

**COTSWOLD DISTRICT COUNCIL SPECIAL COUNCIL MEETING 26<sup>TH</sup> SEPTEMBER 2017:  
CIRENCESTER TOWN COUNCIL SUBMISSION – LAND SOUTH OF CHESTERTON:  
OUTLINE PLANNING APPLICATION REFERENCE 1600054/OUT**

**1. Introduction**

1.1 Chairman, Members, thank you for giving me this opportunity to address this special meeting of the District Council.

1.2 The application before you, if approved, will result in a step-change for Cirencester changing it from a medium-sized Cotswolds market town into a town that might then be viewed as having the potential to expand further to the south and to the east of the current development boundary. Already neighbouring parishes are beginning the difficult task of drawing up Neighbourhood Plans in anticipating this possibility with Cirencester reserving its position that significant housing development over a short period of time is seen by the community as detrimental and which the Town Council will strongly oppose during the local plan period.

**2. The Outline Planning Application and Emerging Local Plan**

2.1 It is right therefore that the application before you will receive the detailed attention and consideration that you will give to it today, suffice to say that the supporting evidence for the application is based partly on fact, and partly on conjecture and hypothesis, as to what these facts convey and the weight to be given to them before irrevocable decisions are made. In summary, however, the Town Council does have concerns with respect to:

- What may appear from the Town Council's own independently conducted research to be an over-reliance on Chesterton, as a single strategic site in meeting and potentially exceeding Cirencester's own housing needs, as contributing by extension (in the absence of other strategic sites and a different policy focus) to meeting the whole District's housing needs; this to be explored further by the Planning Inspector appointed to conduct the Examination in Public of the recently submitted emerging Local Plan.
- The credibility of claims that the number of homes to be built and employment land to be prepared, together with the necessary supporting infrastructure without which the development cannot proceed (notably drainage, highways improvements, town centre traffic mitigation measures and parking, public transport provision and increased public service provision in health, social services, education and recreation), can be delivered in the 12-year window of the Local Plan period between 2018/19 and 2031. Again this is an issue that will be returned to during the Planning Inspector's examination in public on which the viability of the emerging Local Plan as drafted depends.

2.2 The committee might think (and case officers might advise) that today's special meeting is concerned only with the Outline Planning Application and not

with the emerging Local Plan; that this submission should concern itself only with the one and not the other. To which my reply is that the application and plan are inextricably linked, with the one exhibiting great reliance and dependability on the other, so that the consideration of them has to be in parallel and cannot be separated or divorced.

### **3. Planning issues**

3.1 I will now if I may return to highlighting the remaining principal concerns of the Town Council against the background that the Town Council has engaged positively with the developer and the District Council to obtain the best possible outcomes for Cirencester in the event that the application is approved.

3.2 However, at this point I should say that the case officer's report which accompanies the application with which we are concerned today, does take a generous view on the many objections that have been received which quite rightly draw attention to a wide spectrum of concerns ranging from:

- the loss of productive attractive agricultural land immediately adjacent to the Kemble/Ewen SLA but without the benefit of its protection;
- the disturbance of wildlife habitats including many species of birds, bats, dormice and great-crested newts impacting on the biodiversity of the site and its immediate hinterland;
- archaeological constraints imposed by the Scheduled Ancient Monument and the visibility impact of the site on buildings and structures of historic interest some of which are designated and listed as heritage assets;
- drainage and flooding, including the laying of a new sewerage pipeline to connect the development (and some existing properties) to the Thames Water treatment works at Shornecote;
- major infrastructure constraints with regard to the 400kV high voltage overhead power lines, high and medium pressure gas pipelines and associated infrastructure, both of which, electricity and gas, are part of National Grid provision running through the development site which required the original parameter plans for the development to be redrawn to accommodate health and safety concerns but which, through close proximity, have not dispelled those concerns.

3.3 All of these and more have been comprehensively addressed in the report but notably always with the conclusion that only some or little weight is to be attached to them, that mitigations have been put in place or will be secured through s.106 agreements, or, where no mitigation is possible, then, under the policy mantra of 'sustainable development' and the compelling need to build more housing to accommodate a growing population, the social and economic benefits of the development to the community outweigh the harm. Perhaps, we shall see ...

3.4 Equally, however, it would be quite possible and perfectly feasible to turn these same subjective arguments and conclusions on their head, using the same evidence and data to argue an opposite point of view that would be equally valid.

But I have not come here to do that, nor has the Town Council employed professional planning consultants to deploy arguments the intention and direction of which is to cast doubt on or contradict the case officer's report, beyond highlighting and drawing attention to the possibility that different, in some cases very different, conclusions might be reached.

3.5 If, however, from the very long list of planning considerations I drew attention to some but not all of them, they would be:

3.5.1 Highways Network Capacity – At the time the Town Council made its submission on the application earlier this year the Highways Authority had not made its formal response. The HA has now submitted its response to the satisfaction of planning officers but the Town Council does still remain concerned that the computer modelling assumptions on which the assessment of traffic impacts have been made and the highways mitigations which have been proposed, are just that – assumptions on which the reliability of the evidence for them has been questioned as a largely academic IT-based desk review exercise not well founded in fact. Concerns remain about the ability of the proposals to adequately cope with increased traffic flows at all key entry points including Spratsgate Lane/Wilkinson Road/Somerford Road to the east of the development, Tetbury Road to the west, the ring road extending through to and including the Grove Lane/Burford Road/London Road northern route into town, and the impacts on the Cherry Tree Lane/Fosseway/Harebushes Service Area A417/A429 junctions and roundabouts which already exhibit traffic queuing and gridlock at busy times.

3.5.2 Impact on the Town Centre – Restricting and effectively managing traffic movements into and through the town and its impact on the historical conservation heritage of the town, is a major concern. It is true that the recently completely Market Place regeneration scheme will play a part, though there have been many criticisms of it, including a desire to restore traffic flow to meet the needs of those whose personal convenience has been disturbed or interrupted, which run counter to the original aims and intentions of the scheme to give greater priority to pedestrians and the recreational and street trading uses to which the Market Place area can be put. In addition the narrow winding one-way system of Hammond Way and Sheep Street, already very busy and quite congested at times, will come under still more pressure, resulting in more queuing and congestion. Finally, whilst we might applaud the multi-modal shift away from using the car towards walking, cycling and public transport and the green corridors of permeability this creates, it is unlikely, given the distance of the proposed development from the town centre, that this will have much impact on residents' natural inclination to prefer personal convenience associated with continuing to use the car.

3.5.3 Parking - Already under pressure, parking is another serious impact concern for the town centre and whilst CDC's Parking Board, set up to address these concerns has come forward with limited proposals, including the construction of a decked car park at the Waterloo, these are not sufficiently advanced that any great reliance can be placed upon them. For example, there is

strong local opposition to the Waterloo, based on concerns about the height of the as yet unannounced number of decks, visibility, aesthetics, air pollution from vehicle emissions, and the ability of the London Road access from the Grove Lane roundabout to cope; secondly viable park and stride options have yet to be articulated. So I have to conclude that the identification of suitable sites, that will not become entangled in serious ownership issues and planning concerns, does and foreseeably will remain a constant ever-present concern notwithstanding the circa £500,000 s.106 contribution that has been sought to address this issue.

3.5.4 Dislocation and Connectivity of the Site - Notably, the first smaller phase of development comprising some 700 new homes will be to the east, separated by a 'bus gate' through which traffic cannot pass to or from the west of the proposed development comprising 16-1700 new homes. This is where the highways network already under strain is least able to cope and where the proposed mitigations are the least in order to generate a head of cash flow required for the whole site infrastructure improvements that are needed. This does raise a fundamental question over the adequacy of the proposals unless the previously contended modelling predictions that have been used are accepted at face value.

3.5.5 Two Applications or One - Equally, if not more importantly, the separation and phasing of the phased build-out in this way, in which all the community services – primary school, GP surgery, retail services, community hub, children's play area, adult sports and recreational areas, does raise serious questions over the dislocation of the site and whether, in consequence of location, design and phasing, two distinct communities, separated by distance and a bus gate through which traffic cannot pass, will result. I have as a town councillor first hand experience of the bus gate separating that part of New Mills (originally part of The Beeches) from the new Berkeley Homes Kingshill Meadow development by Tesco and I have to say that they are two distinctly separate communities that do not share common values, interests or activities, but merely co-exist alongside each other. Arguably, that is the recipe, if this application is approved, that we risk creating here, with the smaller phased development without additional supporting services to the east and the much larger with supporting community services to the west. This is unlikely to encourage or build social cohesion and does beg the question of whether this application is for a single coherently planned with appropriately phased development, or whether it should have been presented as two connected but different applications, much as the 88 new homes Siddington development that adjoins this site was refused but allowed on appeal that is referenced in the case officer's report accompanying this application.

3.5.6 Homes, Affordable and Social Rented Homes – I am not going to dwell on the numbers or the proposed densities of housing here beyond noting that 2350 new homes, albeit phased over 12 years, is a very great number and many would argue a disproportionate burden for Cirencester to bear especially on one site in the absence of other available sites in order to protect the AONB or the bringing forward of other potential sites, e.g. Cotswold Airport at Kemble, that may come forward in time. Suffice to say that in broad terms there does seem to be sufficient unmet and future potential demand to take up this number of homes

though inevitably it will impact on the character of Cirencester. Densities too, provided they are accompanied by good design and materials with phased housing and serviced employment land delivered according to the Golden Thread running through the Master Plan to be secured in planning conditions, should not pose a problem and will additionally create the opportunity to build the smaller affordable new homes that are needed, including perhaps one-bedroomed single-occupancy starter flats or units for which there is undoubtedly a demand (with, notably in London and elsewhere experiencing very high demands for housing, consent now being given to micro-units below normal space standard thresholds to meet this need). Others might contend that 30%, accounting for 705 of affordable/social rented homes on the 2350 new homes development, is too little in aspiring towards a figure of 40-50% but on balance provided the proportions between affordable and social rented are respected and 'affordable' is genuinely affordable, then 30% should be sufficient. In closing on this point I would add in relation to numbers, densities and building parameter heights that the green hedgerow and tree-lined buffer zone between the proposed development and the existing Chesterton development put forward by the developer and on balance accepted by planning case officers is to be welcomed given the permeability of path and cycle ways between them.

#### **4. The Planning Decision Process**

4.1 It has been strongly contended by planning case officers that the issue of prematurity, in considering and making a decision to approve the Outline Planning Application, is not hindered by the imminent Examination in Public by a Government appointed Planning Inspector of the emerging Local Plan. Guidance in the National Planning Policy Framework has been brought to bear to support this contention, particularly that in order to meet and in future guarantee the District's five year housing supply obligation, of which the Chesterton proposal is an integral part, this application must be approved with the proviso that if a material consideration arises from the public examination the application can be referred back to this committee. Secondly, as a backstop, if this committee approves the application, the determination will have to be referred by the Planning Authority to the Secretary of State for his approval before the decision notice can be issued, in response to which the Secretary of State has a statutory period of 21 days which may be extended for a fixed time period or indefinitely whilst he makes his determination whether to "Call-in" the application for his own determination during which time a 'holding direction' restricts the granting of planning permission.

4.2 In response to this I would point to the fact that the District has met and indeed currently exceeds its 5-year housing supply figure at 7.54 years as of May 2016 as confirmed by the Planning Inspector allowing the developer's appeal against refusal by the Planning Authority of the 88 new homes development at Siddington. Moreover, this figure includes a 5% buffer and the District also benefits from not having a history of under-delivery of housing (paragraph 8.13 of the case officer's report refers). So, in summary, there is no compelling reason to determine and approve the outline planning application today given the very close proximity in dates of the Examination in Public of the emerging Local Plan

where the inclusion of Chesterton as the District's sole strategic site in delivering the majority of the District's outstanding housing needs will be closely scrutinised.

4.3 Secondly, in exploring the planning issues associated with this application in my submission, I hope I have illustrated and shed light upon the many concerns that continue to occupy the thinking and anxieties of the many residents of Cirencester who are represented by the Town Council, including the fact that the development proposed is so substantial, and its cumulative effect so significant, that to grant permission risks undermining the plan-making process by predetermining decisions about the scale, location and phasing of the new development that are central to the emerging Local Plan.

4.4 These issues are not to be lightly disregarded and time is not so short, given the 5-year housing supply figures have been exceeded, that members of this Special Council meeting cannot await the outcome of the initial findings of the Examination in Public before proceeding to determine this application. Indeed, many independent observers would conclude that it would be premature and potentially unsafe to do so, in an action that some might interpret as an attempt to predetermine, bind and fetter the Planning Inspector's independent examination of the emerging Local Plan.

## **5. Conclusions**

5.1 It would seem wise therefore for this committee to defer its consideration of the outline planning application until the preliminary findings of the Examination in Public are known. This would seem to be the wisest and safest course to adopt noting that, within the short timeframe of the deferral that is proposed, the developer is unlikely to appeal against non-determination of the application since to do so would inevitably result in further delay.

5.2 Moreover, in terms of material considerations, the committee in determining this application may benefit from the Planning Inspector's initial findings to better inform, from an independent external observer's perspective, their final decision to approve or refuse the application.

5.3 In summary therefore it is clear that the application has strained to mitigate the downside effects of its less than optimum location (balanced against the protection of other potential sites) and the physical constraints of that location: constraints that were not fully understood at the time of its selection as the sole strategic site for the district as a whole and which have only become apparent during the detailed preparation of the planning application. The fact that a suitable and sufficient supply of fresh water to the development site, which is not resolvable and cannot be guaranteed and which is to be made the condition of an impact study to determine the magnitude of the additional capacity required and a suitable connection point (Case Officer's Report para 19.17, appendix 39 para 16), serves to emphasise and underscore this point.

## **6. Recommendation**

**6.1 I therefore strongly urge this committee to defer its consideration of this outline planning application** until the initial findings of the Examination in Public are known. In consideration of the application being deferred the **Town Council reserves its position on Section 106.**

**Cllr Stuart Tarr  
Chairman of the Planning Committee  
Cirencester Town Council  
26<sup>th</sup> September 2017**

Re 16/00054/OUT Chesterton

I was a member here at CDC for 12 years until 20-15, 12 years on the planning committee, 10 as Conservative whip, with considerable experience of planning matters, and the planning process.

During that time groups of Councillors met to consider where additional houses should be located. The Consensus was that housing should spread around, some in Villages, not concentrate it all in the major settlements and certainly not to locate it all south of Cirencester.

This begs the question "Why did Forward Planning ignore this and seek to put so much of the burden on Chesterton?" Yes we need additional housing but this is clearly the wrong place to put all the 2300 new homes.

You have heard how Deer Park roundabout is almost gridlocked at peak times now, yet the access arrangements will substantially increase traffic on this route.

You will remember the improvements to Cherry Tree Crossroads promised for the Kingshill development,? Well we are still waiting.

Today is your only chance to influence the Access Arrangements. They are not reserved matters. Approval today will mean no further improvement will be contemplated.

Even today's officer recommendation admits "The proposed []development would be outside Cirencester town centre and would not be in accordance with adopted Local Plan policy."

This cannot be a political decision. Whipping is not allowed on Planning Matters. It must be a free vote.

It may be a good idea to call for a Recorded Vote. A record of who voted for and against the proposal. Then there will be no hiding place come election time and individual reputations will be at stake.

I know you have been subjected to tremendous pressure by officers and friends of the applicant to rubber stamp this proposal.

However it is time to put the best the interests of the electorate, the people of Cirencester and the Cotswolds, before interests of officers, speculators and developers.

Please reject this proposal.

So we may all live happily ever after.

David Broad



# Objectors' Representations

TRANSCRIPTS OF OBJECTING SPEAKERS STATEMENTS MADE AT SPECIAL MEETING OF COTSWOLD DISTRICT COUNCIL AT CIRENCESTER BAPTIST HALL ON 26TH SEPTEMBER 2017 TO DETERMINE APPLICATION BY BATHURST FOR 2350 HOUSES AT LAND SOUTH OF CHESTERTON

1. Anita Smith ( resident ) Introduction
- 2 Mark Pratley ( Save Our Cirencester ) Trust
- 3 Tony Golics ( Save Our Cirencester ) Housing need
- 4 Tony Buxton ( Save Our Cirencester ) illusory benefits
- 5 Peter Dernie (Save Our Cirencester ) Traffic and Pollution
- 6 David Broad ( ex CDC Councillor ) Councillors ignored ?
- 7 Patrick Moylan ( Save our Cirencester ) Summing up

## 1. Anita Smith Introduction

Various petitions and surveys over the last 2 years show that the residents of Cirencester welcome appropriate development to meet the growing needs of the town. However, these same surveys show residents are overwhelmingly opposed to the scale and the location of the proposed development.

The Council states in the Officer's Report that this application will cause harm to the town of Cirencester. It concludes that this harm will be balanced out by the benefits. We argue that the benefits to Cirencester's residents are grossly overstated. Beyond the sport and play areas (which we arguably already have), there are very few additional guaranteed benefits. The housing need is overstated, as we will explain shortly. Traffic related air pollution is not assessed in any detail, ignoring the most recent research and ignoring a duty of care that Councillors have in determining this application.

National Planning Policy Framework requires the planning system to contribute towards sustainable development. The reality is, that residents living on the proposed site would be far too reliant on car travel to reach the town centre and other destinations in the area. The size and the location of the development will generate significant increases in traffic, which Cirencester simply cannot absorb without completely reconfiguring the road network. The proposed development is unsustainable.

The Applicant and the Council claim that the site is connected to the town centre by cycle routes and foot paths. This is just paying lip service to the whole concept of sustainability; The Applicant and the Council claim that the site is connected to the to the whole concept of sustainability; the truth is, people will not use these as regular means of travel as they are too onerous and time-consuming; it would take an hour to do a round trip to town and back. There are also claims that a bus service will connect the site to the town, when we all know that significant improvement to the existing bus service is needed, and that it struggles to get through town as it is, without additional traffic.

In conclusion, the development will generate significant increases in traffic that are simply not sustainable over the long term.

## 2. Mark Pratley Lack of trust in the Council

It is with regret I have to say, that there is a high level of distrust towards the Council, something which should be a significant matter of concern to all. This has grown in recent years. The Council did not follow best practice in its consultation with Cirencester, further increasing this distrust.

Consistent with good practice, the applicant (BDL) arranged a visit of Cirencester residents to a comparable 3,000 home development on the edge of Aylesbury. Two main lessons came out of this visit:-

Firstly, with 1,500 homes completed the development had a new link road to ease traffic congestion, a new river crossing, a student academy from nursery to 6th form completed, and a train station with direct links to London immediately adjacent to the development. All could see that this represented a sustainable site. These are not being provided by the applicant, in the Chesterton development.

Secondly, Construction stopped at 1500 homes, leaving the site in a poor condition resembling a wasteland. The Council had no powers to require the developer to complete or restore the unfinished areas of the site.

It would be prudent to require the applicant (BDL) to be the subject of strong legally binding obligations secured by a financial bond, one of the few ways in which the Council can be certain the development is delivered as promised. Thus ensuring, that the experience of the Aylesbury site, is not repeated in Cirencester.

It is clear from the Officer's Report that the Council has no intention of seeking this protection for Cirencester, why when other Councils would routinely do so? This risks leaving Cirencester with an uncompleted wasteland and an unacceptable burden while the applicant can just walk away, having secured a profit.

SOC Research has demonstrated that this Council is prepared to burden Cirencester with a new build equal to two and a half times the national average for other similar sized town in the UK. This equates to 17 new houses per 100 residents, instead of the national average of 7 new houses per 100 residents.

A further example of the lengths this Council is prepared to go, to deliver this site is its willingness to spend public money to work with an applicant who intends to avoid UK tax. The applicant may be acting legally, but morally it is wrong. The Council had a clear choice. It could have refused to work with the applicant. Most of the country including the last two Conservative Prime ministers would agree with this action. The Council however, chose to act against the spirit and arguably the letter of its own policy and accept this application knowing the applicant intended to avoid UK tax.

Traffic related air pollution is a real concern for the residents of Cirencester which based on the applicants own assessment is close to legal limits. We believe that the Council has a duty of care to resolve our concerns about air quality, rather than accept the applicant's assessment on such a serious issue.

Finally it appears that the Council has distorted the figures on house building, excluding so called windfalls from its analysis. NPPF allows windfalls to be included if, as is the case here, there is compelling evidence that such sites have consistently become available in the local area, and will continue to provide a reliable source of supply.

### 3. Tony Golics Housing need

During the first five years of the local plan period, existing build and new planning permissions have delivered 5,752 homes out of the 8,400 identified as being required for the District. To explain this in a different way, that equates to meeting almost 70% of the identified need in less than a quarter of the time. If that same rate of build and new permissions continues the identified need would be satisfied by end 2018, and deliver almost 23,000 homes by the end of the plan period in 2031. In fact, the build rate could fall as low as one fifth of the current rate and the identified need would still be provided.

This is based on the figures provided by the Council to the local plan examination.

So it is quite wrong for the Council and applicant to say that the site is critical to meet the housing need. It is not.

The progress demonstrated during the first five years allows the Council to defer this application for at least five and then to re-start it, or identify alternative site. The risk of missing the identified housing need is very low indeed.

The Officer's Report says that a failure to deliver the site would "require a significant number of alternative sites" in "less appropriate and more sensitive locations". No evidence is provided to support this statement.

The assessment of the Councils own figures demonstrates that there is no strong argument to support continuing with a controversial site when by the Councils own assessment it will harm Cirencester. To prevent this burden, and negative impact on Cirencester, Councillors should refuse, or as a minimum, defer this application for several years.

### 4. Tony Buxton Benefits are uncertain and do not outweigh harm

The applicant and Council make much of the benefits of the proposal. The Officer's Report concludes that the wider public benefits brought by the site will outweigh any harm. So, as you know, the benefits should be real and they should be delivered with a high degree of certainty

Housing need has already been discussed. The applicant has described the other benefits as

Direct and indirect jobs during construction. Major developments such as this one are delivered by national construction companies with established access to labour and supply chains designed to minimise construction cost. Labour will for the most part be imported and supply chains will be mostly outside of the area. It's how builders remain competitive. The Officer's Report considers construction is temporary so surely these jobs are also considered temporary. Because there is little certainty of local jobs this benefit should be given little weight.

Long term employment opportunities are welcomed and the applicant was questioned on these at a recent town meeting. The response was disappointing and the applicant was unable to explain in any detail and with confidence how these opportunities would be provided. The long term opportunities were more of an aspiration than anything firm or certain. Until the applicant provides greater certainty this employment should be given little weight.

Health - the applicant says that there will be on-site provision of health services to meet the needs of the development including a GP surgery and pharmacy.

The reality is the applicant will provide the land only. The Gloucester Care Commission Group advises that it would not support the GP surgery envisaged because it is not viable. No weight can be given to this benefit.

Sports and play areas - the original proposal included extensive sports and recreation facilities. In the application this is much reduced and includes a capital contribution to off-site leisure centre and off-site pitches. Land would be set aside for a sports hall, pitches and fitness suite on-site.

This is a benefit for the development. As the site is severed from the market town it cannot be a significant benefit to Cirencester.

The applicant is providing open spaces, much of which is necessary to cover areas of high pressure gas pipes and other infrastructure. As the site is completely severed from Cirencester it is of little benefit to the market town.

Highway improvements - The Officer's Report explains that the development will more than double traffic journey times from a starting time of approximately 1,300 seconds to approximately 2,800 seconds. The mitigation will return journey times to approximately 1,300 seconds. Therefore it is nonsense to describe these highway works as a benefit when all they do is seek to maintain a journey time which is worse than we have now. These modifications should be given no weight.

Schools - this topic was raised with the applicant at the town meeting. We understand that Primary schools in the area are already at capacity and children are being bussed out of the area. The applicant responded that it was prepared to provide temporary construction cabin style accommodation for primary school children until the development was advanced or completed. As there is no certainty the school will be delivered these benefit should be given little weight.

Without being certain benefits can be delivered and no substantive benefit to the market town Councillors should give little or no weight to these benefits and refuse the application

## 5. Peter Dernie Traffic and Pollution

In January 2017, Save our Cirencester had a meeting with GCC Highways Development Management, where they stated that -

they believed the Bathurst Development Ltd proposed mitigation for Chesterton and especially the Tetbury Rd. roundabout was considered sufficient to prevent severe congestion.

The implication was that if traffic increased beyond their current predictions severe congestion would result. That view was based on the trip rates which were provided at that time by Gloucester County Council Highways Department. Subsequently, Save our Cirencester believes, based on credible technical and statistical analysis, the trip rate used for Chesterton is a significant underestimation.

The defensible conclusion is that there probably will be severe congestion on both the major arterial roads of Cirencester and also the minor town centre roads as traffic attempts to avoid that severe gridlock.

BDL has attempted to rescue the situation by proposing numerous traffic light controlled

pedestrian crossings and traffic flow traffic lights on roundabouts along the A419 and the A429 roads. However, the most logical and common-sense conclusion is that multiple traffic lights will increase severe congestion even further on Cirencester roads.

We believe, after Chesterton, you should all prepare for long polluted delays on your way to school or work. Councillors, please do not approve this development at this time until there has been further independent detailed analysis of traffic volumes.

#### Air Pollution

In February 2016 the Royal College of Physicians released a report stating outdoor air pollution contributes to about 40,000 early deaths a year in the UK. That's about 100 full jumbo jets a year crashing in the UK and killing everyone, about twice a week. After how long would there be an outcry that something had to be done?

So how does the council contribute to the reduction in deaths due to outdoor air pollution: it wishes to approve over development which, by Bathurst Development's own admission, will generate air pollution very close to illegal levels. By Save our Cirencester's reckoning it is very likely to be into illegal levels (remember the trip rates discussion earlier). Does this show the Council is exercising its duty of care to Cirencester residents for decades to come? Arup, one of the council's expert independent advisors, reviewed one of the developers flagship documents, the Environmental Statement, in early 2016. It found approximately 30 totally flawed issues in the ES, including air quality, and declared it unfit for purpose. One of their recommendations was -

The changes in traffic due to the large development are not considered as being adequately assessed. A detailed assessment approach using detailed dispersion modelling should be followed for an assessment of this scale.

A detailed assessment is, as it sounds, a more thorough and detailed analysis of traffic and likely air pollution which will give a more accurate and reliable result. Was this advice followed by the council? No, it wasn't.

Bathurst Development Limited did update the Environmental Statement, but Arup were not allowed to consistently re- review the full updated Environmental Statement to confirm it was fit for purpose. I guess the Council obviously thought there would be more bad news if it did. The Environmental Statement therefore remains unfit for purpose and should not be used in the decision making process.

Save our Cirencester has communicated numerous times to one of the Council's guardians of public health, the Technical Pollution Group, arguing, that a detailed air pollution assessment should be carried out to fully understand the serious pollution risks. They always refused, quoting regulations and procedural requirements.

The Bathurst Development air pollution modelling is particularly unfit for purpose. The developer and council were requested to correct 5 flaws within the detailed air pollution study, and eventually they did address one issue. The correction of this one issue significantly increased the predicted NO<sub>2</sub> air pollution concentrations by 7.7% to up to 94% of illegal levels.

Did this encourage the Council to review the other issues; no, it didn't. They preferred to kick

this serious unresolved problem on to this meeting in the hope that councillors would approve the development. Councillors please do not approve this development today in its current form until, amongst other things, a detailed air quality study is carried out to confirm the health of Cirencester residents will not be compromised.

### Safety

Safety and health are apex issues in the workplace. Everything stops unless the workplace is safe. Bathurst Development Limited has proposed, and the Council has not rejected, the commissioning of Toucan crossings where subways currently exist (and where they don't). Save our Cirencester is unaware of anyone being run over in a subway. However, accidents do happen at pedestrian crossings; approximately 20% of all pedestrian accidents. Previous Cotswold District Councils realised this and built subways and bridges.

The Bathurst Development Limited proposal of de-commissioning subways and replacing them with Toucan crossings will result in accidents. We are talking real flesh and blood, not regulatory concepts.

The council needs to think 'safety', not regulations. The current proposal will result in additional accidents and injury. Councillors, this is another reason why this development must not be approved today in its current form.

### 6. David Broad Councillors views ignored

I was a member here at CDC for 12 years until 20-15, 12 years on the planning committee, 10 as Conservative whip, with considerable experience of planning matters, and the planning process.

During that time groups of Councillors met to consider where additional houses should be located.

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It may be a good idea to call for a Recorded Vote. A record of who voted for and against the proposal. Then there will be no hiding place come election time and individual reputations will be at stake.

I know you have been subjected to tremendous pressure by officers and friends of the applicant to rubber stamp this proposal.

However it is time to put the best the interests of the electorate, the people of Cirencester and the Cotswolds, before interests of officers, speculators and developers.

Please reject this proposal.

## 7. Patrick Moylan Summing up

It is now clear that the really important decision to build all these houses on this single site was made years ago behind closed doors mainly by a few key people in CDC's Forward Planning Team without any proper consultation with the people and maybe not even with councilors. So called consultation by CDC has been woeful. They may have ticked all the boxes but they have never reached out to the people affected by the local plan and the Bathurst application.

So here we are now at one minute to midnight. Is it too late for the public to reach out to you - the 34 independently minded councilors who have to make this very important decision? The applicants have produced their glossy brochures, They have paid the consultants and experts for their expensive advice, the various departments like Highways have rubber stamped the traffic report so that the planning department can produce their report. Everybody has had their say - except you. And now you get to have your say and make your decision and for that we are grateful. We are grateful that it is your decision and yours alone. You can take an holistic view, a more detached view, a wordly view, a human view, a realistic view.

Amongst the many, many reasons why this application should be refused there are a few that stand out.

Please never underestimate the love that people have for this town and how fearful and frightened they are for its future if this development goes ahead. Please remember that to them the future of Cirencester depends on this development not going ahead.

But it's more than raw emotion that compels people to object to this proposal

The picture emerging is that the targets are being reached without the strategic site.

Because of smaller scale developments around the district while the local plan was delayed and delayed we don't need this huge development and quite why you're being asked to approve 2350 houses right now is hard to understand.

It is right that Cirencester should have more houses but to be getting nearly two and a half times more than other towns of its size seems not only unfair but downright wrong.

And lets be realistic the new development will not be part of the town community because its in the wrong place, cut off by the relief road and too far away from the town. People will not walk or cycle. A round trip would take one hour of peoples precious time and they'll use their cars - adding to our already congested streets. The so called mitigation measures, traffic lights and toucan crossings and so on will just snarl up a relief road which is very good at what it was designed for - to get traffic around and away from the town.

Many of the new residents will not be working in Cirencester but will travel miles to the major centres as far away as Reading and Bristol. We're looking at an isolated dormitory community. Not a sustainable community

Yes - this town should take a share of the district's housing need but this application takes us way beyond that. A combination of greed and convenience are behind this application. It is quite simply too big and approving it would be a big mistake. Please refuse it.

(END)