

CHELTENHAM LOCAL PLAN 2011 – 2031 EXAMINATION

Matter 3: Housing and mixed use development

Representor ID 093; Comment No 389

As earlier comments made clear, CPRE's principal concern is the proposal for a new secondary school off Kidnappers Lane in Leckhampton.

The Pre-examination JCS proposed an urban extension at Leckhampton. However, this was removed as unsound by the Inspector who, in her October 2017 Final Report paragraph 185, stated:

“The strategic allocations at North Churchdown (A4) and Leckhampton (A6) are unsound. However, a reduced local allocation could be made at Leckhampton in the forthcoming Cheltenham Local Plan, which should also designate Local Green Space within this area. Whilst I previously commented that an allocation in the order of 200 dwellings at Leckhampton might be reasonable, this was only an approximation and intended to indicate a scale below the strategic threshold for the JCS. The final figures should be based on a full assessment of the area to provide the evidence base to underpin an appropriate allocation.”

In line with the JCS, the Cheltenham Plan proposes provision of 250 houses adjacent to the A46, Shurdington Road.

While the JCS was undergoing Examination, in 17 September 2015 Tewkesbury Borough Council approved a development of 377 dwellings on land which had been part of the Leckhampton strategic allocation at Farm Lane on the boundary with Cheltenham Borough. This was notwithstanding strong objections from Cheltenham Borough Council and the considerable reservations of the JCS Inspector (in her Preliminary Findings of December 2015, paragraphs 51 – 57 and subsequent criticism in her Interim Findings of May 2016 paragraphs 112 – 115). These dwellings are now well under construction. Taken together with the 250 proposed in the Cheltenham Plan, the eventual number of new homes in the area would be 527 dwellings, ie over the threshold set for a JCS strategic allocation and roughly half the number in the Leckhampton strategic extension rejected as unsound by the JCS Inspector.

A major concern regarding development of the Leckhampton/Shurdington area has long been one of traffic congestion. This is already considerable at peak times and will only get worse with the occupation of both the new housing under construction and that planned.

In this respect, it is pertinent to note that, over a year before the Farm Lane development was approved, an application by Bovis Homes to build up to 650 dwellings together with associated social and retail facilities and was refused by Cheltenham Borough Council. This application was subject to an appeal determined by the Secretary of State (PINS Reference: APP/B1605/W/14/3001717).

The appeal considered in great detail the pros and cons of the proposed development before concluding that its impact upon traffic and the landscape would be unacceptable. A copy of

the Secretary of State's conclusions, in his letter dated 5th May 2016 dismissing the appeal, is below at Annex.

Against this background, it is hardly surprising therefore that together with others, CPRE now questions the soundness of siting a large secondary school off Kidnappers Lane. The traffic impact from dropping off children will clearly be considerable and can only add to existing and future congestion in this sensitive area. The location to the east of Shurdington road means that turning traffic will interrupt the flow along this primary route into Cheltenham which is heavily congested at peak times

We therefore trust that in considering the need for a new secondary school the Inspector will assess whether the results of a full traffic impact analysis on the currently proposed site demonstrate that its impact can be satisfactorily be ameliorated. To be realistic, this needs to be carried out during the school term. Further the Inspector should assess whether the scale of the school buildings will be acceptable in this sensitive location adjacent to the Cotswolds Area of Outstanding Natural Beauty.

ANNEX

The Secretary of State's conclusions – Bovis appeal, 5th May 2016 (PINS Reference APP/B1605/W/14/3001717)

“Overall conclusions and planning balance

29. The Secretary of State agrees with the Inspector's overall conclusions at IR299-310.

30. The Secretary of State concludes that granting permission for the appeal scheme would be contrary to the development plan overall due to the severe residual cumulative transport impacts and through the loss of a locally valued landscape (IR300-301). He has therefore gone on to consider whether there are any material considerations that indicate the proposal should be determined other than in accordance with the development plan.

31. Due to the lack of a five year supply of deliverable housing sites the relevant development plan policies for the supply of housing are out of date. Therefore, in line with the presumption in favour of sustainable development at paragraph 14 of the Framework, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.

32. The residual cumulative transport impacts of development would be severe, in conflict with Framework paragraph 32. The development would prejudice the possible designation of Local Green Space, in conflict with Framework paragraph 76, and the guidance indicates that allowing the appeal would be premature in such circumstances. Though not designated, the site is clearly a locally valued landscaped which paragraph 109 of the Framework states should be protected. The Secretary of State agrees with the Inspector that all three paragraphs in the Framework indicate that development should be restricted and, in the circumstances of this case, that the appeal should be dismissed (IR305).

33. Finally, in considering the balance of planning considerations in this case, the Secretary of State agrees with the Inspector's assessment at IR306-309. Substantial though some of the benefits are, notably in terms of boosting housing supply, the Secretary of State considers that the sum of adverse impacts would significantly and demonstrably outweigh the benefits when assessed against the policies in this Framework taken as a whole.

34. For the above reasons the Secretary of State finds no reason to determine the appeal other than in accordance with the development plan.“