

## Response to Inspector's Issues (ED009)

Representor Id: 215

Comment Id: 1340

### M3 - Housing

**Q2** *Does the allocation of any of the sites under Policy H1 or H2 affect the soundness of the CP?*

A figure of "250" houses in the **MD5** land area is excessive and unjustified.

Before and throughout the Consultation, and then during the long subsequent delay before the CLP's Submission (completely unchanged), CBC neither ventured nor obtained for publication any layout of how the JCS Inspector's "200" units could conceivably be arranged and achieved acceptably to the noted "Escarpment views" and other constraints, let alone be increased to "250" or "330" or "370", which are nonsense/spin figures. Where is any reasoned evidence for this furtive uplift ?

The JCS verdict and the major Leckhampton-650 Appeal decision reports confirm that Leckhampton cannot sustain strategic-scale development (for which the JCS used roughly 450 units as cut-off).

However in parallel with the JCS Examination, Tewkesbury BC was motivated to approve 377 houses on its '**Site SD2**' (for Redrow, at the top of Farm Lane, Leckhampton), a site which the JCS Inspector ruled to be unwise but could not stop.

If now as many as 200 units were to be allowed at Site MD5, then the Leckhampton total would be approaching the 650 which the Secretary of State agreed would produce "severe" traffic impact on the A40-South (Shurdington Road). At least half of the SD2 houses are likely to drive down Kidnappers Lane to access their nearest large town (Cheltenham) or to reach M5-Junction-11 (via Up Hatherley Way and Arle Court).

**Q5** *Would it be appropriate to allocate additional housing sites in the CP in order to provide more choice and help to ensure that the target figure of 1,011 dwellings is met?*

There should now be no "additional allocations" for Cheltenham, which (markedly unlike the other two JCS Districts of Tewkesbury and Gloucester) met its JCS Housing target in full, despite being the District which is most constrained/encircled by sensitive landscapes (AONB; remaining Green Belt; and designated 'valued landscapes').

Any further allocations (any larger than tens of houses) would simply facilitate the cherry-picking of sites by developers. The most profitable sites, notably those on the more landscape-sensitive SouthWestern edge of Cheltenham, would jump ahead to be destroyed first (as Site SD2 was), and the less profitable sites like the 'strategic' NorthWest and West urban extensions would continue to dawdle.

The limited pool of national housebuilders/developers is quite capable of phasing its build urgency across multiple sites and Districts, to secure maximum options and profit, regardless of unwise and avoidable landscape harm.

Instead of facilitating more site "choice" for developers (for their inevitable cherry-picking) the CLP should ask why Cheltenham's strategic allocations are stalled, and seek disclosure of precisely what evidence (if any) has been submitted to Highways England during the past two years from Bloor-Persimmon to prevent HE imposing their repeated six-months 'Holds' on the NorthWest-UE planning application (and probably also discouraging progress on a now slipped WestCheltenham-UE planning application).

If CBC officers cannot restrain their numbers-chasing, as they ought to for an environmentally constrained, historic town which managed to meet its JCS Housing target in full (unlike TBC and Gloucester City), then officers need to look first to Cheltenham's Northern edge (far less distant from the town centre) where the JCS Inspector ruled that some further greenfield land could be removed from Green Belt, notably at 'Morris Hill' off Swindon Lane; development there could contribute to funding a more viable 'northern ring road' for Cheltenham, to cross the awkward Birmingham-to-Bristol railway mainline, replacing both the level-crossing on Swindon Lane and the low under-bridge on Hyde Lane which is the vital connection to **Bishops Cleeve** cum Woodmancote (Cheltenham's satellite townlet) from the elongated '**Severn Vale Conurbation**' (Cheltenham-Churchdown-Gloucester-Quedeley).

**Q6** *Is there adequate justification for the siting of a school within the Leckhampton allocation (MD5)?*

The GCC/CBC officers should not be allowed to evade answering this question by saying that the school has recently been slipped outside the MD5 boundary and wholly into the JCS-recommended area of 'Local Green Space' (LGS).

There is no justification for siting this school anywhere in South Cheltenham, where more Secondary schools are already located, where it would be too close to the town's largest Secondary (Bournside), and where it would be over-providing in the quadrant of the town where pupil demand from population and housing growth is least.

The sole reason for targeting Leckhampton's greenfield is GCC's opportunism from owning four fields inside the JCS-approved LGS area, which was a painstaking verdict (which GCC continues to flout).

For CBC, this Secondary school is not a "Duty to Cooperate" matter requiring "hands-off" acceptance of another District's request regardless of its reasoning. Therefore, the CLP should examine both the Secondary school's local need and its location, and GCC should be asked to present itself and its evidence for examination.

(As at the JCS Transport and Infrastructure (Schooling) sessions, any GCC appearance is likely to be thin and vague.)