
12.1	<b>Is this criterion relevant to this site?</b>	
	<b>This is an area much loved and cherished by the local community as it is an attractive green space in a built up area. It is a safe escape from the busy road. It has a history of being considered at 2011/12 Fairview Community Association meetings for preservation and enhancement of its recreational value.</b>	
12.2	Are there any other reasons why the site has a particular local significance for the local community?	
	<b>This is the only green space in the close proximity of the community. Much of the area is dominated by high-density housing and the busy Hewlett Road.</b>	

## Appendix 1

From: [Steve.Jordan@cheltenham.gov.uk](mailto:Steve.Jordan@cheltenham.gov.uk)  
 To: *address supplied*  
 Subject: RE: Green spaces assessments  
 Date: Wed, 17 Dec 2014 16:32:22 +0000

Have added some details on why the sites picked are special - let me know what you think.

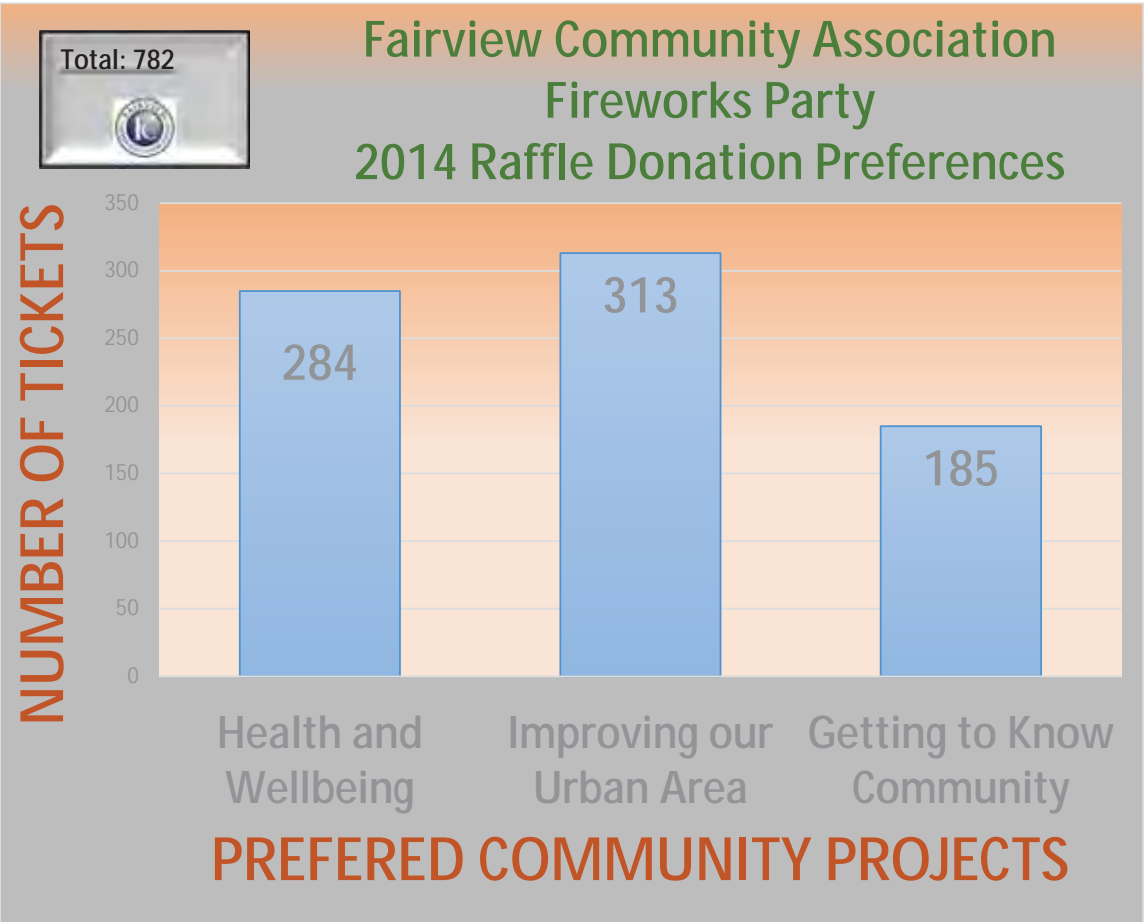
Not sure if/when the owners of the land get involved. Most are CBC so no problem with those but I guess the schools and church may be interested at some point – presume you can cover the cricket club.

I had a look at the CBC green space audit from 2008 which showed All Saints had less green space per head than any other ward – shows why each site is important! It also listed a couple of sites we didn't. Both are in the 'new' bit of FCA area. They were The Grove (presume the green bit in the middle of the turning circle at the end of the cul-de-sac) and Hales Close (not really sure what that refers to unless the green verge on the left hand side). Having said that, I'm happy to go with what we've got.

As mentioned I think that's all we need at this stage. Are you happy to go with this or would you like to meet/discuss?

Thanks, Steve.



Appendix 2





# Local Green Space Toolkit Application

## Site 3

### Witcombe Place

1	<b>General Information</b>	<b>Tick if relevant evidence provided</b>
1.1	Name and address of site <i>Some sites have several names and all known names should be given</i>	
	<b>Witcombe Place, Cheltenham GL52 2SP</b>	
1.2	Site location plan <i>The plan can be at any scale, but must show the location and boundaries of the site. Please indicate the scale.</i>	
	<p><b>This large, green island includes two small areas divided by a little-used access road.</b></p> <div>   </div>	
1.3	Organisation or individual proposing site for designation	



	<i>This will normally be a Town or Parish Council or a recognised community group</i>	
	<b>Fairview Community Association (FCA)</b>	
1.4	Ownership of site if known <i>Information on land ownership can be obtained from the <u>Land Registry</u>. Some land parcels are not registered however local people may know the owner.</i>	
	<b>Not known</b>	
1.5	Is the owner of the site aware of the potential designation? Do they support the designation? (Sites may be designated as Local Green Spaces, even if there are objections from the site owners)	
	<b>Not known</b>	
1.6	Photographs of site	
	 	
1.7	Community served by the potential Local Green Space <i>i.e. does the site serve the whole village/town or a particular geographic area or group of people?</i>	
	<b>The land is situated at the rear of a thriving primary school, St John's. It is also at the end of Witcombe Place - a no through road of private dwellings. Because of the busy Albion Street/Berkley Street ring road this land is mostly used by the school and local residents of Witcombe Place itself, St. John's Avenue and St. Anne's Road.</b>	

2	<b>Planning History</b>	
2.1	Is there currently a planning application for this site? If permitted, could part of the overall site still be used as a Green Open Space? for further information please contact Cheltenham Borough Council <u>Planning Applications</u> team	
	<b>None known about</b>	
2.2	Is the site allocated for development in the existing Development Plan, emerging Joint Core Strategy, Cheltenham Plan or a Neighbourhood Plan? If allocated, could part of the overall site still be used as a Green Open Space? For further information please contact Cheltenham Borough Council <u>Planning Policy</u> team	
	<b>The ring road is currently one way traffic which will change to two way traffic following the recent Gloucestershire County Council approval. At the 26 January 2015 meeting Council considered the recommendations of the TRO committee meeting which took place on 15 January. "The committee concluded that the Traffic Regulation Orders relating to the Cheltenham Transport Plan should be fully implemented". Development plans for this Witcombe Place space within this are unknown.</b>	
3	<b>Size, scale and "local nature" of proposed Local Green Space</b>	
3.1	Area of proposed site	
	<b>Both areas total approximately 0.4 hectares</b>	
3.2	Is the site an "extensive tract of land"? <i>(Extensive tracts of land cannot be designated as Local Green Space) e.g. how large is it in comparison to other fields; groups of fields; areas of land in the vicinity etc.? Does the site "feel" extensive or more local in scale?</i>	
	<b>The land is "stand alone" and is not adjacent to or near any other green land. It is local in scale</b>	
3.3	Is the proposed site "local in character"? <i>e.g. does the site feel as though it is part of the local area? And why? How does it connect physically, visually and socially to the local area? What is your evidence?</i>	
	<b>The site is very local and offers a green space with shrubs and trees in an otherwise busy and built up area. The area is grassed and has thoughtfully planted trees. It is very local in comparison with Sandford Park which is at least 5 minutes away across the busy London Road.</b>	
4	<b>Need for Local Green Space</b>	
4.1	Is there a need for a local green space in this location? <i>e.g. is there a shortage of accessible greenspace in the area? Is there a village needs survey or parish plan that provides evidence of that need.</i> <i>Further information – Natural England (<u>Accessible Natural Greenspace Standard</u>)</i>	
	<b>There are no other green spaces in the near vicinity. The CBC green space audit from 2008 showed All Saints had less green space per head than any other ward (Steve Jordan (CBC) e-mail 17<sup>th</sup> December 2014 as attached). Otherwise, significant public areas such as Pittville and Sandford Parks are, respectively, at least 10 and 5 minutes away in other areas and across major roads.</b>	
5	<b>Evidence to show that "the green space is in reasonably close proximity to the community it serves"</b>	