

## Leckhampton with Warden Hill Neighbourhood Plan Referendum

### Summary of Representations

This document contains summaries of the representations made in response to the publication of the Leckhampton with Warden Hill Neighbourhood Plan. A Regulation 16 consultation ran from 29 January 2024 to 12 March 2024. Following amendments put forward by the Parish Council, a second Regulation 16 consultation ran from 14 March 2025 to 30 May 2025.

The full representations were submitted to the Examiner for consideration during the Examination of the Leckhampton with Warden Hill Neighbourhood Plan. Full copies of the representations can be viewed via the following link: [Draft Leckhampton with Warden Hill neighbourhood plan | Planning policy | Cheltenham Borough Council](#)

*Table 1: Regulation 16 responses*

<b>Respondent</b>	<b>Summary of Representations</b>
<b>Local resident (Brizen Park)</b>	Requests a new local grocery shop or supermarket at or near Brizen Park to enable walkable access to daily shopping and reduce car journeys, and considers the Kidnappers Lane / A46 junction unsafe, seeking traffic lights or a mini-roundabout to manage 40 mph traffic and increasing school-related traffic.
<b>Local land / property owner (Brizen Park)</b>	Highlights the lack of local grocery provision for Brizen Park residents relative to policy LWH1's 800 metre expectation, noting nearest supermarkets and Co-op stores are around 0.9–1.1 miles away and that recent housing and school development has not been accompanied by new facilities; also raises concerns about speeding on Church Road and requests pavement widening to improve safety for families walking to Leckhampton Primary School.

<b>Local resident (Moorend area)</b>	States that traffic volumes have increased despite policies promoting walking and cycling and proposes designating Leckhampton as a low-traffic neighbourhood by restricting through-traffic on Moorend Road, Moorend Park Road, Moorend Crescent and Hall Road so that non-local traffic is directed to the A46.
<b>Local resident (consultation and car use)</b>	Considers that resident engagement with the plan has been very low relative to the local population and questions how representative the responses and Parish Council are; perceives the Plan as overly focused on walking and cycling and insufficiently addressing car users' needs such as parking, electric vehicle charging and traffic smoothing (e.g. on Church Road); and comments that the volume and complexity of documents make them difficult for most residents to engage with.
<b>Local land / property owner (Kidnappers Lane)</b>	Notes that properties including a children's day nursery on Kidnappers Lane adjacent to Hatherley Brook are not connected to the mains sewer and rely on septic tanks or a treatment plant, which is considered unsatisfactory given surrounding new housing and school development with full sewerage; requests provision of a sewer along Kidnappers Lane to reduce flooding and overflow risk, while indicating overall support for the plan.
<b>Gloucestershire County Council – Lead Local Flood Authority</b>	Requests clarification of the rainfall expectations cited in paragraph 188 and recommends basing design storms on the Flood Estimation Handbook; advises that SuDS design matters in paragraphs 189–190 should refer to the CIRIA SuDS Manual; and notes that for policy LWH7 the LLFA will continue to use Flood Estimation Handbook methods and Environment Agency climate change allowances, with the requirement not to increase flood risk elsewhere already covered by the NPPF.
<b>Local resident (buses, affordable housing and green space)</b>	Comments that bus services, particularly the K and L routes, are too infrequent, finish too early and do not serve Brizen Park and Meadowsweet closely enough to offer a realistic alternative to car use; calls for enforcement of lorry weight restrictions and measures to deter rat-running while maintaining access for residents; considers that proposed housing schemes should deliver a much higher proportion of affordable dwellings and that developers should provide community facilities such as pubs, halls, churches, surgeries and shops before homes are sold; suggests new road access should be from Shurdington Road and Leckhampton Road rather than minor roads such as Church Road and Kidnappers Lane; and argues that larger, poorly drained green spaces are better used for flood management than for development, while expressing overall support for the plan.

<b>Local resident (A46 speed limit)</b>	Proposes reducing the A46 Shurdington Road speed limit through the parish from 40 mph to 30 mph to match adjacent sections through Shurdington and near Bath Road, citing its residential character, proximity to the new High School and increased HGV traffic, and argues that a 30 mph limit would reduce pollution and noise and improve real and perceived safety for walking and cycling.
<b>Cheltenham Borough Council – Flood Risk Officer</b>	Suggests adding to Table 1 that effective flood risk management delivers economic and social benefits and that sustainable or natural flood management schemes can support biodiversity; recommends that the Green Infrastructure section explicitly references flood risk mitigation and promotes SuDS that provide amenity and biodiversity, including retrofit opportunities; considers that broad-brush runoff and storage calculations in the Flood Risk chapter are unnecessary and proposes instead that developers undertake detailed modelling and that rainfall records be better referenced; clarifies the purpose of the 2011 Shurdington Road flood defences and suggests mentioning natural flood management; advises against quoting a fixed climate change uplift in policy LWH7 and instead referring to the latest Environment Agency guidance; proposes allowing contributions to natural flood management schemes; and points out a typo and missing reference to community dialogue in the Basic Conditions Statement table.
<b>Local resident (shops, walking and green space)</b>	States that Leckhampton has lost many local shops and business units to housing and argues that additional services such as a café or takeaway are needed in the centre; notes that Bath Road is about a mile away and that a café linked to the new Co-op or re-use of the former Co-op site would be well used; requests zebra crossings on Church Road and upper Leckhampton Road; objects to development on local green spaces and emphasises retaining trees, hedgerows and wildlife corridors, particularly along Hatherley Brook, for biodiversity and flood mitigation; expresses disappointment at the loss of parts of the Leckhampton Fields, asks for protection of veteran oaks and raises concerns that further development will exacerbate flooding from Hatherley Brook in Warden Hill and downstream at Twigworth.
<b>Cheltenham Dowsing Group (local resident)</b>	Opposes any development on Lott’s Meadow, describing it as a natural water meadow that drains hills and streams towards Shurdington Road and sometimes floods; notes its historic role and remaining water tank; refers to existing sewage infrastructure and reports of occasional untreated discharges to a nearby stream; emphasises its role as a valued informal walking area and last rough green belt land; and warns against building on high water table land while acknowledging the need for homes but not at the expense of damp and flood risk to residents.
<b>Leckhampton Village Hall (Trustees/Committee)</b>	Supports the Neighbourhood Plan and appreciates the Parish Council’s support but states that existing financial support is insufficient to meet maintenance and upgrade needs; requests that plan text explicitly

	recognise the urgent need to upgrade facilities to retain and attract user groups and comply with disability access and safeguarding requirements; and asks that the wide range of exercise and dance activities for all ages provided at the Hall be reflected under community facilities and health and fitness.
<b>SF Planning Ltd</b>	Objects to Policy LWH6, stating it is not consistent with the NPPF because it requires proposals affecting non-designated heritage assets to preserve or enhance them, whereas national policy requires a balanced judgement based on significance and scale of harm; states the policy therefore fails the basic conditions without justification for departure and affects many areas requiring robust justification.
<b>Local resident (traditional orchard)</b>	Identifies an omission from Appendix 2 Green Infrastructure list, highlighting a traditional orchard recorded as a Priority Habitat between Hall Road, Church Road and Leckhampton Road, and requests that this be added to the Green Infrastructure list.
<b>Historic England</b>	No comments to make on the submitted Neighbourhood Plan and confirms that, although it did not receive a Regulation 14 consultation, it would not have provided any different comments.
<b>Cotswolds National Landscape Board</b>	Commends the Parish Council on advancing the Neighbourhood Plan and supports its vision and objectives; notes that parts of the Neighbourhood Area lie within and adjacent to the Cotswolds National Landscape and that the remainder lies within its setting; and emphasises the statutory duty under Section 245 of the Levelling Up and Regeneration Act 2023 for relevant authorities to seek to further the purposes of the National Landscape and to handle development within its setting sensitively to avoid harm to natural beauty.
<b>Gloucestershire County Council – Public Health and Communities</b>	Welcomes the Neighbourhood Plan and supports its focus on protecting and enhancing community facilities, promoting active travel and improving air quality, supporting local businesses, providing housing that meets the needs of an ageing population and addressing fuel poverty, managing flood risk including runoff from Leckhampton Hill, and embedding healthy placemaking through green infrastructure, high-quality design and potential use of tools such as Health Impact Assessments.

<b>National Gas Transmission (via Avison Young)</b>	Confirms that no National Gas Transmission assets are affected by proposed allocations within the Neighbourhood Plan area; provides general guidance on development near high-pressure gas pipelines, including proximity restrictions and consent requirements; and requests continued consultation on future Neighbourhood Plan documents or site-specific proposals that could affect its assets.
<b>National Grid Electricity Transmission (via Avison Young)</b>	Confirms that no National Grid Electricity Transmission assets are affected by proposed allocations within the Neighbourhood Plan area; provides guidance on development near overhead lines and other high-voltage infrastructure, including safety clearances and a general presumption to retain existing lines in situ; and requests continued consultation on future planning documents or site-specific proposals that could affect its assets.
<b>Leckhampton with Warden Hill Parish Council</b>	Supports and defends the vision, objectives and policies of its Neighbourhood Plan but highlights that recent appeal decisions for land north of Church Road and land next to Shurdington Road (Policy MD4) require minor redrafting of Appendix 2 and related text to reflect granted permissions while still protecting remaining green features, habitats and access; notes that both appeal inspectors recognised the wider Leckhampton fields as a valued landscape under the NPPF and that this reinforces Policy LWH5 and the valued landscape evidence; confirms strong support for the designated Local Green Space and cites a recent refusal of development within it as reinforcing its status; and notes that publication of a new draft NPPF will necessitate minor updates such as paragraph renumbering.
<b>National Highways</b>	States that the Neighbourhood Plan's proposed policies are unlikely to lead to development that would have a significant impact on the Strategic Road Network and therefore offers no specific comments, while generally welcoming policies that improve pedestrian and cycle links and safeguard and improve local facilities and services to increase self-containment; notes that these comments do not prejudice future responses on individual applications.
<b>Natural England</b>	Has no specific comments on the draft Neighbourhood Plan; advises the authority to seek appropriate ecological and landscape advice to determine whether a Strategic Environmental Assessment is required, taking account of potential impacts on priority habitats and species, soils, best and most versatile agricultural land, local wildlife sites and landscape character; and refers to its standing advice and national datasets as key sources of information.

<p><b>Pegasus Group – Land East of Kidnappers Lane</b></p>	<p>The Neighbourhood Plan (NP) risks becoming out-of-date once the emerging Strategic Local Plan is adopted and should be paused until strategic housing requirements are known. Notes the NP allocates no housing and conflicts with national policy requiring neighbourhood plans not to restrict planned development. Objects to LWH1’s requirement for large residential sites to be within 800m of a grocery store, stating it is unevidenced, overly restrictive and would undermine viability and sustainable housing delivery, including the recently-approved MD4 scheme. States Policy LWH4 duplicates existing green infrastructure policies (INF3 / CP G12–G13) and serves no purpose. Promotes <i>Land East of Kidnappers Lane</i> as a suitable, available, sustainable and deliverable residential site.</p>
<p><b>Pegasus Group – Land at the Nurseries, Kidnappers Lane</b></p>	<p>NP will quickly become out-of-date without housing allocations and should be delayed until the Strategic Local Plan direction is clearer. Objects to LWH1’s 800m grocery-store requirement as unevidenced and restrictive, and to LWH4 as duplicating adopted GI policy. Highlights that part of <i>The Nurseries</i> already has permission for 13 zero-carbon homes and that the remaining land is suitable, developable and capable of further housing delivery, including affordable housing. Asserts that the Local Green Space designation covering part of the site is unjustified and should be reviewed. Promotes additional allocation at <i>The Nurseries</i> as a sustainable, well-located SME-deliverable housing site.</p>
<p><b>RPS on behalf of Miller Homes</b></p>	<p>States the NP fails the Basic Conditions because Policies LWH2–LWH5 impose unjustified constraints that would restrict development on the MD4 strategic allocation. Argues the NP does not support strategic housing delivery, conflicts with national policy requiring neighbourhood plans not to limit planned development and relies on inadequate landscape evidence. Concludes that key policies should be deleted or substantially redrafted, noting the Secretary of State’s permission for 350 homes confirms no justification for added restrictions.</p>

Table 2: Regulation 16 additional responses

<b>Respondent</b>	<b>Summary of Representations</b>
<b>Local resident</b>	Requests adding Church Road to walking and cycling improvement routes due to narrow pavements, potholes, safety concerns and lack of a safe crossing.
<b>Nursery Rhymes at Peasecroft</b>	States several properties on Kidnappers Lane lack mains sewer connections and rely on septic tanks; requests provision of mains sewer access.
<b>Cotswolds National Landscape</b>	Notifies adoption of the updated Cotswolds National Landscape Management Plan 2025–2030.
<b>Active Gloucestershire</b>	Supports NP aims on health, fitness, active travel and community facilities; suggests explicitly addressing sport and physical activity facilities and aligning with strategic activity priorities.
<b>Local resident</b>	Suggests recognising Bournside and St James’s Schools as key destinations and proposes a new safe walking/cycling route along the former railway boundary.
<b>Gloucestershire Wildlife Trust</b>	Supports updated green infrastructure wording and biodiversity links; supports sensitive development of recently permitted sites; suggests minor expansion of Policy LWH4 to encourage stewardship and monitoring.
<b>Environment Agency</b>	No plan-related comments provided in the file.
<b>Gloucestershire County Council</b>	Recommends measurable accessible housing standards (M4(2), M4(3)); advises updating archaeology and heritage content; welcomes alignment of LWH4–LWH5 with heritage and environment links; no further comments in other service areas.
<b>Historic England</b>	No comments provided in the uploaded document.
<b>Leckhampton with Warden Hill Parish Council</b>	Reaffirms support for the NP; states proposed amendments are minor drafting updates; notes LWH2 and LWH7 changes are clarificatory.
<b>National Highways</b>	States amendments unlikely to impact the Strategic Road Network; no specific comments but welcomes active travel and facility-improving policies.
<b>Natural England</b>	Has no specific comments; advises seeking ecological and landscape advice for SEA screening and refers to standing advice.
<b>Neighbour Comment</b>	Asserts NP should be rejected due to alleged unlawfulness, lack of need, boundary issues, consultation concerns, CIL implications and infrastructure criticisms.