

Appendix 8a

Third Party Representations

This summary expands upon the summary set out within Chapter 6: Third Party Representations. **It incorporates representations included within Additional Pages at the September meeting.**

Third Party Objections

As of the morning of 26th September 2017, 576 objections from Third Parties have been received which includes representations from local and community groups. The summary of the main issues raised within the Third Party representations is as follows:

The Relationship to the Local Plan

- The proposed development is contrary to the policies of the adopted Local Plan (2001-2011);
- Determination of the application would be premature of the outcome of the on-going Local Plan process;
- The application site is not an allocated site within the adopted development plan and there is a policy presumption against development on greenfield land outside defined settlement boundaries;
- To grant planning permission would undermine the plan-making process by predetermining decisions about the scale and location of new development that goes to the heart of the spatial strategy;
- The Local Plan is very likely to be flawed and found to be not sound when inspected;
- Undemocratic for Chesterton to have been allocated.

The Scale of Development and Alternatives

- Current application should be restricted to 500 dwellings to “test the water” and dwellings should be built in villages around Cirencester to make up the shortfall;
- Other settlements can absorb a proportionate level of development;
- Before the application is determined, a settlement hierarchy should be established that directs development to the most sustainable settlements within the Cotswolds;
- Numbers should be spread amongst smaller settlements that require affordable housing;
- The Local Plan is only fair when equally shared over the whole region;
- The number of proposed dwellings would be much better forming a new village in the Cotswolds;
- Proposed development represents almost a 30% increase in the entire town’s population on one side;
- Nationally, strategic sites are in the order of 800-100 dwellings; new settlements are generally 2000+ dwellings;
- Per head of population, Cirencester is expected to accept many times the number of new homes than the English average;
- Size of development will greatly affect the dynamics of the town;

- Development of this size is totally out of proportion to the scale of the market town and will distort it irredeemably;
- Size of development will cause harm to the whole environment and will therefore impact upon the historic centre of the town;
- If development goes ahead, Cirencester will receive two and a half times the national average of over 17 dwellings per 100 existing residents compared with the national average of 7;
- Cirencester will become the most densely populated town of its size;
- Wider impact has not been fully assessed;
- Cirencester will be overwhelmed;
- Numbers have not been properly collated, we need 1000 more dwellings not 2350 due to development that has been completed or is underway;
- Have alternatives (including Kemble) been fully considered?;
- Moreton in Marsh has a railway connection and large housing schemes should go there;
- Brownfield sites should be developed instead;
- No full explanation of why Kemble is not sustainable and deliverable;
- Councillors would be failing in duties and responsibilities under CDC's constitution if they did not continue to investigate the merits of Kemble airfield.
- **There has long been a foregone conclusion that the OPA would need a disproportionate allocation of housing, irrespective of actual requirements so the "community infrastructure" would be provided;**
- **If realistic allowances were made for "windfalls" within the local plan there would be no requirement for the "community infrastructure" i.e "We need to build too many homes so we can extract developer contributions for extra facilities that are only needed because we plan to build too many houses";**
- **Local plan requirement for housing can be met without the need for the development;**
- **Council is already delivering dwellings ahead of numbers.**

The Parameter Plans/Indicative Layout

- Density would be out of keeping with the existing densities in the town;
- Densities would be at socially unacceptable levels;
- Over development;
- Development appears to be squeezed on the site in order to meet a pre-set housing need figure;
- Safety concerns regarding high pressure gas pipeline and pylons;
- Is it appropriate to place a primary school by a high pressure gas pipeline?;
- Proposed dwellings would have small gardens;
- Development will be a mini Milton-Keynes;
- Neighbourhood centre will become a dreadful den for local drug addicts and reprobates to hang out and terrorise the neighbours;
- Proposals for elderly accommodation is a thoroughly inappropriate response to the anticipated changes in the population demographic;
- Lack of single and 1.5 storey dwellings;
- Acceptance of heights at this stage would make them difficult to resist at the REM stage;
- Four storey dwellings would not be in keeping;
- Proposed dwellings would sit at a higher level than current existing residences in the section between the Cranhams and the PROW to the west;
- Public open spaces near "affordable" housing will attract all sorts of criminal activity;
- High quality community design and affordable living for local people is not high on the agenda and will not be offered;

- Proposed development would be four distinct sites;
- Eastern part of site (accessed from Spratsgate Lane) would have no facilities;
- The 573 dwellings to be accessed from Spratsgate Lane would have no improvements to the highways leading to the town centre.
- Existing trees along northern boundary do not exist and are usually single trees within existing gardens;
- Cinema should be relocated to the site;
- No need for student accommodation;
- Student accommodation should be provided within the RAU site to keep the associated traffic off the roads;

Affordable Housing

- No real provision for low cost housing;
- No land set aside for self-build;
- Requirement for affordable housing on this site will reduce affordable housing provision in smaller settlements;
- Concentrating the vast majority of affordable homes in the south of the district would deprive many who were brought up in the north of the district and would want to buy a home there;
- No requirement for 50% affordable housing;
- Proposed 50% affordable housing is a ploy to make the development seem more attractive;
- A sudden increase of 40% of the population in Cirencester will cause social problems if the proportion of affordable housing is inadequate;
- The number of affordable dwellings is excessive and unrealistic given CDC's overly restrictive rules on affordable housing eligibility;
- There should be a strong bias towards affordable housing in the villages where families can remain together.

Access and Movement

- Existing road network will not be able to cope;
- There is already severe congestion at peak times;
- Traffic has increased over past ten years due to other developments in the town;
- Site will not be self-contained;
- Inadequate bus service;
- Distance from Chesterton is too far to walk to the town centre for the elderly, mother with prams and small children etc;
- Time to walk from site to the town centre has been underestimated;
- Too far to walk with shopping, a pram, walking with a child and route from town is uphill;
- Pedestrian crossing by school will cause traffic problems and will be safety risk;
- Already congestion at Chesterton Lane;
- Families today have 1, 2 or 3 cars;
- 1990 employees will also increase traffic;
- Ripple effect of traffic from the development on small villages on all directions;
- Road network around Cirencester is rural A and B roads and not suitable for such an increase in population;
- Ring road needs to be completed on southern part of town;
- No through road means a 4 mile journey from east to west of the site;
- Through road should be incorporated with traffic lights;

- Possibility of re-opening Kemble to Cirencester branch line has been overlooked;
- A 7 day a week regular bus service for the duration of the construction period and then another 5 years would be a viable contribution to minimising traffic impact;
- Toucan crossings would be unsafe;
- Cycling would be unsafe without significant amendment to the existing provision;
- Over estimates on the amount occupants that would travel on foot or on bicycle;
- Parking restrictions should be continued along Somerford Road beyond Oaklands up to the mini roundabout;
- Junction at Spratsgate Lane will not be safe;
- Proposed pedestrian/cycle crossing at the Waitrose roundabout would not be straightforward and would add a significant distance for pedestrians;
- The development should make provision for the upgrade and on-going management of the footbridge;
- Footbridge and subway on dual carriageway by hospital should be retained;
- Footpaths are not adequate for day to day commuting;
- Kemble Station car park is inadequate;
- Impact of traffic on the Burford Road in terms of air quality, noise and safety has not been assessed.
- Highways improvements are required before building commences:
- Development provides a unique opportunity to install a light railway, cycleway and footpath to Kemble along the former railway route;
- Adequate visibility on Spratsgate Lane/proposed roundabout cannot be achieved;
- PROW 29 was constructed as a temporary diversion during construction work on The Maples and other cul de sacs then in progress. It has remained long after the need had abated;
- PROW 29 is narrow, often overgrown and frequently muddy and is not a beneficial alternative to other PROWs;
- A toucan crossing could encourage students walking to school/college to cross the road when the lights are not set to cross;
- Having lights at the A429/Chesterton junction will slow traffic at the roundabout;
- Traffic will build up in the morning just for a few drivers to turn left out of Chesterton Lane;
- Mitigation to be achieved by the proposal will be short lived;
- No realistic evidence produced for projected trip rates to and from the development
- There are more pressing traffic issues nearer to the application site than Cherry Tree junction;
- Commuters from Glos/Cheltenham would use Perrots Brook junction rather than Cherry Tree junction;
- What element of local knowledge and common sense has been factored into to traffic modelling;
- Changes to Town Centre layout needs to be factored in;
- The routing of residential traffic through Love Lane will create access problems for lorries serving Love Lane causing some companies to consider relocating away from Cirencester;
- GCC response to the application is incomplete and unfit for purpose;
- Market Place redevelopment must be taken into account in modelling work;
- Pedestrian/toucan crossings do generally improve safety where large numbers of dispersed pedestrians, trying to cross at multiple points along the length of a busy road, are guided to a controlled crossing location. However there are no dispersed pedestrians milling around on the A419 ring road trying to cross at numerous locations. They already safely cross the road at the underpasses and bridges;
- Subways could be improved and retained:

- No assurances that the construction traffic would be prohibited from using Somerford Road and Cranhams Lane;
- Reducing the speed limit would probably improve traffic flow but not necessarily reduce journey time;
- Predicted journey times do not take into account proposed traffic lights;
- No planned mitigation at the A419/A429 roundabout where the current access to Deer Park causes tailbacks and the addition of a toucan crossing will add to the problem;
- The only modification required for the Chesterton Lane/A419 junction is to allow traffic heading for Tetbury to exit in a left turn-the pedestrian crossing will cause additional delays;
- Pedestrian crossing at the hospital roundabout not required as there is a footbridge;
- Pedestrian crossing at the Fire Station roundabout not required as there is a subway;
- Footbridge already serves pedestrians at the Kingsmeadow roundabout;
- All traffic lights should be at peak times-during the rest of the time traffic should be allowed to find its own flow;
- There is scope to remove toucan crossings because safe crossing points (subways and footbridge) already existing;
- The resulting stop/start environment will create higher pollution;
- There are no significant mitigation measures for Midland Road/Bridge Road/Love Lane-traffic will still be congested about the industrial estate;
- Most other “mitigation measures” consist of dropping kerbs, tactile paving and other little uses paths will be widened or a cycle element added.

Pollution

- Increase in noise from dual carriageway to residents of Chesterton Park;
- Toucan crossing would increase air pollution for cyclists and pedestrians;
- Increased light pollution to areas in AONB which currently have little light pollution;
- Increase in air and noise pollution;
- Extra traffic pollution in the town centre has not been addressed;
- Occupants of dwellings adjacent to Tetbury, Wilkinson and Somerford Roads will be subjected to traffic noise and fumes in garden-such dwellings would be difficult to sell;
- Adjacent to roads, dwellings should be set back from roads, commercial uses should be adjacent to roads and a tall earth bund should be built to shield new dwellings from noise and pollution;
- Large number of toucan crossings will result in a significant increase in traffic generated pollution.

Employment and Economy

- The proposed commercial sites are inadequate;
- Number of jobs is dependent on type of employment proposed;
- 1,600 jobs is an over estimation;
- There is no guarantee employment land will be developed for employment uses and will become residential;
- Not enough employment in local area;
- No robust plans for increasing employment resulting in commuting;

- Application fails to follow several of the core land-use planning principles as set out within the NPPF;
- There are no jobs locally to support this volume of people;
- No provision to extend Love Lane industrial estate;
- Effect on tourism has not been considered in EIA.

Heritage

- Development does little to preserve the town's historic nature which would be swallowed up by the wave of new building;
- The heritage of the town and its unique place in history has not been taken into account;
- Unclear how the increase in traffic would have upon the listed and other buildings in Cirencester.

Landscape

- The impact of the development upon the AONB has been understated;
- No manmade park will make up for the natural beauty that will be lost;
- Loss of productive agricultural land:
- Independent assessment of agricultural land grading required;
- Impact on beautiful views of Cirencester as entering the town;
- Impact on setting of AONB;
- Encroachment into green space that surrounds Cirencester;
- Industrial area along Spratsgate Lane will be an eyesore;
- Green infrastructure should be incorporated throughout the development;
- Green areas will be completely separate from the dwellings resulting in dwellings looking like inner city areas purely of buildings;
- Amount of developable area has been reduced due to power lines, overhead cables and SAM and amount of land to be developed has been reduced:
- Green areas are lacking:
- Sports facilities and playing fields are inadequate for a development of this size;
- Encroachment onto Siddington;
- Use of open space will be limited by gas pipeline, SUDS and existing sewage pipes;
- Critically important woodland belts are located outside of the site;

Biodiversity

- Inadequate/insufficient survey work:
- No dormouse or water vole survey submitted;
- More detailed bat survey required;
- Further reptile survey required;
- A detailed assessment of the impacts of the proposal on farmland birds is required;
- Need to understand cumulative effects of the proposals;
- Loss of native hedgerows which would contravene the Hedgerow Legislation (1997);
- Loss of wildlife and habitats;
- Independent surveys are required;
- Hedgerows classified as species-poor when previously they were classified as species-rich;
- Incorrect location for dormouse survey tubes.

Flooding and Drainage

- P3 is not a pond-it only fills and empties again in response to rainfall-in winter it consumes a massive volume of rainwater;
- Flooding already occurs in the area;
- Existing sewage system cannot cope;
- No reference to temporary sewage treatments works which could pollute aquifer etc;
- No coherent plans to update the sewage system;
- Possible effects on water supply and water pressure;
- Will proposed SUDS cope with all of the surface water once the development has been built?
- Proposed sewage infrastructure would not entirely be within application site;
- New sewage pipe to Shorncote Sewage Works need to be implemented as a matter of urgency;
- Potential for pollution from the discharge of untreated effluent from Shorncote Sewage Works in Shire Ditch (South Cerney) unless capacity increased;
- It has been noted that surface water at the site flows in the opposite direction to the proposed SUDS-what guarantees are there that new and current residents will not be swamped?
- CDC must seek detailed independent report on the real capacity of sewage treatment works;
- Existing sewage pipes have been incorrectly plotted
- CDC should commission independent reports into feasibility of SuDs and capacity of Shorncote Sewage Treatment Works.
- On-going maintenance of SuDs is essential.

Infrastructure

- Secondary school provision will be required;
- Capacity in Chesterton Primary school for development and Siddington Primary school (which needs number to sustain itself);
- Need for a new primary school is questionable;
- Insufficient capacity at schools, doctors surgeries, limited hospital service;
- How much of land value will be spent on infrastructure?;
- Impact on facilities in the town;
- How will emergency services cope with additional homes?;
- How will water supply be achieved?;
- Insufficient capacity at Leisure Centre;
- Town centre cannot be expanded further due to physical restrictions;
- Restricted nature of the town will lead to more out of town shopping developments;
- Doctors are currently over-subscribed;
- Library is under provided;
- New infrastructure needs to be in place before development commences;
- Would supermarkets cope or would a new one be required?;
- Making better use of existing facilities would encourage new residents to integrate with the wider community;
- Contributions required towards the Master plan for the Amphitheatre, Querns Wood and our Acre Field (e.g. restoration of the Obelisk, an acoustic barrier along the A419 etc)
- With extensive and costly work necessary for sewerage and infrastructure can assurances be given that requirements will not be publically funded and will be provided by the developer?

- Remoteness of site from hospitals/emergency treatment which is particularly important given the higher than average age of the population in Cirencester.

Car Parking

- Insufficient, affordable parking in the town centre at the moment and situation will be exacerbated with the development;
- New householders would be landlocked as they would have no way of accessing the town centre because the car parks would be full;
- Inadequate parking in town already results in parking on Somerford Road which is unsafe;
- Increased parking demand from the development would result in high rise parking which is likely to be an issue in the town centre;
- Detrimental effects on business revenue because of existing parking shortages will get worse due to development;
- Visitors to the town are already dissuaded due to parking problems;
- Provide public/student parking on site;
- Review of parking along Chesterton Lane required if development goes ahead.
- Developer must be required to provide and fund a decked car park;
- High level of parking provision inside the development required;
- Roadside parking within the development will cause hazards, congestion and restrictions for emergency vehicles.

Other

- How will conditions and obligations be complied with/enforced?
- Few gains for the local community;
- Little or no convincing evidence of the benefits of the proposal;
- Cirencester will become a sprawling dormitory town to Swindon, Gloucester and Cheltenham;
- Amenity in Cirencester will not be able to handle the additional homes;
- Impacts of a 15 year construction period;
- Views of residents have not been taken into account;
- Difficult to view the application and members of the public will be deterred from making comments;
- Long term residents of the town would find life in a busier town stressful and would have to move;
- More retirement/care facilities may upset the demographic of the town and turn Cirencester into a retirement town;
- Lowering of social status if the town;
- Do not use dark grey imitation Welsh slate-Kingsmeadow has the appearance of a ghetto;
- Taking farmland from tenant farmers is unacceptable;
- Locating student accommodation within the site will result in more buy to let properties;
- New dwellings will be marketed to people living in London;
- Eco-homes should be provided as a separate community within the site;
- The proposed proportion of the 7,500 extra inhabitants who will be over 68 is over 35%;
- 132kV power cable could in theory be upgraded if there is an increased demand for power as Cirencester continues to grow.
- 400kV power lines produce a substantial amount more electricity and magnetic fields than 132Kv lines and there are established effects;

- **The Health and Safety Executive set risk-based consultation zones around high pressure gas pipelines. For most cases standard decision tables are applied by the local planning authority using PADHI (Planning Advice for Developments near Hazardous Installations). But for borderline or difficult cases, a Quantified Risk Assessments are applied to obtain risk levels and to assess possible mitigation measures to reduce risks;**
- **How can the quality of the development be assured once the site is sold to housebuilders?**

Save Our Cirencester

Save Our Cirencester (SOC) is a group representing the town's residents. The group has submitted 44 representations, raising similar issues to those raised by Third Parties and the following issues:

- Considerable risk associated with a development of this scale;
- Possible future scenarios where the choice to build so many of the districts needed housing on one site could go wrong;
- Level of community involvement has been misrepresented in application;
- Application requires independent and additional scrutiny;
- Statements within the Sustainability Appraisal to accompany the Local Plan submission draft Reg 19 are questionable and reflect poorly on the soundness of the Local Plan on which the application is a major component;
- The delivery of a reduced size of development at Chesterton along with developments at north-eastern and south eastern periphery of Cirencester has the potential to limit cumulative effects on air and noise;
- There is no link between community and infrastructure projects being dependent on a huge strategic site being built;
- The regeneration of Cirencester is not based upon the delivery of the strategic site;
- Housing targets are influenced by the figure for projected total jobs growth over the Local Plan Period which are likely to be incorrect;
- Using a job forecast that is too high if the prospect of approval being given for housing but they are not built leaving blighted land or houses being built which are occupied primarily by people from outside the district who will commute by car thus failing to achieve sustainability;
- Failure to recognise the unknown but likely very significant effect of the self-employment on housing needs which calls into question the soundness of the Local Plan and the decision to build so many houses at Chesterton.
- The majority of the Cotswold District lies within the AONB with only a handful of settlements that are of an appreciable size-by allocating so many houses to Cirencester the Local Plan has sought to deal with a difficult problem by coming up with a flawed solution which will harm Cirencester at the same time denuding other areas of needed housing;
- Inconsistent decisions over sustainability issues appear to have been made in favour of the huge strategic site;
- Flawed distribution of housing does not accord with NPPF paragraph 10;
- Data used with the Transport Assessment is not comparable with the proposed development-the area (Chesterton Ward and parts of Watermoor and Water Park Wards) has a very different socio-demographic profile to that likely for the new development and almost certainly has a different travel to work pattern;
- Development will fail to accord with paragraph 35 of the NPPF-the development could not provide a feasible means of amelioration the increased traffic pressure itself would bring;

- Doubts regains public transport expectations based on experiences at other housing developments in Cirencester;
- UK weather, safety, personal security, location of the site, topography, inclines and work and leisure destinations will inhibit use of cycling;
- There is a real reluctance to walk;
- Bypass already causes a severance effect to 25% of the towns population who live on the south side of the town, if the development goes ahead that will apply to 40%;
- The development will result in the built up area of Cirencester becoming very lop-sided, distorting the symmetry of the town;
- It will be impossible to overcome the problems of severance and distance;
- Doubts regarding modal shift;
- Detrimental effects of a flawed forcing of green space because of site constraints;
- Deployment of green space diminishes its benefits to residents-most of the residents will not benefit from the open space;
- Delivery of affordable housing at Chesterton will fail to meet the requirements for the District;
- Over-provision in Cirencester and the South Cotswolds;
- Many of the proposed improvements (e.g neighbourhood centre, primary school etc) are necessary for the development and are not benefits to the wider Cirencester community;
- Over 60% of applicants on the Housing Needs Register for the District want to be located in other parts of the District other than Cirencester.
- Overwhelming feeling of the Cirencester community is one of fear, fear of adverse impact not only to the quality of the lives of the current inhabitants but also of new residents that might move here;
- CDC have failed the community in not communicating with them.
- Inadequate consultation;
- Decision makers will wrongly assume that extensive highways information proves objectivity and thoroughness;
- Delivery of 200 dwellings a year will result in properties that cannot be sold and bankrupt developers;
- Risk to health of Children in the town due to traffic related air pollution;
- Air Quality assessment is based upon outdated reports;
- Modern scientific opinion regarding air quality should be taken into account;
- OAN target should be reduced for the District as the AONB covers 80% of the District-the Local Plan fails to account of and places an unfair burden on Cirencester
- Application site is made up of three different size developments-to the east, west and north (Somerset Road parcel);
- Unsustainable to have traffic from travelling through the existing off site road network to get across the site;
- The air quality assessment has not been reviewed adequately and judgments and predictions have been made on flawed evaluations;
- Extensive reports dealing with ecological matters but absence of evidence that evaluate the effects of development on Cirencester inhabitants;
- Concerns regarding the potential route for construction vehicles and impact upon Cranhams Lane;
- Allocating 3384 homes for Cirencester within the emerging Local Plan is in excess of the 2280 that are actually needed. The number of dwellings required to accommodate people who work in the town but do not live in the town can be dismissed;
- Excess of dwellings in Cirencester will mean more out commuting for people working out of the town;
- If house sales do not materialize an overprovision would lead to serious housing market consequences/detriment;
- Safety concerns regarding at level pedestrian crossings;

- A local detailed analysis is required where NO₂ predictions are above 90% of EU legal limits on pollution;
- **An emergency plan for the high pressure gas pipeline would be imperative due to the change in status from rural to sub-urban;**
- **There are no employers proposed to move to the site;**
- **One multi-storey car park is not going to cover the shortfall in car parking spaces created by this development;**
- **Traffic modelling fails to take into account town centre works;**
- **Families who have moved to Cirencester have found the primary schools to be full and so their children have had to travel elsewhere including Wiltshire;**
- **A bond should be paid by the applicant to ensure that the planning obligations are delivered;**
- **There is no evidence to support the employment figure claim;**
- **Source data for traffic volumes has used a resident profile (over 50% retired) which does not represent the use and frequency of the car use of a younger and more active resident profile (SOC).**

SOC Comments Regarding the Amended Plans (Oct and Nov)

- Constant tinkering of the proposal in the hope that the amount and severity of objections will be watered down;
- Amendments are trivial compared with the huge impact of this development;
- Adjustments to comply with HSE regulations have resulted in a reduction in building land;
- Maximum heights have been reduced by a very small margin which will make no significant difference to the appearance of the development.

SOC review of the ES

- The traffic assessment guidelines used by BDL in the EA are “Guidelines for the Environmental Assessment of Road Traffic” published in 1993 by the IEMA;
- These guidelines state that up to 30% increase in traffic volumes on any road due to a development is not considered to be an issue and does not need further investigation;
- Guidelines are outdated and do not take into account impact of diesel emissions and should not have been used in the EIA;
- A 2004 study suggests that for a gradient of 4 degrees if only uphill travelling is considered then Nitrogen Dioxide emission rates increase by just below 50%-certain roads in Cirencester have significant gradients;
- Acceleration has also been shown to increase Nitrogen Dioxide emissions as a percentage increased by approximately 56% compared to when cruising. Deceleration causes an increase in emission of 31%;
- Brake dust can contribute significantly to non-exhaust vehicle emissions-there will be considerable brake wear at the lower ends of the A429 close to Cirencester Hospital and the Burford Road where heavy traffic and significant HGV numbers will brake to stop at roundabouts and traffic lights. Non-exhaust sources need to be included in any vehicle pollution modelling;
- Vehicles waiting at traffic lights will significantly increase pollution –expert opinion may be moving towards elevated walkways and underpasses;
- Burford Road should be included within the ES analysis;
- All residential streets should be considered to be sensitive receptors;
- Modal shift is overstated;

- Update to air quality assessment in July 2017 shows air pollution concentrates towards and even closer to EU air pollution limits;
- Uncertainty has not been correctly factored in to the model and there is a significant risk that air pollution at a number of locations within Cirencester will be above legal limits.
- **SOC sent two representations directly to Members prior to the September meeting which were included within the Additional Pages (2) dated 20.09.2017 and Additional Pages (4) 25.09.2017**

Park Community Group

Three representations have been received from the Park Community Group objecting to the OPA. The Group represents 200 people living and working in Cirencester. The objections raised were similar to those raised by third parties and within the first representation referred to the following issues:

- Under-reporting of the impact of the development upon the setting of the AONB, agricultural land classification, ancient hedgerows and the impact of the gas pipeline;
- Scale of development, affordability and mix of housing;
- Infrastructure and service provision;
- Sustainable travel;
- Natural and historic environment;
- Local Economy;
- Climate change and flood risk;
- Sustainable development;
- Failure to comply with existing local plan policies and prematurity;

A second representation was received raising the following issues:

- Greater and proper explanation of the proposed homes for the elderly is required;
- Cirencester's medical roads will be turned into "rat runs";
- What steps will be taken to prevent road degradation during construction?;
- More suitable site with ease of access can be found in South Cerney and Siddington areas;
- Opposed to densities more familiar in big towns and cities;
- Concur with comment made by SOC in relation to air quality and the proportion of growth allocated to Cirencester.

A third representation was included within the Additional Pages (4) dated 25.09.2017 raising the following points discussed at a public meeting held 05.09.2017 as follows:

Consultation (inadequate and concerns raised have been ignored);

Bulk Infrastructure (inadequate mitigation for the impact on existing infrastructure);

Community Resources (concern regarding appropriate phasing of community infrastructure/amenities);

Flawed data and non-existent data (trip rates and pollution);

Process (determination in advance of the Local Plan).

AQIVA (Friends of the Amphitheatre, Querns Wood and Four Acre Field)

AQIVA is a voluntary group of local people who are seeking to ensure that the amphitheatre is improved and made more accessible. The comments raised are specific to the Amphitheatre, Querns Wood and Four Acre Field.

- The development should make provision for the upgrade and ongoing management of the footbridge in the form of painting and resurfacing and long term upkeep;
- Strongly supports the crossing at the Waitrose roundabout but object to the design;
- Supports the proposal to upgrade the farm track;
- Desirable for the development to provide cycle parking facilities near the 4 Acre Field entrance;
- No provision of a future extension of a footway/cycleway towards the Amphitheatre has been included;
- No provision of cycle storage at the Amphitheatre for residents of the new development;
- Lack of footway/cycleway provision across the Amphitheatre, Querns Wood and Four Acre Field.

Cirencester Ramblers

The organisation commented that the development offers no improvement to the public right of way network to the west or the south of the development-this would provide opportunities for healthy exercise, access to the countryside and the potential for non-mechanised travel to Kemble Station.

Cirencester College

Cirencester College submitted a representation prior to the September meeting which were included within the Additional Pages (4) dated 25.09.2017. The representation covered the following issues:

- **Safety concerns regarding traffic lights at the RAU roundabout and the proposed right turn from Chesterton Lane;**
- **Safety concerns regarding the proposed pedestrian crossing at the Chesterton Lane/A419 junction;**
- **Section 106 contribution towards additional classroom accommodation required.**

Third Party Support

Severn letters of support have been received including one on behalf of the Royal Agricultural University and Cirencester Co-Housing The summary of the issues is as follows:

- More fairly priced homes needed for first time buyers;
- There is a requirement in Cirencester for type of housing that the development would provide;
- Potential for co-housing within the development;
- RAU support for the employment and social uses proposed within the development;
- Provision of student accommodation welcomed;
- Provision of affordable housing welcomed to support lower paid employees;
- Southern roundabout would not be within the setting of the RAU listed building;
- Landscape buffer will minimise the visual impact experienced by the RAU and help to preserve the setting of the RAU listed building.

Third Party General Observations

Four representations were received from Third Parties that were submitted as “General Observation”. Some of the issues raised have been covered in the objections section and other issues that have been raised as follows:

- The proposed green space between the proposed dwellings and the existing Chesterton development needs to be a priority so that it is not compromised by financial considerations;
- Buildings should meet passivhaus certification standards;
- Good design protocols need to be adopted for the benefit of future and existing residents;
- Committed developments does not include at least 4 applications at Cotswold Airports;
- Underestimation of vehicle movements to Kemble railway station;
- Traffic forecasts for the A429/A433 have been underestimated-review of junction required;
- Bus service to Kemble station will not be sustainable;
- Addition of two new roundabouts to A429 will increase danger for cyclists-cycle link to Kemble required;
- Review of traffic impacts on Ewen.

Cirencester Civic Society

Cirencester Civic Society advised that it does not oppose the concept of the development in principle but has a number of concerns that they consider need to be addressed which includes increased traffic; congestion; additional car parking within the town centre; improved bus services; sufficient parking on site; drainage; viability; landscape impact; too many dwelling proposed; density; high proportion of affordable housing required; employment opportunities for local people; little attempt at an eco-friendly development; integration into the existing town.