



## Leckhampton with Warden Hill Parish Council

For the attention of Sarah Pearse MA BSc MRTPI  
Principal Planning Officer  
Strategic Infrastructure  
Planning - Development Management  
Gloucestershire County Council  
Shire Hall, Westgate Street, Gloucester. GL1 2TH

29<sup>th</sup> June 2020

**Application by Head of Property Services, Gloucestershire County Council for Construction of a new 6 forms of entry secondary school building, with a new all-weather pitch, sports playing fields, a multi-use games area, onsite parking and other associated works at Land Between Farm Lane/Kidnappers Lane Cheltenham Gloucestershire (application no: 19/0058/CHR3MJ)**

Dear Sarah

The High School Leckhampton Application: concerns and risks

We understand that GCC plans shortly to approve the application. As you are aware the Parish Council is concerned about several issues in the application and we believe that GCC has not properly addressed the requirements of the NPPF in respect to valued landscape and may be at risk of legal action by local residents over this. In addition the recent announcement about changes to the catchment area undermines the basis for the previous traffic modelling and suggests that this should be recalculated as it significantly increases the risk of even worse traffic congestion than before.

The Leckhampton Fields are designated as valued landscape by the Secretary of State and fall under NPPF paragraph 170 which states that:

‘Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).’

In the case of the Leckhampton Fields, the development plan is the Gloucester-Cheltenham-Tewkesbury Joint Core Strategy and the Cheltenham Local Plan which is awaiting adoption delayed by the Covid-19 lockdown.

At the 14 May meeting, in answer to a question from Councillor Will Windsor-Clive, you confirmed that you were unaware of the significance of the valued landscape and that there was no mention of the valued landscape in the report by GCC’s landscape consultant or any consideration of the valued landscape in the application documents.



## Leckhampton with Warden Hill Parish Council

The attached paper elaborates on what Cllr. Dr Adrian Mears and Cllr. Martin Horwood said to the GCC Planning Committee at the 14 May meeting and has recommendations on how we think the issues might be addressed. In particular we believe that GCC urgently needs to examine the issue of the valued landscape and produce a clear and deliverable plan to meet the NPPF requirement that it has so far ignored.

We are copying this letter to all the members of the GCC Planning Committee, Simon Harper, Alex Chalk MP, Tracey Crews and John Rowley at CBC, Shurdington Parish Council and the four other Cheltenham Parish Councils.

Yours sincerely

Mrs Penny Henty  
Chairman

**Submission by Leckhampton with Warden Hill Parish Council June 2020  
concerning Gloucester County Council application number 19-0058-CHR3MJ**

**Introduction**

The site for this new school, which is named 'The High School Leckhampton', is located in Leckhampton with Warden Hill Parish and the Parish Council has made several submissions to consultations on the school proposals. The Parish Council has supported the school in principle but has serious concerns about what is actually being proposed, primarily over failure to protect the valued landscape of the Leckhampton Fields in accordance with NPPF para 170, the impact on the ecology and protected species, and the increase in the traffic congestion in the peak morning period. These issues were covered briefly in the speech to the GCC Planning Meeting by Cllr. Dr Adrian Mears on behalf of the Parish Council and on the ecology issues in the speech by Cllr. Martin Horwood, who is a member of Cheltenham Borough Council and also of the Parish Council. The purpose of this document is to elaborate on these points and jointly find solutions.

**Historical background**

The site of the school was previously identified as land for housing as part of the Leckhampton Strategic Allocation in the draft Gloucester-Cheltenham-Tewkesbury Joint Core Strategy (JCS). This proposed strategic allocation, which derived from the revoked 2006 South West Regional Spatial Strategy, was for around 1200 homes of which around 180 were on the GCC land that is the site for the school. Another 650 were on land east of Kidnappers Lane and a further 377 were on land west of Farm Lane that is in Tewkesbury Borough. The application for the 650 homes east of Kidnappers Lane was made by Bovis Homes and Miller Homes in 2013 and was refused by Cheltenham Borough Council in 2014 and subsequently refused on appeal by the Secretary of State in 2016. Importantly, this refusal was made on grounds of valued landscape and severe cumulative traffic congestion both of which are highly relevant to the application for the school. The application for the 377 homes west of Farm Lane was approved by Tewkesbury Borough Council in 2016 and was permitted by the High Court following a judicial review. That development is currently under construction.

In 2015 the Parish Council and Councillor Iain Dobie as the county councillor for Leckhampton and Warden Hill wrote to GCC seeking more secondary school places in the area and recommending that GCC should reserve its land for a playing field for a future secondary school rather than using it for housing. In response GCC repeatedly insisted that there was absolutely no need for a new secondary school in south Cheltenham and gave an option for housing on its land to a developer.

In 2016, the JCS Examiner, Inspector Elizabeth Ord, concluded that the Leckhampton Strategic Allocation was unsound on landscape grounds and recommended that development should be limited to the so-called Northern Fields, which are the part of the Leckhampton Fields bordering the A46 on its south-east side. During the JCS Examination Inspector Ord also at the request of all parties examined a proposal for a Local Green Space (LGS) that was put forward in 2013 by the Parish Council as part of its neighbourhood planning. In her findings she concluded that the proposed LGS was sound. The LGS included the GCC land that is now the site for the new school.

GCC had not raised any potential need for a new secondary school in South Cheltenham in its submissions to the Joint Core Strategy or to the draft Cheltenham Plan. But in 2017, following the rejection by Inspector Ord of any housing on its land, GCC proposed instead to use the site for playing fields for a secondary school for 900 pupil places with the school buildings themselves located in the housing allocation on the Northern Fields north of the GCC land. This proposal was inserted into the draft Cheltenham Plan in December 2017 just before its submission, with a proviso that the extra traffic caused by the school together with the traffic from the new homes proposed on the Northern Fields must not cause severe traffic congestion. The Parish Council agreed to this proposal provided that the playing fields were grass with no floodlighting and that any tennis courts were located on the north of the two GCC fields and concealed from view behind the existing boundary hedgerow between the two fields.

In 2018, GCC changed its mind and decided it wanted to put the whole of the school including the school buildings on its own land. GCC stated that the reason for the change was that it did not have a strong enough case for compulsory purchase of the required land on the Northern Fields and it might also have to pay high compensation given the land was allocated for housing in the draft Cheltenham Plan. CBC and the Parish Council both opposed this change and in its evidence to the examination of the Cheltenham Plan in February 2019 by Inspector Wendy Burden CBC's counsel said that CBC expected that Miller Homes, the developer, would make the necessary land for the school buildings available. At that time GCC and Miller Homes were collaborating and they put a joint proposal to Inspector Burden on the traffic mitigation.

Despite CBC's recommendation, Inspector Burden found in favour of allowing the school buildings to go on the GCC land, although she retained the caveat over the impact on the traffic being acceptable. A factor in her decision was the shortfall in housing supply due to uncertainty over other planned developments in Cheltenham. This caused her to ask for the allocation on the Northern Fields to be increased. Removing the school buildings from the Northern Fields provided space for more homes.

The collaboration between GCC and Miller Homes subsequently broke down and GCC has developed a standalone application for the school that is independent of what is being proposed by Miller Homes. This is suboptimal because it does not make use of the foot and cycle routes to the school proposed by Miller Homes through the Northern Fields. As a result GCC has been forced to promote an alternative footpath and cycle track via the public footpath across Lotts Meadow (subject to agreement by the landowner) and by building a cycle track and footpath along Kidnappers Lane. Currently Kidnappers Lane is a narrow rural lane with protected trees and old hedgerows and is an important component of the valued landscape. It has enough verge space for a footpath but insufficient to accommodate a proper cycle track.

### **Impact on the valued landscape**

As noted earlier, the Leckhampton Fields were designated as valued landscape by the Secretary of State in 2016 in his findings for dismissing the Bovis-Miller appeal. The designation explicitly recognised two special features of the Leckhampton Fields. The first is the intrinsic charm and interest of the diverse old landscape of the fields themselves. The second is their importance to the view from Leckhampton Hill, which is a nationally significant viewpoint, being one of only 28 viewpoints in the whole of England and 47 viewpoints in the whole of Great Britain identified in the 3 miles to the

inch and 4 miles to the inch AA road atlas, the most widely owned map of the sites of tourist interest in Britain (see Annex B).

In the appeal hearings the Parish Council agreed that housing might be acceptable on the Northern Fields because they are well screened from view from Leckhampton Hill. The same conclusion was reached by Inspector Elizabeth Ord in her findings from the JCS Examination in Public in recommending that development should be limited just to the Northern Fields. Inspector Ord also on landscape grounds rejected a proposal from the JCS authorities for a primary school on the Northern Fields or GCC land. This emphasises the landscape difficulty of accommodating a school in the area.

At the GCC Planning Committee Meeting on 14 May 2020 it became clear that in developing the application GCC had been poorly advised by its landscape consultants and had not recognised or considered the requirement to protect the valued landscape even though the planning officer's report to the Planning Committee did quote the relevant paragraph of the 2018 NPPF:

Para 170 Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).

In the meeting the GCC planning officer, relying on the landscape consultant's report, had to admit that she did not know what valued landscape is or its significance. She also confirmed that there was no mention of valued landscape in the application documents. This very important admission seems to have been omitted from the minutes of the meeting but it is included in the Youtube recording of the meeting published by GCC. The transcript of the relevant section from that recording is attached at Annex A.

The serious damage that the school could do to the valued landscape was made very clear when in December 2019 Cheltenham Borough Council withdrew from defending an appeal by Robert Hitchins against the refusal of its application for 25 new homes on the derelict nurseries site east of Kidnappers Lane. CBC had rejected the Robert Hitchins application because of damage to the surrounding valued landscape of Lotts Meadow, Robinswood Field and Kidnappers Lane. CBC withdrew its case mainly because its landscape consultant advised that the new school would so damage the valued landscape that CBC's case was no longer sustainable. Cheltenham's lack of a 5 year land supply was another factor but not the primary one according to CBC's barrister.

The Parish Council has not seen the consultant's report, but a major factor would be the damage to the view from Leckhampton Hill. The school is likely to stick out like a sore thumb because of its unsympathetic modern building design and lack of screening. A second key factor is likely to be the damage to the beauty and rural character of Kidnappers Lane caused by cutting back trees and hedgerows in order to provide the planned cycle track and pedestrian route for students to access the school, as noted earlier. The effect of the school on the landscape west of Kidnappers Lane and on the appearance of Kidnappers Lane north of the GCC site would also be factors.

### **Traffic issues**

In the Secretary of State's refusal of the Bovis-Miller appeal in 2016 the severe cumulative traffic congestion was based on the scale of development proposed at that

time in the draft JCS: about 1200 homes in the proposed Leckhampton Strategic Allocation plus 1500 homes at North Brockworth. The North Brockworth development is currently being built but the development at Leckhampton has been reduced to 377 homes being built on land West of Farm Lane and the 25 to be built by Robert Hitchins on land east of Kidnappers Lane. This is a reduction of 800, which should on the face of it be a sufficient margin to avoid the traffic created by the school leading to severe cumulative congestion. But the Cheltenham and Tewkesbury local plans also include the 350 new homes planned on the Northern Fields and more than 200 new homes at Shurdington. If the school generates too much traffic these developments could be rejected in the same way as the Bovis-Miller application.

In term time, the traffic queue into Cheltenham on the A46 forms by 07:45 and lasts until 09:15 or longer. Therefore, even though the traffic to the school will be limited to the school-run period (the reason that the impact of school traffic is often discounted) it will in this case contribute fully to the length of the traffic queue and to its duration.

As noted earlier, GCC and Miller Homes jointly proposed to Inspector Burden in February 2019 that the traffic caused by the school and by the Miller Homes development could be sufficiently mitigated by increasing the capacity of the traffic light controlled junction of the A46 with Moorend Park Road. It is this junction that generates the very long inbound traffic queue on the A46. The proposed mitigation is to add an additional inbound traffic lane on the A46 at the junction in order to provide separate short left-turning, straight-ahead and right-turning lanes. The A46 itself has just a single carriageway in each direction. But immediately close to the junction there is currently enough road width for two inbound lanes and one outbound lane. Miller Homes are proposing that by narrowing the inbound lanes to 2.7 metres width, removing the central island, narrowing the outbound lane and reducing the pavement width there is just enough space to allow the additional lane. Although the three lanes would only be a few car-lengths long the extra lane might over many traffic light cycles increase the junction throughput sufficiently to cater for the 350 homes on the Northern Fields.

The Parish Council put a similar mitigation proposal to GCC in its response on the school, excepting that the Parish Council proposed increasing the road width by purchasing a strip of land from the front gardens of the houses adjacent to the road. This allowed sufficient space for the proposed cycle track along the A46 to the school and allowed wider lanes given that this is a bus route with buses 2.55 metre wide turning at the junction about every 10 minutes. However, in discussion with the Parish Council about this proposal, Chris Mead, the head of GCC Highways Planning, made the point that very often mitigation measures like these are not effective because improving throughput at one location just leads to higher traffic levels and more congestion elsewhere in the network. He said that Cheltenham already has the worst traffic congestion in Gloucestershire. The queue at the A46/MPR junction has the benefit of limiting the rate of traffic flow into central Cheltenham and it also discourages unnecessary journeys into Cheltenham at the peak time. Long traffic queues can also encourage parents to send children to their nearest school and commuters to work more from home, which is more likely since the Covid-19 lockdown.

The Secretary of State in the findings on the Bovis-Miller appeal took a different position emphasising that people must be able to commute into Cheltenham reasonably easily and that parents must also be able to take children to schools by car. The more traffic the new school generates the less is the scope for more housing. Within Cheltenham

there is virtually no space available for new housing and future housing growth will need to be on the periphery, as in Shurdington and North Brockworth. Brockworth Parish Council is very worried about the impact that the new school could have on the ability of residents in the 1500 new homes at Brockworth to commute into Cheltenham. Shurdington Parish Council, which was excluded from giving evidence to the GCC Planning Committee, is concerned both about the ability to commute into Cheltenham and the impact of the A46 traffic queue on its village which extends for about 1 km along either side of the A46.

The school run has a huge impact on the traffic congestion on the A46 and in Cheltenham. So it is very important to keep the car journeys to the new school to a minimum. The map of the priority area for admissions to the High School in 2021-22 has just been published (June 2020) and changes adversely the basis for the current traffic modelling. The priority area includes the residential areas east of the A46 up to the A40 in the north and as far as Sandy Lane in Charlton Kings in the east, but it does not include any area west of the A46. This means that the main residential areas close to the school in Warden Hill and The Park area are excluded from the priority area and the centre of gravity of the main residential areas for the High School is a mile from the school on the other side of the Leckhampton Fields. Furthermore the priority areas are not served by the number 10 bus route, which was highlighted as one of the advantages of the site and the basis for suggesting that a significant number of students would come to the new school by public transport.

The location of these Leckhampton residential areas east and north-east of the school means that a large portion of the journeys to the school by car will be via the A46/MPR junction. This is the worst scenario for the traffic congestion. One car journey there and back to the school via Moorend Park Road and the A46 adds twice to the length of the A46 queue because it takes up time in the traffic light sequence on the outward journey as well as adding directly to the A46 queue on the return journey. This means that one car journey to the school and back is equivalent to the traffic into Cheltenham on the A46 in the peak period that would be generated from 6.7 new homes in the Northern Fields development. This figure is based on the standard peak morning mobilisation of 0.6 vehicles per household and assumes that the car journeys from the development split evenly inwards and outwards on the A46. It demonstrates how big an effect the school is likely to have in limiting the scope for new housing.

The published priority area for the school is substantially different from the catchment that was used for the traffic modelling. This raises serious questions over whether the GCC Planning Committee has been misinformed and whether the application is consistent with the Cheltenham Plan given the requirement for the impact on traffic to be acceptable. Even with the previous assumptions on the catchment, the modelling was highly optimistic and also relied on achieving a large modal shift.

One saving grace could be to make the school smaller and to tailor the number of pupils to a level that makes the traffic levels acceptable. It is encouraging that the admissions information for 2021-22 states that there will be four forms of entry (120 pupils) rather than six forms of entry (180 pupils). Operating the school with 600 pupils rather than 900 could be a sensible approach. But that raises the question of whether the school should be built with a capacity of 900 pupils given that this adds cost and that the site is too small and constrained for such a large school.

Bournside School has places for 1500 students in years 7 to 11. Adding 900 pupils in the new school would increase the years 7 to 11 places in the two schools by 60%. This again suggests that the High School is too large given that the two schools are so close together - less than half a mile apart boundary to boundary and two thirds of a mile building to building.

### Size of the school

The Department of Education 2014 non-statutory 'Area Guidelines for Mainstream Schools' (Ref 1) gives the following formula for the minimum and maximum recommended playing field area A for a secondary school where N is the number of pupils and the area is in square metres:  $A(\text{min}) = 8880 + 50N$  and  $A(\text{max}) = 11250 + 62.5N$ . The additional site area B required for the school buildings for a secondary school for years 7 to 11 is given by:  $B(\text{min}) = 1050 + 6.3N$  and  $B(\text{max}) = 1270 + 7.1N$ . The table below shows the areas required for a secondary school with six, five and four forms of entry respectively. For 900 pupils the total recommended site area then comes out as 6.1 ha minimum and 7.5 ha maximum with a mean of 6.8 ha.

Forms of entry	Pupil places	Playing field (ha)		Buildings (ha)		Total site area (ha)		
		Min	Max	Min	max	Min	max	mean
6	900	5.39	6.75	0.67	0.77	6.06	7.52	6.79
5	750	4.64	5.81	0.58	0.66	5.22	6.47	5.84
4	600	3.89	4.88	0.48	0.55	4.37	5.43	4.90

The table shows that the area of the GCC site was sufficient for a school of 900 pupils if as originally proposed the school buildings had been located on the Northern Fields. With both the playing fields and buildings on the one site, the area is marginally below the recommended minimum if the site area had been 5.9 ha as originally thought and substantially below the recommended minimum for the actual site area of 5.66 ha. For a school with 5 forms of entry the site area of 5.66 ha would be above the recommended minimum of 5.22 ha. So in moving the school buildings onto the GCC land a reduction to 750 places might be sensible.

A bibliometric analysis (Ref 2) in 2004 of the optimum size for a secondary school showed no overall association between school size and academic achievement in the range from 600 to 2200 pupils. It was based on 31 studies across various OECD countries in the period 1990 to 2004. The analysis found that factors that favoured a smaller school size were that pupils felt more engaged and teachers felt happier with the climate. The main advantage of larger size was found to be that operating costs per pupil were somewhat lower. However because Balcarras School is to manage the school it can be operated essentially as a second campus with the built in cost advantages of a combined size of around 1770 year 7 to 11 places if the new school has 750 pupils.

### Recommendations

**Report and management plan for protecting the valued landscape:** GCC will wish to produce a standalone report specifically examining how the valued landscape can be adequately protected. This must include photomontages to show the school as viewed

from Leckhampton Hill. The application currently contains many artist impressions of how the school looks from its own ground but none showing its impact on the surrounding area. The management plan must be careful and robust so that trees and hedgerow are not cut back by mistake.

**Screening the school buildings and retaining hedgerow across the site:** The stark visibility of the school building is a key issue. It is out of character and unsympathetic in the valued landscape of the Leckhampton Fields. Tall semi-mature trees that are reasonably fast growing and long lived need to be planted sufficiently close to the school buildings to screen them over time. With some adjustment of the site layout the existing hedgerow separating the two fields could be retained and enhanced to provide more screening and possibly reduce the ecological impact.

**Astroturf all-weather pitch.** CBC Planning, the County Ecologist and the Parish Council have objected to the position of the Floodlit Astropitch, and the very negative impact on habitat and the ecology at the most sensitive southern end of the school site. If the school is made smaller or the site layout changed it might be possible to find a better location for this Astropitch within the site. Otherwise the floodlighting should be removed or highly dimmed. The University Astropitch at the Park Site is not floodlit for the same reasons of ecological impact. If the Astroturf pitch is retained in its present location, it should be better screened by adding tall trees in the hedgerow to its south. This might contribute as an ecology offset.

**Sunken way:** The prominent sunken way across the site between the main playing field and the all-weather pitch together with its footpath needs to be preserved as much as possible. The sunken way runs over the Leckhampton Fields from St Peter's Church to Farm Lane and is one of the interesting landscape features that contribute to the valued landscape. Leckhampton in medieval times had three manors and manorial estates that covered a substantial part of Cheltenham and land to the south. The sunken way served two and probably all three of the manors and earliest maps show that in later centuries the section of the sunken way across the site was the local toll road before other roads in the area were built. The manorial estate of Leckhampton Manor dates at least from Saxon times, but the sunken way might possibly be a much older route given the Neolithic roundhouses in its immediate vicinity and the Neolithic fort on Leckhampton Hill.

**Public right of way across the site:** The application proposes permanently closing the public right of way across the site along the ancient sunken way. This proposal has received a great deal of objection from residents and is the subject of a separate public inquiry. Balcarras School wishes the footpath to be closed to make the entire site a single enclosure which would make it easier for them to manage pupil safeguarding. However, the footpath is a key part of the network of circular routes on the Leckhampton Fields that make this such an important recreation area for local people. The Parish Council at one stage suggested that the footpath might be diverted south along Hatherley Brook and then west round the south perimeter of the school. But in view of the ecological sensitivity this no longer appears to be a sensible option. The footpath must therefore be retained roughly on its current route along the sunken way. Adding hedgerows along the path might be a way to protect the privacy of pupils and a hedgerow and grass path that dormice can easily cross would also be advantageous for ecological protection.

**Conserving Kidnappers Lane:** The cycle track and footpath proposed along Kidnappers Lane will severely damage the hedgerows and rural character of the Lane. The cycle track is not in fact needed since the Miller Homes proposal for the housing development provides a very good cycle track to the school via the Smallholdings footpath and the Northern Fields. This route was proposed by the Parish Council in its first submission on the school, which examined various cycle and walking routes. It is already a vehicle track with sufficient width and it is capable of improvement without damaging the valued landscape if done with care. Furthermore, introducing a speed limit of 10mph or 15mph in Kidnappers Lane during the school run period could allow pupils to cycle safely on the lane. The traffic modelling for the school predicts that there will be a queue of up to 42 vehicles in Kidnappers Lane at its junction with the A46 and there is already a solid morning queue all along Church Road from the Leckhampton Road with journey times of 5 minutes or more. So a speed limit of 15 mph or even of 10 mph along Kidnappers Lane would impose little extra journey time compared with the delays in the queues. Gloucestershire Highways has also proposed in discussion with us that pupils could cycle along Church Road in the morning traffic, and if that is safe and acceptable to parents then cycling on Kidnappers Lane would certainly be safe. Thirdly, there is a planning proposal by CBC to extend the existing cycle and running track in Burrows Field all round that field, and this together with the cycle track proposed by Miller Homes could provide a route to the school from Church Road avoiding Kidnappers Lane.

**Conserving hedgerows on the north side of the site:** The hedgerows along Kidnappers Lane north of the site must be conserved with only the small entrance through the hedgerow next to Hatherley Brook for the pupils. Similar requirements have been agreed by Miller Homes in discussion with us for the hedgerow and trees on the Northern Fields side of Kidnappers Lane to be fully conserved and thickened. These are species rich hedgerows of relatively high ecological value. There is currently a proposal to remove a 20 metre section for access to the development and that should be rescinded.

**Environmental Impact:** We understand that the impact on the local ecology, including on protected species, is being covered by further professional work needed to produce an acceptable Environmental Impact Assessment, but we do not know the details of this work. Any ecological offset area east of Hatherley Brook must be designated in perpetuity.

**Conserving trees and habitat along Hatherley Brook:** The trees along Hatherley Brook need to be fully retained and enhanced to screen the school from view from the valued landscape and LGS east of the brook as well as to support the local ecology. If possible the habitat area on the north-east side of the site parallel to Hatherley Brook and its flood zone should be left unfenced to protect the existing wildlife corridor. This is consistent with the masterplan with Miller Homes and with the Gloucestershire Biodiversity Action Plan which identifies brooks and streams as a priority habitat.

**Traffic impact:** The published priority area for admissions has abandoned the aspiration for the new school to have a very localised catchment similar to that of Balcarras School, which has a catchment radius of 0.5 to 0.8 miles. Pupils travelling to the school by car from the more distant parts of the catchment will mainly use the already very congested routes of Charlton Lane / Church Road and Moorend Park Road / A46. This appears to be a substantially worse scenario than the worst case scenario used for the traffic modelling and the traffic modelling needs to be redone for the actual catchment. The

unanswered questions raised by the Parish Council's traffic consultant for the previous modelling (Annex C) need to be answered for the published catchment taking into account also the travel by car to the expanded Leckhampton Primary School in Church Road. The increased junction loadings and delays at all the junctions in the traffic network need to be made public and GCC needs to confirm whether or not it believes they are acceptable.

**Considering the option of a smaller school:** As noted earlier, reducing the size of the school deserves very serious consideration in the context of the traffic congestion and the environmental sensitivity and valued landscape. In principle the school could be built with 900 pupil places but operated with 4 forms of entry or 5 forms of entry. But the extra cost of building an oversized school is not good use of public money. Making the school smaller might also allow adjustments to the site layout that could make it easier to protect the ecology and the valued landscape including retaining all or part of the existing hedgerow between the two fields. Pate's Grammar School has 5 forms of entry and has the highest academic performance in Cheltenham and equals Balcarras in terms of educational performance and Ofsted rating of outstanding (Ref 3). So a school of 750 places would be highly viable.

**Area of priority for admission:** In its second submission on traffic issues the Parish Council pointed out that its traffic surveys showed that in terms of journey time the residential areas east of Pilley Bridge and along the Old Bath Road north of Pilley Bridge that are currently included in the area of priority for the High School have better access by car to Bournside School via the A40 and The Park than they do to the new school via Church Road or Moorend Park Road. An adjustment to the priority areas for admissions between Bournside School and the High School could help to reduce the traffic impact without increasing the traffic congestion at Bournside School on Warden Hill Road.

**Concerns of local parents:** Many local parents have primary school children starting at secondary school in the next two or three years and do not know which school to make their primary preference. We are aware that both Bournside and Balcarras Schools are oversubscribed with first choice applications for September this year and the January 2020 census figures for both schools suggest their current year 7 capacity is nearly full. The build up in pupil numbers can be seen from the number of students in each academic year as shown in the table below (Ref 4). The publication of the admissions information for the High School for 2021-22 and the map of the priority areas has helped to provide clarity but there is still a lot of uncertainty over what will exist when.

School	Census date	Academic years					Total
		7	8	9	10	11	
All Saints Academy	Jan 2020	179	155	129	139	143	745
Balcarras School	Jan 2020	222	199	209	194	194	1018
Cheltenham Bournside	Jan 2020	295	293	259	257	261	1365
Pittville School	Jan 2020	201	177	166	128	135	807
Pates Grammar School	Jan 2020	150	156	147	151	124	728
Total	Jan 2020	1047	980	910	869	857	4663

**Concerns of local residents over parent parking:** Appendix E of the application identifies the nearby Lanes Estate as the parking area for the school. This is a

residential area and play space with narrow roads not suitable for this purpose. Whilst GCC's intent may be to discourage parents from coming to the school by car, what is being proposed is unsafe. The Council recommends that Appendix E is removed and that the policy is to strongly discourage parents from parking near the school and to spell that out clearly to parents when they apply for places at the school. If some limited parking space is required it might be possible to provide this by modest widening of Farm Lane similar to that at Bournside School.

**Risk of Judicial Review:** The judicial review brought against Tewkesbury Borough Council (TBC) by local residents in 2016 over the handling of the application for 377 houses on the land west of Farm Lane was based on TBC's ignoring the preliminary findings of Inspector Ord which firmly rejected allowing development on that site for landscape reasons. That judicial review only failed in the High Court because TBC had permitted the application before Inspector Ord had confirmed her conclusions in her interim findings in 2016, the Court deciding that the preliminary findings had insufficient weight by themselves. There is a close parallel in the present application that GCC has ignored the final findings of both the Secretary of State and Inspector Ord on the valued landscape.

#### **References:**

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4. <https://www.gloucestershire.gov.uk/media/2097874/school-numbers-on-roll-by-ncy-jan20.pdf>

**Annex A:**

**Transcript of the portion of the GCC Planning Committee Proceedings on 14 May 2020 that relates to the issue of the valued landscape**

Councillor Will Windsor-Clive

Well my second question is, carrying on from the question I had about Greenbelt: it was brought up that this is a valued landscape. I have very little understanding of quite what that means but presumably, if you are playing top trumps, Greenbelt comes first, AONB second and then valued landscape and then everything else? I don't quite understand what value valued landscape has, especially as we are about the build on it and be surrounded.

Sarah Pearse

In the landscape adviser's response there is no actual designation on this land, you know, it isn't AONB, it isn't special landscape area, it isn't greenbelt. So there's no formal designation on this land. It was included I believe as part of the original submission for the local LGS area, local green area, but it has now been excluded by the most recent planning inspector on the consideration of the Cheltenham Local Plan. I think valued landscape is something that the inspectors have used to describe when they are viewing the land from the AONB. I don't know. It is not something that was brought up by our landscape architect. He was concerned about the impact from the AONB but I haven't got a definition for what a valued landscape is. Certainly when we consulted the AONB Conservation Board they didn't respond. So I haven't got their contribution to input and each time we got new information we did consult them and ask 'have you any comments' and they didn't comment. So I can't bring that to the table I'm afraid.

Simon Harper (virtual meeting co-ordinator)

OK. Thanks Sarah. Will did you want to come back?

Councillor Will Windsor-Clive

No, that's fine. Thank you very much.

**Annex B: Viewpoints identified in the tourist information in the AA Road Atlas of Great Britain. 28 are in England, 6 in Wales and 13 in Scotland.**

Dunkery Beacon	Exmoor, Somerset
Wellington Monument	Blackdown Hills, Somerset
Bulbarrow Hill	Dorset
Pepperbox Hill	Hants
Bernbridge Down	Isle of Wight
Dunction Hill, South Downs	W Sussex
Epsom Down, North Downs	Surrey
Foel Eryr	Pembrokeshire
Sugar Loaf	Black Mts., Monmouthshire
Portishead	Severn Estuary, N. Somerset
Symonds Yat Rock	Gloucestershire
Robinswood Hill	Gloucestershire
Barrow Wake	Gloucestershire
Leckhampton Hill	Gloucestershire
Barbary Castle	Marlborough Downs, Wiltshire
Magpie Hill	Warwickshire
Wittenham Clumps	Oxfordshire
One Tree Hill	Essex
Town Hill	Powys
Clee Hill	Shropshire
Central Forest Park	C. Stoke
Windmill Hill	Worcestershire
Barr Beacon	Birmingham
Beacon Hill	Leicestershire
South Stack	Anglesey
Great Orme Head	Conwy
Waun-y-Llyn	Flintshire
Mersey View	Cheshire
Werneth Low	Derbyshire
Holme Moss	Peak District, Derbyshire
Hathersage Booths	Peak District, Derbyshire
Highoredishy	Derbyshire
Sutton Bank	Yorkshire Moors, N Yorkshire
Hole of Horcam	Yorkshire Moors, N Yorkshire
Lyle Hill	Inverclyde
Queen's View	E. Dunbartonshire
Cockleroy	W. Lothian
Blackford Hill	Edinburgh
Scott's View	Eildon Hills, Border
Carter Bar	Cheviot Hills, Border
Queen Elizabeth Forest Park	Stirling
Queen's View, Loch Tummel	Perth and Kinross
Blackford Hill	Edinburgh
Bealach-Na-Ba	Highlands
Glen Garry	Highlands
Knockon Cliff	Highlands
Struie Hill	Highlands

## **Annex C Outstanding questions raised by the Parish Council's on the traffic modelling**

The Parish Council in its consultation response of 16 October 2019 raised two important questions on the Traffic Generation and Traffic Modelling Results that have not received an answer and which may require re-addressing in the light of the Priority Area for Admissions to the new High School published in June 2020. The questions come from the Parish Council's Traffic Consultant KM (BE CEng MIEI HDip EnvM Eng FConsEI)

**Question 1** 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 (pupils and staff based on staff parking proposed) for the AM peak (08:00-09:00). There is a further assumption 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 highly questionable given 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?**

**Question 2** As per industry standard, the Paramics Model has produced a number of Key Performance Indicators (KPI's) referencing 'with development' and 'without development'. For 'with development' it is assumed that proposed mitigation measures such as junction improvements are in place. Given the accepted and existing high levels of traffic congestion near the proposed school site, the Parish Council questions the acceptance of the results for reduced Speed, extra Journey Times and Queueing for the AM peak with the combination of the School and the development of 350 homes on the Northern Fields. For 2026 the modelling shows important negative impacts both for residents and commuters for 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%. **Can GCC Planning clarify what the applicant considers to be an acceptable impact from the proposed mixed development at this location in order to assess the impact on local residents?**