## PLANNING APPLICATION 16/05245/OUT Land West of Kingshill Lane 6 February 2017

I am writing on behalf of CPRE South Cotswold District to object in the strongest terms to this planning application. Our grounds for objecting are:

## 1) It will greatly damage the rural approach to Cirencester and undermine the demarcation between Cirencester and the village of Preston.

One of the defining features of Cirencester is the way the town is approached through green wedges giving the impression that the countryside runs into the town. One such wedge is that following the A419 from Siddington House to the roundabout junction with the ring road. On the right hand (northern) side of this whole stretch the built environment is set back from the road by substantial green space and therefore experienced visually as distant leaving a green approach to the town. The section of Kingshill Lane up to the football ground forms an important foreground part of this distancing effect; the proposed development will fill this entire area. It will appear as an expansion of the Kingshill Meadow development and an unwelcome urban development sprawl effectively bringing the start of the built up area to the Kingshill Lane A419 junction. This effect will be reinforced by the fact that the southern side of the A419 is already heavily developed. So far the visual impression of urban sprawl has been avoided by careful siting of the urban extensions and the character of Cirencester as a rural market town has been retained. This development would destroy that on this side of the town. The fact that the site itself is not of high landscape quality is irrelevant and in no way detracts from its role as a green buffer.

Fortey Farm and Barn stand at the corner of Kinghill Lane and the A419. They stand in isolation surrounded by fields strengthening the rural impression of this approach. They are listed buildings. The proposed development will run close up to these buildings and impinge directly on their setting.

We note that Thames Water indicate that the drainage system on this side of town is severely stretched. The application states that all utilities are in place and contains no plan to create bespoke drainage system.

Traffic from the development going into Cirencester will have to turn at the roundabout outside the new care village causing congestion with the steady stream of in-coming traffic on the A419.

In addition it has long been informal policy to keep the village of Preston and the town of Cirencester separate. This development would visually coalesce the two and invite further development on the eastern side of Kingshill Lane.

In contrast the Chesterton site, if sensitively developed, will not dramatically impinge on the rural approach to Cirencester on the Tetbury road and represents the best option for an urban extension to Cirencester.

## 2) The housing is not needed.

The latest version of the draft Local Plan 2011-2031 includes focussed changes. The plan is based on allocating land sufficient for 9,800 dwellings. This is well in excess of the OAN of 8,400. Moreover the plan shows quite clearly that there is much more than a 5 year supply of land and that the amount of housing that has been built or approved since 2011 well exceeds the annualised requirement up to 2020. While we believe that the trajectory for development of approved but not yet built housing is perhaps a little too front loaded we have absolutely no evidence that the permissions will not be substantially built out as approved. The key development to meet the balance of housing required over the plan period is the Chesterton site. We believe this is the best choice for a major strategic expansion of Cirencester. There is again no evidence that this site will not be developed within the plan period. Taking windfalls into account it is clear that the Local Plan is a credible statement of meeting objectively assessed housing need: indeed in our view more than need.

There is therefore no evidence to support the arguments put forward by the applicant that there is no five year housing land supply because there is no OAN, that there is shortage of housing up to 2020, and the Chesterton site will not be developed at least in the plan period. This last argument appears to rest heavily on the fact that the highways agency have put a 3 month hold on the application implying there is some fundamental problem with access to the Chesterton site. In fact the highways concern arises not with direct access to the site but that the possible effects on congestion at the Cherry tree lane, Burford Road and Fosseway junction have not been evaluated. The 3 month hold is to allow this evaluation to take place. As the junction is on the opposite side of the town to Chesterton it is very difficult to see how highways concerns will not be allayed by further studies. Indeed the effect on congestion at this junction would be of much greater concern for developments on Kingshill Lane.

The applicant also argues that the emerging Local Plan has no policy for sites adjoining development boundaries. One of the focussed changes has clarified this point; land outside the development boundaries is open countryside and therefore development should be very strictly controlled.

In our view this is an attempt to pre-empt the Local Plan and the setting of a development boundary for Cirencester which would exclude this site. We urge the council to refuse planning permission.

Nicholas Dummett Chairman CPRE South Cotswold District