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| <b>APPLICATION NO:</b> 20/00759/FUL   | <b>OFFICER:</b> Mrs Lucy White   |
| <b>DATE REGISTERED:</b> 14th May 2020 | <b>DATE OF EXPIRY :</b> 13th August 2020   |
| <b>WARD:</b> Swindon Village          | <b>PARISH:</b> SWIND   |
| <b>APPLICANT:</b>                     | Persimmon Homes Ltd  |
| <b>LOCATION:</b>                      | Elms Park Tewkesbury Road Cheltenham   |
| <b>PROPOSAL:</b>                      | Erection of new residential development (Use Class C3), new vehicular and pedestrian access off Manor Road, attenuation basin and ancillary infrastructure |

## REPRESENTATIONS

|                           |           |
|---------------------------|-----------|
| Number of contributors    | <b>31</b> |
| Number of objections      | <b>28</b> |
| Number of representations | <b>2</b>  |
| Number of supporting      | <b>1</b>  |

7 Manor Road  
Swindon Village  
Cheltenham  
Gloucestershire  
GL51 9RQ

### **Comments:** 24th June 2020

After looking at the plans, while we understand the need for additional housing we object to this planning application due to the following reasons:

1. The traffic is already horrendously congested, many weekday evenings queuing all the way to Church Road, the weekends can be awful with the traffic going towards the retail park at a complete standstill.
2. The village school is already over subscribed - where will all the children go?
3. There is an abundance of wildlife living in the fields of the proposed site; where will this all go?

5 Manor Road  
Swindon Village  
Cheltenham  
Gloucestershire  
GL51 9RQ

### **Comments:** 22nd June 2020

I object to this application on the grounds that all the new traffic generated will use Manor Road. This junction was designated as a secondary access in the Outline Plan for Elms Park. The traffic is already chaotic at peak times without this development and extra roundabout. The primary access routes have yet to be built and the development should be put on hold until they are completed

5 Manor Road  
Swindon Village  
Cheltenham  
Gloucestershire  
GL51 9RQ

**Comments:** 23rd June 2020

I object to this application on the following grounds.

1. The only access route to this development is from Manor Road. Manor Road is already a very busy route and additional traffic will cause more congestion, as well as being a potential safety risk to pedestrians on what is a narrow footpath.
2. The number of homes in the development will increase the size of the existing parish by approximately one third. No new facilities for the increased population have been included in this application.

13 Stantons Drive  
Swindon Village  
Cheltenham  
Gloucestershire  
GL51 9RL

**Comments:** 23rd June 2020

Summary:

I am writing with respect to the above planning proposal and I wish to object strongly to development in this location for the following reasons:

1. The proposed development is on land designated as Green Belt. This is in direct conflict with the Government's policy on protection of Green Belt as set out in chapter 9 of the National Planning Policy Framework (NPPF).
2. The proposed development is adjacent to an area containing Zone 3 (High risk of flooding) according to the Flood Map for Planning, provided by the Environment Agency (EA). The Flood Risk Assessment document does not provide assurance against flooding of the proposed development or existing neighbouring properties/infrastructure.
3. Insufficient provision for protection of two oak trees assessed as "high value".
4. Insufficient provision for protection of protected bat species.
5. Insufficient time given for interested parties to comment on the proposals.

Details:

Green Belt Development

6. Development on Green Belt land is acceptable in only very special circumstances. The planning proposals do not provide sufficient detail relating to the very special circumstances in relation to this development.

7. Government policy on protection for the green belt is set out in chapter 13 of the National Planning Policy Framework (NPPF) and states:

- (Para 133) "The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."

- (Para 137) "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy: (a) makes as much use as possible of suitable brownfield sites and underutilised land;

- (Para 138) "Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well served by public transport.

- (Para 143) "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances."

8. On 12 March 2020, the government's new policy paper "Planning for the future" was published. This document sets out the government's plans for housing and planning following the announcements in the 2020 Budget. The overarching theme of this paper was the development of brownfield sites. There was no mention in this paper that greenfield land development should be encouraged.

9. The Campaign to Protect Rural England (CPRE) has analysed the Government's brownfield registers, and in their report "State of Brownfield 2019" dated March 2019 it details that there is still capacity for over 59,000 homes on brownfield sites in the SW region.

High Flood Risk (References relate to the Flood Risk Assessment document)

10. Swindon Village is surrounded by areas of flood plain to the North and East. Areas of the village are already exposed to flooding during heavy rainfall, and Manor Road still floods regularly, despite recent attempts to prevent this happening. Although the planning proposal states that development will not be directly on land designated by the EA as Zones 2 or 3, the Flood Risk Assessment and Drainage Strategy does not provide a sufficient level of assurance that the development will not increase the flood risk to existing neighbouring properties or highways. It also does not provide assurance regarding the flood risk to the new development. It is also unclear from the EA Flood Map for Planning whether recently produced data has been used in the flood mapping, as it is not possible to determine the age of the data used.

(2.2.1) The flood mapping clearly shows adjacent areas of flooding, although the assessment states that there is "no risk of fluvial flooding within the site. The nearest significant flood extent is associated with the River Swilgate north of the proposed site boundary." It should be noted that it stated in APPENDIX H1 Proposed Development - Elms Park Flood Risk Assessment (Planning ref 16/02000/OUT) p.22 7.6.2: "At the centre of the site, around the location where the public footpath crosses the River Swilgate, floodwaters are not confined on the left bank and floodwaters are predicted to encroach onto the floodplains on both banks".

(2.2.3) "The mapping provided by the Environment Agency is based upon aerial LIDAR survey, and places surface water in areas where there are low points in the topography. It is accepted that the mapping is generally coarse in nature." Considering the proximity of areas liable to flooding, the statement that the mapping is "generally coarse" does not give an assurance that the flood risk can be accurately predicted. This reflects a similar comment made in APPENDIX H1 Proposed Development - Elms Park Flood Risk Assessment (Planning ref 16/02000/OUT) (iv): "The completeness or accuracy of this information is not guaranteed by BVL." "we cannot guarantee that during the lifetime of this development flood risk may not exceed that stated in this report".

11. The following statements which I believe to be relevant to this proposal were made in APPENDIX H1 Proposed Development - Elms Park Flood Risk Assessment (Planning ref 16/02000/OUT):

p.29 8.2.11 "on the majority of this site, any water that does enter the ground will be held in the upper sandy layers and topsoil, as little will be able to penetrate the clay layers below"

p.37 10.2.1 "the majority of the site is underlain by Lias Clay deposits which will contain an insignificant amount of water and will only allow limited groundwater flow through them"

p.38 10.2.3 "the one soakaway test that was attempted failed due to rapid inflow of groundwater" "it has been assumed that limited parts of the development areas nearer Tewkesbury Road only could drain to soakaways" Comment: Rapid inflow of water suggests already saturated ground with limited drainage.

12. The severe flooding of 2007 resulted in significant flooding in many areas of the Swindon Village, including Manor Road, Church Rd (including Swindon Village Primary School) and Hyde Lane. This photograph shows the impact of flooding in Swindon Village at Hyde Lane junction with Church Rd. The Flood Risk Assessment and Drainage Strategy provides no assurance that the risk to flooding from such a massive development can be accurately predicted.

[http://www.bbc.co.uk/gloucestershire/content/image\\_galleries/july\\_floods\\_gallery.shtml?30](http://www.bbc.co.uk/gloucestershire/content/image_galleries/july_floods_gallery.shtml?30)

#### Arboricultural Assessment

13. Paras (8.3-8.4) "...two high value, category A trees were recorded. The proposals will see the retention of both high value specimens. The retention of one, T93, must be prepared in line an Arboricultural Method Statement, which must detail the necessary measures to be taken during construction to ensure its protection. Without appropriate protection the long-term health of T93 would not be assured." The assessment states



that the Root Protection Area (RPA) for both trees extend under proposed development, and despite paras 5.4-5.12 detailing measures to be undertaken during development to protect the RPA, there appears to be a significant risk to the long term health of these trees.

#### Ecological appraisal

14. (p.33 Para 7.19) "No trees are currently due to be removed as part of the development proposal. If this were to change then further assessment of the trees by a suitably qualified ecologist will be required." This statement was made with reference to the presence of bats within the proposed development area. Page 46 shows the location of a tree that has potential for bats. However, the Arboricultural Assessment document at para 5.13 states "A number of trees and lengths of hedgerows are proposed for removal". The table on p.14 para 5.2 shows that approx. 50% of the trees will be removed. It is possible that the tree shown on p.46 of the Ecological Appraisal, which has potential for bats, may be T92B (shown on p.25 of the Arboricultural Assessment), and may be one of the trees to be removed. The presence of bats, and the removal of trees appears to be a concern that requires further assessment by a suitably qualified ecologist.

15. In addition to the species listed in the Ecological assessment, I would like to add that in the area of the proposed development there have been recent sightings of slow worms, buzzards and a barn owl which are all protected under the Wildlife & Countryside Act 1981

#### Insufficient time for feedback

With such a large-scale development, and volume of accompanying documentation relating to the planning proposal, the deadline for comments is unacceptable, bearing in mind the potential impact of this development on the local environment. As full-time working individuals, being designated Key Workers during the COVID-19 pandemic, it has not been possible to review all the documentation and respond in the amount of time that has been given. The comments provided here are based on only a few of over 60 documents that are listed.

43 Dark Lane  
Cheltenham  
Gloucestershire  
GL51 9RN

**Comments:** 17th June 2020  
Letter attached.

Trails End  
Stantons Drive  
Swindon Village Cheltenham  
Gloucestershire  
GL51 9RL

**Comments:** 25th March 2021

Save the Countryside provide the following statements of objection to the revised planning application which is the first phase of the Elms Park development detailed in

planning application 16\_02000\_OUT. The outcome of that planning application is still not finalised.

Many of the comments and objections that we raised in accordance with the application raised in 2020 remain as we have not seen satisfactory detail that resolves our concerns. We list those and all our comments below.

As this application refers to part of the largest incursion into previously greenbelt land. It is the position of Save the Countryside that this specific development, and all of Elms Park should set the standard for future similar developments in terms of sustainability and having the least possible detrimental impact on the environment and the existing population.

A key point is that this development is assumed to depend on infrastructure such as schools and cycle paths that are part of the wider Elms Park proposal, and these have not yet been approved. Approval of this phase must wait until overall approval. Access to the new site must be via Tewkesbury road as the original plans for Elms Park indicated, otherwise there is a danger of overwhelming traffic problems in the future, particularly when this area links to the full 4100 house estate.

Details of specific objections

1. Sustainable Development - amended comment from 23.6.2020

We are disappointed not to discover any more specific detail, comments or changes in relation to our previous comments. Except for the brief statement in 2.2.31 that the energy efficiency of the buildings will be improved in response to the government building regulations and future homes standard consultation.

Save the Countryside believe that this development should set the gold standard in terms of sustainability for the rest of the Elms Park development and many others nationwide - (such as following PassivHaus standards)

The evidence provided does not demonstrate adequate sustainability. This is contrary to what was promoted during the publicity of Elms Park, and throughout the Joint Core Strategy, and Cheltenham plan inquiry process.

There is no clear Energy Policy Statement.

There are no details provided mentioning carbon neutral power / Solar panels etc. Electric car charging points should be fully installed (beyond the proposed provision of passive infrastructure) at each property / car space within the development.

Sustainability and Climate Emergency Statement

While the Document is correct in stating that Policy SD3 does not establish energy efficiency targets or renewable energy generation targets for new residential development. In the absence of such a policy one is directed to national policy. The NPPF includes a presumption in favour of sustainable development, and specifically benchmarks this to national standards.

"New development should be planned for in ways that...can help reduce greenhouse gas emissions, such as through location, orientation and design. Any local requirements for

sustainability of buildings should reflect the Government's policy for national technical standards."

Paragraph 150, National Planning Policy Framework, 2019

In July 2019 Cheltenham Borough Council declared a climate emergency so this development as the first phase in one of the largest ever to be built on previously green belt agricultural land should set the standard for carbon neutral development.

During the Joint Core Strategy and the outline planning application for the whole Elms Park development proposals were promoted as sustainable development

This development as phase 1 of approx. 4100 homes and additional industrial and retail units must adhere to that statement.

More details are required to support sustainable development - specifically, the details included in the Sustainability and Climate Emergency Statement doc 1052523 should include specific measures to achieve carbon neutral status in this development. Point 8 does not provide any detail on green energy which must be a condition of the development approval other than the general comment that an efficient gas condensing boiler will be installed in each property.

This development should lead by example with reduced emissions per building  
All the homes should meet the PassivHaus standards (reference route to Zero Carbon standards doc and <https://www.passivhaustrust.org.uk/> )

The Persimmon Website states "We use the latest construction techniques and renewable energy sources such as solar panels and air-source heat pumps to make your home future-proof" but this application still does not specify any such measures.

A condition should be that the new homes be set up to store and even generate excess photovoltaic electricity for subsequent or external use with Heat pumps to further reduce carbon emissions.

#### Emissions Rates

Despite the general positive statements regarding the building materials to be used and that the emissions rates are in line with current government standards, this development as an important example should match or improve upon the Emissions rates achieved in the following developments

Milton Keynes MK Smart program  
North West Bicester Eco town  
Norwich - Goldsmith Street

And as proposed in the Cotswold planning application for development of 88 homes at Severell's Field in Siddington, near Cirencester

#### 2. Transport / Highways Infrastructure - amended comment

We note the comment by Highways England of no objection. However, their comment relates only to this specific site and not the wider Elms Park area.

We reiterate our concerns regarding road infrastructure below, considering the area around the site and the surrounding key roads have considerable congestion at peak times.

This application is a part of the overall Elms Park development. For that outline planning application Highways England has already advised that no approval is granted until the transport assessment work is completed.

Until the full transport study has been completed following the Cheltenham Plan, then the planning application as is cannot be approved from a transport perspective.

Save the Countryside believes that the Transport proposals for this part of Elms Park are unworkable and that the eventual congestion caused by traffic generated by the quantum of development will be unsustainable, bringing into question the sustainability of the whole proposal. Until the full transport infrastructure issues are resolved, this part of the development should not be permitted.

The Persimmon Transport Assessment document and the Persimmon Travel plan document documents state the assumption that the Highways England work is expected to be completed by 2024. So far, no evidence of work started has been found so it is unlikely that this work will all be completed by 2024. "Due to the application timescales, the Paramics modelling will not be completed prior to submission. It is intended the model results would follow-on shortly after submission as a separate addendum." This isn't acceptable - there must be sufficient modelling before the application can be considered. And it must consider the full 4100 houses as well as all the other houses that are being built in the area that rely on Tewkesbury road.

Save the Countryside have clearly stated during the consultations on the Cheltenham plan that additional traffic alleviation is required in the wider area including 2-way access on the M5 Motorway - this must be undertaken before this planning application can be approved.

As already stated in our comments on the Elms Park Outline planning application, there is insufficient evidence to demonstrate the modal shift in transport that would alleviate the additional congestion caused in the immediate and surrounding area.

The Area of Swindon Village Wymans Brook, Bishops Cleeve and Prestbury are today under pressure from Infrastructure limitations as listed below:

Existing Road Constraints in the Area surrounding the Elms Park Phase 1 (Swindon Farm) development

- Manor Road - often one lane of the road is blocked by delivery vehicles / transporters delivering to the Industrial units on Manor Road and Runnings Road resulting in delays and danger to pedestrians.
- Princess Elizabeth Way, congestion and poor air quality due to its use as access to M5 Motorway southbound
- Swindon Road - narrow railway bridge,
- Hyde Lane - low Railway bridge,
- Swindon Lane -level crossing
- Tewkesbury road already congested from M5 motorway junction towards Cheltenham

Site Access at Manor Road

In the Design and Access Statement for the Elms Park Outline planning application (16/02000/OUT)

the statement was made regarding the Elms Park second access point from Manor Road:

"This access was specifically requested by the local authority to increase local access to the central green space within the site. However, vehicular access has been removed and restricted to pedestrian and cycle access only."

This statement should be adhered to. The main access for this part of Elms Park Development during and after construction should only be from Tewkesbury Road. Now, this application reverses this statement by including a roundabout junction with Manor Road to serve the 265 houses and the adjacent proposed industrial / retail site directly via a single spine road. The site proposed in this application will be connected to the rest of the wider Elms Park development via extensions to the proposed internal site roads. Upon completion of the other phases of development, the exit onto Manor Road could be accessible to over 4100 homes and businesses.

Today Manor Road is very congested especially during peak times. The congestion has increased considerably with the increased usage of the Gallagher and other close by retail parks and the Kingsditch industrial Estate.

Already Manor Road and Runnings Road and the continuation of Manor Road up through Swindon Village are used as an alternative to Kingsditch lane to access Bishops Cleeve. If an additional volume of cars from this development are also using Manor Road, the situation will worsen.

Reducing the speed limit to 30mph along Manor road should be a condition of approval.

"Replacement of the Runnings Road / Kingsditch Lane / Wymans Lane double mini-roundabout with traffic signals" also to be welcomed since this is a very difficult place for pedestrians to cross and may impede people from walking to town.

#### M5 Motorway

Section 7.4.4 of the Transport Assessment states:

"Based upon review of the traffic distribution in Table 6-6, only a small proportion of these arrivals would be via M5 J10. It is therefore unlikely that the development would exacerbate queuing at the junction, although this will be confirmed by the outputs of the Paramics model."

This statement is misleading as already today there is unsafe queuing traffic on the southbound hard shoulder of the M5 at J10 is due to the congestion experienced along the Tewksbury Road corridor into Cheltenham, including the junction with Manor Road. Due to the lack of adequate modelling, the Transport Assessment fails to consider the impact of the all journeys to and from this site on this important issue.

This application should not be approved until the specific details and timelines of the motorway junction improvement have been agreed

#### 3. Public rights of Way - amended comment from 23.6.20

We note there has been some improvement in the revised proposal on this topic. But our comments remain.

Clear ownership of the maintenance of the footpaths in the whole Elms park area during the period of development must be clarified.

Cycle routes: While we support that the cycle route has been given priority across the adjoining roads at their junctions with the spine road, Specific enforceable plans for Cycling and clear designated footpaths through and leading from the site into neighbouring areas must be provided before approval.

Public Transport -supported

The installation of a Travel Plan Co-ordinator and measures to promote walking and Cycling is welcomed. A condition must be that this encompasses the wider area beyond Tewkesbury Road.

Electric vehicle charging ports should be part of the parking provision.

#### 4. Local green Space (LGS) - amended comment from 23.6.20

The Local Green Space that has been agreed to be included as part of the proposed Cheltenham plan has not been clearly identified within the documents. This results in an inaccurate representation of the overall area to be developed and leads to questions on the usage and maintenance of the designated local green space areas.

#### 5. Infrastructure / Services - amended comment from 23.6.20

According to outline plans in according with the Joint Core Strategy, the Elms Park development was promoted to deliver sufficient schooling and medical provision. There is no school or medical provision during this phase 1 for 265 homes just a reference that this will be part of the wider Elms Park Development (page 18 design and access statement) yet no formal indication of when this provision will be made. The closest School - Swindon Village Primary School is currently at full occupation. We expect demand on this school will be increased by the demands of families living in this development. A condition of this development should be the provision of a Nursery / Primary school.

#### 6. Flooding - amended comment from 23.6.20

We note the additional detail regarding the attenuation pond but details of the long-term maintenance plan and responsibility for the maintenance (beyond the comment regarding a management Company) must be confirmed.

A condition of the planning approval must be a total review of the surface road and area drainage in Manor road - Today land in this area particularly Manor Road by Dog Bark Lane frequently floods and has surface water for long periods (with flood water flowing south on Manor road towards the area of development) immediately after heavy rainfall as the existing drainage is unable to manage the water. This must be factored into the development.

Supplementary evidence to prove that the proposed flood alleviation from Fluvial and Pluvial flooding and water treatment plans are sufficient not only for the 265 homes as part of this development but are sufficient or easily adaptable for the wider scale Elms Park Development must be provided.

#### 7. Ecology / Wildlife - amended comment from 23.6.20

As echoed in the consultation statement from Natural England, there is a need to conduct a more detailed wildlife survey as much information regarding existing wildlife habitats is missing from the documentation.

A condition of acceptance should be for badger monitoring to be carried out immediately before building.

There should be a strong commitment to providing bat boxes and habitat for birds and other wildlife in the identified green areas of the site.

Measures to support the displaced wildlife such as hedgehog highways within the garden and green infrastructure should be included.

8. Arboriculture report amended comment from 23.6.20

We note the updated arboricultural report from February 2021.

As Sections of established hedgerow are also to be removed, a condition must be that more hedgerows and trees should be retained or new ones planted within the scheme, to compensate for those which will be removed.

29 Dark Lane  
Cheltenham  
Gloucestershire  
GL51 9RN

**Comments:** 22nd March 2021

No clear safe pedestrian crossing to allow access to/from Swindon Village (Manor Road to/from Gallagher Retail park.

The proposed 3 story development out of keeping with all other properties in surrounding area; will lead to precedence for all future development.

Are there any guarantees/covenants to ensure proposed small remaining green spaces within development cannot be built upon?

Are there any guarantees/covenants to ensure that the proposed new trees will be planted and maintained and will not be removed?

56 Quat Goose Lane  
Cheltenham  
Gloucestershire  
GL51 9RP

**Comments:** 14th January 2022

Repeating our objection to this application. The updates are minor and do not address the key issues relating to this development, namely traffic/highways, and the lack of facilities provided for the new residents. This is an attempt to get started with Elms Park, before Elms Park has been approved.

In addition, the recent government decision to pause any creation of new Smart Motorways should further call into question the impact of the Elms Park proposal, and as such any attempts by developers to begin building on the site should also be paused.

**Comments:** 16th June 2020

I strongly object to this application for two main reasons:

1. The infrastructure required to support the development does not yet exist. In much of the supporting documentation, the solutions provided to requirements of sensible and low impact development, are simply references to the larger Elms Park development. As this does not yet exist, and is currently 'Pending consideration', it is unreasonable to accept the amenities it may or may not include as reasons why this development would not be detrimental to the local area.
2. The traffic implications of only one entrance/exit to this development, and the location being on an already severely congested route.

Details of my objections:

- Location - Point 3.2 of Transport Assessment confirms that the only entrance/exit for this development is sandwiched between Runnings Road (major route through large trading estate), and Tewkesbury Road (Major A road to/from Cheltenham centre), with a roundabout serving Gallagher trading estate and Kingsditch retail park in between. Already a very congested route both at weekday mornings and afternoons, plus weekends. Adding another roundabout and several hundred vehicles onto this route will cause significant traffic issues for residents and businesses.
- Rat run - Given the choice of routes available to new residents of the development, it is clear that for anyone wishing to travel locally to the North, North-East, East (North Cheltenham, Cleeve, Winchcombe, Tewkesbury, Evesham, etc), they would use Manor Road to cut through Swindon Village using Church Road. Already an overused cut-through, this would increase traffic on a narrow residential street, including directly passing the Primary School, and local pre-school.
- Schools - Distances to nearest schools are well outside 'Acceptable' distance for walking, and the routes are not well suited for walking or cycling with children i.e. busy roads, narrow footpaths, crossing toward Swindon Village has no controlled crossing facilities or safe crossing point. This would certainly add to car journeys being made to/from the development. In addition, the nearest primary school referenced in the documentation is full and over-subscribed already.
- Local facilities - In addition to schools, the documentation asserts that there are a good number of local facilities accessible by foot or bike. However very few sit within the 'Acceptable' range, and in reality, would be undertaken by car.
- Point 4.1.2 - This states "Access to the site will be gained from Manor Road and connections through the site will subsequently provide access to further phases of development." Are we to assume that the rest of the Elms Park development is already decided? If Elms Park does not yet exist and is 'Pending consideration', how can this be taken into consideration for this application?



- Points 4.2.2, 4.2.3, 4.2.4 - In addition to the above, each of these points used the potential of Elms Park to prevent the developer having to solve any of the problems faced by this development.
- It is clear from the provision of garages, driveways and parking, that the developer is fully expecting each household to own and use multiple vehicles.
- Green space - The provision of green space is woefully poor for this many houses. A narrow strip with a pylon in the centre and overhead electrical cables is very unlikely to become a chosen recreation facility. This will further encourage more car journeys from the development.
- It is also stated that the baseline survey will not be used to set transport and traffic targets due to low sample size. It states that the second annual survey will be used to set targets. I find it wholly unacceptable that targets for traffic management would not even be set within two years of development. This shows a complete disregard for the actual impact of development.

To conclude, this entire proposal reeks of jumping the gun, rather than waiting for the approval of the wider Elms Park development. Elms Park is referenced again and again throughout this application, as the solution to all the issues this development will cause. This is clearly part of a wider development that has not yet been approved.

Adding hundreds of cars onto an already very busy set of roads is extremely worrying, and judging by the pace of the Elms Park development to date, it could be many years before any of the amenities and transport links that it will bring to this development become a reality.

I would therefore repeat my objections to this development going ahead based on the negative impact it will have on residents, businesses, and commuters.

31 Dark Lane  
Cheltenham  
Gloucestershire  
GL51 9RN

**Comments:** 16th June 2020

This will greatly change the village and impact the people who live here. It will change the character of the village and will limit the countryside space we have and use. Extra traffic on manor road will cause the village to be used as a cut through and make it less safe for our children and make it more difficult to get to our home. It is already very busy at different times along manor road and near the retail park. Adding 260 houses will make it even more busy and impact those of us already living in Swindon Village.

Tanglin  
Oakley Road  
Cheltenham  
Gloucestershire  
GL52 6NZ

**Comments:** 29th September 2020

I wish to register a strong objection to this application on the grounds of Road Safety. I notice from the Applicant's plans ['scheme proposals' drawing] that the proposed road access to this site, together with the main roads and side cul-de-sacs within the site, are almost entirely flat, wide and straight. There appear to be no steep gradients, narrow roads, tight corners or twisting sections.

CBC Planning Committee Councillors heard expert evidence from Mr Stephen Hawley, Gloucestershire County Council's Highways Development Management Team Leader, at the Planning Committee meeting considering application 20/00683/OUT on Thursday 17th September 2020. Mr Hawley advised the Planning Committee that the tortuous road access to this site via Ewens Farm Estate and Oakhurst Rise actually has some advantages because, being thereby a less conducive environment for motorists, this would actually make "a more safer (sic) environment for pedestrians and cyclists", precisely owing to the tortuous nature of these roads. Tortuous in this instance referred to the characteristics of these roads being twisting, of restricted width and with a very steep gradient. None of these characteristics appear to have been included by the Applicant for the road access to the proposed Elms Park site. One can only assume, therefore, that they are not as safe as could be achieved or as would be desired by Gloucestershire County Council Highways Development team.

Clearly, in light of the expert evidence provided by the highly experienced Mr Hawley, this makes the roads noticeably less safe than would be the case if such characteristics were to be incorporated into the road design. As it would be a relatively simple matter to lower traffic speeds and improve cycle and pedestrian safety by revising the road scheme so as to include at least some of these tortuous features, I find it hard to understand why Gloucestershire Highways have not, thus far, insisted upon such a revision.

So, until such features have been firmly and irrevocably incorporated into the site's access road and internal roads, I strongly request that you refuse permission for this application to proceed; this being in the interests of ensuring the safety of all future residents, pedestrians and cyclists within the proposed Elms Park Estate.

2 Mews Cottage  
St Peters Lane  
Dumbleton  
WR11 7TL

**Comments:** 2nd July 2020

From: Uckington Parish Council

Comments (Numbered 1 to 7 on above proposal)

Date: 25th June 2020

1. The land subject of the application is currently in agricultural use and the Parish Council consider there should be an application for change of use from agricultural use to residential use.
2. The Parish Council consider the application is premature since the land subject of the application forms part of the North West Cheltenham / Elms Park JCS Strategic Allocation which is subject to an ongoing application for outline permission

(16/020000/OUT). Until the outline application is determined it is considered there is no basis to make an application for full permission.

3. The proposed development is fundamentally car dependant. It provides for 474 on-site parking spaces ie 1.82 cars per household. This additional vehicle usage will inevitably lead to increased congestion, further reduction in air quality and associated issues. The existing road network is already at breaking point with demands from dwellings, the industrial units, the retail outlets and rat runners. This is compounded by the absence of any provision for cycle routes. If the developers wish to be forward thinking they should have in mind a development that does not have facilities for the car as is the case in some parts of some London boroughs.
4. The Manor Farm Air Quality Statement draws attention to both the existing air quality impact and the increased impacts mainly from Nitrogen Dioxide and particulates arising from any potential development.
5. The Swindon Farm Cheltenham Environmental Noise Assessment underlines a significant need for any potential development to address and mitigate noise from industry and traffic by way of acoustic barriers, glazing and ventilator
6. In relation to the application for outline permission (16/020000/OUT) Highways England have made a formal recommendation dated 21st April 2020 that planning permission not be granted for a period of six months in order to provide further time for Highways England's concerns regarding the proposed North West Cheltenham / Elms Park development's traffic impact on the Strategic Road Network. It is understood that the traffic modelling process is continuing and clearly it is difficult to see how matters can proceed until such time as Highways England are satisfied as to the issues under their control.
7. An Agricultural Land Classification (ALC) Survey does not appear to have been carried out. Such survey, carried out in 1995 by ADAS on behalf of MAFF on Swindon Farm showed 24% of the agricultural land surveyed within ALC Grade 2 (ie very good quality agricultural land). This is, therefore, by definition, best and most versatile agricultural land and should be protected and retained for sustainable food production. 76% was within Grade 3b (ie moderate quality agricultural land).

Moat House  
Uckingotn  
Cheltenham  
GL51 9SP

**Comments:** 10th June 2020  
Letter attached..

Moselle  
Hyde Lane  
Cheltenham  
Gloucestershire  
GL51 9QN

**Comments:** 18th June 2020

This would severely impact congestion around this area causing serious pollution on what is already a heavily used road. Also, the impact on the country side would be negative. This area also floods and I believe that this could cause other neighbouring houses and roads to flood too.

JS Bloor (services) Ltd  
Ashby Road  
Measham  
Swadlincote  
Derbyshire  
DER 7JP

**Comments:** 25th May 2021

Letter attached.

4 Manor Court  
Swindon Village  
Cheltenham  
Gloucestershire  
GL51 9SD

**Comments:** 13th June 2020

Having seen the plans for the development of 260 homes on what is considered to be phase 1 of the Elms Park development, I must register my objections as detailed below. As I understand this is linked to the North West Cheltenham Strategic Allocation, which as stated in the initial outline application 16/02000/OUT, refers to the need of a Primary School, also a second school to accommodate 4 to 18 year olds. If this was recognised then as a need, how can this application be approved without the need for a additional school as a minimum. There is no possibility of additional children from this development to be accommodated in Swindon Village School, also the effect of more traffic travelling through the village and the general chaos that will be caused at peak times for school drop offs and people using the village as a Rat Run on their way to work. I would therefore, suggest that before this application can be approved the necessary Infrastructure is put in place.

5 Manor Court  
Swindon Village  
Cheltenham  
Gloucestershire  
GL51 9SD

**Comments:** 19th June 2020

Letter attached.

17 Manor Court  
Swindon Village  
Cheltenham  
Gloucestershire  
GL51 9SD

**Comments:** 8th June 2020  
Letter attached.

Hedwig House  
Brockhampton Lane  
Cheltenham  
Gloucestershire  
GL51 9RZ

**Comments:** 31st January 2022  
The cycle provision surrounding this development is exceptionally poor.

A 230 metre cycle route along Manor Road is broken up by two toucan crossings and two road crossings. It is not practical at all for any cyclist to use this route. At 15mph it takes 34 seconds to cycle this route currently. It'll take an awful lot longer having to wait at two traffic light crossings and cross two roads in this distance instead.

It is obvious that this route will not be used by any cyclists, causing car drivers to become angry as they are forced to wait behind cyclists riding on the narrow road when there is an (albeit unusable) cycle path to the left or right of them.

**Comments:** 10th June 2020  
Policy A4 states that developers are expected to deliver:

"Safe, easy and convenient pedestrian and cycle links within the site and to key centres, providing segregated links where practical"

Under the heading "Accessibility by Cycle", paragraph 3.4.13 refers to an extract of the Cheltenham Cycle Map. The map that Persimmon has included specifically illustrates that the only way to cycle to or from the proposed development is on a busy road with fast traffic, requiring increased cycling experience. The development will of course exasperate this problem. The developer has specifically illustrated how inaccessible the site is by cycle, which is presumably not what is required of a Transport Plan.

I cycle along Manor Road every day and cars often perform dangerous overtaking manoeuvres in order to attempt to pass cyclists whilst there is traffic coming in the opposite direction. Cycling along Manor Road is certainly not safe, easy or convenient.

The solution for this would be for the developer to provide a segregated cycle lane along Manor Road, starting at the development and ending at the cycleway referred to in paragraph 3.4.12. I believe that the application should be refused until this can be provided.

The footpath along Manor Road is narrow and the surface is deteriorating. I know from experience that two pushchairs cannot pass each other along it. In order to encourage the use of this path by new occupants of the development, it would be prudent to upgrade and widen it, as has been done at the Kingsditch end of the path.

In a similar vein, paragraph 10 of the NPPF states that developers must:

"Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas"

There is a public footpath that runs through the site. It is clear from the plan that houses have been placed on the site with little regard for the footpath, which has been diverted to use the closest available estate road to it. I believe that the footpath should have priority - its route should remain, with the houses arranged in such a way as to promote the footpath as a pleasant route through the site, rather than effectively having it disappear forever into a generic estate road.

25 Dark Lane  
Cheltenham  
Gloucestershire  
GL51 9RN

**Comments:** 13th January 2022

In respect of the revised and additional information:

- 1) Vehicle access documents fail to include any allowance for parked vehicles which will undoubtedly take up between 2 metres and 4 metres of the designed carriageway space leaving little or no room for emergency vehicles etc.
- 2) Revised housing locations and types proposed fail to reflect the recent preferred local designs featured in the nearby St Lawrence Court. IE Bungalows and use of local Cotswold stone.
- 3) New access road design still exits onto Manor Road/Runnings Road, it fails to exit the site via the obvious existing access road to the side of Gallagher Retail Park
- 4) Thursday 7th October the Prime Minister pledged there were to be no homes on green field sites. Presumably the whole Elms Park development is therefore abandoned?

**Comments:** 17th March 2021

Revised plans for this Green Belt development do not remove the access from Manor Road and redirect it to the already constructed access road adjacent to Gallagher Retail Park.

As an estimate 2" rainfall on this proposed development would generate 8 million gallons of surface water draining rapidly from the site. The existing fields retain and release this slowly.

I doubt the capacity of the attenuation basin would be able to accommodate this

**Comments:** 17th June 2020

- 1) First and foremost this is an incursion into what is historically Green Belt.

- 2) The buildings proposed are of a standard 'clone' type and make no reference or contribution to adjacent architecture or to Regency Cheltenham. The density of housing in this proposal has the potential to create slum conditions particularly around the smaller units.
- 3) Vehicular access has been badly and inaccurately assessed. Table 6-5 Transport Assessment does not include any reference to existing local traffic flow issues. Absolutely no consideration has been given to the likely use of the area for parking by local business users. (Councillors will be aware of the ongoing issues in the vicinity of GCHQ)
- 3a) During public consultations there was a clear commitment that traffic would only access the Elms Park green belt incursion from Tewkesbury Road. That appears to have been overlooked.
- 4) Swindon Village has a tradition of no street lighting, confirmed by local referendum. (see Parish Council minutes) I see no reference to this in any document submitted.
- 5) Flood mitigation makes no reference to the undoubted enhanced flood risk to historic Medieval Tewkesbury from the River Swilgate.
- 6) Generally claims that there is adequate infrastructure are misleading particularly in respect of local schools.
- 7) Persimmon has a particularly poor site development and build quality record. This is widely reported on the internet, press and elsewhere. This application should be considered in that context.

SAVE THE COUNTRYSIDE  
 Trails End  
 Stanton Drive  
 Swindon Village Cheltenham  
 Gloucestershire  
 GL51 9RL

**Comments:** 23rd June 2020

A separate document will be sent with the full comments [available to view in Documents tab] - as copied below:

As this application refers to part of the largest incursion into previously greenbelt land, this specific development, and all of Elms Park should set the standard for future similar developments in terms of sustainability and having the least possible detrimental impact on the environment and the existing population.

1. Sustainable Development

This development should set the gold standard in terms of sustainability for the rest of the Elms Park development and many others nationwide - (such as following PassivHaus standards)

The evidence provided does not demonstrate adequate sustainability. This is contrary to what was promoted during the publicity of Elms Park, and throughout the Joint Core Strategy, and Cheltenham plan Inquiry process.

There is no clear Energy Policy Statement.

There are no details provided mentioning carbon neutral power / Solar panels / Electric car charging points.

#### Sustainability and Climate Emergency Statement

While the Document is correct in stating that Policy SD3 does not establish energy efficiency targets or renewable energy generation targets for new residential development. In the absence of such a policy one is directed to national policy. The NPPF includes a presumption in favour of sustainable development, and specifically benchmarks this to national standards.

"New development should be planned for in ways that...can help reduce greenhouse gas emissions, such as through location, orientation and design. Any local requirements for sustainability of buildings should reflect the Government's policy for national technical standards."

Paragraph 150, National Planning Policy Framework, 2019

In July 2019 Cheltenham Borough Council declared a climate emergency so this development as the first phase in one of the largest ever to be built on previously green belt agricultural land should set the standard for carbon neutral development. During the Joint Core Strategy and the outline planning application for the whole Elms Park development proposals were promoted as sustainable development

This development as phase 1 of approx. 4100 homes and additional industrial and retail units must adhere to that statement.

More details are required to support sustainable development - specifically, the details included in the Sustainability and Climate Emergency Statement doc 1052523 should include specific measures to achieve carbon neutral status in this development. Point 8 does not provide any detail on green energy which must be a condition of the development approval other than the general comment that an efficient gas condensing boiler will be installed in each property.

This development should lead by example with reduced emissions per building

All the homes should meet the PassivHaus standards (reference route to Zero Carbon standards doc and <https://www.passivhaustrust.org.uk/> )

The Persimmon Website states "We use the latest construction techniques and renewable energy sources such as solar panels and air-source heat pumps to make your home future-proof" but this application does not specify any such measures.

A condition should be that the new homes should be set up to store and even generate excess photovoltaic electricity for subsequent or external use with Heat pumps to further reduce carbon emissions.



## Emissions Rates

Despite the general positive statements regarding the building materials to be used and that the emissions rates are in line with current government standards, this development as an important example should match or improve upon the Emissions rates achieved in the following developments

Milton Keynes MK Smart program  
North West Bicester Eco town  
Norwich - Goldsmith Street

And as proposed in the Cotswold planning application for development of 88 homes at Severell's Field in Siddington, near Cirencester

## 2. Transport / Highways Infrastructure

This application is a part of the overall Elms Park development. For that outline planning application Highways England has already advised that no approval is granted until the transport assessment work is completed.

Until the full transport study has been completed following the Cheltenham Plan, then the planning application as is cannot be approved from a transport perspective.

Save the Countryside believes that the Transport proposals for this part of Elms Park are unworkable and that the eventual congestion caused by traffic generated by the quantum of development will be unsustainable, bringing into question the sustainability of the whole proposal. Until the full transport infrastructure issues are resolved, this part of the development should not be permitted,

The Persimmon Transport Assessment document and the Persimmon Travel plan document documents state the assumption that the Highways England work is expected to be completed by 2024. So far, no evidence of work started has been found so it is unlikely that this work will all be completed by 2024. "Due to the application timescales, the Paramics modelling will not be completed prior to submission. It is intended the model results would follow-on shortly after submission as a separate addendum." This isn't acceptable - there must be sufficient modelling before the application can be considered. And it must consider the full 4100 houses as well as all the other houses that are being built in the area that rely on Tewkesbury road.

Save the Countryside have clearly stated during the consultations on the Cheltenham plan that additional traffic alleviation is required in the wider area including 2-way access on the M5 Motorway - this must be undertaken before this planning application can be approved.

As already stated in our comments on the Elms Park Outline planning application, there is insufficient evidence to demonstrate the modal shift in transport that would alleviate the additional congestion caused in the immediate and surrounding area.

The Area of Swindon Village Wymans Brook, Bishops Cleeve and Prestbury are today under pressure from Infrastructure limitations as listed below:

Existing Road Constraints in the Area surrounding the Elms Park Phase 1 (Swindon Farm) development

- Manor Road - often one lane of the road is blocked by delivery vehicles / transporters delivering to the Industrial units on Manor Road and Runnings Road resulting in delays and danger to pedestrians.
- Princess Elizabeth Way, congestion and poor air quality due to its use as access to M5 Motorway southbound
- Swindon Road - narrow railway bridge,
- Hyde Lane - low Railway bridge,
- Swindon Lane -level crossing
- Tewkesbury road already congested from M5 motorway junction towards Cheltenham

#### Site Access at Manor Road

In the Design and Access Statement for the Elms Park Outline planning application (16/02000/OUT)

the statement was made regarding the Elms Park second access point from Manor Road:

"This access was specifically requested by the local authority to increase local access to the central green space within the site. However, vehicular access has been removed and restricted to pedestrian and cycle access only."

This statement should be adhered to. The main access for this part of Elms Park Development during and after construction should only be from Tewkesbury Road.

Now, this application reverses this statement by including a roundabout junction with Manor Road to serve the 260 houses and the adjacent proposed industrial / retail site directly via a single spine road. The site proposed in this application will be connected to the rest of the wider Elms Park development via extensions to the proposed internal site roads. Upon completion of the other phases of development, the exit onto Manor Road could be accessible to over 4100 homes and businesses.

Today Manor Road is very congested especially during peak times. The congestion has increased considerably with the increased usage of the Gallagher and other close by retail parks and the Kingsditch industrial Estate.

Already Manor Road and Runnings Road and the continuation of Manor Road up through Swindon Village are used as an alternative to Kingsditch lane to access Bishops Cleeve. If an additional volume of cars from this development are also using Manor Road, the situation will worsen.

Reducing the speed limit to 30mph along Manor road should be a condition of approval.

"Replacement of the Runnings Road / Kingsditch Lane / Wymans Lane double mini-roundabout with traffic signals" also to be welcomed since this is a very difficult place for pedestrians to cross and may impede people from walking to town.

#### M5 Motorway

Section 7.4.4 of the Transport Assessment states:

"Based upon review of the traffic distribution in Table 6-6, only a small proportion of these arrivals would be via M5 J10. It is therefore unlikely that the development would

exacerbate queuing at the junction, although this will be confirmed by the outputs of the Paramics model."

This statement is misleading as already today there is unsafe queuing traffic on the southbound hard shoulder of the M5 at J10 is due to the congestion experienced along the Tewksbury Road corridor into Cheltenham, including the junction with Manor Road. Due to the lack of adequate modelling, the Transport Assessment fails to consider the impact of the all journeys to and from this site on this important issue.

This application should not be approved until the specific details and timelines of the motorway junction improvement have been agreed

### 3. Public rights of Way

"Delivery of the walking and cycling infrastructure strategy will improve accessibility between the site and key destinations by walking and cycling"

Clear ownership of the maintenance of the footpaths in the whole Elms park area during the period of development must be clarified.

A condition of planning should be the clear installation of cycle paths in the surrounding area.

Specific enforceable plans for Cycling and clear designated footpaths through and leading from the site into neighbouring areas must be provided before approval. This must include a suitable cycle route into Cheltenham from the site and nearby neighbourhoods like Swindon Village.

#### Public Transport -supported

The installation of a Travel Plan Co-ordinator and measures to promote walking and Cycling is welcomed. A condition must be that this encompasses the wider area beyond Tewkesbury Road.

Electric vehicle charging ports should be part of the parking provision.

### 4. Local green Space (LGS)

The Local Green Space that has been agreed to be included as part of the proposed Cheltenham plan has not been fully included in the documents. This results in an inaccurate representation of the overall area to be developed.

### 5. Infrastructure / Services

While we understand that the wider Elms Park Development has expectations for School Shopping and Healthcare facilities, there is no clarity on when those will be provided. For this application there are no details regarding the provision of specific services such as schools or healthcare facilities by specific time periods and no commitment to give assurance that they would be in place before residential occupancy. The local Swindon Village Primary School may be heavily impacted by the demands of families living in this development. A condition of this development should be the provision of a Nursery / Primary school.

## 6. Flooding

A condition of the planning approval must be a total review of the surface road and area drainage in Manor road - Today land in this area particularly Manor Road by Dog Bark Lane frequently floods and has surface water for long periods (with flood water flowing south on Manor road towards the area of development) immediately after heavy rainfall as the existing drainage is unable to manage the water. This must be factored into the development.

Supplementary evidence to prove that the proposed flood alleviation from Fluvial and Pluvial flooding and water treatment plans are sufficient not only for the 260 homes as part of this development but are sufficient or easily adaptable for the wider scale Elms Park Development must be provided.

## 7. Ecology / Wildlife

There is a need to conduct a more detailed wildlife survey as much information regarding existing wildlife habitats is missing from the documentation

A condition of acceptance should be for badger monitoring to be carried out immediately before building.

There should be a strong commitment to providing bat boxes and habitat for birds and other wildlife in the identified green areas of the site.

## 8. Arboriculture report

There is a wide variety of mature trees and hedgerows on the site and there is a plan for a huge reduction in these trees which will have an impact on biodiversity and health and wellness for people.

Sections of hedgerow are also to be removed, and we consider this to be a negative impact on the area. The ecological appraisal report states "Hedgerows provide the habitat of greatest biodiversity value on Site". There are also dormice living in the hedgerows who need to protection.

A condition must be that more hedgerows and trees should be retained in addition to the planting of new trees and hedgerows. Specifically, trees near the boundary of the site must be protected.

9 Glynbridge Gardens  
Cheltenham  
Gloucestershire  
GL51 0BZ

## **Comments:** 12th July 2020

I strongly object. This is a beautiful green belt side with wonderful wildlife. It is also a flood plain. This site should not be built on a barrier is needed between Swindon Village and Uckington. This is too many houses for this area and will have a huge environmental impact.

Also the sign that went up with planning permission was put up during lockdown so many people will not have seen this and have had time to give their opinions

**Comments:** 12th July 2020

This is a beautiful green belt side with wonderful wildlife. It is also a flood plain. This site should not be built on a barrier is needed between Swindon Village and Uckington. This is too many houses for this area and will have a huge environmental impact.

14 Chapel Lane  
Woodmancote  
Cheltenham  
GL52 9HT

**Comments:** 6th June 2020

Despite the statement on page 24 of the Design and Access Statement that the proposed development will "Enliven and provide connections to the existing network of Public Rights of Way" there is no evidence that this objective has been reflected in the design.

The proposed diversion of the Public Right of Way CHS16 completely ignores the recommendations of Rights of Way Planning Circular 1/09, in particular section 7.8 which states

"7.8 In considering potential revisions to an existing right of way that are necessary to accommodate the planned development, but which are acceptable to the public, any alternative alignment should avoid the use of estate roads for the purpose wherever possible and preference should be given to the use of made up estate paths through landscaped or open space areas away from vehicular traffic."

On this basis the proposed diversion is unacceptable and should, as recommended, follow a green corridor through the development which encourages the use of the route and supports the objectives of the Gloucester County Council Rights of Way and Countryside Access Improvement Plan and the Central Severn Vale Cycling and Walking Infrastructure Plan which seek to encourage the development of the footpath network, not the degradation of routes by urbanisation.

51 Mandarin Way  
Cheltenham  
Gloucestershire  
GL50 4RR

**Comments:** 13th June 2020

Access - should not be from Manor Road. This is already far too busy for a small village and will be very dangerous, especially given the location. There do not appear to be any plans for infrastructure improvements.

No evidence of sustainability.

This is Green Belt land and is vital for the health and wellbeing of the local community both physical and mental.

Footpaths and bridal paths are in constant use by walkers, horse and bicycle riders use these routes daily.

Desecration of wildlife habitats

11 Hulbert Close  
Cheltenham  
Gloucestershire  
GL51 9RJ

**Comments:** 17th June 2020

I have several points of objections I'd like to make:

- 1) 260 new homes means an addition of at least over a thousand people added to the village. The current roads and infrastructure cannot already cope with the retail and industrial park. Not to mention the new businesses that will join the kingsditch Estate shortly. This population increase will also impact on the public sector. What support will they have to manage this influx? I think additional roads off perhaps Tewksbury road would be more beneficial.

With this in mind, wouldn't a new housing estate be more appropriate off HAYDEN road before you turn into Next and Sainsbury's. Construction traffic will have easy access and there will be less disruption to Residential neighbours. I have also known that area of land be dormant for over twenty years.

- 2) You are destroying Cheltenham's green belt. That area of proposed planning is regularly used by the public and farm land. It is a pretty and beautiful space and should be protected for environmental purpose, future generations and reduction on our carbon footprint.
- 3) the crime rate of the Residential part of Swindon village is low. I appreciate with social housing, as a governing body you can design the houses but not the people you put in them. Out of this new 1000 people 10% will be social housing if not more. Learn from the lessons of Bishops Cleeve. Once a beautiful village now plagued by crime and ASB. Don't let Our historical village be the next Bishops Cleeve and the next undesirable place to live!

6 Manor Court  
Swindon Village  
Cheltenham  
Gloucestershire  
GL51 9SD

**Comments:** 23rd March 2021

Following the updated information from the developer I would like to add the information below to my concerns in relation to the development.

Please could you read this in conjunction with my previous comments as I believe they are still valid .

In relation 2 flooding

I still have concerns in relation to flooding within the area, as when there is heavy rain part of Manor Rd by the stream area has significant floods, where cars cannot see parts of the road, and at times cars have to move into the middle of the road or divert through

the village. I believe that with excess surface water due to the development, as it will not be absorbed through the ground there is still a risk to increase flooding of Manor Rd which may in turn make it more and more impossible with heavy rain falls .

I note from the information that an alternative for surface water drainage has been mentioned, for it to be diverted into the stream, which seems a possibility however I would strongly advise this is considered, obviously this then may lead to flooding of the stream and therefore flooding of the bridle path at the lower end of the proposed development, I believe further consideration needs to be given and discussed.

Overall, I feel a concern in relation to the probability of increased flooding to Manor Rd. In relation 2 the proposed pedestrian entrance at the bottom of the proposed development

It states on the plans, "dog bark Lane" in fact this is not a Lane it is a muddy bridle path. and I note the drawings shows a slight junction into this bridle path from the road, there is no junction it is just the entrance to the bridle path.

My concerns in relation to this the safety of pedestrians, as on this side of the road there is no pavement therefore pedestrians will need to cross the road to the pavement . However the exit of the bridle path is very close to a steep bend in the road where visibility of cars coming from the Runnings Rd area is poor, also vehicles tend to come round this corner very quickly over 30 miles an hour and would not see a pedestrian crossing the road until it is likely to be too late! Therefore I feel the risk of injury to pedestrians and accidents in this area needs to be considered and if this is going to be used as a pedestrian entrance /exit for the to the proposed development, then I feel consideration needs to be given for a footpath on the same side of the road as the bridle path to allow pedestrians to cross at a safer point along Manor Rd.

In relation to the proposed access to the proposed development along Manor Rd My concerns about this access remained the same, I note from the plans that there are two main accesses from Tewkesbury Road and by the side of Gallagher retail park and that there is a secondary access along Manor Rd, where a proposal for a roundabout for traffic management has been suggested. I also note from the recent new information, the developer has advised that there is already access at this point , however for your information this access road actually is a lane that only led to the farm and therefore only farm vehicles used this track so I would presume possibly up to six vehicles whereas with the development we are looking at 250 vehicles plus and also as the site develops there may be a possibility of 500 to 1000 plus vehicles using this exit or access.

I believe even 250 vehicles extra at peak times of the day would add to the already large traffic numbers/delays and queues seen at peak times which are mornings/ lunch times, and evenings ( outside COVID-19 restriction). There are normally queues from the Manor road /Runnings Rd junction back to the roundabout by Sainsbury's petrol station and beyond and from Runnings Rd which can go back to Swindon Lane. This traffic has increased over the last few years, which I believe is due to the increased development at Bishops Cleeve as traffic uses Hyde Lane to get to different parts of Cheltenham. I am not sure whether traffic volumes have actually been considered and therefore feel that you need to consider this further, as further increased traffic from development is likely to add more pressure to an already busy local small Road.

I also believe that the current proposed area for the roundabout will add more problems as the junction at Runnings Rd /Manor Rd is a few 100 yards in one Direction and the roundabout a few 100 yards the other direction. If there is a requirement for a secondary access then I believe thought should be considered for this to be at the junction of Manor Road and Runnings Rd as this would help manage the traffic in these areas without extra next junction in the current proposed secondary access area, looking at the plans this is likely to be feasible due to land close to this area not being developed on.

However, I believe that there should not be an access into Manor Rd as I feel it will cause increased traffic delays to the local area and businesses and feel that this development should be made to develop the access at side of Gallagher retail park as this is already set up for an access point and I believe the only reason for using Manor Rd, as a secondary access is to commence the Elms park development and that the cost to the developer will be cheaper for the Manor road access than the Gallagher retail park one, I believe that by using the access by Gallagher retail park this will help to reduce congestion in the Manor Rd running's Rd area.

**Comments:** 28th June 2020

Having reviewed the planning application I have a few comments in relation to the proposed entrance exit to the new build area and the application its self

Firstly

- the application states there are several bus routes along manor road there is only one bus route "H" the others are else where, in my mind as this is not correct, does it bring into question other statements made within the planning application and I feel the application should be thoroughly read by the appropriate areas.

- it also mentions- we do not consider it to compromise the environmental impact. I would beg to differ as the area is very close to a flood plan and with increased housing and reduced fields for drainage the is a possibility the flood plan area grade 3 by the water board may be impacted and increase the probability of increased flooding along the section of manor road leading off Running road. I also feel it will impact traffic going through the village itself as well as the safety of predestinations in the village there is a sharp bend and cars have mounted the kerb due to the narrow road question with no new schools is there room in the local schools.

In relation to the entrance to the new build area you are likely to have at least an increase of 200 -500 cars especially at peak times. at present at peak times up to 3 times a day you can have queues from the manor rd/running road junction to Galliger retail park area and reverse way this usually goes up to Manor Court and beyond and up to the Swindon road and Tewksbury road.

I think the road /traffic surveys were done at non peak times and when schools were off as I remember seeing this take place, therefore the surveys are not a full true audit of the traffic.

Even with a roundabout and traffic management the traffic queues will be worse due to the short space from the junction from Swindon Village and the roundabout.

Why have the construction company not put in plans to have the access by/Next/Sainsburys as this area is much quieter and less used with traffic lights already in place this would then prevent horrendous traffic issues and increase frustration for



traffic in the Swindon Village area which has increased dramatically since the increased housing in Bishops Cleeve.

personal some time it can take me 30minutes plus to get from Manor court to the Manor Rd junction what will this increase to and what environmental effect does idling cars have on the general environment

In my opinion and looking at the facts I believe the council need to seriously consider the access and where it should go in relation to the least possible effect to both local and other traffic that use this area .

Overall I believe the access onto Manor road will cause issues with safety and increased traffic in Swindon Village as well as longer queues and more standstill traffic leading to increased environmental issues.

if the access was by Sainsburys/Next I think the traffic queues would be less as this area sees very little traffic even by people entering Galliger Retail park and therefore less queues means less environmental issues.

the above is the reason for my objection to the current plans,

I believe more research is required by the council and road agencies. as well as the concern on increased flooding to Manor road where it does continue to flood in heavy rain storms and these are increasing

24 Church Road  
Swindon Village  
Cheltenham  
Gloucestershire  
GL51 9QP

**Comments:** 22nd June 2020

We object to the proposal on the following grounds.

- 1) Traffic. The traffic along Manor Road is already heavily congested. The road is continually at a standstill with queued traffic and would not cope with the additional vehicles. It would also be likely that drivers would use the Village as a cut through to avoid the queues. It is clearly stated in the Elms Park outline that all traffic to and from the development would be via Tewkesbury Road.
- 2) Flood. The area floods regularly and any development would cause more flooding.
- 3) Green Belt. This area should continue to be designated Green Belt.
- 4) Pollution/Countryside. The additional housing would cause increased pollution and would destroy wildlife habitats.
- 5) Infrastructure. The local Primary school is already full and would not be able to accommodate additional children from the development.

The Bell,  
Brimscombe Hill  
Burleigh  
Stroud  
Gloucestershire  
GL5 2PU

**Comments:** 19th July 2020

Having looked through the details of this application I can find no mention at all of any proposed application to divert Unclassified Road 50387, but it would appear to be an essential prerequisite if the detailed part of this proposal were permitted to proceed. It would also appear to be a prerequisite for the outline part (outlined in blue) of the development to the south and west of detailed part (outlined in red). The 50387 is an untarred 'green lane' and so an important part of the local public rights of way network - footpath CHS16 links to it. Such 'green lanes' are a decreasing and often overlooked part of our countryside so every effort should be made to preserve them, and not have them replaced by bland, uninteresting tarred residential estate roads.

The Cider House  
Colmans Farm  
Cheltenham  
GL51 9TG

**Comments:** 27th January 2022

I am so saddened to hear that our lovely village is set to become a suburban sprawl. It will be marketed as 'country village living' whilst it's mere creation ruins the real countryside that was there. Is nothing sacred? In the words of Joni Mitchell "you don't know what you've got 'til it's gone". When will it end?

Colmans Farm  
Elmstone Hardwicke  
Cheltenham  
GL51 9TG

**Comments:** 23rd January 2022

As a resident who will be impacted by this development, I would like to object to this as outlined, on the grounds articulated well by Save the Countryside and Swindon Village Parish Council.

I would particularly note the lack of information provided on the full ecological diversity of the area (including farming), transport impacts and lack of alignment to local environmental characteristics. I would encourage those reviewing this application to visit the length of Dog Bark Lane and the proposed plot for this development ahead of making any judgements. In so doing I believe it would highlight the impact that the proposal could make to the area, its residents and ecology.

I would also encourage those reviewing this proposal to travel the roads impacted by extra traffic (both construction and from the extra volume of residents) to review how appropriate the transportation mitigations are. I'd equally encourage doing so on bicycle or consulting cyclists directly on the accommodations being put forward.

Finally I would consult with local GPs (including the Local Medical Council and CCG) and local school heads to understand the impact of extra residents will have upon health and education facilities that are currently overloaded. It would be helpful to gain their recommendations on the require provision for such a large extension to a small village.

JS Bloor Services Ltd  
Ashby Road  
Measham  
Swadlincote  
Derbyshire  
DE12 7JP

**Comments:** 8th March 2022  
Letter attached.

55 Farmington Road  
Cheltenham  
Gloucestershire  
GL51 6AG

**Comments:** 12th January 2022

I would like to object to the proposed application on grounds that the proposed cycle infrastructure connections to the existing cycle network are incomplete and undesirable, and therefore the assumptions around traffic abatement are overstated. Given Cheltenham Borough Council's policies on climate change and active travel, approval of this application would therefore be inconsistent with the stated travel plan ambitions.

I refer to document 'Persimmon Homes South Midlands: Swindon Farm - response to GCC Consultation December 2021' prepared by PJA Birmingham which shows the proposed highways connections.

Although apparently prepared in collaboration with GCC, Appendix D contains errors and design flaws which will make the proposed network unusable for cyclists.

The 1:750 diagram, middle p30, shows no proposed changes to the signal controlled crossing of Manor Road where it connects with Tewkesbury Road. This fails to appreciate that this is currently a puffin, not a toucan, crossing and therefore is not accessible to cycle users. The section of pavement along the north side of the Tewkesbury Road between Manor Road and Hayden Road (in front of Sainsburys) is also pedestrian use only. As such, the proposed shared path makes no connection to existing cycle facilities and will require cycle users to dismount to get anywhere beyond Manor Road.

The decision to position this path on the west side of Manor Road is also risky, creating the need for a crossing of the entrance to the superstore and retail park. Based on published volumes of traffic using this entrance, the proposed uncontrolled crossing at the exit of a roundabout is likely to only represent appropriate provision for 'a few people and will exclude most potential users and/or have safety concerns', based on current LTN 1/20 standards.

Further up, the proposed route requires two crossings for a section on the east side of Manor Road, introducing delay and inconvenience, as well as tight turning circles at each point. This means that the frequency of stops required by cyclists is >4 per km, scoring a 0 on the Cycling Level of Service assessment tool.

Combined, this means that the route will be perceived as undesirable, meaning many will either choose not to cycle, or remain on the road, where their safety is compromised by drivers who perceive cyclists should be 'on the cycle path'. A better arrangement would be to position a dedicated route on the east side of Manor Road, allowing it to cross Rutherford Way (a much quieter arm of the roundabout), and avoiding the need for swapping back and forth further up. Instead, a dedicated crossing directly into the new development access road, and to the superstore could be provided.

This would also avoid the need to upgrade the signals at Tewkesbury road, although there is opportunity for the associated works to require upgrade to an appropriate single phase cycle crossing of Manor Road at the Tewkesbury Road junction, as well as upgrade of the footpath up to Hayden Road to a cycle path, providing future continuity to the proposed M5 J10 works, which stop at Hayden Road, through to the existing Cheltenham network.

Towards Cheltenham, the application fails to address the very wide corner of the access to the Lidl Car park. Again, additional measures here such as a raised table, and a narrowed junction corner radius, would increase safety and amenity of the route.

Finally, the application also fails to address the potential amenity of Dog Bark Lane as a cycle connection. It provides an ideal traffic free route towards Tewkesbury via Hardwicke, but is currently a muddy track that is heavily rutted and often unusable. Including provision for upgrade of this route to a multi-user bridleway with a solid surface and accompanying horse track, would create massive additional connectivity for the development.

The development itself contains many positive cycle features, but for these to be meaningful, it is imperative that they effectively connect to a usable wider network.

The Manager  
Building Development  
Municipal Buildings  
Cheltenham.

43 Dark Lane  
Swindon Village  
GL51 9RN.  
14.6.20

Dear Sir/Madam.

Building Development 20/00759/Ful

With reference to the above at Swindon Village

1/ I am against this development because:-  
the building land is valuable for food  
production + grazing for sheep + cattle.

2/ The meadows towards Swindon Village are  
flood plains + trees + hedges contain flood  
waters + have been since medieval times.

3/ The land is green belt + valuable for wild  
life - birds, animals + insects to pollinate  
our crops.

4/ Pollution from increased vehicles exhausts  
will endanger the population of the area  
+ all roads will be grid locked stretching  
to M5 motorway + beyond. Fine engines  
on Tewkesbury Rd could be held up endangering  
lives.

5/ In the current situation these homes  
will not be affordable to needy people pro.

but only benefit those who can afford mortgages  
+ whole scheme could be a 'white elephant' !!

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6/ What should be proposed is the demolition of empty shops, malls + offices throughout country + build needed homes in towns in small groups interspersed with shops + offices + green patches within towns for trees + shrubs - thus rejuvenating towns. Existing shops + offices should provide accommodation above - enabling Councils to collect rents + taxes to provide necessary services for population.

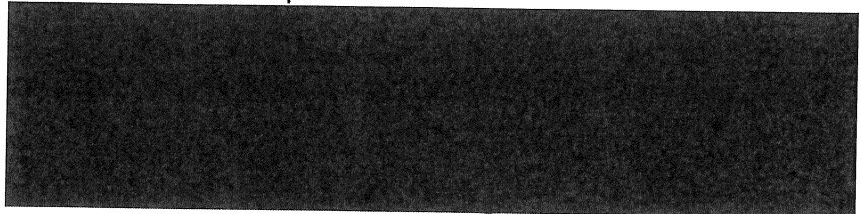
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7/ Underground pipes, drains + cables already exist in towns, + only need keeping up to date.

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8/ Most people enjoy living near shops + it would be a good way to lessen air pollution as they could walk to shop + work instead of using transport. - With Government plans for Zero Pollution by 2050 - We would all be ahead of the game!

Yours sincerely



MOAT HOUSE  
UCKINGTON  
CHELTENHAM GL51 9SP  
[REDACTED]

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Cheltenham Planning Department.

Tewkesbury Planning Department.

Highways Gloucestershire.

cc. Mr. L. Robertson MP. Mr. A. Chalk MP.

7<sup>th</sup> June 2020

Dear Sir or Madam,

**Reference : Proposed building between Uckington and Bishops Cleeve and related M5 junction 10 road changes.**

We refer to the above and would appreciate some answers to the following questions:

1. After the severe flooding our Country experienced yet again earlier this year, why are we still considering this scheme to be a good idea? For a variety of reasons, the World is rapidly becoming a very different place in which to live. Flooding is one of those reasons and should now be considered as 'normal' in low lying areas close to rivers. Numerous well respected studies prove this and, the above area, very much meets that criteria. Common sense should tell us that more concrete, more tarmac and more houses in low lying areas combine to create real problems for those who already call these areas home. We lived through the 2007 floods here in Uckington and know how devastating disasters like this can be. Build more houses if necessary but choose the site with care and consideration for others.
2. All of us are painfully aware that the final outcome of the corona virus is going to be financial disaster for our Country. Why then are we proposing to spend well in excess of £200million on a changed road scheme at junction 10 of the M5 that will just help to exaggerate the problems mentioned at point 1 above?
3. If this overall scheme is still only at the 'proposed' stage, why did Highways allocate 2-3 men to clear the pathway that runs along the side of the Tewkesbury Road at Uckington from the M5? They were there for at least a week using up valuable resources that could have been better used on filling the dangerous potholes that litter our roads throughout

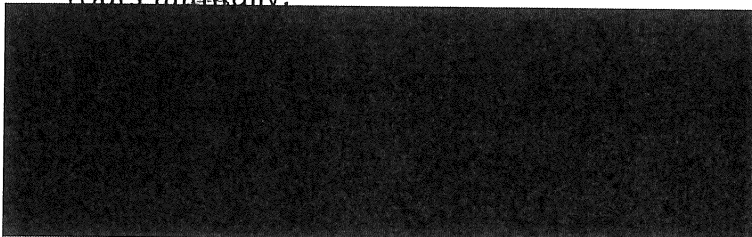
Cheltenham and the surrounding area. The famous Cheltenham Promenade currently looks and feels like a ploughed field!

4. If this overall scheme is still only 'proposed' why have eight perfectly good homes been left empty for years along the Tewkesbury Road at a time when we are told that more housing is urgently needed in this area?
5. If this overall scheme is still only 'proposed' why has the Council purchased a bungalow at the junction of Moat Lane with Tewkesbury Road and just left it empty for almost a year? Again, if housing is in such short supply, why does tax payers money get spent in such a cavalier manner?
6. We have had two separate companies contact us in recent weeks to ask for our permission to check our moat and grounds for, and I quote, ground nesting birds, certain newts, water voles and beavers. One of the companies was telephoning from Greece to make that appointment! At their own admission, these companies were 'coming just to tick boxes for the Council'. The first company arrived and spent 10 minutes in the field adjacent to our house. Again, why is tax payers money wasted on such futile and, so called, ecological studies? Ten minutes wandering around a field will tell you absolutely nothing of substance. All it does is tick the appropriate box for the planners to show that checks have been made.

We wish to emphasise that we are far from being NIMBY's!! The main building scheme (Elms Park?) is far enough away to make little or no difference to where we live. The points we raise above merely question the common sense and affordability of such a scheme at a time when the World and our Countries finances are in a **totally** different place to the time when Elms Park was first conceived. To simply plough on ahead with everything at a time when common sense tells you that its wrong is simply irresponsible. BE BRAVE, PRIORITISE MONEY TO WHERE IT'S NEEDED, KEEP YOUR COUNCIL TAX PAYERS SAFE FROM FLOOD AND THINK AGAIN.

We look forward to hearing from you.

Yours faithfully,







19th April 2021

Ms Tracey Crews  
Director of Planning  
Cheltenham Borough Council  
Municipal Offices  
Cheltenham  
Gloucester  
GL50 9SA

Dear Ms Crews

**Application No: 20/00759/FUL, 265 New Homes, Manor Road**

Bloor Homes is a major landowner and developer within the Joint Core Strategy comprehensive housing allocation at North West Cheltenham (Policy A4). This planning application represents an initial phase of the wider allocation and I am therefore submitting this representation in the interests of protecting the deliverability of the North West Cheltenham scheme.

Bloor has no objection to this 265 dwelling application subject to arrangements being put in place to ensure that the application will not prejudice the delivery of the comprehensive allocation. Bloor's concerns are simply addressed through the completion of a Collaboration Agreement between the main landowners and developers (Bloor/Persimmon/GCC). This Collaboration Agreement needs to deal with the promotion, implementation and delivery of the wider allocation but will also need to agree any infrastructure and Section 106 costs which are fairly and reasonably attributable to this 265 dwelling application. This Collaboration Agreement needs to be entered into before the Planning application is reported to committee for determination.

Without a Collaboration Agreement in place Bloor cannot have any confidence that this 265 home scheme will not prejudice the wider allocation in terms of issues such as apportionment of S106 and infrastructure costs, highway capacity and the inconsistency with the wider North West Cheltenham Masterplan. These are however all matters that can most easily be addressed through a Collaboration Agreement.

Furthermore, the Collaboration Agreement will confirm Persimmon's commitment to positively promote and deliver the balance of the scheme jointly with Bloor and GCC to ensure that Persimmon, once having secured permission on the 265 home scheme, focuses on this limited phase only, directly prejudicing any further development from taking place.

The terms of a Collaboration Agreement are already well rehearsed and GCC has already obtained approval from the Council's Internal Property Board to enter into such an agreement. A short period of effort should therefore place us in a position where a Collaboration Agreement could be entered into in advance of this application being reported to committee.

I would reiterate that Bloor does not object to this application in principle as a first phase of the wider project, but we must also ensure that the deliverability of the wider North West Cheltenham allocation is not undermined. In the event that we are able to complete a Collaboration Agreement with Persimmon Homes that deals with the aspects outlined above, then I would be happy to fully offer my support for this application.

50 YEARS  
& COUNTING

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Registered No. 02164993 England.  
Registered Office Ashby Road, Measham, Swadlincote, Derbyshire DE12 7JP VAT Reg No. 125 4938 61

[bloorhomes.com](http://bloorhomes.com)

I trust that you will find this representation helpful, but please do not hesitate to contact me if you have any queries or questions.

Your

Spencer Claye

Senior Planning and Development Director

Cc Sandra Ford – Development Services Manager – Tewkesbury Borough Council



5, Manor Court,  
Swindon Village,  
Cheltenham

Glos.

GL51 9SD

10<sup>th</sup> 6. 2020

Dear Mr. Oakhill.

Ref. 20/00759/ Ful

I am writing to object  
to the planning application. My  
first concern is that the road  
infrastructure is not sufficiently  
planned, planned to take the  
amount of traffic. At the  
moment the road is congested  
already with shoppers workers and  
general traffic. Traffic also  
from Bishop's Cleeve use the  
PTO.

2

roads through the village as a short cut to avoid congestion on the other roads.

I also object to the look of the new proposed building they are ugly and show no character.

A new school would need to be built before the houses as our village school is already over subscribed.

I object to the fact that this planning has been presented when we are in the middle of a pandemic. I rang Mr Hemphill to book an appointment to view the plans at the Municipal offices. they are closed as is the libraries. Not everyone has

3/

access to the internet and people who are shielding are very unlikely to go out and see the notice of planning stuck to a lamppost. Not all of the village has been informed by a letter.

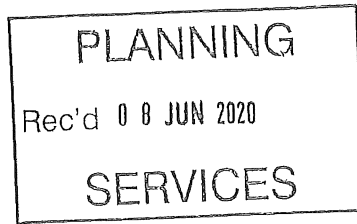
I have tried to ring the number on the letter 01242 774940 to register to speak to the committee and the number is not recognised. I have rang Mr Hemphill to inquire why the number is not recognised and I am still waiting for a reply.

Please do not congest our roads and village. The amount of toxic fumes will be a health concern to all.

Yours Sincerely







17 Manor Court  
Swindon Village  
Cheltenham  
GL51 9SD  
4 June 2020

Dear David Oakhill

**Proposal: Demolition of a dwelling and the erection of 260 dwellings (Use Class C3), new vehicular and pedestrian access off Manor Road, attenuation basin and ancillary infrastructure at Elms Park Tewkesbury Road Cheltenham**

I refer to the proposed application to erect 260 new buildings on the current Swindon Farm plot as given in the above title.

I totally disagree with this application and object to it on traffic and privacy grounds.

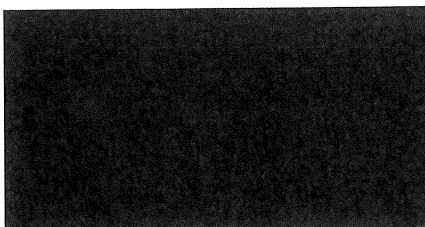
There is already a problem with traffic in this area particularly during peak work hour times and to add another 260 dwellings and the extra traffic this will involve will only make the matter worse. In addition, Swindon Village will become a prime target to be used as a "rat run" increasing the volume of cars driving through it (and most likely at speeds in excess that the current road traffic laws allow?) thus creating a more dangerous environment for the residents.

To increase the current one dwelling to 260 seems to me to be very extreme. It is well known that most households these days have at least one (and in most cases 2) cars to their names and to add this number to the current traffic volumes will create a vast bottleneck at most times of the day. The queues to the shops will be enormous and with extra cars going through Swindon Village, the air pollution will also take a turn for the worse.

Swindon Village is currently a quiet and peaceful village and was one of the main reasons I chose to move here; which I am sure is the same for many of the other residents too. To create more houses in the close proximity will take away the village atmosphere, will change the environment completely and will greatly affect the privacy that we now enjoy.

Having studied the plans for this development it seems that the builders are trying to pack as many houses as possible into a relatively small piece of land. I accept that "profit" is the main incentive behind this but surely, less and more attractive housing can be built instead, which will coincide with the current ambiance that the area enjoys?

Yours sincerely







13 Stantons Drive  
Swindon Village  
23 June 2020

**Reference:**

Planning Application No: 20/00759/FUL  
Elms Park Tewkesbury Road Cheltenham Gloucestershire

**Summary:**

I am writing with respect to the above planning proposal and I wish to object strongly to development in this location for the following reasons:

1. The proposed development is on land designated as Green Belt. This is in direct conflict with the Government's policy on protection of Green Belt as set out in chapter 9 of the National Planning Policy Framework (NPPF).
2. The proposed development is adjacent to an area containing Zone 3 (High risk of flooding) according to the Flood Map for Planning, provided by the Environment Agency (EA). The Flood Risk Assessment document does not provide assurance against flooding of the proposed development or existing neighbouring properties/infrastructure.
3. Insufficient provision for protection of two oak trees assessed as "high value".
4. Insufficient provision for protection of protected bat species.
5. Insufficient time given for interested parties to comment on the proposals.

**Details:**

**Green Belt Development**

6. Development on Green Belt land is acceptable in only very special circumstances. The planning proposals do not provide sufficient detail relating to the very special circumstances in relation to this development.
7. Government policy on protection for the green belt is set out in chapter 13 of the National Planning Policy Framework (NPPF) and states:
  - (Para 133) "The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."
  - (Para 137) "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy: (a) makes as much use as possible of suitable brownfield sites and underutilised land;
  - (Para 138) "Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well served by public transport.
  - (Para 143) "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances."
8. On 12 March 2020, the government's new policy paper "Planning for the future" was published. This document sets out the government's plans for housing and planning following the announcements in the 2020 Budget. The overarching theme of this paper was the

development of brownfield sites. There was no mention in this paper that greenfield land development should be encouraged.

9. The Campaign to Protect Rural England (CPRE) has analysed the Government's brownfield registers, and in their report "State of Brownfield 2019" dated March 2019 it details that there is still capacity for over 59,000 homes on brownfield sites in the SW region.

#### **High Flood Risk (References relate to the Flood Risk Assessment document)**

10. Swindon Village is surrounded by areas of flood plain to the North and East. Areas of the village are already exposed to flooding during heavy rainfall, and Manor Road still floods regularly, despite recent attempts to prevent this happening. Although the planning proposal states that development will not be directly on land designated by the EA as Zones 2 or 3, the Flood Risk Assessment and Drainage Strategy does not provide a sufficient level of assurance that the development will not increase the flood risk to existing neighbouring properties or highways. It also does not provide assurance regarding the flood risk to the new development. It is also unclear from the EA Flood Map for Planning whether recently produced data has been used in the flood mapping, as it is not possible to determine the age of the data used.

(2.2.1) The flood mapping clearly shows adjacent areas of flooding, although the assessment states that there is "no risk of fluvial flooding within the site. The nearest significant flood extent is associated with the River Swilgate north of the proposed site boundary." It should be noted that it stated in APPENDIX H1 Proposed Development – Elms Park Flood Risk Assessment (Planning ref 16/02000/OUT) p.22 7.6.2: "At the centre of the site, around the location where the public footpath crosses the River Swilgate, floodwaters are not confined on the left bank and floodwaters are predicted to encroach onto the floodplains on both banks".

(2.2.3) "The mapping provided by the Environment Agency is based upon aerial LIDAR survey, and places surface water in areas where there are low points in the topography. It is accepted that the mapping is generally coarse in nature." Considering the proximity of areas liable to flooding, the statement that the mapping is "generally coarse" does not give an assurance that the flood risk can be accurately predicted. This reflects a similar comment made in APPENDIX H1 Proposed Development – Elms Park Flood Risk Assessment (Planning ref 16/02000/OUT) (iv): "The completeness or accuracy of this information is not guaranteed by BVL." "we cannot guarantee that during the lifetime of this development flood risk may not exceed that stated in this report".

11. The following statements which I believe to be relevant to this proposal were made in APPENDIX H1 Proposed Development – Elms Park Flood Risk Assessment (Planning ref 16/02000/OUT):

p.29 8.2.11 "on the majority of this site, any water that does enter the ground will be held in the upper sandy layers and topsoil, as little will be able to penetrate the clay layers below"

p.37 10.2.1 "the majority of the site is underlain by Lias Clay deposits which will contain an insignificant amount of water and will only allow limited groundwater flow through them"

p.38 10.2.3 "the one soakaway test that was attempted failed due to rapid inflow of groundwater" "it has been assumed that limited parts of the development areas nearer Tewkesbury Road only could drain to soakaways" Comment: Rapid inflow of water suggests already saturated ground with limited drainage.

12. The severe flooding of 2007 resulted in significant flooding in many areas of the Swindon Village, including Manor Road, Church Rd (including Swindon Village Primary School) and

Hyde Lane. This photograph shows the impact of flooding in Swindon Village at Hyde Lane junction with Church Rd. The Flood Risk Assessment and Drainage Strategy provides no assurance that the risk to flooding from such a massive development can be accurately predicted.

[http://www.bbc.co.uk/gloucestershire/content/image\\_galleries/july\\_floods\\_gallery.shtml?30](http://www.bbc.co.uk/gloucestershire/content/image_galleries/july_floods_gallery.shtml?30)

### **Arboricultural Assessment**

13. Paras (8.3-8.4) "...two high value, category A trees were recorded. The proposals will see the retention of both high value specimens. The retention of one, T93, must be prepared in line an Arboricultural Method Statement, which must detail the necessary measures to be taken during construction to ensure its protection. Without appropriate protection the long-term health of T93 would not be assured." The assessment states that the Root Protection Area (RPA) for both trees extend under proposed development, and despite paras 5.4-5.12 detailing measures to be undertaken during development to protect the RPA, there appears to be a significant risk to the long term health of these trees.

### **Ecological appraisal**

14. (p.33 Para 7.19) "No trees are currently due to be removed as part of the development proposal. If this were to change then further assessment of the trees by a suitably qualified ecologist will be required." This statement was made with reference to the presence of bats within the proposed development area. Page 46 shows the location of a tree that has potential for bats. However, the Arboricultural Assessment document at para 5.13 states "A number of trees and lengths of hedgerows are proposed for removal". The table on p.14 para 5.2 shows that approx. 50% of the trees will be removed. It is possible that the tree shown on p.46 of the Ecological Appraisal, which has potential for bats, may be T92B (shown on p.25 of the Arboricultural Assessment), and may be one of the trees to be removed. The presence of bats, and the removal of trees appears to be a concern that requires further assessment by a suitably qualified ecologist.
15. In addition to the species listed in the Ecological assessment, I would like to add that in the area of the proposed development there have been recent sightings of slow worms, buzzards and a barn owl which are all protected under the Wildlife & Countryside Act 1981

### **Insufficient time for feedback**

With such a large-scale development, and volume of accompanying documentation relating to the planning proposal, the deadline for comments is unacceptable, bearing in mind the potential impact of this development on the local environment. As full-time working individuals, being designated Key Workers during the COVID-19 pandemic, it has not been possible to review all the documentation and respond in the amount of time that has been given. The comments provided here are based on only a few of over 60 documents that are listed.





7<sup>th</sup> March 2022

Good Afternoon Tracey,

I refer to my attached letter of 19<sup>th</sup> April 2021, in which I object to Persimmon's planning application (Ref 20/00759/FUL) on behalf of Bloor Homes. The objection was submitted at a time when Bloor had concerns around the comprehensive delivery of Elms Park in the absence of a Collaboration Agreement with Persimmon Homes.

I am pleased to confirm, that as of today, Bloor has entered into a Collaboration Agreement with Persimmon Homes that provides us with the confidence we require that Planning Application 20/00579/FUL (Persimmons 265 dwelling scheme) will not prejudice the comprehensive development of the wider Elms Park scheme. We are happy that the application is residentially led and as a consortium member we are confident that that the commercial and retail elements of the allocation can be delivered within the wider Elms Park site on consortium land.

It is against this backdrop that I can now confirm on behalf of Bloor Homes, that we would like to withdraw our objection.

Yours sincerely

**Spencer Claye**  
Senior Planning and Development Director

50 YEARS  
& COUNTING

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