

## **SWINDON PARISH COUNCIL**

# **Comments on Planning Application 20/00759/FUL**

### **Summary**

Swindon Parish Council is disappointed that some substantial comments previously raised by the Parish Council remain unresolved. Swindon Parish Council still objects to this planning application.

We remain disappointed at the lack of collaborative discussion, engagement and publicity from the developer for this updated application.

### **Alignment With Outline Application & Phasing**

1. The proposal continues to rely on commitments made in the Elms Park outline application (16/02000/OUT). We do not accept this full application for Phase 1 should be reliant on the parameters of an outline application which has yet to be determined. There is considerable risk that the outline application will not achieve consent or that consent will be given with parameters different to those on which this full application relies.
2. Swindon Parish Council continues to request a updated Design and Access Statement for not only this specific application but an updated design brief for the entirety of Elms Park which details the requirements, in terms of supporting infrastructure, sustainability and other commitments, for different phases of the complete development.

### **Traffic & Access & Sustainable transport**

1. The traffic assessment fails to validate (through lack of appropriate and realistic modelling) that the existing road network (including Manor Road) will not be adversely impacted by the development.
  - a. The detailed LinSig Model (presented in Appendix F) does not include the junction with the Tewksbury Road, which is capacity limited. Therefore, the assumptions regarding traffic flow departing south from the junction are incorrect. This stretch of road already experiences significant congestion during peak times due to the lack of capacity for traffic to exit onto Tewksbury Road. The model must be updated to include this constraint.
  - b. The model fails to incorporate the impact of COVID-19 on model shift.
  - c. The traffic assessment fails to include local, committed developments which we expect to have a significant impact on traffic and congestion. This has been raised previously but has not yet been addressed.
  - d. The modelling only considers a single scenario and does not provide any sensitivity modelling to identify cliff-edge effects.

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### **Signals on junction of Manor Road / Runnings Road**

The proposal to add signals at this junction will create unacceptable delays to people driving in / out of Swindon village, especially when taken with the creation of a new roundabout and two signalised crossings on Manor Rd. This is one of two main routes in/out of the village and at busy times cars can be queuing from the lights at Tewkesbury Road all the way to Runnings Road and sometimes beyond. The traffic study was conducted on a Tuesday and isn't reflective of these busy periods which often happen on Fridays / bank holidays.

An alternative solution that we believe will be safer for pedestrians and wheelchair users and improve traffic flow, would be to amend the existing T junction with priority from Manor Road into Runnings Road turning right. In addition, provision should be made of wider footpaths along the junction area plus a Zebra crossing further up Manor Road towards Swindon Village.

### **Cycleway**

We support the ambition to upgrade the cycleway and create a network of uninterrupted active travel corridors from the proposed development to other sites such as the retail park and further down the Tewkesbury Road towards Cheltenham town. However, the proposed cycleway has a number of issues.

In addition, this application must include details of how the cycleway provision will specifically link up with the wider cycle network in the surrounding area including those already proposed within the M5 J 10 improvement scheme.

The proposed cycle infrastructure and connections to the existing cycle network is incomplete. The design is undesirable and, in practice, unusable for cycles and other non-motorised modes of transport.

The section of Manor Road from the junction with Runnings Road to the roundabout by the entrance to the retail park is approximately 384m and currently takes less than one minute by bike on the road (Strava data has times as low as 28 seconds). The proposals for two toucan crossings on this stretch would introduce unacceptable delays. In addition the proposed shared path is narrow and the crossings would create tight turns at these points of 90 degrees, which would be even more difficult in non-standard cycles.

The crossing of the proposed cycle route at the entrance to the retail park is also likely to present safety concerns. An uncontrolled crossing at the entrance / exit of a roundabout is inappropriate given the volumes of traffic expected, particularly if planning application 21/02120/FUL (drive-through restaurant) is approved.

The diagram on page 30 of the document Response to GCC Consultation states that no amendments to the crossing at the junction of Manor Road / Tewkesbury Road are proposed. However, this is currently a puffin crossing and is therefore not accessible to cyclists. In addition, those heading North on Tewkesbury Road or continuing West onto Hayden Road would be required to dismount to continue their journeys beyond Manor Road.

As a whole, therefore, the above points would create unacceptable delays with up to 6 crossings of the carriageway in a stretch of road less than 500m, which on the road currently takes a couple of minutes. This would lead to many either choosing not to cycle, or to remain on the road where their safety is risked by drivers who perceive they should be on the cycle path provided.

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The proposed cycle route to/from the development on Manor Road does not consider cyclists continuing past the access road and into Swindon Village, which is a popular leisure cycling route as well as providing a main route for commuting. The shared path heading East on the North side of Manor Road terminates just before the roundabout, forcing cyclists to join traffic at a pinch point. From the other direction, cyclists turning into Manor Road from Runnings Road will be on the south side of Manor road, and unable to join the shared path without crossing oncoming traffic, until the point of the first Toucan crossing. This will create a situation where there are potentially cyclists both on the road and on the shared path, creating confusion.

A better option would be to provide a continuous dedicated route on one side of Manor Road, with dedicated crossings at the development access road and into the retail park, and with clear onward progression at both ends of Manor Road.

Within the development itself, the revision from a two way cycleway to one way cycleways on either side of the spine road is welcome. However there must be provision for those heading north to be able to exit the cycleway to turn right into any of the roads leading from the spine road, for example drop kerbs or exits from a segregated cycleway.

### **Footpath along Manor Road**

The proposed footpath on to the North of Manor Road is welcome as an improved route to the local primary school. Further provision of an active travel corridor along this route would also be welcome, as it would be an ideal cycling distance to school.

The developer has reduced the width of the footpath along Manor Road to the South East of the development (plots 26-34) to allow for the provision of a cycle path. The footpath must maintain a minimum width (approx. 2 metres) suitable for pedestrians to pass a wheelchair / pushchair safely. The footpath must extend to meet the existing footpath at the rear of the existing Carpet Right store. The cycle path must be extended to connect with the existing cycle path on Tewkesbury Road.

### **The public right of way through the development**

This is a popular walking route to the retail park and there should be a crossing of the spine road along the right of way.

### **Flooding & Ground Conditions**

While we note the inclusion of the revised drainage strategy, we expect to see the strategy substantiated by a detailed modelling to show the impact of the proposed design on existing and proposed residential and commercial properties and the existing watercourses.

### **Sustainability**

According to outline plans in accordance with the Joint Core Strategy, the Elms Park development was promoted to us as sustainable. We do not feel that our previous comments have been incorporated in the updated documents. In light of the net zero commitment by 2030 that Cheltenham Borough Council has given it is imperative that this development leads the way as the first phase of Elms park to achieve that ambition.

As a minimum we expect:

- Sustainable heating solutions as opposed to the use of gas boilers.

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- The energy efficient heating systems should be compatible for conversion to hydrogen.
- Provision of PV generation for all homes. In addition the provision of PV in public areas to provide green energy for public areas.
- The provision of electric car charge points at all houses is welcome however the same should be installed for all public parking spaces.

### **Education**

The provision of sufficient capacity at Education facilities is a key pre requisite of this proposed sustainable development. Some statements made in the Elms park application are historic and inaccurate.

The development should either include provision of a new primary school or facilitate additional capacity at the existing Swindon Village Primary School, the only school within walking distance. We also understand that the nearest secondary school (All Saints Academy) is also at capacity.

Response to GCC Consultation, Section 3.2.1:

*"It has been confirmed that there is local education capacity to accommodate the proposed Development".*

If this is referring to available capacity at Swindon Village School, this is contrary to the engagement Swindon Parish Council has had with the school. Please see the attached letter. No other local primary schools fall within the acceptable walking distance to primary school education.

*". In the longer term, new primary and secondary schools will be provided within the Elms Park development."*

This claim cannot be substantiated. The Elms Park development has not been granted outline planning permission. Until this occurs, so benefit cannot be claimed from future school provision.

Response to GCC Consultation page 3 states that "Comments from the Education Authority confirm that there is no immediate capacity at this school to cater for the increased number of pupils that this site generates, therefore pupils will be displaced to more distant schools in the absence of a new education facility placing further burden on the transport network as the walking distances would be excessive."

It is not clear therefore how the applicant goes on to say "It has been confirmed that there is local education capacity to accommodate the proposed development. In the longer term, new primary and secondary schools will be provided within the Elms Park development". It would appear that the applicant is relying upon the provision in the wider Elms Park, which is yet to be determined and therefore should not be relied upon.

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### **Design, Visual Impact & Heritage**

#### **Increase in Development Density**

There has been an increase in the development density by replacing smaller units with larger house types and by removing the curtilage parking from many of the plots which has resulted in an increase in the number of on-road parking spaces.

#### **Dog Bark Lane Street Scene D-D (previously Street Scene 8)**

In our previous comments we requested that the houses along Dog Bark Lane were reduced from 2.5 storey to 2 storey. We are very disappointed to see that these comments were ignored, and in fact, the reverse was done so that buildings were increased to 3 storeys. We object to the increased density and taller buildings proposed in the revised scheme for Dog Bark Lane and we ask again that the height be reduced to 2 storeys. Dog Bark Lane is an important community asset at the very heart of the parish landscape so 3 storey building provision significantly degrades the visual aesthetics.

In our previous statement we had not been against three storey units along Manor Road but had requested a more sympathetic approach to this edge of the development which is close to the Conservation Area of the village.

The area enclosing the SUDS pond has been increased which has led to a 'squeezing' of the properties between the SUDS pond and Manor Road.

To avoid a reduction in development density along this route the developer has removed all two storey dwellings and the gaps between them and has replaced them with three storey houses that do not have sufficient space between them for cars to park.

The result of this is to create a hard urban edge along the most important of development boundaries where the maximum emphasis should be on creating a link between the existing Village setting and the proposed development.

We also note that the three storey houses contain a high percentage of Wykeham house types which have a balcony at second floor level. At that height they will have a direct view towards the sides of the existing houses to the North of Dog Bark Lane

With a development site of this size there are a number of areas where the density of the buildings can be increased and where the location of denser development is less sensitive.

We request that this is reviewed and would like to see the reinstatement of two storey houses.

The street scenes and the layout plans conflict. The flats are shown with flat roofs in the street scene and are shown with pitched roofs in the layout plans. We request that all flats have pitched roofs in keeping with other residential buildings in the rest of the parish.

We are also concerned that some of the larger houses in the development no longer have any on plot parking or integral garages. With the latest planning requirement that all new individual houses are to have their own electric vehicle charging point the revision to the layout and loss of curtilage parking could result in charging leads along footpaths and cycle ways becoming a dangerous obstacle.

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### **River Swilgate – Street Scene E-E (previously Street Scene 7)**

We note that the density of units along Street Scene E-E has also increased because of the use of units with a larger floor plan. We also note that the originally intended 3 storey units have been removed.

Despite the reference to the River Swilgate, Street Scene E-E is set a long way back from this very important watercourse. Whilst we welcome the removal of the three storey units and accept an increase in the development density in this location, we also feel that this treatment should extend along Street Scene D-D. (Dog Bark Lane)

### **Materials**

We welcome the confirmation of the use of more sustainable and low maintenance materials.

### **Design statement**

We note that the existing design statement document dated 13<sup>th</sup> May 2020 has been superseded but a replacement has not been included. This must be rectified.

### **Biodiversity**

This development provides an opportunity to significantly improve the biodiversity in the parish and set the standard for the wider Elms Park development and developments within the Joint Core Strategy area.

The hedgerow along manor road is an important divider between commercial and residential areas and provides appropriate screening as well as being a protected habitat. We request that removal of hedgerows are minimised, and that any loss is replaced.

### **Ecology**

We reference the Ecology comments on 1<sup>st</sup> December 2021. We are disappointed that the comments regarding reptiles not being mentioned in the report have still not been actioned.

### **Revised Arbocultural Statement**

We request that this is updated with specific volumes and species of trees in identified locations

As more detail on tree planting is included Swindon Parish Council would like to be included in the consultation.

### **Street Naming, Lighting and Signage**

Swindon Parish Council request to be consulted in these matters before decisions are made.