

The Parish Council of Leckhampton with Warden Hill

Cheltenham, Gloucestershire

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6th December 2015

Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Examination in Public Local Green Space – Common Ground Review

FOA Inspector Elizabeth C Ord LLB(Hons), LLM, MA, DipTUS

Dear Inspector Ord,

At the JCS Examination in Public session on the Leckhampton Fields Local Green Space (LGS), held on 23rd July 2015, you asked the various parties supporting the LGS to submit an analysis of their priorities for the LGS. The Parish Council submitted a response to you on 28th September (EXAM121), but because we were all very heavily engaged throughout September with the Appeal Inquiry on application 13/01605/OUT, we did not have time to get full agreement to the response from all parties. Section 6.7 concerning White Cross Green required adjustment and we need to draw to your attention to the two points below.

1. The first paragraph of Section 6.7 of EXAM 121 includes the sentence: *'The Council notes that Natural England and the Cotswold AONB Management Board are markedly more relaxed about development on the White Cross Green / SD2 site compared with their serious concern about the Bovis-Miller development as proposed in 13/01605/OUT'*. This sentence was based on Natural England's letter of 5th August to Joan Desmond, the Case Officer for application 14/00838/FUL from Redrow for development on the SD2 site. However, taking into account other statements from Natural England, we were reading too much into that letter and I would be grateful if you would kindly put aside this particular statement. The key point in section 6.7 is that we do not see any scope to alter the LGS as proposed on the White Cross Green / SD2 site.
2. The second issue relates to a statement in the same paragraph: *'the SD2 development will look like a peninsular of housingIn principle the eye can skip over this peninsular so that it does not significantly 'interrupt' the view along the green belt corridor....'* Whilst the LEGLAG Committee did agree to accept the January 2015 revision of the LGS boundary, their feeling is that the eye will not easily skip across the development and that it will seriously mar the view. This is also what is said in the 2012 JCS Landscape and Visual Sensitivity and Urban Design Report, which recommended that there should be no development on SD2 or at most only on the NE field so that it did not significantly protrude across the green belt corridor. However, the intended point in section 6.7 was not to belittle the impact on the view; it was that development on SD2 would add further weight to the arguments not to allow development on the land east of Farm Lane. The fact that development on SD2 as currently proposed will cut across the green belt corridor is also an argument in favour of adding SD2, or at least the west and south parts of SD2, into the green belt.

In October, Holly Jones asked us to provide you with a map to make it easier to identify the various issues and areas of disagreement over the LGS boundary. On the attached map we have labelled individual areas and then in the accompanying table and supplementary notes we have identified which areas are disputed and how each area rates against the priorities identified in the public consultations and in the

analysis submitted on 28th September. We hope that this will meet what you need. On the Leckhampton LGS Map we have also highlighted the dense network of footpaths and the excellent accessibility from all directions which are key elements in the recreational/social value of the Leckhampton Fields and which were highlighted by the Inspector's comments in 1993 that the land should be protected, '*because of its varied topography, landscape history, dense network of footpaths, and pedestrian access from several residential districts*'. Together with the LGS map we have included, for comparison, the masterplan map that was produced by the Developers Consortium in conjunction with the JCS team so that you can see where the LGS differs from the green space in that masterplan.

The supplementary notes make reference to several other documents which are included as annexes. One is a letter (Annex D) from the Parish Council to Pegasus Planning Consultants regarding the development they are now proposing on part of the Orchards and Nurseries site (map area ON). Through neighbourhood planning, we are seeking to work with Pegasus PC on a suitably sympathetic development. Another (Annex E) is evidence that the Parish Council gave to the 13/01605/OUT Appeal Inquiry in response to questioning from Inspector Paul Clark. It supports the Parish Council's statement that Leckhampton Hill is a viewpoint of national importance.

A key part of the Parish Council's case to the 13/01605/OUT Appeal Inquiry was the need for the process of examining the LGS proposal through the JCS Examination in Public to be allowed to reach an objective and sound conclusion that commands public respect and confidence. Attached in Annex F is the Parish Council's Summary Proof of Evidence to the Inquiry for your information. In answer to questions in the Inquiry, I said to the Inspector that I did not know how you would handle the examination of the LGS application but that I surmised that you might start from the original application of August 2013, given it was this application that was mishandled, but also noting that there were four options put forward in August 2013 and also noting the revision proposed in January 2015 at the request of Cheltenham Borough Council. I hope this answer was correct. Inspector Clark said to me during the site visit that it would be very helpful to him to know what you will conclude but that he was not able to ask you.

The LGS map, table and supplementary notes, together with the analysis submitted on 28th September as qualified by this letter now come with the authorisation of the Leckhampton Neighbourhood Forum comprising Leckhampton with Warden Hill Parish Council, Shurdington Parish Council, LEGLAG and Cllr. Chris Nelson as the CBC member. Messrs Ken Pollock and Martin Horwood, who also gave evidence to you on the LGS in July, have also participated in agreeing this analysis.

Yours sincerely

Dr Adrian Mears CBE
Chairman and also acting on behalf of Shurdington Parish Council

Countersigned by:

Ian Bickerton CEng
Chairman of LEGLAG and of the Leckhampton Neighbourhood Forum



LWWH Parish Council NPPF Local Green Space Boundary

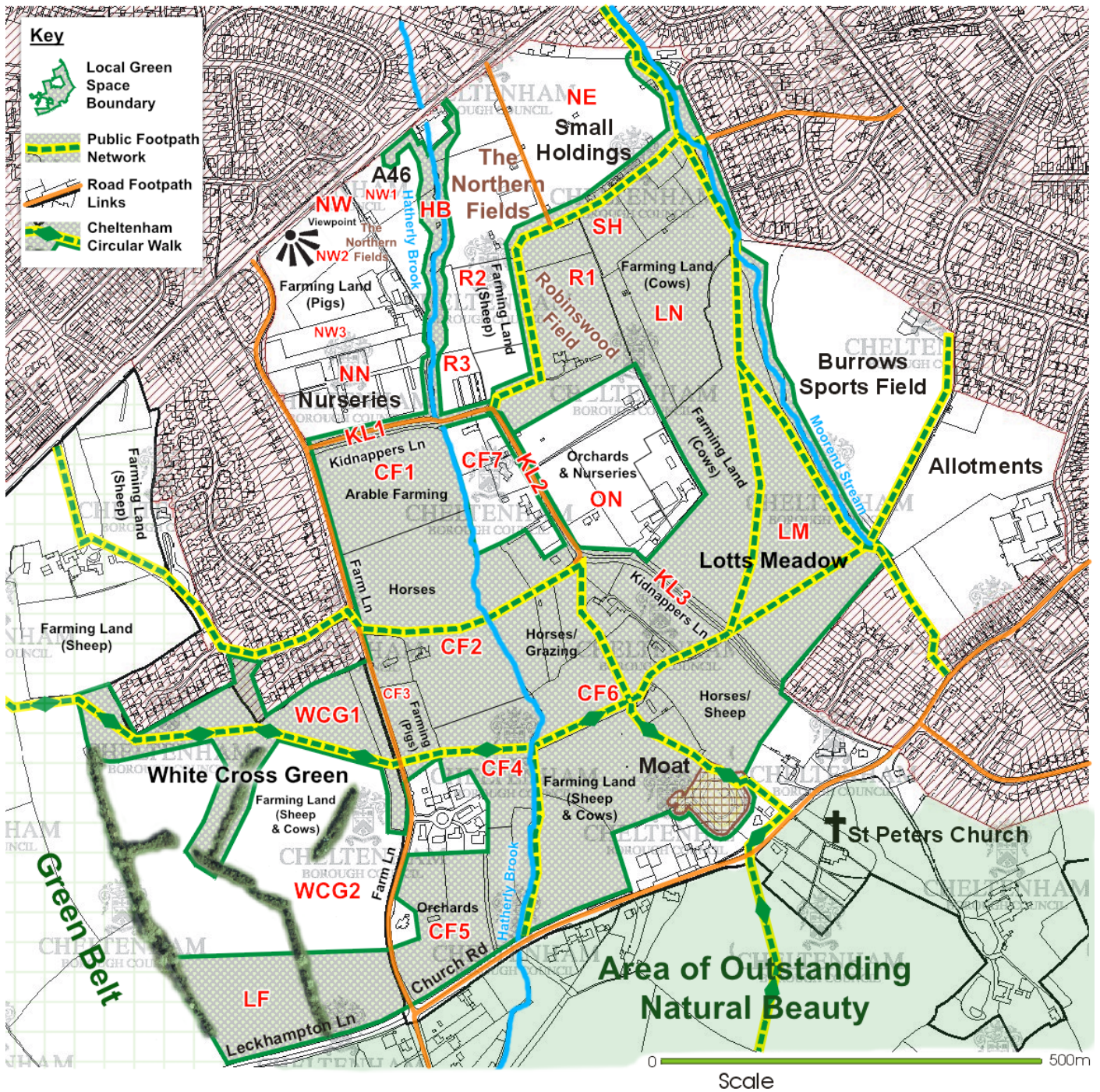


Figure 1 Leckhampton Local Green Space showing the boundary, the area identifiers used in the supplementary notes, the network of footpaths and the public access points

SOUTH OF CHELTENHAM - ILLUSTRATIVE MASTERPLAN



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- APPLICATION SITE BOUNDARY
 - RESIDENTIAL (LOWER DENSITY)
 - RESIDENTIAL (MEDIUM DENSITY)
 - RESIDENTIAL (HIGHER DENSITY)
 - LOCAL CENTRE
 - SCHOOL SITE
 - INFORMAL & FORMAL OPEN SPACE
 - ALLOTMENTS
 - INDICATIVE FRONTAGE
 - FOCAL BUILDING
 - BUS ROUTE / PRIMARY STREET
 - BUS STOP
 - SQUARE / SPECIAL SURFACE TREATMENT
 - OTHER PRIMARY AND SECONDARY STREETS
 - LOCAL STREETS
 - PUBLIC RIGHT OF WAY (PROW)
 - FOOTWAY / FOOTPATH (INC. PROW DIVERSIONS)
 - FOOTWAY / CYCLEWAY
 - ACCESS POINT
 - EMERGENCY ACCESS
 - ROAD CLOSURE
 - NEW CROSSING
 - RETAINED HEDGEROW
 - RETAINED TREES
 - NEW PLANTING
 - DITCH / SWALE
 - EXISTING WATERCOURSE
 - DITCH / SWALE
 - INDICATIVE BALANCING PONDS
 - CHILDREN'S PLAY AREA
- LIMP: LOCAL EQUIPPED AREA OF PLAY
MEAP: MEDIUM-DENSITY EQUIPPED AREA OF PLAY
MSEA: MULTI-USE GAMER AREA





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Project **SOUTH OF CHELTENHAM**

Title **ILLUSTRATIVE MASTERPLAN**

Status	Drawn By	PM/Checked by
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Table 1 Leckhampton LGS Public Consultation Analysis and Common Ground Review

	LM	ON	LN	SH	R1	R2	R3	HB	NE	NW1	NW2	NW3	NN	WCG1	WCG2	LF	CF1	CF2	CF3	CF4	CF5	CF6	CF7	KL1	KL2	KL3		
Included as green space in JCS masterplan	yes	no	part	part	no	no	no	No	no	no	no	no	no	no	no	part	no	no	no	part	yes	yes	yes	yes	yes	yes		
Included in revised local green space	yes	no	yes	yes	yes	small part	no	yes	no	Note 6	Note 7	no	no	yes	no	yes	yes	yes	yes	yes	yes	yes	no	yes	yes	yes		
Omitted from revised local green space but should have been included						Note 5									Note 10													
Shown as green space in developers' plan	yes	no	little	little	no	no	part	Note 6	little	part	no	no	no	no	no	part	no	no	yes	part	yes	yes	yes	yes	yes	yes		
Disputed as LGS	no	Note 1	most	most	yes	small part	no		most	no	no	no	no	no	yes	no	yes	yes	yes	no	part	no	no	no	Note 13		no	
Disputed for other reasons	no		no	no	no	no	no	no	Note 7				no	Note 8				no	no	no	no	no	no	no	no	no	no	no
Taken out of LGS in Jan 2015 revision subject to strong constraints on development	n/a		n/a	n/a	n/a	n/a	Note 5		n/a	no	no	no	no	no	n/a	Note 11	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Has footpath(s) that are public rights of way	yes	no	no	yes	yes	no	no	no	no	no	no	no	no	yes	no	no	no	yes	no	yes	no	yes	no	Note 14	yes	Note 14		
Has footpath(s) or tracks that are not public rights of way	yes	no	no	yes	yes	no	no	no	yes	no	no	no	no	no	no	no	no	no	no	yes	no	yes	no	n/a	n/a	n/a		
Importance to the beauty and interest of the views from Leckhampton Hill	very high	high	very high	very high	very high	very high	med/high	high	medium	med./low	med./low	med./low	low	very high	very high	very high	high	very high	very high	very high	very high	very high	very high	med/high	med/high	high		
Importance to views of Leckhampton Hill and views across the Leckhampton Fields	very high	med/high	high	high	very high	high	med/high	Note 6	high	medium	very high	med/high	low	very high	very high	very high	Note 12	high	high	very high	low	very high	none	none	high	low		
Importance to the rural atmosphere	very high	medium	very high	very high	very high	very high	high	high	high	high	very high	high	medium	high	high	very high	med/high	very high	very high	very high	very high	very high	medium	very high	very high	very high		
Importance to the Leckhampton Fields network of footpaths and circular walk	very high	med/high	very high	very high	very high	high	high	Note 6	high	none	none	none	low	high	med/high	low	medium	very high	very high	very high	medium	very high	high	very high	very high	high		
Opportunity for exercise / easy all-year accessibility (including winter / flooding)	high	no	medium	very high	very high	med./low	no	no	high	none	none	none	none	high	med/high	medium	none	med/high	no	high	med./low	high	no	roads				
Tranquillity / trees / hedgerows	very high	high	high	high	very high	very high	high	high	medium	med./low	med./low	medium	medium	very high	very high	high	med/high	high	high	very high	very high	very high	medium	medium	medium	medium		
Use by dog walkers as open land for dogs to run free (off-path)	very high	no	no	no	high	no	no	no	no	no	no	no	no	medium / high		no	no	no	no	medium	no	low	n/a	roads				
Importance to Cheltenham Circular Footpath (as it crosses the Leckhampton Fields)	low	low	none	none	none	none	none	none	none	none	none	none	none	very high	very high	high	none	med/high	very high	very high	high	very high	none	none	med/high	med/high		
Additional information			Note 2	Note 3	Note 4	Note 5			Note 3					Note 9	Note 10			Note 12							Note 14			

Supplementary Information to the Map and Table

The document 'Analysis of the priorities for the Leckhampton Fields Local Green Space (LGS)' on 28 September 2015 (Annex A) provides the detailed information about the priorities for the LGS, as requested by Inspector Ord. The following notes provide supplementary information.

Several documents are referred to in these notes and these are attached as annexes to this document:

Annex A: CBC LGS toolkit checklist – Leckhampton Fields **(an LGS summary and some important maps, please see figures 2, 3, 4 & 5)**

Annex B: Cheltenham Borough Council letter of support for calling in 14/00838/FUL

Annex C: Cheltenham Borough Council letter of objections to 14/00838/FUL

Annex D: LWWH PC letter to Pegasus Planning Consultants 18 November 2015

Annex E: LWWH PC submission to 13/01605/OUT appeal 3 November 2015

Annex F: LWWH PC Proof of Evidence and Summary Proof of Evidence to 13/01605/OUT Appeal

Note 1

In revising the LGS in November 2014, the neighbourhood forum originally proposed to leave the Orchard/Nurseries site (area ON) within the LGS but to note that it might be possible to allow some development provided this was done with great care and sensitivity so that it looked like a rural hamlet. The land is close to the AONB and prominent as seen from Leckhampton Hill, but its impact on the view is somewhat mitigated because it is partly screened by the line of tall poplars along Kidnappers Lane and it is also surrounded by hedgerows that could screen development from the surrounding land to the west, south and east. We were advised by Gloucestershire Rural Communities Council (GRCC), acting on behalf of Cheltenham Borough planners, that rather than leaving Area ON in the revised LGS it was better to take this land out but subject to strong planning policies to ensure suitably sensitive development. At the time we understood that any development would involve just one developer, namely the consortium of Bovis Homes and Miller Homes that had included the Orchards/Nurseries site in their planning application 13/01605/OUT submitted in September 2013. Unfortunately, it has later transpired that Bovis Homes and Miller Homes only control part of Area ON. In their appeal against the rejection of their application by Cheltenham Borough Council, they removed from their application the rest of the ON land and 1.3 hectares of this (the L-shaped area in the middle of ON) is now the subject of a proposed application from Pegasus Planning Consultants for development of about 45 houses. Area ON actually comprises five separate areas and these could be the subject of applications for three or possibly even four separate developments. This could make it much more difficult to achieve sufficiently sympathetic development, and in retrospect the advice from GRCC to remove ON from the LGS was probably wrong. The Parish Council is now seeking through neighbourhood planning to work with Pegasus PC and hopefully also with Bovis Homes / Miller Homes to see if it possible to achieve a satisfactory plan for the site as a whole. The Parish Council's letter of 18 November 2015 to David Hutchison, Director of Pegasus PC, is attached at Annex D. David Hutchison replied on 01 December that he is now discussing the letter with the clients.

Note 2:

Area LN north of Lotts Meadow consists of two fields. The very narrow west field has important hedgerows and trees and a drainage ditch. It is intended to be left as green space in both the JCS

masterplan and developer's plan. The wider east field is used for hay and grazing cows. It is very important to the rural quality of the footpath along Moorend Stream: the footpath runs along the west side of the stream with the field to the west and is well screened from housing to the east by trees and hedgerows on the east side of the stream. Area LN is even more important for preserving the view from Leckhampton Hill by keeping the edge or urban Cheltenham sufficiently distant. Currently the urban edge is along the A46. This provides a good boundary. If development were allowed on the Northern Fields in Area NE, this would bring the urban edge 200 metres closer to the Hill, but the edge would still be screened and softened by the smallholdings (Area SH) so that the impact on the view from Leckhampton Hill could be mitigated. If development were permitted in Area LN, however, this would in itself bring the urban edge 500 metres closer to the Hill. Also, it would mean that Area ON could not be developed sensitively to look like a separate small rural hamlet but would clearly become part of the larger conurbation, bringing the urban edge 600 metres closer to the Hill. The impact on the view would be severe. Natural England in its objections to application 13/01605/OUT said: 'There are viewpoints of the highest sensitivity along the Escarpment of the Cotswold AONB, such as the Devil's Chimney. The view from the Devil's Chimney gives panoramic views across the Vale which would be interrupted by the proposed development. The scale of the potential development would significantly change the view from an open, rural expansive view to a predominantly urban view of the edge of Cheltenham'. As was discussed at the 13/01605/OUT Appeal Inquiry, to avoid this happening one needs to keep sufficiently large depth of rural foreground on the Leckhampton Fields.

Area LN is important to the fine view of Leckhampton Court and Leckhampton Hill from the smallholdings footpath. Also, if a footpath were opened up along the north side of LN it would afford good views of the Hill.

As shown in the Halcrow JCS flood risk assessment for Leckhampton at Figure 3 page 31 of Annex A, Area LN is the part of the Leckhampton Fields with the risk of flooding with all of Area LN lying in the 20 year flood zone.

Note 3:

Area SH comprises all of the smallholdings south of the footpath and a narrow strip of the smallholdings on the north side (with the remaining smallholdings being in Area NE). Area SH is very important to the Leckhampton Fields Circular Walk. All the long variants of the Circular Walk run along the smallholdings footpath. The narrow strip on the north side of the path is included in the LGS to soften the edge of any development as viewed from the footpath as well as providing the interest of the smallholdings themselves. Also, as explained in Note 2, Area SH is very important in providing screening and softening of the urban edge as viewed from Leckhampton Hill if development were allowed in Area NE.

The smallholdings contribute great rural charm and interest to the Leckhampton Fields and the Circular Walk, an important part of the varied topography noted by the Inspector in 1993. Area SH also includes a finger of green space at the east side of Area NE along the footpath by Moorend Stream. There is no dispute over this land because application 13/1605/OUT proposes that this would be green space where a balancing pond would be located. Like Area LN, this area is in the 20 year flood risk zone and in winter 2012 it flooded along Moorend Stream to a depth of around 0.3 metres.

Access to Areas SH and NE is via the public footpath and the track from the A46 shown in orange on the map. From the smallholding path one has a good view of most of the smallholdings on either side. There is access onto parts of NE and residents in adjacent housing in Warden Hill say that the fields were used as public open space in the past. The footpaths and access track are well surfaced and usable all year.

Note 4:

As is clear from the table, Robinswood Field (area R1) is extremely important to the LGS. Like Area LN, Robinswood Field is also crucial to protecting the view from Leckhampton Hill as explained in Note 2. Along with Lotts Meadow, it provides land where dog walkers can allow their dogs to run off lead, and it is particularly important for this in winter when Lotts Meadow and other areas become flooded. As can be seen from the Halcrow JCS flood risk assessment in Annex A, the eastern part of Lotts Meadow is in the 20 year flood risk zone. But, in fact, in winter most of Lotts Meadow commonly has surface water lying with interspersed areas of deeper flooding. Robinswood remains dry and the footpaths, like the footpath through the smallholdings, does not become muddy. This gives Robinswood a very high score for all year accessibility and opportunity for exercise. There are also excellent rural views in all directions and views of Leckhampton Hill with various foregrounds. To the north are the willows in the smallholdings, to the east the hedgerow and bank of trees along area LN, to the west the trees and orchards along Hatherley Brook, and to the north the orchard trees in ON.

Note 5:

In Annex 2 of the Neighbourhood Plan Concept submitted in August 2013, four options were put forward for the boundary of the LGS on the Northern Fields. The option actually proposed was Option 1, which included all of the Leckhampton Fields in the LGS. The revised LGS in January 2015 adopted Option 3, but with hindsight it would have been better to have adopted a mix of options 2 and 3. Option 2 included areas R2 and R3 in the LGS. It would have been better to have adopted option 3 for Area NE but option 2 for R2 and R3. R2 is prominent when viewed from Leckhampton Hill, as much in fact as R1.

Area R2 consists of a pair of fields. The southern field is open to Robinswood and appears to be managed along with Robinswood as a hay meadow. The north field is part of the smallholdings and is grazed by sheep. There is a tall hedge with hawthorn and damsons along the east side of the fields bordering the public footpath through Robinswood. This hedge continues round the south side of the southern field.

The approach adopted in the revised LGS was to include a border on the east and south sides of Area R2 to protect and thicken the hedgerow and to accommodate larger trees that in the long term could provide more screening and a better edge if the urban area included R2. However, the existing corridor of tall trees along Hatherley Brook in areas R3 and HB would provide a much better screen and urban boundary and the developers have confirmed that these trees will be retained in any development. It was also anticipated that the development on the northern part of Area ON could be kept sufficiently low and screened that, together with the part of Area R1 between areas ON and R2, this would provide sufficient visual separation between areas ON and R2 as seen from Leckhampton Hill in order to avoid ON appearing part of urban Cheltenham. However, for the reasons discussed in Note 1, this may be much harder to achieve than was anticipated. As with ON, the advice from GRCC that led to taking R2 and R3 out of the LGS was, with hindsight, probably wrong, at least in respect of the southern of the two fields. At the very least, strong policy constraints will be required on development on areas R2 and R3. The case for re-including at least the southern field of R2 in the LGS needs to be revisited when there is more clarity on how Area ON might be developed.

Note 6

Area HB is a strip of land along Hatherley Brook and was included in the revised LGS in order to provide a footpath route to the Leckhampton Fields for residents in Warden Hill. The present route

along the access track from the A46 through Area NE to the smallholdings footpath (shown in orange on the map) would be lost if there were development on Area NE.

A second purpose of Area HB is to protect the line of trees along Hatherley Brook, and the boundary of Area HB is somewhat convoluted in order to include and protect particular trees. There is no dispute over Area HB as the developers' masterplan proposes that balancing ponds will be located in this area and that the trees along Hatherley Brook will be retained. There is, however, one substantial issue of dispute. In the developer's masterplan there would be a road through HB connecting the areas of development on each side of Hatherley Brook. In the development proposal being pursued through the neighbourhood planning (assuming the appeal against rejection of 13/01605/OUT is refused), it is currently proposed that the developments on the northern fields east and west of Hatherley Brook (Areas NE and NW), would be separate and there would be no connecting road between them through Area HB. A major reason for this is that it preserves Area HB as a rural corridor as much as possible.

The footpath along Hatherley Brook in Area HB is important for providing residents in Warden Hill, The Park and Tivoli with good access to the Leckhampton Fields and footpath network and also thereby to the footpaths up Leckhampton Hill. It should be noted that there is a public footpath link north-west from the A46 at Woodlands Road to The Park (off the edge of the map).

As already stated in Note 5, the corridor of trees along Hatherley Brook is important to the view from Leckhampton Hill.

Note 7

The main reasons that Cheltenham Borough Council refused application 13/01605/OUT were on grounds of traffic congestion and damage to the landscape. One major landscape reason was the impact the proposed development would have on the view of Leckhampton Hill from the A46. The view from Area NW2, known as the 'Pig Field' and highlighted on the map by a viewpoint symbol, is particularly important as a 'gateway' view on the main road access route into Cheltenham from the south on the A46. Leckhampton with Warden Hill Parish Council as a Rule 6 participant in the Appeal Inquiry fully supported the Borough Council's objections and its concern about protecting this gateway view. Nevertheless the Parish Council did not include area NW2 in the revised LGS. There were two main reasons for this. First, a major purpose of LGS is recreational value and whilst it is true that Cheltenham as a town and the motorists driving in and out of Cheltenham on the A46 do greatly value this view, the value is not recreational; rather it is to do with the Cheltenham's image and setting and how people value their locality. Secondly, area NW2 makes little impact on the view from Leckhampton Hill compared with the impact of fields that are closer, such as areas LN, R1 and R2, as mentioned earlier.

Whilst area NW2 has been omitted from the LGS, the neighbourhood planning currently envisages that the cherished 'Pig Field View' could be preserved whilst allowing development on areas NE and NN and on most of area NW3.

Note 8

Areas WCG1, WCG2 and LF together comprise the area identified as SD2 or 'Land west of Farm Lane' in the Tewkesbury Borough Plan. Development is disputed on arguments over both green belt and Local Green Space. There is good merit in the case that this whole area should be made part of the greenbelt. These arguments have been put to the JCS Examination in Public by CPRE and by Ken Pollock.

Note 9, please also see the Additional Brief on White Cross Green (WCG1, WCG2), page 12

In the original LGS proposal put forward in August 2013, all of the SD2 area (WCG1 + WCG2 + LF) was included in the LGS. The main factors taken into account in revising the boundary in January 2015 were recreational and amenity value and the impact on the view from Leckhampton Hill. It was recognised that the fields west of Farm Lane were less well used by the public than the Leckhampton Fields within Cheltenham and this was borne out by the public consultation in January 2015. However the northern part, comprising WCG1 and part of WCG2 is well used both by walkers on the Cheltenham Circular Path and by residents in the housing estates to the north. This housing does not have any amenity area of its own and Area WCG1 and some part of Area WCG2 have served this purpose for decades.

In the revision, Area WCG1 was retained in the LGS, defined to encompass the route of the Cheltenham Circular Path and to provide amenity space broadly in accordance with government guidelines of 6 acres per 1000 population. Area WCG1 also preserves one of the ancient hedgerows and includes land to the west that is proposed for the balancing pond in application 14/00838/FUL and over which there is therefore no dispute.

There are currently very fine views of Leckhampton Hill from along the Cheltenham Circular Path. The excellence of these views has been highlighted by CPRE. The views would be largely lost if there were development on area WCG2, particularly on the west side because of the slope of the land. However, a fairly good view might be preserved from the higher land in the main triangular section on the east of WCG1 provided the development along the east side of WCG2 is done sympathetically with this in mind. Users of the Cheltenham Circular Footpath would have the freedom of the open area of WCG1 as they walk towards the pond with views of the Severn Vale and the Leckhampton Hill and the Cotswold Scarp, it would be a beautiful park area. The LGS as proposed therefore provides the double benefit of preserving the amenity land and hopefully also preserving something of the fine view of Leckhampton Hill. Also, the LGS triangle on the east side could also provide an impression of separation between the existing development to the north and any development on area WCG2 as viewed from Leckhampton Hill.

Note 10

As viewed from Leckhampton Hill, the development currently proposed in application 14/00838/FUL would cut a third of the way across the green belt corridor between Cheltenham and Gloucester. On a clear day, this view extends beyond the Black Mountains to hills out to a distance of around 65 miles. This is an important part of the panoramic view from Leckhampton Hill which is recognised as one of the most significant tourist views in Great Britain (Annex E, attached). The JCS Landscape and Visual Sensitivity and Urban Design Study in 2012 recommended there should be no development at all on the SD2 site or, at most, development only on the field at the north-east corner which would cut much less across the green belt corridor. This recommendation was disregarded by the JCS team.

A pragmatic approach was adopted in revising the LGS, bearing in mind that SD2 was included in the Tewkesbury Borough Plan and that TBC was very strongly committed to development there. The area LF provides a green buffer to reduce the effect on the AONB and on the view from Leckhampton Hill and very importantly to preserve the rural nature of Leckhampton Lane. Area LF was made identical to the green buffer included in the masterplan produced by the developers and the JCS team with the buffer widening on the west to reduce the amount that the development cuts across the green belt corridor. It would have been preferable to make the buffer wider on the west side and to include all of the SW field in the LGS. However, the decision was taken to limit Area LF to what the masterplan proposed. The masterplan collapsed when Redrow took over development of SD2. Currently there is no masterplan and this is one of the reasons that Cheltenham Borough

Council objected to application 14/00838/FUL and has also supported the request for this application to be called in by Secretary of State (see Annex B, p34). The lack of sufficient amenity land as recommended in Area WCG1 was another reason for Cheltenham Borough Council's objection to what Redrow and Tewkesbury Borough Council are proposing (Annex C, p36).

Note 11

In taking Area WCG2 out of the LGS the Parish Council and Leglag hoped that Cheltenham Borough Council, which was examining the LGS application on behalf of Tewkesbury Borough Council (TBC), would be able to prevail on TBC not only to accept the proposed LGS but also to insist that any development on WCG2 was suitably sympathetic to the site which is so close to the AONB and Leckhampton Hill. As shown in the masterplan, the original scheme proposed by the developers and the JCS team preserved the ancient hedgerows and included significant areas of green space as well as the LF buffer area LF. The scheme that Redrow has proposed of very high density suburban development is quite alien to the location.

Note 12

Formerly there was a good view of Leckhampton Hill across Area CF1. However, the hedgerow along Farm Lane has grown to a height where this is now obscured.

Area CF2 has a public footpath running east-west across the middle and this is part of the route of the Leckhampton Fields Circular Walk. The field is used for grazing horses and these are kept off the footpath by temporary electrified fence. The public only use the footpath and not any of the remainder of the field.

Area CF3 is a pig field that is prized by local people and also has good views across it of the trees along Hatherley Brook and Area CF6 beyond including the cottages of old Leckhampton. The Leckhampton Fields Circular Walk runs along two sides of the field and the Cheltenham Circular Footpath along the south side.

Area CF4 is a wild area of grass, wildflowers and blackberry bushes with the public footpath crossing it down to the bridge over Hatherley Brook. The area is open. It is one of the most beautiful parts of the Leckhampton Fields with the trees along Hatherley Brook, the orchard of Area CF5 to the south with Leckhampton Hill beyond.

Area CF5 is an old orchard of perry pears, most of which are protected by tree preservation orders.

Area CF6, east of Hatherley Brook, is all included as green space in the masterplan.

Area CF7 is shown on the JCS masterplan as green space. In fact it is houses and gardens, and a small nursery. Because of this it has not been included in the LGS. Nevertheless, the Parish Council agrees with the JCS masterplan that this area should be protected as it is.

Note 13

All of Kidnappers Lane is included within the LGS to preserve the Lane's rural character. Sections KL1 and KL2 form parts of the footpath network. KL2 has a wide grass verge on the west side and is part of the Leckhampton Fields Circular Walk. It is very important that there should be no exit from site ON into KL2. In the concept for development being pursued through neighbourhood planning, development on Area ON would only exit at the SE corner of ON onto section KL3.

Sections KL1 and KL2 include the adjacent hedgerows. Protecting these hedgerows is very important to the rural aspect of Kidnappers Lane and the view from Leckhampton Hill. Application 13/01605/OUT proposes protecting these hedgerows and the rural character of Kidnappers Lane. So there is no dispute about the need for protection.

Note 14

As noted above, road section KL2 has a broad grass verge and on its west side the footpath along this is a key part of the Leckhampton Fields Circular Walk. The road sections KL1 and KL2 do not have any footpath. KL1 is reasonably safe for walking along because KL1 is straight with good visibility and vehicles have to slow down at the sharp bends at either end. Together with the footpath along the east side of Farm Lane, it forms part of the extended footpath network. Section KL3 is less safe because it is narrow and curves, making visibility poorer. It does not form part of the footpath network.

Additional Brief on White Cross Green (WCG1, WCG2)

Inspector Travers in her report on the TBC Local plan to 2011 kindly provides an independent view of this area; *'the site consists of four fields subdivided by substantial hedgerows that are interspersed with hedgerow trees. It has a gently rolling, topography and an attractive pastoral character that in my view links strongly into the landscape of the AONB immediately to the south of Leckhampton Lane'* - PINSM/G1630/429/5 Dec. 2003, para 2.25.11. As the Inspector recognised, the White Cross fields are highly visible from within the AONB and especially so from higher up at the Devil's Chimney and along the Cotswold Scarp, noting that inappropriate development here would damage the view from Leckhampton Hill to an extent that, *'the visual impact on the surrounding countryside would be very significant and that it could not be easily mitigated'* - 2.25.12, Inspector Travers statements on White Cross /SH1 have been provided in the submitted JCS evidence. In conclusion the Inspector states, *'I do not consider that there are any differences in character or appearance between the Cheltenham Borough safeguarded land and the SH1 site that are so significant as to render this incursion less harmful'*. Given the longstanding evidence supporting the landscape and amenity value of WCG, together with the artificial boundaries created on the 2015 LGS map, any landscape amenity assessment of these fields should address WCG1, WCG2 and LF as a unified whole.

WCG is attractive open meadowland, containing a number of ancient hedgerows, and set against the AONB backdrop of Leckhampton and Shurdington Hills. It has been grazed by sheep and cattle over many years. A huge buttercup meadow in spring and hay bales in late summer adds to its undoubted beauty. The fields and hedgerows are a haven for wildlife, e.g. foxes and deer, together with birds of many species including the redlisted Sky Larks and Starlings, and Sparrow Hawks, Woodpeckers and migrating Redwings in winter; a solitary barn owl has been seen systematically hunting within WCG for small mammals, such as voles and mice, at dusk during Nov 2015, this is testament to the quality of the habitat after so much destruction with the current archaeological work.

The Cheltenham Circular Footpath (CCF), which traverses WCG1, is a recognised recreational footpath and its value within the landscape warrants maximum protection. The CCF is used by walkers, with and without dogs, joggers, families and children for informal games, building dens in the hedgerows and enjoying the rich wildlife. The value for recreation was evidenced by the White Cross Town and Village Green application in 2011 which scored maximum marks in all four criteria and was well supported by the community. More recently Tewkesbury Borough Council received over 400 LGS cards of support for WCG1 as part of the consultation on the REDROW proposals.

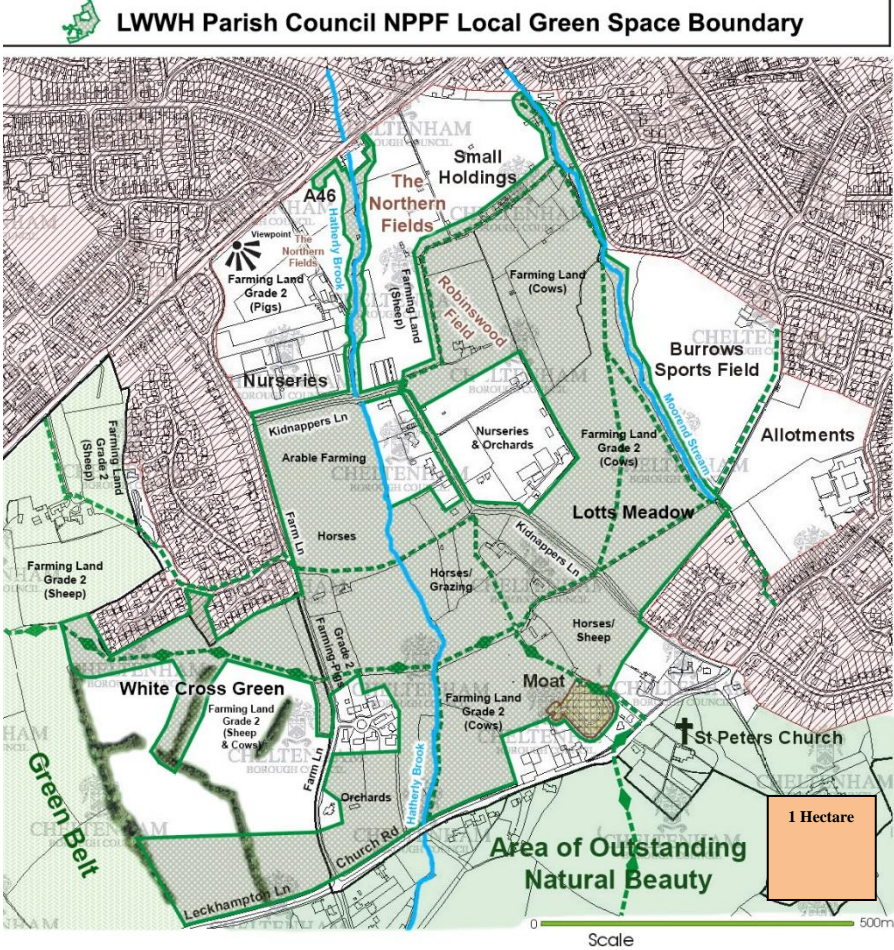
Many users access WCG1 from Farm Lane, whilst others enter from the A46. For many of these Shurdington/Hatherley users, this special land lies in close proximity to their homes, although details of their usage have not been fully captured in the Parish Council LGS consultation. Walkers on this section of the CCF enjoy some of the finest views of Leckhampton Hill, particularly in evening sunlight, and excellent views across the Severn Vale towards the hills of the Forest of Dean and Herefordshire. Many walkers, particularly those with dogs, deviate from the CCF and wander round all fields within WCG to take in the full landscape value of this special location.


It is not surprising that Inspector Travers and the CPRE focussed on the landscape value of WCG/SD2, including the importance of the views to and from the AONB, nor that the LGS Concept plan included ALL these fields in the LGS outlined in 2013, as ALL these fields have a very high landscape value. The area of White Cross was considered the *'best candidate for additional greenbelt'* by AMEC in their JCS greenbelt review covering all three districts of Cheltenham, Tewkesbury and Gloucester.

WCG1 (CBC CP107) is the absolute priority area which should be included in the LGS, it is the only Local Area of Play (LAP) requested in the revised Leckhampton LGS. It is fully justifiable on landscape and usage grounds and supported by an argument based on the long standing *NPPA Six Acre Standard*, the important provision of outdoor recreational/play space per thousand residents. This LAP is strongly supported by Sports England in their objection letter to the REDROW proposals and is consistent with the NPPF ^[para 52] on urban extensions to be based on the principles of garden cities. The Sports England objection centred on the fact that no provision is made for sport on the site, they went on to state the NPPF requirement ^[para 70], *'to ensure that new sports facilities are planned and provided in a positive and integrated way'*, this was also referenced in the objection letter from the Cotswold Conservation Board. The recent archaeological investigations on White Cross have found two Iron Age Round Houses on WCG1 and roman remains, this is an exciting find and gives the grand opportunity to make this a feature in public open space. Ideally, within WCG1 the Cheltenham Circular Footpath needs the protection of a much larger LGS so as to maintain the feeling of openness and to protect the spectacular views of Leckhampton Hill and across the Severn Vale to the west. Finally, the WCG1 LGS would provide a vital shared green space between existing and any new development to promote community integration and a safe area of play for under 11's away from the busy Leckhampton Lane.

WCG2 is currently (i.e. post 2013) not included in LGS designation, but the strength of available evidence set out here suggests that it could be reconsidered for LGS designation, at least in part. If this is not possible then WCG2 should be formally identified as land of very high sensitivity, a view supportable by reference to Inspector Travers, CPRE and Natural England.

Annex A: CBC LGS toolkit checklist – Leckhampton Fields

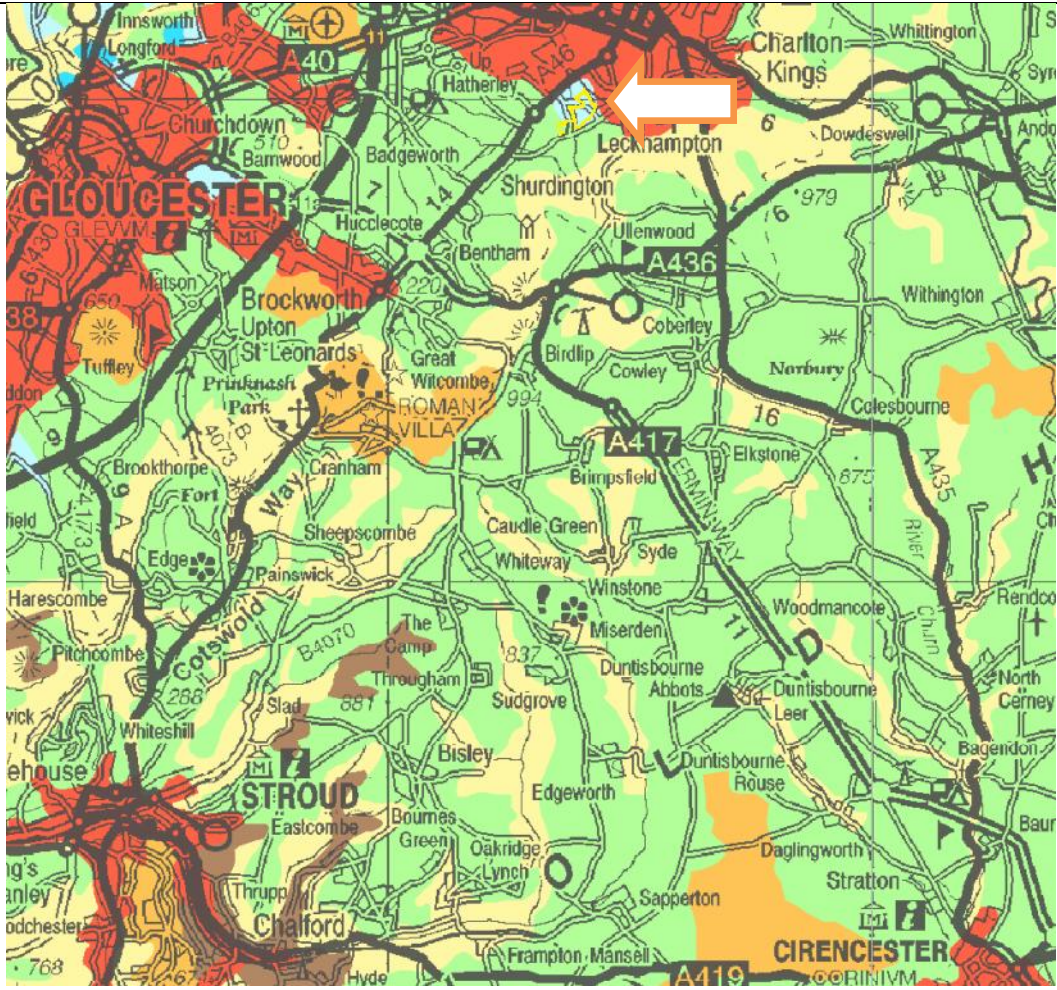
1	General Information	Tick if relevant evidence provided
1.1	<p>Name and address of site <i>Some sites have several names and all known names should be given</i></p>	
	<p>Leckhampton Fields The site is located in Leckhampton between the A46 (Shurdington Road) in the northwest and Church Road / Leckhampton Lane in the southeast. The field area is bounded as follows: On the northwest side by the A46 (Shurdington Road), on the north by the course of the old railway line, on the east side by Moorend Stream and the south-east boundary of Lotts Meadow. On the south side by the boundaries of properties along the north side of Church Road and Leckhampton Lane. On the west side by the west boundary of White Cross Green fields, the southern boundary of the Lanes Estate and along Farm Lane and Kidnappers Lane to the A46. Some areas have well known names, for example Lotts Meadow, Robinswood and White Cross. The Leckhampton fields is a generic name for the area with the high density of footpaths shown in Section 1.2 below.</p>	
1.2	<p>Site location plan <i>The plan can be at any scale, but must show the location and boundaries of the site. Please indicate the scale.</i></p>	
	 <p>The map, titled 'LWWH Parish Council NPPF Local Green Space Boundary', shows the Leckhampton Fields area. Key features include: <ul style="list-style-type: none"> Boundaries: A46 (Shurdington Road) to the northwest, Church Road and Leckhampton Lane to the southeast, and the Green Belt to the southwest. Internal Features: Moorend Stream, Lotts Meadow, White Cross Green, and various farming areas (e.g., Robinswood, Burrows Sports Field, Allotments). Infrastructure: A railway line to the north, and roads like Kidnappers Ln, Farm Ln, and Church Rd. Other Landmarks: St. Peter's Church and an 'Area of Outstanding Natural Beauty'. Scale: A scale bar at the bottom indicates 0 to 500 meters. A 1 Hectare area is marked with an orange square. </p>	
	<p>Figure 1 LWWH Parish Council LGS Boundary, a higher A3 resolution map is available on request</p>	

	(Please note- the actual map is high resolution as provided in the IACS and can be viewed at high magnification).	
1.3	<p>Organisation or individual proposing site for designation <i>This will normally be a Town or Parish Council or a recognised community group</i></p>	
	Leckhampton with Warden Hill Parish Council and supported by Shurdington Parish Council.	
1.4	<p>Ownership of site if known <i>Information on land ownership can be obtained from the Land Registry. Some land parcels are not registered however local people may know the owner.</i></p>	
	<p>This Map which was prepared for the White Cross Town & Village Green application and provides the majority of the ownership details, zoom in to view the map detail.</p> <p>(Ownership shown- in the map: Gloucester Diocesan, Gloucestershire County Council, Edwina Wiggins, Ian Ansell, M. A Holdings Ltd)</p> 	
1.5	<p>Is the owner of the site aware of the potential designation? Do they support the designation? (Sites may be designated as Local Green Spaces, even if there are objections from the site owners)</p>	
	Some of the owners will be aware, we will try to contact the owners, provide evidence and request support for our LGS application.	
1.6	<p>Photographs of site</p>	
	These are all provided separately in our application, Appendices 4 to 9 below.	
1.7	<p>Community served by the potential Local Green Space <i>i.e. does the site serve the whole village/town or a particular geographic area or group of people?</i></p>	
	This area of Leckhampton serves the whole town, the concept is a Cheltenham Country Park which was well supported in our petition detailed in appendix 2 below.	

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

	<p>It is possible that the Inspector at EiP will call for changes in the plan, the housing numbers and sites for Cheltenham have been challenged by the C5 Parish Councils and other organisations. It is hoped that the NPPF LGS application for Leckhampton will be considered on merit and the evidence presented, as the original LGS application of August 2013 predates the JCS submission.</p> <p>At the time the Parish Council LGS application was submitted in August 2013, there was no planning application for development on any of the land. The land was <u>under consideration</u> for inclusion in the Joint Core Strategy as a strategic development site. The land in Cheltenham Borough is not allocated for development in the current Cheltenham Plan. Part of the land in Shurdington Borough is identified in the Tewkesbury Plan as being potentially suitable for development subject to the development being sustainable. An application to build on the land was rejected at appeal by the planning inspectorate in 2009 on grounds that development on the site was not sustainable because it would be isolated from the urban area; this was also the view of the Government Office South West.</p>											
3	Size, scale and “local nature” of proposed Local Green Space											
3.1	Area of proposed site											
	<p>The area of the LGS is defined on the Map given in Figure 1 of the IACS – see Section 1.2.</p> <p>The LGS Boundary has been downsized and re-appraised to identify where development at a level appropriate to a strategic site might cause the least harm to the landscape and amenity value. The findings from this re-appraisal are set out in Appendix 1, the map of figure 1 has a marked scale and the key shows 1 hectare for reference.</p> <p>Approximate Leckhampton LGS Areas, totalling 43 Hectares:</p> <table> <tr> <td>Lotts Meadow</td> <td>10Ha</td> </tr> <tr> <td>Robinswood Fields</td> <td>7 Ha</td> </tr> <tr> <td>Central Fields</td> <td>18 Ha</td> </tr> <tr> <td>White Cross</td> <td>4 Ha</td> </tr> <tr> <td>ANOB Buffer</td> <td>4 Ha</td> </tr> </table> <p>(south of White Cross)</p>	Lotts Meadow	10Ha	Robinswood Fields	7 Ha	Central Fields	18 Ha	White Cross	4 Ha	ANOB Buffer	4 Ha	
Lotts Meadow	10Ha											
Robinswood Fields	7 Ha											
Central Fields	18 Ha											
White Cross	4 Ha											
ANOB Buffer	4 Ha											
3.2	<p>Is the site an “extensive tract of land”? <i>(Extensive tracts of land cannot be designated as Local Green Space)</i> <i>e.g. how large is it in comparison to other fields; groups of fields; areas of land in the vicinity etc.? Does the site “feel” extensive or more local in scale?</i></p>											
	<p>Cheltenham’s MP, Martin Horwood, has provided some important guidance to the council on what the NPPF defines as an ‘<i>extensive tract of land</i>’ (para 77), the ministerial view is that the LGS fall into the same category as those designated as Sites of Special Scientific Interest, the example being given of Charlton Kings Common.</p> <p>There are 143 SSSI’s in Gloucestershire and that two of the nearest are (1) Leckhampton Hill & Charlton Kings Common and (2) Crickley Hill & Barrow Wake which cover 63ha and 55ha respectively.</p>											

	<p>This area of land is local to the village of Leckhampton, the first settlement in this area of Gloucestershire and has been protected for many generations. Importantly this area is very accessible and close to the urban areas that it serves. The LGS is local to Leckhampton but enjoyed by residents of other wards in the town, there is no other area in Cheltenham that provided the same density of footpaths with such an attractive rural character^[1 & 2] and tranquillity.</p> <p>The site serves the Cheltenham community on all four sides, please see the map of figure 1. To the northwest it serves residents in Warden Hill, with the existing footpath and the new proposed link to Woodlands Road and along the Shurdington Road. They mainly use the access track from the A46 to the Leckhampton Fields Circular Path and thence to Robinswood Field or to Lotts Meadow, or round the Circular Walk.</p> <p>To the north and north-east it serves residents in Leckhampton who access the land either by the footpath from the A46 along Moorend Stream, or from several roads adjacent to Moorend Stream, or from Burrows Field, which has the car park that is used by people coming from further afield.</p> <p>From the east it serves residents in Leckhampton Village and to the east of that along Leckhampton Road, Pilley and Old Bath Road, who access the site via the footpath from Church Road along Moorend Stream, via Kidnappers Lane, via th footpath (Cheltenham Circular Path) from St Peters Church carpark past the Medieval moat,</p> <p>To the south, it serves residents along Church Road and Leckhampton Lane and to the west it serves residents along Farm Lane and the north end of Kidnappers Lane and residents in the Lanes Estate. The network of footpaths on the land also connects to footpaths up Leckhampton Hill.</p> <p>The National Planning Policy Framework para 52 is helpful in providing guidance on potential urban extensions. <i>'The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development.'</i></p> <p>The Leckhampton LGS application provides just such an opportunity, and is very well supported by the community.</p>	
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The LGS boundary is outlined above in yellow on the DEFRA South West Region 1:250000 Series Agricultural Land Classification map, the LGS is local the village of Leckhampton but serves the whole town being so well connected to the urban area. This map also shows the rarity of high quality agricultural land in Gloucestershire, perhaps this explains why this area has been protected for over 30 generations, **please consider the synergy between this LGS application, future food production and the proximity to the UoG Park Campus for agricultural research.**

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

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

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

	Letter from MP Martin Horwood – Appendix 11	
6.4	Evidence of support from other groups <i>e.g. letters of support from organisations such as Campaign to Protect Rural England; local amenity societies; local schools etc.</i>	
	Requests for support have been made and will be provided separately.	
7	Evidence to show that the green area “holds a particular local significance, for example because of its <u>beauty</u>,” (if applicable) <i>Please indicate what evidence you have provided against each point.</i>	
7.1	Is this criteria relevant to this site ?	
	YES evidence is provided ^[1 & 2]	
7.2	Describe why the community feels that the site has a particular local significance for its beauty.	
	<p>The public petitions submitted to protect the land have over 2000 signatories in one case and over 1000 in the other, and these were only partial consultations. So there is no doubt that local people believe the land is very special. It has great charm and beauty with many fine views. The appendices 5 to 9 show photographic evidence of this and of the walks and field that people use.</p> <p>Reference 2 provides a detailed landscape and visual appraisal by Landscape Design Associates commissioned by Cheltenham Borough Council. They are integral to the character of Leckhampton and to what makes South Cheltenham an asset to the town and a wonderful location for a country park.</p> <p>The fields also have great landscape importance to the nationally famous views from Leckhampton Hill and also from Charlton King Common. Leckhampton Hill is one of the great assets of Cheltenham, which along with the architecture and the many trees adds much to Cheltenham’s reputation and quality of life. Evidence from the photographic assessment of the impact of development on the view from Leckhampton Hill and from the Cotswold Way National Trail is attached at appendix 4.</p> <p>Question 4 in the public consultation questionnaire at Appendix 3 list many of the noteworthy features and 89% of respondents valued Leckhampton Fields for the views of Leckhampton Hill and 84% valued the views across the fields, 1491 people participated in this survey in January 2015, a very high percentage of residents given the short 10 day consultation period.</p> <p>Information is provided in Reference 1- ‘Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013 – Section 3.4.3 – Landscape and visual impact of large scale development in Leckhampton and Shurdington.</p>	
7.3	Site visibility <i>e.g. is it easy to see the site from a public place? Are there long-distance views of the site? Are there views of the site from any key locations?</i>	

	<p>Please reference the Land at Farm Lane, Church Road, Leckhampton, Cheltenham, Landscape and Visual Appraisal, Final Report, Landscape Design Associates – July 2003 (Reference 2)</p> <p>Joint Core Strategy Site Assessment/Capacity Testing, Final Report AMEC Environment & Infrastructure UK Limited October 2012 (Reference 3)</p>	
7.4	<p>Is the site covered by any landscape or similar designations? <i>e.g. Area of Outstanding Natural Beauty; Conservation Area; Special Landscape Area</i> Further information – Cheltenham Borough Council; Natural England;</p>	
	<p>The LGS borders the Greenbelt to the south west and the AONB to the south.</p>	
7.5	<p>Is the site (or the type of site) specifically mentioned in any relevant landscape character assessments or similar documents? <i>e.g. Cotswolds AONB landscape character assessment. Further information – Cheltenham Borough Council; Natural England; Cotswolds Conservation Board</i></p>	
	<p>Yes See reference 2 - Land at Farm Lane, Church Road, Leckhampton, Cheltenham, Landscape and Visual Appraisal, Final Report, Landscape Design Associates – July 2003</p> <p>See Reference 1 - Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013 – Section 3.4.4 - Previous Inspectors Reports & Enquiries</p>	
7.6	<p>Does the site contribute to the setting of a historic building or other special feature?</p>	
	<p>Yes- See reference - Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013 – Section 3.1</p>	
7.7	<p>Is the site highlighted in literature or art? <i>e.g. is the site mentioned in a well-known poem or shown in a famous painting?</i></p>	
	<p>The Rev.Charles Dodgson, alias Lewis Carroll, wrote two of the most enduring classics of children’s fiction which have a strong connection to Leckhampton. In a visit to Cheltenham in April 1963, Dodgson took the three Liddell girls, Alice, Lorina and Edith for walks on Leckhampton Hill. Looking down across the Severn Vale, the countryside of Gloucestershire must have seemed, as Dodgson described Wonderland, "Marked out just like a giant chess board". Historians conclude that this view across Leckhampton and the Severn Vale was one of the inspirations for Alice in Wonderland, published in 1865, and Alice’s adventures on that holiday in Cheltenham, followed six years later by Alice Through the Looking Glass.</p> <p>There is a reference to the poet James Elroy Flecker in the History of Cheltenham, he refers to the beauty of the '<i>Leckhampton Lanes</i>' in one of his poems, and in 'November Eves' makes mention of Leckhampton Hill.</p>	
8	<p>Evidence to show that the green area “holds a particular local significance for example because of its <u>historic significance</u>” (if applicable) <i>Please indicate what evidence you have provided against each point.</i></p>	

8.1	Is this criteria relevant to this site ?	
	YES - See Reference 1 - Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013 – Section 3.1	
8.2	Are there any historic buildings or remains on the site? <i>e.g. listed buildings; scheduled ancient monuments ; registered parks and gardens; war memorials; other historic remains or structures.</i> <i>Further information – Cheltenham Borough Council; English Heritage; Gloucestershire Historic Environment Record; Gloucestershire Archives; local history society;</i>	
	<p>There is one ancient monument – the moat of a medieval manor. There are three cottages within the LGS that are listed buildings. The oldest is Moat Cottage which dates from the 16th century. This is pictured on the front cover of Reference 1- Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013.</p> <p>Along the Leckhampton Fields Circular Walk are Leckhampton Manor and St Peter’s Church, both of which date from about 1315, although St Peters has some Saxon footings having been built on the site of an earlier church.</p> <p>In the January 2015 survey of Leckhampton Fields, completed by 1491 people (Appendix 3), 34% of respondents valued the mediaeval moat and 39% the mediaeval cottages in Leckhampton Fields.</p>	
8.3	Are there any important historic landscape features on the site? <i>e.g. old hedgerows; ancient trees; historic ponds or historic garden features</i> <i>Further information – Cheltenham Borough Council; English Heritage; Gloucestershire Historic Environment Record; local history society</i>	
	<p>There are many ancient hedgerows and trees within the site See Reference 1 - Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013 – Section 3.1 The History of Leckhampton, 3.1.1 The Fields beneath and 3.2 Leckhampton Ecology, Wildlife and Habitat.</p> <p>See also Reference 2 Land at Farm Lane, Church Road, Leckhampton, Cheltenham, Landscape and Visual Appraisal, Final Report, Landscape Design Associates – July 2003</p>	
8.4	Did the site play an important role in the historic development of the village or town? <i>e.g. the old site of the town railway station; the old garden for the manor house etc.</i>	
	Leckhampton Village and Leckhampton Court predates Cheltenham and was one of the first settlements in this area, this is due to the fertility of the soil, drought resistance and water supply from Leckhampton Hill, please reference figures 3, 4 and 5 - IACS Maps below.	
8.5	Did any important historic events take place on the site?	
	Not Known	

8.6	Do any historic rituals take place on the site? <i>e.g. well-dressing; maypole dancing etc.</i>	
	Not Known.	
9	Evidence to show that the green area “holds a particular local significance, for example because of its <u>recreational value</u> (including as a playing field)”, (if applicable) <i>Please indicate what evidence you have provided against each point.</i>	
9.1	Is this criteria relevant to this site ?	
	YES	
9.2	Is the site used for playing sport? <i>If so what sport? How long has it been used for sports provision? Is this sports provision free or is a club membership required?</i> <i>Further information – Sport England</i>	
	The area of Lotts Meadow and White Cross has been used for informal sports and general recreation. The area of White Cross has been requested for an amenity area and will hopefully provide an amenity for ball games etc.	
9.3	Are the public able to physically access the site? <i>e.g. are there any public rights of way across the site? Or adjacent to the site? Has access been allowed on a discretionary basis? Is there public access to the whole site or only part? Is there good disabled access to the site? (A site can still be designated even if there is no public access.)</i> <i>Further information – Gloucestershire County Council</i>	
	Yes, please refer to the LGS Map, figure 1 of the IACS (Section 1.2 above). This map shows the main Leckhampton footpath and the high density of footpaths providing access to all parts of the LGS from the surrounding urban areas. This is one of the compelling advantages to this LGS site, it provides green space where it is most valued, close to the large urban areas that it serves. Appendix 5 contains a description of footpaths and walks. In the January 2015 survey, completed by 1491 people, 774 completed forms (Appendix 3) 84% of respondents use KL/FL/CR triangle, 70% use Lott’s Meadow, 63% the paths in smallholdings, 59% Moorend Stream Path, 41% White Cross and 52% the circular walk. (Appendix 3)	
9.4	Is the site used by the local community for informal recreation? And since when? <i>e.g. dog walking; sledging; ball games etc</i>	
	Yes, for many generations. The petition in 2011 attracted 2,000 signatures agreeing that people ‘... highly value easy accessibility for informal recreation.....’ in Leckhampton fields The footpaths and fields accessible to the public are heavily used for walking and dog walking. The public consultation on the proposal in January 2015 has asked residents to say how and how often they use the land and the survey results from 1491 respondents	

	<p>show that 31% of respondents use the fields/paths daily or almost daily, while 37% use them a few times per week or many times per month.</p> <p>84% of respondents valued the Leckhampton Fields for the opportunity to exercise.</p> <p>86% of respondents use the fields for walking, 35% for dog walking, 22% for running/jogging. 44% of respondents use the fields with children and 13% for playing games. (Appendix 3)</p>	
10	Evidence to show that the green area “holds a particular local significance, for example because of its <u>tranquillity</u>” (if applicable) <i>Please indicate what evidence you have provided against each point.</i>	
10.1	Is this criteria relevant to this site ?	
	YES	
10.2	Do you consider the site to be tranquil? <i>e.g. are there any roads or busy areas close by?</i>	
	Yes, please refer to references 1 and 2, The public consultation survey in January 2015, completed by 1491 people (Appendix 3) showed that 82% of respondents particularly valued the rural atmosphere of Leckhampton Fields and 76% valued the tranquillity offered.	
10.3	Is the site within a recognised tranquil area? <i>e.g. within the Campaign to Protect Rural England's tranquillity maps</i>	
	Have requested CPRE to advice and comment on the Leckhampton LGS application in connection with their tranquillity maps.	
11	Evidence to show that the green area “holds a particular local significance, for example because of the <u>richness of its wildlife</u>”; (if applicable) <i>Please indicate what evidence you have provided against each point.</i>	
11.1	Is this criteria relevant to this site ?	
	YES	
11.2	Is the site formally designated for its wildlife value? <i>e.g. as a site of special scientific interest; a key wildlife site etc</i> <i>Further information - Natural England; Gloucestershire Centre for Environmental Records</i>	
	See Reference 1 - Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013, Section 3.2 Leckhampton Ecology, Wildlife and Habitat	
11.3	Are any important habitats or species found on the site? <i>e.g. habitats and species listed in the UK priority habitats and species lists or Gloucestershire Biodiversity Action Plans or protected species or on the red/amber lists of birds of conservation concern.</i> <i>Further information - Natural England; Gloucestershire Centre for Environmental Records; National Biodiversity Network; RSPB</i>	

	<p>See 11.2 and Reference 1 - Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013, Sections 3.2 Leckhampton Ecology and 3.3 The Natural Environment.</p> <p>See Appendix 10 - The Leckhampton Environmental Report, 10 Year Bird Survey by Tony Meredith which shows the LGS is habitat for more than 45 species, of which 17 are red or amber listed, which is a testament to its importance and need for protection.</p>	
11.4	<p>What other wildlife of interest has been found on the site? <i>Further information - Natural England; Gloucestershire Centre for Environmental Records; National Biodiversity Network;</i></p>	
	<p>Please See Reference 1 - Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013, Sections 3.2 Leckhampton Ecology and 3.3 The Natural Environment.</p> <p>The petition in 2011 attracted 2,000 signatures agreeing that people ‘... highly value..., wildlife, environmental and ecological interest.’ in Leckhampton Fields.</p> <p>The public consultation survey in January 2015, completed by 1491 people (Appendix 3) showed that 62% of respondents valued the wildflowers, 75% the trees, 57% the hedgerows, 50% the wilderness area, 69% the birds, 58% the wild animals. 56% valued the streams and 36% valued the ponds.</p>	
11.5	<p>Is the site part of a long term study of wildlife by members of the local community? <i>e.g. long-term monitoring of breeding birds.</i></p>	
	<p>It’s certainly used by many in the community for viewing wildlife, long term with the bird surveys. See Q 11.4 above and Appendix 10. The ancient hedgerows and two water courses are DEFRA protected habitats and are both rich in wildlife, the university has completed some ecology work in Leckhampton, and we will seek further advice on this question.</p> <p>The Perry Orchard to the south, on the corner of Farm Lane and Church Road has recently been awarded TPO status, this is extremely important to protect the habitat, more details can be provided if required.</p> <p>Hedgerows, traditional orchards and water courses are listed as Priority Habitats under the UK Biodiversity Action Plan (BAP) and the preservation of these habitats within the site is therefore promoted.</p>	
12	<p>Evidence to show that the green area “holds a particular local significance, for <u>any other reason</u>”; (if applicable) <i>Please indicate what evidence you have provided against each point.</i></p>	
12.1	<p>Is this criteria relevant to this site ?</p>	
	<p>YES</p>	
12.2	<p>Are there any other reasons why the site has a particular local significance for the local community?</p>	
	<p>Leckhampton Village and the surrounding land is of course mentioned in the in the</p>	

	<p>doomsday book of 1086 the settlement was divided among three landowners and recorded as Lechameton, meaning ‘homestead where garlic or leeks were grown’. although a reinterpretation may point to general vegetables.</p> <p>Please see references [1] and [2] for the complete answer to this open question.</p> <p>Appendices 2 and 3 have details of petitions and surveys that provide evidence and demonstrate how much the Leckhampton Fields are valued by local people</p>	
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REFERENCES

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

Sections below

Maps

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

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

[Figure 4 DEFRA Agricultural Land Classification, DEFRA website – Leckhampton](#)

[Figure 5 MAFF Agricultural Land Classification – Leckhampton](#)

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

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

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

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

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

[Appendix 6 – The Smallholdings](#)

[Appendix 7 - Robinswood Field](#)

[Appendix 8](#) – Lotts Meadow

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

[Appendix 10](#): Leckhampton Environmental Report

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

LECKHAMPTON MAPS

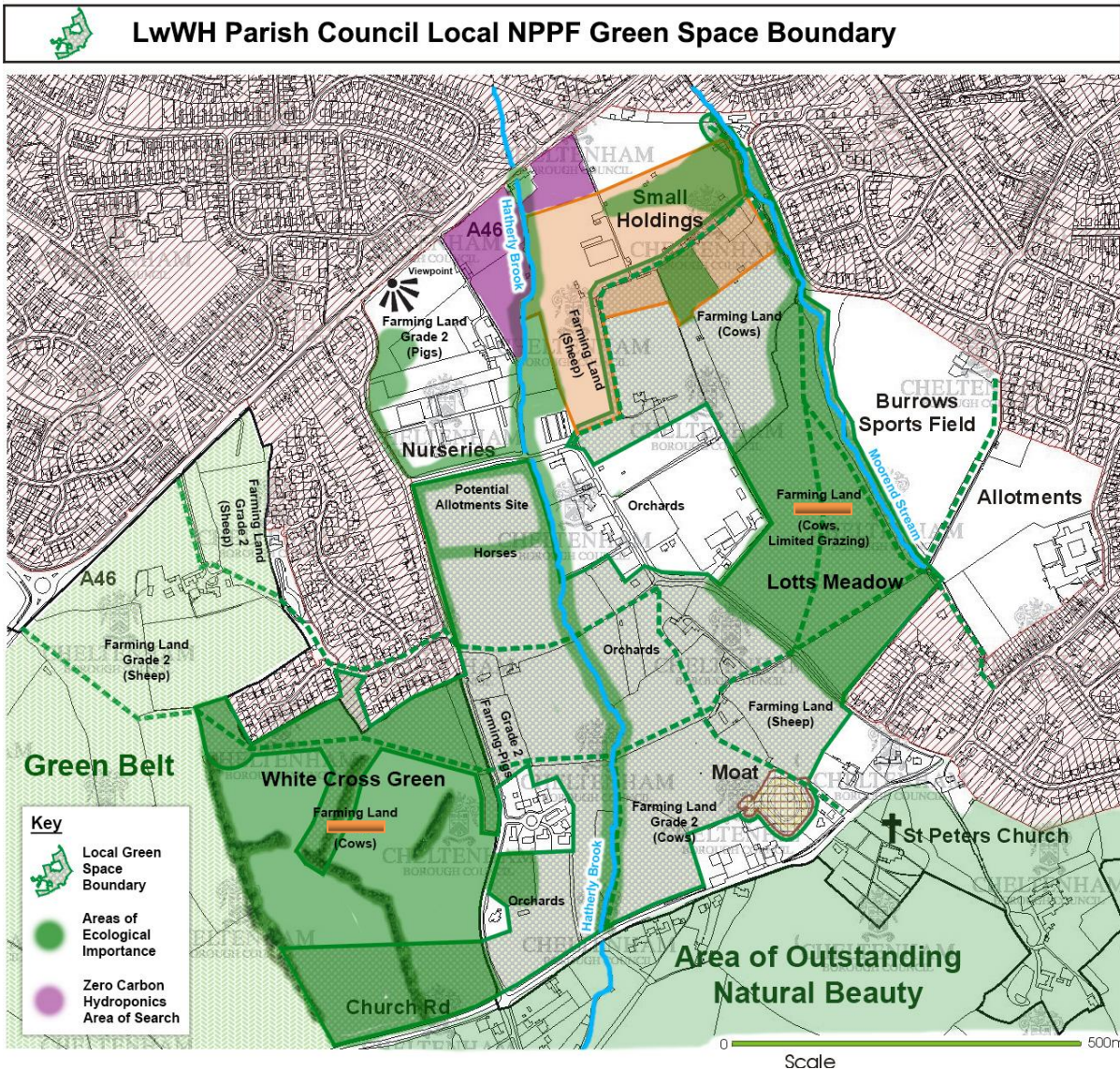


Figure 2 Leckhampton Ecology Map, Extract from Leckhampton with Warden Hill (LWWH) and Shurdington Parish Council Neighbourhood Concept Plan and Local Green Space application, August 2013

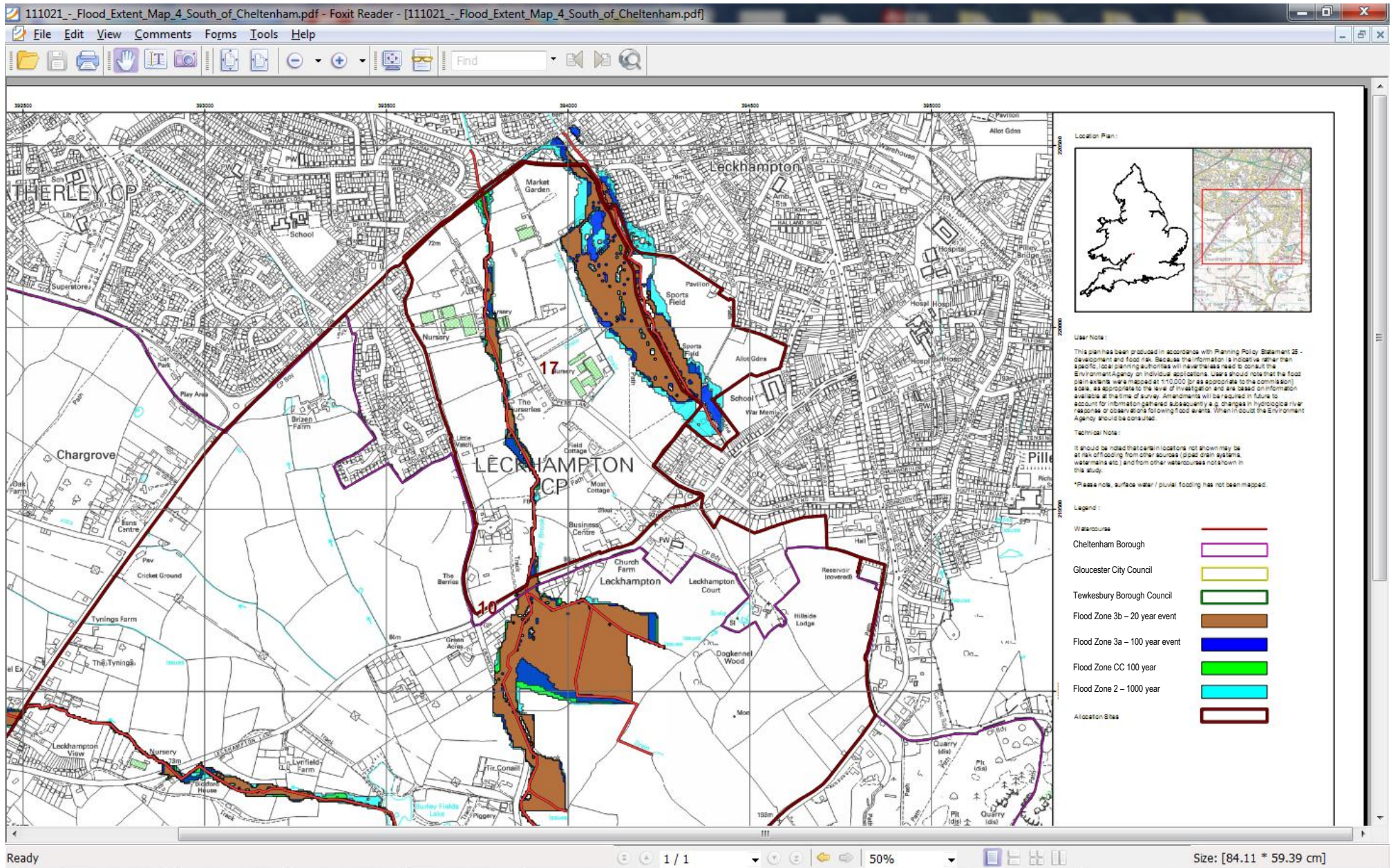


Figure 3 Halcrow JCS Flood Risk Assessment – Leckhampton

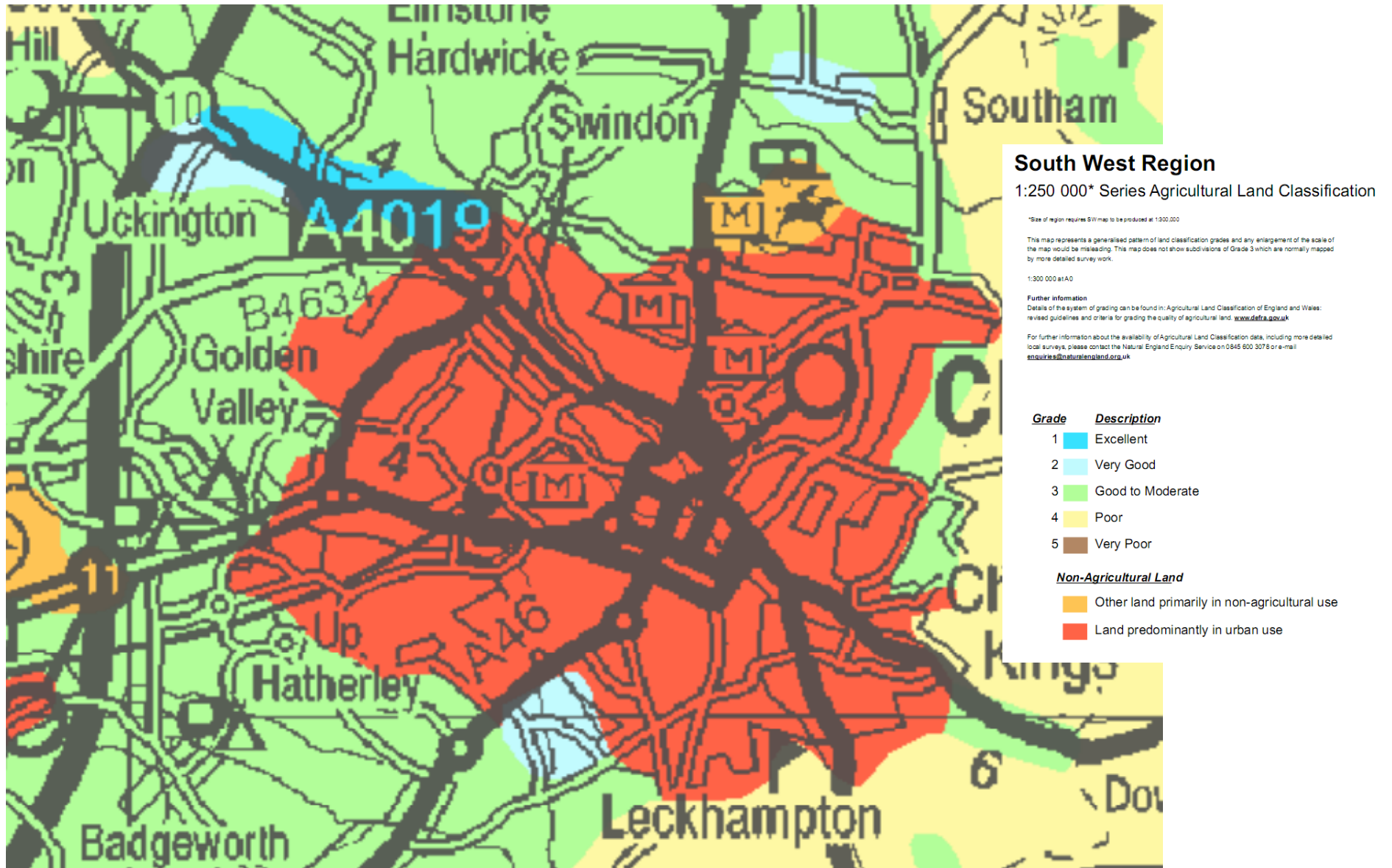


Figure 4 DEFRA Agricultural Land Classification, DEFRA website – Leckhampton

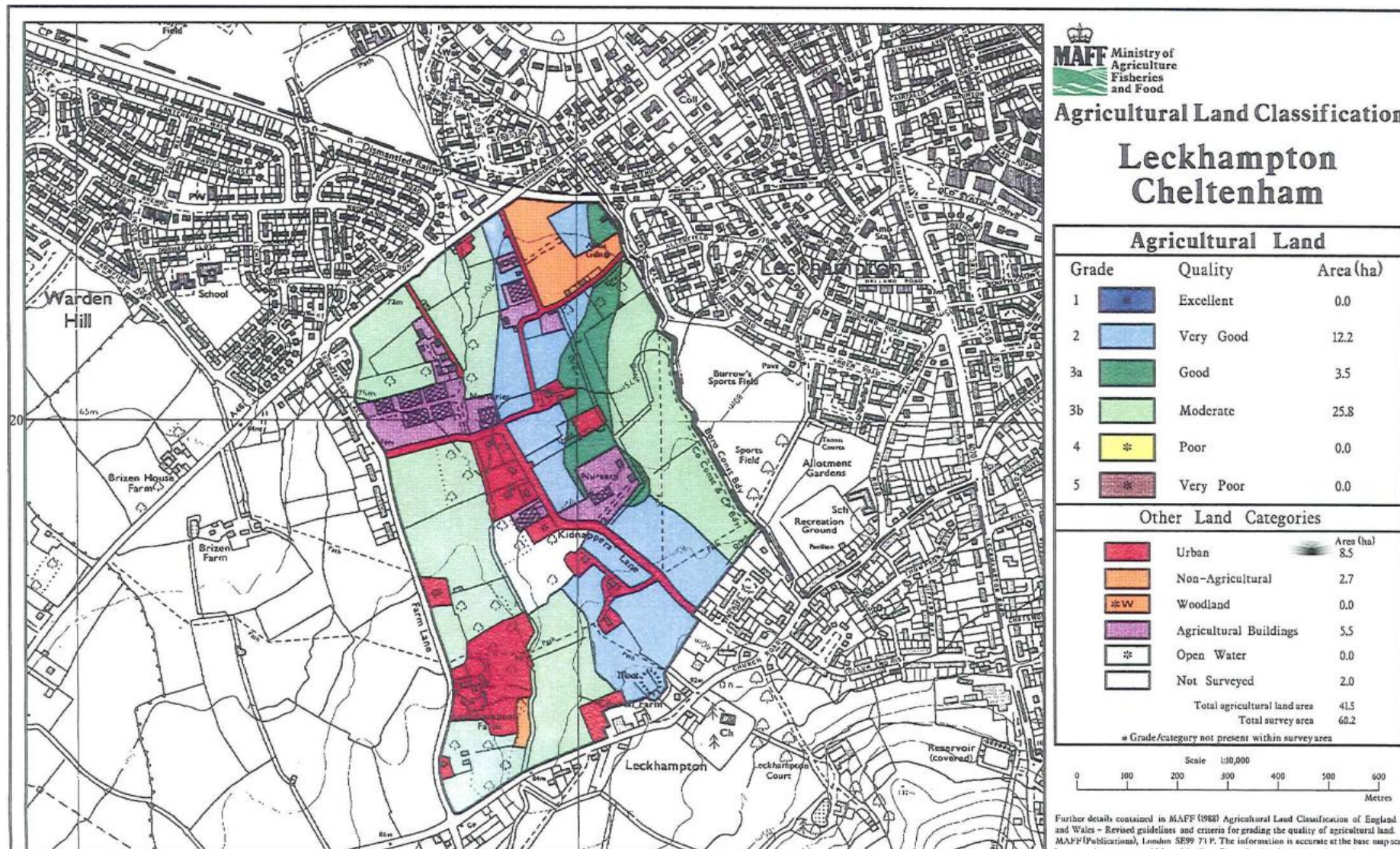


Figure 5 MAFF Agricultural Land Classification - Leckhampton

Annex B: Cheltenham Borough Council letter of support for call in 14/00838/FUL



CHELTENHAM BOROUGH COUNCIL

F.A.O. The South Team
National Planning Casework Unit
5 St Philips Place
Colmore Row
Birmingham
B3 2PW

ask for: Councillor Steve Jordan
ddi number: 01242 775 131
fax number: 01242 264 360
email: cllr.steve.jordan@cheltenham.gov.uk
our ref: SJ/JP
your ref:
date: 23 October 2015

Email:

npcu@communities.gsi.gov.uk

Dear Sir/Madam

Ref - Planning Application 14/00838/FUL

At a meeting of Cheltenham Borough Council on 19th October 2015 Cheltenham debated a motion in regards to permission granted by Tewkesbury Borough Council for the development of 376 new homes. The principle of development is not in question as it forms part of a strategic allocation contained within the submission version of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS). The strategic allocations contained within this plan were agreed by the three JCS councils and is currently subject of an examination in public.

Whilst the Borough Council did not object to the principle of development through the consultation on the scheme it did object to development being brought forward in a piecemeal way, failing to adequately demonstrate its contribution to comprehensive master planning of the strategic allocation proposed by the submission JCS. This requirement for comprehensive planning and development of the strategic allocation was a key reason for Cheltenham Borough Council's refusal of outline permission for 650 dwellings (13/01605/OUT) on the 31st of July 2014. Cheltenham Borough Council (an application subject to call in and subject to an inquiry which closes in November).

In correspondence made to Tewkesbury Borough Council dated 1 December 2014 and 6 July 2015 Cheltenham Borough Council set out its concerns over the landscape and visual impact of the proposal with regard to the AONB, the density of the proposed development and the lack of information as to how the scheme will contribute to the economic role of sustainable development by ensuring that development requirements are co-ordinated, including the provision of infrastructure. This includes concern about lack of green infrastructure within the site given the proximity to the AONB.

The Head of Planning of Cheltenham Borough Council emailed the case officer and Chair of Tewkesbury Planning Committee ahead of the Planning Committee meeting to determine the application, reinforcing the concerns set out by Cheltenham Borough Council and highlighting a specific request from a local action group (LegLag) in regards to the amenity space and provision of local area of play within the site.

The application site is directly adjacent to the administrative boundary of Cheltenham, set within the setting of the Cotswolds AONB and as noted above forms part of a wider strategic allocation proposed by the JCS. It is with regret that the Planning Committee of Tewkesbury Borough did not support our views.

Following the determination of the application for 369 new dwellings Cheltenham Borough Council has received communication from local residents concerning the impact of the scheme together with requests for the Borough Council to request call in of the application. In light of this the following motion was unanimously agreed by Council;

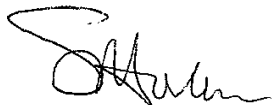
This Council requests the Leader of the Council to write urgently to the National Planning Casework Unit in support of the SD2 Call-In request in relation to Tewkesbury Borough Council Planning decision 14/00838/FUL consistent with the original letter of objection to this application sent by the Borough Council on the 6th July 2015.

A copy of the letter referenced is attached, together with correspondence dated 1 December 2014 and email dated 28 September 2015.

The Council is aware that local MPs have requested call in of the application and our support is offered for you to consider the details of that request.

In drawing to conclusion I formally request that application 14/00838/FUL is subject to call in by the Secretary of State. This offers the opportunity for the strategic allocation to be considered as a whole and the proposed JCS policy (policy SA1) appropriately considered in the delivery of comprehensive master planning.

Yours faithfully



Stephen Jordan
Leader of the Council

c.c. Rt Hon Greg Clark MP

Annex C: Cheltenham Borough Council letter of objections to 14/00838/FUL



Ms J. Desmond

Sent via email

ask for: Tracey Crews
ref number: 01242 264166
email: tracey.crews@cheltenham.gov.uk
cur ref:
your ref:
date: 6 July 2015

Dear Ms Desmond

Re: 14/00838/FUL

Further to contact with my colleague Philip Stephenson in regards the submission of comments in response to revised plans for application 14/00838/FUL, please find below a response on behalf of Cheltenham Borough Council. I apologise for the delay in getting these comments to you and thank-you for understanding our recent capacity constraints. The comments provided have been reviewed and endorsed by the Leader of Cheltenham Borough Council.

Whilst the Borough Council does not object to the principle of development it does object to development being brought forward in a piecemeal way, failing to adequately demonstrate its contribution to comprehensive master planning of the strategic allocation proposed by the submission JCS. This requirement for comprehensive planning and development of the strategic allocation was a key reason for Cheltenham Borough Council's refusal of outline permission for 650 dwellings (13/01605/OUT) on the 31st of July 2014.

Having reviewed the revised scheme the Borough Council would wish to add to the comments submitted in our previous correspondence to you dated 1st December 2014. I would be grateful if you could bring both this letter and our previous letter to the attention of the applicants and the Planning Committee of Tewkesbury Borough Council and take into account in your consideration of the scheme.

Master planning

Whilst there have been amendments to the scheme, including a reduction in the land take to the sensitive south of the site, the proposals are far from acceptable and do not fit well with the masterplan suggested at earlier stages of our consideration of this area. The result of the masterplan presented is that the built form continues too far towards the AONB. There appears to be no cohesion between the layout subject to application 14/00838/FUL and that proposed in the appealed proposal within CBC's boundary, application 13/01605/OUT.

There is a slight reduction in numbers but the reduction in land-take referred to above and the slight softening of the southern edge has probably pushed up densities further to the north. There are certainly some worryingly dense terrace and courtyard layouts in the northern section of the plan.

Mike Redman - Director
Environmental and Regulatory Services
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for additional pages, [complete letter of objection published here ...](#)

Annex D: LWWH PC letter to Pegasus Planning Consultants 18 November 2015

The Parish Council of Leckhampton with Warden Hill

Cheltenham, Gloucestershire

Clerk: Mrs A.J.Winstone, 7 Aldershaw Close, Up Hatherley, Cheltenham, GL51 3TP
tel. 01242 518008 email – leckwardenhillpc@btinternet.com

David Hutchison
Pegasus Group
Querns Business Centre
Whitworth Road
Cirencester
GL7 1RT

18 November 2015

Dear David

Land off Kidnappers Lane, Leckhampton

At the Pegasus community consultation event on 29 October you and I discussed how to ensure that any development on the Orchards/Nurseries site east of Kidnappers Lane is sufficiently sympathetic to the location. The site is close to the AONB and has a big impact on the nationally important view from Leckhampton Hill. I suggested the possibility that as part of the current neighbourhood planning for Leckhampton with Warden Hill Parish it might be sensible for Pegasus and the Parish Council to jointly examine what sort of development might be feasible and sufficiently sympathetic. I said that I would raise this possibility formally at the next Parish Council Public Meeting. I have done this and the Council passed a unanimous resolution that this would provide a sensible way forward and be consistent with the neighbourhood planning objectives. Neighbourhood planning also of course involves Cheltenham Borough Council and I am copying this letter to Tracey Crews, CBC Head of Planning.

The issue is how to make any development on the Orchards/Nurseries site sufficiently rural in character so that it does not look as if it is part of the Cheltenham urban area. Trees and hedgerows that screen the site are also very important. Currently the urban boundary is along the A46. As we discussed on 29 October, the concept in the revised Local Green Space (LGS) is to potentially bring that boundary an average of about 250 metres closer to the Hill, but certainly no closer than that. The original Local Green Space (LGS) application submitted in August 2013 included all of the Leckhampton Fields within the LGS and preserved the A46 as the boundary of urban Cheltenham. However, in Annex 2 of the August 2013 Neighbourhood Plan Concept we set out three other options (2, 3 and 4). The revised LGS that we put forward in January 2015 at the request of Cheltenham Borough Council was based on option 3.

In the revision we also removed from the LGS the Orchards/Nurseries site east of Kidnappers Lane. This has an area of about 3 ha and, of course, it includes the 1.3 ha of the nurseries site which is the subject of your proposals. We removed the Orchards/Nurseries site on advice from Gloucestershire Rural Communities Council, acting on behalf of CBC, because we felt that some development there might be acceptable provided it was sufficiently sympathetic to the location and impact on the views. Of course, at that time we understood that any development would involve just one developer, namely the consortium of Bovis Homes and Miller Homes that had included the Orchards/Nurseries site in their planning application 13/01605/OUT submitted in September 2013. We would certainly not have removed this land from the LGS had we known that Bovis Homes and Miller Homes did not control development over the whole site and that the land might consequently become the subject of two or even three separate applications from different developers for individual parcels of land. To achieve sufficiently sympathetic development it is necessary to be able to plan the site as a whole. Cheltenham Borough Council has been arguing very strongly for the necessity to have a masterplan approach for the entirety of development on the Leckhampton Fields and that very much applies for any development on the Orchards/Nurseries site. As I said to you, we shall be drawing attention to this problem in the submission that we are due to make at the beginning of December to Inspector Elizabeth Ord who is considering the LGS as part of the Examination in Public of the Joint Core Strategy.

As you know, Natural England objected strongly to application 13/01605/OUT on various grounds including the damage it would do to the view from Leckhampton Hill. On this, Natural England said: 'There are viewpoints of the highest sensitivity along the Escarpment of the Cotswold AONB, such as the Devil's Chimney. The view from the Devil's Chimney gives panoramic views across the Vale which would be interrupted by the proposed development. The scale of the potential development would significantly change the view from an open, rural expansive view to a predominantly urban view of the edge of Cheltenham'. To keep the view rural and open and to avoid it being 'interrupted', as Natural England says, we need to retain sufficient rural foreground on the Leckhampton Fields. Currently the rural foreground is sufficiently large and the edge of urban Cheltenham is sufficiently distant from Leckhampton Hill that the overall appearance is rural. The view is not interrupted because the eye can skip from the rural Leckhampton Fields across Cheltenham (with the help of its abundance of trees) to the rural Severn Vale beyond and then to the Malvern Hills and more distant Herefordshire and Shropshire Hills. As I mentioned, this was an issue raised by Inspector Clark at the recent inquiry on the 13/01605/OUT appeal.

To preserve the rural foreground on the Leckhampton Fields, we need to ensure that any development allowed on the Orchards/Nurseries site is well screened and that it looks like a small rural hamlet. It is essential that it does not look suburban and the sort of development you are currently proposing would seem very unsuitable. As I said to you on 29 October, an example we have in mind of the sort of housing that might work is the recent development at Leckhampton Farm Court, east of Farm Lane. This is based substantially on farm buildings and the old listed farm house and it blends in well with the surrounding area and as viewed from Leckhampton Hill. The area of Leckhampton Farm Court is much smaller than the 3 ha of the Orchards/Nurseries site and there is a question of how effectively it could be scaled up, but there are many examples of rural hamlets and of sympathetic developments in rural villages that might also serve as models. It is worth noting that Leckhampton Farm Court includes one large building that has 2.5 stories, yet looks in keeping. This, or one of the other buildings at Leckhampton Court Farm, also contains six dwellings. The point here, as I mentioned to you on 29 October, is that one might be able to achieve a reasonable density of dwellings per ha for a rural-looking development with an overall building footprint that leaves good space on the site for large trees to soften and screen the development. The housing density proposed in 13/01605/OUT for the Orchards/Nurseries site is around 20 dwellings per

hectare. Also, as I said to you, the problem of traffic congestions on Church Road and on the A46 imposes a major constraint on the amount of development that can be sustainable on the Leckhampton Fields. So, for traffic as well as landscape reasons, it is not realistic to think in terms of very high housing densities.

The problem of traffic congestion is another reason that a firm masterplan approach is required, as argued by Cheltenham Borough Council. Traffic congestion and landscape were the two main reasons that CBC refused application 13/01605/OUT and these factors would certainly apply to any development you were proposing.

I think this covers the most of what we discussed on 29 October. I look forward to hearing from you whether you think it would be useful to explore opportunities further through the neighbourhood planning.

Best wishes

Dr Adrian Mears CBE
Chairman

Copy: Tracey Crews, Head of Planning, Cheltenham Borough Council

Annex E: LWWH PC submission to 13/01605/OUT appeal 3 November 2015

The Parish Council of Leckhampton with Warden Hill

Cheltenham, Gloucestershire

Clerk: Mrs A.J.Winstone, 7 Aldershaw Close, Up Hatherley, Cheltenham, GL51 3TP
tel. 01242 518008 email – leckwardenhillpc@btinternet.com

Inspector Paul Clark,
c/o Peter Kozak, Major Casework Team,
Planning Inspectorate
3/26 Hawks Wing, Temple Quay House
2 The Square, Temple Quay,
Bristol BS1 6PN

2 November 2015

Dear Inspector Clark

DCLG Reference: APP/B1605/W/14/3001717; CBC Reference: 13/01605/OUT
Supplementary points of evidence for submission by 3 November 2015

There is a point in the evidence that I gave you that I would like to update and another that I would like to amplify. In addition to this, Leglag has asked the Parish Council to agree the seven points of common ground that Leglag submitted before the Inquiry and that it was agreed they would come back on by 3 November. The seven points are set out in Table 3 below. The Parish Council is not able to agree all of the points precisely as stated by Leglag. But in the table it provides comments on each of the seven points.

1. Update and amplification of evidence

In answer to one of your questions, I stated that Leckhampton Hill is one of only seven viewpoints identified in the AA 4 inch to the mile Road Atlas of Great Britain in a 50,000 square kilometre swathe from the Pembrokeshire Coast to the Essex Coast. I have since made a more detailed search of the road atlas and have found that the number should have been ten rather than seven. I have also found that across the whole of Great Britain, the road atlas identifies a total of 46 viewpoints: 29 in England, 6 in Wales and 11 in Scotland. The full list is shown in Table 1 below for England and Wales and Table 2 for Scotland. I do not know many of these viewpoints myself, but those that I do know are certainly all ones that I would put on my shortlist of the finest views I have seen in the UK.

The 46 viewpoints are a surprisingly small number given that the list covers the whole of Great Britain. This emphasises how significant Leckhampton Hill is as a viewpoint. Moreover, these are not simply viewpoints that are easily reached by car. Of the viewpoints that I know,

Dunkery Beacon and Robinswood Hill both involve around 150 metres of ascent by foot and Bealach-Na-Ba involves an ascent of around 700 metres on a narrow road.

I would also like to amplify the point in our Parish Council evidence that NPPF paragraphs 115 and 116 on AONB landscape apply to the Leckhampton Fields as well as paragraph 109 on valued landscape. The appellants argued in their evidence that paragraphs 115 and 116 do not apply because the Leckhampton Fields are not in the land area of the AONB. However, land area is not the same thing as landscape. Paragraph 115 says that 'Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.' The Oxford English Dictionary defines landscape as:

"A sight or prospect of some landscape or extended scene; a view from a high point; an extent or area covered by the eye from one point; a view presented by an expanse of terrain or district which is visible from a particular place or direction; an expanse of (country) scenery; *Geogr.* a tract or region of land with its characteristic topographical features, esp. as shaped or modified by (usu. natural) processes and agents".

Therefore, whilst the Leckhampton Fields are not within the land area of the Cotswold AONB, they are within its landscape. This is further evidenced by the fact that Natural England on the front cover of the National Character Area profile for the Cotswolds chooses to show not a picture of the High Wold but rather the view west across the Severn Vale from the Cotswold Escarpment. This emphasizes that the Escarpment view is very much part of the Cotswold landscape and arguably the most magnificent part of the landscape. It is along the escarpment that the Cotswold Way National Trail runs.

The actual view shown by Natural England on the cover of the Cotswold Character Area profile is the view from Barrow Wake. This viewpoint is about 2 miles south-west of Leckhampton Hill along the escarpment and, like Leckhampton Hill, it is one of the 46 viewpoints identified in the AA 4 inch to the mile national road atlas, as shown below in Table 1.

Seven points put forward by Leglag

In the Inquiry, Leglag for reasons of cost left it to the Parish Council to present the arguments on landscape, traffic and Local Green Space. In its closing remarks Leglag supported all of the evidence that the Parish Council had given and this demonstrates the common ground between the Parish Council and Leglag in these areas. The Parish Council's response to the seven specific points that Leglag put forward are shown in Table 3 below.

I would like in closing to thank you for your expert and gracious handling of the Inquiry. It was the first time that I have appeared at an Inquiry as a Rule 6 party and it was a more relaxed and rewarding experience than I had expected.

Yours sincerely
Dr Adrian Mears CBE Chairman

Table 1 : AA 4 miles to 1 inch scale Road Atlas of Great Britain - Viewpoints in England and Wales identified in the touring information shown on the maps

Pg.	Ref.		
5	R4	Dunkery Beacon	Exmoor, Somerset
6	E8	Wellington Monument	Blackdown Hills, Somerset
7	P10	Bulbarrow Hill	Dorset
8	E7	Pepperbox Hill	Hants
8	K14	Bernbridge Down	Isle of Wight
9	Q9	Dunction Hill	South Downs, W Sussex
10	C5	Epsom Down	North Downs, Surrey
12	G5	Foel Eryr	Pembrokeshire
14	F7	Sugar Loaf	Black Mts., Monmouthshire
14	J14	Portishead	Severn Estuary, N. Somerset
15	P8	Robinswood Hill	Gloucestershire
15	Q7	Barrow Wake	Gloucestershire
15	R7	Leckhampton Hill	Gloucestershire
15	T14	Barbary Castle	Marlborough Downs, Wiltshire
16	D1	Magpie Hill	Warwickshire
16	F11	Wittenham Clumps	Oxfordshire
18	H15	One Tree Hill	Essex
20	N4	Town Hill	Powys
21	U8	Clee Hill	Shropshire
22	K14	Central Forest Park	C. Stoke
23	L12	Clent Hills	Worcestershire
23	L12	Windmill Hill	Worcestershire
23	M9	Barr Beacon	Birmingham
23	T6	Beacon Hill	Leicestershire
28	B5	South Stack	Anglesey
28	K4	Great Orme Head	Conwy
29	S9	Waun-y-Llyn	Flintshire
30	H11	Mersey View	Cheshire
31	P9	Werneth Low	Derbyshire
31	R7	Holme Moss	Peak District, Derbyshire
31	T11	Hathersage Booths	Peak District, Derbyshire
32	B14	Highoredishy	Derbyshire
36	J9	Sutton Bank	Yorkshire Moors, N Yorkshire
37	P8	Hole of Horcam	Yorkshire Moors, N Yorkshire
47	Q12	Ros Castle	Northumberland

Table 2 : AA 4 miles to 1 inch scale Road Atlas of Great Britain - Viewpoints in Scotland identified in the touring information shown on the maps

Pg.	Ref.		
44	E3	Queen's View	E. Dunbartonshire
45	M4	Cockleroy	W. Lothian
46	H11	Scott's View	Eildon Hills, Border
46	J15	Carter Bar	Cheviot Hills, Border
49	U15	Queen Elizabeth Forest Park	Stirling
50	D6	Queen's View, Loch Tummel	Perth and Kinross
51	R5	Blackford Hill	Edinburgh
52	D8	Bealach-Na-Ba	Highlands
52	K14	Glen Garry	Highlands
57	Q16	Struie Hill	Highlands
65	J12	Knockon Cliff	Highlands

Table 3: Parish Council's response to the seven points put forward by Leglag

1. *Could we agree that the Shurdington Road (A46) is at capacity and any further traffic delay at peak times for northbound traffic caused by additional lights and volume would displace traffic from Shurdington Road to Leckhampton Village along Church Road, with this ongoing displacement continuing until the highways network achieves a balance on journey times.*

Parish Council's response: The statement accords with the evidence that the Parish Council has presented to the Inquiry. With the current peak morning queue length on the A46, the journey from Shurdington to central Cheltenham via the A46 is not a lot longer in time than via the (longer in distance) Leckhampton Lane – Church Road – Leckhampton Road / Moorend Road / Moorend Park Road (LL-CR-LR/MR/MPR) route. However, if the A46 queue consistently extends further than the Up Hatherley Way roundabout, the A46 route becomes sufficiently longer in time than the LL-CR-LR/MR/MPR route and traffic will divert onto that route to by-pass the A46 queue. This already happens on days when the traffic on the A46 is unusually high. As traffic from new housing lengthens the A46 queue, traffic will divert until Church Road jams completely. When this happens, as it did co-incidentally on the first day of the Inquiry, it creates traffic queues in all directions along Charlton Lane, up Leckhampton Road towards Leckhampton Hill, along Church Road west of Kidnappers Lane and along Kidnappers Lane. At present, the jam when it occurs can persist for up to 30 minutes or more before it is able to dissipate. The extra traffic from housing development will make jams in Church Road occur more frequently and possibly even daily. Bovis-Miller spent a lot of time in 2012 and 2013 trying to find a solution to the problem. They submitted various schemes to public consultation including closing Leckhampton Lane completely. Finally in application 13/01605/OUT they proposed using one-way traffic flow sections (chicanes) along Leckhampton Lane to try to discourage the use of this route. They have now abandoned this proposal, which means that there is now nothing apart from jamming of Church Road that will limit the traffic flow via the by-pass route.

2. *Could we agree that one of the major inspirations for the Rev. Charles Dodgson alias Lewis Carroll, for the enchanting children's story of Alice in Wonderland was the view from Leckhampton Hill across Leckhampton and the Severn Vale in the spring of 1863 on his walks with Alice, Lorina and Edith Liddle on holiday in Cheltenham.*

Parish Council's response: Newspaper articles, including in the national press, have claimed that the view from Leckhampton Hill was the inspiration for the giant chess-board of fields and hedgerows in Alice Through the Looking Glass. There is reasonably good evidence that this is largely correct, although the evidence is entirely circumstantial. However, the Parish Council does not believe that this issue is germane to the Inquiry. In the public consultation in January 2015, no residents mentioned anything about Alice in Wonderland or Alice Through the Looking Glass apart from the one resident who sent an original copy of one newspaper article as a point of interest. The reasons that people value the view from Leckhampton Hill relate to its landscape quality, as explained in the various responses to question 6 of the public consultation; they do not derive from any association with Alice in Wonderland.

3. *Could we agree that the most comprehensive report on the landscape appraisal of Leckhampton is the report commissioned by Cheltenham Borough Council in 2003: 'Landscape and Visual Appraisal, Final Report, Landscape Design Associates'. This report is independent and the Leckhampton area has not changed materially from its rural character of 2003.*

Parish Council's response: The Council full agrees and has used the LDA report heavily in its evidence to the Inquiry on landscape.

4. Could we agree that It would be advantageous to the public purse and entirely logical to resolve the NPPF Local Green Space application submitted by Leckhampton with Warden Hill Parish Council in the August of 2013 and revised in January of 2015, with common ground to be established on the LGS as requested by Inspector Ord at the Joint Core Strategy Examination in Public (EiP) on Leckhampton (matter 8).

Parish Council's response: The Local Green Space application is a major part of the Council's evidence. The Council believes and has argued that it is in the national interest for the process of examination of the LGS application being conducted by Inspector Elizabeth Ord to be allowed to reach a proper conclusion, whatever this may be.

5. Could we agree that Cheltenham Borough Council requested that the original Bovis-Miller Planning Application 13/01605/OUT not to be submitted until the Joint Core Strategy and C6 South Cheltenham Master Planning was complete.

Parish Council's response: The Parish Council was not party to any discussions on this issue and cannot say whether the statement is correct. However, the Parish Council does believe that it is a serious weakness of the appellant's case that it relies so heavily on the JCS over which there are still some major uncertainties.

6. Could we agree that Cheltenham Borough Council voted unanimously in a resolution to request removal of the Leckhampton Strategic Site from the Joint Core Strategy on 28 February 2014. This was subsequently rejected by Tewkesbury Borough Council and Gloucester City Councils with minimal reporting.

Parish Council's response: The Parish Council believes this statement is correct. It is confirmed by the three Borough Councillors who are members of the Parish Council, one of whom was the proposer of the resolution. The Parish Council included the minutes of the 28 February 2014 meeting as one of its evidence documents to the Inquiry.

7. Could we agree on the definition of 'severe' in the context of the NPPF paragraph 32 on Transport, specifically on the cumulative impacts of development, perhaps drawing parallels to the saving in journey time from Birmingham to London with the investment in HS2? This is a twenty minute saving for an investment of £43B (DOT) to £80B (IoEA), that 20 minutes must be important from a planning viewpoint and provides some guidance to the interpretation of the NPPF para 32.

Parish Council's response: The fact that the Government has not defined what 'severe' means has made it quite difficult for planners to make decision about sustainability from a traffic perspective. Gloucestershire Highways in the verbal evidence to Cheltenham Borough Planning Committee on application 13/01608/OUT on 31 July 2014 said that the traffic problem was not severe because it was possible to find traffic problems elsewhere that were more severe. However, this is not a good argument because it leads to the conclusion that traffic congestion is never severe because it is always possible that one could find worse congestion somewhere else. Gloucestershire Highways in their written evidence on 13/01605/OUT suggested analogies with 'severe weather'. The Oxford English Dictionary defines severe weather as 'e.g. a storm or heavy snowfall', which it not particularly rare. The Parish Council does agree with the CBC

Planning Committee's judgement that the traffic problem posed by 13/01605/OUT is severe in the NPPF sense. In its evidence the Parish Council observes that Church Road provides the only road access to the 300 or so houses in Leckhampton Village and that if Church Road jammed frequently it would be a serious problem for residents. The Parish Council has also in its evidence noted the economic cost of traffic queues imposing long delays on commuters, wasting time and money and driving employment away from Cheltenham. The Parish Council also noted that the Government is proposing to spend around £250 million on upgrading the A417 up Crickley Hill (so-called 'missing link'). The main justification for this investment is economic, both for national transportation and locally for Cheltenham and Gloucester. In the Cheltenham context, it does not make good sense to make this investment to save 10 minutes or so of journey time on the A417 and then to inject a considerably longer journey time through allowing heavy congestion on the A46, which connects Cheltenham to the A417. In the end, however, it is not the place of the Parish Council to try to suggest definitions for 'severe'. It is for inspectors and courts to decide, and the current lack of definition does have the merit of allowing flexibility to inspectors to make a judgement about severity taking into account the specific context and details of the case concerned.

**Annex F: LWWH PC Proof of Evidence and Summary Proof of Evidence to
13/01605/OUT Appeal**

**LAND AT LECKHAMPTON
SHURDINGTON ROAD CHELTENHAM**

**Transport, Landscape
and Local Green Space**

Summary of Proof of Evidence by

Dr Adrian Mears CBE

**DCLG Reference: APP/B1605/W/14/3001717
Cheltenham Borough Council Reference: 13/01605/OUT**

APPEAL BY BOVIS HOMES LIMITED AND MILLER HOMES

AUGUST 2015

1 PERSONAL QUALIFICATIONS AND SCOPE OF EVIDENCE

I am Dr Adrian Mears CBE, chairman of Leckhampton with Warden Hill Parish Council. I am a former top civil servant and director of a large plc. I provide this Proof of Evidence on behalf the Parish Council in support of Cheltenham Borough Council's decision to refuse planning permission. I concur with the Borough Council on their reasons for refusal and the Policy base against which they reference their case.

1.1 The Borough Council gave nine refusal reasons. This proof of evidence only addresses matters of:

- traffic, transport and travel (reason 4);
- landscape (reason 5);
- local green space (reason 3).

2 TRANSPORT

2.1 The road network in this part of Cheltenham already suffers from congestion, and the appellants' Transport Assessment and Supplementary Transport paper identified four key junctions to be operating over capacity in the reference year of 2023 without the proposed development in place. The appellant makes the case that, in general, the proposed development makes no material difference. However, the key point is that the traffic network in this location is broken now and operating beyond reasonable capacity. The proposed development would seriously exacerbate the existing and future traffic congestion on the A46 and connecting roads and junctions.

2.2 This conclusion is also borne out by the extensive traffic surveys and analysis that the Parish Council has conducted for its neighbourhood planning with assistance from a traffic consultant, Rob Williams of Entran. This work, set out in CD/HIG2, considered all of the developments under consideration by the Gloucester-Cheltenham-Tewkesbury Joint Core Strategy as well as the development covered by this appeal.

2.3 Additional traffic on a road network already operating over capacity will cause increased traffic queues, congestion, travel times, driver delays, pollution and driver frustration.

2.4 This part of Cheltenham is the most car-dependent area. Few people cycle because of the danger and lack of dedicated cycle tracks. The Council is examining through neighbourhood planning how to increase walking and use of public transport. But it is questionable whether public transport, cycling or walking provide much scope to ameliorate the traffic problem in the peak traffic period.

2.5 I find it surprising that both the appellant and the County Council consider that the cumulative impacts of the development to not be severe and that the development will actively manage patterns of growth. The appellant has failed to demonstrate that the proposed mitigation measures will off-set the traffic and transport impact demonstrated in their own Transport Assessment.

2.6 The indicative plans provide for the diversion of Kidnappers Lane through the site which will give rise to a rat-run and consequently add to highway danger to both road users and pedestrians.

2.7 It is vital to avoid adding additional traffic to the existing 1300 vehicles currently using Church Road during the peak morning period. I appreciate the effort the appellant went to in 2012-13 in search of a solution. Their proposal to use complex chicanes to impede traffic along Leckhampton Lane may be the best option found. But it will not provide sufficient time delay to prevent Leckhampton Lane and Church Road becoming used as a by-pass to the A46 traffic queue, with the consequent likelihood for frequent gridlocking of Church Road. The chicanes also create a 24 hour hazard on what is the vital traffic route round the south side of Cheltenham. The view expressed by previous inspectors and recently by Gloucestershire Highways Area Manager is that Church Road is already operating at or over its maximum capacity. This is a serious problem. The traffic system is broken: it still just functions at the current traffic levels but only a small increase in commuter traffic would cause it to fall apart.

3 LANDSCAPE

3.1 The landscape value of the Leckhampton Fields was comprehensively assessed for Cheltenham Borough Council in 2003 by Landscape Design Associates (CD/LH3). The landscape now is essentially the same as then and in 1993 when the Planning Inspector concluded that 'it would be very sad indeed if development were to proceed at Leckhampton, with its variety and interest' and that the land should be protected 'because of its varied topography, landscape history, dense network of footpaths, and pedestrian access from several residential districts.'

3.2 The LDA study concluded that the land 'represents a valuable and sensitive landscape which is well used by local people as an area of countryside close to the urban area within which large scale development would be visually intrusive and adversely affect views to and from the Cotswold AONB. Whilst the site could accommodate small scale change and development, it is considered highly vulnerable to the effects of large scale development. The protection of the landscape should therefore continue to be the primary objective.'

3.3 The Inspector in 1993 described the Leckhampton Fields as ‘a complex mosaic of uses and features, full of historic interest and highly visible from the important Cotswold scarp’. It is this intimate small-scale nature of the landscape, its mosaic of land uses, many varied trees, brooks, old cottages, orchards, old nurseries, birds, wild animals, farm animals and views in all directions and particularly to and from Leckhampton Hill that makes the area so special and also such a valuable local amenity greatly cherished by local people. It is an unusual rural landscape rare to find today and its great variety and interest at every turn makes it constantly rewarding to walk around.

3.4 Refusal reason 5 makes a number of points regarding the impact of the proposed development on the views from the A46 across the Leckhampton Fields to Leckhampton Hill, on the view from Leckhampton Hill and AONB across the fields, and on the views within the Leckhampton Fields themselves.

3.5 The fine views of Leckhampton Hill from the A46 are important to Cheltenham as a gateway view for traffic entering Cheltenham along the A46 from the south-west. This together with most other views from the A46 would be lost.

3.6 Within the appeal land, there are many fine views of Leckhampton Hill and views across the Leckhampton Fields, from Lotts Meadow, Robinswood Field and the smallholdings. The appellant proposes leaving Lotts Meadow as open land, but the other views would be lost.

3.7 The proposed development would also seriously harm the nationally significant view from Leckhampton Hill. The Leckhampton Fields form a rural foreground immediately below the viewpoint and are very important to its exceptional beauty. As stated by Natural England development would turn what is predominantly a rural view across the Severn Vale into a view across urban Cheltenham. The huge value and importance of the views from Leckhampton Hill to local people is well demonstrated in 1508 responses to the public consultation on the Leckhampton Fields in January 2015 (reference CD/LH2).

4 LOCAL GREEN SPACE

4.1 As part of its neighbourhood planning, the Parish Council jointly with Shurdington Parish Council submitted a Local Green Space (LGS) application for the Leckhampton Fields in August 2013. This was accepted as an input to the consultation on the draft Gloucester-Cheltenham-Tewkesbury Joint Core Strategy (JCS). However, the JCS team then mishandled the application by relegating it to the local plans. This was tantamount to rejection because the local plans have to

be consistent with the JCS and the indicative development area proposed on the Leckhampton Fields by the JCS was incompatible with the proposed LGS. The mishandling leaves the JCS open to legal challenge. With the agreement of all parties – developers, officers and councils – the issue is being urgently examined by Inspector Elizabeth Ord, who is handling the JCS Examination in Public.

4.2 It is highly important that the process being conducted by Inspector Ord is properly concluded not only so the JCS is legally sound but also in a national context. The government is putting high priority on Localism and Neighbourhood Planning as a way to bring land forward for development in a way that has support from local people. For various reasons the Leckhampton Fields LGS is something of a test case, including the fact that the Leckhampton Fields were a model used in framing the LGS legislation within the NPPF.

5 CONCLUSION

5.1 The Parish Council has submitted strong evidence in support of the decision to reject the application based on:

- the seriousness of the traffic problems;
- the degree of damage to valuable landscape including to the AONB and the nationally significant view from Leckhampton as well as to the Leckhampton Fields themselves;
- the need for the process of examining the Leckhampton Fields Local Green Space proposal, currently being handled by Inspector Elizabeth Ord through the JCS Examination in Public, to be allowed to reach an objective and sound conclusion that commands public respect and confidence.

5.2 The Parish Council therefore respectfully requests that the Secretary of State should dismiss the appeal.