

Objection to the Outline Planning Application on Brizen Farm - 13/00415/OUT


Dear Mr White,

Can I please submit my objection to the outline planning application on Brizen Farm - 13/00415/OUT

Green Belt

This is a valuable part of the Tewkesbury/Cheltenham Greenbelt separating Leckhampton and Shurdington and marked 'RED' no development by the recent JCS AMEC Greenbelt assessment. The new National Planning Policy Framework (NPPF) published in March of 2012 makes the protection of the greenbelt absolutely clear, ' ⁷⁹The 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.'

Table 1. The Green Belt serves five important purposes ^{NPPF 80}

<p>to check the unrestricted sprawl of large built-up areas;</p>	<p>Development at Brizen Farm could easily result in follow-on development onto adjacent areas; this whole area has been the subject of other speculative planning applications. Bill boards on the Green Belt in this area have been encouraging land speculation.</p>
<p>to prevent neighbouring towns merging into one another;</p>	<p>The Green Belt separating Leckhampton & Shurdington is only 1000m in width, measured from the roundabout on the A46 & Up Hatherley Way down to the heavily congested A46/Leckhampton Lane junction, ribbon development on the A46 already threatens to merge Leckhampton with Shurdington.</p> 

to assist in safeguarding the countryside from encroachment;	This area is valuable farmland and residents greatly appreciate this open area of the Greenbelt. Many people enjoy the walk from Leckhampton, past the cricket ground to Shurdington. This development would also urbanise part of the Cheltenham Circular Walk.
to preserve the setting and special character of historic towns; and	The listed building of Brizen Farm is of special historic value and provides a setting to the entrance to Cheltenham and the views up to Leckhampton Hill and the AONB Cotswold escarpment.
to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	Particularly important in the JCS area where councils have established a vision for town & city regeneration. Urban regeneration should be further promoted, to build affordable homes, affordable rental and social housing, where they are most needed. Built where land prices make these homes viable and to avoid profit led market housing. Green Field Development not linked to jobs which will encourage dormitory urban extensions.

In an open letter, the then Parliamentary under Secretary of State for Department of Communities and Local Government, Bob Neill, March 2012 on the new NPPF, stated, *'The Coalition Government's planning reforms do place a stronger emphasis on councils to draw up a local plan and determine where or where not development should go. This should include protection of the open countryside and a proper assessment of how brownfield land can be brought back into use. However, localism cuts both ways, councils can no longer hide behind quangos or central government. I would add that our proposed reforms on Neighbourhood Planning will devolve power down from Councils down further to local parishes and neighbourhoods'.*

On the subject of localism, a two day exhibition was held in early December 2012 at the Reddings Cricket Club on this Brizen Farm proposal, the Parish Council & LEGLAG organised an exit poll to gauge public opinion on this controversial greenbelt development; 198 people attended with 186 opposed the plans with only 7 in support - **94% of local residents were against the development proposals, with only 3.5% in favour.**

Transport Plan

Those who travel the A46 will know this entry point into Cheltenham is finely balanced and only just coping with the volume of traffic at peak times. In this Brizen Farm proposal the developer was forced into admitted the highway network was at capacity and fell back on the argument that they would try to avoid worsening a poor situation.

Paragraphs 5.25 and 5.28 of the applicant's Transport Plan indicate that the situation is and will be so bad, that future residents will have to plan their journeys differently, change journey times (cannot work 9-5), use other transport modes, re-route (rat-running via Church Rd or past Bournside School) or suffer the consequences. It is difficult to see how vague plans to increase public transport provision or residential travel plan measures will fix an already 'failing network', a network that will be put under more pressure if this development were to be permitted. The simple assessment of the applicant's own transport plan tells residents what they already know, that the network in this area just cannot cope with additional traffic on the Shurdington Road corridor.

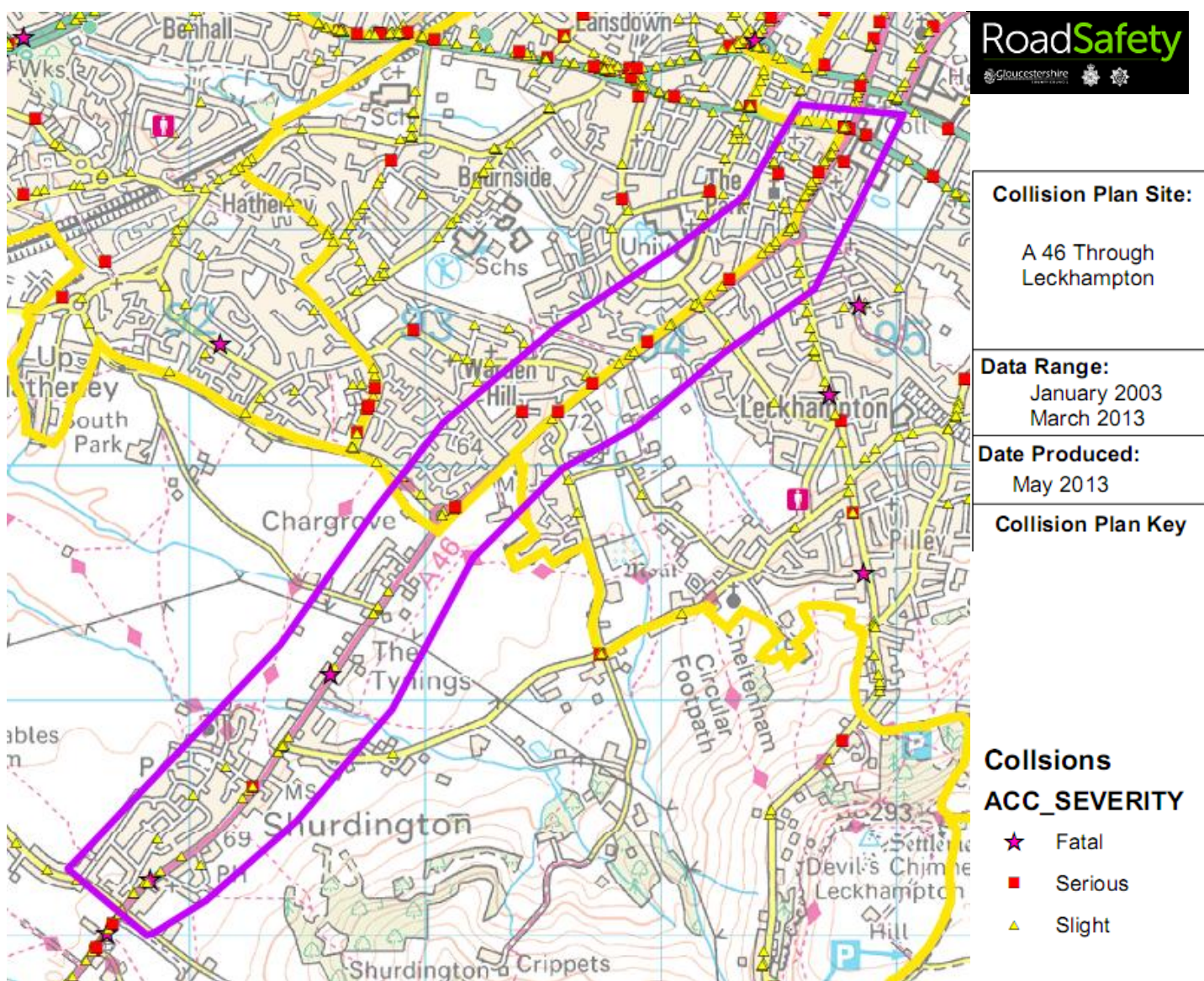
If housing development continues to the south of Cheltenham, along the A46 in the Leckhampton and Shurdington area it is likely that morning traffic queues will regularly extend onto the A417 and seriously impact jobs in the town, (see the traffic analysis in the LwWH Parish Council Neighbourhood Planning Document for the complete evidence). Looking towards the town, the Bath Road from the Norwood Arms to the town centre, again seriously congested with delivery lorries, buses and slow moving traffic. There is no viable solution, widening the road is not feasible due to existing built-up stretches along most of the A46 Bath Rd.

Some of the A46 traffic turns off into Leckhampton Lane and along Church Road, as a 'rat-run' towards Charlton Kings. The volume of this traffic jumped by 30% when the Brockworth bypass was opened 11 years ago. Traffic is further squeezed by the parked cars at the urban end, and frustrated drivers pose a real danger to the Primary

School children in the mornings. Traffic experts and county highway engineers have acknowledged that Church Road just cannot cope with any more vehicles and junctions are at capacity.

More traffic means more air pollution. Measured against EU standards, levels are already unacceptably high on Church Road and at the A46 Moorend Road junction, regularly breaking NO₂ limits in the winter. CBC is very concerned on the increasing pollution in the town and has installed additional air quality monitors at these points and others. The whole town was recently declared an Air Quality Management Zone (AQMZ) to seek solutions, large scale development is NOT a solution it would of course compound the problem. Meanwhile, the JCS transport plan is delayed until January 2014, not available for this consultation.

The 10 year collision statistics provided by the County Accident Investigation and Prevention Road Safety Partnership shown below demonstrate a strong pattern in the accident statistics, of the 9 serious and 2 fatal accidents, these involved 4 cycles, 3 motorcycles, 3 pedestrians and only one serious accident was restricted to cars. This highlights the need for the separation of road users and other highway safety measures if the applicant's shift in transport mode is to be successful, the collision statistics also demonstrate the network is at capacity or near capacity.



Increased Flood Risk

The proposed development lies within the influence of a limestone hill that is overlaid with impermeable clay. The hill is peppered with springs with two main water courses, Hatherley brook and Ham brook. After heavy rain the ground water running off the hill is able to soak away into the fields east of the A46. During heavy rainfall conditions, even this natural defence is not enough to protect the homes in Warden Hill with over 40 homes flooded in 2007,

they now struggle to get home insurance. In discussion with residents, their homes were flooded not from surface water but from water coming up through the drains, the drainage system failed due to sheer volume of water. In response a £650k flood protection scheme has been put in place, Warden Hill is now better protected; bizarrely all new development proposed for the area is on the other side of this flood barrier and in areas more prone to flooding from surface water.

Climate scientists predict extreme weather patterns will become the norm due to climate change, so these natural soakaways will become even more important. Proposals by developers featuring small 'balancing ponds' are an attempt to mitigate storm effects but this will not handle the 10 year events and development will increase the flood risk across the whole area. A detailed hydrological study carried out in 2010 states that the topography is more significant than the capacity of the brooks to cope with a flood event and the soakaways provide important protection.

The JCS evidence base has provided valuable information on the increasing flood risk to the Leckhampton area and is in agreement with surface flooding experienced by residents in recent decades.

The Gloucester, Cheltenham & Tewkesbury Joint Core Strategy Level 2 Strategic Flood Risk Assessment, HALCROW Summer 2011, report extract covering the Leckhampton area:

- *Significant surface water runoff is generated from the area to the south*
- *Areas of historic flooding identified outside the modelled flood risk areas*
- *Two key risk areas identified along Hatherley Brook (upstream Church Road & rural land adjacent to eastern branch), a number of existing roads affected by flooding*

Hatherley & Ham Brook in Leckhampton is identified as higher flood risk, a hydraulic model of Ham Brook is required, significant surface water runoff and an area of historic flooding, and highways are also affected. The Halcrow report again, *'where historical records show incidents of flooding and surface water, then these areas should be treated as Flood Zone 3a; at risk and not suitable for development. Areas of existing open space acting as informal flood storage areas should be safeguarded from development'*, the open fields at Leckhampton provide important protection of areas to the west of the Shurdington Rd from flood risk due to surface water. Halcrow state that, *'areas of existing open space acting as informal flood storage areas should be safeguarded from development'*.

This is the case in Leckhampton where open land is protecting Warden Hill where flooding has been a serious problem, a minimal flood protection scheme has been put in place on a small section of the Shurdington Road, it is worth noting that all proposed new development is on the other side of this barrier. The area of open countryside adjacent to the flooded area provides important protection to the wider area of Leckhampton Lanes & Warden Hill.

Halcrow again, *'in some areas high hazard surface water risk areas affect locations outside of Flood Zones 2 and 3. Such areas should be treated as Flood Zone 3a with regard to the Sequential Test process'*, the heavy clay soil at Leckhampton regularly floods due to water run-off from Leckhampton hill.

This whole area around Church Road (formally Collum Streete) has had problems with flooding, with tithing records dating back to medieval times due to the proximity of Leckhampton Hill.

Final thought on the JCS and over provision of Housing in Tewkesbury District

Tewkesbury MP Laurence Robertson, at a government debate on Planning, the Countryside and Housing Projections which he held in the House of Commons, 24th Oct. 2013, *'Tewkesbury Borough Council has built 7,500 houses in the last 20 years, but is planning to accommodate a further 18,900 in the next twenty years. I don't believe that this higher figure can be justified'*, and in response to Nick Boles defence of the building plans across much of England, *'... I don't agree with that analysis, certainly we need some development, and there are proposals I am currently supporting, but I don't accept that Tewkesbury Borough, for example, needs to increase its housing stock by 54% over the next twenty years, which, under current proposals, is what will happen'*.

In my view, this level of house building is an over-provision of housing supply and brings the danger of development coming forward too rapidly in less sustainable places (e.g. dispersed, more rural / dormitory settlement locations which all have local requirements) and, through competition effects, diverting development resources (e.g. infrastructure investment) from more sustainable but more difficult to develop places (e.g. inner urban brownfield land, in the continued regeneration policy of Gloucester & Cheltenham). This would result in what were largely intended to meet local growth needs being taken up by a higher proportion of inward migrants and commuters, and resulting in a perpetuation of the dispersed, car dependent settlement growth patterns. Over-provision in general would also place additional strain on existing infrastructure and could lead to investment in new capacity before it is required, representing a waste of scarce resources.

Cllr Ian Bickerton
Leckhampton