

Swindon Parish Council

NOTE The Parish Council is not able to meet before 12th April. These comments are submitted as draft as the formal deadline for comments is 11th April. The meeting on the 12th April will finalise the comments and will be open to the public.

Opening Statement on Planning Application 23/0354/OUT

This planning application must not be reviewed in isolation. It must be reviewed alongside the neighbouring development of the North West Cheltenham Joint Core Strategy (JCS) phase 1 of 260 homes to ensure that it meets the requirements detailed in the JCS.

The Swindon Parish Council have serious concerns with this application and request that the application is reviewed by a planning committee so that any concerns raised can be discussed in that forum.

Traffic

Road access – Quat Goose Lane

According to the North West Cheltenham Policy A4 it clearly states the requirement regarding access for the North West Cheltenham/Elms Park development that includes the land on Home Farm. The Strategic Allocation identified at Northwest Cheltenham will be expected to deliver:

xi. Primary vehicle accesses from the A4019 Tewkesbury Road, secondary access from Runnings Road / Manor Road, and ***public transport only access to Swindon Village via Quat Goose Lane***"

The North West Cheltenham (JCS) along with the outline planning application for Elms Park development clearly stated that only public transport vehicle access would be granted from Quat Goose Lane. It is clear the strategy adopted by the JCS partner councils does not permit this development from going ahead in its current form. The use of Quat Goose Lane as the only entrance/exit for all public vehicular traffic is specifically prohibited by the policy. Despite the comments in section 4.5 of the Transport statement - Quat Goose Lane must only be used for bus and emergency vehicle access – there are solid, practical reasons for the JCS taking this position, in terms of the unsuitable minor village road, existing congestion, pedestrian safety, among other considerations.

The application states in 7.3 It is acknowledged that policy A4 states that Quat Goose Lane should be used for public transport only. The Swindon Parish Council does not agree that the North West Cheltenham JCS policy A4 xi was only to prevent vehicle access through Swindon Village to Elms Park, but it was also in recognition that the road network in Swindon Village was not suitable for additional vehicles. It is the view of Swindon Parish Council that this housing development must not be started without appropriate road infrastructure known as the spine road from Tewkesbury Road through Elms Park development to support safe vehicle access to this development.

In the Planning Statement – Policy Strategy Allocations Policy criteria 8 states 'The application site supports the intention of this policy as permanent access is proposed via Quat Goose Lane and prohibits private vehicle access to the Elms Park site. Otherwise, the proposed development would be unnecessarily delayed and held to ransom by the delivery of the wider master plan'. The delivery of the North West Strategy 'master plan' is critical to ensure safe access to the new development through a coordinated transport plan and with the infrastructure is in place to support the residents of the new houses. It is also critical to meet the transport strategy of encouraging walking, cycling and the use of public transport.

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Road width - Quat Goose Lane (see photos in Appendix B)

Appendix A HS2 Rural Road design criteria state that the minimum width for a two-way traffic road is 5.5m and for roads used by buses should be 6 metres (reference Department for Transport – Manual for Streets), however Quat Goose Lane is only 4.4m wide near the junction with Sumner Court. This is due to this road being an original village road, bounded by long established properties with no room for a wider road for a significant section of Quat Goose Lane. This constricted road is already physically too narrow for two cars to pass safely and requires careful navigation, even with the current levels of relatively low traffic. And when the regular bus service passes through that part of Quat Goose Lane, it is the only vehicle that can transit that point. Refuge vehicles and emergency services vehicles struggle with the narrow road and the manoeuvring around any parked cars.

The proposed access road to the proposed development would require vehicles to take a series of blind 90-degree bends with no street lighting which would result in a higher risk of accidents. These bends in the road are because of ancient village routes being utilised over time and now not being suitable for medium-high traffic throughput. These danger points in the village are areas where road traffic near-misses regularly occur with current traffic levels.

The volume of traffic using Quat Goose Lane and the neighbouring roads Church Road, Dark Lane, Riverlands Roads will be completely unsustainable – nearly every day at peak times there is gridlock traffic heading down Manor Road towards Runnings Road up towards the narrow point/single vehicle width at the bridge over River Swilgate.

Surrounding Road Network

There is no consideration for the wider impact of the additional vehicular traffic in the surrounding roads which are already constrained by a level crossing at Swindon Lane, the infamous Low Bridge at Hyde Lane and dangerously narrow Humpback bridge on Swindon Road. All this is accentuated by the ever-increasing traffic from Wymans Lane and Kingsditch Lane towards Tewkesbury Road generated by visitors to the Kingsditch Retail Park.

Church Road (see photos in Appendix A)

Church Road is already a high use and high-risk road, especially at school and playgroup (located at Swindon Village Hall) drop-off/pick-up times where illegal/dangerous parking occurs twice every day, which results in road traffic accident near-misses on a regular basis. The junction between Church Road and Quat Goose Lane is often made nearly impassable by the parked cars during these times who are forced to parked actually on the junction itself, in contravention of the Highway Code. With an additional 223 cars (conservative estimate) trying to access the new proprieties via this route it will severely add to the existing congestion and significantly increase the risk of injury to the children and parents trying to make their way to and from school.

Tewkesbury Road

The GCC Highways response to 20/00759FUL in January 2023 states that for the development of 260 house in phase 1 of the North West Cheltenham development that 'The proposal must consider the impact on the A4019 junction and Junction 10 improvement scheme which has been granted HIF funding to help to release additional housing growth in the area. Whilst the impact of this scheme alone is not significant considered alongside the other growth in the JCS and the strategic allocations and cumulatively it adversely impacts network capacity. It is therefore necessary and reasonable for it to make contributions towards the junction 10 scheme'. It is the Swindon Parish Council's view that the additional

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houses planned on the Home Farm site would need the Junction 10 improvements in place to ensure that the increased traffic did not have an adverse impact on the network capacity.

National highways recommended that planning condition should be attached to any permission that TBC is minded to grant in respect of application 16/0200/OUT. These are as followed

- (a) No more than 260 dwellings of the development hereby permitted shall be occupied unless or until the improvement scheme identified for M5 junction 10.

Reason – To offset development traffic impacts at the M5 J10. To ensure the safe and efficient operation of the SRN.

The additional 180 houses proposed in this development would be in addition to the agreed 260 and therefore exceed the recommended impact on M5 J10 until the improvements are made to the junction.

Footpaths – Quat Goose Lane

It is noted in the Transport Statement Walking Audit 4.3 that 'For the most part footways are provided on both sides of the carriageway' but this does mean that pedestrians are in places forced to walk in the road which will be carrying a large volume of traffic if the main access route to the development is via Quat Goose Lane.

Bus Routes

Table 3.2 Summary of Bus Route H states in the Transport Statement that on Sunday's there is a bus every 30 minutes. As of the 27 November 2022 the H bus does not come into Swindon Village on a Sunday and the nearest stop is Wymans Brook Stanwick Gardens. It also ceases service to the village after 7pm on Monday - Saturday. This has sustainability implications for existing village residents, which would be compounded by any new potential residents.

Road Safety

Using a national prediction of average car ownership ([Nimblefins](#)) of 1.33 cars per household we expect additional 223 cars plus visitors, which is a conservative estimate. Therefore, Swindon Parish Council does not agree with the statement of 'low traffic volumes' in 6.24 that 'Due to the low traffic volumes associated with the proposed development it is considered that the access could be designed to encourage low speeds and create an attractive public realm for pedestrians and cyclists'.

As detailed in the transport statement para 2.33 and 2.36 there were 14 accidents (2 with serious injuries) in the last 5 years. Swindon Parish Council have concerns this would probably increase and the associated second order fiscal and social implications. Results showed an approximately linear relationship between traffic volume and accident frequency at lower traffic volumes. (source National Library of Medicine [Relationship Between Traffic Volume and Accident Frequency at Intersections - PMC \(nih.gov\)](#))

Pedestrian access onto Brookhampton Lane

Brockhampton Lane is a single-track national speed limit lane with no footpaths and street lighting, which is used on daily basis by a range of numerous users (cars, commercial vans, heavy lorries, bikes, walkers, runners and horses). It is therefore of significant concern to the Swindon Parish Council that these proposed plans will direct new residents and their

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children onto a National Speed Limit Road as a walking route to school and to access the play park- again that has no footpath or lighting.

Brockhampton Lane already suffers from significant safety issues relating to excessive high-speed driving and use by oversized vehicles, that often risks the other road users which includes numerous pedestrians (often with dogs), many horse riders and disabled users, all of whom are using a minor road that has no pathways. Brockhampton Lane is a key resource and asset to the village because it is the key access to the countryside.

Summary of pedestrian and cycling audits in the area surrounding the proposed Home Farm Development

In the section 6.3 'The residential streets within Swindon Village generally scored well in both the walking and cycling audits. This is due to the current low traffic speeds and volumes - this important scoring will not remain low with the addition of the 180 houses and the associated vehicles levels.

The GSC Highways Department response to 20/00759/FUL stated 'The route quality to Swindon Village primary school is also poor with narrow footpaths and lack of street lighting'.

Transport modelling detailed in the application presents a false picture of limited impact

There are some 325 houses in the core portion of the village that is in the immediate area adjacent to the proposed development. A **55%** increase in homes will have an enormous impact on the roads in the area. The feeder roads in the surrounding area will not be able to safely manage this increased volume as they would be forced to operate well beyond their safe parameters. This increase would be in addition to the 30 houses built across the parish in the last few years on Apple Blossom Drive, Manor Farm and Saint Lawrence Court, which will have already added load onto traffic situation the village.

Table 7.2 details the Person trip generation suggests 204 increased person trips in the morning and 184 trips in the afternoon/evening – this is a huge increase on the current traffic levels.

While the Swindon Parish Council acknowledges the working from home trends in table 7.7, we are aware that most employers in the local area and commuter distance are encouraging people to return to the office and at least to adopt hybrid working between home and office, which means traffic levels will only increase over time. In this area with relatively extremely poor public transport, it is expected that most people will be commuting using private cars.

The statement 8.5 is incorrect - traffic at the junctions between Dark Lane and Stanton's Drive and Quat Goose Lane and Dark Lane would not remain low without the required spine road, as these are identified in the design and access statement as the main access routes to the development.

Table 9.1 is unclear - we ask that this is presented in a clear way for readers to understand.

National Planning Policy Framework (NPPF)

The NPPF states in 3.4 that in assessing that may be allocated for development in plans or specific applications for development it should be ensured that:

(b) Safe and suitable access to the site can be achieved for all users

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With the increased vehicles on minor narrow village roads, we believe that the access road of Quat Goose Lane does not meet the criteria of a safe and suitable access to the site.

Furthermore, paragraph 111 of the NPPF states that: "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe". It is the Swindon Parish Council view that this development would definitely have an unacceptable impact on highway safety and the residual cumulative impacts on the road network would be severe.

Emergency Access

In 4.7 it states that 'Emergency Vehicle access will be also provided onto Brockhampton Lane' There is no indication on the plan to how this access would be manned is it a locked gate or a bollard. There is no reason in the report to why this is required, and it is not a standard feature of the new development. The Swindon Parish Council needs to see the details of this to be able to make a complete comment.

The Brockhampton Lane is a single-track road and there is no obvious reason to why an Emergency Vehicle access needs to be taken from this road. There is valid concern from the residents located close to this proposed access that over time it would become opened to private residents resulting in increased traffic at a dangerous point in a single track lane. We would like to understand the need for this Emergency Vehicle Access.

Local Highways Assessment Methodology – Modelling

In paragraph 8.5 it is stated that 'The Quat Goose Lane/Dark Lane priority junction and Dark Lane/ Stantons Drive priority junction have not been modelled as the traffic volumes using these junctions is currently and will remain low. With the access to the new development using both Quat Goose Lane and Dark Lane and the expected 55% increase in the numbers of vehicles using these roads we dispute the statement that 'they will remain low'.

Working from Home Trends

The working from home data in table 7.7 in section 7.19 has showed an increase to 22% in the numbers of people working from home at least one day week in September 2022. The move to hybrid working is only possible in certain industries and the businesses that are local to this development – retail and industrial are the least likely to have home working options.

Cheltenham Town Training Ground/Facilities – Quat Goose Lane

This facility is used extensively over the weekend and the majority of those coming to train or play at the facility are outside the village and therefore come in either a car or coach. This results in heavy flows of traffic and major congestion in this section of Quat Goose Lane, where often unsafe street parking occurs during match times due to capacity issues in the training ground car park. This results in the traffic manoeuvring along Quat Goose Lane around numerous parked cars to exit or enter the village.

Noise or disturbance from the development

Pollution and Traffic noise – Quat Goose Lane and Dark Lane

Roadway noise is the collective sound energy emanating from motor vehicles. It consists chiefly of road surface, tire, engine/transmission, aerodynamic and braking elements. It is

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the most prevalent form of environmental noise. It is stated in the Transport Statement 4.4 that 'Quat Goose Lane scores well for traffic noise and pollution as low traffic volumes do not affect the attractiveness of the environment'. The same assessment was made of Dark Lane. In the Article 'How much air pollution comes from cars' July 2021 it states that there are 3 major pollutants from cars Particulate matters, Carbon Monoxide and Nitrogen dioxide – it is believed that these can have a contributing effect on people's health. With the increased traffic using these roads it is our believe that it will have a negative effect on resident's health due to the noise and pollution.

The existing surrounding area in the heart of the village comprises 325 properties and using the recognised calculation of 1.24 cars per household that means there will be an increase from 403 to 626 cars using these roads. The increased volumes of traffic because of the development will increase the traffic noise and pollution for the residents on Quat Goose Lane, Dark Lane and the surrounding roads.

Amenity

Education

The provision of sufficient education facilities is a key prerequisite of this proposed sustainable development of North West Cheltenham strategy. The local primary school Swindon Village is already full and the Swindon Parish Council have stated in the response to 20/00759/FUL Elms Park 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." 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/North West development although this claim cannot be substantiated. The Elms Park/North West development has not been granted outline planning permission. Until this occurs, so benefit cannot be claimed from future school provision. There is also a traffic and sustainability issue related to the provision of education.

Health care facilities

There is no indication in the planning application to where the new residents in the development would access health care facilities. There is no doctor's surgery in the village and therefore residents already need to drive or use public transport to access these services. With a range of properties including three bedroom houses it can be expected that the average occupancy on the development would be close to the national average of 2.4 people per house ([ONS data](#)). This would result in at least 360 individuals needed to access health care from the surrounding GP practices, which are already operating at full capacity and would probably not be able to take on new patients.

There is already pressure on the resources in Cheltenham and Gloucester hospitals and these would need to be expanded to cope with these additional residents.

Shops and Facilities

There is no local shop, pub or restaurant in the village. In table 6.1 Initiatives and Measures item 18 states that 'Internet access in all homes giving residents easy access to home delivery services. These home delivery services will result in more journeys on the access road into the development. With the development containing many family houses it is highly

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unlikely that most families would walk the 1500 metres (as stated in Table 3.1 Local facilities within 2 km of the site) to the nearest shop to undertake a weekly shop.

It is worth noting that in this table 3.1 that is listed Seasons Business and Leisure Complex this has been for many years the Cheltenham Town Training Ground and Facilities. It is not a facility accessible to most of the residents.

It is also worth noting the closest pharmacy is 1900 metres from the site and that no health care facilities are within a 2km radius of the site.

Privacy

There will be an impact on the privacy for a number of existing residents on Quat Goose Lane whose back gardens would be surrounded by the proposed development. The existing houses closest to the proposed pedestrian and emergency access path will have people being able to look directly into their houses which is a security and privacy concern, as well as easy unauthorised access these existing residential gardens by climbing over the established small walls and fences. Although the plans show a native woodland will be planted in this area it will take many years to establish and is unlikely to effectively address the privacy issue.

Lighting

Swindon Village decided over 50 years ago to be a 'dark village' with minimum street lighting – it is expected that no streetlights will be included in the proposed development, however in the Transport Statement there is a reference to a proposed lighting design.

In the Designer Response to the Stage 1 Road Safety Audit in Appendix C of the Transport Statement states that:

RSA Problem 2.1 'The widened and extended section of Quat Goose Lane is currently not illuminated, and no lightening details have been provided for the scheme at this stage. Given the size of the development, this section of Quat Goose Lane will see a significant increase in traffic flows and in combination with a lack of illumination there may be a risk of darkness related collisions between all road users. The RSA recommendation is that 'A detailed design stage street lighting should be provided' and the Design Organisation response is 'Details of street lighting will be set out at the detailed design stage'.

The Home Farm Road Safety Audit Stage 1 rates Quat Goose Lane as a Medium risk rating due to the lack of street lighting.

Swindon Village has opposed street lighting due to the cost of provision, the need to reduce the dependence on fossil fuels – to further support the CBC policy of a move to Net Zero and the effects of light pollution on the local green areas.

Biodiversity

In reviewing the report, it is the Swindon Parish Council view that this does not contain all recorded reports of wildlife in the area and would request that this is updated.

As the proposed development is within 15.4km zone of influence on the Cotswold Beechwoods SAC we would support the Gloucestershire Wildlife Trust and Natural England request that a Habitats Regulations Assessment is completed to outline the possible impact on the SAC from the development.

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The Swindon Parish Council supports the request from the County Archaeology in response to this application that more investigations of the site are required inline with the National Planning Policy Framework which are important in a area recognised for its late Iron Age and Roman activity.

Flooding – (see photos in Appendix C)

Like many areas these days, flooding is an issue and the Home Farm field is no different, which regularly floods and then drains into the nearby tributary streams as it should for agricultural use. The proposed housing is placed very near the portion of the Home Farm field that floods and the man-made structures will likely disrupt the natural flood and drain process that exists today. The flooding is such that it is not unusual for Brockhampton Lane to become flooded due to the draining flood water to overwhelm the nearby minor tributary streams.

The proposed develop will likely only make flooding worse and bring new flooding to the area that cause fiscal and social harm to the community, including an increased risk that the local council and highways will have to carry.

The flood risk can be clearly see on the EA surface water flood risk map <https://check-long-term-flood-risk.service.gov.uk/map?eastings=393480.21&northing=225446.48&map=SurfaceWater>

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Appendix A – Road congestion – Quat Goose Lane junction with Church Road (March 2023)



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Appendix B – Quat Goose Lane – Narrow road with on road parking (March 2023)



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Appendix C – Flooding on proposed fields and Brockhampton Lane (March 2023)



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