

Appendix 1 : Objection from Save Our Cirencester

(Please note that this report has been re-formatted by Officers for ease of reference but the wording has not been altered or re-ordered.)

Objector – Save our Cirencester

Reasons for objection

- Design
- Highway access and parking
- Impact on Conservation Area
- Impact on Listed Building
- Loss of general amenity
- Other
- Over development
- Trees and landscaping

Review of the Officer's Report and Message to CDC Councillors

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1. Introduction

1.1. The Officer's Report (OR) from the Cotswold District Council (CDC) Senior Planning Officer (Development Management) on the Chesterton development has now been issued.

1.2. We find the Officer's report flawed and biased. Valid critical concerns and risks in the approach and conclusions of Bathurst Development Ltd (BDL) reports and studies have been mentioned, but have not been given any importance; they have effectively been dismissed.

1.3. The objective of this document is to ensure CDC councillors are aware of the flawed BDL and CDC data analysis and conclusions. This review focuses on Environment, Safety and Pollution along with some additional important issues. We believe you need to be aware of multiple legal, procedural and practical shortcomings of this application before you cast your vote.

1.4. We assume all CDC councillors who live and represent Cotswold towns and villages, many of which have already experienced development, vehemently oppose further town degrading development. We have seen and heard this emotionally and forcefully presented at CDC planning meetings by a number of CDC councillors.

1.5. We believe you understand the significant risk of degradation to Cirencester. We ask that you do not impose on Cirencester what you vehemently oppose for your own towns and villages. Please do not kick your own town's solution into Cirencester's back yard. We believe there is a solution which is beneficial to all, but it is not the Chesterton proposal in its current form and scale.

1.6. BDL have prepared, to date, many studies and analyses which they, and the OR, state are fit for purpose and support the approval of the Chesterton application; this is not a surprise. However, it can be shown the data and evidence points to a conclusion which is that this development application should not be approved on the 26th of September. We believe you should delay any approval of this proposed development until the many flaws and mistakes in the many reports are correctly investigated.

2. Listing of Flawed Analyses and Statements on Environment, Safety, Pollution and Other Important Issues

2.1. Environmental Statement

2.1.1. The Bathurst Development Ltd. Environmental Statement (ES) was released for public review in January, 2016.

2.1.2. Following its release, the ES was reviewed by Arup, a respected independent firm of designers, planners, engineers, consultants and technical specialist. They used an evidence based approach using the 'Traffic Light' evaluation technique to produce an excellent, unambiguous report. They discovered in the ES approximately 30 red issues where Red = deficiencies which are likely to be significant, potentially resulting in a risk to the decision-making process.

2.1.3. Arup's conclusion regarding the ES was - "Overall it is considered that there is significant risk in CDC using the environmental information provided to determine the current planning application and further clarification should be sought from Bathurst Development Ltd." - In other words, the ES was unfit for purpose.

2.1.4. Following the Arup request, BDL issued an updated ES in October/November 2016. Best practice required that Arup also reviewed the updated ES to confirm the c. 30 red comments had been addressed. However, CDC did not wish to do this.

2.1.5. Save our Cirencester (SoC) continued to lobby for an Arup review and eventually CDC agreed that Arup should review the Air Quality chapter only (see below on this audit).

2.1.6. In the absence of a second, formal, consistent, thorough and independent evaluation by Arup of the complete updated ES (and not just Air Quality), it remains, by default, an unfit for purpose document which should not be used in the decision-making process.

2.1.7. Within the OR it is stated –

3.6 It is explained within the ES that best practice has been followed for each subject chapter where it is available and in the absence of best practice, a structured approach has been followed.

2.1.8. The following Arup comments contradict this statement and confirm 'best practice' was not followed, even where available - There were c. 30 'red' issues. With so many examples of lack of adherence to best practice how can this report be considered 'best practice'?

2.1.9. The Officer also states within the OR –

3.8 Officers engaged a multi-disciplinary consultancy (Arup) to undertake an independent review of the ES. The purpose of the review was to ensure that the ES was prepared in accordance with the relevant EIA regulations; that it was completed to a standard to enable the Council to make a fully informed decision on the OPA;

2.1.10. As stated above, Arup's conclusion was –

"Overall it is considered that there is significant risk in CDC using the environmental information provided to determine the current planning application and further clarification should be sought from Bathurst Development Ltd."

2.1.11. Conclusion: No authority should approve any major development without the ES (which is prepared by the developer) being formally audited and formally approved. The ES is an important and critical document and should be given respect. The Officer should not make any Chesterton recommendations until the current ES is formally re-audited and approved by Arup.

2.2. Air Quality Modelling Process

2.2.1. Air quality modelling uses complex software and processes. Unless the inputs and the processes are technically robust the output will be unfit for purpose. This is a process which requires considerable skill and experience to be completed accurately.

2.2.2. An expert in this type of modelling (Mr. P. J. Dernie) has reviewed the modelling carried out by BDL. Mr. Dernie has a Joint Honours degree in Physics and Geology from Manchester University and a MSc. In Applied Geophysics from Birmingham University. He first started modelling data in 1982 when he started work in the BP Research Centre in London. He has over 30 years of modelling experience with world class companies and has held high level technical and technical management positions worldwide. His opinion is that the air quality modelling process carried out by BDL is technically flawed and unfit for purpose.

2.2.3. As stated above, at the end of 2016 following pressure from SoC, Arup were finally requested by CDC to carry out a second review of the BDL updated Air Quality section. However, for this second review, CDC changed the Terms of Reference and removed the transparent, evidence based 'Traffic Light' evaluation system (see below). In such circumstances, it was not possible for Arup to confirm whether the c. 30 red issues had been addressed or not.

2.2.4. Arup stated, regarding their second review (Technical Note: Review of Mr. P. Dernie letters and Save our Cirencester Correspondence, 20 February, 2017) –

"Present modelling vs future modelling - model verification has been used to ensure modelling of the existing scenario is correct prior to applying an adjustment factor where necessary to the future modelling scenarios. This exercise has been undertaken incorrectly by the applicant, however, if it had been applied correctly it is not considered that the overall conclusion of the assessment would have been changed."

2.2.5. In other words, the modelling was undertaken incorrectly. However, there was no desire by CDC to correct this mistake. CDC were content with the subjective opinion of Arup that did not believe there would be an air pollution issue. We believe the air quality modelling must be carried out correctly. It is not scientifically reasonable to make subjective judgements based on an incorrect and flawed analysis. In this instance, we do not agree with Arup's conclusion.

2.2.6. Mr. Dornie advised CDC of numerous areas where the BDL NO₂ air quality modelling was technically unfit for purpose. These were -

2.2.6.1. Very limited pollution variables inputted to the modelling process resulting in erroneous and totally understated modelled air pollution values,

2.2.6.2. No data conditioning of the model verification datasets (to remove spurious values) which created significant systematic error,

2.2.6.3. Unacceptable transposition of a model verification value from its data collection location to a different location where the characteristics were different, resulting in a flawed value,

2.2.6.4. The use of just one (flawed) verification location to correct a complex and varying air pollution surface is technically inadmissible based on sampling theory,

2.2.6.5. The lack of any risk analysis to determine a worst-case scenario which is a requirement in highly uncertain situations. This was requested by Arup but not carried out by BDL and CDC.

2.2.7. At a late stage BDL accepted issue (2.2.6.2.) was valid resulting in the post Chesterton air pollution predictions being increased by a significant 7.7%. All other issues were not considered.

2.2.8. Conclusion: Air quality modelling is critical as it is the confirmation that Cirencester residents will not be, unwittingly, subject to illegal pollution levels. We know the BDL air pollution modelling is flawed. We believe the change in Terms of Reference and the removal of transparency for the second Arup Air Quality audit was for a reason. Arup definitively confirm the modelling process was incorrect. If it is incorrect it needs to be re-evaluated. Valid technical analysis must not be substituted with subjective opinion based on flawed datasets for such important analyses.

2.3. BDL Air Quality Predictions Following the Proposed Chesterton Development

2.3.1. Notwithstanding the above, BDL's own predictions confirm the high risk of illegal air quality events occurring in Cirencester.

2.3.2. Following BDL's blanket increase in predicted NO₂ air pollution levels of 7.7% in July 2017, locally NO₂ pollution levels were predicted to be close to illegal European Union levels.

2.3.3. In the latest air pollution predictions, (NEW DETAILS - AIR QUALITY UPDATE, 16 August, 16/00054/OUT), BDL again increased predicted NO2 pollution levels (including mitigation) after the proposed Chesterton development –

- o Tetbury Rd. 94%
- o A 429 (Hammond/Midland) 91%
- o Burford Rd. 91% of illegal levels (Officer comment - bullet point text not clear in submission)

2.3.4. These figures do not include the effect of up to 9 Toucan and traffic light controlled crossings on the A429. It is acknowledged traffic lights, of whatever type, dramatically increase air pollution. SoC estimates, using simple uncertainty analysis, there is at least a 35-40% risk of air pollution concentrations being above legal limits after any Chesterton development

2.3.5. According to 'Guidance on Transport Assessment, Department for Transport, March 2007' - 4.40 If a development is likely to generate significant vehicle trips on the local highway network or SRN, which in turn would be likely to cause a breach of statutory limits, the relevant authority could be held legally responsible if a breach were to occur. In these circumstances, the developer may be required to propose mitigation measures that will avoid such a breach. If a breach remains likely, this could be a material consideration in the assessment of the planning application and may result in the refusal of planning permission.

2.3.6. BDL's own figures, combined with uncertainty analysis, confirms an illegal event is a high risk. This would be the basis for the rejection of the application. CDC must not approve a potentially illegal proposal.

2.3.7. Conclusion: Based on a totally flawed air quality analysis process and the future air pollution uncertainties, there is a significant risk of an illegal air pollution event occurring in Cirencester after the Chesterton development. A potentially illegal proposal should not be approved, it must be modelled using best practices and analysed in a technical valid manner. This is carried out in a detailed air quality study.

2.4. Requirement for a Chesterton Detailed Air Quality Study

2.4.1. It is generally agreed illegal air pollution levels may cause premature death if exposure is for significant periods. For a proposed development of this size with 1. predicted air pollution levels close to illegal levels, 2. significant pollution sources excluded from the modelling and 3. great uncertainty on the future level of air pollution, a detailed air pollution study must be carried out. The health and safety of Cirencester residents must be the No. 1 priority and we must not take risks with it.

2.4.2. Arup, CDC's expert auditors of the ES, in their initial July 2016 ES Air Quality review stated –

"Chapter 13 (Air quality) includes the assessment scope, however the EPUK/IAQM screening criteria would result in the need for a detailed assessment, rather than a screening DMRB approach which has been undertaken."

2.4.3. This was not accepted by BDL or CDC.

2.4.4. The Design Manual for Roads and Bridges (DMRB) regulations state, regarding a detailed Air Quality assessment –

3.32 Assessment Level - Detailed

A detailed assessment should be applied where there exists the potential to cause significant effects on environmental resources and receptors.

and

3.33 Local Air Quality

If the assessment so far has indicated that there is a reasonable risk of EU limit values or Air Quality Strategy objectives being exceeded at relevant locations or the project includes significant features that cannot be assessed at the simple level, then a detailed level assessment should be carried out by someone with relevant expertise.

2.4.5. Note the DMRB uses the word risk. Risk is the possibility of an negative event occurring based on uncertainty. Uncertainty analysis should be carried out.

2.4.6. The above July 2016 Arup recommendation for a detailed air quality study was not repeated in their second review published early 2017. Why?

2.4.7. The Technical Pollution Services group at CDC have refused to recommend a detailed study. This disrespect for the health of Cirencester residents is unfortunate, especially given the rise of serious concerns regarding the lethal effects of air pollution, especially in the young and senior citizens.

2.4.8. They also state - -

'A detailed assessment approach using detailed dispersion modelling should be followed for an assessment of this scale.'

2.4.9. The Officer states within the OR –

12.5 The NPPG advises in paragraph: 005 (Reference ID: 32-005-20140306) that "Whether or not air quality is relevant to a planning decision will depend on the proposed development and its location. Concerns could arise if the development is likely to generate air quality impact in an area where air quality is known to be poor. They could also arise where the development is likely to adversely impact upon the implementation of air quality strategies and action plans and/or, in particular, lead to a breach of EU legislation (including that applicable to wildlife)".

12.8 Local Plan Policy 5 (Pollution and Safety Hazards) states that permission will not be given for a development that would result in unacceptable levels of pollution to the public or the environment. Conditions or obligations will be sought where appropriate to minimise levels of pollution.

2.4.10. The post Chesterton predicted Air Quality NO₂ concentrations, provided by BDL are locally up to 94 % of illegal values. Add in omitted pollution sources (Toucan and traffic light controlled crossings) plus the considerable uncertainty in future pollution levels, then there is definitely a high risk of illegal levels of pollution. A detailed air quality study must be carried out.

2.4.11. Incorrect use of the term 'Worst Case Scenario'

2.4.11.1. In August 2017 BDL placed on the CDC public access portal an update where they began to use the term 'worst case scenario'. The supposed worst case scenario described by BDL was in fact the 7.7 % increase in predicted air quality NO₂ concentrations due to the correction of the originally flawed model verification value. This was the correction of a systematic evaluation error and in no

way a worst-case scenario. A worst-case scenario is calculated by applying uncertainty analysis.

2.4.11.2. CDC were advised of this misuse of the term 'worst case' by email and through the public access portal. SoC are very concerned this mistaken use of this statistical term may create a perception that an illegal air pollution event could not happen.

2.4.11.3. Arup were aware that a true 'worst case' scenario needs to be determined

2.4.11.4. The full SoC/P. Dernie submission is as follows –

Application Number: 16/00054/OUT 22nd August, 2017

Comment:

There has been a sudden widespread appearance of the term 'worst case scenario' in relation to the early July Bathurst Development Ltd. air pollution update in the correction factor for model verification (from 2.6 to 2.8) for NO₂ concentrations.

For the avoidance of doubt, it needs to be confirmed this update is not connected to or related to the statistical determination of a worst case scenario.

The July increase in the predicted pollution levels is directly attributed to the correction of a basic error in the determination of the correction factor and is therefore the rectification of a systematic error. It is part of the large error associated with the flawed BDL analysis process to determine the pollution concentrations.

For a future prediction of air pollution concentrations, external factors unrelated to the current process of modelling, may have a significant effect on the actual true value. This is called uncertainty and is different to error.

The chances/risks of these uncertain events occurring, and their relative importance, need to be determined by experts in statistics and air pollution prediction to give an overall post development air pollution probability function from which best, mean and worst cases are determined. This is often called Percentile 10 (worst case), P_{mean} (most valid case) and P₉₀ (best case) [for an exceedance probability function].

Thus, the statement that a correction factor of 2.8 is a 'worst case scenario' is incorrect and should be disregarded. It must not be used as a reason for dismissing uncertainty or the high risk of illegal NO₂ concentrations.

2.4.11.5. Despite this very clear advice this term was used many times in the OR.

2.4.11.6. SoC wishes to advise all councillors that no worst-case scenario has been determined. Arup recommended that best practice requires a worst-case pollution determination using uncertainty analysis. CDC did not act on this advice. A 'worst case scenario' analysis may however be incorporated into any future detailed air quality analysis.

2.4.11.7. Conclusion: To safeguard the health of Cirencester residents, a detailed air quality study, including uncertainty analysis, needs to be completed before any decision is made on the Chesterton development. This has been rejected numerous times by CDC's Technical Pollution Group. Why?

2.5. Increase in Safety Risk at Toucan and Traffic Light Controlled Crossings-CDC Duty of Care

2.5.1. Safety and health is the top priority for all companies and institutions.

2.5.2. BDL has proposed and CDC has not rejected the commissioning of Toucan and traffic light controlled crossings where subways currently exist (and where they don't).

2.5.3. Accidents do happen at pedestrian crossings; approximately 20% of all pedestrian accidents.

2.5.4. Previous Cotswold District Councils realised this and built subways and bridges. Much of this construction was probably before NO2 and particulate matter air pollution was a major issue. It was probably purely safety which guided their decisions.

2.5.5. The BDL proposal of de-commissioning subways and replacing them with Toucan and traffic light controlled crossings will result in a pedestrian safety risk increase from virtually zero to a measurable risk. Statistically, over the long period of use of the proposed Toucan and traffic light controlled crossings there will be a high risk of accidents and injuries. We are talking real flesh and blood, not regulatory concepts.

2.5.6. The Officer states in the OR –

11.65 A419/A429 Ring Road/Midland Road/Watermoor Way junction (Fire Station roundabout) including Midland Road (Drawing Nos ITB6173-GA-044) [Appendix 23]: It is proposed to widen all approaches except Bristol Road east and signalise all approaches except Watermoor Way. A pedestrian crossing is proposed across the Bristol Road west and a Toucan Crossing is proposed across Bristol Road east. This will allow the pedestrian subway to be closed. Subways are no longer seen as desirable and current best practice is to avoid providing them as there are personal safety issues and difficulties for disabled users with subways.

2.5.7. What are the issues? SoC is unaware of pedestrians, including disabled users, being hit by vehicles whilst using a subway. We are aware that pedestrians may get their feet wet twice a year following heavy rain. Make your own judgement - would you prefer a life affecting injury or wet socks. We must start applying common sense and not these flawed 'best practice' regulations.

2.5.8. The commissioning of 9 Toucan crossings and traffic light controlled crossings along the A429 Bristol Rd. will frustrate everyone as they lurch from one red light to another and sit and wait as pedestrians cross the road. What will this create? It will create a desire to accelerate into the lights as drivers perceive an imminent change to red (dangerous!) and a desire to take shortcuts through Cirencester to avoid the frustrating wait. Cirencester centre congestion will result.

2.5.9. Conclusion: CDC needs to think 'safety', not regulations. BDL's numerous Toucan and traffic light controlled crossing proposal will create a high risk of additional accidents, injury and town centre gridlock. Why does the OR not criticise this proposal?

2.6. Trip rates and Alexander Drive/Maples

2.6.1. Trip rates are the number of journeys by car per household, or per person, per day. In order to determine the number of car journeys per household/person per day from the proposed new Chesterton development, one way is to measure car journeys from a similar already developed estate called an analogue or donor site. It is very important to choose a valid analogue, which does not necessarily need to be close to the proposed development. However, Gloucestershire Highways, responsible for this analysis, has used the Maples and Alexander Drive as their Cirencester analogue/donor locations. Even though these estates are close to the Chesterton development they are a very poor analogue. They have a very high proportion of retired residents, whereas the new Chesterton estate will probably have very low proportion of retired residents. Thus the trip rates as derived from Maples and Alexander Drive are too low. Despite this, there is no CDC or OR concern that the use of the Maples and Alexander drive is potentially flawed and an underestimation of trip

rates.

2.6.2. Mr Philip Williams, Lead Commissioner Community Infrastructure, Gloucestershire County Council, states in a recent email to SoC on the Trip Rate issue –

'I have also reviewed the census data for both donor sites and note that the following ratio of retired persons residing in the surveyed sites: The Maples Output Area E00112783 - 95 persons (31 retired), Alexander Drive - 132 persons (50 retired). It should also be noted that as a district the Cotswold has a similar ratio of retired to economically active persons and therefore this further demonstrates that the use of the donor site is acceptable and is comparable to those already residing in the Cotswolds area.'

2.6.3. However, Mr. Williams is factually incorrect and therefore his justification is flawed. Using his own figures, he states the percentage of retired residents in Alexander Drive and the Maples sites is between 33 and 38%. However, the percentage of retired persons in the Cotswolds AONB is 16- 17% (we assume the Cotswold AONB retired percentage does not deviate significantly from the Cotswold district retired percentage). Additionally, the percentage of retirees moving into any new Chesterton estate is likely to be well below the Cotswold Area of Outstanding Natural Beauty figure.

2.6.4. The analogue/donor sites should have been similar recent developments build within Cirencester or locally eg Swindon. Older estates built in the 1970's which now house many retired residents should never have been used. It's only common sense.
(Copied from website 07-September-2017

2.6.5. Conclusion: SoC believes the low trip rates used in the modelling makes the risk of illegal pollution and traffic gridlock higher than currently predicted by BDL. More accurate modelling using trip rates derived from valid analogues/donor sites and realistic statistics must be re-run.

2.7. Mitigation

2.7.1. SoC supports mitigation and modal shift, but that does not mean it will happen just because BDL and CDC say it will. SoC believes the proposed Chesterton development is badly located and mitigation will be limited.

2.7.2. Mitigation is required to reduce the traffic and pollution effects of the Chesterton development and to justify it as a sustainable development. It comprises modal shift and increased public transport. Without the required level of mitigation the proposed development should be rejected in its current form as unsustainable.

2.7.3. This perception of BDL optimistic modal shift predictions was confirmed by Highways England in their letter to Helen Donnelly dated 22 Dec, 2016, where it stated (Page 4) –

"Highways England believes these mode shift deductions to be optimistic for the development proposals especially when considering wider strategic journeys of the SRN which would not be influenced by walking and cycling measures set out in the Travel Plan."

2.7.4. The result of stripping out these optimistic mitigation assumptions will be to push air pollution levels even closer to the EU NO2 illegal threshold and traffic congestion will be greater than predicted.

2.7.5. Mr Philip Williams states -

5. Car Journeys generated by the proposed Chesterton Development.

a) The distance measured from the Town Centre to the edge of the development is factual and as the crow flies is approximately 1.6km and 2km is referred to in national guidance as a reasonable walking distance. It is not expected that all occupiers of the development will walk to the town centre but the site is within distance and the opportunity to do so is provided with several pedestrian/cycle links provided and improvements to 9 separate walking and cycling routes.

2.7.6. In terms of walking distance (not the straight-line distance), the distance to Cirencester from the closest point of the development is estimated to be around 2Km. Facilities out of the town centre may of course be further.

2.7.7. The Ramblers Association, using information from Department for Transport, states the average distance a person walks is c. 1KM. Above that distance (eg a distance of 2+ Km.) the percentage of walkers who are prepared to walk, will decline.

2.7.8. According to the Institute for Highways and Transportation, pedestrians are averse to steep gradients (not a surprise). There is a steep gradient for a considerable distance between the Chesterton site and the town centre. This will further reduce the percentage of willing walkers and cyclists.

2.7.9. Common sense suggests the journey times by bus to Cirencester from the proposed development are in fact too short for most people to want to put in the effort to catch a bus. This is because the combined walking to and wait at a bus stop will be close to the time taken for the bus journey. People in country areas generally use buses for longer distances. The information below shows the average UK bus journey in a non-metropolitan area is c. 5 miles, compared to c. 1.1 miles to Cirencester from the proposed Chesterton development. Most people will just get in the car to avoid the walk, the wait at the bus stop and the possibility they may have to wait for 30-60 minutes for the next bus.

2.7.10. Conclusion: Modal shift is a valid concept but to be successful the circumstances need to be right. Chesterton mitigation regarding bus travel, walking and cycling, as proposed by BDL, is very optimistic and common sense indicates most people will use their cars rather than their feet. This is further evidence that the whole traffic and air quality modelling by BDL is technically flawed and the proposed development is currently unlikely to be sustainable. This issue needs further analysis.

2.8. BDL viability assessment

2.8.1. Savills advised at the Cirencester town meeting on the 5th September that a 'viability assessment' was being prepared for the Chesterton development. With this one simple statement the risk of only very limited numbers of affordable (ie low cost) housing being built at the proposed Chesterton development increases significantly.

2.8.2. Please read the full Guardian article

<https://www.theguardian.com/cities/2015/jun/25/london-developers-viability-planning-affordable-social-housing-regeneration-oliver-wainwright> (June 2015), some of which is re-produced below.

You will then understand why reasonable numbers of low cost housing is unlikely. We all need to understand developers (and all companies) are in business to maximise profit.

Read how the 'viability assessment', prepared by the developers for a recent London re-

development, is used to significantly reduce low cost housing.

2.8.3. Conclusions: We should be sceptical about current guarantees of reasonable numbers of low cost housing in the proposed Chesterton development.

3. Systemic Failure of Local Authority Duty of Care

3.1. SoC believes there has been a systemic failure in the way this Chesterton development process and analysis has proceeded. Based on our own expertise we see flawed, biased and illogical analysis. Laws from 2007 can now hold Councils and Authorities responsible if it can be shown there has been a gross breach of a duty of care by those who exercise this responsibility. There has been serious discussion of this recently regarding the Grenfell disaster.

3.2. SoC recommends CDC councillors reject the Chesterton proposal unless they are confident that CDC has fully met its legal responsibility of a duty of care to Cirencester residents.

4. Summary and Conclusions

4.1. SoC appeals to CDC Councillors not to approve this proposal in its current flawed and ill-considered form. This is based on credible significant risks regarding the Environment, Safety, Air Pollution, and other important issues.

4.2. We see –

- Flawed technical analysis,
- Flawed expert judgement,
- Non-adherence to pertaining planning guidelines,
- Lack of effective consideration of local opinion and concerns,
- Evidence of a lack of transparency.

4.3. We request you take the approach of safety first and people before profit. Please do not currently approve this development. Vote against this proposal and give more time to progress a beneficial and sustainable development which does not severely degrade the town of Cirencester.