Friends of Oakley Farm Pastures: Alternative Masterplan/Gradients Response

1. In response to the appellant's landscape note of 11 Oct 2021 and their email dated 10 Dec 2021 (regarding submissions as to why the inspector should accept the additional information that the appellant has provided on the alternative masterplan issue), the Friends of Oakley Farm Pasture Slopes, FOFPS, have the following observations (our bold/ footnotes):

Policy and Guidance

2. The appellant's Environmental Statement[1] at 9.2.15 states:

"The EIA transport assessment has considered the development proposals and transport issues with reference to national and **local policy and guidance**, as follows:

National Policies

• National Planning Policy Framework (NPPF) July 2018

Local Policies
• **Gloucestershire Local Transport Plan [GLTP][2]**
• Joint Core Strategy for Gloucester, Cheltenham and Tewkesbury (JCS)
• Cheltenham Borough Local Plan – Adopted 2006 (Saved Policies)
• The Cheltenham Plan – Emerging Local Plan …"

3. Within the GLTP, policies refer to complying with or being guided by the **Manual for Gloucestershire Streets, MfGS[3] and DfT LTN1/20[4]**

4. The appellant's transport assessment also considers the MfGS relevant and states that it has been considered. (Transport Assessment para. 2.33)[5]

5. From the content of the appellant's ES and Transport Assessment it is clear that they agree to be guided by local and national transport policy and guidance which includes GLTP, MfGS and LTN 1/20.

6. GLTP LTP PD 0.4: "…GCC will support development that enables sustainable travel choices and will require that developers of new medium/large sites submit site master plans and ensure that transport considerations are integral to the design of schemes and contribute to making high quality places, in accordance with Gloucestershire's Climate Change Strategy and the emerging Spatial Strategy, Carbon Reduction

[1] CD A36-A
[2] CD I5
[3] CD I4
[4] CD I1
[5] CD A6-B

Targets, NPPF and MfGS."; and under bullet point 8: "Developers are required to assess the needs of all vulnerable road users within and associated with their development, in line with the government Road User Hierarchy, to substantially improve the County's cycle and pedestrian network and the delivery of Local Walking & Cycling Infrastructure Plans (LCWIP) and where appropriate PRoW or multi-tracks, and meet improved design standards and audits; for example MfGS, LCWIP and other Context Reports and DfT LTN1/20 cycle design guidance and best practice, as well as addressing the needs of those with mobility impairments."

7. GLTP LTP PD 6.1 Gloucestershire's Pedestrian Network:

Bullet point 7: "All walking infrastructure provided within the county will be designed in accordance with MfGS…"

Bullet point 10: "Developers are required to make an assessment needs of all pedestrian/mobility users/cyclists in line with government Road User Hierarchy within and associated with their development. And to, substantially improve connectivity and permeability of the County's pedestrian network and meet improved design standards and audits; for example MfGS, LCWIP and other Context Reports and best practice, as well as addressing the needs of those with mobility impairments."

8. NPPF (2021) 112 states that "…applications for development should:

a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas…

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport"

9. MfGS: "Generally, the maximum and minimum gradients allowable on new developments will be as detailed…:[6]

All streets: [Maximum gradient] 1:20 (5%) but consideration given to 1:12
Active Travel Corridors: [Maximum gradient] 1:20 (5%)

Where a 1 in 12 gradient is proposed no length shall exceed 30m.

For clarity the gradient tolerances apply to private driveways and proposed streets."

[6] CD I4 MfGS page 30

10. We would consider it a not unreasonable assumption to read gradients of 1:12 (8.33%) as "gradients up to 1:12" otherwise a gradient of 1:12.1 (8.26%) could be deemed completely acceptable at any length. The appellant appears to concur with this assumption should it be the case that the inspector is in agreement with the GCC gradients detail. This is reflected in the proposed/modified condition 11.

The Alternative Master Plan / Planning Gradients Plan

11. There is doubt that the scheme can be delivered compliant with GCC's preferred gradients and so the appellant has provided a Planning Gradients Plan (PGP) with associated Planning Road, and Pedestrian and Cycle long sections plans to show one possible way of achieving this. Together with these plans the appellant has provided several accompanying photomontage images.

Landscape and Visual

12. The FOFPS make the following notes in this regard:

a. Photomontage (Photomontage link) figs 9 and 10 do not align with the Dwg 333.E.40.1 Planning Gradients Plan, in that the "main belt of screen planting" (per key in the alternative masterplan document) running across the site west to east, is much less dense and therefore less significant when depicted in the photomontages than it is on the PGP. This gives an inaccurate impression of openness to the viewer from the Pavilion, both of the site itself and in relation to the distant views to Cheltenham town and its spires.

b. The appellant's landscape evidence claims "A key feature that has been retained within the appeal proposals is a broad swathe of open pasture that lies at the higher elevation of the site adjoining Harp Hill. This retains an open area of grassland that can be managed to reflect the ecology of the area and provide a potentially significant ecological enhancement. This retained openness at the most prominent elevated part of the site, will form a key strategic element in the wider green infrastructure strategy." And "The appeal proposals are in outline but have the potential to provide a significant, new public open space with natural appearance." It is our view that these statements do not align with photomontage figures 10 & 14.

c. Photomontage figs. 9 and 15 show the greater extent of ancient hedgerow loss required to accommodate wide cutting of the estate entry road.

d. Photomontage fig.10 depicts the outlook and views from the reservoir Pavilion at year 10 with trees in full leaf. This once open pasture

field is now scarred by a deep and wide manmade cutting to accommodate the equally scarring estate road. Near distance planting mitigation appears neatly positioned to hide the new housing in views from the Pavilion. However, during the leaf off seasons there will be no hiding the development from the Pavilion's outlook, an outlook that currently contains ancient and veteran oaks. Further, by approximately year 15, the middle and far distance mitigation tree planting, with continued growth, will remove the expansive views of Cheltenham and its suburbs as currently experienced from the Pavilion.

e. Street lighting and road signage omitted from the photomontages will add further degradation to the outlook from the Pavilion and to its pastoral setting.

f. The deep *c.*3m and steep sided cutting with batters proposed at no greater than 1:3 to the Eastern Road, will at best act as a deterrent to the use of the cross-site footpath and to those with mobility issues it will be an impassable option.

g. The cutting depth at chainage 175m of the Eastern Road will be *c.*1.5m with associated batters. This will require a break in the mitigation planting of *c.*25m. This gap will be easily visible from the escarpment visual receptors and the Harp Hill residential properties.

h. The required embanking to create the Connector Road, *c.*1-2m high, will elevate it above the existing ground level, adversely enhancing its prominence in views from the upper escarpment.

i. The estate roads, street furniture, significant engineering works and mitigation planting will significantly and detrimentally alter the landscape character of the upper slopes of this designated landscape.

Heritage

13. Photomontage figs. 14 & 15 show a view towards the Pavilion from within the site. Such a view was not provided in relation to the original illustrative masterplan, and these new photomontages demonstrate how the setting of the pavilion would be dramatically and adversely affected by the development.

Gradients and Engineering works

14. The FOFPS make the following observations:

a. From the Road Long Section Plans. When considering the Eastern Road between chainage points *c.*11m and 83m the average gradient is in excess of 5% for 71m (see Figs. 1 & 4) and between chainage points

*c.*228m and 405m there are significantly steeper average gradients in excess of guidance. The average gradient over this 162m long section is 1:13.7 (7.3%) including just one short 10m section at the normal recommended maximum gradient of 5% (see Figs. 2 & 4).

b. The Western Road in total is 305m in length with an average gradient of 7.2% or 1:13.9. Within this length there are only 3 sections, 46m total, of "slack" gradient at the recommended maximum of 5%. This road has steep average gradients over extended lengths which exceed guidance. One section runs for 58m at 8.6% (1 in 11.6) (see Figs. 2 & 5).

c. Of further concern are the small shorter roads and driveways leading from the site's main roads. Many of these are shown running parallel with the site's natural steep slope, roughly south to north. Considerable landform changes will be required for these roads to comply with the guidance gradients.

d. All of the average gradients are significant climbs over extended distances with little opportunity for cyclists, pedestrians or those with limited mobility to rest. We suggest that these gradients are in excess of the sustainability intention of the guidance on gradients given in MfGS, LTN1/20 and Inclusive Mobility and do not align with national policy NPPF para. 112.

e. The section of the Eastern Road which passes between the eastern fields 3 and 6 at chainage 270m, is proposed to be of reduced width (although this is not shown as such on the Planning Gradients Plan). At this point the road's gradient will be at its steepest. This 8.48% gradient will be particularly hazardous to cyclists attempting to ride up the hill, their speed will be very low at this point, reducing bicycle stability with the possibility of increased lateral movement on this narrow section of road. This is a safety concern.

f. Also at this field boundary, between trees T27 and T35, a *c.*1.5m cutting will be required. These engineering works are likely to impact the root protection area (RPA) of these two TPO'd trees contrary to planned conditions.

g. The Northern Road adjacent to tree T60 will require *c.*2m embanking within TPO'd T60's RPA. This is contrary to conditions.

h. The section of Cycle & Ped link between the Eastern and Northern Roads will require a significant engineered cutting, in part to a depth of *c.*4m. With associated batters or other engineering design this will intrude deeply into the RPA of TPO'd trees within Group 1.

i. From the appellant's Highways PoE: "…Pedestrian and cycle access will also be provided from Harp Hill to the south, including proposed pedestrian linkages at the eastern and western extents of the appeal site's Harp Hill frontage, and cycle linkages to Harp Hill via the proposed new site access junction."[7] And from the appellants Residential Travel Plan, "The internal site layout and site access arrangements will be designed in a manner which facilitates walking and cycling…".[8] We find little correlation with the estate road's proposed layout and its design gradients and that of national and local policy and guidance.

j. There is significant Severn Trent Water subterranean infrastructure within these upper fields that will be impacted by the engineering proposals. The relocation of this will no doubt create significant engineering works, resulting in further loss of the ridge and furrow and scarring to this valued landscape.

k. The appellant considers that mobility is relevant to the development proposal, but we can see little evidence to support this within the Planning Gradients Plan.

Conclusion

15. The appellant sets out to show how their gradients plan could comply with the GCC gradients guidance. However, it is our view that this plan falls well short of this and to make it compliant will require further significant and damaging engineering ground works to this part of the Cotswolds AONB.

16. The Manual for Gloucestershire Streets provides guidance to developers, on how new development within Gloucestershire can contribute towards the provision of a safe and sustainable transport network within the County. It is referenced in the Gloucestershire Local Transport Plan and the appellant considers its content relevant to the current proposal.[5] Should the inspector be minded to allow the appeal then we would consider the MfGS a relevant document.

17. This alternative/planning gradients plan is proposing major engineering works in this sensitive area which gives us further concerns regarding the impact that the development proposal will have on the local landscape character, the visual and landscape impact on the Cotswolds AONB and on the setting of the heritage assets.

18. The Landscape Notes provided by the appellant, in an email dated 12/10/21, accompanying the alternative masterplan / PGP include "4.

[7] CD C15-Appellant D para. 5.5
[8] CD A7-B para. 5.4. Residential Travel Plan.

…The landscape design objectives set out in the previously submitted landscape strategy remain unaltered. The illustrative network of paths remain virtually unchanged and the design intention to achieve an open space of natural appearance remains practical and achievable." In our response above we have shown that this design intention is neither practical nor achievable based on the revised masterplan / PGP.

19. Notwithstanding our concerns on the Landscape, Visual and Heritage impacts, this response document also delivers our thoughts on why the scheme as presented does not demonstrate gradient compliance or how it can be achieved. Further iterations may well demonstrate a gradient acceptable scheme, but at what additional cost to a designated landscape?

20. The proposal is neither sustainable nor deliverable in its current form in relevant national and local policy and guidance terms.

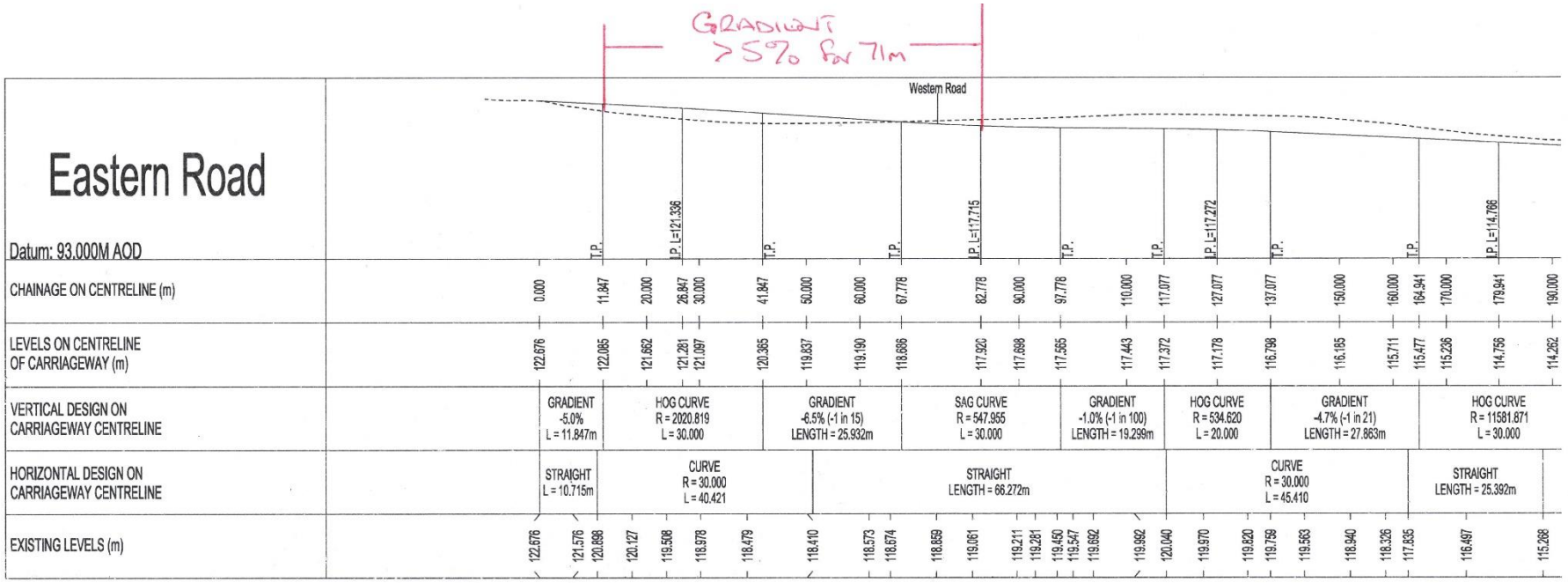

Fig. 1 Eastern Road Sections pt1

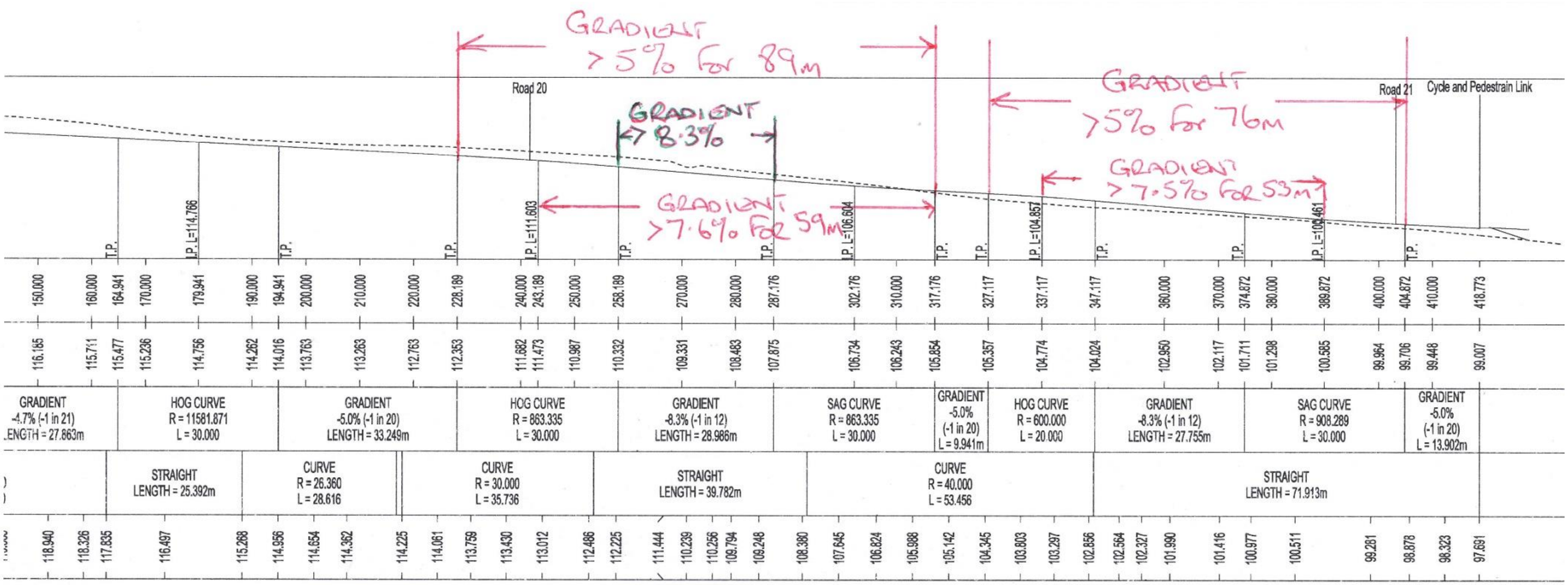

Fig. 2 Eastern Road Sections pt2

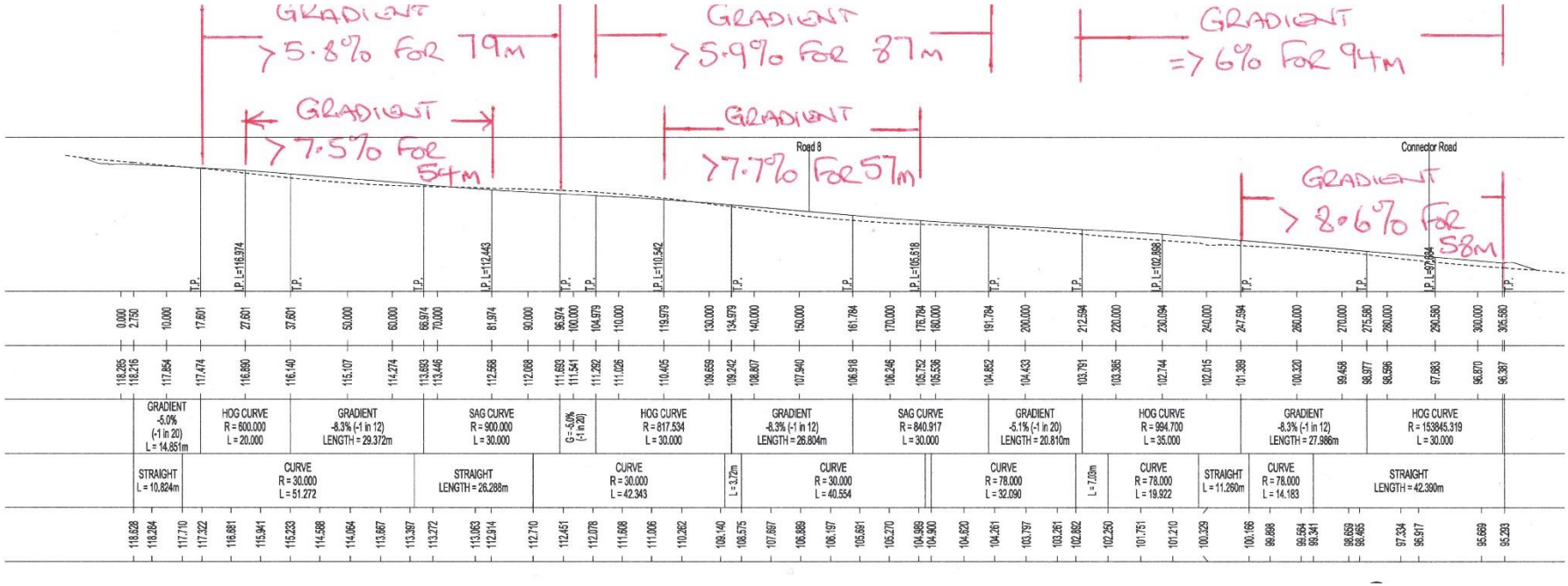

Fig. 3 Western Road Sections

Road	Start Chainage m	End Chainage m	Section Length m	Start Elevation m	End Elevation m	Elevation Change m	Gradient %	Gradient 1 in	>5% Gradient Section Length m	Cumulative Section Length m >5%
EASTERN ROAD	0	11.847	11.847	122.676	122.085	0.591	4.99%	20.05		
	11.847	26.847	15.000	122.085	121.281	0.804	5.36%	18.66	15.00	15.00
	26.847	41.847	15.000	121.281	120.365	0.916	6.11%	16.38	15.00	30.00
	41.847	67.778	25.931	120.365	118.686	1.679	6.47%	15.44	25.93	55.93
	67.778	82.778	15.000	118.686	117.92	0.766	5.11%	19.58	15.00	70.93
	82.778	97.778	15.000	117.92	117.565	0.355	2.37%	42.25		
	97.778	117.077	19.299	117.565	117.372	0.193	1.00%	99.99		
	117.077	127.077	10.000	117.372	117.178	0.194	1.94%	51.55		
	127.077	137.077	10.000	117.178	116.798	0.38	3.80%	26.32		
	137.077	164.941	27.864	116.798	115.477	1.321	4.74%	21.09		
	164.941	179.941	15.000	115.477	114.756	0.721	4.81%	20.80		
	179.941	194.941	15.000	114.756	114.016	0.74	4.93%	20.27		
	194.941	228.189	33.248	114.016	112.353	1.663	5.00%	19.99		
	228.189	243.189	15.000	112.353	111.473	0.88	5.87%	17.05	15.00	15.00
	243.189	258.189	15.000	111.473	110.332	1.141	7.61%	13.15	15.00	30.00
	258.189	287.176	28.987	110.332	107.875	2.457	8.48%	11.80	28.99	58.99
	287.176	302.176	15.000	107.875	106.734	1.141	7.61%	13.15	15.00	73.99
	302.176	317.176	15.000	106.734	105.854	0.88	5.87%	17.05	15.00	88.99
	317.176	327.117	9.941	105.854	105.357	0.497	5.00%	20.00		
	327.117	337.117	10.000	105.357	104.774	0.583	5.83%	17.15	10.00	10.00
	337.117	347.117	10.000	104.774	104.024	0.75	7.50%	13.33	10.00	20.00
	347.117	374.872	27.755	104.024	101.711	2.313	8.33%	12.00	27.76	47.76
	374.872	389.872	15.000	101.711	100.585	1.126	7.51%	13.32	15.00	62.76
	389.872	404.872	15.000	100.585	99.706	0.879	5.86%	17.06	15.00	77.76
	404.872	418.773	13.901	99.706	99.007	0.699	5.03%	19.89		

Fig. 4 Eastern Road Gradient Calculations.

Road	Start Chainage m	End Chainage m	Section Length m	Start Elevation m	End Elevation m	Elevation Change m	Gradient %	Gradient 1 in	>5% Grad Section Length m	Cumulative Section Length m >5%
WESTERN ROAD	0	2.75	2.750	118.285	118.216	0.069	2.51%	39.9		
	2.75	17.601	14.851	118.216	117.474	0.742	5.00%	20.0		
	17.601	27.601	10.000	117.474	116.89	0.584	5.84%	17.1	10.00	10.0
	27.601	37.601	10.000	116.89	116.14	0.75	7.50%	13.3	10.00	20.0
	37.601	66.974	29.373	116.14	113.693	2.447	8.33%	12.0	29.37	49.4
	66.974	81.974	15.000	113.693	112.568	1.125	7.50%	13.3	15.00	64.4
	81.974	96.974	15.000	112.568	111.693	0.875	5.83%	17.1	15.00	79.4
	96.974	104.979	8.005	111.693	111.292	0.401	5.01%	20.0		
	104.979	119.979	15.000	111.292	110.405	0.887	5.91%	16.9	15.00	15.0
	119.979	134.979	15.000	110.405	109.242	1.163	7.75%	12.9	15.00	30.0
	134.979	161.784	26.805	109.242	106.918	2.324	8.67%	11.5	26.81	56.8
	161.784	176.784	15.000	106.918	105.752	1.166	7.77%	12.9	15.00	71.8
	176.784	191.784	15.000	105.752	104.852	0.9	6.00%	16.7	15.00	86.8
	191.784	212.594	20.810	104.852	103.791	1.061	5.10%	19.6	20.81	107.6
	212.594	230.094	17.500	103.791	102.744	1.047	5.98%	16.7	17.50	125.1
	230.094	247.594	17.500	102.744	101.389	1.355	7.74%	12.9	17.50	142.6
	247.594	275.58	27.986	101.389	98.977	2.412	8.62%	11.6	27.99	170.6
	275.58	290.58	15.000	98.977	97.683	1.294	8.63%	11.6	15.00	185.6
	290.58	305.58	15.000	97.683	96.387	1.296	8.64%	11.6	15.00	200.6

Fig. 5 Western Road Gradient Calculations.