

## **Comments on SDC Emerging Strategy Plan**

- Development strategy site: PS28: Old Dairy/Land off Prospect Place  
The site is identified for 10 houses and town centre uses. There are several constraints to this site that need to be addressed:
  - The access to the site is restricted, much of it is single car width – only the part from the back of the Lions Furniture Sales to the end of the Iceland service area is wide enough to let cars pass. The wider part of the area is partly rented by residents of Prospect Place for private parking, is used by staff of Iceland and is the delivery area for Iceland. This is also the Iceland secure food waste and other waste storage area. There is no other area available for this. Currently lorries delivering to Iceland reverse up the track. This manoeuvre is complicated. Sometimes it is possible for a lorry to park clear of the single car width track, whilst other larger vehicles block the access track. Whilst it is acknowledged this is dependent on the size of vehicle, the number of cars parked in the service area, and the proficiency of the driver, it is an issue. If the driver blocks the access this will remain blocked for on average 45 minutes. This can be inconvenient for existing occupiers, but this inconvenience would be more substantial if more properties were affected.
  - To widen the access would have several issues to resolve:
    - To achieve visibility splays at the junction of the access with May Lane would involve either demolition of no 11 May Lane or relocation of the Lions furniture store. The Lions would need to be able to relocate to a position that would be appropriate for the valuable service they provide. The impact of the demolition of no 11 on the character and appearance of the Conservation Area would need to be established, and is likely to have an impact on the development potential for the remainder of the site at no 11 May Lane.
    - Immediately beyond the Lions yard there would need to be safe vehicular and pedestrian access. This would need to accommodate the Iceland delivery vehicles, cars associated with both Prospect Place and with accommodation over shops on Parsonage Street, and pedestrians. Widening the access beyond the Iceland service area would involve removal of car parking spaces currently available to occupiers of flats on Parsonage Street. These spaces would need to be relocated. There is a drop in land levels between the existing parking areas and garden land beyond. This may make it problematic to provide parking areas in the gardens, even if property owners were happy to reduce the garden sizes. No 1 Prospect Place and The Coach House have doors which open directly onto the access track. To increase the amount of traffic using the access without improving safety to occupiers/visitors to those properties would increase danger to pedestrians.

- There would need to be a safe junction with the vehicular access to Prospect Place. At present the corner with The Coach House is completely blind.
- For Iceland to lose its delivery and waste storage areas would compromise its retail function. If Iceland were to close as a result this would severely compromise Dursley town centre.
- The land allocation seems to include 11 May Lane, rear garden and parking areas of houses fronting Parsonage Street, the Old Dairy window business site, land being planted with orchard to support a local cider business and land forming private garden area. There are constraints with potential development of the area.
  - Access as set out above
  - Badger main and subsidiary setts on site. Badgers are protected species and any new development will need to ensure that individuals using the setts and their supporting habitat are not harmed by the proposals. Badger numbers this Summer were five. There is some seasonal variation reducing to 3 in Winter. Within the garden areas of Prospect Place are other protected species present including amphibians using ponds for breeding in gardens, reptiles (slowworm and grasssnake) and a range of bird species. On summer evenings bats (also protected species) use the gardens as foraging and feeding areas. 9 Prospect Place has remnant orchard. This is a priority habitat and offers opportunity to expand into new planting areas associated with new planting.
  - All the buildings in Prospect Place are heritage assets, both within the conservation area and listed (grade II). Prospect Place and its setting is important. It is visible from longer views – Broadway and from paths around the quarry. Historic images of the town reinforce the importance and history of Prospect Place. Part of Prospect Place dates from 1655 and the majority is Georgian in origin. Any proposals for new development would need to demonstrate that the setting of the listed buildings and their significance would not be adversely affected. Of concern is there must be an acknowledgement that the land levels rise to the rear and towards the Slade, and new development on gardens of properties at Prospect Place should not dominate the existing, particularly from longer views or affect the setting of the town Conservation Area. On a previous application Historic England was concerned at the site extent being in excess of 1000sqm within a conservation area and there are a number of Grade II listed buildings surrounding the site. A Conservation Area Character Appraisal has not to date been undertaken. For example, 60 and 62 Parsonage Street (Grade II listed) adjacent to the site entrance was a former rope walk and therefore important as a surviving record of former activity in this part of Dursley. Furthermore, map regression indicates that buildings

stretched further back from Parsonage Street towards the latter part of the 19th century. In line with the *National Planning Policy Framework 2017*, planning authorities should look for opportunities for proposals within conservation areas and within the setting of heritage assets to enhance or better reveal their significance. This significance can be harmed or lost through development within its setting, which should thereby be described and assessed. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably. Additionally, the desirability of new development making a positive contribution to local character and distinctiveness should be encouraged. There has been no evaluation of the local architectural context and history of the site, specifically and with reference to the town as a whole. Additional analysis should inform the development layout and design of the scheme as a whole, but with particular reference to this part of the application site within the conservation area.

- The allocation site is archaeologically sensitive, since it is located within Dursley's medieval town. Ground works required for development in this locality may therefore have an adverse impact on significant archaeological remains relating to medieval settlement. Previous archaeological investigations have recorded a number of medieval pits just to the rear of the properties on Parsonage Street.
- It is also noted that in the Environment and Sustainability section (figure 7 Green Infrastructure Map), much of this site is identified as "large garden", with the inference that this is important. Development on this site is likely to conflict with policy ES1 of the adopted NDP. The gardens offer ideal greenspace and habitat in the urban area.
- Prospect Place and gardens contain a number of wells. These utilise spring lines which lead down to Water Lane where the spring lines emerge. There would need to be an assessment of groundwater conditions and risks of altering potential water quality or quantity. Pipework infrastructure services run along the main access track serving properties. The depth of this is relatively shallow owing to bedrock close to the surface. Any future construction phase would need to avoid loss of services or access to Prospect Place.
- It seems at present unlikely that all this site would be available at the same time. Any development proposal for part of the site should not prejudice development on the remainder or rely on amenity space being provided in an adjacent site. Planning should be on an equitable and holistic approach. Deliverability and viability will also be key considerations.

