

Response to Inspector's Issues (ED009)

Representor Id: 215

Comment Ids: 1336, 1337

M1 - Evidence Base & Vision

SA-1 *Has the SA/SEA undertaken an assessment of reasonable alternatives for locally relevant policies and local (non-strategic) site allocations in the Cheltenham Plan? (ref SD017 Appendix VII)*

The tediously voluminous SA/SEA reports have not even attempted to assess the "reasonable alternatives" for the siting of a **Secondary school** to serve the whole Cheltenham area (including some environs), which GCC is currently targeting onto Leckhampton's sensitive greenfield (where it happens to own four fields) .

The only paragraph in the SEA to deal with the proposed Leckhampton Secondary school, **para. 6.25**, states (with my interjections in red) :

6.25 At a late stage of plan-making and assessment, Gloucester[shire] County Council advised the need for a secondary school and that the Leckhampton site was preferred.

This means that the proposed development changes from around 330 [an unsubstantiated try-on figure] dwellings to around 200-250 dwellings plus the school.

The implications for the overall findings of the SA are not significant: the quantum of housing remains sufficient that affordable units can be provided and maintains the major positive effects for SA objectives on housing for all; [landscape and LGS impact seem of no concern, only whether housing benefits remain] the provision of a new school will ensure that there is educational capacity for existing and new communities in the area into the longer term, thus confirming the likely positive effects for SA objectives on provision and access to services/facilities.

The JCS and other Plan Policies will ensure that there are no significant negative effects arising from the change of proposed development. [Unspecified Policies "ensure" nothing; landscape loss cannot be mitigated]

This is a typical example of SA's sanguine imprecision. It parrots the client's overbearing concern with the impact on housing numbers. The mere existence of "policies" does not remove all "significant" negatives.

V-2 *Is the wording of Vision Theme C para 2.9a) appropriate for Cheltenham?*

The wording of para 2.9a of Vision-Theme-C is fine for peerless Cheltenham's large, central "most complete Regency town" Conservation Area, and is also acceptable for the town's 'minor' detached outlying CAs.

However, Vision-Theme-A does need to be rewritten for realism of vehicular traffic viability, given this town's unusually deficient road network. (See my CLP submission.)

Further Comments

Overall, it is poor practice that the Inspector has been made to commit to a list of 'Issues' before CBC has published its Response Report, as 'promised' diagrammatically on its CLP website.

CBC is craftily doing a minimum, confidently believing that an Inspector may only be able to identify massive Unsoundness, and thereby every other Objection can remain unremedied and even unresponded-to, (effectively ignored).

Evidence however remains missing, namely:

- (1) the Secondary schooling 'Need' equation and data covering the whole interdependent Cheltenham and Tewkesbury 'school planning areas', (see **Appendix-3** for Fol data prized out via the ICO);
- (2) a layout showing how even so many as "200" houses could be accommodated acceptably within the full extent of plot MD5 (Shurdington Road, Leckhampton) with no land taken by a school;
- (3) a layout of the full landscape impact of the re-sited Secondary school, for which GCC now intends soon to give itself permission wholly inside the JCS-designated LGS fields;
- (4) Cheltenham's draft input for a properly "immediate" Review of this town's unique 'Retail hierarchy' and the updating of its Retained set of detailed Cheltenham-specific Retail Policies, (see Q1 and Summary in my 'JCS Review' submission, **Appendix-4** attached);

The CLP Examination should ensure that the above evidence is forthcoming, urgently.

In the absence of this evidence, and time to critique it, this Examination should pause, not be hastened (as it is running much ahead of the other two JCS Districts).

The value of PINS is enhanced if its reports do indicate inferior proposals, i.e. scheme choices which are probably not "the most appropriate" solution and which would do harm that is avoidable.