

**Representations to the Cheltenham Plan
Land owner comment on behalf of Cape Homes
Land at Leckhampton Farm Court**

Introduction

Representations are made with regard to the Cheltenham Plan, and more specifically the email received from John Rowley dated 14 May 2019 seeking our view on the Inspector's Post Hearing advice note, and the suggested reassessment of the proposed LGS designations.

Within the Inspector's email [ED032] it is made clear that:

"With regard to the MD5 allocation, it is intended to hold discussions concerning the level of housing to be provided within the allocation and the potential for some LGS within the allocation. However, there is no indication that the landowners/housebuilders are to be included within those discussions. Can the Council please confirm that Miller Homes and Bovis Homes together with any owners of land within the allocation site will be included in the discussions."

And:

"Can the Council also confirm that landowners and those with relevant land interests will be included in discussions concerning the review of the LGS in Table 8. Again, it would be helpful to have SoCG between the various parties involved in the discussion of the most controversial designations."

Although I have now met with Mr Rowley, unfortunately it still remains unclear how the proposed allocations (residential, secondary school and LGS) at Leckhampton will now evolve or how/if it is intended to produce new assessments of the LGS. However, we are most grateful for the opportunity to comment on behalf of the owners of the land identified at Appendix A (edged green).

Comments on behalf of Cape Homes

With regard to the specific matter on which comments are sought, the land at Appendix A was originally part of the feasibility land for the proposed secondary school (see Appendix B which is an extract from the Local Education Authority feasibility assessment submitted as part of their Matter 3 written statement). The land at Appendix A is accessed via the original development at Leckhampton Farm Court and runs up to the Hatherley Brook. It is also immediately adjacent to the land now being considered from a new secondary school.

There was much discussion at the Examination regarding the definition of 'extensive tract of land'. I do not need to repeat what I have set out for other clients in this respect¹. Cape Homes is of the view that the comments made at the Examination will still remain even if the LGS is reduced in size marginally to accommodate the proposed secondary school. Indeed, paragraph 34 of the Inspector's Post Hearing Advice Note states that, "*I consider that the area of 39.31ha as currently proposed is not justified, and that a new assessment is required to identify an area which would meet the criteria in the NPPF and PPG.*" The removal of 5.9 hectares to accommodate a secondary school will still leave an area of 33.41 hectares. There is no doubt that, with reference to precedent on this matter, this is still an extensive tract of land.

SF Planning wishes to be involved in any new assessment and its methodology as recommended by Inspector Burden. It is also important that this new assessment should form part of the council's own evidence base to be published prior to any Main Modifications to the plan. It was interesting that at the Examination it was only third parties that were verbally seeking to support the LGS allocations; the Borough Council was not particularly involved in defending its own allocations in this regard. We call on Cheltenham Borough Council to take a more active and engaging role in the new assessment, and to involve land owners in its formulation.

It is also noted that Paragraph 34 of the Inspector's Post Hearing Advice Note states, "*LGS proposed within the Leckhampton area will be needed to serve existing and new residential development.*" However, at the risk of repeating what I specified at the Hearing on Matter 4, it is the case that paragraph 77 of the 2012 National Planning Policy Framework (NPPF) is clear that the designation should only be used 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.

To us, given that this requirement is written in the present tense, this requires evidence to be provided as to why a green area is special to an existing community; it cannot be used to allocate land as LGS for a future community. Indeed, evidence has to be provided and therefore the relevant community must already exist to provide that evidence. It is therefore suggested that it is in fact impossible to allocate LGS on the basis that it might be special to a future community as one doesn't yet know if the green area will or will not hold a significance for them in the future (and more importantly therefore no evidence can be provided to support an allocation for that community as it does not yet exist). I would therefore take the view that there is a risk of a flaw in the evidence base if LGS is allocated because it might be special to a future community (or in other words LGS to serve a new residential development).

In addition to the above, any LGS should be in reasonably close proximity to the community it serves. The land at Appendix A is not in reasonably close proximity to the wider existing residential Leckhampton area that has provided the evidence associated with the proposed Leckhampton LGS. Whereas the northern part of the proposed LGS is reasonably close (within 10s rather than 100s of metres).

¹ For example, please refer to the Hearing Statement for Mr and Mrs Jeffreys Representor ID: 576 for Matter 4

Paragraph 76 of the 2012 NPPF is also clear that LGS designations must be, "*capable of enduring beyond the end of the plan period.*" It is difficult to see how such an extensive LGS allocation will endure beyond the plan period. Given that Cheltenham is such a heavily constrained Borough already (with Green Belt to the west, north & south, and AONB to the east) it would be completely incapable of meeting its own needs in the future if the LGS remained as a roughly 33 hectare allocation. Or, it would have to look to allocate sites in much more sensitive environments such as the AONB.

Our position is that the land at Appendix A, and the whole 'southern' part of the proposed LGS should, at the very least, be removed from the proposed LGS allocation. This would then ensure that any remaining land to the north would then be:

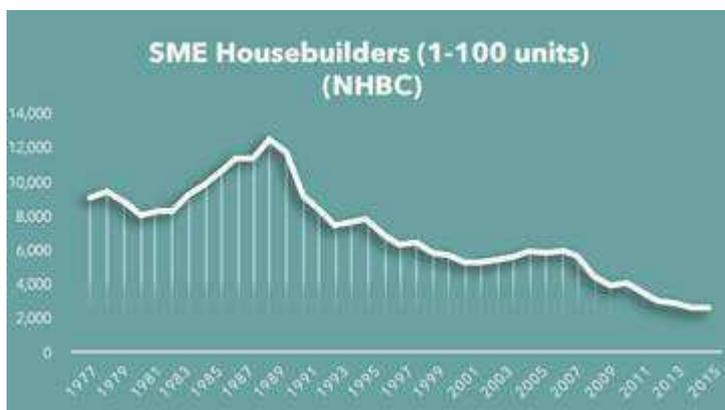
- A suitably sized area of land
- An area of land which is in reasonably close proximity to the community that has produced the evidence to support the allocation, and
- Is potentially special to that existing community.

This would then leave the land at Appendix A as land available for future housing.

Indeed, the Inspector's Post Hearing Advice Note also states, "*The land which is released could be considered for an increase in housing numbers.*" The land at Appendix A would round off the development nicely at this end of the school allocation (alongside Leckhampton Farm Court), which already has access from Farm Lane into the first phase of the original development, which was completed some years ago.

Furthermore, many of the sites allocated in the JCS and the Local Plan are for the benefit of the national house builders. Inclusion of the land at Appendix A would benefit a smaller local company, based in Leckhampton (rather than a national PLC type operator) and allow a much more bespoke development to take place.

The smaller to medium size sector has suffered since the recession, and there is little in the current version of the emerging Cheltenham Plan to address this issue. Research by the Home Builders Federation 'Reversing the decline of small housebuilders' (2017) has highlighted that the smaller to medium size house builder sector is falling behind to an unprecedented amount.

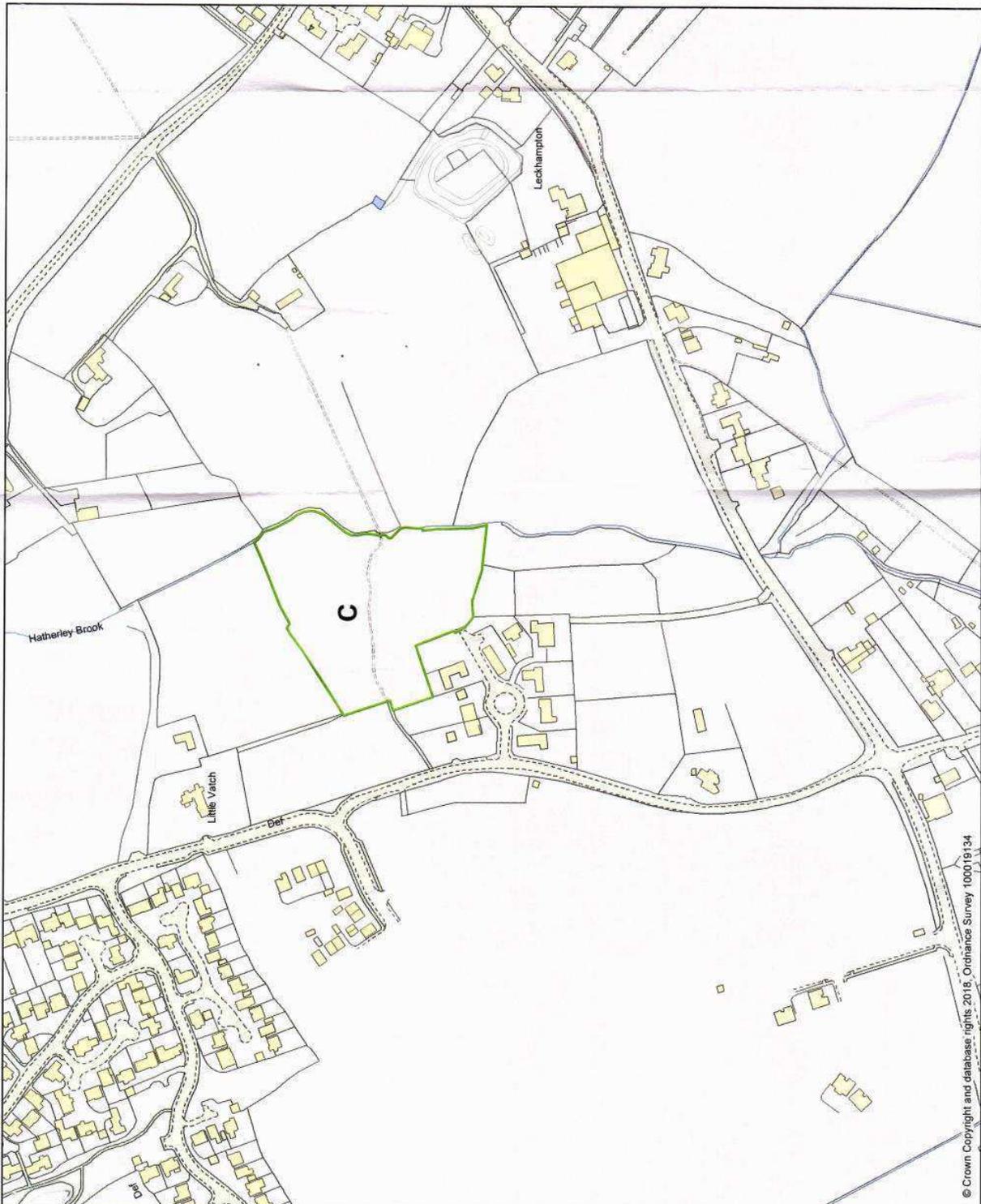


Number of smaller house builders

This is an opportunity to reassess the land at Leckhampton to result in more beneficial outcomes that will endure beyond the plan period. The land at Appendix A is immediately adjacent to the area being considered for the proposed secondary school, so it makes no sense to stifle its future potential (particularly as it is some distance from the Leckhampton community, and is in private ownership).

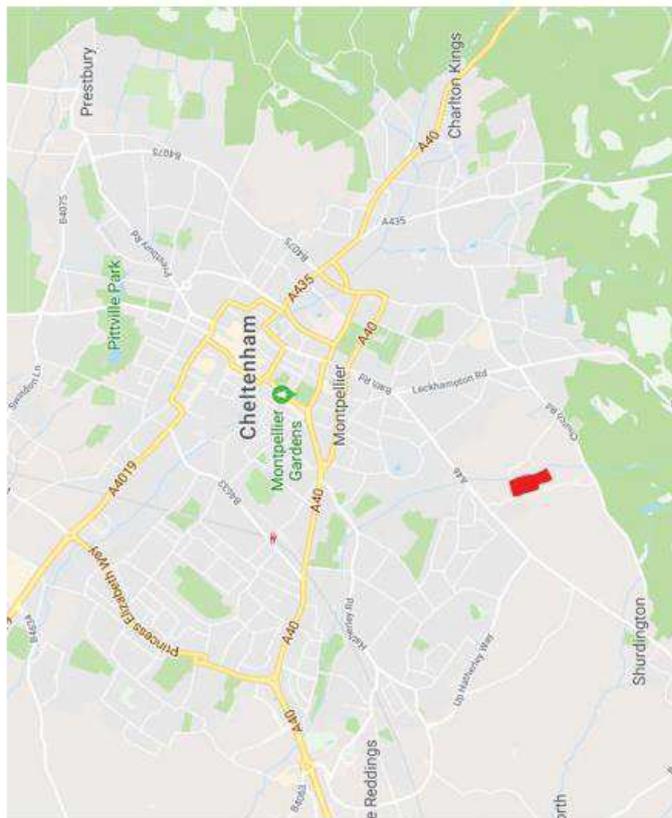
Appendix A

TITLE:	PROJECT: Possible sites for new school for Cheltenham	SITE: Site Plan	 LEGEND: DRAFT
			 C - Area - 13,787.6m ²
			 Gloucestershire <small>COUNTY COUNCIL</small> Asset Management and Property Services Shire Hall, Westgate Street, Gloucester GL1 2TG Tel: 01452 328809 www.gloucestershire.gov.uk
			DRAWN BY: briece SCALE: NTS@A3 DATE: 12/07/2018 DRAWING NO:
			You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form



2.0 Site Analysis

Site plans



The proposed site, indicated in red on the above map, is in the Leckhampton district and lies on the outskirts of South Cheltenham.



The full Feasibility Study covered parcels A & C, however **site B** is owned by Gloucestershire County Council and it was ultimately decided that this should be the development site.



Extract from the Feasibility statement for the LEA's Matter 3 written statement. The Cape Homes land is identified as 'Site C'

Date: 7 June 2019

John Rowley

Planning Policy
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
GL50 9SA

Dear John

Cheltenham Local Green Space Designation Consultation

We are writing on behalf of our client, Bovis Homes Limited (Bovis), in response to your email, dated 14 May 2019, in relation to the potential Local Green Space designation in the Council's emerging Cheltenham Plan.

Introduction

Bovis has land interests affected by the proposed Local Green Space (LGS) designation at Leckhampton, referred to in the Cheltenham Plan Pre-Submission Draft (Draft Plan) as Leckhampton Fields, and these interests are shown on the plan attached **Appendix 1**.

Bovis owns the southernmost parcel of land, referred to hereafter as Lotts Meadow. Bovis has an option on the other parcel of land, referred to hereafter as Robinswood Field and makes representations on behalf of the landowner.

Consultation with Landowners

In the Post Hearing Advice Note, the Inspector was clear that *"the views of landowners should be sought during the LGS selection process and their comments should be robustly addressed within any assessments"*. However, the Council has only sought Bovis' views after being prompted to do so at a meeting with yourself on 9 May. The information presented to us at this meeting would suggest that the proposed LGS at Leckhampton will remain largely unchanged, from that referred to in the Draft Plan, with the exception of any Gloucestershire County land required in relation to a new school. As a result, Bovis has no confidence that its views will be taken into account as part of the selection process.

The notification email from the Council on 9 May gave a deadline of 7 June to provide a response. In the Council's Response to advice note (ED031) the Council states that *"Assessing the LGS at Leckhampton and Swindon Village will require engagement with the local parish councils and resident groups who have spent several years working on their evidence. This engagement is already underway"*



but we expect to be able to reach a conclusion and send you the final modifications and evidence by 31 May.” Bovis questions why engagement with landowners, as required by the Advice Note, was not also underway at that point. Bovis is concerned that the engagement process is not fair and balanced. Furthermore, Bovis has no confidence that the views of landowners, that have been sought retrospectively, will have any bearing on the conclusion reached by the Council.

Selection Methodology

In the Advice Note, the Inspector identified various issues regarding the methodology adopted in identifying LGS. In particular, the Council’s LGS Study Reports reference: the “threat of development” as an example of the factors to be considered by communities when assessing possible LGS sites; the use made of Natural England’s Accessible Natural Greenspace Standards (ANGSt); and comparisons of the scale of LGS to that of SSSIs – these are all unhelpful as they have diverted attention from the criteria set out in National policy and guidance. The notification email of 14 May provides no new information and refers back to previously published information, which includes the flawed LGS Study Report. Bovis has no confidence that the Council is making an earnest attempt to address the issues with the LGS selection process.

As noted above, the Council’s response refers to several years spent working on evidence. However, this evidence has been influenced by the flawed guidance relating to the purpose and criteria of LGS. Clearly the identification of LGS at Leckhampton has been driven by a desire to prevent development. Bovis considers that the Council should have prepared further guidance to inform the selection process and ensure that the local community is fully cognizant of the criteria set out in the National policy and guidance.

The Council as Local Planning Authority has a responsibility to ensure that LGS proposed complies with National policy by robustly testing LGS put forward. The proposed LGS designation at Leckhampton covers an extensive tract of land incorporating numerous individual small holdings, fields, paddocks and several private residences in a multitude of ownerships. It is incumbent on the Borough Council to robustly test the LGS proposals for Leckhampton put forward by the Parish Council against national policy and guidance, recognising that where any individual parcel of land or property does not meet the relevant criteria, it should not be designated as LGS.

Leckhampton Fields

In the Advice note the Inspector made the following observations in relation to LGS at Leckhampton:

“Leckhampton Fields is an attractive rural area at the foreground of the Cotswolds AONB, and valued by local residents for its public footpaths, wildlife and tranquillity. However, there is no evidence that the particular features of this area of countryside are so special as to justify its long term protection as an extensive area of LGS. In view of the proposals for large scale residential development within the Leckhampton area, I agree with the Inspector at the JCS examination that an area of LGS would be justified. However, the boundaries fall to be determined through the CP, and the area selected must accord with national policy and advice. I consider that the area of 39.31ha as currently proposed is not justified, and that a new assessment is required to identify an area which would meet the criteria in the NPPF and PPG. LGS proposed within the Leckhampton area will be needed to serve existing and new residential development.”

At the meeting we had on the 9th May, you inferred that the proposed LGS at Leckhampton will remain largely unchanged from that referred to in the Draft Plan, with the exception of any Gloucestershire



County Land required in relation to a new school. In this case, Bovis remains of the view that the LGS at Leckhampton is an extensive tract of land, for the reasons set out in its representations to the Pre-Submission Draft and discussed at the Hearing. Bovis objects to the identification of any such extensive tract of land.

We would draw your attention to the Opinion from Counsel dated 3 April 2018, see **Appendix 2**, which highlights a number of recent cases where Examiners assessing Neighbourhood Plans have considered the matter as to whether a proposed LGS constitutes an extensive tract of land. These cases are compelling, with land areas as low as 2.5 ha. being held to comprise an extensive tract of land. In addition, we recently highlighted a further case, the Craven Local Plan, where LGS designations extending to over 75 hectares and 35 hectares were considered to represent extensive tracts of land.

Counsel's advice is clear that, while there are no hard and fast rules or thresholds in relation to an acceptable maximum size for LGS, compelling and cogent reasons are required to allocate large areas of LGS exceeding 2 ha, and in such circumstances decision takers have consistently regarded these areas as being extensive tracts of land. As such, sites of the size proposed at Leckhampton should be approached with extreme caution. The Inspector's advice note follows this principle in stating that *"there is no evidence that the particular features of this area of countryside are so special as to justify its long term protection as an extensive area of LGS."* In Bovis' view, the Inspector's advice that *"a new assessment is required to identify an area which would meet the criteria in the NPPF and PPG"* should be interpreted as an invitation to identify a significantly smaller area of land, which cannot be construed as extensive, and not to simply seek to justify land that has already been found to be extensive.

Robinswood Field

As set out above, the proposed LGS designation at Leckhampton covers an extensive tract of land incorporating numerous individual small holdings, fields, paddocks and several private residences in a multitude of ownerships, including Land at Robinswood. Land at Robinswood includes two 20th Century dwellings and their residential curtilages, and a rather unremarkable flat grassed paddock bounded in part by hedgerows. A public footpath runs adjacent to the paddock's western boundary, and this is separated from the paddock itself by a modern post and chain link fence. Whilst the footpath provides views into the paddock, there is no public access to the land itself. The property is in private ownership.

With reference to the tests in paragraph 77 of the NPPF (2012), there is no justification for imposing the burden of LGS designation on Land at Robinswood (and the consequences that has for the landowner in terms of any future use of that land). There is nothing inherently or demonstrably visually attractive with regards to the appearance of the land in a landscape/beauty/tranquillity context. It contains two residential properties of no meaningful historic or aesthetic value. There is no compelling evidence to conclude that the site is unique, distinctive or rare so as to elevate its importance above any other small paddock, field or smallholding defined by hedgerows.

Land at Robinswood is a currently unused grassed paddock with no public access. There are no plans to provide public access to it. It has the potential to be used for grazing by small numbers of livestock. It therefore has no recreational value. Neither the CP nor the Parish Council's LGS application seek to claim that the land has recreational value, nor have access rights been sought by any party.



Land at Robinswood does not contain any recorded heritage assets, and it does not form part of the immediate setting of a listed building, Historic Parkland or Conservation Area. It is not in an area designated a scheduled ancient monument. As such the land has no demonstrable historic significance. The land is not subject to statutory or non-statutory nature conservation designations. Survey work has found the land has limited ecological interest.

The LGS referred to in the Draft Plan has a number of exclusions that relate to residential properties and nursery buildings on Kidnappers Lane. Bovis considers that it is entirely inconsistent to exclude those properties whilst including the private residential properties and their curtilages at Robinswood Field. In accordance with the NPPF, policies for managing LGS should be consistent with those for Green Belt. This would place a constraint on the ability of the owner/occupiers to extend their properties, particularly detached residential outbuildings, that is not justified.

Bovis considers that there is no evidence to justify the inclusion of Robinswood Field within an LGS designation.

Lotts Meadow

Lotts Meadow is a large field in pasture of circa 8ha bound by hedgerow and Moorend Stream to the east. It is an extensive tract of land in its own right. Survey work has found the land has limited ecological interest. Whilst Lotts Meadow contains three mature/veteran Pedunculate Oak trees, protected by Tree Preservation Orders, agriculturally semi-improved grassland with an absence of tree cover now dominates the area, with negligible ecological value.

Three Public rights of way run through Lotts Meadow from The Burrows Playing Field to Kidnappers Lane to the west, and up to the path adjacent to Merlin Way to the north. Bovis notes that LGS designation is not required to protect rights of way, and recreational value associated with them, as they are already protected under other legislation.

Lotts Meadow is a highly-visible parcel of land from the Cotwolds AONB. As a result, it was identified as being of high landscape and visual sensitivity in the Landscape and Visual Sensitivity Plan (2012), which formed part of the evidence base supporting the JCS. Its high landscape and visual sensitivity already safeguards its openness without an unnecessary LGS designation. It contains no designated heritage assets and does not form part of the immediate setting of a listed building. It is not in an area designated as a scheduled ancient monument. As such the land has no demonstrable historic significance.

As you are aware, previous planning proposals for the wider site (LPA ref: 13/01605/OUT) retained Lotts Meadow as strategic public open space that would be subject to habitat enhancements including woodland, native scrub, meadow and rough grassland planting and the creation of new wetland habitats. As part of this strategic allocation, the land was also to act as relief sports pitches to enable the periodic resting of those at Burrows Meadows. However, such improvements can only be delivered as part of a comprehensive development.

As set out in National planning guidance, management of land designated as LGS will remain the responsibility of its owner. If the features that make a green area special and locally significant are to be conserved, how it will be managed in the future is likely to be an important consideration. As set out above, Bovis consider that presently, Lotts Meadow does not contain any special features that require additional protection as LGS. However, there is scope to significantly enhance the ecological



and recreational value of the land for existing and future residents, but it is only viable and feasible to do so in association with comprehensive development proposals. Long term management provisions would also be required, and it is important to consider how this would be secured.

Bovis considers that there is no evidence that Lotts Meadow is demonstrably special or holds particular significance, to justify its inclusion within an LGS designation. Bovis considers that there is an opportunity for the enhancement and long-term management of Lotts Meadow as green space for the benefit of existing and future residents, but it must be planned as part of comprehensive development.

Summary

Bovis has serious reservations regarding the consultation and selection process for LGS at Leckhampton. It considers that the Council's response does not follow the Inspector's advice. It is concerned that an extensive tract of land will be put forward for designation as LGS which is not justified and not compliant with national guidance. Bovis objects to the inclusion of its land, or land that is in its control, within an LGS designation. A Draft Plan containing an extensive LGS designation at Leckhampton would not be positively prepared, justified or consistent with national policy.

We would be grateful if you could take the above comments into account as part of the selection process for LGS in Leckhampton, and make these representations available to the Inspector. Should you have any queries, please do not hesitate to contact myself using the details below.

Yours sincerely

Russell Smith MRTPI
Principal Consultant

Email: russell.smith@walsingplan.co.uk
Mobile: 07471 952 415



APPENDIX 1 – PLAN IDENTIFYING BOVIS' LAND INTERESTS





Walsingham Planning Limited. Company Reg No. 09402985 VAT No. 245 9002 16
Registered Office: Bourne House, Cores End Road, Bourne End, Bucks SL8 5AR

Also offices in Bourne End and Knutsford

Re: Local Green Space at Land off Shurdington Road, Leckhampton

OPINION

Introduction

1. I am instructed in this matter by Andrew Winstone of Walsingham Planning on behalf of Bovis Homes in respect of Land off Shurdington Road, Leckhampton (“the site”). Cheltenham Borough Council is presently consulting on the Regulation 19 Pre-Submission Draft of the Cheltenham (Local) Plan, and the emerging Plan (“eLP”) proposes a substantial area of Local Green Space (“LGS”) on the site amounting to nearly 40ha.
2. I am asked to advise on those proposals in light of extant national policy, guidance and practice that has emerged in relation to the examination of LGS proposals. In particular, I consider the question of whether the LGS proposed on the site is or is not “*an extensive tract of land.*”
3. I am grateful to those instructing for providing the background documents in this matter to which I refer below. I make clear at the outset that I am content for this Opinion to be submitted alongside the representations of those instructing in respect of the eLP.

Planning Policy and Guidance

National Planning Policy Framework

4. Paragraphs 76-78 of the NPPF set out the national policy in respect of Local Green Space. In particular, paragraph 76 explains the purpose of LGS and the requirement that such a designation should be consistent with the achievement of sustainable development. Paragraph 77 provides criteria that are to be met in respect of each LGS designation to ensure the aims of paragraph 76 are satisfied. Paragraph 78 straightforwardly emphasises that policies for development within a LGS should be consistent with policy for Green Belts.
5. The wording of the paragraphs is reproduced below for ease of reference:

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
- 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.

6. Analysing those paragraphs it is clear that:

- (i) Local Green Space is an exceptional designation. NPPF 77 makes clear that the LGS designation is not appropriate for **most** green spaces or open space, given that under NPPF 78, LGS is equivalent to Green Belt. The imposition of a “*very special circumstances*” approach inevitably carries with it the same exceptionality requirement for designation at the plan-making stage to be applied in the Green Belt context;
- (ii) Second, any LGS site must be physically limited and constrained: NPPF, 77: “*reasonably close proximity*”, and cannot be an “*extensive tract of land*”.
- (iii) Third, LGS must also serve some community activity or purpose (it is not a Green Belt prevention of development policy): “*the green*

area is demonstrably special to a local community and holds a particular local significance,...

- (iv) Finally and importantly, LGS can only be designated where a determination has been made in respect of the sufficiency of housing provision, NPPF 76: *“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.”*

National Planning Practice Guidance

7. Further guidance is provided in the NPPG and repeated below, again for ease of reference. The guidance makes clear that extensive tracts of land are **not** appropriate for the LGS designation, which should not be used as a back door route to achieving what would amount to a new area of Green Belt by any other name. The examples of Green Space given, such as *“sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis”* are all likely to be **small** well defined local spaces or features where the entire area is demonstrably special. That is entirely consistent with NPPF 77 and the three restrictive criteria.

What types of green area can be identified as Local Green Space?

The green area will need to meet the criteria set out in paragraph 77 of the National Planning Policy Framework. Whether to designate land is a matter for local discretion. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.

Paragraph: 013 Reference ID: 37-013-20140306

Revision date: 06 03 2014

How big can a Local Green Space be?

There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 77 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back

door' way to try to achieve what would amount to a new area of Green Belt by another name.

Paragraph: 015 Reference ID: 37-015-20140306

Revision date: 06 03 2014

Is there a minimum area?

Provided land can meet the criteria at paragraph 77 of the National Planning Policy Framework there is no lower size limit for a Local Green Space.

Paragraph: 016 Reference ID: 37-016-20140306

Revision date: 06 03 2014

What about public access?

Some areas that may be considered for designation as Local Green Space may already have largely unrestricted public access, though even in places like parks there may be some restrictions. However, other land could be considered for designation even if there is no public access (eg green areas which are valued because of their wildlife, historic significance and/or beauty).

Designation does not in itself confer any rights of public access over what exists at present. Any additional access would be a matter for separate negotiation with land owners, whose legal rights must be respected.

Paragraph: 017 Reference ID: 37-017-20140306

Revision date: 06 03 2014

Draft NPPF

8. LGS policy is proposed to be set out in paragraphs 100-102, but there is no significant change to the detail of that policy. I do not address it further in this Opinion.

Local Green Space at Examination

9. There have been a number of Examiners Reports particularly in the Neighbourhood Planning context (where LGS is most commonly designated), dealing with the question of what comprises an extensive tract of land? While each submission will turn on its own facts there are some general principles that emerge, given that whether or not a site is to be regarded as "extensive" is less susceptible to locational variation than whether any one particular site is demonstrably special to the local community it serves.

10. In Backwell, it was proposed to designate a site known as Farleigh Fields measuring 19 hectares as LGS. The site is located just outside the Bristol Green Belt. The majority of the site was owned by Charles Church/Persimmon Homes Severn Valley and was proposed for a residential scheme with substantial public open space.
11. Examiner Nigel McGurk, in his Report of 29th October 2014, began by observing that Local Green Space is a *“restrictive and significant policy designation”* equivalent to Green Belt designation. He held that *“it is essential that, when allocating Local Green Space, plan-makers can clearly demonstrate that the requirements for its allocation are met in full.”*
12. The Examiner found that *“the most striking thing about Farleigh Fields and Moor Lane Fields (a site of 32 hectares) is their substantial size”*. He rejected a submission by the Parish Council that a distinction might apply in respect of rural or semi-rural areas, as no such distinction appeared in the Framework. The Examiner continued:

“In the case of Farleigh Fields, it is my view that 19 hectares also comprises an extensive tract of land. To provide some perspective, at least twenty-three full size football pitches would easily fit in to an area of this size.

Given that the Framework is not ambiguous in stating that a Local Green Space designation is not appropriate for most green areas or open space, it is entirely reasonable to expect compelling evidence to demonstrate that any such allocation meets national policy requirements. Specific to demonstrating that Farleigh Fields, and Moor Lane Fields are not extensive tracts of land, no substantive or compelling evidence has been presented.”

13. In addition to the Backwell Neighbourhood Plan, the following Examiner’s Reports into draft Neighbourhood Plans make similar points, finding several proposed LGSs to constitute ‘extensive tracts of land’ and as such, were not capable of being designated as LGS. All the Examiner’s Report and many of the background documents are freely available online and can be provided (or extracts of them) with the representations if necessary:

- (i) **The Alrewas Neighbourhood Plan** (Examiner’s Report dated August 2015)
– the Examiner removed the proposed LGS designations affecting two sites of 2.5 and 3.9 hectares respectively, having found these to

constitute extensive tracts of land by virtue of their size and there being no compelling evidence to demonstrate why the sites were demonstrably special to the local community.

- (ii) **The Sedlescombe Neighbourhood Plan** (Examiner's Report dated January 2015) – the Examiner found the proposed LGS at Street Farm, stretching 4.6 hectares across an area of open land, to be extensive in size and therefore contrary to national planning policy.
- (iii) **The Tatenhill Neighbourhood Plan** (Examiner's Report dated November 2015) – the Examiner considered that two sites, the smaller of which was 4.3 hectares, proposed to be designated as LGS through the NP, constituted extensive tracts of land and instructed their removal from the draft NP, given their inclusion failed to meet the tests in the NPPF.
- (iv) **The Oakley and Deane Neighbourhood Plan** (Examiner's Report dated December 2015) – the Examiner concluded that a proposed LGS designation on a site of just over 5 hectares to be contrary to national planning policy.
- (v) Similar findings were made in respect of **the Brixworth Neighbourhood Plan** Report, at paragraph 4.63 in respect of LGS1, LGS2 and LGS3, three sites measuring 22.5ha, 7.2ha and 2.7ha in size respectively.
- (vi) The Faringdon NP Examiner's Report (August 2016) considered whether an area called Humpty Hill was an extensive tract of land :

“7.91 ... I have concluded that land at Humpty Hill is an extensive tract of land. It is 5.6 hectares in size and on the day of the hearing was partially-overgrown grazing land. Paragraph 77 of the NPPF indicates that local green space designation will not be appropriate for most green areas or open spaces. Whilst the circumstances are not identical it is also clear that other similar parcels of land elsewhere in other emerging neighbourhood plans have been considered by another examiner to be extensive tracts of land. “

14. Accordingly, while there are no hard and fast rules or thresholds in relation to an acceptable maximum size for LGS, given the foregoing, compelling and cogent reasons would be required to allocate large areas of LGS exceeding 2 hectares in circumstances where decision takers have consistently regarded

such areas as being “extensive” tracts of land. That is not to say there are not exceptions; as a matter of judgement, there will always be special cases, but sites of the size proposed at Leckhampton should be approached with extreme caution.

Proposed LGS at Leckhampton

15. The LGS at Leckhampton has been promoted by the Leckhampton with Warden Hill Parish Council Joint Neighbourhood Forum. The area promoted is included within emerging policy GI1 ‘Local Green Space’ for a total area of 39.31 ha at ‘Leckhampton Fields.’ The reason given on page 113 of the eLP is that the JCS Inspector discussed LGS at Leckhampton in her Preliminary Findings and a judgement was made that there was evidence that the LGS designation met the NPPF criteria and was justified.
16. At best, Officers have misunderstood the JCS Inspector’s findings. At worst, it is a deliberate attempt to misrepresent both the task and the conclusions of JCS Inspector for the reasons discussed below.

Opinion

17. The JCS Inspector did not support the allocation of an extensive tract of land at Leckhampton for LGS at all; rather, she found that the principle of LGS at Leckhampton was justified and that there was scope for designation within the larger site area, which was proposed to be allocated for housing at that time. In her preliminary findings (Examination document 146), the Inspector considered the proposals– which amounted to 54 ha – to be too large to accord with national policy. At paragraph 66, the Inspector considered that *“Detailed boundaries are best left for either the Cheltenham Borough Plan or the forthcoming Neighbourhood Plan.”*
18. The discussions that followed between the Inspector and the JCS authorities did not change that position and translated into part 6 of policy SA1 as follows:

“Strategic Allocations should seek in all cases to retain and enhance areas of local green space within the boundary of the allocation, which meet the criteria in the NPPF and relevant national guidance whilst delivering the scale and distribution of development required by this policy. This is in addition to the requirements of Policy INF3. :

19. There is therefore no justification whatsoever within the Inspector's preliminary findings, or the JCS itself, for LGS of the size proposed at Leckhampton to be designated. It is surprising that no other justification is given in the eLP. It will also be immediately obvious that Leckhampton fields is very much larger than any other site promoted as LGS – 40 of which are less than 1ha, and a further 15 of which are between 1 and 2 hectares.

Conclusions

20. Whether the first two criteria of NPPF 77 are met, and whether or not the area is "local in character" for the purpose of the third, is dealt with in other submissions. As to whether the allocation is "an extensive tract of land" in conflict with the third criteria, there is a very good argument for saying it is. The proposed area is extremely large, and encompasses a range of fields, and indeed private property, and so does not sit comfortably with national policy that promotes a sensible and restrictive approach to the designation of such areas.

21. The Inspector examining the eLP will have to consider very carefully whether the proposed area and each of its constituent parts meets the criteria set out in the NPPF. For example, is the land, and each part of it demonstrably special to the local community? It may well be that parts of the proposed LGS do meet the criteria set out at NPPF 76 and 77, but that does not provide any justification for allocating nearly 40ha of land without compelling justification for doing so.

22. I trust I have covered all those matters on which I was asked to advise, but those instructing should not hesitate to contact me if I can be of further assistance.

Thea Osmund-Smith
No5 Chambers
3rd April 2018

**Re: Local Green Space at Land
off Shurdington Road,
Leckhampton**

Opinion

Andrew Winstone
Walsingham Planning
1 Gas Ferry Road
Bristol
BS1 6UN

Ref: PR.256

Thea Osmund-Smith



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5 June 2019
L 190520 MD Suggested LGS Extent



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Dear John

Re: Proposed Local Green Space Designation at Leckhampton

Introduction

Savills is instructed by Taylor Wimpey Strategic Land (TW) to write to you in relation to Local Green Space that is proposed for allocation in Leckhampton through the emerging Cheltenham Local Plan (eCLP).

The submission draft of the eCLP proposed to designate 39.31 hectares of land at Leckhampton as Local Green Space (LGS) under draft policy GI1. Savills, on behalf of TW, made a number of representations which has challenged the justification behind the extent of the proposed designation. Savills also appeared at the hearing session of Matter 4 of the Examination in Public of the eCLP to make this point verbally. The key arguments of the case are outlined within Savills' Hearing Statement on Matter 4 which I will not repeat here.

Inspector's Post Hearing Advice Note on LGS

The Inspector's Post Hearing Advice Note to the Council (ED030) raised significant concerns regarding the robustness of evidence used to justify the Local Green Space designations made in the eCLP. Particular note is made of paragraph 28 which states that

"Whilst it is a consequence of the successful designation of a site as LGS that it will be protected from future development, that should not be the primary reason for seeking the designation. The aim of the policy is to protect areas of particular importance to local communities and there is nothing in the NPPF which describes their use for the strategic containment of settlements or as a strategic designation to protect the countryside."

The Inspector surmised that including the "threat of development" as a factor to be considered when assessing the suitability of LGS within the LGS Study the assessment has been confused. Further confusion stems from comparisons with SSSIs given that the designation criteria are completely different. Both of these points were discussed at length in Savills submissions on the proposed LGS designations, and specifically in relation to Leckhampton.

Indeed, the Inspector at paragraph 30 points to the fact that many of the uses being forwarded as means of justifying LGS designations on sites such as Leckhampton, are commonplace in areas on the urban fringe of any settlement. Thus, these reasons alone are not sufficient to reach the "high bar" necessary for LGS.

Paragraph 33 of the Inspector's Note draws attention to those proposed areas of LGS that are large, including Leckhampton. The insinuation is that the designation of such a large area as being local in character would be difficult and require "robust justification". At paragraph 34 the Inspector is explicit that this area is not justified and a net assessment is required to identify an area of LGS that would be suitable in



terms of size. The Inspector also has concerns in terms of whether the particular area is so special that it warrants designation as LGS.

The Council has resolved to undertake Option 2 as set out in the Inspector's Note and undertake a full assessment of those sites that were not previously identified as public open space under previous plans. This assessment should result in fully justified boundaries against the tests of the NPPF and with reference to guidance within the PPG, which was missing in the submitted evidence base.

Implications for Leckhampton LGS Designation

There are two main outcomes of the Inspector's Note with regards to the proposed Leckhampton LGS designation. These are:

- The area currently proposed is an extensive tract of land that is not of local character and therefore it is too large to be considered for designation as LGS.
- While the area proposed may contain some land that is special enough to meet the high bar for LGS, not all of it does and this land is therefore not appropriate for designation.

This being said the Inspector is clear in paragraph 34 that she agreed with the JCS Inspector in that there is some scope for a LGS designation in Leckhampton "to serve existing and new residential development".

Given previous comments from the Inspector in terms of the LGS designation being dependant on the quality and use of the land itself, rather than external matters such as demand from development and desire to obstruct development, this is somewhat surprising. This is particularly the case as any open space requirement resulting from new development in north Leckhampton will have to provide its own public open space to mitigate its impact. Reliance on third party land outside of the site to meet the open space requirements would not in itself justify the designation of LGS.

However, notwithstanding the point on need, the Inspector is clear that the eCLP should provide for some LGS in the area, but it must be smaller than that proposed previously.

Proposed Extent of LGS at Leckhampton

In order to comply with the Inspector's requirements for a smaller area of LGS it is essential that the area proposed is the most special part of the LGS as previously identified, to ensure that the tests of paragraph 77 of the NPPF are met.

The issue with defining this area is that much of the area identified as a potential LGS designation shares a common character and many of the same characteristics in terms of ecology etc. This character and characteristics are broadly what can be expected from a rural / urban fringe setting.

Enclosed with this letter is a proposed extent of LGS for Leckhampton and represents an area that it is believed to most closely match the requirements of the NPPF tests. This should not necessarily be seen as an acceptance that this land is suitable for LGS, but if there was to be such a designation which would be the most appropriate land. We acknowledge that the site is quite large in comparison with similar LGS, however, we would anticipate that only part of the hatched green area in the attached document is used for LGS.

The table below seeks to identify how the identified parcel of land performs against the NPPF tests, on its own merits, as well as in comparison from other parcels of land that were identified within the eCLP as part of the Leckhampton LGS.

NPPF Para 77 Test	Sub Test	Site Performance	Performance in Comparison to Rest of Leckhampton
Where the green space is in reasonably close proximity to the community it serves	NA	The site is located close to the main concentration of development at Leckhampton which lies to the east and north east. The site is connected to the main area of development by a public footpath through publically accessible playing fields.	The remainder of the proposed area is more remote from the main concentration of development in Leckhampton. Generally speaking the land in the centre of the previously proposed LGS designation is the most remote from existing development and that currently under construction by Redrow to the west. This limits the local character of the land between Hatherley Brook and Kidnappers Lane specifically.
Where the green area is demonstrably special to a local community and holds a particular local significance, for example because...	of its beauty	The character of the parcel is conducive with its urban / rural fringe location. It contains mature boundary tree and hedgerow planting as well as established individual trees and is traversed by footpaths.	The site is of a more open character than the land to the east in that there are less internal hedgerows. As such it is experienced as a single entity, rather than the other fields which are smaller and therefore appear as parts of a whole. The experience of the site as a single thing would seem to correspond more to the PPG examples of LGS which are all single entities, rather than collections of items.
	historic significance	Much of the historic significance is associated with the land uses present and the field pattern rather than the presence of any specific assets. The field pattern itself does not appear dissimilar from other land between the A46 and Leckhampton Lane/Church Road.	The key statutory historic assets on the site is the Scheduled Monument (SAM) which lies off Church Road. This is outside of the land identified within this letter. However, the SAM and thus appears separate from the nearby fields. The fact that it is granted its own statutory protection as a

			SAM limits the need to designate the asset as part of LGS.
	recreational value (including as a playing field)	The Local Green Space Study Part 1 states only identifies Lotts Meadow and White Cross as areas used for informal sports and general recreation. White Cross is not within the original eCLP proposed LGS and therefore Lotts Meadow is the only parcel identified as being used for this purpose.	Lotts Meadow is the only parcel proposed for LGS that is identified as being used for this purpose.
	tranquillity	The site is experienced as tranquil but no more so than other locations in the rural / urban fringe and the AONB to the south. The site does not contain any residential properties which by their presence limit tranquillity.	Overall the site is no more or less tranquil than other land within the previously proposed LGS designation. Other parcels proposed include residential dwellings which limit the tranquillity of the land.
	richness of its wildlife	The evidence produced on this matter within the Local Green Space Study Part 1 and the Leckhampton with Warden Hill Parish Council Neighbourhood Planning NPPF Concept Plan & Local Green Space Application (July 2013) is generic and does not discuss the dispersal of any wildlife value throughout the whole of the proposed LGS designation. Furthermore, there would not seem to be any specific species or habitats present that would not be expected in other edge of settlement locations in Cheltenham. In this regard the site as a whole is not special.	The evidence produced on this matters does not differentiate between parcels within the site to the extent that it is possible to say that one site is more important than another. However, it should be noted that many of the species and habitats put forward in evidence to support LGS designation would not appear unique but commonplace in the rural / urban edge.

<p>Where the green area concerned is local in character and is not an extensive tract of land</p>	<p>NA</p>	<p>The area measures 15.1ha hectares which remains large in terms of the examples of potentials LGS designations given in Planning Practice Guidance (duck pond, war memorial etc). The use of existing built development to the east and south, Kidnappers Lane to the west, and proposed development to the north results in a well-defined area. While large the site is much smaller and better defined than previous proposals which is an obvious improvement.</p>	<p>The site offers a well-defined area of a smaller size than the original proposal. Other areas do not offer the same boundaries whilst maintaining a sufficiently small footprint as required by the Inspector. The defined LGS area can be further reduced within the defined boundaries if required.</p>
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The land identified as part of this letter contains all of the key assets put forward in evidence to support the designation of a wider area of LGS in Leckhampton as part of the eCLP. However, the site is in closer proximity to the bulk of built development in Leckhampton which is a key point of difference between it and other parcels proposed as LGS. The LGS boundary as proposed in this letter also excludes residential properties which enhance tranquillity in comparison to other parcels identified by the eCLP.

The parcel also benefits from clearly defined boundaries which will ensure the ability of the designation to remain in the long term by minimising the potential for their erosion in the long term. While not a specific test in the NPPF, this is a benefit.

Summary

The Council has been tasked by the Inspector to identify and justify an area of LGS in Leckhampton that is smaller than that proposed within the eCLP so that it is local in character and not an extensive tract of land.

Land has been suggested which centres around Lotts Meadow and is identified within a supporting map. This land is still relatively large in the context of LGS, but benefits from well-defined boundaries and a more local character than the wider proposed allocation. At 15.1 hectares, the site is quite large in comparison to other examples of potentials LGS designations given in Planning Practice Guidance. We consider that not all land designated for LGS as shown on the attached plan would need to be used for this purpose. The land identified exhibits all of the characteristics put forward in evidence to support the wider allocation, albeit on a smaller scale.

As such, should an area of LGS be required in Leckhampton it is suggested that this is the best location for it when considering the requirements of the NPPF and site specific considerations.

It should be noted that concerns still exist regarding how special the Leckhampton site is in terms of LGS and if there is a point of difference between this area and other parts of the rural / urban fringe of Cheltenham. Furthermore, questions still remain over the validity of a “need” for LGS existing a result of proposed development in the north, rather than being exclusively based on the merits of the land itself against the NPPF tests.

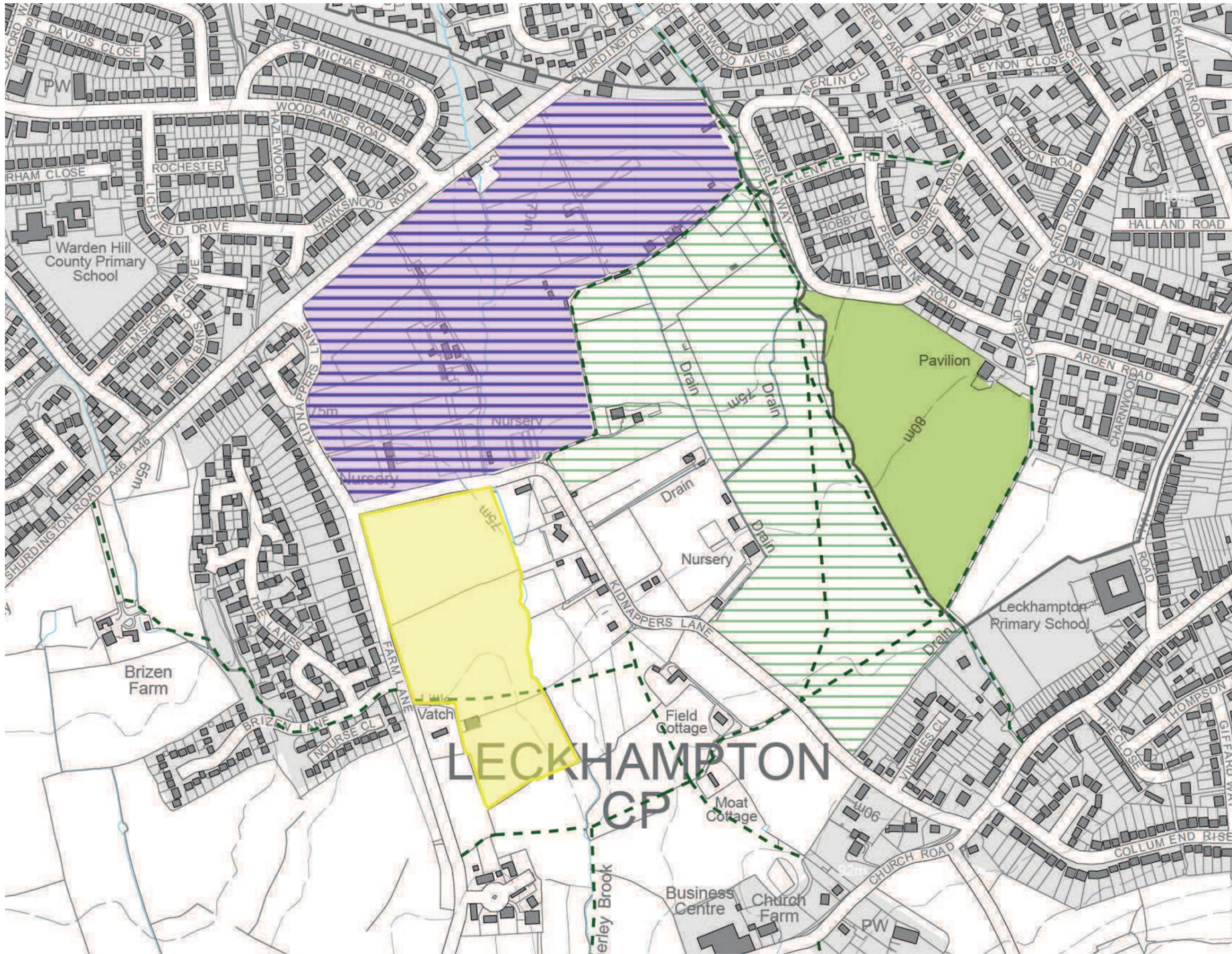


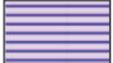
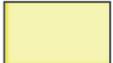
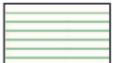
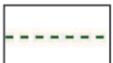
Yours sincerely

Matthew Dawber
Associate Planner

cc.
Felicity Crawford - Taylor Wimpey

enc.
Proposed Area of Local Green Space



-  Existing development
-  Proposed mixed use allocation - MD5
-  Existing playing pitches
-  Gloucestershire County Council land - potential school site
-  Proposed area of Local Green Space (15.1ha)
-  Existing public rights of way

Leckhampton

on behalf of Taylor Wimpey Strategic Land

drawing no.	01	drawing	Proposed Leckhampton Local Green Space Plan	
revision	-	drawn by	CS	job no. OXPL388999
scale	1:5,000 @A3	checked by	MD	date 21/05/2019



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The Parish Council of Leckhampton with Warden Hill

Cheltenham, Gloucestershire

Clerk: Ms Arlene Deane, The Gate House, Cedar Court, Humphris Place, Cheltenham, GL53 7FB
tel. 01242 465762 email: lwwhpc@gmail.com

24 May 2019

Inspector Wendy Burden
Cheltenham Local Plan Examination
Thru. Cheltenham Borough Council

Dear Inspector Burden

We were surprised and somewhat puzzled by your initial comments concerning the Leckhampton Fields Local Green Space (LGS). We understand your doubts about the way that the Cheltenham Plan has unfortunately sought to designate so many areas as LGS that are already well protected in other ways. This is why the Parish Council only put forward the Leckhampton Fields for designation. We did not ourselves propose Burrows Field or Weavers Field as these were already protected under the 2012 QEII Fields Challenge even though these areas were included by CBC in the areas proposed as LGS.

As discussed in section 1 below, almost all of the Leckhampton Fields LGS is already fairly well protected as valued landscape or for its very high landscape sensitivity as identified in the JCS^[14]. Scope for large scale development is also very constrained by the issue of severe cumulative traffic congestion^[10]. Nevertheless we believe the LGS designation is very important if we are to preserve the landscape and amenities of the Leckhampton Fields. In sections 2 of this letter we have addressed your questions of whether such a large LGS is consistent with the requirement in the NPPF that a local green space should not be an extensive tract of land.

In section 3 we have covered the proposed new secondary school. The Parish Council would be prepared, subject to some conditions, to remove the GCC land from the LGS if it is used for the secondary school. But it is still very unclear to us whether the school is viable based on its currently proposed size and catchment. The latest input from the Parish Council to GCC on this is attached at Annex C. Unfortunately, despite the apparent willingness from GCC at the transport hearing to provide information on the proposed improvements at the A46/Moorend Park Road junction, the Country Council refused to provide any information and it is still not clear that they have a viable solution to the traffic problem. We wrote to you about this on 8th March but we understand that CBC did not in fact forward our email to you (Annex D).

We have attached a reference list and two other annexes. Annex A provides a short history of how the LGS has evolved from 2011 to 2015. Annex B is the report from the public consultation in January 2015 on the LGS. It gives detailed evidence and analysis on how residents use the

1. Need for LGS designation

1.1 Protection of much of the Leckhampton Fields as valued landscape

Much of the area of the Leckhampton Fields LGS is designated as valued landscape through the findings of Inspector Paul Clarke in April 2016 ^[10], endorsed by Secretary of State, in dismissing the planning appeal by Bovis Homes and Miller Homes on their application for 650 dwellings on the Leckhampton Fields. The valued landscape designation was based explicitly on the joint grounds of the intrinsic landscape quality of the Leckhampton Fields themselves and their importance to the view from Leckhampton Hill. That same combination of the value of the Leckhampton Fields and the value of the view from the Hill to local people is also reflected in the LGS application. The Leckhampton Fields and their rich network of footpaths are very special to and primarily used by the people of South Cheltenham; Leckhampton Hill and its view are very special to the local people of all Cheltenham and its environs. The very high value of both is well demonstrated from the public consultation on the proposed LGS in January 2015 that is attached at Annex B.

The rejection by the Secretary of State of the Bovis-Miller appeal was based not just on valued landscape but also on severe cumulative traffic congestion ^[10]. This could imply that valued landscape may not by itself provide sufficient protection. The appeal by Robert Hitchins against rejection of their application to build 45 houses on area ON in the Leckhampton Fields was dismissed by Inspector Bridgwater in April 2018 on the grounds of the damage to the valued landscape of the Leckhampton Fields, including the damage to the view from Leckhampton Hill. It did not rely on traffic congestion, but the closeness of the proposed development to Leckhampton Hill was an important consideration. So valued landscape designation may not by itself be sufficient to protect parts of the LGS further away from Leckhampton Hill. These parts are crucial to the LGS footpath network. The footpaths through the smallholdings (area SH) and Robinswood Field (area R1) and along Moorend Stream are the most heavily used sections of the footpath network and essential to all the longer walking circuits. The smallholdings also add a lot of diversity and interest to the walks.

So the valued landscape designation by itself is not sufficient and LGS designation is needed. LGS also reflects a different type of value. Valued landscape reflects the value in landscape terms but not the value to local people, whereas LGS reflects the high value and specialness to local communities.

1.2 Land between Kidnappers Lane and Farm Lane

It is uncertain whether or not the central fields (areas CF1 to CF6 between Kidnappers Lane and Farm Lane) are included in the valued landscape designation. These areas were not part of the area covered by the Bovis-Miller application and subsequent appeal. But they were included in the area that Inspector Clarke examined on his escorted site visit with developers. In his report Inspector Clarke also placed substantial weight on a 2003 report for Cheltenham Borough Council by Landscape Design Associates ^[6] that covered the CF area as well as the fields east of Kidnappers Lane.

Areas CF4, CF5 and CF6 were identified as having the highest landscape sensitivity in the JCS and were kept as green infrastructure in the JCS masterplan for the Leckhampton Strategic Allocation, as also was Lotts Meadow (area LM). The fields west of Farm Lane, which are now the site of the Redrow development of 377 dwellings, were also identified as being an area of High Landscape and Visual Sensitivity in the JCS Landscape and Visual Sensitivity and Urban Design Report of Oct 2012 ^[14]. However, unlike areas CF4, CF5, CF6 and LM, they were included in the strategic allocation and, despite Inspector Ord's conclusion in her preliminary findings that these fields should be protected, planning permission was granted by Tewkesbury Borough Council in 2016 and was upheld in the High Court. Significantly Natural England, having objected very strongly to development on the Cheltenham part of the Leckhampton Fields, objected much less to the development on the fields west of Farm Lane, mainly requiring the inclusion of a buffer zone along Leckhampton Lane to protect the rural character of the Lane and the edge of the AONB.

So the fact that the Redrow development has been permitted on land adjacent to the AONB and adjacent to areas CF4 and CF5 does not necessarily create a precedent for allowing development on areas CF4, CF5 and CF6 themselves. But it nevertheless shows that it would be unsafe to rely just on the proximity of these areas to the AONB and Leckhampton Hill. Therefore again the Parish Council believes that protection as LGS is essential and reflects the fact that these areas are very special to local people as well as their high landscape and visual sensitivity.

Areas CF4 and CF6 are very important to the footpath network. The Cheltenham Circular Path runs through these two areas and along the south side of CF3. With the Redrow development having now destroyed the previous very fine views of Leckhampton Hill from the land west of Farm Lane, CF6 and CF4 now provide the only good close views of Leckhampton Hill from the Cheltenham Circular Path. The Cheltenham Circular Path runs along the side of Charlton Kings Common and then descends down the lower slopes of Leckhampton Hill to St Peter's Church and thence into area CF6 and west to area CF4. It is only when one reaches CF6 that one can appreciate the Hill fully.

The January 2015 public consultation on the LGS (Annex B) showed that CF6 is the part of the Leckhampton Fields used by the highest number of local people. This does not mean that it has the most heavily used footpaths; that honour belongs to the footpath through the smallholdings and Robinswood Field. But CF6 is the heart of the footpath network, the centre of what are sometimes referred to as the 'figure of 8 walks'. The rich network of footpaths on the Leckhampton Fields creates a large number of possible circular and figure of 8 walks, the longest circular walks being about 2 miles in length. Significantly in the context of the proposed new secondary school most of the longest walks include the footpath across CF2.

The small area CF3 (0.6 ha) east of Farm Lane, is currently the subject of a planning application for two dwellings. The importance of this area to the LGS is that it is crucial to preserving the semi-rural character of Farm Lane and it gives fine rural views from Farm Lane across the Leckhampton Fields as well as hosting displays of wild flowers at some times of the year. Between the Redrow Estate and Farm Lane there is a fairly wide buffer of recently planted trees that together with CF3 preserve the semi-rural character of the Lane. Most of the long circular and figure of 8 walks include the footpath along Farm Lane passing CF3 and so also do the

shorter circular walks from Farm Lane used by residents in Farm Lane and the Lanes Estate and the growing number of residents in the Redrow Estate.

1.3 Protection of the view from Leckhampton Hill

In strongly objecting to development on the Leckhampton Fields, Natural England said that development would 'interrupt' the view from Leckhampton Hill. It is worth comparing the view from Leckhampton Hill with that from Sutton Bank, which is claimed to be the finest view in all England. Both views are looking from the top of a high scarp of Jurassic limestone. In the case of Sutton Bank, which is in the Yorkshire Moors National Park, one is looking across the very peaceful valley of the River Swale to the Yorkshire Dales, a distance of about 30 miles. From Leckhampton Hill the view is similarly across the Severn Valley for about 20 miles to the Malvern Hills, further north about 45 miles to the Shropshire Hills and further south to the Black Mountains and the line of Brecon Beacons (55-60 miles). On the very clearest day in the farthest distance looking a little north of Hay Bluff it may be possible to just discern the top of Drygarn Fawr, the highest peak in the south part of the Cambrian Mountains, a distance of 73 miles.

At Sutton Bank a key feature is a large wooded lake in the middle foreground that adds considerably to the beauty and interest of the view. For Leckhampton Hill, there is Cheltenham in the mid-foreground, which seen from this vantage point with its abundance of trees, is a beautiful town and adds great interest to the view. But critical to the beauty is that the Leckhampton Fields establish enough of a rural foreground so that Cheltenham is a feature in the landscape of the Severn Valley and not an urban conglomeration in the foreground.

To keep the Leckhampton Fields looking rural it is very important to have a well screened urban edge. We concluded that development can be acceptable on the Northern Fields because the trees in the smallholdings and along Hatherley Brook would provide screening and a good edge, particularly with the addition of some further trees. Development on areas R2 and R3 however would break through the edge. The Parish Council removed R2 and R3 from the LGS in the January 2015 revision on the grounds that development there could be screened from the footpath in Robinswood Field. But from the point of the view from Leckhampton Hill, areas R2 and R3 should have been retained in the LGS.

Inspector Ord, having spent a very long time examining the view from Leckhampton Hill, particularly on her third accompanied visit shortly before delivering her findings on 21 July 2016, ruled out development on R2 and R3. Cheltenham Borough Council has, however, ignored her findings and has included R2 and R3 in the developable area. The Parish Council believes that this was a bad error. It is conceivable that in the longer term some development could be permitted on R2 if it were sufficiently sensitive and provided that trees have been planted and allowed time to grow to sufficient height to screen the housing and to provide a good new urban edge. The Parish Council and Miller Homes have discussed this in their joint meetings in 2017. The trees would however need some 20 years to reach sufficient height. John Rowley has said to the Parish Council in discussion that just because R2 and R3 have been included in the developable area does not mean that development would be permitted there within the timescale of the current Cheltenham Plan. We are concerned however that this might be in conflict with the suggestion given to you in the Examination hearing that a contingency of 100 dwellings might be possible above the 250 planned.

1.4 Preserving the landscape and value of the Leckhampton Fields

An important but sad reason for needing LGS protection of all of the LGS area is that developers and landowners may otherwise be motivated to damage the landscape in the hope of obtaining future planning permission. Some old orchard trees were cut down in the context of a tentative application for development on CF6 in about 2015 and an attempt was also made to prevent the use of the footpaths in area CF6 by replacing the stiles by a fence in one case and a difficult stile in another. The County Council took very swift action over this but it illustrates the problem if development were to remain a possibility even if a very remote one. Another example occurred immediately after Inspector Ord announced her findings on the Leckhampton Fields in July 2016 when within a fortnight Bovis Homes erected a 1.9 metre high chain-link fence all along the footpath in Robinswood Field, which previously had been an open field. The Parish Council offered to have the fence replaced at its own expense with a 1 metre high fence that would have been far more suitable to the valued landscape, but Bovis Homes refused. Robert Hitchins in their appeal in 2018 then tried use the fence as evidence of urbanisation of the area.

Thus, it is only by designation as LGS that the area be securely protected and the landscape quality maintained and renewed. Following LGS designation, the Parish Council is intending to set up a charity 'Friends of the Leckhampton Fields' to harness local funding and effort to improve the LGS and to share the maintenance responsibility with landowners.

2. Justification for an area of 39 ha

NPPF paragraph 76 says that LGS designation should only be used 'where the green area concerned is local in character and is not an extensive tract of land'. The area is certainly local in character but the issue is over its size and what is meant by an 'extensive tract' in the LGS context. Councillor Martin Horwood, who as Cheltenham's MP actually introduced the LGS concept into the NPPF in 2011, explained in the Examination that 'extensive' is used here in the way that green belt extends round an urban area such Cheltenham and that what the wording means is that LGS should be small and localised compared with Green Belt.

In the English dictionary, the word 'extensive' when used to describe land generally means extending a long way or very wide ranging. Its root comes from the old French for stretched out. The Collins English dictionary in defining the word extensive gives the examples 'extensive moorland' or 'extensive deserts'. The Oxford dictionary gives some synonyms for extensive such as great, huge, vast, immense, boundless, immeasurable. Of course, a garden can also be described as extensive and in that context extensive would have the meaning of large or very large by comparison with most gardens. But a garden is not a tract of land. The Oxford dictionary defines tract as 'A region or expanse of indefinite extent and shape'. The Collins English dictionary again gives the examples of 'an extensive tract of moorland'. So whilst the word 'extensive' as used in the NPPF might leave some ambiguity because it is a word with a very wide range of meanings in different contexts, the wording 'extensive tract' makes clear that the NPPF is not referring to an area of 39 ha as an extensive tract, nor arguably even the area of 74 ha that was originally proposed in the Neighbourhood Plan Concept submitted jointly by Leckhampton with Warden Hill and Shurdington Parish Councils to Cheltenham and Tewkesbury Borough Councils in August 2013 ^[13].

At the Examination, Councillor Horwood said that he had suggested in 2013 that the Government might include an indicative maximum LGS area in the NPPF guidance and that this might be 55 ha, a figure based roughly on the area of the Cheltenham part of the Leckhampton Fields, which had inspired his introduction of LGS into the NPPF in the first place. However, officials argued that no indicative area should be included in the guidance because it was for local communities themselves to define what was appropriate in the local context. This localism approach was emphasised by statements in the House of Commons by Greg Clark as minister, for instance:

Question: 'How does the Minister propose that neighbourhood plans could safeguard green areas of land identified for development in existing local plan frameworks?'

Greg Clark: "I am grateful to my hon. Friend for his question. Our hon. Friend the Member for Cheltenham (Martin Horwood) proposed the designation in the first place. Hon. Members will see in the national planning policy framework that we will capture a definition that will allow the people who know green space best – those who live with them – to provide them with the protection for which they have been looking for some time."

(House of Commons Debate 20 June 2011, c14)

So it is for local people and local authorities in local and neighbourhood plans to decide what area is appropriate. In refining the area of the LGS, the Parish Council followed this guidance through its very detailed public consultation to identify which area people most valued and used and why they valued them. It was a process absolutely done to respond to those 'who know the green space best' and to test how strongly each part of the proposed LGS was used and valued. This is captured in the report of the January 2015 public consultation on the revised LGS at Annex B.

The Leckhampton Fields LGS is well contained and coherent, not stretched out, not of indefinite extent or shape. It is surrounded by communities on all sides and is not out of proportion to the scale of communities it serves. It is unified by the extensive network of footpaths, mainly public footpaths, providing many routes of various lengths, running through a variety of landscapes - small fields, allotments, smallholdings, tree covered paths, streams, nurseries, hedgerows, orchards, medieval moat and sunken path, old cottages, and the adjacent medieval manor of Leckhampton Court and medieval church of St Peters (Saxon footings). The history of the area extends back to the Iron Age, with two large Iron Age roundhouses having been excavated on the land just west of Farm Lane. The history may reach back to the Stone Age with the Stone Age settlement on Crickley Hill dating back to 4500 BC or earlier.

All these factors are part of what makes the Leckhampton Field so special to local people, together with the wildflowers, wildlife, deer, sheep, hens and geese, birds and birdsong, tranquility, and also the way that the footpaths are a place for meeting people, for friendliness, neighbourliness, and community spirit, and of course for dog walking and passing the time of day with other walkers and dog walkers. All of this value of the Leckhampton Fields to a large community is again evidenced in the findings of the January 2015 public consultation at Annex B. There is also a bit of literary history. In April 1863 whilst composing *Alice in Wonderland*,

Charles Dodgson (alias Lewis Carol) took Alice Liddell to Leckhampton Hill when she was staying with her grandparents in Charlton Kings. The view from Leckhampton Hill, as it was in 1863, is held to be the chessboard view of fields and hedges in 'Alice Through the Looking Glass'.

In 2015 and 2016, Inspector Ord, at the request of the JCS authorities and with agreement from all parties including all of the developers with an interest in the Leckhampton Fields, carried out a detailed examination of the proposed LGS. This included making two site visits to the Fields and to Leckhampton Hill accompanied by developers in addition to her first site visit in 2015. All parties were asked to submit evidence and the detail in Exam 121A is what Inspector Ord required from the Parish Council to explain the reasons for including each individual area in the LGS and for excluding other areas. If Inspector Ord had doubts about any particular part of the LGS being included she would certainly have expressed these. If anything her doubts were about areas that the Parish Council had excluded from the LGS, namely area ON and areas R2 and R3, where in both cases the Parish Council suggested that it might be possible to allow some development if this was sufficiently sensitive and where in both cases Inspector Ord declined to recommend any development in these areas, limiting development to the Northern Fields – areas NE, NW1, NW2, NW3 and NN but excluding area HB. The Parish Council put the ON and R2 options to Inspector Ord in writing and verbally for reasons of objectivity and fairness to all parties. But the Council believes that Inspector Ord was right to reject them.

So, the process of consulting with local people, of scrutinising the inclusion of each area, providing space for development in excess of that required and consulting with developers and with the planning authority has been very thorough. With the expected Miller Homes development on the Northern Fields and the current development on the land west of Farm Lane, over 600 new dwellings will be provided on the Leckhampton Fields in the 74 ha covered in the 2013 neighbourhood plan concept. Additionally, as discussed earlier, the areas R2, R3 and ON that the Parish Council excluded from the LGS could provide scope for some further housing at a future time if this is suitably well screened and sympathetic to the location. Inspector Ord found that the LGS designation was justified and she found this on the basis of a deep investigation of the extent of the LGS. She could not have found the LGS to be justified if she disagreed with its size.

If the proposed LGS were rejected at this stage it would be hard for this not to amount to a repudiation of Inspector Ord's findings or of the process that she carefully followed in examining the extent of the LGS or of both. It would not even be a matter of inspectors interpreting the wording of the law differently in different contexts, although even that sort of inconsistency between inspectors rankles with the public and can undermine the credibility and public respect for the Planning Inspectorate, a concern that was raised in the Parliamentary Inquiry into the Planning Inspectorate to which you gave evidence on 5 April 2000.

3. Implications of using the GCC land (areas CF1 and CF2) for the school

The reason that the Parish Council included the GCC land CF1 and CF2 in the proposed LGS was in small part to keep it available for a future school playing field as well as being primarily for landscape and amenity reasons (preserving the semirural character of Farm Lane and of the views across the Leckhampton Fields from the east, preserving the public footpath across CF2

as an important part of the footpath network, preserving a good urban edge as viewed from Leckhampton Hill, and keeping any development on the land west of Farm Lane as an outlying peninsular of housing rather than part of an extended Cheltenham conurbation). When in 2015 GCC was planning to sell the land for housing, the Parish Council together with Councillor Iain Dobie, the county councillor for Leckhampton and Warden Hill, sought very hard to persuade GCC to retain and protect this land for a future school because we were very well aware of the public concerns over the shortfall in secondary school places, evident from the public survey we conducted on the JCS proposals in 2012 and from the public consultation on the neighbourhood plan in July 2015 (covering 6000 households). Councillor Dobie escalated the issue to the leader of the County Council, but GCC remained adamant that it would sell the land for housing.

NPPF paragraph 77 explicitly includes playing fields as areas that may be protected as LGS. So if CF1 and CF2 were used solely for a playing field it would not be a problem for this land to be in the LGS. If the school buildings were to be located on the GCC land rather than in area NN, it could still be permitted as a very exceptional circumstance on the same basis that schools have been permitted on green belt land. Including CF1 and CF2 in the LGS would help to ensure that development of the school was sensitive to the location and to the impact on the view from Leckhampton Hill.

The Parish Council could, however, be prepared to remove the GCC land from the proposed LGS subject to the following conditions, which we have discussed with John Rowley.

- a. The first is that the land is actually used for the secondary school. GCC was adamant until Inspector Ord's findings in 2016 that no new secondary school was required and that the land could be used for housing. GCC gave a development option on the land to Davis Homes in 2015. If the land were removed from the LGS, GCC might again reverse its position on the school and might seek once more to sell the land for housing. The problems over traffic congestion and traffic pollution together with the proposed expansion of Leckhampton Primary School could well make the secondary school unviable (Annexes C and D). If the land is not used for the secondary school it should remain within the LGS.
- b. The second condition is that the school buildings, parking and playing field must be located and designed so as to minimise the damage to the landscape, footpath network and view from Leckhampton Hill. The buildings would have the least impact if they were located on area NN and well screened with trees. GCC's current plans, however, are to locate the school building in the north part of CF2 where it will be very visible with no existing trees that can provide screening. Locating the buildings on the east side of field CF1 would seem far better if the buildings cannot be located on area NN. The Parish Council does not know why GCC has proposed locating the buildings so conspicuously in CF2. Possibly the architect was not aware of the landscape sensitivities.
- c. Every effort must be made to preserve the public footpath that crosses the middle of area CF2. This footpath forms part of the Leckhampton Fields circular walk and of circuits round the Leckhampton Fields used particularly by residents in Farm Lane, Kidnappers Lane and the Lanes Estate. The Redrow development of 377 new dwellings will increase the population on the west side of the Leckhampton Fields to around 1500. So preserving the footpath across CF2 is important for this increasingly large community. GCC Education

stated in the Examination hearing that they wish for reasons of safeguarding to enclose the school grounds. It should be possible, we believe, to have two enclosures with the footpath running between them. Many schools have more than one playing field.

- d. As was proposed in the JCS masterplan, a public footpath must be provided along Hatherley Brook through areas CF1 and CF2. Together with the footpath along Hatherley Brook in area HB this would provide a green corridor along Hatherley Brook all the way from the A46 to Church Road and to the Cotswold escarpment. The footpath close to the brook would be on land that cannot be used for other purposes because the brook experiences torrential flows in major storms. In the 30 year storm on 20 July 2007, the flow along Hatherley Brook was so violent that it washed out Church Road.
- e. The line of trees along Hatherley Brook also needs to be preserved and enhanced because of its importance both to the landscape and for screening.
- f. The semi-rural character of Kidnappers Lane north of CF1 must be preserved in the same way that Miller Homes are planning to do for their development on area NN by protecting and thickening up the hedgerows along Kidnappers Lane south and west of NN.

4. Options to reduce the size of the LGS

The 39 ha area was calculated by CBC and is actually about 3 ha smaller than the 42 ha area of the LGS proposed by the Parish Council and examined by Inspector Ord. This difference is probably because the 39 ha does not include area HB along Hatherley Brook (1.0 ha) and the various buffer strips of JCS that the Parish Council included along Moorend Stream and along the east and south boundary hedge of R2. CBC argues that the LGS boundary will be more clearly defined if it follows clear field boundaries and streams. CBC also argues that the east side of the Moorend Stream green corridor would be better protected by planning policy on green corridors. CBC also says that the screening hedgerows between R1 and R2 would be better protected by strict constraints in any planning approvals. The Parish Council has however had an unfortunate experience recently where planning constraints have not proved sufficiently powerful. This was in the development of 40 houses at Leckhampton View on the Leckhampton Road adjacent to the AONB, the development that you may recall was flooded on 12 June 2016 and was discussed in the Examination session on flooding. The hedgerow and large trees along the development's south boundary with the AONB were required to be retained to provide screening of the development as viewed from the AONB and Leckhampton Hill. But they were cut down by the developer, it is claimed with the agreement of CBC. Nevertheless, in the interest of minimising the area of the LGS, the Parish Council would agree to remove the buffer strips provided that CBC can give absolute assurance about protecting the Moorend Stream green corridor and protecting and enhancing the screening hedgerows and other screening as necessary through planning permissions.

There are a few other minor boundary revisions that might be made to reduce the LGS area. The medieval moat and area that is the site of a long lost medieval manor that the moat surrounded do not need to be included in the LGS as they are already well protected as an ancient monument. This is an area of 0.4 ha. There are also cottages in the LGS that are currently included in the 39 ha. It would make sense to remove these from the LGS as they are

private dwellings and any development would be subject to normal planning constraints relating to the setting or listed status. The garden at Cherrington's Nursery on Kidnappers Lane has also been included in the LGS and can be removed. Together with the 0.4 ha of the moat this should allow about 2 ha to be removed possibly reducing the LGS area to about 37 ha, or to 31 ha if CFI and CF2 were removed. An area of 37 ha is still a 50% reduction on the 74 ha LGS that was initially proposed in 2013.

Area HB along Hatherley Brook between areas NE and NW1 was included in the LGS to protect the line of trees along Hatherley Brook and to provide a footpath route from the A46 to the smallholdings footpath to replace the current route along the smallholdings access track. This track will be lost as a result of development on area NE. Currently the draft plan for the development which has been discussed in detail between Miller Homes and the Parish Council includes both the footpath and the protection of the trees and also includes some land to the west of area HB used for the balancing ponds for the development. Provided this is carried forward into the planning application and approval, area HB is not required in the LGS. However it is likely that area HB had already been removed by CBC in calculating the 39 ha. Similarly although the Local Plan shows Kidnappers Lane as being part of the LGS, the area of the road surface which totals 0.4 ha also appears to be already excluded from the 39 ha.

5. Strategic perspective

Inspector Ord, council officers and residents spent a great deal of time in the consideration of the Leckhampton Fields at the JCS Examination in Public. Inspector Ord was requested by JCS officers to examine the proposed LGS. This was entirely appropriate with the Leckhampton Fields being a JCS strategic allocation. Before accepting this task she obtained agreement from all concerned, including all the developers, as she reminded them when she delivered her findings.

The Leckhampton Fields have been the subject of planning applications and appeals since the early 1970s, with the planning authorities and inspectors each time concluding that the landscape and amenity of the area outweighed the case for more housing in the area. However, in 2006 the SW Regional Spatial Strategy, on extremely cursory grounds, proposed locating 2000 new homes south of Cheltenham. The early JCS planning was done in the context of the Regional Spatial Strategy (RSS) and although the RSS was formally revoked in 2010 it was still very influential up to 2012 and the Leckhampton Strategic Allocation that derived from the RSS was locked into the JCS until it was eventually removed by Inspector Ord in 2016.

The approach adopted by the Parish Council and the neighbourhood forum has been from the outset to find the right balance between finding land for housing to help meet the very large housing need projected by the JCS and protecting the most important landscape and amenities of the Leckhampton Fields. The LGS concept introduced into the NPPF by Martin Horwood as Cheltenham's MP and based on the Leckhampton Fields provided the instrument to achieve this balance in consultation with local people in accordance with the Localism Act and the NPPF. We strongly believe that the LGS that was proposed and examined by Inspector Ord achieves the right balance, including for future generations that will use the Leckhampton Fields as well as for the present.

It is the great achievement of the Planning System over the past 60 years that in this country with comparatively little area and a huge population we have managed to preserve so much beauty and recreation space and such a fine environment to live in. Good planning is expensive and takes a lot of time but it is one of the greatest and most long lasting national achievements, especially when you compare the UK with other nations such as the US that have had much more space but have been far less careful over how best to use it and make it available locally to residents, particularly in cities and towns. Accessible national parks, AONBs, town parks, LGS, village greens, allotments, town squares and public footpaths are all part of the great heritage that Planning has given to the UK. Having countryside close to where people live is very beneficial for physical and mental health and well being, and this is being recognised more and more. The introduction of LGS in the NPPF has been an important step forward and the role of larger LGS in putting semi-rural landscape within towns deserves more emphasis. The designation of the Leckhampton Fields LGS will help this. Conversely, not to designate the Leckhampton Fields, which inspired the introduction of LGS in the first place, would be sad for the Planning System as well as for local people.

The Leckhampton Fields will be providing over 600 new homes, all on land that is of high community and landscape value in one way or another. The land west of Farm Lane where the Redrow Estate is being built was judged in the JCS to be land of highest landscape and visual sensitivity. It possessed the best views of Leckhampton Hill and magnificent ancient hedgerows. It is not surprising that Inspector Ord tried, unsuccessfully, to protect this area west of Farm Lane from being developed. Development on the Northern Fields, if it is more than the 200 dwellings advocated by Inspector Ord, will largely obliterate the much loved 'pig field view' from the corner of Kidnappers Lane and the A46. This view, with its backdrop of the varied trees along Hatherley Brook and along area NN is greatly appreciated by local people and by drivers on the A46 and it is prized by Cheltenham Borough Council as a gateway view into Cheltenham. Any development on the Leckhampton Fields comes at a high price in terms of landscape, which is why development was rejected by inspectors in the past..'

The issue of severe cumulative traffic congestion is a very big constraint on development. It is not just the development at Leckhampton that will add to the traffic but also the 1500 new houses at North Brockworth and the 200 now planned at Shurdington. Moreover, even if the problem at the A46 / Moorend Park Road junction were solved the congestion would just move to the already congested Bath Road shopping area and The Park. Indeed, despite the assurances given by Miller Homes and Gloucestershire Highways at the Transport Session on 27 February, it still remains to be seen whether the proposed development on the Northern Fields will actually prove sustainable in traffic terms if one adds the likely traffic to the proposed new secondary school (see Annexes C and D).

6. Closing comments and supporting information

With this letter we are attempting to provide the important references and to present part of the evidence given to Inspector Ord in the EiP public sessions on LGS. The best referenced summary on the LGS was provided by Inspector Ord herself in her Interim/Final Report – JCS EXAM 232 ^[12]. She made recommendations for Leckhampton at paragraphs 102, 103 and the Leckhampton section paras 112 to 174 making the case for LGS and removal of the

Leckhampton Strategic Site. Inspector Ord made three formal visits to Leckhampton, and considered additional evidence by many parties. She reiterated her recommendations from her Preliminary Report ^[11] of the importance of the *'setting of the Cotswold Hills AONB and the high landscape and visual sensitivity of the site'* and the negative impact on the *'stunning views from Leckhampton Hill/Cotswold Way'* if large scale development were to be implemented.

This judgement is entirely consistent with past Inspectors who have protected the Leckhampton Fields. For this evidence, please see our original Concept and LGS application of July 2013, ^[7] section '3.4.4 *Previous Inspectors Reports and Inquiries*' and table 2 *'Recommendations from Inspectors'* going back to 1993. There is also our planning concept document ^[7] and our emerging neighbourhood plan ^[20] for a summary of the evidence, history and background to the Parish of Leckhampton and Warden Hill. The Parish Concept and LGS application was a direct response to the aim of the Localism Act and the simplified planning system introduced through the 2012 National Planning Policy Framework (NPPF) to actively encourage more public involvement in planning for their locality.

In her final report, Inspector Ord states that, *'the case for Local Green Space designation within both the proposed North West Cheltenham and Leckhampton urban extensions has been made'*.

We hope you find some of the reference documents useful and would be very happy to provide electronic ^[Links provided below] or printed copies if you request.

Yours sincerely

Cllr. Dr Adrian Mears CBE
retired Chairman

Cllr. Chris Nelson
Chairman (from May 2019)

REFERENCE LIST

- [1] National Planning Policy Framework – Government planning Policy published in February 2019
- [2] Joint Core Strategy for Gloucester, Cheltenham and Tewkesbury, Adopted 2018
- [3] Cheltenham Borough Local Plan 2018 – Examination in Progress – [published here](#)
- [4] Landscape and Visual Appraisal November 2017, LEPUS Consulting Ltd. October 2017 [118 pp]
LC-315_Leckhampton_Warden_Hill_LVA_6_281117WE.docx - [published here](#)
- [5] River Habitat Survey of Hatherley Brook and Moorend Stream, LEPUS Consulting Ltd. October 2017 [46 pp] LC 318_Leckhampton_Warden_Hill_RHS_11_201017EN.docx – [published here](#)
- [6] Land at Farm Lane/Church Road Leckhampton, Cheltenham, Landscape and Visual Appraisal (Final Report) – Landscape Design Associates, Oxford, 32pp, July 2003 - [published here](#)
- [7] Leckhampton with Warden Hill Parish Council Neighbourhood Planning NPPF Concept Plan & Local Green Space Application, July 2013, 75pp - [published here](#)
- Authors:
Parish Councillors: Cllr. Dr Adrian Mears CBE, FInstP and Cllr. Viv Matthews.
Neighbourhood Forum Members: Mrs Margaret White, Dr Elizabeth Pimley PhD (Cam), CEnv, MIEEM and Cllr. Ian Bickerton CEng, MIET.
National Planning Policy Framework & the Natural Choice: Martin Horwood MP.
Leckhampton History: Mr Eric Miller and Mr Terry Moore-Scott.
Ecology, Wildlife & Habitat: Dr Elizabeth Pimley PhD (Cam), CEnv, MIEEM, Prof Adrian Philips CBE, IUCN, WCPA and Mr Ray Woolmore DipTP, MRTPI, FRGS.
- [8] CBC Engaging Communities Project Report, Part 2, Chapter 4 – Leckhampton, GRCC. January 2017 – [published here](#) and LGS Checklist – [published here](#)
- [9] Letter from the Cheltenham Chamber of Commerce to CBC Planning Committee on the concern over increasing traffic congestion on the A46 trunk road due to large scale uncontrolled development in Leckhampton and the request for more traffic modelling – April 2015.
- [10] Report to the Secretary of State for Communities and Local Government by P W Clark MA MRTPI MCMI. Inquiry held on 22 – 25 September and 29 September – 2 October 2015. Land at Kidnappers Lane Leckhampton, Cheltenham. File Ref: APP/B1605/W/14/3001717 11 January 2016 AND Secretary of State covering letter, Julian Pitt, APP/B1605/W/14/3001717, 5 May 2016 - [published here](#)
- [11] Inspector's Preliminary Findings on Green Belt Release Spatial Strategy and Strategic Allocations - EXAM 146, 18th Dec. 2015 - [published here](#)
- [12] Inspector's Interim Report – EXAM 232, 31st May 2016 [published here](#)

- [13] Leckhampton with Warden Hill Parish Council Neighbourhood Planning Revised Local Green Space Application - Dec 2015, EXAM 121A. Accessed on 11/10/17. Available at: <http://www.gct-jcs.org/PublicConsultation/Gloucester,-Cheltenham-and-Tewkesbury-Joint-Core-Strategy-Examination-Document-Library.aspx> and http://www.leglag.org.uk/LEGLAG/News/Entries/2015/12/6_Local_Green_Space_Application__a_Community_led_Planning_Proposal_files/LWWHPC%20LGS%20Common%20Ground%20for%20%20Inspector%20Ord%20Dec%202015%20v05-1.pdf
- [14] EBLO 106 JCS Landscape and Visual Sensitivity (Oct 2012), South Cheltenham is section 6, p14-17, extract [E1]. Accessed on 11/10/17. Available at: <http://www.gct-jcs.org/PublicConsultation/Gloucester,-Cheltenham-and-Tewkesbury-Joint-Core-Strategy-Examination-Document-Library.aspx>
- [15] ENAT 100 JCS Greenbelt Assessment (Final, Sept. 2011), sections (5.2.6), (5.4.5) and (7.3.8). Accessed on 11/10/17. Available at: <http://www.gct-jcs.org/PublicConsultation/Gloucester,-Cheltenham-and-Tewkesbury-Joint-Core-Strategy-Examination-Document-Library.aspx>
- [16] E104 JCS Halcrow Strategic Flood Risk Assessment level 2, (Final July 2012), reference site T10 (SD2), section 7. Accessed on 11/10/17. Available at: <http://www.gct-jcs.org/PublicConsultation/Gloucester,-Cheltenham-and-Tewkesbury-Joint-Core-Strategy-Examination-Document-Library.aspx>
- [17] Cotswolds AONB Conservation Board – Position Statement 2010 – Development in the Setting of the Cotswolds AONB.
- [18] MIND Ecotherapy – the green agenda for mental health, 2007
- [19] Benefits of Green Space – Recent Research April 25, 2011, ENVIRONMENTAL HEALTH RESEARCH FOUNDATION
- [20] Draft Leckhampton and Warden Hill Parish Council Neighbourhood Plan 2019 – 2031 [published here](#)

JOINT CORE STRATEGY CORE REFERENCE DOCUMENTS

- [21] EXAM 121 LHHWPC Priorities for the Leckhampton fields green space
- [22] ENAT 101 Habitats regulations assessment – screenings report (Dec 2011)
- [23] ENAT 106 Ecological Survey Work (Cheltenham 2010, 2011, 2012, Gloucester 2006, 2010: Tewkesbury 2009, 2010, 2011)
- [24] ENAT 107 Joint Core Strategy Historic Environment Assessment (Mar 2014)
- [25] ENAT 108 Green Infrastructure Strategy (2014)
- [26] EXAM 107 Natural England Greenspace Guidance June 2010

Annex A – Evolution of the Leckhampton Fields LGS

2011	Martin Horwood MP for Cheltenham introduced his Local Green Space (LGS) concept into the emerging NPPF based around the Leckhampton Fields as the example of a large LGS.
2012	Neighbourhood forum set up to develop a neighbourhood plan concept with membership from Leckhampton with Warden Hill Parish Council (LWWH PC), Shurdington Parish Council, Leckhampton Green Land Action Group (LEGLAG), with Borough Councillor Ian Bickerton chairing and with various expert members including Martin Horwood MP and Charlie Watson, chairman of CPRE Gloucestershire.
2012	The Parish Council engaged in discussions with Bovis Homes and Miller Homes over various options for development on the Leckhampton Fields, the major issue being how to solve the traffic congestion in Church Road. This included public presentations by Bovis-Miller.
2012	LWWH PC carried out a consultation of local residents in September on the JCS proposals for a strategic allocation at Leckhampton for up to 1300 houses, a primary school, GP surgery, care home / cottage hospital, small local supermarket and other business/industrial premises with the provision of sports pitches, allotments and open space. Of the 184 returns, 143 were strongly against, 25 were against, 8 were neutral, 4 were in favour, 2 were strongly in favour and 2 omitted to say. 89 returns cited the shortage of secondary school places as a major concern. 176 returns cited traffic congestion as a major concern, notably on the A46 and in Church Road. 136 returns were concerned about loss of green space and 120 about the impact on the view from Leckhampton Hill.
2012	In September and October, reflecting public concern over traffic, LWWH PC carried out a traffic survey in Church Road in the morning traffic period. This covered all five weekdays and included a day on which Church Road gridlocked with traffic queues stationary for over 5 minutes.
2013	During February to April, LWWH PC carried out traffic surveys in the 07:00 to 09:15 peak morning traffic period at all junctions along the A46 down to the A417 roundabout and in Leckhampton Lane and Farm Lane, and also surveys driving in the A46 traffic stream to measure journey times and speeds and vehicle spacing in the queue. A traffic model was constructed based on the data, with assistance from a professional traffic expert, and this indicated that the proposed JCS strategic allocation at Leckhampton together with the proposed 1500 new homes at North Brockworth would be likely to lead to very severe traffic congestion.
2013	The Parish Council engaged in further discussions with Bovis Homes and Miller Homes over various options for development on the Leckhampton Fields with the traffic congestion remaining a key problem and with various proposed remediation schemes proving unviable. A scheme suggested by the Parish Council to use traffic lights to control the traffic flow on the Leckhampton Lane – Church Road route was rejected as unworkable by Gloucestershire Highways.
2013	The Neighbourhood Forum produced a Neighbourhood Planning Concept for the Leckhampton Fields which included the proposal for a Local Green Space provisionally covering all of the green space in the Leckhampton Fields, around 58.5 ha in the part of the Fields in Cheltenham and 15.4 ha on the land west of Farm Lane in Shurdington Parish (Tewkesbury Borough). This was submitted to Cheltenham and Tewkesbury Borough Councils in August. It included the findings from the traffic surveys and analysis of the implications of various JCS options including the location of employment areas.
2013	In September 2013, Bovis Homes and Miller Homes submitted an application for up to 650 houses on the land east of Kidnappers Lane identified for development in the draft JCS Strategic Allocation masterplan.

2014	The Parish Councils expected to negotiate with Cheltenham and Tewkesbury Borough Councils over the proposed Leckhampton Fields LGS but the planners did not respond. In response to pressure from LWWH PC, Cheltenham Borough Council took legal advice in April 2014 and concluded that the LGS application could not be ignored in the JCS and that the best way to handle it would be, if possible, through the JCS Examination in Public.
2014	In July 2014 CBC planning officers recommended acceptance of the Bovis-Miller application but the CBC Planning Committee rejected it on grounds primarily of landscape damage to the Leckhampton Fields and of severe traffic congestion. This decision amounted to a rejection of the JCS Strategic Allocation at Leckhampton as proposed in the draft JCS.
2014	In August, Redrow submitted a planning application to Tewkesbury Borough Council to build 376 dwellings on the part of the proposed LGS on land west of Farm Lane.
2014	LWWH PC was advised by CBC to revise the proposed Leckhampton Fields LGS so as to provide sufficient development land for at least 450 dwellings, the minimum number required to keep Leckhampton as a strategic allocation.
2014	In October 2014, Cheltenham Borough Council initiated a study through Gloucester Rural Community Council (GRCC) to look at all of the potential LGS areas in the Cheltenham Borough as part of the development of the new Cheltenham Plan.
2014	Despite the rejection of the Bovis-Miller application, the Leckhampton strategic allocation was retained in the draft JCS submitted by the three councils in November 2014.
2014	The neighbourhood forum revised the LGS to provide land for at least 450 dwellings by removing the northern fields (subsequently defined as areas NE, NW1, NW2, NW3 and NN) and most of the land west of Farm Lane. On the land west of Farm Lane, the revised LGS retained a wide buffer of land along Leckhampton Lane to protect the rural character of the lane with this buffer widening to the west. This widening was to avoid the housing extending too far across the view from Leckhampton Hill along the 'green corridor' of the Green Belt and Staverton Airport. The revised LGS also preserved in the north east corner of the site some part of the land that had been previously used as a recreation and play area by residents in the adjacent Lanes Estate and Farm Lane (also the site of the two Iron Age roundhouses).
2014	On the advice of GRCC, three further areas of land (areas R2, R3 and ON) were removed from the LGS on the basis that some development might be possible on parts of this land if it was sufficiently sympathetic and well screened. In all cases the screening required the planting of large new trees and enough time for these to become sufficiently mature. So this land was identified primarily for longer term development beyond the 2031 timeframe of the JCS.
2015	In January, LWWH PC submitted the revised LGS to public consultation. The Council distributed about 4600 leaflets and questionnaires covering 80-90% of homes within 0.7 miles (15 minutes walk) of the Leckhampton Fields. Because of the deadline to submit the revised LGS application and evidence to CBC by 26 January, the time available for the consultation was very short and some residents had as little as two days to respond. Of the 4600 forms distributed, a total of 762 were returned by the 24 January closing date and a further 19 that were in the post were received by 28 January making a total of 781 forms by the deadline. Given the very short timescale and the fact that postage was not prepaid, this was considered to be a good response rate (17%) and a mark of the importance of the LGS to local residents.
2015	In June and July, LWWH PC undertook a public consultation for the neighbourhood planning distributing nearly 6000 leaflets and questionnaires to local households. The questionnaire included questions about the sort of housing and infrastructure that residents felt was most appropriate on the Leckhampton Fields. The consultation sought views on retirement housing and retirement village concepts as they would add much less traffic to the morning peak period congestion. However Miller Homes, who have development control on the Northern Fields, subsequently rejected retirement housing on the basis that Cheltenham already has plenty of retirement properties.

Annex B

Report from the Public Consultation on the Protection of Local Green Space in South Cheltenham conducted in January 2015

This report describes the findings of the public consultation conducted by Leckhampton with Warden Hill Parish Council (LWWH PC) from 14 to 24 January 2015 concerning the updated proposal for a Local Green Space (LGS) on the Leckhampton Fields.

1. Background

The Leckhampton Fields lie mainly in Leckhampton with Warden Hill (LWWH) Parish in Cheltenham Borough but partly also in Shurdington Parish, which is in Tewkesbury Borough. The two parish councils have co-operated on the LGS application.

The application was originally submitted by the two parish councils to Cheltenham Borough Council (CBC) and Tewkesbury Borough Council (TBC) in August 2013 as part of a neighbourhood plan (NP) concept for the area. Together with the NP Concept, it was accepted as an input to the Gloucester-Cheltenham-Tewkesbury Joint Core Strategy (JCS). The LGS will be an issue for the Examination in Public (EiP) of the draft JCS in May 2015 and this report forms part of the evidence for the JCS EiP.

In the original LGS application all parts of the Leckhampton Fields were included in the proposed LGS. This was based on the argument that all of the area merited inclusion for its landscape and amenity value and for its importance to the AONB and to the nationally significant views from Leckhampton Hill. Preservation of all of the area for its amenity and landscape value had been strongly recommended by the Planning Inspectorate following an inspection in 1993 and also strongly recommended in 2003 following a study by landscape consultants for Cheltenham Borough Council. The conclusion in both cases was that the high landscape value and largely unspoiled rural character of the area were fragile and would be easily spoiled by allowing any significant development.

In September 2013, Bovis Homes and Miller Homes submitted a planning application to build up to 650 new dwellings, primary school, care home, surgery and commercial centre on part of the area included in the LGS. This application was refused by Cheltenham Borough Council Planning Committee in July 2014 and is subject to an appeal due to be heard in September 2015.

In August 2014, Redrow submitted a planning application to Tewkesbury Borough Council to build 376 dwellings on the part of the proposed LGS that lies in Shurdington Parish. The site, known generally as White Cross Green or by its outdated planning designation of SD2, was identified by the JCS Landscape and Visual Sensitivity and Urban Design report in 2012 as land of high landscape significance. The JCS report recommended that there should be no development on the site or at most that development should be confined to only one of the four fields. However, the Redrow application (14/00838/FUL) has proposed building on the whole area of the site. The application is expected to go to the TBC Planning Committee later in 2015.

Despite the rejection of the Bovis-Miller planning application by Cheltenham Borough Council, the Leckhampton Fields were included as a strategic development site in the draft Gloucester-Cheltenham-Tewkesbury Joint Core Strategy (JCS) that was submitted by the three councils in November 2014. This inclusion is subject to the forthcoming JCS Examination in Public. If the

EiP upholds the designation, then at least 450 new dwellings must be accommodated on the land as this is the minimum number for a strategic development site.

2. Revisions to the proposed Local Green Space

The original LGS proposal included all of the Leckhampton Fields, but in the NP Concept the councils actually examined four options, three of which (options 2, 3 and 4) included some development on the parts of the Leckhampton Fields bordering the A46. Part of the reason for rejecting these three options was the evidence that they would not be sustainable. Whether or not any development on the Leckhampton Fields can be sustainable depends particularly on whether a solution can be found to the problem of traffic congestion in south Cheltenham and to the risk that, taking into account predicted general traffic increases, development on the Leckhampton Fields would cause the fragile traffic system to collapse in the morning peak traffic period. As part of its neighbourhood planning, LWWH PC carried out traffic surveys of the morning peak traffic queue and congestion over a total of 35 days in 2012 and 2013. With professional advice from a traffic consultant, the data was used to construct a traffic model to investigate the implications of various development scenarios. The Parish Council also engaged in discussions with a consortium of developers over various options for development on the Leckhampton Fields.

In October 2014, Cheltenham Borough Council initiated a study through Gloucester Rural Community Council (GRCC) to look at all of the potential LGS areas in the Cheltenham Borough as part of the development of the new Cheltenham Plan. In the context of this study, and in light of the JCS designation of the Leckhampton Fields as a strategic development site, LWWH and Shurdington parish councils considered whether, ignoring the issues of sustainability, any areas might be taken out of the proposed LGS. A revised LGS was put forward based on the following changes:

1. To exclude the fields at Brizen Farm as these had been designated as green belt.
2. To adopt option 3 of the four considered in the NP Concept. This excludes from the LGS most of the fields adjacent to the A46, referred to as 'the Northern Fields'. It preserves the smallholdings immediately north of the public footpath and the smallholdings south of the footpath. The Northern Fields have public access only on the footpath and vehicle track and they are sufficiently far from the Leckhampton Hill that appropriate development could be acceptable.
3. To remove from the LGS the area of orchards and nurseries east of Kidnappers Lane because this area is not accessible to the public and, although it is close to the AONB, it is quite well screened by hedgerows and trees round the perimeter and within the site and by a row of tall poplars in Kidnapper Lane. Careful sympathetic development that retains and increases the screening and trees and is in keeping with the semi-rural setting could be acceptable.
4. To remove from the LGS most of the White Cross Green area because, although the 2012 JCS 'Landscape and Visual Sensitivity and Urban Design' report recommended that this area should be preserved for its high landscape sensitivity, TBC would have great difficulty in resisting development on this site as Tewkesbury does not have a valid local plan or a sufficient 5 year land supply.

The rationale and analysis underlying these changes and the reasons for retaining the rest of the land within the LGS formed part of the submission on 26 January 2015 to CBC and TBC through GRCC. This is attached at Appendix 1 including a map of the revised LGS.

3. Public consultation

LWWH PC decided at its public meeting on 9 January 2015 that it should undertake a full public consultation on the revised LGS proposal. The consultation was done through a public meeting held on 14 January 2015 and by distributing a leaflet with questionnaire to local residents living within 15 minutes walk of the Leckhampton Fields.

The public consultation leaflet asked seven questions. Questions 1 to 4 were multiple-choice and their purpose was to find out:

1. How many local people use the Leckhampton Fields and how often
2. In what ways people use the Fields
3. Which areas and footpaths people particularly use
4. What people most value about the Leckhampton Fields

Questions 5 to 7 asked local people to say in their own words:

5. How important the Leckhampton Fields are to them and why
6. How important the views of Leckhampton Hill are to residents and to Cheltenham
7. How much local people believe the views would be damaged if development came closer to the Hill.

The consultation also asked residents to comment on the suggested revisions to the LGS, either in support or disagreement, and to identify if there were any other areas still included in the proposed LGS that they believed could be removed.

The Council distributed about 4600 leaflets covering 80-90% of homes within 0.7 miles (15 minutes walk) of the Leckhampton Fields. Shortage of time and of leaflets meant that some roads to the north in the area of The Park were omitted. This omission was unfortunate, but it is only likely to have affected the analysis in Table 6.

Because of the deadline to submit the revised LGS application and evidence to CBC by 26 January, the time available for the consultation was very short and some residents had as little as two days to respond. Of the 4600 forms distributed, a total of 762 were returned by the 24 January closing date and submitted to GRCC on 26 January together with a preliminary analysis. Collection of further forms ceased on 26 January, but 19 forms that were in the mail and received by 28 January have been included in the more detailed analysis presented in this report, making a total of 781 forms.

In total, 736 households responded to the consultation by 28 January; the number of respondents included in the analysis was 1510. This is a 16% return rate, which is fairly reasonable given the very short time people were given to respond. As discussed below, the analysis suggests that most of the local residents who regularly use the Leckhampton Fields did reply to the consultation.

The majority of forms were returned by an individual resident or by a couple. Some forms included other adults in the household and some included children. Two forms contained returns from more than one household and one form was returned by a local walking group. The distribution is shown in Table 1 below.

	Forms from one household or less (some households returned separate forms for each adult)							Forms with more than one household		Walking group	Total
	1	2	3	4	5	6	7	3+2+2	4+4		
Respondents per form										14	
Number of forms	280	386	45	47	15	4	1	1	1	1	781
Number of respondents	280	772	135	188	75	24	7	7	8	14	1510

Table 1: Questionnaires returned and number of respondents

4. Multiple-choice questions (questions 1 to 4)

The initial analysis submitted to GRCC used the raw responses to the multiple-choice questions 1 to 4. The responses on each form were simply multiplied by the number of respondents on the form. This raw analysis is shown in Table 2. The column headed 1510 includes all of the respondents. The column headed 1407 limits the number of respondents to 3 per form as a rough-and-ready way to reduce the effect of including children in the response. This is on the assumption that a third member of a household may well be adult but that further members are more likely to be younger children.

In the more detailed analysis described in this report, weightings have been applied based on the assumptions that:

- a) For forms with more than one respondent, the stated usage is likely to reflect the respondent who uses the field most often and the average across all of the respondents on the form is likely to be less. For example, one person in the household may walk the dog daily but other members may join in less often. On the other hand, in a household where the main respondent uses the fields only occasionally, the other members of the household may also be occasional users. The actual weightings are shown in Table 3. For the principal or sole respondent on the form, it has been assumed that 'daily or more often' equates to 320 times a year, 'almost daily' to 210 times a year, 'few times a week' to 105 times a year, 'many times per month' to 60 times a year, 'few times a month' to 25 times a year, and 'occasionally' to 12 times a year.
- b) The four activities of walking, dog walking, jogging and playing are likely to be separate activities. If more than one of these activities has been ticked, the stated usage is distributed across the ticked activities, taking account of double ticks.
- c) In estimating how much each area of the Leckhampton Fields is used, one should allow for how many areas an individual respondent uses each time. If an area is double ticked it suggests other areas are used less often. Ticking 'circular walks' makes it more likely many or most fields/paths ticked are used each time.

Number of responses counted		1510		1407		1510	1407
1 tick = important; 2 ticks = very important		1 tick	2 ticks	1 tick	2 ticks	1 + 2 ticks combined	
Question 1: How often do you use the fields / paths?	Daily or more	25		22		2%	2%
	Almost daily	367		334		24%	24%
	Few times per week	306		276		20%	20%
	Many times per month	299		280		20%	20%
	Few times per month	264		256		17%	18%
	Occasionally	217		208		14%	15%
Question 2: How do you use the fields? (Please tick all that apply; double tick if particularly important to you).	Walking	1012	284	945	265	86%	87%
	Dog walking	382	146	349	133	35%	35%
	Running / jogging	309	42	270	37	23%	22%
	Playing games	210	7	174	7	14%	13%
	With children	550	131	493	117	45%	44%
	Relaxing	627	88	577	82	47%	47%
	Other	279		259		18%	19%
Question 3: What areas / paths do you particularly use? (Tick / double tick all that apply).	Lotts Meadow	811	252	759	220	70%	70%
	KL/FL/CR triangle	1016	255	949	229	84%	85%
	White Cross Green	495	136	448	129	42%	42%
	Moorend Stream Path	755	149	685	135	60%	59%
	Path in smallholdings	724	119	652	114	56%	55%
	Robinswood	539	74	490	68	41%	40%
	Circular walks	715	80	654	72	53%	52%
Question 4: What do you most value? (Please tick all that apply; double tick any particularly important to you)	Opportunity for exercise	813	456	764	411	84%	85%
	Views of Leckhampton Hill	855	491	810	442	89%	90%
	Views across the fields	860	411	807	371	84%	85%
	Wildflowers	789	167	727	153	63%	63%
	Trees	926	211	854	195	75%	76%
	Orchards	571	65	516	57	42%	41%
	Hedgerows	868	184	794	176	70%	70%
	Rural atmosphere	942	379	884	342	87%	88%
	Variety	573	61	521	54	42%	41%
	Tranquillity	858	308	804	280	77%	78%
	Farm animals	739	161	690	139	60%	60%
	Horses	479	76	451	56	37%	37%
	Birds	836	200	775	192	69%	70%
	Wild animals	706	173	646	158	58%	58%
	Old nurseries	348	27	307	23	25%	24%
	Smallholdings	465	77	429	65	36%	36%
	Network of footpaths	855	325	796	293	78%	78%
	Circular walks	631	161	582	151	52%	53%
	Medieval moat	459	64	415	62	35%	34%
	Ponds	497	59	448	56	37%	36%
Streams	690	153	638	134	56%	56%	
Medieval cottages	494	101	455	91	39%	39%	
Wilderness areas	620	158	560	143	52%	51%	

Table 2: Raw data for question 1 to 4 (1 tick = important; 2 ticks = particularly important)

1 st , 2 nd , 3 rd , 4 th , 5 th & 6 th respondent	Times per year the Fields are assumed to be used by each respondent in a household when first respondent uses the Leckhampton Fields -					
	daily or more	almost daily	few times per week	Many times per month	few times per month	only occasionally
1 st	320	210	105	60	25	12.0
2 nd	166	110	54	32	16.9	10.4
3 rd	105	76	39	24	13.9	9.9
4 th	68	54	30	18.6	12.0	9.5
5 th		40	24	15.1	10.6	9.3
6 th		29	18.9	12.5	9.5	9.1

Table 3: Assumed usage (days per annum) for successive respondents on a form.

From Table 3 and assumptions b) and c) above, Table 4 shows the estimated number of people per day that on average are engaged in each type of activity on the Fields. It can be seen that the estimates are fairly insensitive to how the double ticks are weighted. The table also shows the effect of limiting the number of respondents to 3 per form or 3 per household in the cases where more than one household has responded on the same form. The results are very similar, showing that including large households does not materially affect the analysis.

	Walking	Dog walking	Running / jogging	Playing games	With children	Relaxing
All respondents double tick weight = 1	130	105	29	16	70	81
All respondents double tick weight = 2	132	107	27	14	75	84
All respondents double tick weight = 3	133	108	26	14	80	87
Maximum 3 per household/form double tick weight = 2	129	104	25	13	72	82

Table 4: How people use the Leckhampton Fields (questionnaire question 2)

The questionnaire also asked people to say if there were other ways they use the fields that have not been included in the multiple-choice options. The responses on this are summarised in Table 5 below. One notable 'other use' identified is for outdoor activities by the Bethesda Scout Group. The Group has over 100 young people. Its meeting place in Great Norwood Street has no land for outdoor activities. Leckhampton Fields are in walking distance and used by the Group regularly all the year round.

Other ways the Leckhampton Fields are used	Number of respondents / users	Number of forms
Birdwatching, watching wildlife	68	42
Children's nature walks and education about nature	16	7
Bethesda scout group (100 young people regularly)	about 100	1
Picking blackberries, sloes, damsons, gathering manure	59	31
Cycling including safe cycling with children	14	9
Family life, adventure, exploring, picnics and other activities	22	8
Meeting and making friends, other social activities	10	7
Flying kites and remotely controlled planes/helicopters	7	3
Looking at the views from the road, wheel-chair access to views	4	2
As a safe route to allotments and other locations	25	15
Working on field, tending livestock, horses	14	6
Drawing, painting, photography	24	12
Enjoying the views, fresh air, open space	23	16
Reflecting, meditation, prayer, recharging	15	7

Table 5 – Other ways respondents say they use the Leckhampton Fields

Table 6 below shows the weighted estimates for how many people use each part of the Leckhampton Fields each day averaged over the year. In the case of Lotts Meadow one can compare this calculated usage with a survey of the actual usage conducted over the period of a week in June 2011. The survey results are shown in Table 7. The weather conditions during this survey were recorded as being 'relatively cool with patchy sunshine, light winds, clouds and a few light showers'. So the results should be reasonably representative of the usage for the summer months.

The survey average of 162 people per day in June 2011 is reasonably consistent with the estimates for Lotts Meadow of 122 – 135 in Table 6. One would expect the average over the whole year to be lower than for June because of the shorter hours of daylight in the winter months and also because Lotts Meadow can be quite waterlogged in winter. This agreement gives reasonable confidence that the estimates in Table 6 for other parts of the Leckhampton Fields are also broadly correct.

Double tick weighted by a factor of	Lotts Meadow	Church Rd / Farm Lane / Kidnappers Lane triangle	White Cross Green	Moorend Stream Path (A46 to Lotts Meadow)	Small-holding paths	Robins-wood Field and paths	Circular Walks
Unweighted	122	150	54	100	103	74	102
1.5	126	152	57	99	102	72	98
2.0	130	154	59	98	101	70	95
3.0	135	157	62	96	99	67	89

Table 6: Estimated number of people using each part of the Leckhampton Fields per day averaged over the year.

	Date	From	To	Hrs	Dog walkers	Other users	Both	Av/hr
Mon	20-Jun-11	06:30	09:00	2.5	16	6	22	8.8
Wed	15-Jun-11	09:00	11:00	2	23	10	33	16.5
Tue	14-Jun-11	11:00	13:00	2	8	1	9	4.5
Mon	13-Jun-11	13:00	15:00	2	9	3	12	6.0
Mon	17-Jun-11	15:00	17:00	2	12	1	13	6.5
Tues	14-Jun-11	17:00	19:00	2	17	15	32	16.0
<i>Weekday (*)</i>		<i>19:00</i>	<i>21:00</i>	2			19	9.5
TOTAL .							140	
Sun	19-Jun-11	06:30	09:00	2.5	9	5	14	5.6
Sat	11-Jun-11	09:00	11:00	2	23	11	34	17
Sat	18-Jun-11	11:00	13:00	2	22	2	24	12
Sun	19-Jun-11	13:00	15:00	2	12	26	38	19
Sat	18-Jun-11	15:00	17:00	2	18	10	28	14
Sun	19-Jun-11	17:00	19:00	2	32	18	50	25
<i>Weekend (*)</i>		<i>19:00</i>	<i>21:00</i>	2			30	15
TOTAL .							225	
Average number of people using Lotts Meadow per day							162	

Table 7: Number of people observed using Lotts Meadow in survey conducted from 13 to 20 June 2011. (*) *The survey did not cover the evening period from 19:00 to dark, when in summer a lot of people walk in Lotts Meadow after dinner. The figures assumed for 19:00 to 21:00 are based on the average over the day.*

Double tick weighted by a factor of	Lotts Meadow	Church Rd / Farm Lane / Kidnappers Lane triangle	White Cross Green	Moorend Stream Path (A46 to Lotts Meadow)	Small-holding paths	Robins-wood Field and paths	Leckhampton Fields Circular Walk
Raw data	84%	100%	50%	71%	66%	48%	63%
Weight = 1	82%	100%	36%	67%	69%	50%	68%
Weight = 1.5	83%	100%	37%	65%	67%	47%	65%
Weight = 2.0	84%	100%	38%	64%	65%	46%	62%
Weight = 3.0	86%	100%	39%	61%	63%	43%	57%

Table 8: Estimated number using each area normalised as a percentage of the usage of the Central Fields (Church Rd, Farm Lane, Kidnappers Lane triangle).

Table 8 above shows the estimated usage of each part of the fields as a percentage of the usage of the central fields (the fields in the triangle bounded by Church Road, Farm Land and Kidnappers Lane). The central fields have the highest usage followed by Lotts Meadow. Surprisingly, there is little difference between the weighted data and the raw data. The exception is White Cross Green where the weighted analysis gives a significantly lower usage. This is mainly because many of the respondents who give White Cross Green two ticks are only occasional users (including walkers using the Cheltenham Circular Path).

Tables 9 to 11 show how the distance people live away from the Fields affects how often they use the Fields and for what purposes. As would be expected, those people who use the Fields 'daily or more often' live mostly within 6 minutes walk. Those people who use the Fields 'almost daily' live within about 12 minutes walk. Conversely, those who live more than 2 miles away tend to use the Fields only several times a month or less. The distance in Tables 9 to 11 is measured along the access route and the time shown is how long it takes to walk to the nearest entry point at 3 mph, which is a realistic pace on pavements. Table 11 shows the total usage for the various activities. For residents who live close to the Fields, walking considerably exceeds dog walking. About 84% of walkers are coming from within half a mile or 10 minutes walk. Dog walkers are prepared to come from further away, some coming from a mile or more. For people coming from 10 minutes away or further, dog walkers outnumber walkers.

Distance respondents live from the Fields		Number of forms from this distance	Number of households from this distance	Number of respondents at this distance	Number of respondents using Fields -						
Miles from access point	Minutes to walk there at 3 mph				Zero or not stated	Daily or more	Almost daily	Few times per week	Many times per month	Few times per month	Occasionally
0 to 0.1	0 to 2	75	67	126	4	1	30	40	22	18	11
0.1 to 0.2	2 to 4	155	141	317	4	7	105	65	63	41	32
0.2 to 0.3	3 to 6	133	126	265	5	13	80	56	57	28	26
0.3 to 0.4	6 to 8	110	106	193	5	4	52	38	35	39	20
0.4 to 0.5	8 to 10	110	108	220	0	0	34	47	52	56	31
0.5 to 0.6	10 to 12	57	55	118	5	0	42	14	23	21	13
0.6 to 0.7	12 to 14	46	45	85	0	0	11	11	18	25	20
0.7 to 0.8	14 to 16	30	30	58	0	0	6	19	11	8	14
0.8 to 1.0	16 to 20	13	12	25	1	0	0	4	0	11	14
1 to 1.5	20 to 30	19	16	37	4	0	6	4	9	7	6
1.5 to 2	30 to 40	10	9	23	2	0	0	4	0	0	17
> 2 miles	> 40 mins	23	21	44	0	0	1	4	11	10	17
All distances		781	736	1511	30	25	367	306	301	264	221

Table 9: How the frequency of using the Leckhampton Fields depends on how far away people live from the nearest access point.

Distance respondents live from the Fields		Number of response forms from this distance	Number of households forms from this distance	Number of respondents at this distance	Days per month (per respondent)					
Miles from access point	Minutes to walk there at 3 mph				Walking	Dog Walking	Running/Jogging	Playing games	With children	Relaxing
0 to 0.1	0 to 2	75	67	126	3.5	2.1	0.6	0.5	2.0	2.0
0.1 to 0.2	2 to 4	155	141	317	3.9	2.2	0.6	0.4	2.2	2.4
0.2 to 0.3	3 to 6	133	126	265	2.7	2.9	0.8	0.4	1.9	1.8
0.3 to 0.4	6 to 8	110	106	193	3.0	2.3	0.5	0.3	1.3	2.1
0.4 to 0.5	8 to 10	110	108	220	2.0	1.8	0.4	0.1	0.9	1.3
0.5 to 0.6	10 to 12	57	55	118	2.2	2.9	0.6	0.2	1.5	1.3
0.6 to 0.7	12 to 14	46	45	85	1.9	1.5	0.4	0.2	1.0	1.5
0.7 to 0.8	14 to 16	30	30	58	1.5	2.4	0.4	0.1	0.7	0.9
0.8 to 1.0	16 to 20	12	11	25	1.2	0.8	0.4	0.0	0.3	1.0
1 to 1.5	20 to 30	19	16	36	1.3	1.3	0.5	0.4	1.3	0.5
1.5 to 2	30 to 40	10	9	23	1.0	0.3	0.1	0.2	0.6	0.5
> 2 miles	> 40 mins	24	22	44	1.1	1.1	0.4	0.0	0.9	0.4

Table 10: How people use the Leckhampton Fields depending on how far away they live from the nearest access point.

Distance respondents live from the Fields		Number of households from this distance	Number of respondents from this distance	Days per month - all respondents					
Miles from access point	Minutes to walk there at 3 mph			Walking	Dog walking	Running / jogging	Playing games	With children	Relaxing
0 to 0.1	0 to 2	67	126	428	256	76	61	243	247
0.1 to 0.2	2 to 4	141	317	1207	679	177	118	694	739
0.2 to 0.3	4 to 6	126	265	706	760	210	100	494	481
0.3 to 0.4	6 to 8	106	193	586	438	94	58	255	400
0.4 to 0.5	8 to 10	108	220	447	391	98	32	196	292
0.5 to 0.6	10 to 12	55	118	257	338	68	28	176	150
0.6 to 0.7	12 to 14	45	85	160	125	32	16	83	126
0.7 to 0.8	14 to 16	30	58	88	138	24	7	40	53
0.8 to 1	16 to 20	10	20	22	16	8	0	0	21
1 to 1.5	20 to 30	17	37	48	50	19	13	48	19
1.5 to 2	30 to 40	9	23	23	6	2	4	14	11
> 2 miles	> 40 mins	22	44	48	50	16	2	40	19
All distances		736	1506	4021	3247	825	439	2282	2558

Table 11: How the total usage by all respondents depends on distance from the Fields

Table 12 below shows that people use the Leckhampton Fields from all directions. The main routes and access points to the Fields are:

- A From West via A46, Brizen Farm footpath, Lanes Estate, Farm Lane
- B From West / Northwest via A46 and the smallholding access track from A46
- C From North / Northwest via A46 and the Moorend Stream footpath
- D From North / Northeast via roads to Merlin Way or via Burrows Field
- E From East via Church Road and allotment footpath to Lotts Meadow or Cheltenham Circular Path to the central fields
- F From South via Kidnappers Lane and Leckhampton Fields Circular Walk
- G From South / Southwest via Farm Lane and Cheltenham Circular Path

The total from the North/NW (column C) is artificially low because, as noted earlier, a shortage of leaflets meant that a number of roads in this direction were not covered in the consultation. The totals in columns F and G are low because there are few houses in the AONB to the south. There are relatively few responses from further away than 0.7 miles because consultation leaflets were not delivered beyond this range.

Distance respondents live from an access point to the Leckhampton Field		Number of households from this distance	Number of respondents at this distance	A	B	C	D	E	F	G
Miles from access point	Minutes to walk there at 3 mph			WEST	WEST / NW	NORTH / NW	NORTH / NE	EAST / SE	SOUTH	SOUTH / SW
0 to 0.1	0 to 2	67	126	32	1	3	24	0	4	3
0.1 to 0.2	2 to 4	141	317	59	1	16	21	17	18	9
0.2 to 0.3	4 to 6	126	265	6	20	0	29	59	5	7
0.3 to 0.4	6 to 8	106	193	4	10	16	57	18	0	1
0.4 to 0.5	8 to 10	108	220	16	23	10	41	18	0	0
0.5 to 0.6	10 to 12	55	118	0	15	0	18	22	0	0
0.6 to 0.7	12 to 14	45	85	0	9	0	17	19	0	0
0.7 to 0.8	14 to 16	30	58	0	7	1	0	22	0	0
0.8 to 1	16 to 20	10	25	3	4	0	1	3	0	0
1 to 1.5	20 to 30	17	36	10	0	1	1	4	0	0
1.5 to 2	30 to 40	9	23	1	2	2	1	3	0	0
TOTAL (< 2 miles)		714	1466	131	92	49	210	185	27	20
> 2 miles	> 40 mins	22	44							

Table 12: Access routes to the Leckhampton Fields and number of respondents using each route.

In multiple choice question 4, the consultation asked people to say what features of the Leckhampton Fields they particularly value. Table 13 below summarises the responses. Double ticks have been given a weighting of 2 and single ticks a weighting of 1. The column marked 'Raw data' treats all respondents as equal and takes no account of how much they use the Field

or of their household size. The columns marked 'Weighted' are for the weighing factors in Table 3. The score for each aspect is shown normalised against the weighted score for 'Views of Leckhampton', which is the feature that people value most. The figures in the right hand column show how features are ordered in terms of how much they are valued. The table also gives an analysis depending on how far respondents live away from the Leckhampton Fields.

	Weighted		Raw data		Depending on how far away people live (weighted)							
	All		All		0-0.2		0.2-0.4		0.4-0.7		>0.7	
<i>Distance from Fields (miles)</i>												
Views of Leckhampton Hill	100%	1	106%	1	103%	1	103%	1	95%	1	75%	4
Rural atmosphere	95%	2	98%	3	92%	3	100%	2	91%	3	84%	2
Views across the fields	92%	3	98%	4	96%	2	91%	3	91%	2	74%	6
Network of footpaths	87%	4	87%	5	86%	4	90%	4	84%	6	85%	1
Tranquillity	82%	5	85%	6	83%	5	76%	7	86%	5	80%	3
Trees	78%	6	78%	7	74%	7	81%	5	79%	7	71%	8
Opportunity for exercise	74%	7	100%	2	77%	6	80%	6	87%	4	61%	12
Hedgerows	70%	8	71%	9	65%	11	73%	8	70%	9	71%	7
Birds	69%	9	72%	8	72%	9	68%	10	66%	11	67%	10
Wild animals	68%	10	61%	12	72%	10	66%	11	66%	10	53%	17
Wildflowers	65%	11	65%	10	61%	12	63%	13	70%	8	74%	5
Streams	65%	12	58%	13	59%	13	72%	9	63%	12	59%	13
Farm Animals	61%	13	61%	11	74%	8	53%	15	58%	14	49%	19
Wilderness areas	60%	14	54%	15	53%	15	63%	12	62%	13	67%	11
Circular walks	55%	15	55%	14	58%	14	53%	14	49%	16	69%	9
Orchard	44%	16	40%	16	42%	18	38%	20	50%	15	55%	16
Horses	42%	17	37%	19	45%	16	38%	21	43%	18	44%	21
Variety	42%	18	40%	17	45%	17	38%	19	40%	19	57%	14
Medieval cottages	42%	19	40%	18	38%	21	48%	16	38%	20	43%	23
Ponds	41%	20	36%	20	39%	20	46%	17	37%	21	46%	20
Smallholdings	39%	21	36%	21	41%	19	28%	22	45%	17	55%	15
Medieval moat	38%	22	34%	22	36%	22	40%	18	36%	22	44%	22
Old nurseries	27%	23	23%	23	25%	23	25%	23	29%	23	51%	18

Table 13: How much people value various features of the Leckhampton Fields based on the answers given to question 4. The scores are normalised as a percentage against the score for 'Views of Leckhampton Hill', the feature that people valued most highly.

As can be seen, when one combines the data from all respondents there is little difference between the raw data and the weighted data except in the one case of 'opportunity for exercise' which is significantly lower in the weighted analysis. How far people live away from the Fields makes little difference to what features they most value, except perhaps in the case of respondents who live more than 0.7 miles away. Table 14 shows the raw responses to question 4 grouped by how people access the Fields from their homes. Again, there is little or no significant difference between each group.

For all groups, what people value most are the views of Leckhampton Hill, the rural atmosphere, the views across the fields, the network of footpaths, the tranquillity, the opportunity for exercise, the trees, hedgerows and nature. In view of the proposal in the revised LGS to exclude the old nurseries and most of the northern smallholdings, it is significant that in all groups the old nurseries are valued by the least number of people. The smallholdings are also fairly low on the

list although more highly valued by respondents living more than 0.5 miles away. Wilderness areas, however, are more strongly rated. The main wilderness areas are the southern smallholdings, the thin strip between hedgerows east of Robinswood Field, and the three disused orchards north of Kidnappers Lane, south of Robinswood Field and east of Farm Lane. These areas are included in the proposed LGS except the orchards south of Robinswood Field and north of Kidnappers Lane. The Farm Animals are particularly valued by people living within 0.2 miles of the Fields. This may be because people see them frequently and may take their children to feed them in the case of the pig fields.

	From A46 via Brizen footpath or Kidnappers Lane	From A46 via Smallholding Path	From A46 via Moorend Stream Path	From north via Merlin Way or Burrows Field	Via Church Road via 3 routes	From Kidnappers Lane via 4 routes	Via Farm Lane (3 routes)	From Lanes Estate	From outside the local area
Views of Leckhampton Hill	1.14	1.38	1.23	1.16	1.17	1.29	1.45	1.30	1.02
Rural atmosphere	1.01	1.30	1.16	1.10	1.09	1.19	1.30	1.13	0.89
Views across the fields	0.94	1.25	1.15	1.00	1.15	1.13	1.43	1.22	0.80
Network of footpaths	0.95	1.14	1.02	0.93	0.97	1.02	1.03	1.09	0.89
Tranquillity	0.89	1.19	1.05	0.89	0.97	1.04	0.95	1.02	0.80
Trees	0.82	1.08	0.87	0.82	0.89	0.69	0.95	1.01	0.73
Opportunity for exercise	1.18	1.35	1.03	1.08	1.09	1.25	1.40	1.22	0.91
Hedgerows	0.86	0.91	0.71	0.83	0.79	0.77	0.88	0.84	0.66
Birds	0.82	1.01	0.80	0.82	0.74	0.87	0.80	0.81	0.86
Wild animals	0.83	0.88	0.65	0.67	0.60	0.79	0.85	0.73	0.55
Wildflowers	0.69	0.93	0.67	0.71	0.74	0.81	0.55	0.74	0.73
Streams	0.64	0.81	0.66	0.60	0.71	0.65	0.63	0.59	0.64
Farm Animals	0.64	0.83	0.58	0.69	0.67	0.60	0.65	0.84	0.55
Wilderness areas	0.76	0.85	0.59	0.56	0.59	0.60	0.60	0.59	0.57
Circular walks	0.85	0.80	0.48	0.57	0.54	0.83	0.58	0.75	0.45
Orchards	0.45	0.57	0.38	0.39	0.52	0.46	0.48	0.46	0.50
Horses	0.33	0.51	0.26	0.38	0.46	0.48	0.55	0.43	0.30
Variety	0.46	0.55	0.43	0.47	0.43	0.44	0.30	0.47	0.45
Medieval cottages	0.43	0.67	0.39	0.42	0.45	0.52	0.40	0.46	0.36
Ponds	0.45	0.67	0.27	0.35	0.38	0.52	0.45	0.38	0.34
Smallholdings	0.39	0.42	0.26	0.39	0.49	0.37	0.35	0.37	0.43
Medieval moat	0.44	0.49	0.40	0.38	0.39	0.42	0.30	0.32	0.34
Old nurseries	0.29	0.35	0.13	0.31	0.22	0.31	0.15	0.27	0.27
Total	16.25	19.94	15.15	15.53	16.07	17.04	17.00	17.03	14.02

Table 14: How the raw responses to question 4 vary depending on where respondents live and their nearest access to the Leckhampton Fields. The number in each box is the average number of ticks per respondent.

Question 4 also asked respondents to identify any other features of the Fields that they particularly value. All of the responses overlapped responses to question 5 and have been included in section 5 below.

5. Importance of Leckhampton Fields to local people

Question 5 asked people to say how important the Leckhampton Fields are to them and why. Many respondents explained why the Leckhampton Fields are important, but without explicitly saying how important or how highly valued the fields were. Only on 56% of the forms (57% of responders) did respondents give a direct answer on how important the Leckhampton Fields were to them. The 56% were scored 'unimportant' = 0, 'somewhat/fairly important' = 1, 'important/quite important' = 2, and 'very/extremely important' =3 (or equivalent wording). Overall this gave an average score of 2.84. So, most of the 56% that answered the first part of question 5 considered the Fields were very important or extremely important to them. Only one form (two respondents) said that the Fields were unimportant. These two respondents did not use the Fields and felt the priority to build more housing should override landscape or amenity considerations.

Respondents gave a very large number of reasons why the Fields are important to them. However, many of the reasons were broadly similar and the responses have been amalgamated into 96 summaries below. The number of respondents whose comments have been amalgamated into each summary is shown in brackets.

1. **Access - easy and quick (317 respondents)** It is very important having this quick easy every day access to open green space, fresh air away from traffic, and beautiful peaceful countryside; so very convenient for recreation, dog walking, exercise, relaxation, family life and just walking around after a day in the office. It is not just that the Fields are close; they are also always rewarding because of the diversity of scenery and views changing with the seasons, time of day, weather, clouds, and because of the wildlife one may see; also the rich network of paths gives many different routes to follow. All of these features make the area so special and rewarding for everyday activity and relaxation. The benefit of the Leckhampton Fields as a place for relaxation and reflection was cited by 104 respondents and 176 respondents said the Leckhampton Fields were the prime or a prime reason that they had chosen to live in the area; some said they would move elsewhere if there was major development.
2. **Access - fresh air (62 respondents)** The Leckhampton Fields are the "lungs of south Cheltenham" enabling residents to take in the fresh air, giving vital breathing space away from the traffic and pollution, and used by people from all directions across Cheltenham, not just by locals.
3. **Access - passers by (10 respondents)** The Fields afford daily pleasure to commuters and other passers-by who drive or cycle through the area and enjoy the scenery, views and rural atmosphere.
4. **Access - so many users (19 respondents)** The Leckhampton Fields are used by so many people and families, and they are a great place to take visitors
5. **Access - without a car (116 respondents)** It is a huge advantage to be able to take a walk, walk the dog, enjoy activities with children all without having to use a car (and adding to traffic, CO2 and pollution). The Fields are ideal when you do not have the energy, or time, or fitness to climb up Leckhampton Hill, or if you live too far away from the Hill to get there without using a car. The footpaths also provide a rural route on foot to the Hill and for longer walks in the Cotswolds, again without using a car.

6. **Access - from west of the A46 (18 respondents)** For residents living west of the A46 in Warden Hill, Hatherley and The Park, the Leckhampton Fields provide green space accessible on foot and direct access to the AONB and to Leckhampton Hill for longer walks. One respondent comments that from Hatherley Road the Leckhampton Fields are the closest and most convenient facility for jogging and as an amenity for a young family. Another respondent from the Park area says that 'the Leckhampton Fields are the main local green space where we can walk, run and walk our dog without using a car. The fields allow me to get into a green space within 15 minute walk of my home.'
7. **Access - from other parts of Cheltenham (26 respondents)** Although the public consultation has been confined to the immediate locality, the Leckhampton Fields are also used by people from all over Cheltenham, notably Charlton Kings, Up Hatherley, west Cheltenham, Benhall, especially when they have friends or relatives in Leckhampton. The Fields are a big part of what makes Cheltenham a much loved town. One respondent says 'I live in Charlton King, but for me Lotts Meadow is possibly the most beautiful location of its kind that I have ever come across'.
8. **Agriculture - allotments (9 respondents)** The Fields are good agricultural land, much of it grade 2. There is a big demand for allotments in Cheltenham for food and recreation. We need to preserve the smallholdings and provide more allotments.
9. **Agriculture - farm animals (36 respondents)** People love the pigs, sheep, hens, geese, ducks in the smallholdings, and walking through the cows and sheep in the fields. Chatting to the smallholders about what they are growing is great too. Many people love getting close to the sheep and lambs on White Cross Green; also feeding the pigs and watching the piglets at the pig field on the A46 and the pig field in Farm Lane.
10. **Agriculture - grazing animals (24 respondents)** People love the sight and sounds of animals grazing in the fields – the cows, sheep and horses. One respondent says 'I have had ponies in this area for 35 years'.
11. **Agriculture - nurseries and smallholdings (15 respondents)** Much of the land is grade 2 and its agricultural and horticultural value should not be ignored. It was the loss of local access to market when the Cheltenham town market closed that made the Leckhampton nurseries commercially unviable. This could be reversed in the future with greater demand for local unpackaged produce.
12. **Amenity for all (86 respondents)** The Leckhampton Fields provide a wonderful and diverse amenity for year-round outdoor activities in real countryside, safe and unhindered by cars and traffic. They are used for walking, dog walking, cycling, nature rambles, running, geocaching, den-building, astronomy, orienteering, outdoor challenge, and games with children. Everyone, no matter what their income or age, can find relaxation, rest, exercise and wellbeing in this environment. One respondent comments 'The fields and footpaths provide a constant daily source of enjoyment; I never tire of them'.
13. **Amenity for all weathers (51 respondents)** The fields and footpaths provide nice gentle walks that are delightful and accessible; the many footpaths and routes give great variety and mean one can avoid any muddy areas in wet weather.
14. **Amenity for exercise (17 respondents)** The footpaths and fields are a great place to exercise whilst enjoying the natural environment. They are excellent for running in and many people use them. Two respondents comment that 'Walking and running in the area is our main leisure activity'.
15. **Amenity for less mobile residents (9 respondents)** When you are too old to do many long walks or if you are disabled, the views, footpaths and countryside of the Leckhampton Fields become even more important.

16. **Amenity for South Cheltenham (45 respondents)** South Cheltenham has become very built up. The Leckhampton Fields are the only sizeable green space left in this area for walking, dog walking and viewing wildlife. In the interests of sustaining a reasonable quality of life and environment for current and future generations in South Cheltenham, the Leckhampton Fields need to be conserved and integrated into the future plans for the area. The Fields are extremely important to the communities on all sides.
17. **AONB - avoiding urban sprawl (18 respondents)** The Fields are important for keeping urban sprawl sufficiently away from the AONB.
18. **AONB - looking over the Fields (2 respondents)** We walk mainly in the AONB but the Leckhampton Field are still vital to us because of the fine views across the Fields from the AONB. They are so unique.
19. **AONB - rural charm (5 respondents)** The special rural environment and charm of the Fields complements the AONB and Leckhampton Hill to the south, and expands the beauty of the area.
20. **Art - drawing, painting, photography (10 respondents)** The Fields are used by many people for drawing, painting and photographing the scenery and wildlife.
21. **Beauty of the landscape (75 respondents)** This is a very beautiful landscape with peace and tranquillity, great variety and interest, beautiful old cottages and trees. It is lovely to be in, unspoilt, refreshing, invigorates the soul, treasured by local people. It is a rural gem and should have been incorporated into the AONB. Its special beauty could easily be lost.
22. **Character and diversity (18 respondents)** The fields give the distinct character to the area providing incredible diversity within what it a relatively small space; they are beautiful and energising.
23. **Importance to Cheltenham (15 respondents)** The fields are very important to the character and image of Cheltenham. They are part of what makes Cheltenham a 'countryside town' so perfect for people of all ages. Without them, south Cheltenham just becomes urban sprawl.
24. **Circular Walk and Circular Footpath (7 respondents)** The Leckhampton Field Circular Walk provides a substantial local walk that gains the full value of the area and its variety. The Leckhampton Fields are also one of the finest sections of the Cheltenham Circular Footpath. Both the Leckhampton Fields Circular Walk and the Cheltenham Circular Footpath in this area must be properly preserved.
25. **City farm (14 respondents)** Until recently, when the animal smallholdings were fully operating, they were like an 'urban farm' and such a lovely amenity. It was great to see people keeping livestock on a small scale. The delightful mix of animal and vegetable husbandry could easily be restored and enlarged by bringing back smallholders and offering them proper leases long enough to make investment worthwhile.
26. **Cycling (13 respondents)** For cyclists the quiet rural nature of this area gives a safe and enjoyable place for a local ride and useful roads to move around this side of town. Cycling on the Leckhampton Fields is much safer for children than being on the roads.
27. **Dog walking - freedom (10 respondents)** Dogs can run free over the fields (Lotts Meadow and Robinswood Field).
28. **Dog walking - meeting others (23 respondents)** The Leckhampton Fields are a lovely area for dog walking and for enjoying the beauty and socialising with the many other dog walkers.
29. **Dog walking - Northern Fields / Robinswood (5 respondents)** The Northern Field footpaths, Robinswood Field and Moorend Stream path are very important for dog walking,

especially for residents living to the west and also when other locations are muddy or waterlogged.

30. **Dog walking - variety of routes (13 respondents)** The rich network of footpaths gives a good variety of different routes for walking and dog walking every day and for avoiding any muddy or waterlogged areas in wet weather. Particularly valuable for dog walking in winter when Lotts Meadow and other locations are quite wet.
31. **Family activities (49 respondents)** The Fields provide high quality family time and wellbeing. They allow families to spend time together, exercising, exploring wildlife, climbing trees, having picnics, picking blackberries and enjoying the fresh air.
32. **Family, friends and relatives (5 respondents)** We frequently use the area for rambling when our relatives and friends visit us
33. **Flood prevention (17 respondents)** The Leckhampton Fields are important in holding flood water and protecting south Cheltenham.
34. **Footpaths (11 respondents)** The paths with their open views across the fields are a real pleasure to walk; no traffic rushing by. The views are priceless and should not be lost.
35. **Footpath network (34 respondents)** The network of footpaths provides lovely routes in all directions. Most paths are reasonably firm under foot even in very wet weather. As well as the diversity of walks, the footpaths also provide countryside routes to get to shops in the Bath Road and Salisbury Avenue, the supermarket, schools, doctors, from Warden Hill to Leckhampton, to the AONB and Leckhampton Hill, to the allotments by Burrows Field and to and from Crippetts Lane and the Lanes Estate. Many people enjoy using these lovely routes rather than driving.
36. **Future generation (114 respondents)** The Leckhampton Fields are a very important amenity for the future. We must revere and protect this very special area for future generations, including for children who need areas to play in. The fields are fundamental to current and future residents of Leckhampton, very important to their health and fitness, and also hugely important to maintaining Leckhampton's rural village atmosphere.
37. **Health - antidote to stress (41 respondents)** The Leckhampton Fields give a sense of freedom; they are a place to unwind, a great antidote to the stress and bustle of this busy world, very beneficial if one has a stressful life or job.
38. **Health - medical importance (32 respondents)** Medical evidence is demonstrating how important exercise, walking and relaxation are to physical and mental health. The government increasingly appreciates the big economic and social benefits from improving physical and mental health and reducing obesity. The value of the Leckhampton Fields as a natural rural environment for exercise and recreation will be appreciated more and more, and we need to make the Fields even more easily available year round and encourage even more use of them by local people. Sports England's most recent campaign has highlighted the ever-increasing need for women in particular to exercise in these times of increasing obesity - don't take these fields away from hardworking young people.
39. **Health - psychological and mental (69 respondents)** Being in this countryside and close to nature gives great psychological benefit and sense of wellbeing, physical and spiritual release, and energy. It gives perspective on problems, enables you to see the larger picture, helps better mental balance and health. One respondent says that she came to this area suffering from depression and on medication, and she believes that it has been the combination of Leckhampton Fields and Leckhampton Hill that have 'cured' her of the depression and enabled her to live a full life without medication.
40. **Health - healthy living (119 respondents)** The Leckhampton Fields are a key part of healthy living and wellbeing for very many local people and families (and for dogs also). They

are suitable for all ages and enable older residents to exercise. They help combat sedentary lifestyle, stress, obesity and loneliness.

41. **Health - therapeutic exercise (15 respondents)** The Leckhampton Fields are vital for people who are required to take regular walks for medical reasons. One respondent says 'For people like me with heart disease and/or COPD, the Fields are life-saving for daily exercise and air quality'. The fresh air also helps alleviate asthma.
42. **History - old Leckhampton (42 respondents)** The Fields give a great sense of history, links with the past, feeling of place and belonging as you walk round the area. The land is still much as it has been used for centuries. It is important to conserve this and for current and future generations to have a sense of history in their locality. The moat and Medieval cottages, Leckhampton Manor and St. Peter's Church, the pre-enclosure fields and hedgerows, are a very important part of Leckhampton history. Part of what appears to be an ancient hollow way crosses the field north of Moat Cottage behind the other two cottages.
43. **History - old rural environment (16 respondents)** The Leckhampton Fields are a highly important old rural environment that needs to be preserved for all the reasons cited in question 4 and because it is so heavily used. It is important to preserve the ancient hedgerows, trees, orchards and wildlife and the variety of agricultural use that gives the Fields such character, beauty and links with the past.
44. **Housing - need for housing (5 respondents)** The drive to build so many new homes is not a proper reason to sacrifice the tremendous community value of the Leckhampton Fields. It would be even more tragic if the Fields are sacrificed because the housing need has been over-estimated.
45. **Housing - priority for more housing (2 respondents)** We ourselves have never used the Leckhampton Fields and we believe that protecting them is unimportant compared with the requirement for more housing in Cheltenham.
46. **Housing - pressure to fill in (5 respondents)** The Leckhampton Fields are very valuable to local people as an amenity enclosed in and easily accessible from populated areas, but this close proximity is not a valid reason to turn this amenity into an urban extension.
47. **Housing - protecting views (10 respondents)** From the footpaths and fields there are amazing views of Leckhampton Hill; we need to ensure any development does not obstruct them.
48. **Leckhampton character and quality of life (66 respondents)** The Fields are crucial to the character of Leckhampton, its identity, its quality of life and its community.
49. **Leckhampton Court Hospice (2 respondents)** The Sue Ryder Hospice visitors and care staff find respite from the beautiful scenery of the Hill.
50. **Lived here for many years (135 respondents)** I/we grew up here and/or have lived here for decades.
51. **Lived here for many years (63 respondents)** Our children grew up here and love this area / our grandchildren love it
52. **Local Green Space (13 respondents)** Strongly support the creation of the LGS and the need to stop the continual erosion and despoiling of this beautiful area.
53. **Local Green Space (12 respondents)** LGS designation should enable the use and value of the fields and footpaths to be enhanced; perhaps there could be a managed wildflower meadow, some cycle tracks and better access to the viewpoints for disabled and infirm.
54. **LGS boundary (4 respondents)** All of the area proposed for the LGS is really important for local people, their leisure, and their physical and mental wellbeing.

55. **LGS boundary - smallholdings (42 respondents)** The smallholdings are a lovely part that should be preserved and restored. They are part of the Church's Glebe Land. We need to preserve this and not accept that urbanisation is inevitable. We love the atmosphere of the smallholdings, talking to the owners, and seeing the seasons come and go.
56. **LGS boundary - Northern Fields (47 respondents)** The Northern Fields and smallholdings are very precious to many nearby residents in Warden Hill and together with Robinswood Field they are the only local space residents have. They are vital for recreation and as an escape from the A46 traffic noise and pollution. They should have been kept in the LGS as in the original 2013 submission and not removed. The Northern Fields also provide a stunning country view across to Leckhampton Hill from the A46 at what is the main 'gateway' to Cheltenham from the south. The view across the 'pig field' is especially cherished by motorists and local people. These views and the countryside aspect give a good first impression of Cheltenham as a beautiful town.
57. **LGS boundary - Moorend Stream (1 respondent)** The LGS needs to preserve a wider green buffer zone along the north end of the Moorend Stream footpath
58. **LGS boundary - stick to original boundary (32 respondents)** The LGS as proposed in 2013 was right; it should not have been reduced. There should be no major development south/east of the A46 or on White Cross Green. Taking out the smallholdings and nurseries is a missed opportunity to apply vision to local resources and economy. It would be better if the nurseries and orchards along Kidnappers Lane were used for allotments rather than being built on. It is also folly to believe that the development on the areas not included in the LGS will not make a huge impact upon the adjacent areas.
59. **LGS boundary - White Cross Green (58 respondents)** There needs to be more open green space at the north end of White Cross Green than is currently proposed in the LGS application. I/we suggest that, if necessary, the buffer zone along Leckhampton Lane might be reduced to help allow for more LGS at the north side. The LGS at the north end needs to provide sufficient amenity space and children's play area for residents in the Lanes Estate and also sufficient space for the Cheltenham Circular Path and for seeing the particularly fine views of Leckhampton Hill from the path.
60. **LGS boundary - White Cross Green (30 respondents)** The LGS area proposed on White Cross Green is too small. There needs to be a wider/larger green strip / park area at the north side of White Cross Green to provide an amenity space and children's play area, for the Cheltenham Circular Path and for wildlife/habitat.
61. **Place for relaxation and reflection (104 respondents)** Relaxing and walking on the Leckhampton Fields are a central part of my/our life and the life of many local families. The Fields provide a calming atmosphere, a haven of peace and tranquillity, a place to really relax in an increasingly frenetic world, to be close to nature, away from traffic, to enjoy solitude and reflection, to contemplate, pray, meditate, practice mindfulness. They provide room to think and recharge.
62. **Place of tranquillity (54 respondents)** Greatly value the rural tranquillity / slower pace and escape from hectic modern life / relaxing after work. Walking on the fields and footpaths is a great source of enjoyment and inspiration.
63. **Rarity of this rural landscape (9 respondents)** This type of largely unspoiled old rural landscape is increasingly rare and needs protecting, particularly when in the case of the Leckhampton Fields it has such high community value and is so well used.
64. **Reason for living here (176 respondents)** Why we came to live here / Primary reason for living here / The fields make this a very special place to live for us and many other people / We would look to move away / be impelled to move away from the area if development took over the Leckhampton Fields.

65. **Safety (45 respondents)** These fields and footpaths are a very safe/secure area, including for jogging, walking and dog walking, and for children to play.
66. **Social and community benefits (67 respondents)** The Fields provide a great social environment for walking with and meeting friends and new people; important in fostering an active and harmonious community, and preventing loneliness and isolation. One can meet dozens of people every day jogging, exercising and just walking their dogs. It is easy to say hello and chat with people. Also uplifting is the obvious joy the area brings to people you meet of all ages. It is a pleasure just watching people enjoying themselves in the fresh air.
67. **Housing - social housing (1 respondent)** We need more social and affordable housing, but we won't get much here because property prices are so high. It is more important to maintain the quality of environment for the existing estates in south Cheltenham.
68. **Tourism and economic value (6 respondents)** Nature and open space has economic value; important for tourism
69. **Traffic, pollution and schooling (137 respondents)** The serious problem of traffic congestion and pollution would be of grave concern if there were development on the areas not included in the LGS; likewise the problems of the shortage of available schooling and potential flooding of Warden Hill.
70. **Urban countryside - delights (31 respondents)** Love the uncongested openness, the lovely views through the changing seasons, and being so easily in beautiful countryside. The views of Leckhampton Hill are stunning.
71. **Urban countryside - fruits of nature (58 respondents)** In season I/we regularly gather produce - blackberries, sloes, damsons, elderflower, greenery, manure.
72. **Urban countryside - open areas (88 respondents)** Very important having open recreational land and real countryside close by the residential areas. A great benefit to Cheltenham.
73. **Urban countryside - real countryside matters (63 respondents)** Real countryside with nature, heritage, farming is different from parks, sports grounds and play-areas; people need both and it is so valuable having within the town this rural area that is unspoilt and so full of interest. The Fields are easily accessible to many thousands of households on all sides and large enough to feel one is in countryside.
74. **Urban countryside - really special area (39 respondents)** Having such fine rural landscape with its tranquillity and rich footpath network inside a town is something very special and rare and what the LGS legislation is there to protect and encourage.
75. **Urban countryside - sanctuary (76 respondents)** The Leckhampton Fields provide fresh air and escape from busy roads, urban rush, noise, exhaust-pollution, pressures of modern life.
76. **Urban/rural balance (2 respondents)** Having lived in Cheltenham for the past 11 years after growing up in a Cotswold village, Leckhampton is the first area where I have truly felt at home - a perfect compromise between town and country.
77. **Urban/rural living (84 respondents)** Greatly value having the benefits of both country living and urban living, both within walking distance, being so close to work and to countryside.
78. **Value for children - many things to do (128 respondents)** Wonderful place for children - so many things they can do on the fields and for exercise. Children love this area and its rural environment - the freedom, family walks, flying kites, exploring, looking at nature, spotting and watching animals, playing in fields, cycling through the fields, building dens, climbing trees, fascinated by the water and streams.

79. **Value for children - seeing nature (100 respondents)** So important to have clean green space for children to play and appreciate nature. Excellent for teaching children about nature and farming and letting them observe it at first hand, showing them wildlife, gathering specimens for wildlife classes at school, encouraging them to ask questions and to appreciate and value beauty
80. **Value for office workers (2 respondents)** If you are working in an office and living on a tight budget, the Leckhampton Fields for dog walking, exercise and fresh air are a life saver.
81. **Value for older residents - being safe (24 respondents)** The Fields give older and less mobile residents safe and effective access to beautiful countryside, walking and exercise.
82. **Value for older residents - keeping fit (1 respondent)** As an elderly resident it is vital to have green spaces close at hand to walk in safely and thus help to keep healthy and not a burden on the community.
83. **Value for older residents - getting out (1 respondent)** This is the only outing and exercise I get now that I am in my nineties. I rely on my daughter taking me out when she walks her dog in the fields and nearby.
84. **Value for youth activities (2 respondents)** The Leckhampton Fields provide the open space for regular outdoor activities of Bethesda Scout Group (Great Norwood Street). The Group has over 100 young people. The meeting place has no land for outdoor activities. Leckhampton Fields are in walking distance and used by the Group all the year round. Activities include hiking (at night also), orienteering, nature, games, astronomy, outdoor challenges etc.
85. **Value of the level ground and footpath network (51 respondents)** The flatness of the fields and network of footpaths are good for children and elderly; not everyone can walk up the steep slope of Leckhampton Hill or risk the often rough and slippery paths. Older people can still walk in the Leckhampton Fields into their nineties. The flatness is also good for children who are disabled or with special/additional needs, and there is good access for disabled users.
86. **Value of wildlife and farm animals (44 respondents)** I love walking with children/grandchildren to see and feed farm animals and see wildlife
87. **Valuing open spaces for the future (14 respondents)** It is one of Britain's great triumphs that we have valued and protected our open spaces and finest views for future generations despite being such a crowded island. We all need to keep doing this.
88. **Views over the fields (26 respondents)** A big part of the charm of the Leckhampton Fields is the multitude of lovely views in all directions across the fields, from one field to another. These include many fine views with Leckhampton Hill in the background. White Cross Green not only has beautiful views of Leckhampton Hill but also, from its high point, gives panoramic views across the Severn Valley to the Forest of Dean, May Hill, the Malvern Hills, Tewkesbury Abbey and as far as the Droitwich radio masts. People, whether local or passers-by, much enjoy looking at the Leckhampton Fields from the roads and from Leckhampton Hill.
89. **Village atmosphere (13 respondents)** The Fields keep Leckhampton as a village rather than just an extension of urban Cheltenham.
90. **Warden Hill - quality of life (18 respondents)** The Leckhampton Fields add greatly to the desirability of living in Warden Hill, enabling us to get away from streets and traffic and enjoy countryside and the tranquil peacefulness abounding with wildlife and birds.
91. **Wildlife - at close range (108 respondents)** Greatly enjoy seeing and hearing wildlife at close range, birdwatching, watching the great variety of wildlife

92. **Wildlife - diversity (62 respondents)** Love the diversity of landscape, trees, wild flowers, vegetation, many species of small birds, woodpeckers, owls, buzzards, bats, deer, foxes, badgers, hedgehogs, and other wildlife. Beautiful seeing the deer in mornings and evenings. There are also the winter visitors including redwings and fieldfare.
93. **Wildlife - in urban area (33 respondents)** Provides space for nature in the urban area; keeps us in touch with wildlife and wild places; we need to protect our ecosystems
94. **Wildlife - preservation (51 respondents)** Important for preserving wildlife and species in the area including the great crested and other newts, butterflies, bats, grass snakes, slow worms, water voles, stoats, owls and cuckoos.
95. **Wildlife - rich haven (37 respondents)** Haven for wildlife / richness of wildlife / great diversity of wildlife in the ancient hedgerows
96. **Work activity on the Fields (9 respondents)** Working on the smallholdings, tending to livestock, planting and looking after trees, maintaining the footpaths, walking clients for therapy

What is valued by the largest number of people is having easy and quick access to open green space for recreation, dog walking and exercise and also the way the variety of scenery and changing character over the seasons makes the Leckhampton Fields constantly rewarding every day. This statement is made in one form or other by a total of 317 respondents (21%). Allied to this, another feature people value highly is the ability to access the fields without having to use a car (116 respondents).

Several hundred respondents cite the great value of 'urban countryside': having countryside right on one's doorstep and at the same time also having the amenities of the town. In a range of statements, several hundred respondents say how much they love the wildlife and animals on the Fields.

Around two hundred respondents cite the value of the Leckhampton Fields for children, both for the variety of activities and also for exploring and appreciating nature. The safety of the area for young and old is also appreciated and the social atmosphere and the way people talk to others, meet people and made friends through walking and dog walking.

Over 150 respondents say that they and/or their family have been living in the Leckhampton area for many decades and 176 respondents say that the Leckhampton Field are the reason or a major reason that they live here. The importance of preserving the Fields as an amenity for current and future generations is raised by 114 respondents.

The value of the Fields for healthy living is raised by 119 respondents and there are many other comments on the value for physical and mental health for various age groups. Over 50 respondents make the point that the flatness of the fields and the network of footpaths are good for children and elderly, noting that not everyone can walk up the steep slopes of Leckhampton Hill or risk the often rough and slippery paths on the Hill. It is commented that older residents still walk in the Leckhampton Fields into their nineties. It is also pointed out that the flatness is good for children who are disabled or with special/additional needs, and there is good access for disabled users.

The consultation questionnaire specifically asked people to give their views on the updated local green space and whether there they felt any other area that is currently included could be left out. Apart from the one form mentioned earlier, no respondents have suggested reducing the

area of the LGS further or taking any particular area out of the LGS. There are over 200 comments about areas that respondents feel should not have been removed.

Many respondents objected to the amount of land on White Cross Green that had been taken out of the proposed LGS in response to the pressure from the JCS and TBC: 88 respondents argued that there was too little amenity land protected on the northern side of White Cross Green for local residents and many respondents also emphasised how beautiful the view of Leckhampton Hill is from White Cross Green and the importance of protecting the view from the Cheltenham Circular Path as much as possible. Some of the respondents were walkers living elsewhere in the area and who use the Cheltenham Circular Path as mentioned earlier.

As for the part of the proposed LGS in Cheltenham Borough, 32 respondents said that the Parish Council was wrong in reducing the LGS from what was proposed in 2013, and a further 83 respondents emphasised the importance of preserving the Northern Fields and smallholdings, if at all possible. Cheltenham's MP, Martin Horwood, was one of the respondents who argued most strongly that the Parish Council should seriously consider putting all or part of the Northern Fields and smallholdings back into the LGS.

Concerning the proposed removal of the orchards and nurseries in Kidnappers Lane from the LGS, there were a few comments from respondents that it would be better to use the area for orchards and allotments or to revive it for food production rather than to build on it. There were many more comments under question 7 (discussed later) about the impact of allowing development so close to Leckhampton Hill and the need to make absolutely sure that any development is very well screened and very sympathetic.

Although more germane to the neighbourhood plan than to the LGS, concerns were raised by 137 respondents over how any development on the land not included in the LGS would affect the already very serious traffic congestion and pollution. Concerns were also expressed over the problems of the shortage of available schooling and potential flooding of housing in Warden Hill and along the Hatherley Brook tributaries.

6. Importance of the views from Leckhampton Hill

In question 6, respondents were asked to say how important the views from Leckhampton Fields are to them and how important to Cheltenham. As with question 5, many respondents explained why the views are important without explicitly saying how important they considered they were. Two thirds of the forms (62% of respondents), however, did say explicitly how important the views were. The majority of them considered that the views were very or extremely important and using the same scoring scheme as for question 5, the average score was 2.82 out of 3.

The various points made in answer to question 6 have been amalgamated into 29 summaries below.

1. **Beauty in all seasons (5 respondents)** We have walked on the Hill for decades and have wonderful memories of the views in different seasons and conditions.
2. **Cheltenham's iconic views (135 respondents)** The iconic views from Leckhampton Hill are priceless and very important to Cheltenham's beauty, fame, economy, residents and visitors. The Hill and its views are a big part of what makes Cheltenham a lovely place to live and makes people proud to live here.

3. **Cheltenham's identity (70 respondents)** Cheltenham is famous as a 'town in a park' and 'capital of the Cotswolds' with its avenues of trees and surrounded by beautiful countryside. Leckhampton Hill and its views are crucial to Cheltenham's setting and character, as well as to its attractiveness and high quality of life. From the Hill, the green spaces of the Leckhampton Fields brings out the greenness of Cheltenham and also make a link with the past before Cheltenham grew as a town. The area still looks like a collection of villages that have grown together, still with green spaces.
4. **Cheltenham's national reputation (49 respondents)** The views from Leckhampton Hill are known nationally. They are views that Cheltenham should be very proud of, particularly the iconic views from the Devil's Chimney and Observation Table. They are an important part of what makes Cheltenham so special and are one of the joys of living here. These are views people elsewhere yearn for. Visitors are always stunned by the views and say how lucky we are to live in such a beautiful place. It is not only the views to Wales, the Malverns and Shropshire that one admires but also the view of Cheltenham itself and of the Leckhampton fields below.
5. **Cultural and scientific interest (12 respondents)** From the top of the Hill one can observe and study the geology spanning 700 million years, the geography, history, communities, farming and land-use. The history and settings of the towns and landmarks in the Severn Valley can be well appreciated from the Hill, especially on a clear day.
6. **Environment and wildlife (4 respondents)** Leckhampton Hill is important for its ecology, environment, wildlife and views of nature.
7. **Exercise, running and walking (21 respondents)** I/we/our family regularly walk/run on Leckhampton Hill. It is the views that above all make the Hill unique and such a wonderful place – not only the distant views but also the beautiful foreground.
8. **Family and friends (66 respondents)** The Hill is a great place to go with family and friends to admire the views walking together or having picnics, or walking the dog on the Hill and feeling on top of the world. We love the views and always show them to people visiting us. The views can be especially amazing at sunrise and sunsets and with special cloud effects. We must not diminish this wonderful place. Its inspiring magical views add so much quality to living, working in and visiting the Cheltenham area.
9. **Leckhampton Fields add extra pleasure (2 respondents)** Whether walking towards or back from Leckhampton Hill, the Leckhampton Fields make an important contribution to the pleasure
10. **Leckhampton Fields matter even more (15 respondents)** Whilst greatly appreciating Leckhampton Hill and its wonderful views, for me/us personally the Leckhampton Fields matter even more.
11. **Future generations (53 respondents)** Cheltenham and Tewkesbury Borough Councils need to treasure and at all costs conserve this beautiful and historic landscape for current and future generations; they seriously risk ruining it by overdevelopment. These stunning views are an inheritance we must pass on.
12. **Health - keeping fit (25 respondents)** The amazing view is a good inducement to walk up and along the Hill and keep fit.
13. **Health and well-being (30 respondents)** Walking up/along the Hill and admiring the views is very good for mental health and relieving stress, as well as for exercise. One gets

a great feeling of wellbeing simply being surrounded by such beautiful countryside and open air.

14. **Historic views (24 respondents)** The landscape is beautiful and historic, an ancient landscape that retains past beauty; great distances that you can see to the far hills plus the historical significance of different sites from the Stone Age onwards
15. **QEII status (2 respondents)** Why have Leckhampton Hill and the Leckhampton Fields not got QEII protection like Burrows Field and Weavers Field?
16. **Reason that we live here (60 respondents)** Having Leckhampton Hill and its wonderful views are one of the main reasons that we live / work here.
17. **Rural foreground is equally important (35 respondents)** It is not just the distant views that matter, wonderful though they are. The rural foreground of Leckhampton and the Leckhampton Fields is also extremely important because of its greenness, its richness of features adding so much to the interest of the view, and its pastoral beauty that sets the atmosphere of the scene. It retains the quality of a typical old English landscape of small green fields, glebe land, smallholdings and orchards divided by ancient hedgerows and with many fine trees. Cheltenham must not lose it.
18. **Rural foreground must be preserved (18 respondents)** The beauty and peacefulness of the view depends very much on preserving the rural foreground of Leckhampton. The dropping away of the Hill to green fields, scattered rural houses, villages and woods is very special. No view is its equal in terms of visual contrast and detail.
19. **Rural/urban balance in the view (7 respondents)** The area currently has the right rural/urban balance. We must preserve this and avoid overdevelopment, particularly suburban estates. The definition of traditional village settlements within their rural setting is still clear for Shurdington and Leckhampton. Proper strategic planning requires protecting this.
20. **Superb views that are nationally famous (64 respondents)** Stunning iconic views, especially on a clear day; one of the finest views in England; nationally famous, a highlight of the Cotswold Way and this part of the Cotswolds, the views are irreplaceable and must be not be spoilt.
21. **Superb views that are rare and irreplaceable (71 respondents)** Great views and landscape - such great views are rare and irreplaceable and must be conserved. The beauty could be lost forever if additional building is allowed. Any development should be well away from the AONB, be well screened and very sympathetic.
22. **Supreme beauty one never tires of (104 respondents)** Breathtakingly beautiful views that one never tires of, ever changing through the seasons, ever surprisingly lovely, so varied, interesting, inspirational, giving an uplifting joy, happiness, calmness and sense of freedom and wellbeing, views that one can absorb and appreciate every day, that are good for the soul, that refresh the mind, expand one's outlook and give perspective on life in this hectic world. These wonderful views draw very many people from near and far to enjoy the Hill.
23. **Stunning panorama (55 respondents)** Open panoramic views that are supremely beautiful, still largely unspoilt and that must be preserved as they are; huge sense of beauty, spaciousness and peace, a panorama that changes with the weather and the season. We and so many other people from near and far get enormous pleasure from

these views: the lovely peace and tranquillity of looking across to the hills - Churchdown, May and Malvern Hills and beyond, and the semi-rural views across the Leckhampton Fields.

24. **Tourism and visitors (83 respondents)** The views draw people continuously and attract tourism to Cheltenham and the Cotswolds. Cheltenham needs to ensure they are properly protected - for visitors and locals.
25. **Value to elderly and less mobile residents (5 respondents)** The views from Leckhampton Hill are very important for old people who can get there by car even if they can no longer climb the Hill. Also important are the views of the Hill from the A46 and across the pig field.
26. **Views across the Fields (24 respondents)** For many people, especially those not in easy walking range of Leckhampton Hill, the views of the Hill from where they live and from the Leckhampton Fields are even more important than the views from the Hill itself.
27. **Views of the Hill (13 respondents)** When walking in the Leckhampton Fields and lanes, the views of Leckhampton Hill are lovely and inspiring. The view of the Hill across White Cross Green from the Cheltenham Circular Footpath is particularly fine and very important to us in the Lanes Estate and to our children.
28. **Vulnerability (34 respondents)** The views and the rural beauty of the Hill and of the Leckhampton Fields could easily be ruined and would be impossible to replace. The green belt still preserves a green corridor west across the Severn Valley, but the proposed development at White Cross Green would cut across that. The Leckhampton Fields provide a crucial green rural buffer between the urban area and the Hill. This buffer softens the urban impact and keeps Cheltenham attractively distant. It must be preserved.
29. **Wonderland Chess Board view (1 respondent - newspaper cutting)** The view from Leckhampton Hill across the fields and hedgerows below is said to have inspired the Giant Chess Board of fields and hedgerows in 'Alice Through the Looking Glass'.

Hundreds of respondents praise the stunning beauty of the Hill and its views at all times of the year. Nearly 300 respondents comment on the importance of the views to Cheltenham's beauty, setting, identity, character, residents, quality of life, reputation and economy and the importance to tourism. Overlapping with question 7, around 100 respondents emphasise the great importance of the Leckhampton Fields to the view and that the view would easily be spoiled by developments.

Sixty respondents say that having Leckhampton Hill and its wonderful views is one of the main reasons that they live or work in Cheltenham and 66 respondents say the Hill is a great place to go with family and friends. The benefits of exercise, walking, running, fitness and benefits to health are mentioned by 76 respondents.

One respondent submitted an interesting press cutting on the origins of Alice in Wonderland, which said that the view from Leckhampton Hill over the fields below is believed to have inspired the giant chess board of fields and hedgerows in 'Alice Through the Looking Glass'. Lewis Carroll took Alice Liddell and her sisters to see the view from Leckhampton Hill in April 1863, when he visited the three sisters while they were staying in Charlton Kings. The 'Looking Glass' was the mirror on the wall of their house in Charlton Kings. Lewis Carroll had begun telling the story of Alice's Adventures in Wonderland to Alice and her sisters in 1862. He wrote the book in 1864 and it was published in 1865.

7. Effect of development coming closer to the Hill.

In question 7, respondents were asked how much they thought it would damage the views if development came closer to Leckhampton Hill. The responses to question 7 have been amalgamated into 29 summaries below.

1. **AONB and Leckhampton (202 respondents)** To look down on modern housing estates rather than the Leckhampton Fields would irreparably degrade this cherished view, diminish the Cotswold Way and the AONB, and make Leckhampton Village part of urban Cheltenham. It would damage the fame of Cheltenham and this beautiful part of the Cotswolds and reduce their attractiveness for visitors and tourism. The loss of the Leckhampton Fields to development would contradict the adopted Cotswolds AONB management plan 2013-18 which asks local authorities to protect the setting of the AONB.
2. **Criminal to spoil such a beautiful viewpoint (70 respondents)** You have only to look at the eye-sore at Brockworth to see how wrong development can spoil a beautiful area. The ruined view from the scarp around Coopers Hill shows how beauty is turned to ugliness. Leckhampton Hill has one of the finest views in the country. It would be a crime to vandalise such beauty, quite unforgivable for such an inspiring and uplifting viewpoint.
3. **Development creep (71 respondents)** There has been a continual erosion of green fields as they have been engulfed by the 'lava flow' of development. The proposed LGS is essential to prevent this creeping development continuing and profoundly spoiling the view as well as destroying local amenities.
4. **Diversity of landscape (32 respondents)** The rural foreground is full of different areas and diversity which add greatly to the views, a lovely mix of fields, orchards, hamlets, Leckhampton Village and the town beyond. Developing here on the scale and style of housing that is being proposed would convert it into a boring housing estate.
5. **Duty to conserve for the future (49 respondents)** We teach children how important it is to conserve the environment. Failing to protect the wonderful and historic views from Leckhampton Hill for the future would set a very bad example and be a great shame, particularly on councillors and planners. We owe it to the next generation to preserve such a naturally beautiful area. Once lost, it can never be recovered.
6. **Duty to conserve Cheltenham's famous viewpoint (48 respondents)** Development would spoil the view and the natural setting and balance of Cheltenham from its most famous viewpoint. Cheltenham will sink even lower as a good place to live if it allows its beautiful and famous local scenery to be despoiled. Cheltenham needs to treasure and not waste what assets it has.
7. **Duty to preserve Cheltenham's prosperity (18 respondents)** Cheltenham needs to preserve and make more of Leckhampton Hill's specialness if it wishes to attract tourists and more employment into the town. Cheltenham needs to attract more investment to create jobs to enable local people to buy new housing. Just building houses does not create jobs. Cheltenham needs to be able to attract employers and jobs and Leckhampton Hill and Charlton Kings Common is one of its main attractions.
8. **Duty to preserve Cheltenham's quality of life (32 respondents)** Development close to Leckhampton Hill would greatly diminish south Cheltenham as a place to live and

Leckhampton Hill as an amenity for Cheltenham residents; the views from the Hill and of the Hill would both be affected.

9. **Duty to respect the views from the Cotswold scarp (28 respondents)** With the developments around Bishops Cleeve and now the proposals in the JCS, Tewkesbury and Cheltenham are in danger of becoming an unsightly sprawl along the Cotswold scarp. Both borough councils have duty to treasure and conserve these wonderful views over the Severn Vale and avoid despoiling them with urban sprawl. It is importance to the view from Leckhampton Hill that one can see a clear edge to the town and that this is sufficiently far away from the Hill to prevent the appearance of urban sprawl.
10. **Impact of development at White Cross Green (SD2) (32 respondents)** Building at White Cross Green (SD2) would greatly damage the view across green belt and conflict with JCS 2012 recommendation not to build on this site or at most to build only on the north field. Building on White Cross Green as currently proposed would slice through the green belt corridor from Leckhampton Hill along the green belt to the Severn Valley.
11. **Impact of size and closeness (29 respondents)** How bad the damage would be must obviously depend on the size of any development, how close it came, whether it affected the AONB, how sympathetic and well-screened it was and what trees and hedgerows might be lost; certainly a large development close to the Hill would be very damaging.
12. **Impact of traffic and pollution (48 respondents)** Development would also create more traffic, noise and pollution that would tend to spoil the rural environment
13. **Impact on environment and ecology (14 respondents)** Development would damage not just the views, but also the natural history and geography, and the local flora and fauna.
14. **Impact on Leckhampton character (22 respondents)** Development close to the Hill would ruin the village-like character of Leckhampton and the rural/pastoral character of the area. It would merge the village into town and reduce the natural open space serving Cheltenham.
15. **Impact on openness (60 respondents)** Development would greatly diminish the rural outlook, openness, sense of freedom and make the view urban, closed in, claustrophobic.
16. **Impact on quality of the views (62 respondents)** At the moment the edge of Cheltenham along the A46 still looks fairly distant and the eye can skip across Cheltenham and also along the green belt to the Severn Vale and distant hills beyond. Developing closer would be much more intrusive and damaging in this location. It would change and spoil the special nature of this area. The distant views would still be wonderful but overall the view would be much more urban and no longer so outstanding. One respondent also observes that part of the beauty of the views is the way they recede into the distance and that developing close to the Hill could spoil this by diminishing the sense of height and scale.
17. **Impact on risk of flooding (31 respondents)** There is wide concern among residents over how development might affect floodwater flow off the Hill
18. **Impact on rural/urban balance (72 respondents)** Major development close to the Hill would spoil the good rural/urban balance and interest of the view; turn it into urban sprawl.

19. **Impact on views from the scarp (7 respondents)** The views from the AONB above Leckhampton Manor are quite special and would be damaged just like the views from the top of the Hill.
20. **Impact on views of the Hill (21 respondents)** Development would damage views of the Hill as well as views from the Hill. The views of the Hill are very important to local people and to Cheltenham. As well as the views from the Fields themselves, there are also the views of the Hill from the A46 and west of the A46 including the cherished view across the pig field at the 'gateway' to Cheltenham, which provides so many people, residents and drivers, with a beautiful uninterrupted view of the Hill. The views of the Hill are also important to the skyline from the town; without them the town would be more oppressively suburban.
21. **Impact on wildlife and the rural character (71 respondents)** Development would irretrievably spoil the views, character, rural feel of the area; would make the Hill and view suburban; it would also affect the wildlife and reduce the enjoyment of both the wildlife and the views.
22. **Importance of the rural foreground (32 respondents)** The rural foreground of Leckhampton Village and the Leckhampton Fields beyond is vital to the idyllic view from Leckhampton Hill. The patchwork of green fields, with their different hues through the seasons, is a wonderful part of the beauty. The foreground complements the wide distant views across the Severn Valley. Development would certainly blight the view both through the loss of these beautiful fields and through bringing urban Cheltenham much closer to the Hill.
23. **Must protect LGS, AONB and Green Belt (19 respondents)** There must be no development in the proposed LGS area, AONB and greenbelt; any development close to the Hill will spoil/damage the views irreversibly.
24. **No scope for major development (25 respondents)** The Lanes Estate and other development, such as Morrisons, have already tarnished the view. Any further encroachment would destroy the whole character of the area. Nothing closer please.
25. **Scope for some sympathetic development (24 respondents)** Some sympathetic pockets of development might be possible provided they were small and in keeping, were not too high or close to the AONB, and provided they did not lead to development creep.
26. **Sympathetic development along the A46 (5 respondents)** Just in terms of the views from Leckhampton Hill, some development on the Northern Fields along A46 could be acceptable but it would reduce the view of the Hill from the A46. So it would be regrettable to have development on the Northern Fields.
27. **Sympathetic development close to the Hill (13 respondents)** It is essential to ensure that any development on the Leckhampton Fields is sufficiently sympathetic. The density and style of any development is hugely important; suburban estates loved by developers would be an eyesore if they were at all close to the Hill, including at White Cross Green. Development on the orchards/nurseries east of Kidnappers Lane would only be acceptable if it was very sympathetic and attractively well screened with trees, preserving the trees within the site as well as the hedgerows. The trees in the old orchards are worth preserving as far as possible.

28. **Sympathetic development – protect Medieval Leckhampton (8 respondents)** It would be vital that any development did not affect the settings and views of Leckhampton Court, St Peters Church and the old cottages of Medieval Leckhampton.

29. **White Cross Green (SD2) – suggestions for reducing the impact on the view (5 respondents)** Having a wide corridor of green space on the north side of any development on White Cross Green could avoid it appearing to be a single conurbation with the Lanes Estate. Also, extending the strip of LGS west of Farm Lane all the way to Leckhampton Lane would help to screen any development from Farm Lane and from Leckhampton Hill.

The overall theme of the responses is horror at the prospect of development coming closer to the Hill. There is a lot of emphasis on the duty of councillors and planners to protect Leckhampton Hill and its views for their importance to the fame of Cheltenham, for attracting tourists and employers, to the quality of life of Cheltenham and in making this a place worth living in, and for its importance to the Cotswold scarp, AONB and Cotswold Way. Seventy respondents specifically cite the damage that has been done to the AONB and to the views from the Cotswold Scarp particularly around Brockworth as a warning of what could happen to the views from Leckhampton Hill without proper care. Seventy-one respondents cite the danger from development creep and the role of the LGS in limiting further erosion of the green space.

Hundreds of respondents comment on the different ways that development would spoil the views – taking away the openness and diversity, destroying the small village character of Leckhampton in the foreground, on the great importance of the Leckhampton Fields to the view and of preserving the green gap between Leckhampton Village and the Cheltenham conurbation, the need to keep the right rural/urban balance and to prevent this becoming predominantly a view just over urban Cheltenham. Respondents emphasise the importance of the rural foreground and the way the patchwork of green fields, with their different hues through the seasons, is a key part of the beauty seen from the Hill. Respondents also highlight the impact that development at White Cross Green would have on the view west to Wales by slicing right through the green corridor from Leckhampton Hill along the green belt to the Severn Valley beyond.

Some respondents make the obvious but valid point that the impact of development would depend on its scale, closeness to the Hill and on how well screened and sympathetic it was. The question of course is how one could control any development so that its impact is acceptable. A small number of respondents comment on this and also on the scope for sympathetic development along the A46. Overall, however, respondents are clearly nervous that whatever good words are said about sympathetic development, planners will not be able to constrain profit-driven developers from spoiling the views.

8. Conclusions

The consultation has confirmed what was well established from previous surveys and petitions (see Appendix 2) that the Leckhampton Fields are very special to a large number of local people and that they are well used by residents on all sides. The number of people responding was about two-thirds of the over two thousand people who signed the petition on the Leckhampton Fields in July 2011. This is impressive given the very short consultation period with people having only a few days to reply. Completing the questionnaire was also more onerous than signing a petition and the postage for the reply was not prepaid. The consultation also only covered homes up to 0.7 miles from the Fields, and there are many people who use the Fields

from further away. So overall this was a strong response and the answers to questions 5 to 7 show how highly people value the Leckhampton Fields and the views from Leckhampton Hill.

The close agreement between the actual usage of Lotts Meadow measured in an on-the-ground survey in 2011 (Table 7) and the usage calculated from the consultation replies suggests that at least 80% of people who use the Fields frequently replied to the consultation and it also adds confidence to the figures for how much people use the other parts of the Leckhampton Fields. The central fields in the triangle bounded by Kidnappers Lane, Farm Lane and Church Road come out as the area that people use most, no doubt because of its network of footpaths and because it is easily accessible from all sides. Lotts Meadow comes out second, which is not surprising given the amount that the Meadow is used particularly for dog walking. White Cross Green is the least used area at about 40% of the usage of the Central Fields. Again this is not surprising as White Cross Green is furthest away from most local residents. The usage of the smallholdings, Robinswood Field and the circular walk(s) supports the Council's view that these areas need to be preserved as much as possible.

Table 4 and answers to question 5 confirm that people use the Leckhampton Fields mainly for walking and dog walking from their homes but also for a variety of other activities including with children. The Leckhampton Fields are a great local asset and the through the neighbourhood plan consultation the Parish Council needs to find out what would attract more local people to use the amenities and how these might be extended. The publicity and map provided through the LGS public consultation has already encouraged more local people to use the fields more extensively.

The analysis in Tables 9 to 11 suggests that an important factor in how often people use the fields is how long it takes to walk there from home. If development occurs on the Northern Fields it will be important to have the access through the LGS corridor along Hatherley Brook as well as retaining the current access via the smallholding vehicle track or equivalent road. Access via Farm Lane can certainly be helped by better maintenance of the two footpaths on the Farm Lane side of Hatherley Brook. From the north, the access to the north corner of Lotts Meadow and to the Moorend Stream footpath could be improved by one or two simple wooden bridges across Moorend Stream where currently people have to jump or walk downstream to the footpath.

One factor that deters more people from using the Leckhampton Fields in winter is the mud and flooding in Lotts Meadow and also along the footpaths west of Hatherley Brook. A small amount of improvement to the paths could make a big difference to their use in winter.

It is clear that many people greatly value the opportunity for exercise provided by the Leckhampton Fields. It would be worth looking at whether one can increase the benefits to health and fitness. Walking is certainly beneficial to health, but so also is more vigorous exercise. The Council looked recently with County Councillor Iain Dobie, at the possibility of installing some outdoor exercise facilities on the Leckhampton Fields. This is worth considering further.

It is significant that in the answers to question 4 on what features of the Leckhampton Fields people most value, the old nurseries are valued least and also that there have been no specific objections to removing from the LGS the nurseries/orchards site east of Kidnappers Lane. Of course, the point is made strongly in answer to question 7 that any development on this site needs to be very sympathetic and well screened given the closeness to the AONB and the potential damage to the view from Leckhampton Hill. Hedgerows, trees and orchards are among

features that are highly valued and this is another reason they need to be conserved in any development on that site. This needs to be considered in detail in the neighbourhood plan, and the planning policies need to be tightly defined in order to ensure that any development is appropriate.

The consultation questionnaire specifically asked people to give their views on the updated local green space and specifically whether there is any other area currently included that could be left out. In response to question 5, 32 respondents said that the Parish Council was wrong in reducing the LGS at all from what was proposed in 2013 and there were over 200 comments on areas that respondents felt should not have been removed. On White Cross Green, 88 respondents argued that there was too little amenity land protected on the northern side for local residents and many respondents emphasised the importance of protecting the beautiful view of Leckhampton Hill from the Cheltenham Circular Path. Eighty-three respondents emphasised the importance of preserving the Northern Fields and smallholdings, if at all possible. Cheltenham's MP, Martin Horwood, was one of the respondents who argued most strongly that the Parish Council should seriously consider putting the Northern Fields and smallholdings back into the LGS. There were no suggestions for any other areas that might be removed from the LGS.

With regard to White Cross Green and the Northern Fields, some key points for the neighbourhood planning are:

1. To try to locate the amenity land on White Cross Green to preserve the view of Leckhampton Hill from the Cheltenham Circular Path as much as possible. This emphasises the importance of locating the amenity land at the north-east corner of White Cross Green since the fall of the land to the west makes it hard to preserve the view from that section of the Circular Path. Re-routing the Circular Path might also be a way to preserve the views better.
2. It is important to preserve not only the southern smallholdings but also the strip of smallholding north of the footpath. The design of any development on the Northern Fields should try to retain some views of Leckhampton Hill from the A46. The view across the pig field at the corner of Kidnappers Lane and the A46 is particularly important.
3. The farm animals on the Leckhampton Fields are highly valued and one should conserve what remains of the 'city farm' on the smallholdings and try to restore the previous diversity, particularly by bringing back the pigs.

Although not really germane to the LGS, the issues of sustainability and particularly of traffic congestion were raised by many people. The neighbourhood planning needs to look at how the impact of any development on the traffic can be reduced. One idea considered in developing the neighbourhood plan concept was to put more emphasis on housing for retired people since this would add much less commuter traffic to the peak traffic problem. This deserves further thought including the possibility of a garden village style of development on the Northern Fields.

Respondents gave a great deal of information in their answers to questions 5 to 7 and this took a very long time to amalgamate and précis into the 154 summaries in sections 5, 6 and 7. The overwhelming message is how highly people value the Leckhampton Fields both as a local amenity and also for their importance to the views from Leckhampton Hill.

Another strong message is the need for the neighbourhood plan to ensure that any development is appropriate and sustainable and the need for the LGS to protect the area. The inclusion of the Leckhampton Fields as a strategic development site in the JCS has already led to developers and landowners doing a lot of deliberate damage to remove impediments to development. On

the central fields, an old orchard has been chopped down, footpaths blocked and mature trees destroyed. On White Cross Green Redrow have heavily damaged the ancient hedgerows to deter wildlife and have chopped down a group of trees along Farm Lane where they want to put through a road. It is essential for the land to have permanent protection from development as LGS; otherwise developers and landowners may continue to damage the area in order to bolster the opportunity for a future planning application.

Annex C

Evidence submitted in May 2019 by LWWH Parish Council to GCC on the proposed expansion of Leckhampton Primary School and the implication for the proposed new secondary school on Farm Lane

1. Traffic congestion

The traffic problems with the proposed expansion are serious given the very bad congestion in Church Road in the morning traffic period and the way the traffic flow is already disrupted by traffic to the school and by parents manoeuvring vehicles. Church Road is also a key route to the proposed new secondary school on the GCC land at Farm Lane. If the expansion of Leckhampton Primary caused Church Road to become impassable in the school-run period this would have a big impact on the viability of the secondary school, particularly if there were many students coming to the secondary school from the Old Bath Road area and Charlton Park ward. The secondary school is only included in the Cheltenham Plan on the proviso that the traffic problems can be solved, and this proviso has been confirmed by Inspector Burden in examining the Plan.

Solving the traffic problem depends on several factors but strongly on whether the mitigation proposed by Gloucestershire Highways of adding a second in-going lane on the A46 at the Moorend Park Road junction will increase the throughput of the junction sufficiently. At the transport session in the Cheltenham Plan Examination, Gloucestershire Highways proposed that the second in-going lane could be accommodated within the existing road width by making the lanes and pavements narrower. However, we have measured the road and pavement widths and we doubt that it is possible to accommodate the two lanes without unacceptably narrowing the pavements and the lanes. There is a problem with narrow lanes that the traffic will flow more slowly and this can negate much of the benefit of having two lanes. The impact of slower speeds in greatly worsening the long A46 traffic queue and travel times was starkly demonstrated last autumn when the A46 was resurfaced and cars were approaching the junction more slowly because of the rough road surface. The narrow lanes would also leave no room for cyclists and that means cyclist would have to be in line with the traffic, again slowing the vehicle speed as well as increasing the danger. Therefore the two lane scheme may require compulsory purchase of land from front gardens of the houses on the west side of the A46 so that the traffic lanes and pavements can be made sufficiently wide. There is then the issue of whether compulsory purchase would succeed, particularly because there is a potential alternative of expanding Balcarras School in order to cover the shortfall in secondary school places in Charlton Park.

The Leckhampton Primary expansion could turn out to be the critical factor in determining whether or not the secondary school is viable. This is something that should be carefully checked from traffic modelling at this stage. We are aware that the Paramics traffic modelling by Gloucestershire Highways covers the local traffic system including Church Road, Hall Road, Kidnappers Lane, Leckhampton Road and Moorend Park Road as well as the A46. Has this modelling been used to inform the decision about expanding Leckhampton Primary, and what is the model showing?

The other key question is what can be done realistically to encourage parents to bring children to the school on foot rather than by car. Because the expansion will increase the catchment radius of the school, many of the 210 extra children may have to travel three-quarters of a mile or more to the school. Although the statutory walking distance for primary pupils is two miles,

national statistics suggest that at least half of the 210 children are likely to come by car. Parents tell us that they just do not have the time to walk their children a considerable distance to and from the school, especially if they are working parents as the vast majority are. According to government statistics, Cheltenham has one of the highest employment rates in England for parents with dependent children: 96% for fathers, 89% for mothers in 2017, extrapolating to >90% for mothers in 2018, with at least a half of mothers with primary school children in Cheltenham likely to be working more than 30 hours per week (reference: [Families and the labour market, England - Office for National Statistics](#)).

The primary school reception-year allocations that you have recently published suggest that even in this bulge year there are 34 reception places still unfilled at Cheltenham primary schools within 2 miles of Leckhampton Primary (Lakeside - 17, Naunton Park - 7, St. John's - 9 and Warden Hill - 1). There are also 12 unfilled places at Shurdington Primary. When planning permission was granted for the 377 houses being built west of Farm Lane it was on the basis that primary school children from that development would attend Shurdington Primary. But we are aware that the builders are promoting the new houses on the basis of being accessible to Leckhampton Primary. So the spare capacity at Shurdington Primary may be relevant to the need to expand Leckhampton Primary. You are also currently planning to expand Warden Hill Primary School to three form entry, which would add another 30 reception places. So even though the educational case to expand Leckhampton Primary may be strong based on its OFSTED outstanding rating and its popularity with parents, it is still not absolutely essential to proceed with the expansion if the traffic problems dictate otherwise.

2. Pollution levels near Leckhampton Primary School

The Parish Council also has grave concerns over the levels of pollution at the school and the threat to the future health of the children there. GCC made a spot measurement of the pollution levels outside Leckhampton Primary School in March 2017. This showed an average level of NO₂ of around 110 micrograms per cubic metre (ug/m³) over the 08:00 to 09:00 period whilst children were travelling to the school. This level was twice as high as that measured by GCC at any other school and is worryingly close to the EU short-term exposure limit of 200 ug/m³ over an hour, not permitted to occur more than 18 times in a year. In the past year we have installed a network of NO₂ sensors at various locations in the Parish including in Church Road. These provide measurements of the average NO₂ levels, but unfortunately we have been unable, for technical reasons, to make any further spot measurements of short-term exposure to NO₂ near the school over the 08:00 to 09:00 period. We have, however, been able to make accurate measurements of pm₁₀, pm_{2.5} and pm_{1.0} particulate levels at the school over the 08:00 to 09:00 period and these do show alarmingly high levels of particulate pollution on many days.

A copy of the measurements has been emailed to Tim Browne. They were made on 24 mornings in the period from Friday 12 October 2018 to Friday 30 November 2018. On each occasion, 15 samples were taken covering the full hour 08:00 to 09:00, each sample being over a period of 4 minutes. Three of the 24 days occurred during the October half-term holiday and they showed the particulate level that one might expect for the peak traffic period in this busy road. The average pm_{2.5} levels over the hour were 17ug/m³, 10ug/m³ and 4ug/m³ respectively on the three days during half-term. These levels should be compared against the EU permitted pm_{2.5} level of 25ug/m³ and the World Health Organisation (WHO) recommended permitted level of 10 ug/m³, those permitted levels being for the average level over a year rather than just during the peak traffic period. For primary school children the WHO limit is the appropriate level to use taking into account that pm_{2.5} particulates accumulate in the body over

a lifetime causing cumulative harm and are also more threatening to children because their lungs and bodies are developing.

On many of the school days the measured pollution levels of pm10, pm2.5 and pm1.0 were very much higher than during the half-term holiday. For pm2.5 the average level over the hour was 26 ug/m³ on Monday 29 October, 36 ug/m³ on Thursday 15 November, 47 ug/m³ on Thursday 1 November, 70 ug/m³ on Thursday 22 November, 79 ug/m³ on Monday 26 November, 117 ug/m³ on Friday 16 November, 126 ug/m³ on Monday 5 November, and a colossal 140 ug/m³ on Friday 23 November.

In the detailed data provided to Tim Browne, the individual 4 minute samples on the days with high pollution levels show the pollution levels building up steadily over the 08:00 to 09:00 period to reach a maximum level at about 08:40 and remaining flat or declining slightly towards 09:00. This correlates with the degree of congestion and the way that the traffic to the school causes the traffic to build into long slow moving queues in both directions. Without the school traffic the vehicle flow is much faster with queues moving alternately in each direction rather than locked together. So it is a reasonable hypothesis, but no more than that, that the high pollution levels build up because the cars move so slowly and spend much more time near the school.

The data shows a large variation in pollution levels from day to day. This does not seem to correlate with particular weather or wind direction and is probably due to various degrees of atmospheric inversion or air flow trapping the pollution near ground level. Church Road is narrow with houses on either side very close to the road and this adds to the risk of vehicle pollution being trapped. However, on some of the school days the measured pm2.5 level was quite low. So the average exposure of children at Leckhampton Primary will depend on how many days in the year have conditions that cause the pollution to be trapped near ground level. More measurements need to be made at various times of the year and also in summer when photolytic decomposition of the NO₂ emissions will add to the particulate levels.

We have not made any further measurements at the school since 30 November, but we are planning to recommence measurements shortly. However, we have checked the sensor against DEFRA standards and confirmed that the measurements are accurate. Again to put the measurements at Leckhampton Primary into perspective, London has an average pm2.5 level of 12 ug/m³. So if we worry about the health of school children in London we also need to worry about Leckhampton Primary. Of course, the levels at Leckhampton Primary will not be as high over the whole day as they are in the peak traffic period. But 08:00 to 09:00 and particularly 08:30 to 08:50 when the levels in Church Road are highest (peaking at 169 ug/m³ from 08:40 to 08:48 on 23 November) is the time when children are arriving at the school.

The threat to school children from traffic pollution and particularly from pm2.5 has been highlighted in the press very recently. The Times on 9th May 2019 carried the front page headline 'School air pollution scandal' and has launched an urgent campaign for a new clean air act including proposals for temporary traffic bans outside schools at drop-off and pick-up times. It would be possible to exclude non-resident cars from around many primary schools including Warden Hill Primary between 08:00 and 09:00. But it would be impossible to apply this to Leckhampton Primary because Church Road is a major traffic route round Cheltenham.

It therefore seems to the Parish Council that it would be dangerous to proceed with the expansion of Leckhampton Primary without more information about the pollution and a plan of what to do if further measurements demonstrate that the health hazards to children at the school are unacceptable. Certainly it seems unwise to rush into expanding the school or extending its

catchment since that would promote more travel to the school by car. GCC also needs to consider the impact of the expansion on the viability of the proposed new secondary school if it is located on the GCC land at Farm Lane, particularly if that school is intended to cover the shortfall in secondary school places for students living in Charlton Park.

Annex D

From: ADRIAN MEARS <adrian_mears@yahoo.co.uk>
To: "tracey.smith@cheltenham.gov.uk" <tracey.smith@cheltenham.gov.uk>
Cc: "john.rowley@cheltenham.gov.uk" <john.rowley@cheltenham.gov.uk>; Tim BROWNE <tim.browne@gloucestershire.gov.uk>; Tim Partridge <tim.partridge@rpsgroup.com>; "jamie.mattock@gloucestershire.gov.uk" <jamie.mattock@gloucestershire.gov.uk>; Margaret White <margaretstephensonwhite11@gmail.com>; Arlene Deane <clerk@lwwhpc.org.uk>; "clare.medland@gloucestershire.gov.uk" <clare.medland@gloucestershire.gov.uk>; Martin Horwood <martin2@martinhorwood.net>; Cllr Iain DOBIE <iain.dobie@gloucestershire.gov.uk>; Stephen Cooke <stephen.cooke267@btinternet.com>; Tony Oliver <anton1@btinternet.com>; Klara Sudbury <klarasudbury@hotmail.com>
Sent: Friday, 8 March 2019, 16:02
Subject: Paramics modelling of the impact of the proposed secondary school

Inspector Wendy Burden
Thru. Tracey Smith
Cheltenham Borough Council

Dear Inspector Burden

At the session on transport on 27th February GCC Highways undertook to send the Parish Council the details from their Paramics modelling so that we could get our Paramics consultant to evaluate the modelling and the conclusions. I also asked to know how much the proposed mitigation of the A46/MPR (Moorend Park Road) junction was predicted to improve the throughput of the junction, noting that the throughput of traffic inwards on the A46 has declined by about 100 vehicles per hour over the past 6 years because of the increase in traffic on Moorend Park Road which is taking up a larger proportion of the traffic light sequence. Jamie Mattock, Team Leader of Highways Development Management, has now informed us that GCC cannot provide any of the information requested because the work is not at a finalised stage.

I did, however, have a useful discussion with one member of the GCC team after the session as I walked back with the team to their car. He told me that the GCC Paramics model and the Miller Homes Paramics model are somewhat different in scope. The GCC model covers just the immediate traffic system whereas the Miller Homes model includes roads to the west, notably Warden Hill Road. When travel time on the A46 becomes very long, Warden Hill Road provides an alternative route into Cheltenham, although this route too is heavily congested, passing the entrance of Bournside School.

With either traffic model the outcome will depend critically on what assumptions are made about the number of students coming by car and where they are coming from. The member of the team I was talking to said that rather than the current assumptions he would be more comfortable using national average figures. These are that for a secondary school on average 23% of students travel to school by car in the morning period, 40% travel by public transport, 35% walk and less than 2% cycle (because of parental concerns over road safety). The percentage walking has been steadily declining, having fallen from about 45% a decade or so ago. He and I agreed that relatively few students would be likely to travel to the proposed secondary school by public transport as the number 10 bus route runs in the wrong directions. So this will increase the proportion travelling by car. However, if the school catchment is truly local the majority of the 40% would be likely to walk. Overall therefore an assumption that around 30% to maybe 35% of students would come to the secondary school by car might be

reasonable. Far fewer would return by car after the school day because the national pattern is that many students are brought by car in the morning but walk home after school.

The figure of 30% is a lot higher than the figure used in the ARUP analysis as shown in the Cheltenham Transport Assessment Part 1. ARUP assume that in the peak morning hour the school would create an additional 146 trips to the school and an additional 86 trips from the school, the difference between 146 and 86 being staff and others travelling just to the school. The 86 trips, if you assume an average of 1.5 students per car, equate to 129 students which is only 14.3% of the 900 students. Even using these much lower ARUP figures the school generates 232 trips in the peak hour whereas 250 dwellings on the Northern Fields generate only 113 trips, making the school simplistically equivalent to 516 dwellings, as I said in the session on 27 February. If 30% of students were coming by car, the school simplistically is equivalent to about 930 dwellings. In reality, however, the impact on the traffic network would depend critically on how many trips come via the A46/MPR junction and via Church Road and hence on the number of students coming from Charlton Park Ward as discussed in the evidence the Parish Council submitted in April 2018, which you have. As the member of the GCC team said to me, the morning school run is a huge problem for the traffic network. It is very important to do as much as possible to reduce it.

I am copying this to John Rowley CBC, Tim Browne (GCC Head of Education), Clare Medland (GCC Education), Tim Partridge (RPS for Miller Homes) and Jamie Mattock (GCC Highways) and to the appropriate GCC and CBC councillors.

Yours sincerely

Dr Adrian Mears CBE
Chairman
Leckhampton with Warden Hill Parish Council

Our Ref: 13870

11 June 2019

Mr John Rowley
Cheltenham Borough Council
Municipal Offices Promenade
Cheltenham
Gloucestershire
GL50 9SA

Dear Mr Rowley,

Local Green Space designation consultation

I write with regard to the recent consultation on the Cheltenham Local Plan, specifically the Local Green Space designations. I write in my capacity as planning agent for application 19/00471/FUL for Erection of two self-build dwellings and associated works at Little Vatch Farm Lane Leckhampton (the Site).

The Site is affected by the proposed Local Green Space designation, as is a large area of the land surrounding the site. It is our client's position that the site is not suitable as a Local Green Space and thus we raise an objection to the proposed policy.

The Site is bounded on all but its eastern side by existing development. It also relates well to the proposed new school site, which it shares part of a boundary with. As such the Site acts as an "infill plot" given the linear continuation of built form on the east side of Farm Lane. To the north of the site is The Vatch and to the south is Leckhampton Farm Court.

Whilst there is a public right of way to the south of the site there is no actual public access to it. The site is well screened by existing hedgerows and vegetation and thus it offers no significant visual amenity.

It is also highly likely that the proposed new school site will be removed from the Local Green Space designation and if that is the case the Site will almost become a random "island" of space serving no practical purpose.

Given these factors it is hoped that the Site will be removed from the designation.

It is hoped that these comments will be fully considered as part of the modifications and further examination process.

Yours sincerely

For and on behalf of Evans Jones Ltd

**Mark Campbell MRTPI
Principal Planner
Tel. 01242 531412
E-mail: mark.campbell@evansjones.co.uk**

John Rowley

From: Conor Flanagan <Conor.Flanagan@blackboxplanning.co.uk>
Sent: 06 June 2019 22:27
To: John Rowley
Subject: RE: Local Green Space designation consultation

Dear John,

Thank you for your email to formally invite comment on the potential LGS designation at Leckhampton. My comments are submitted on behalf of Redrow Homes in respect of land under their control located adjacent to Leckhampton Farm Court.

For clarity, I do not repeat the comments set out in either our Regulation 19 representations or our Matter 4 Hearing Statement for the Cheltenham Local Plan examination. The position of Redrow Homes with regard to LGS designation at Leckhampton stands as set out in those earlier representations.

In addition however, having specific regard to land adjacent to Leckhampton Farm Court, I would reiterate the following key points which accentuate the reasons why the land does not meet the high bar set by national policy and guidance in terms of appropriateness for LGS designation.

- The land is privately owned with no public access. No public footpaths/bridleways/ROWs cross the land meaning it has no recreational value compared to other fields at Leckhampton which are crossed by a series of public footpaths;
- The land is enclosed by mature dense hedgerows meaning views across the site are limited;
- The character of the land holds nothing of special or unique character. It is former pasture land with derelict agricultural buildings and intermittent trees across the field. Large areas of the field have succumbed to brambles bushes over a number of years. The field is also surrounded by existing development to the north (Leckhampton Farm Court), west (recent Farm Lane development) and south (cottages and dwellings located along Church Road/Leckhampton Lane);
- It was noted with interest that during the Matter 4 Hearing Sessions, Councillor Horwood on behalf of the Parish Council helpfully informed the Examination that he pioneered the LGS designation with Government Ministers whilst sitting as an MP (during the Lib Dem/Conservative Coalition Government), with the primary objective to create a new designation within national planning policy, with the intention on Mr Horwood's part (as he confirmed in the hearing session) to protect Leckhampton fields from development. Regrettably for Mr Horwood, his intended designation is not what subsequently transpired in National Policy and Guidance, and his submissions clearly demonstrated the erroneous interpretation of the LGS policy taken by the Parish Council in its proposed LGS area at Leckhampton;
- For these reasons and those set out in previous submissions, Redrow Homes object to the inclusion of this land within any potential LGS designation at Leckhampton Fields.

We are happy to provide the Council with photographic evidence to supplement the above if helpful.

Kind Regards
Conor

Conor Flanagan MRTPI
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Sent from [Mail](#) for Windows 10

From: John.Rowley@cheltenham.gov.uk <John.Rowley@cheltenham.gov.uk>

Sent: Tuesday, May 14, 2019 2:56:02 PM

To: Conor Flanagan

Subject: Local Green Space designation consultation

Dear Conor

We are writing to you as an agent for the Land in adjacent to Leckhampton Farm Court in Leckhampton in connection with the potential Local Green Space designation in the Council's emerging Cheltenham Plan. If you do not represent this land then please let me know.

The Cheltenham Plan is currently under independent examination. Following hearing sessions in February the Inspector issued a post hearing advice note. In response the Council has committed to reassessing the proposed LGS designations. We are formally notifying you of this and seeking your client's views to input into this process.

All relevant background documents and information can be found on the Council's website:

www.cheltenham.gov.uk/localplan

If you have any evidence to support or object to a LGS designation in Leckhampton please send it to us by 7 June to localplan@cheltenham.gov.uk or by post to:

Planning Policy
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
GL50 9SA

If you have already sent comments on this issue to the Council previously, via consultation or through examination hearings, then please do not send the same information. Any changes to the LGS designations will be included in a Main Modifications consultation.

Please do not hesitate to contact me if you have any questions.

Yours sincerely

John

John Rowley

Planning Policy Team Leader

Cheltenham Borough Council

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