

Stroud Local Plan - Emerging Strategy Consultation

Dear SDC,

We write in connection with the above local plan consultation and having examined the plan we would like to strongly object to the integration of the areas below being included as potential areas for development and hence being formally included for future development as part of SDC's next local plan.

- PS29
- DUR 10
- DUR 11
- DUR 12
- DUR 13
- DUR 14

Dursley is a dispersed settlement where development proposals should be considered very carefully as the character and existing co-habitants' wellbeing and livelihoods could be detrimentally impacted. The areas proposed for future development is ill-considered particularly given the history of planning submissions made that have been made of the last decade.

The proposed sites (between Ganzell Lane and Uley Road) would lead to a substantial number of houses and have a detrimental impact on the surrounding environment. The development of these sites would have an adverse impact and outweigh the benefits of providing significant/substantial new housing stock. Such levels of new housing can be more sustainably achieved at the settlement of Cam and Dursley without creating significant and demonstrable landscape harm.

Despite the areas never being allocated for development within previous Stroud Local Plans, the areas have been subjected to numerous planning applications, most recently in 2014 (S.14/0966/OUT) and have been robustly rejected by both residents and planning authorities. SDC should look to the objections made and note the grounds surrounding the why the plans were rejected, and hence, should take heed that the proposed areas are not suitable for development.

The areas are outside the existing settlement boundary and adjacent to the countryside of the nationally protected landscape of the Cotswolds AONB. These areas make a positive contribution to the character and special qualities of this part of the Cotswolds and the AONB, and is visible from a variety of public viewpoints in the surrounding area and from areas within the AONB. The loss of this site to development would result in a negative impact on the AONB as the settlement would clearly be seen as expanding out into the countryside towards the AONB. As such the greenfield areas of land act as a natural buffer between the existing urban development of Dursley and that of the AONB. To quote the current AONB management plan 2018-23

"The surroundings and setting of the AONB are important to its landscape and scenic beauty. For example, views out of the AONB and into it from surrounding areas are a significant consideration for development and land management"

This document along with the CRoW Act 2000 places a responsibility on all authorities down to Parish Council level to consider the purposes of conserving and enhancing the AONB. Any form of development in this location would fail those requirements as it will be encroaching towards the AONB and is one of the salient reasons why a recent planning application (S.14/0966/OUT) was rejected. The NPPF also places "great weight" (Paragraph 172 of the NPPF) on the conservation and

enhancement of the AONB and AONBs have been confirmed as having the highest status of protection. Suitable provision for housing, which substantially avoids impacting on the Cotswolds AONB, should be adopted in the Local Plan. Outlining the areas above for future development does not satisfy this.

Pressure for development in the area is considerable but given the lack of employment opportunities and the demise of local industry such as Lister Petter, we struggle to see how any new development on the proposed sites will aid the regeneration of the area or make any real contribution to satisfying being a proportionate and sustainable development. Should the proposed areas be developed, houses will be sold to commuters travelling in to Gloucester or Bristol and place an ever increasing burden on traffic levels through Dursley towards the A38/M5. It is well known that the layout of Silver Street is particularly narrow with vehicles having to give way and pedestrians having to walk in single file on either side of the pavement. Previous planning applications have had access to the proposed site(s) via Shakespeare road, and whilst this consultation is not reviewing a formal planning application, developers are likely to resort back to previous plans with traffic passing through the Whiteway Estate (which is not an appropriate access point i.e. squeezing in access.)

Recognising this, we suggest that any form of large scale development should be near local infrastructure and transportation hubs e.g. M5 / Cam and Dursley railway station. This would be in alignment with public feedback and SDC's approach (as written in the SDC's emerging strategy paper) to satisfying Key Issue 1 on page 5:

"Key Issue 1: Ensuring that new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development."

Development on the proposed sites also goes against Key Issue 4 and is interrelated with Key Issue 1 that the correct strategy should be for housing to be located in the correct place which will avoid impacting on the natural environment:

"Developing strategies to avoid, reduce and mitigate the indirect impacts of development on the natural environment."

The distinction between Cam and Dursley has been lost and the two towns should be considered as one collective area. Dursley has undergone and is still undergoing a large scale development on the former Lister Petter site and the impact on the local services and resources are yet to be fully realised. Therefore, to meet the housing demands placed on the area, as mentioned above; any additional housing stock should be located close to transport hubs to facilitate access to other larger employment hubs.

We trust you will take our points raised above in to consideration which in conclusion do not support any development on the areas of land between Ganzell lane and Uley road.

Yours sincerely

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