

Traffic and road infrastructure

The JCS has not properly accounted for the increase in traffic volumes on the roads that will serve the mass urban extensions planned. There has been no up to date traffic modeling up to the final public consultation in August.2014

Paragraph 162 of the NPPF says that authorities must "assess the capacity of the infrastructure for transport".

Paragraph 156 says that "authorities should show the provision of infrastructure for transport".

Considering the A46 corridor between Brockworth and Cheltenham, previous traffic studies for previous applications{ far smaller than is proposed by the JCS) concluded that the road was already "broken" and so no further harm could be done (source Entrans Ltd for Leckhampton and Warden Hill Parish Council). In the Entrans report, it was found that the 650 houses at Leckhampton would add 195 vehicles at peak times to the A46 (based on 0.6 per household). This would extend the current queue length of 0.8 - 1.2 km to 2.4 Km! ; this would reach Badgeworth Lane. With the addition of Brockworth's allocation and Brizen Farm into the corridor it is easy to see that the A417 junction will be threatened too. Entrans did instigate modeling on the roads in Leckhampton and concluded that no mitigation measures could solve the severe intractable traffic issue of Moorend lights and Church Lane. Adding more cars to the road from the Brockworth end will only make things worse here. The JCS provides no evidence as to how it will conform to the NPPF on this matter.

One of the key aims of the Gloucestershire Local Transport Plan 2011-2026 is to "reduce the impact of traffic especially from new developments" (para 1.8)

The A46 cannot conform in any manner to this policy as it already carries 15k to 20k vehicles per day, which is the second highest category in the GCC LTP traffic flow survey. For comparison, the A417 carries 20 - 50k but this is dual carriageway.



Photo showing constant stream of traffic on A46 18.07.14 8.15am.

The JCS has not acknowledged this situation but is allowing voluminous amounts of housing to be put at each end of the corridor. No attention has been paid to the GCC policy and indeed the situation is creating the very scenario, the County Council is forming policies to solve.

Traffic volumes have grown by 6% between 2000 and 2006 {source: GCC LTP) so a 6% growth from 2006 to 2014 would put the traffic volumes of the A46 in the same category as the dual carriageway the A417.

Badgeworth Lane junction with the A46 is the most congested in the county (source GCC LTP para 3.9).



Photo of Badgeworth Lane Junction 18.07.14 8.20am

Overloading the A46 will not achieve "economic competitiveness and growth by delivering efficient and reliable transport networks (source: GCC LTP and also key aim of the JCS). The JCS policy is providing places to work and places for people to live. It will not attract these jobs if improvements are not made to the A46 and infrastructure generally.

There would evidently be a high dependence on developer funding to achieve improvements to the A46. The NPPF para 173 says that "authorities must ensure such costs still enable the development to be deliverable". The JCS has provided no evidence that improvements to infrastructure will be funded. This is contrary to the JCS own policy SAI which states "infrastructure will be provided by the developer in line with needs arising from the development".

The GCC LTP para 3.51 also recognises that to meet projected growth, investment will be needed. The JCS has not secured investment to support the proposed growth

Paragraph 1.12 of the GCC LTP states that it wishes to promote "walking, cycling and other low carbon modes". Putting more traffic onto the A46 will actually deter these modes of transport and further delay buses too.

In summary, the JCS has not given evidence of the impact that the urban extensions will have on infrastructure nor put in place measures or secured funding to mitigate increase in traffic flows. Policy C7 of the JCS has failed due to the lack of transport modeling to support the plan.

Strategic Sites

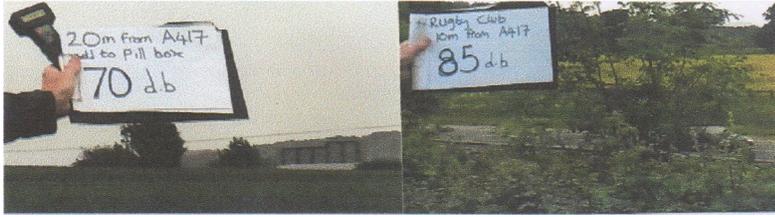
The land at Brockworth has four features which make the site a questionable choice for a massive urban extension. These are ..

- A. Traffic noise
- B. Historical buildings and their setting
- C. The presence of Henley bank Kennels
- D. Landscape assessment

A) Noise

The JCS has no apparent assessment of noise levels for Brockworth and other identified strategic sites.

Noise recordings have been taken across the site (Source Save Brockworth's Green Belt) and the data is shown below. Although the survey has been conducted by amateurs, it does prompt and indicate the need for this issue to be investigated more thoroughly with a professional noise assessment.



Sequence of noise recordings at set distances from the A417 at Brockworth April 2014 7.30pm. Note that even at 50m from the road the bench mark 55db is still not achieved.

With regard to the data, it should be noted that much higher readings were recorded when HGV's passed together as per the photo below.



The A417 adjacent to Brockworth; a major freight route between the M4 and M5.
When 2 HGVs pass the decibel readings on the plot are 90db.

This gave readings of 90+ db. which are higher than readings at Michael Wood Services (72 -75db). No amount of mitigation would render a motor way service station as a suitable place to live so why is this one?



Decibel reading at Michael Wood Services 28.07.14 11.30am - this is the same level as the Brockworth Green belt alongside the A417.

These levels of noise pollution are far too high for the site to be considered as a suitable place for housing. Indeed, PG24 of the NEC states the same in that if followed, two thirds of the plot is deemed "unsuitable for development".

The governments Transport Ten Year Plan 2000-2010 forecasted a traffic increase of 29% over the period on such major routes as surround the Land North of 8rockworth. There is no reason to believe that such growth levels will not continue in the future particularly if the Air galleon roundabout is improved with the "missing link". This will pull in a greater amount of traffic down the A417 and result in an above average traffic growth.

The A417 is a national strategic route and a Euro-route and carries 20k-50k vehicles per day (source Gloucestershire LTP. A 2 9% growth as noted above would see the A417 carrying the same volume of traffic as the MS currently does (50K+) in under 10 years' time. More traffic means more noise.

The European Noise Directive gives 55 db. as a base line tolerance for quality of life the land at 8rockworth only achieves this on its outer boundary which is only one third of the plot. Noise pollution is a significant factor affecting quality of life. A survey carried out by Transport for Quality of Life 278 gave the following key findings from inhabitants of homes affected by noise;

Sleep disturbance

Enduring over heated houses to avoid opening windows

Limiting the way they use their gardens

Reduced property prices

Difficulty selling houses

General negative affect on well-being

The A417 is a major freight route and carries the same volume of HGV's as the MS (1000 + movements per 24hr period source: GCC LTP 20011 -2026). Indeed, in the same document, GCC promote the road as a route for HGV's. The noise recordings show that major peaks of 90db are recorded when to HGV's pass together. Evidently these peaks are going to coalesce in the future to become the norm.

The NPPF para 17 requires authorities to designate land "that is suitable for development" and para 109 states that "new developments should not be at unacceptable risk of being adversely affected by noise pollution". As shown above, the JCS has failed to comply with the NPPF.

In summary the JCS has failed to assess noise levels realistically and is therefore in breach of the above policies of the NPPF. . With ever-increasing traffic volumes, mitigation measures will struggle to reduce the noise levels to the extent that the plot becomes a suitable place to live with a decent quality of life. As such, the Brockworth plot is seemingly not suitable for development.

B)Heritage assets and landscape setting

The JCS Landscape Characterisation Assessment notes the "historically significant" St George's Church, Brockworth Court and associated buildings with its ridge and furrow field system and well established native hedgerows. The church is noted as a "visual landmark" and the court and its surrounding landscape is of "visual interest and amenity value and has time and depth". The orchard is "visually significant". The JCS also commissioned ECUS in March 2014 to look at this aspect of the strategic sites. ECUS noted about Brockwoth that it had " major heritage concerns to development in the area".

The JCS policy S6 p84 states "development is required to have regard to ...historic character, and protect or enhance landscape character" and a key aim of the JCS is to assess "scenic quality, notable buildings and church spires".



St George's Church & Brockworth Court both grade I listed plus grade 2 tithe barn. Their setting in the landscape are key heritage assets in Brockworth. JCS has taken no action to protect them.

By earmarking 100% of the Brockworth plot for development the JCS has not provided evidence as to why it is not adhering to its own policies and protecting the very observations that it has listed as being important plus the findings of its own consultants. This lack of protection to the heritage

assets is also contrary to the NPPF para 129, which requires authorities to "assess how the heritage asset will be affected by the development proposals". This has not been done.

So whilst the JCS has made note of Brockworth's heritage assets and their setting, it has not shown how they should be protected or that development will not lead to "substantial harm" (NPPF para 133). It has, in effect, ignored its own findings. The JCS has over looked this planning requirement and duly proposed 100% development of the site with no adherence to the NPPF. As minimum, a significant buffer zone around the assemblage of church, court and orchard should be illustrated on the drawings as per NPPF guidelines.

The JCS consultation response document pages 52-54 duly lists these issues as being raised by respondents but also fails to action any of the points at all.

C) The presence of Henley Bank Kennels

The process of earmarking the land north of Brockworth as a strategic site has failed to identify the presence of Henley Bank Kennels. It is basic planning conditions that such businesses need to be well away from residential areas. No mention has been made in the JCS Landscape Assessment of the kennels whilst plentiful other observations were made in the Landscape Character Assessment such as presence of factories and other buildings.



Henley Bank Kennels was not noted in the landscape Characterisation Assessment despite it being an impediment to development.

Furthermore, no evidence is offered as to how the noise from the kennels will affect the proposed housing. Should there have been a car breakers yard, a small industrial unit or any other such industry they would surely have been noted. With dogs, it is not the actual statistical level of noise that can be recorded and judged upon, but rather the fact that it can be heard at all and the persistence of it.

If it were the scenario that a kennels applied for planning permission to locate WITHIN an existing residential area, the answer would most definitely be "no" whatever noise mitigation measures might be offered. As such why is it seemingly acceptable to do it the other way round?

The locations of all the kennels listed in the Gloucester area Yellow Pages; without exception they are all in rural locations with no near neighbours, just as Henley Bank Kennels currently is.

In summary, the kennels is a significant planning issue and a significant impediment to residential use, which has failed to be recorded by the JCS. This calls into question the validity of the assessment of the development sites as a whole.

D) Landscape

The JCS, in its Landscape Characterisation Assessment, has made observations as to the landscape value of plots 620 and G 21 in Brockworth. These observations have not been utilised in the designation of Brockworth as a strategic site. Below is the table of criteria used in the assessment and in the next column is how they relate to Brockworth's green belt.

Criteria	Present Y/N	Evidence
Notable buildings	yes	St George's church grade 1 listed, Brockworth court grade 1 listed, Tithe barn grade 2 listed
Church spires/tower	Yes	St George's church
Public rights of way & accessibility	Yes	Very accessible. Linear routes following Horsebere Brook & along mid-section field boundary to the church and court. Well used by dog walkers and for local strolls.
Visibility and prominence	Yes	Visually connects with the AONB to SE and to Chosen Hill and Shurdington Green belt to N & NW
Landscape condition	Yes	Actively farmed fields in a non-neglected condition. Hedges regularly cut and managed.
Visual detractors in east section	Nil	No urbanising features apart from Henley bank kennels. Undulating countryside giving good scenic quality. A417 not visible as is sunken.
Views into and out of the plot	Yes in east	Significant views from world famous Cheese Roll Hill. Uninterrupted visual connection to AONB to SE and to Chosen Hill to N.

The presence of notable buildings has been covered in section **b)** of this response.

With regard to visibility and prominence, the JCS LCA document contradicts itself in that it states "the MS and A417 have minimal visual impact" page S section K,

but then states that" Brockworth is visually separated from land to the North". It does not state what is causing the separation but the statement is untrue as proven by the following photograph;



Panorama of Brockworth green belt taken from Coopers Hill. Note that the A417 is invisible and so Brockworths green belt is visually connected to the rest of the green belt. This is a world famous and iconic view because of the Annual Cheese Roll event which takes place at the summit.

With reference to public access, the land at Brockworth is well used and highly valued by local *people* enjoying the countryside and scenic views and taking walks along the public footpaths . . There are guided walks from the library and the access to country side is used by running clubs, scouts, brownies and the local schools . No measure of this usage has been taken by the JCS.



Collage of photos of users of the land at Brockworth ; Photo no 3 is Brownie leader. The footpaths are popular even on a muddy Winter's day!

In summary, it would seem that the only land that the JCS does not see as potential for development land is that containing picture perfect farmsteads, intimate field boundaries, lots of historic buildings, church spires, no major roads present, perfect tranquility and crossed by national trails. This is unrealistic qualifying criteria and is impossible to find apart from in a National Park or an AONB perhaps. Consequently, any low-lying land around the three JCS settlements appears, in JCS terms, to qualify for development.

The Landscape Characterisation Assessment has not accurately assessed the land at Brockworth . It has not been acknowledged that there is a continuity of landscape with the rest of the greenbelt to the North, right through to Shurdington. It is certainly not cut off or fragmented or visually detached. Indeed, the course of Hosebere Brook, which is noted, by the JCS, blends the existing housing fringe into the landscape. To build beyond this boundary would visually impact on the landscape and surrounding views of the Cotswold escarpment and Coopers Hill AONB

The eastern side of Brockworth's green belt is directly over looked by the AONB. Policy S7 4.72 states that "development close to but outside the AONB has the potential to have a detrimental impact on its setting, for example from key views".

Brockworth's green belt is, indeed, seen from the key and iconic viewpoint of the world famous Cheese Roll Hill (Coopers Hill). From here the green belt to Shurdington is uninterrupted because the A417 cannot be seen. This view would be degraded by development. To prove the point, the JCS states in the LCA page 37 that "the east section has a lack of association with infrastructure". Similarly, looking across to the land from the North, there are fine connected views with the AONB.



East side of Brockworths greenbelt; view looking N to Chosen Hill. Note that the A417 is invisible (apart from the gantry) and so there is complete visual connection with green belt land to the north.



East side of Brockworth green belt; view SE to AONB. The plot is visually connected to the escarpment and of high landscape sensitivity.

Food Production

Paragraph 112 of the NPPF says, "Authorities should seek to use poorer quality land in preference to higher quality". This has not been applied by the JCS submission document.

The land North of Brockworth is grade 3a and 3b agricultural classification, which is described in the classification as the "best and most versatile". It grows arable crops of wheat, barley and oil seed rape. The photograph below shows the current crop of oil seed rape. Other JCS key sites are mainly grade 4 lands used only for pasture.



Fields in Brockworths green belt are all grade 3 agricultural land; crop Of wheat 2014

This loss of this food producing area, in opposition to the NPPF has been highlighted to the JCS and indeed noted in the consultation response document pages 52 -54. However, no action was set against the issue. As such, it has been ignored rather than explained why it has not been taken into consideration.

Strategic objective No_6 of the JCS states that it will " protect the highest grade agricultural land". It is apparent that the JCS has failed to do this and no evidence has been given as to why, land of the highest agricultural quality is still being put forward for development.

The JCS is quite correct in stating that it is important to protect such quality agricultural land to preserve our nation's food security. This notion may sound somewhat grand but every bit does help and it is the constant, small-scale loss that makes a big difference. Indeed the March 2014 Conference of the National Farmers Union debated the topic and informed delegates that the country's food self-sufficiency was down from 71% to 64% over the last 20 years and the main reason was "wanton urban sprawl and over-development".

Agricultural quality was not a criteria considered in the JCS Landscape Assessment. With reference to the land at Brockworth the large field sizes were considered a as a negative feature when in fact this actually indicated that there is intensive agriculture on this site.



Photograph looking south across Brockworth's green belt; the iconic view from the Cheese Roll Hill will be degraded by development on this site. Note that the A417 is invisible and the landscape is visually continuous right through to the AONB.

The JCS has classified the east section of Brockworth's green belt as "medium - potential for housing though will need to take account of landscape sensitivity and quality". No evidence is shown in the JCS document that anything has been taken into account as the plot is still proposed for 100% development. As described in this section above, there is strong evidence which contradicts the classification which has been missed or not used to make the assessment. The bench mark at which a site should not be developed is set far too high and is impossible to achieve.

The JCS assessment of the strategic sites, particularly Brockworth, is unsound.