

LECKHAMPTON WITH WARDEN HILL PARISH COUNCIL

**THE JOINT CORE STRATEGY IS FAILING CHELTENHAM
PLEASE READ THIS BRIEF AND HAVE YOUR SAY**

CONSULTATION CLOSES 17:00 18th AUGUST – POST YOUR REPLY BY 15th AUGUST

After five years of preparation by the three councils of Cheltenham, Gloucester and Tewkesbury, the strategy for the local area, known as the Joint Core Strategy (JCS), is about to be submitted to the Planning Inspectorate. Local residents are again being asked for their views. You may have responded to the earlier JCS consultations, **but it is only the responses to this final consultation that the Inspector will consider now.** It is therefore vital that as many residents as possible respond; otherwise the Inspectorate may assume that everyone is happy with what is being proposed.

Breaking the local traffic system: For residents in South Cheltenham, the biggest concern is that, despite all the protests and evidence, the Leckhampton Fields are still included as a development site for 1124 homes. The extra traffic from this development, together with traffic from the 1500 new homes that the JCS is proposing at Brockworth, will cause the morning A46 traffic queue to reach down to the A417 or beyond. Church Road, which currently handles 1300 cars in the peak morning period, will be choked with heavy traffic avoiding the A46 queue. The difficulty of commuting into Cheltenham will damage the local economy. The traffic problems will spread from the Moorend Park Road junction to other areas including The Park, Moorend Road and the Bath Road. To avoid the A46 queue, traffic may also divert by Leckhampton Hill and along Leckhampton Road and Old Bath Road.

Name:.....

Address:Postcode.....

(Please delete any statement below that you do not wish to include – note that ‘not legally compliant’, ‘not sound’, ‘not positively prepared’, ‘not justified’, and ‘inconsistent with national policy’, are required wording.)

I believe that the JCS is NOT LEGALLY COMPLIANT AND NOT SOUND for the following reasons:

1. The Pre-submission Draft is not positively prepared or justified and is inconsistent with national policy because its proposed strategic development at Leckhampton undermines the current traffic system and it fails to provide a sustainable transport infrastructure, contrary to section 4 of the NPPF. It also fails to address clearly the provision of secondary education in accordance with paragraph 72 of the NPPF.
2. It is not justified and is inconsistent with national policy because it fails to give appropriate protection to the Leckhampton Fields in accordance with section 8 paragraph 77 of the NPPF and NPPF sections 11 and 12, taking into account the recommendations from previous planning inspectors and expert landscape consultant studies on the special community, historical and landscape value of the Leckhampton Fields and their relationship to the Cotswold Area of Outstanding Natural Beauty.
3. It is not legally compliant and is inconsistent with national policy because it fails to take account of the Local Green Space application and the evidence on traffic problems in the Neighbourhood Planning Concept submitted by Leckhampton with Warden Hill and Shurdington Parish Councils relating to the Leckhampton Fields. The evidence was set aside without informing the parish councils. This is contrary to Community Empowerment and Neighbourhood Planning and undermines public trust in government.
4. It is not positively prepared because the housing need is not objectively determined. It uses population projections higher than those predicted from the 2011 census and the Office of National Statistics. It is based on assuming a future fall in household size that is speculative and unsupported by historical evidence or observable social and household trends. This is contrary to section 14 of the NPPF.

Lack of infrastructure and schools: The JCS involves a very high infrastructure cost. This will squeeze any money available for affordable housing and other investments. It is also still unclear how enough local secondary schooling can be provided for families in South Cheltenham.

Destruction of local beauty and amenities: In 1993, the planning inspector concluded that the Leckhampton Field area should be protected from development *'because of its varied topography, landscape history, dense network of footpaths, and pedestrian access from several residential districts,'* and that *'it would be very sad indeed if development were to proceed at Leckhampton.'* An expert study commissioned by Cheltenham Borough Council in 2003 reached the same conclusion. In August 2013, Leckhampton with Warden Hill and Shurdington Parish Councils jointly submitted a Local Green Space (LGS) application to protect the Leckhampton Fields from inappropriate development. This LGS application was wrongly ignored by the JCS team.

Excessive development: The National Planning Policy Framework (NPPF) says the JCS must be based on objectively assessed housing need. The JCS still overestimates the housing need: at 30,500 compared with 23,500 calculated from projections by the Office of National Statistics (ONS). For Cheltenham, the JCS predicts average population growth of 860 per year and the ONS predicts 780 per year, but the actual growth from 2011 to 2013 was only about 250. The JCS also exaggerates the housing need because it believes household size will fall. Average UK household size did fall between 1911 and 1991 because of smaller families and greater affluence. But since 1991 it has been constant. The JCS assumes it will start falling again, but there is no real evidence to support this.

HOW TO RESPOND Send response form to JCS Team, Municipal Offices, Cheltenham, GL50 9SA **or** scan the completed response form into pdf and email it to **temporaryjcs@tewkesbury.gov.uk** **or** if all else fails, just email your name, address and postcode plus the message *'I believe that the JCS is NOT LEGALLY COMPLIANT AND NOT SOUND for the reasons 1,2,3 and 4 in form LWWH1408'*.

**TO POST, USE AN ENVELOPE
OR FOLD THE FORM IN HALF
VERTICALLY AND SEAL TOP
AND BOTTOM WITH A LITTLE TAPE
OR RETURN THE WHOLE SHEET
FOLDED IN FOUR AND LIGHTLY
SEALED, IF YOU PREFER.**

**STAMP
NEEDED
(small
letter)**

**JCS Team
Municipal Offices
Cheltenham
GL50 9SA**