## Statement to Inquiry ref Land at Oakley Farm Pastures made on behalf of The Trustees of the Battledown Estate

7 September, 2021

My name is Roger Willbourn and I am a **Trustee of the Battledown Estate**; I am delivering this Statement on behalf of all the Trustees of the Estate, which was established in 1859 and covers approximately 120 acres on Battledown Hill. The Estate directly borders the land which is the subject of this Inquiry, lying as it does along the entire length of the southern boundary of the Oakley Farm pasture-land on Harp Hill.

The Trustees are a registered Consultee to CBC on local developments of direct relevance to the Estate.

We have submitted a detailed written objection to the proposed development on this land, as per the application dated 25th June 2020. These objections may be viewed on the Cheltenham Borough Council planning web-portal and so I shall not repeat them all here.

Today I am briefly emphasising three issues which are amongst those of the greatest importance relating to the Estate.

**Firstly,** the road access and related transport infrastructure are inadequate. As was noted after a smaller development proposal on a nearby site was called-in to the Secretary of State for the Environment in 1984 (and I quote the borough architect of the time), "the surrounding roads are inadequate to cope with the anticipated number of vehicles". The London Road and Hales Road are still routinely grid locked. Traffic from this site would either go down Harp Hill to Hales Road or down Greenway Lane to the London Road at the notoriously jammed Sixways Junction. Charlton Kings didn't have the required road infrastructure back in 1984, and it most certainly does not now, some 37 years later, given the huge increase in traffic during the intervening period.

The existing residents on Harp Hill would have their lives made significantly more dangerous by the hundreds of additional car, van and truck journeys up and down the steep and, in many places, unacceptably narrow Harp Hill road every single day. The developers may produce numerous charts and figures in an attempt to display a theoretically acceptable increase in traffic but those of us who live in the practical environment of the Real World know only too well that any development of the Oakley Farm Pastures land would inevitably lead to increased road traffic dangers and numerous accidents, including injury and probably loss of life.

**Secondly,** it is essential for all parties to note that the application to develop this land is **NOT** Plan-Led. There are numerous development plans for thousands of residential properties to be built in the greater Cheltenham area, which are currently being, and will be, processed by the Borough Council Planning Department and which have been made in accordance with the provisions of the recently adopted Cheltenham Local Plan. It is completely unnecessary to destroy this green-field pasture land (which is **not** Zoned for house-building) when there are large areas of land as yet undeveloped -- which have already been granted housing development status by the Borough Council within the muchdebated and widely approved Local Plan.

Finally, and perhaps most importantly, this pasture land is located firmly within the Cotswold AONB. To all local residents, both those living within the Battledown Estate and the thousands of others living on Harp Hill road and other surrounding streets, it is almost inconceivable that any application could have been lodged to build any large-scale housing within this part of the Cotswold AONB. Whilst we accept that commercial incentives provide motivation for many housing developers, it is quite shocking to register that this motivation is sufficiently powerful so as to induce a plan to irrevocably destroy AONB land; land which has been carefully placed under such nationally recognised protection by past generations in the expectation that it will be safeguarded in perpetuity for the benefit of all future generations. It should be obvious to all, although perhaps not to the applicant, that once AONB land is built upon, then that is it - there can be no turning back and its status as a valuable area of protected natural beauty will have been destroyed for all time.

In conclusion, on behalf of the residents of the Battledown Estate, we trust that the Inspector will find that the multiple objections raised to this development are sound and we strongly urge you to refuse the appeal.

Thank you.

## R. S. WILLBOURN

For and on behalf of the Trustees of the Battledown Estate