

APPLICATION NO: 20/01069/OUT	OFFICER: Mrs Lucy White
DATE REGISTERED: 16th July 2020	DATE OF EXPIRY : 5th November 2020
WARD: Battledown	PARISH: CHARLK
APPLICANT:	Robert Hitchins Limited
LOCATION:	Oakley Farm Priors Road Cheltenham
PROPOSAL:	Outline application for development comprising of up to 250 residential dwellings including provision of associated infrastructure, ancillary facilities, open space and landscaping, demolition of existing buildings and formation of new vehicular access from Harp Hill. All matters reserved except for means of access to site from Harp Hill.

ADDITIONAL REPRESENTATIONS

April - May 2021

27 Slad Way,
Cheltenham,
Gloucestershire
GL52 5FA

Comments: 28th April 2020

Whilst I understand the need for more housing, I have substantial concerns regarding the proposed Oakley Farm development, namely...

- 1) As others have mentioned, the traffic in the area, particularly through the Harp Hill round-a-bout would be adversely affected resulting in a rise in air pollution, noise, and congestion. Building extra house should not be carried out at the expense of everyone else in the area - road upgrades should be mandated to handle the extra traffic if such plans are approved
- 2) Complete lack of local infrastructure. There is a single Sainbury's within walking distance of the Oakley Grange and Harp Hill communities. It is completely inappropriate to approve further housing without requiring additional services such as a post office, dry cleaners, key cutting, cafes or pubs, etc. It is well established that healthy communities require a 'high street' which this entire Battledown area lacks, and further housing will simply exacerbate the problem, requiring people to drive to access services, hence worsening traffic and all that goes along with it.
- 3) AONB. The proposed development flies in the face of supposed AONB protection. What is the point of protecting our natural environment if it can have housing built over it? I believe it is a serious moral violation to even consider it.
- 4) There is existing underutilized 'brown site' areas in and around Cheltenham, so there seems little justification for cancelling AONB protection.

- 5) Small housing stock. The existing two GCHQ developments behind Sainsbury are already too congested, with small and narrow roads, insufficient parking and poor access to the Oakley Grange site at the rear. The houses are all small (typically less than 130 sq m) and I do not believe another batch of even smaller homes are required - the plans show predominantly terraces. The result will be a large paved vs green space area with, as far as I can see, no provision for storm water storage and release systems to deal with climate change induced worsening intense rain fall, leading to an increased risk of flooding to all housing further down Harp Hill. Please just stop building low quality, cheap housing!

So in summary, I object to the development based upon the impact it will have on the local area with apparently zero requirement to build or fund local infrastructure improvements to better the environment for existing residents.

Ham Hill South Farm
Ham Road
Charlton Kings
Cheltenham
Gloucestershire
GL54 4EZ

Comments: 28th April 2020

250 houses would generate at least in excess of 500 more regular car users on an already congested 'rat run'. This proposed development would be a scar on the landscape and have a devastating ecological effect on wildlife and locals who enjoy this critically endangered green space!

12 Fossebridge Place
Cheltenham
Gloucestershire
GL52 5BW

Comments: 28th April 2020

- 1) The Battledown / Oakley Grange / Eden Villa estates were built on brownfield land, having previously been the site of GCHQ. The land in question is unspoilt - a fragile and ecodiverse patch of green surrounded by densely built housing. Building houses on it would be appalling and tragic.
- 2) Surface water runoff; the double mini-roundabout at the bottom of Harp Hill already floods easily. Building on the farmland would increase this problem (regardless of the mitigating works proposed, such works would never be able to rebalance lost rainwater catchment)
- 3) Traffic on B4075 is already a huge problem, as I experience daily. Adding so many extra cars to such a densely populated area would
 - a) cause yet more traffic on roads that are already struggling to meet demand
 - b) cause an increase in air pollution for those living on/near B4075

- c) cause more flooding on double mini roundabout on B4075 (as mentioned above)

4) Most importantly, the area is an AONB!

Helix Transport

On behalf of Cleevesyde and Half Acre, Harp Hill

Comments: 8th May 2020

Letter attached.

Helix Transport Consultants
16 Springfield Court
Stonehouse
Gloucestershire
GL10 2JF

Lucy White
Cheltenham Borough Council
Planning Department
Municipal Offices
Promenade
Cheltenham
Gloucestershire
GL50 9SA

By e-mail: Lucy.White@cheltenham.gov.uk

6 May 2021

Dear Ms White,

**Proposed Housing at Oakley Farm, Cheltenham
Comments on Planning Application 20/01069/OUT, concerning Transportation Matters.**

Helix Transport Consultants Ltd are appointed by [REDACTED] at Cleevesyde and [REDACTED] at Half Acre on Harp Hill, to review the latest traffic and transport information submitted by the applicant in relation to the proposed development of 250 dwellings on the former Oakley Farm site in Cheltenham; planning application ref: 20/01069/OUT.

It is noted that the local highway authority has raised major concerns with the latest assessment method and outcome, which are shared.

This letter reiterates the concerns raised in my letter dated 11 September 2020, which have yet to be addressed by the applicant, and provides further information pertinent to the highway authority's current concern over geometry, as follows:

Trip Generation & Distribution

The trip generation modelling / distribution should be considered overly simplistic as it is based on journey to work information recorded 10 years ago. As confirmed by the Department for Transport's National Travel Survey, a relatively small proportion (up to 32%) of trips made during the peak hours are for work purposes. The bulk of trips made during peak times will likely involve more local trips for which the proximity of amenities and non-car access opportunities are highly significant.

Non-Car Access Opportunities

The highway authority has raised concern, and the applicant has accepted, that the majority of the site lies beyond the recommended 400m walk catchment to a local bus service.

The proposals, therefore, fails to achieve the conspicuousness or ease of access to busses that the guidelines aim to achieve.

The highway authority has also raised concerns over the proposed pedestrian and cycle link to Priors Lane; specifically, the geometry and its resultant safety to users.

I share the above concerns and also, as highlighted in my letter dated 11 September 2020, believe that the lack of natural surveillance is a major flaw in the pedestrian accessibility strategy that is in danger of being overlooked. The problem with the current strategy is that it is based on using paths closed-in by vegetation or accesses with no natural surveillance which, particularly in the case of lone worker returning home in the winter months when it is dark, will present a major disincentive to the use of sustainable travel options.

The developer might, although hasn't, suggest that cutting down the trees/shrubs that create hiding spaces and introducing a CCTV surveillance system as mitigation. Even with these measures, there are areas clearly identifiable on the proposed masterplan where there will be no natural surveillance and/or are too far away for any observer to offer timely assistance.

In terms of trip attractors, with the exception of the local Sainsbury's supermarket, the site is somewhat remote from local services or employment opportunities. It is considered that, if due consideration were given to the specifics of the site, in terms of where people might travel to and how they might get there, it is likely that the traffic implications on the local highway network, particularly to the west of the site, will be found to be significantly greater than currently envisioned.

In practice, the combination of: distances to significant services; the inconspicuousness of busses; and the unattractiveness of the proposed pedestrian access strategy, can be expected to put many people off sustainable travel choices. This is contrary to current policy guidance which seeks to prioritise non-car access.

Highway Geometry

The highway authority has raised concerns over the gradient of the proposed access road and the inconsistency with the local highway authority's current design guidance.

In its response, rather than seeking to resolve the concern, the applicant has sought legal advice and challenged the local highway authority's legitimacy in setting local design standards. In doing so they cite the Manual for Streets 2, whose advice, in full, states:

A maximum longitudinal gradient of 6% (1in17) is desirable, although a gradient of 5% (1in20) is desirable where there are significant numbers of pedestrians walking along the route.

In hilly areas steeper gradients will frequently be required, but a gradient of 8% (1in12) should be regarded as a practical maximum unless there are particular local difficulties. This is also the maximum gradient that a manual wheelchair can use to negotiate (see guidance on footway gradients in Chapter 5)

Chapter 5 states:

The gradient of pedestrian routes should ideally be no more than 5% (1:20), although topography or other circumstances may make this difficult to achieve. However, as a general rule 8% (1:12) should generally be considered as a maximum, which is the limit for most wheelchair users, as advised in Inclusive Mobility

As well as reiterating the above advice on gradients, Inclusive Mobility also states:

Walking distances were researched in some detail in the late 1980s and, based on the findings from these studies, the following are recommended:

<i>Impaired group</i>	<i>Recommended distance limit without a rest</i>
<i>Wheelchair users</i>	<i>150m</i>
<i>Visually impaired</i>	<i>150m</i>
<i>Mobility impaired using stick</i>	<i>50m</i>
<i>Mobility impaired without walking aid</i>	<i>100m</i>

These figures are average measures; there is a lot of variation between individuals. Gradients, weather conditions, whether there are handrails etc, will also affect the distances people are able to walk. US regulations, for example, note that on distances over 100 feet (30m) disabled people are apt to rest frequently. These regulations suggest that to estimate travel times over longer distances allowance should be made for two minutes rest time every 30 metres.

Research based on a follow-up study to the London Area Travel Survey found that of all the people with a disability who were able to walk at all, approximately 30 per cent could manage no more than 50 metres without stopping or severe discomfort and a further 20 per cent could only manage between 50 and 200 metres.

It is believed that the highway authority's current guidance takes the view that a distance of 30metres will discriminate against the mobility impaired, which is contrary to the Equality Act 2010, as it will make a journey disproportionately longer for the mobility impaired, by requiring a rest period, when compared to that for an able bodied person.

It has been previously stated, in consultation responses, that the applicant's strategy involves 160m of a 1 in 12.5m gradient. This will require 5 rest periods, according to the US Regulations guidance cited in Inclusive Mobility.

Ultimately, the interpretation of law is a matter for the courts and the applicant appears to want to take that path. It is my view that their case is weak in this respect.

Alternative Strategy

The applicant's attitude is all the more surprising when it is considered that alternatives exist. The problems of gradient that the highway authority raises concern over are, in effect, self-imposed.

If an access to Harp Hill were to emerge at the very southwestern corner of the site, where it might connect at a point where the climb to/from the site will be minimised, gradients are likely to be much more acceptable to the mobility impaired.

Such a strategy as that described above, may also allow for a direct connection with the existing footway infrastructure, thereby offering a route with good natural surveillance for those who have no alternative but to walk or use public transport.

If the local planning authority is inclined to approve a development on the site, the applicant should be encouraged to look at alternative means of access that seek to address the accessibility issues and the legitimate concerns raised by the highway authority and in this and our previous letter.

It is noted that the highway authority has recently recommended refusal on grounds in tune with the above and on traffic impacts (this issue also considered in my letter dated 11 September 2020).

If the applicant seeks to address the highway authority's judgement and issues further reports, I would be grateful to receive notification of this so as to be able to comment further.

I look forward to hearing from you in due course.

Yours sincerely

 BEng (Hons) MCIHT
Helix Transport Consultants