

APPLICATION NO: 13/02174/FUL		OFFICER: Mrs Lucy White	
DATE REGISTERED: 8th January 2014		DATE OF EXPIRY : 5th March 2014	
WARD: Charlton Park		PARISH: CHARLK	
APPLICANT:	CTC (Gloucester) Ltd		
LOCATION:	86 Cirencester Road, Charlton Kings, Cheltenham		
PROPOSAL:	Erection of a new convenience store (A1) with associated parking (following demolition of existing buildings on the site)		

ADDITIONAL REPRESENTATIONS

11 Branch Hill Rise
Charlton Kings
Cheltenham
Gloucestershire
GL53 9HN

Comments: 13th June 2014
Letter attached.

1 Regis Close
Charlton Kings
Cheltenham
Gloucestershire
GL53 8EQ

Comments: 10th June 2014

Following our letter of 15th.November 2013 objecting to the original proposed development of this site, we have now viewed the revised application and our opposition is undiminished.

- 1) As already stated, there is no need for another convenience store in this area. We already have a well-stocked NISA within 100 yards and Budgens and the Coop within half a mile walking distance of the proposed new store.
- 2) Removal of the two takeaways is an improvement, since it removes the certainty of resulting widespread ground litter in surrounding roads and Newcourt Park Green.
- 3) One extra car parking space is derisory, the available 17 spaces will be totally inadequate and will lead to more parking on Cirencester and Newcourt Roads.
- 4) The illustrations for the revised building make it look like a unit on an industrial estate, totally out of keeping with the adjacent green parkland and residential properties.
- 5) The revised delivery plans will still cause traffic problems in Cirencester Road. The lorries will have to stop and wait for the considerable flow of vehicles towards Cheltenham to allow them to cross over into the delivery bay. This is in addition to customers' vehicles attempting to enter and leave the site, which will be using the same piece of tarmac. A difficult and crowded road will become even more so, for vehicles and the many pedestrians, (especially children), using it.
- 6) The suggested noise reductions are laughable, needing as they do the cooperation of all drivers to 'close doors quietly, lower tail lifts quietly, switch off engines and air-conditioning units while waiting and avoid revving engines while moving'. Human nature dictates that this will not take place for very long.

- 7) There is only a finite amount of purchasing power in any given area. A new store will dilute the takings of the existing businesses, and may well cause them to cease trading, meaning a number of job losses, thus negating the benefit of any new jobs created.
- 8) If the site is to be developed, then surely a better use of the plot would be the building of affordable housing, such as was erected just up Cirencester Rd. in Croft Court, on the site of the old Croft Garage.

We hope that you will vote to refuse the application.

Comments: 12th June 2014

Letter attached.

77 Cirencester Road
Charlton Kings
Cheltenham
Gloucestershire
GL53 8DB

Comments: 10th June 2014

I object to the revised plans for 86 Cirencester Road.

I refute the claims made about negligible impact on local shops. Local trade will be adversely affected.

In addition, the combined problems of street parking (as overflow from the provided parking), noise and pollution from deliveries make this proposal unacceptable for the local residents.

147 Cirencester Road
Charlton Kings
Cheltenham
Gloucestershire
GL53 8DB

Comments: 10th June 2014

I strongly object to all proposals for this site.

163 Cirencester Road
Charlton Kings
Cheltenham
Gloucestershire
GL53 8DB

Comments: 10th June 2014

I strongly object to the erection of the proposed convenience store at 86 Cirencester Road, I have lived directly opposite this proposed development site for the last 30 years and therefore have first hand experience of the traffic congestion, dangers of the road and parking problems in the area, which have increased dramatically over the years. The A435 is a very busy and over burdened trunk road, especially at peak times, the addition of a convenience store on to this unsuitable site will do nothing more than exasperate the current traffic and parking problems in the area.

1. Damage to local Business

There is little or no need for the addition of another convenience store in this area, we already have ample to serve the local community (Nisa, Co op, Budgens etc) another will only damage our established local small businesses who serve us well.

Also the carwash provides a great service for the local community and will be sadly missed by many, not to mention the employees loosing their jobs.

2. Traffic & parking problems

More unwanted traffic will be attracted into the area, delivery lorries obstructing the highway and vehicles pulling out will also increase the risk of accidents to both pedestrians and drivers.

Parking is already a big problem here and the proposed development provides insufficient parking for both staff and customers, this will lead to more street parking leaving residents with even less or no parking.

3. Better use of the site

There is a shortage of housing in the area, the site would better lend itself to residential housing which would not significantly increase traffic problems or damage local shops or the environment.

4. This development is unwanted

This proposed development is unwanted by a very large percentage of people who live in the area, I only hope the Council take note and reject this planning application.

4 Bafford Lane
Cheltenham
Gloucestershire
GL53 8DL

Comments: 10th June 2014
Letter attached.

The Coach House
6 Bafford Lane
Cheltenham
Gloucestershire
GL53 8DL

Comments: 10th June 2014

We have reviewed the revised planning application for the car wash site on Cirencester Road and are disappointed to see that it does little to address the main concerns raised in our letter of objection submitted in February.

We note that the two food outlets have been removed, but the fact remains that there is no need for such an outlet (and the applicant's examples of co-op/petrol station and convenience store/Boozebuster as being examples of convenience stores thriving close to each other are ludicrous) in this area. The Nisa store would be at risk leaving an unsightly unoccupied retail outlet on the main approach to the town - this surely cannot be considered to be sustainable development nor can it be in the interests of the community.

All our other objections remain. Indeed the rear of the property would be more exposed to the rear with little or no landscaping presenting very unsightly aspect on the corner of Bafford Lane. The photograph below shows how it looked this morning, presenting both an effective screening of the site and an attractive leafy look to the first part of Newcourt Road leading to the Common.

We thank the Council for its actions thus far regarding this application and trust that our councillors on the Planning Committee will act to reflect the wishes of their constituents.

NOTE: Photo attached.

115 Cirencester Road
Charlton Kings
Cheltenham
Gloucestershire
GL53 8DB

Comments: 10th June 2014

My previously submitted concerns have not been resolved. I would refer you to my previously submitted comments. I would like to reiterate the need for housing as opposed to a convenience store development which is not needed.

41 Lyefield Road West
Charlton Kings
Cheltenham
Gloucestershire
GL53 8EZ

Comments: 11th June 2014

I am writing to put forward my concerns in regards to the revised proposal for the development of 86 Cirencester Road. This is a matter that I feel very strongly about. I am the Sub-postmaster of Charlton Kings Post Office and the proprietor of Smith and Mann convenience store.

- 1) Firstly, I would like to address some of the comments made in the reports by Mango entitled 'Retail Statement'. Mango were employed by County to County Construction to put together this report as part of their planning applications. In this report a few key assertions are made that I would like to highlight as I do not feel that they are accurate nor do they reflect a clear representation of the impact of this proposed development.

The first of these assertions is that the proposed convenience store would have an annual turnover of £1.51 million pounds (Paragraph 6, sub-section 19) as a worst case scenario. I believe this to be a gross underestimate based upon the research I have done. Looking at the average revenue generated by the national food retailers per square foot, a store of the proposed size would be much more likely to have a turnover of between £2.5-£3 millions. This is supported by the report submitted by the DPDS which suggests the turnover is more likely to be around £2.35 million. The report also states There must be considerable uncertainty about the turnover that the proposal would achieve.

As a result of the turnover figure provided by Mango, it is the report's conclusion that my store on the Lyefield Road West will only be marginally affected by the proposed development which I completely disagree with. There simply isn't enough business in the Charlton Kings area to keep the four existing convenience stores, plus a new store with a turnover of this size, in business. If I am to see between a 15-20% drop in my business as a result of this development I will not be able to keep my doors open. I will be forced to close my convenience store, which in my opinion, offers key facilities in the Charlton Kings community. My business' are family run and provide a personal and friendly service. These are the qualities that help to shape our community and if we were forced to close the very identity that our community prides itself on will be slowly chipped away at.

- 2) I'd also like to add that my business' currently employ approximately 20 members of staff, many of whom are residents of the Charlton Kings community. If we suffer a loss in

business, or are forced to close, the people I employ would be directly affected. If both the Co-op stores and the Nisa store were affected in a similar way, the number of job losses and employees affected would rise beyond this.

- 3) Moving on, I would like to address Mango's letter dated the 12th May of stores co-existing together in similar scenarios across Cheltenham. The main example that I would like to draw on is in regards to the Tesco store on 214 Hewlett Road and the Bargain Booze at 216 and 218 Hewlett Road. Not too long ago 214 Hewlett Road was a furniture store and Bargain Booze was a family run Premier Convenience Store. Also located in this neighbourhood centre was a thriving butchery and a busy greengrocers. However, this centre now only comprises of the Tesco express, Bargain Booze and 3 takeaways. This is a classic demonstration of how difficult it is for independent retailers to survive when faced with the competition of national retailers. The landscape of this community centre is completely different, and it no longer has the same feel or identity that it did previously. Therefore, I do not see how this can be used as an example of stores co-existing. The area has been changed irreparable and I feel that it is a well justified fear of mine that this will happen in Charlton Kings.

Another example given by Mango is in regards to the recently opened Morrison's Local Store which has opened on 116 Prestbury Road. The BP garage and convenience store at 80-86 Prestbury Road was actually a Londis Convenience Store before Morrisons opened. As a Londis store, it experienced a huge reduction in turnover and sold out to BP. The new plan for this site, as far as we are aware, is for an M&S Simply food to open. This is what I have been informed by the staff working in the store as BP who have now partnered up with Marks and Spencers. This is not an example of store co-existing.

- 4) The next point I would like to discuss is about the idyllic pictures that have been submitted by the architectural firm Daniel Hurd Associates. Looking at the pictures and plans, all deliveries will be made through the front of the store as there is no back entrance. My understanding of why this is the case is because this is the only way the store can also accommodate a car park. The loading and unloading bay has been squeezed on to the front of the store. I would like to draw your attention to the photographs that I have attached of the Tesco Express located by Cheltenham train station. This store also has its deliveries brought through the front of the store. As you can see, a number of empty cages and cages full of waste are lined up outside the store and along the pedestrianised area within the car park. You'll also note that there are a number of cars parked on double yellow lines on the road outside, a car parked on the pedestrian walkway, and another car waiting in the entrance for a car parking space to become available. This is a terrible eyesore and potentially very dangerous situation as people try to make their way into the store and along the walk ways. Its an accident waiting to happen and there is no reason to believe it would be any different at the proposed site on the Cirencester Road.

I would like to conclude by saying that to me these are the most prominent issues regarding this proposal, however there are a number of other valid concerns and potential problems which other members of the public have already raised. Charlton Kings is a strong community area and I can only hope that due consideration is given to how this development would drastically affect and change community life.

NOTE: Supporting Photos available on the documents tab

7 Branch Hill Rise
Charlton Kings
Cheltenham
Gloucestershire
GL53 9HN

Comments: 10th June 2014

I find it hard to believe that I need to write about such a ridiculous plan.

1. I am a cyclist and it is already dangerous passing the end of Newcourt Rd. and the Car Wash. With cars often parked on the opposite side of the road, huge delivery lorries would be a nightmare for a cyclist, as well as lots of 'in and out' cars.
2. There is a 'Nica' shop almost opposite which not only will suffer but the combination will make the road even more dangerous for cyclists.
3. Need - we don't need another shop. We need cottages like those opposite the end of Croft Rd. They fit into the area and are affordable.
4. The car wash is a great success and with some investment could improve in appearance and could continue to serve Charlton Kings and surrounding area.
5. Last but very important - the shops we have serve us very well and will suffer greatly and may go under if the business is spread wider. We do not need any more shops or food outlets.

52 Copt Elm Road
Charlton Kings
Cheltenham
Gloucestershire
GL53 8AL

Comments: 10th June 2014

I strongly object to this application on the following grounds:

1. There is no need for another convenience store. We are well served by the four we already have nearby, whose viability would be threatened by this, as would the future of several other smaller shops in the area. These give the centre of our 'village' character, vitality and a feeling of community.
2. It would be dangerous to have so much additional traffic including delivery lorries entering and exiting this site. This is a residential area, much used and crossed by pedestrians, often mothers with babies, toddlers and schoolchildren and also schoolchildren crossing on their own.
3. There is already congestion on this road at busy periods - it does not take much to cause a hold-up especially where there are parked cars and large lorries trying to come through. The potential increase in both of these could cause real traffic chaos and frustration.
4. There would be an unacceptable increase in noise and pollution levels to many of the people living nearby.
5. There is a greater need in Charlton Kings for affordable housing, which would seem a far more appropriate use of this site, especially given the shortage of available land for housing development. It seems crazy even to consider wasting the potential of this site on another store which nobody wants.

I urge the Council to listen to the heartfelt and realistic views of the people who live here and to turn down this application.

1 Inglecote Close
Cheltenham
Gloucestershire
GL52 6UR

Comments: 13th June 2014

I have been living in Charlton Kings for more than 23 years and during this time I have seen the demise of many businesses particularly financial related ones, all of which keep tugging at the heart of the community.

With regards to this development I am abhorred by the decision to allow this site to become another convenience store. We have 4 convenience stores in the area and another one will only take business away from all of them. Not to mention the Flower Shop, Lyefield Road Pharmacy, the butchers and other small businesses in the village area who will seriously lose out.

The great service currently being provided on this site will obviously disappear. The NISA store beside the site will probably be wiped out completely. The family run Smith & Mann store which provides a great service to the community and incorporates the Post Office will seriously lose out and will put this business in jeopardy. The Co-Ops again will lose out and all will no doubt mean a serious loss of jobs, the majority of these jobs are currently filled by local people from the community.

The traffic situation in this area is already contentious and the increased volume of cars and delivery trucks will greatly add to the congestion and pollution. Not to mention, as has happened in recent months, when there is a traffic problem at the Air Balloon the whole of Charlton Kings comes to a standstill. Customers using the proposed ATM will certainly not use the car park, NO they will just stop by the roadside. I feel very sorry for the households in the immediate area who will suffer from the extra noise, pollution and access.

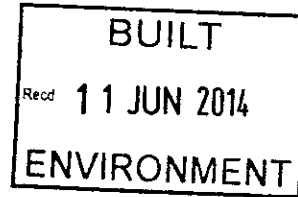
This will be a very costly process if this proposal goes through, with the loss of the heart of the community. We do not need a major player in this area please let the small businesses survive in these very difficult trading times, as proven in many other areas. There is a serious lack of affordable housing in this area which would be more appropriate at this time.

re - 13/02174 FUL.
86 Cirencester Road.

11 Branch Hill Rise,
Charlton Kings.
GL53 9HN.

09.06.14

The Planning Dept.,
Cheltenham Borough Council,
Municipal Offices,
The Promenade,
Cheltenham.



Dear Sirs/Madams,

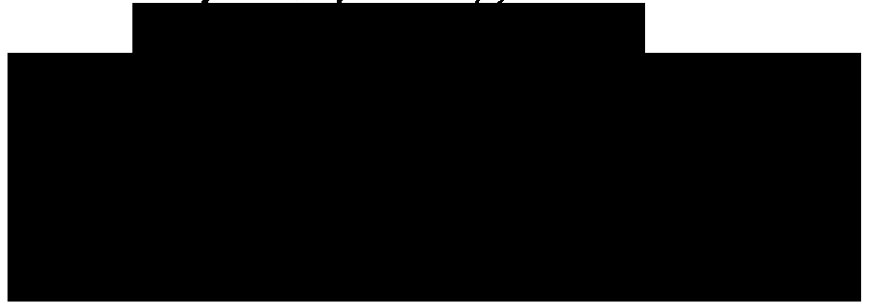
I object to the proposal for a supermarket on the current car-wash site for four main reasons. Firstly, I am concerned about the increase in traffic, both mobile and stationary. Customers would probably park along the main Cirencester Road and down side roads such as Newcourt Road, Bafford Lane and Pumpkneys Close. There would also be delivery lorries and shoppers' cars turning across the moving traffic on the main road.

Secondly, supermarkets offer undercut the prices of similar goods in the local shops, which at present are individual and well-used. These would then lose custom and

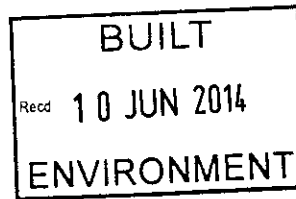
as they are needed in Charlton Kings,
than a totally unnecessary supermarket.

This plan would spoil one of the
main approaches to the Town, and turn
a green and pleasant recreational
area and residential neighbourhood into
an unsightly mess.

Yours faithfully,

A large black rectangular redaction box covering the signature and any text below it.

1, Regis Close,
Charlton Kings,
Cheltenham,
Glos. GL53 8EQ
10th.June,2014.



Head of Planning,
Cheltenham Borough Council.

Dear Madam,

Re: Planning application ref. no. 13/02174/FUL.

Following our letter of 15th. November 2013 objecting to the original proposed development of this Cirencester Road site, we have now viewed the revised application and our opposition is undiminished.

1.As already stated, there is no need for another convenience store in this area. We already have a well-stocked NISA within 100 yards, and Budgens and the Coop within half a mile walking distance from the proposed store.

2. Removal of the two takeaways is an improvement, since it removes the certainty of resulting widespread ground litter in the surrounding roads and Newcourt Park Green.

3. One extra car parking space is derisory, - the available 17 spaces will be totally inadequate for staff and customers, and will result in more parking on Cirencester and Newcourt Roads.

4. The illustrations for the revised building look like a unit on an industrial estate , totally out of keeping with the adjacent green parkland and residential properties.

5. The revised delivery plans will still cause traffic problems in Cirencester Road. The lorries will have to stop and wait for the considerable flow of vehicles towards Cheltenham to allow them to cross over into the delivery bay. This is in addition to customers' vehicles attempting to enter and leave the site using the same piece of tarmac. A difficult and crowded road will become even more so for the many vehicles and pedestrians, (especially children), using it.

6. The suggested noise reductions are laughable, needing as they do the cooperation of all delivery drivers to 'close doors quietly, lower tail lifts quietly, switch off engines and air-conditioning units while waiting and avoid revving

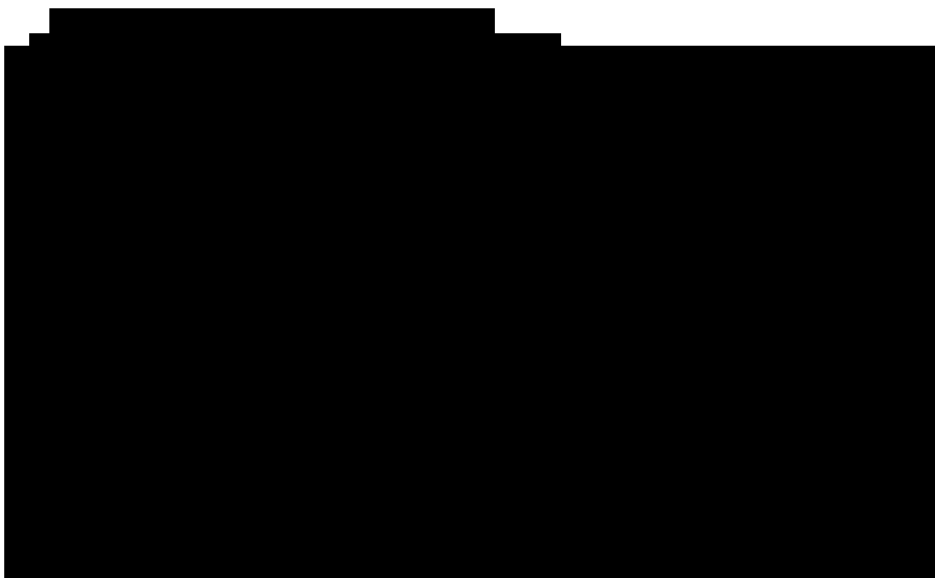
engines when moving'. Human nature dictates that this will not take place for very long.

7. There is only a finite amount of purchasing power in any given area. A new store will dilute the takings of the existing businesses, and may well cause them to cease trading, thus negating the benefit of any new jobs created.

8. If the site is to be developed, then surely a better use of the plot would be the building of affordable housing, such as was erected just up Cirencester Road in Croft Court, on the site of the old Croft Garage. We realise that this comment falls outside the remit of this application, but it would be a way of making much better use of the site to provide something for which there is apparently great demand and short supply at the moment.

We hope that our opposition and comments are noted by the Planning Committee.

Yours faithfully,

A large black rectangular redaction box covers the signature and name of the sender. The redaction is complete, obscuring all text in this area.

Bafford Croft
4 Bafford Lane
Charlton Kings
Cheltenham
GL53 8DL

10 June 2014

Dear Mrs White

Planning application 13/02174/FUL

Thank you for notifying us of the revisions to the above planning application.

Our objections to the proposed development are set out below.

Summary

The planning proposal fails to identify a need for more capacity in the area, and the proposed development is very likely to have a significant and detrimental impact on existing convenience stores.

Retail statement

Para 1.3 of the retail statement states "*It has been prepared in the context of the Joint Core Strategy Retail Study prepared by DPDS Limited in December 2011 ("The DPDS Study").*"

However, two very relevant parts of that study have been ignored.

- para A16 of the supplement recommends that when considering the effect of a proposed development on local centres, the relevant threshold for assessing impact should be 200sq.m. The retail statement does have a brief impact assessment (section 6), but it is superficial.
- Appendix D to the study concludes that Cheltenham already has an oversupply of convenience shopping. It anticipates no requirement for additional capacity until at least 2031.

Para 6.10 states that the NISA store does not appear as an individual entry in the household survey data of the DPDS study as a top up. It claims this as evidence that further top up provision is needed in the area.

However the household survey conducted by DPDS was not designed to identify top up provision across all of Cheltenham, but was specifically targeted at the city centre and three large local centres (Bath Rd., Coronation Sq. and Caernarvon Rd.). It consulted a total of 100 households in all of Cheltenham. The response figures for top up food shopping include 6 for Charlton Kings Coop (London Rd), and 9 for "Charlton Kings" which can be taken to comprise the other Charlton Kings convenience food stores.

The fact that NISA or other Charlton Kings convenience stores exist and appear to be trading successfully (see para 6.24 which estimates the NISA turnover at £650,000-£750,000 p.a.) is evidence enough that they are used.

The retail statement makes no attempt to estimate the total top up expenditure locally, so its claim (paras 3.7 and 6.14) that the majority of top up spending is directed to larger stores further afield has no data to support it.

Para 3.5 describes the range of goods that it is proposed will be offered *“A store of this size and character would typically offer a basic range of convenience goods such as groceries, sandwiches, snacks and confectionery. Non-food goods would comprise no more than 10% of the proposed floorspace and would typically be limited to toiletries, nappies and other ‘essential’ goods.”*

There is no mention here of alcoholic beverages or tobacco and nicotine products. Late-opening convenience stores across the country have extensive provision for the sale of such goods. The retail statement criticises the NISA offering in para 3.7 *“The Nisa unit appears to cater more for small basket and occasional purchases rather than providing a full top-up shopping outlet.”* and again in para 6.9 *“...the store continues to have a relatively limited offer, particularly in terms of fresh fruit and vegetables, fresh meat and other perishable goods.”* However the proposed store makes no claim to be offer anything other than what is already on offer in NISA.

Para 3.10 claims that the proposed store will offer *“between 20 and 30 full and part time positions for local people”*. No evidence is presented for this figure. The only citations (e.g. Tesco in Quedgley) indicate 15 positions. Given the oversupply of convenience capacity in Cheltenham as a whole identified by the DPDS study, it is doubtful if many of the jobs created would be genuinely new jobs, they would likely be at least partially compensated by redundancies elsewhere.

Impact and Sequential assessment

The retail statement has what it calls a sequential assessment (section 5) which is fundamentally flawed. A sequential assessment is relevant in the context of a defined centre or local centres, and is intended to test whether the demonstrated need could best be served in existing centres.

The planning proposal fails to demonstrate any need for additional convenience capacity either in Cheltenham as a whole or in Charlton Kings. The executive summary states *“... the accompanying Retail Statement suitably demonstrates that there is a need for a retail use in this location and that it will not have a negative impact on the existing neighbourhood centres.”* Yet the only part of the retail statement that addresses need is in paras 3.7-3.9 which claim an increase of choice by comparison (solely) with NISA at Cirencester/Croft Rd and ignoring two other neighbourhood stores at Lyefield Rd and Church St. The retail statement indeed makes a point (in para 4.17) of stating that there is no requirement to define a need.

The sequential assessment that they do make is based on the assertion that there is an established need for new capacity in the Cirencester Rd area, and also treats the proposed location as an edge of centre location based on proximity to Cirencester Rd/Croft Rd shops. But as the retail statement itself points out (para 4.18) *“Small*

parades of shops of purely neighbourhood significance are not regarded as centres for the purposes of this policy statement.” The only nearby candidates for local centres according to this definition are the Lyefield Road and Church St centres, which lie 600m (by road or foot) away.

Para 5.13 restricts consideration to a catchment within 500m walking distance of the application site. This figure appears to be chosen so as to exclude the two existing local centres at Lyefield Rd and Church St, each of which is at 600m (less than 400m as the crow flies).

Para 5.14 seeks to justify this by reference to a previous appeal, however in that case the relevant distances were significantly greater at 1.2 km and 1.6 km.

Para 6.21-6.23 present some figures for the source of customers. They assert that 80% of custom will come from shopping which would otherwise have taken place at supermarkets much further afield, and only 20% from existing local shops. There is no evidence presented to justify these proportions.

An alternative estimate would start by looking at the total expected expenditure on top up shopping.

Industry estimates have around 25% - 30% of total convenience expenditure as top up.

Cheltenham convenience shopping is estimated (2014 figures taken from Table 2a of the DPDS Study, Appendix D) at £1,953/head. Taking the population of Charlton Kings to be 10,000 (2011 census, including the area north of London Rd) this gives an estimate of annual top up expenditure to be

$$30\% \times £1,953 \times 10,000 = £5.86M$$

Using the sales density figure from para 6.17 of the retail study of £4,500 per sq. m. gives a total need in Charlton Kings of

$$£5.86M / £4,500 = 1300 \text{ sq. m.}$$

Note that if we use higher estimates of sales density then the required need for sales area is correspondingly lower. According to Table 9 of Appendix D to the DPDS Study, the Charlton Kings Coop (London Rd) has a sales density of £7,600/sq.m. Using this higher sales density gives a total sales area need of

$$£5.86M / £7,600 = 771 \text{ sq.m.}$$

The inclusion of the area north of London Rd, much of whose population may well use Tesco Express on Hewlett Rd or Sainsburys on Priors Rd for their top up shopping means that these figures are likely to significantly overestimate the need for top up shopping south of London Rd.

According to the Valuation Office Agency’s website, the existing stores have sales areas as follows:

Coop (London Rd)	314 sq.m.
Coop (Church St)	369 sq.m.

Budgens	117 sq.m.
NISA (revised)	131 sq.m.

The total is 931 sq.m.

In the context of this existing adequate provision, the proposed new convenience store of 280 sq.m will have a significant impact on the viability of existing smaller stores nearby (Budgen and NISA) as well as drawing trade from the Church St Coop.

Site proposals

The original proposal included a large “totem”. We note that this part of the design has been altered, as have some of the architectural features of the proposed buildings. The design has clearly been altered to take into account the concerns of residents and be a little more sympathetic to the surrounding buildings; however it is completely generic with no form of supermarket branding and it seems unlikely that it could survive like this.

Traffic

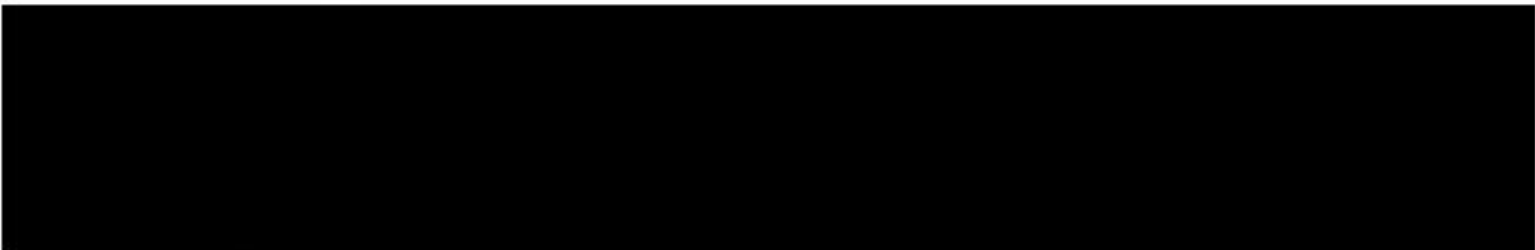
The planning proposal (para 2.2) refers to “*very intensive use*” and “*a steady stream of traffic entering the site*” with the existing use as a car wash. The car wash only operates during daylight hours, it is not a 7am-11pm facility. The proposed use as a convenience store would have delivery lorries arriving in the early morning before store opening.

Closure of the car wash would not reduce traffic levels overall as cars would have to find an alternative, most likely more distant, facility.

Additionally there would be a significantly increased risk of traffic accidents due to more people crossing the main road on what is already a difficult and dangerous bend for pedestrians. The population densities of the immediately surrounding areas are such that the majority of customers arriving on foot will be from the north-east side of Cirencester Road and so will have to cross the road twice.

The portion of Cirencester Road between Croft Road and Moorend Park Road/Lyefield Road already suffers from cars parked part-way on the pavement which both obstructs the footway and makes it more difficult to get a clear sight while crossing. This development would inevitably lead to additional illegal short-term parking in the area close to the shop, including the hazardous corner where Newcourt Road meets Bafford Lane.

Yours sincerely



William Deans

Geraldine Deans

