



# Leckhampton with Warden Hill Parish Council

Thank you for the opportunity to comment on the latest planning documents for the new secondary school in Cheltenham, recently added to the GCC website since our original response on 16 Oct. We subsequently asked for a meeting to discuss our detailed concerns and your observations, as the subject is complex. Without such a meeting, it has proved highly difficult to fully understand the mass of new documents added to the website. After Christmas and before your Planning Committee, we strongly suggest that we still have such a meeting, to avoid misunderstandings and allow us to modify our original position, as necessary. The long and informative meeting we had in Cheltenham with your consultant was excellent and time well spent. Holding another meeting (it does not need to have as many of your experts as you had the last time) so that we can fully understand all your changes would make it more likely that the Planning Committee meeting will have less objections and issues needing further discussion by Committee Members. It should also avoid the need to engage other interested stakeholders, such as MPs. In the interim, we have comments on the following:

## **Highways Improvements**

It looks like improvements have been made to the junction design for Shurdington Road/Kidnappers Lane. Yet these still appear inadequate to deal with the volume of traffic anticipated when the school is built. Having seen the revised Miller proposal for this same junction, now including a roundabout rather than traffic lights, which is the sort of solution that is needed. The school must solve its own traffic problems and we cannot rely on a Miller solution for that junction that may not happen, as the Miller proposal has yet to gain planning permission (which will be controlled by CBC rather than GCC, which may see things differently to GCC).

Our Transport Consultants KM ([BE CEng](#) [MIEI](#) [HDip](#) [Envm](#) [Eng](#) [FConsEI](#)) have made some important points for consideration.

*"As per industry standard, assumptions in terms of the extent of the assessment, traffic modelling and raw data collection, including trip generation, has been agreed/guided by the Local Authority and is covered by the Technical Notes included in the Appendices.*

## **Traffic Generation**

*The traffic generation applied to the new school is based on a very high modal split towards walking and cycling. The report refers to a walking distance of 500m optimum to 2km maximum preferred and a 15-20 min cycle range and the modal split used is based on the post-codes and the use of the National Travel Survey (NTS), recommended to be used by the Local Authority over and above using the travel patterns at the existing Balcarras School. The result is a trip generation of what should be 209 trips (staff and pupils ((based on staff parking proposed)) for the AM peak (08:00-09:00). There is a further assumption*



# Leckhampton with Warden Hill Parish Council

*based on current arrival patterns for Staff at the nearby Balcarras School that more than 50% will arrive before 08:00. This figure of 209 trips is being further reduced based on an anticipated modal shift of 20% in the future (taken as 2026 when the school will be fully operational). This assumption is strongly questioned on the validity with an initial assumed very high child walking/cycling percentage based on current infrastructure. **Could GCC Planning confirm these assumptions have been formally agreed with the Local Authority before being used in the modelling?***

## **Traffic Modelling Results**

*As per industry standard, the Paramics Model has produced a number of Key Performance Indicators (KPI's) referencing with/without development, with development assumes that proposed mitigation measures such as junction improvements are in place. We believe that with the accepted and existing severe levels of traffic congestion near the proposed school site (ref. Inspector Clark's final report, Bovis Miller Appeal) the parish council question the acceptance of the results for reduced Speed, extra Journey Times and Queueing for the AM peak with the combined School and 350 unit development. For 2026 there are important negative impacts recorded to both Residents and Commuters on the junctions analysed, Tables 7.20, 7.23 and 7.26. At some junctions with the heavier traffic flows, speed is reduced by 40%, Journey Times increased by 47% and queueing increased by 30%.*

***In summary the impact is significant for certain junctions based on a highly optimistic traffic generation to the site. If the 'actual' trip generation is worse, the resulting impact could be significantly worse. This was the main concern from the Cheltenham Chamber of Commerce in their earlier assessment on the Bovis Miller development of 650 dwelling in the same location, can GCC Planning clarify from the applicant, what an acceptable impact would be with the proposed mixed development at this location?"***

## **Preliminary Ecological Appraisal & Protected Species Report, GN2019011A, B, C&Dv4**

We have had insufficient time to comment on this latest report but ask you to check that comments from our ecological expert on your earlier interim ecological report (now superseded) are taken into account please:

- ***The Interim Ecology Report, table 4, states that hedgerow 2, which bordering Kidnappers Lane will be retained, 'species rich hedgerow of relatively high ecological value and a 20m section will be removed for access in the development proposals. Due to its species richness, its retention is recommended'. This is not consistent with the application as presented and needs additional work, this concern is mirrored by the GCC Ecology Assessment at para 5, where concerns are expressed on the, 'loss of hedgerows of significant stature and length which are likely to be important wildlife corridors'.***



# Leckhampton with Warden Hill Parish Council

- LWWHPC concur with the GCC Ecology Assessment, Mr Gary Kennison, Principal Ecologist, there is more preparation work to be completed, para 5 & 6, *'the application cannot be determined until the recommended follow up ecological surveys and assessments covering bat roosts, reptile and possible dormouse presence have been completed and submitted within a Final Ecological & Protected Species Report'*.
- LWWHPC recommend that an earlier lighting curfew of 20:00 to 07:00 on the ASTROPITCH to the far south of the site, this is to protect valuable habitat and reduce light and noise disturbance, and subject to review based on future surveys. The Parish Council concur with CBC Planning that this ASTROPITCH should be moved to the north of the site, and masterplanned with the Miller housing development to avoid irreparable damage to wildlife and habitat. This southern side of the site is the most sensitive part from an ecology, landscape and noise disturbance aspects, a rural setting which needs protection, [ref. Annex X and GCC Landscape Assessment para. 5 & 6, concerns and planting recommendations](#).
- LWWHPC request low UV lighting should be used throughout of 2700K to reduce the blue light component level, as recommended by ILP and Bat Conservation Trust, [ref. Annex X section 2.4 Lighting Strategy and section 3](#).
- Biodiversity net gain, the council's independent ecology review of the application has requested that the PEA strengthens the recommendations for provision of biodiversity net gain. This could include restoration of the Traditional Orchard Priority Habitat and the avoidance of ornamental planting, as suggested within the Planting Plan and Schedule, native species would provide genuine benefits to wildlife.
- LWWHPC requests that the habitat area to the NE parallel to Hatherley Brook and flood zone not be fenced to protect the existing wildlife corridor, this is consistent with the masterplan with Miller Homes. This recommendation is also supported by the Ecology Interim Report submitted with the application - [para. 4.1.2. 'The brookside vegetation in the form of trees, shrubs and tall herb serves as a valuable wildlife corridor in the area and the retention of the brook, minimisation of area to be impacted and avoidance of illuminating this area is recommended. It is our understanding that this will be the case. Brooks and streams are a Priority Habitat under the Gloucestershire Biodiversity Action Plan'](#).



# Leckhampton with Warden Hill Parish Council

## Air Quality

The Air Quality Consultation (AQC) response of 8 November has not addressed the substantive points that the Parish Council made in its objection, and makes assertions which are demonstrably incorrect.

AQC have no particulate data from anywhere near Cheltenham at all. Air pollution is highly localised, so without local data, everything is conjecture.

To get around this difficulty, AQC used a model that, when referenced to a single Nitrogen Dioxide reading at one location, was out by a factor of 6. This is why no weight can be given to their conclusions – the assumptions in the model are demonstrably wrong, and applying a correction factor this large, based on one reference reading is completely unscientific.

AQC claim that they have demonstrated that PM2.5 concentrations at the proposed school site are within the WHO guidelines on an annual mean of 10 ug/m<sup>3</sup>; they have not, because they have no local data.

The Parish Council has been collecting PM2.5 data for 21 weeks from a less polluted site in Leckhampton. The average for these 21 weeks – which does not include the main winter months when air pollution is most acute – is **9.55 ug/m<sup>3</sup>**.

We can therefore have a reasonable degree of confidence that the annual mean around busier roads such as Shurdington Road (next to the school), will be well above 10 ug/m<sup>3</sup>, particularly when the winter months are included.

AQC also state in their response: “it is highly unlikely that the 24 hour mean in Leckhampton will be exceeded”. Unfortunately, the data collected over the last 21 weeks (again, we stress that this does not include the winter months) show that the 24 hour WHO threshold of 25ug/m<sup>3</sup> **has already been exceeded on 11 days** in those 21 weeks!

The real data therefore contradicts the conclusions from the conjectural modelling performed by AQC, and the comments made on their response dated 8 November 2019.

A summary of the data collected by the Parish Council is attached. This contains an outline of the methodology and the monitors used. We are happy to provide more detailed information on request.

Chris Nelson  
Chairman  
Leckhampton with Warden Hill Parish Council