

Objection to planning Application 20/00759/FUL

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

Elms Park Phase 1



From Save the Countryside

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Summary:

Save the Countryside provide the following statements of objection to the 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.

As this is the first phase of the overall Elms Park development, the time allocated for responses considering the 65 associated documents was not sufficient so additional comments may be submitted as more evidence arises.

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.

Details of specific objections

1. Sustainable Development

As mentioned above, 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 / 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.