

Dear Sir/Madam

I am submitting the following document as a response to Question 5.1a in The Stroud District Local Plan Review –Emerging Strategy Paper November 2018

Please find my submission to Question 5.1a below:

Cam & Dursley | Potential sites and alternatives

**Response to Question 5.1a – ‘Section 5.0 Making Places Shaping the future of Stroud District – Cam & Dursley Potential sites and alternatives – Dursley’ – Site PS29.**

In this document I will outline my assessment of the identification of site PS29 as a site for potential development.

I will split my response to questions 5.1a into the following sections;

- Background information.
- Case study planning application S.14/0966/OUT.
- Section 1. ‘Key Issues’ The Stroud District Local Plan Review –Emerging Strategy Paper November 2018.
- Stroud District Local Plan - November 2015 - Site PS29 is outside of the settlement development limits.
- Summary of answer in response to question 5.1a

**Background Information**

I am a long time resident of the [REDACTED] Dursley. Last year I made a contribution to the Stroud District Council Local Plan Review, Issues and Option Paper, October 2017.

My letter was in response to Question 3.6 – ‘Section 3.6 - Our towns and villages Broad locations and potential sites – Cam & Dursley – Dursley’ - Site DUR A. At the time, Settlement DUR A (North of Ganzell Lane) was identified in the Local Plan as a broad location for future growth. The settlement was split into the following sections. DUR010, DUR011, DUR012, DUR012, DUR013, DURO14. I concluded in my submission that I did not support the identification of site DUR A for potential future development. I will briefly outline the reasons why below:

- Historic evidence submitted in planning application S.14/0966/OUT.
- Negative impact on local area arising from vehicular access to DUR013 and any adjoining site via the Whiteway estate.
- Negative impact on local area arising from vehicular access to site DUR011/DUR012/DUR013 and any adjoining site via Ganzell Lane.
- Negative impact on local road network.
- Negative impact on the local landscape.

My submission was thorough and I believe reflects the views of the vast majority of local residents. Hopefully my letter is on file and can be revisited by Stroud District Council as it is relevant to this submission. I am therefore disappointed to see that in The Stroud District Local Plan Review –

Emerging Strategy Paper November 2018 site PS29 (formally DUR012, DUR013) has been identified as a site for potential development.

### **Case study planning application S.14/0966/OUT**

Concerns were recently raised about the suitability of a development on settlement DUR012/DUR013 (Now Site PS29) in April 2014 when a developer put forward planning application S.14/0966/OUT to Stroud District Council for the development of up to 100 dwellings on site DUR013. The decision of the application was 'Refusal' the appeal decision was 'Appeal Dismissed.' The response from local residents and the wider members of the public was overwhelmingly negative.

I would invite Stroud District Council to study in detail planning application S.14/0966/OUT. As you will see many of the concerns and objections are not specific to this planned development, they are wider concerns and objections that apply to this plot of land. I echo the concerns raised by the residents, Dursley Town Council and the then MP. Please see the following two letters;

1. Refusal of Outline Planning Permission [REDACTED] Duly Authorised in that behalf. Dated: 19/12/2014
2. Appeal decision letter from The Planning Inspectorate, [REDACTED] Decision date: 2 September 2015

In summary, planning application S.14/0966/OUT provides a wide range of evidence that is invaluable to Stroud District Council. This was an important planning application; it was also a high profile case with objections made by local residents, the MP and Dursley Town Council. Planning application S.14/0966/OUT provides the single biggest case against any future development on site DUR A (now Site PS29).

### **Section 1. 'Key Issues' The Stroud District Local Plan Review –Emerging Strategy Paper November 2018**

Last year, through the Issues and Option Paper Stroud District Council asked respondents to choose their top 5 key issues, challenges and concerns. In your Emerging Strategy Paper November 2018 Stroud District Council presented their findings. It appears to me that the Key Issues identified by Stroud District Council would be ignored if the council chooses to pursue in identifying Site PS29 as a site for future development.

'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. Your top suggestions for tackling this issue: Prioritise building on brownfield and infill sites, rather than greenfield and agricultural land; and locate development in areas where there is existing infrastructure, or where there is potential to improve infrastructure and public transport links.'

#### **Key Issue 1 – Vehicular access to site PS29 via Ganzell Lane.**

Site PS29 is not suitable for sustainable development. The site is located at the bottom of a single access lane used predominantly by agricultural vehicles. The entrance to Ganzell Lane from the A4135 is unsuitable for most vehicles due to the steep gradient. Most vehicles have an insufficient

ride height for the steep incline/decline, thus only road users with large 4x4 SUVs or large farm vehicles access the lane. Furthermore, Ganzell Lane is not wide enough to accommodate more than one vehicle; it is a single lane farm track. The width of the road is limited by several properties on each side of the track.

There is also the wider issue of the point at which Ganzell Lane joins the A4135. Whiteway Hill is a busy, very steep section of main road. The hill has been the location of many accidents over recent years as it has a number of limiting factors. Motorists tend to travel up the hill over the speed limit to carry momentum for the steep climb ahead. Older vehicles and HGVs struggle to slow down when travelling down the hill due to the steep and persistent decline.

The section of road where Ganzell Lane joins the A4135 is less than ideal. The junction is steep, blind and set some distance away from the main road. Motorists must accelerate hard to join this fast stretch of road in order to travel up Whiteway Hill. This is dangerous, noisy and severely compromises motorists travelling along the main road up the hill.

HGVs and slower travelling vehicles struggle when travelling up Whiteway Hill due to the persistent steep incline. Frequently, HGVs stop on the hill as the driver misses a gear; this causes the HGV to stop and reverse down the hill. Any increased chance of breaking momentum when travelling up the hill will be greatly opposed by motorists, in particular by drivers of HGVs.

There are also several distractions for motorists on this section of road. Local residents and ramblers frequently use the section of main road opposite the entrance to Ganzell Lane as a crossing point to access the local woodlands. There is also traffic entering the equestrian centre opposite the entrance to the Whiteway estate.

I believe that Ganzell Lane would be seen by local residents as totally unsuitable for vehicular access. I believe that no further houses should be developed on land that requires access via Ganzell Lane. In my opinion every one of the issues listed above would be made worse if Ganzell Lane was used as access point to Site PS29.

#### **Key Issue 1 – Vehicular access to site PS29 via the Whiteway estate.**

From studying the boundary of site PS29 it would appear that vehicular access to any development on the site would likely be via the demolition of the corner plot 24A Shakespeare Road. In the same way vehicular access was proposed to the site in planning application S.14/0966/OUT; I echo the concerns that arose in planning application S.14/0966/OUT.

Over the past 5 years I have seen an increase in the amount of properties on the Whiteway estate with one or more cars. This is largely due to the gradual transition from primarily older residents, with one car or perhaps no car, to younger couples and families with at least 1 car and in many cases 2+ cars. This has had a number of negative effects on the local road network.

Increased car ownership on the Whiteway estate has led to more traffic through the estate. This has caused rapid deterioration to the road surface. All of the roads on the estate are littered with large pot holes. The sections of road adjoining the curbs are in particularly bad condition with large 6 inch wide chasms in the road surface. This is a danger to pedestrians; many of the holes are also full of

grass which is extremely unattractive and leads to further deterioration to the road surface. Please see my photographic evidence submitted in my previous letter.

The pavements are also in extremely poor condition, they are cracked with raised manhole covers and broken curbs. Last year I witnessed a resident trip over a raised manhole cover on Tennyson Road, the resident fell face first in to the road and suffered facial bruising.

As mentioned previously, many of the households on the estate now have more than one vehicle. The resident's drives are only suitable for 1 – 2 cars. Many of the residents have more than 2 cars meaning they have no option but to park on the road. This problem is exacerbated by the arrival of visitors. This can lead to parts of the estate being quite hard to navigate when travelling in a car or larger vehicle, in particular in the evenings when travelling along Shakespeare Road.

The changing demographics on the estate from elderly residents to an ever increasing number of younger families with children present greater challenges for motorists. It would be realistic to assume that there would be some overflow, off road parking into the Whiteway estate as a result of any housing development on Site PS29. My concern is the adverse effect that this has on pedestrian safety, in particular child pedestrian safety. My concern would be compounded by the addition of short term, large construction vehicles and long term wider use of the road by residents who live at Site PS29.

If we took the proposed development of 80 dwellings on site PS29, even the most conservative estimate of each household owning two cars would lead to a further 160 cars accessing the roads of the Whiteway estate. Please see the recent development on Lister Street and Brownings Lane, this development has serious parking issues due to a lack of off street parking. Consequently many of the local roads are used as overflow parking, thus the roads are inaccessible for larger vehicles.

### **Key Issue 1 - Assessment of the local road network and the impact on it from any new development**

The section of the A4135 in Woodmancote between The New Inn Pub and the entrance to the Whiteway estate via Byron Road has several existing problems. Due to the lack of off street parking almost all of the residents of Woodmancote park on the main road. This causes something of a bottleneck. There are often close calls when a large HGV on one side of the road meets another HGV on the other side during this narrowing section of road. Any greater strain put on this already challenging section of road will increase the likelihood of an accident.

Road users travelling along the Uley road (B4066) who want to access the Whiteway estate will likely travel along Rosebery Road, then Somerset Avenue before arriving at the entrance to the Whiteway estate, via Shakespeare Road. Like the stretch of road mentioned above, there is an issue with a lack of off street parking. Due to insufficient off street parking almost all of the residents of Rosebery Road park their vehicles on the street. Anyone who has travelled this route will understand the difficulty in navigating this stretch of road. Often the road is impassable for larger vehicles due to parked vehicles obstructing the road.

In summary the local road network is in poor condition with a number of historic issues, such as a lack of off street parking. The two sections of road listed above form the two main access points to the Whiteway estate and therefore to site PS29. Alternative access to the site via School Road or Downham view is equally unsuitable due to the narrow roads and the large amount of on street

parking. I believe that for the reasons listed above site PS29 is not suitable for any housing development.

#### Key Issue 1 – Wider site suitability.

Site PS29 is Greenfield land. The site has not been built upon previously and is used for agricultural purposes. In marking this section of land as a site for potential development I believe that Stroud District Council are not recognising the concerns of residents as expressed in the Issues and Options paper.

Any development on Greenfield land needs careful consideration, particularly land which is surrounded by an Area of Outstanding Natural Beauty. I would echo all of the concerns raised about site DUR012/DUR013 (now Site PS29) in the Refusal Of Outline Planning Permission letter by the Planning Inspectorate in response to planning ref S.14/0966/OUT. I also echo the concerns that were identified about the Site DUR012/DUR013 (now PS29) in the Appeal decision letter by The Planning Inspectorate, [REDACTED] Decision date: 2 September 2015 in response to planning ref S.14/0966/OUT.

Many residents on the Whiteway estate, and indeed the wider area, frequently use the fields behind Shakespeare Road and School Road for recreation and walking their dogs. The thought of this precious green space being taken away is deeply distressing.

The concerns about the adverse impact of any development on Site DUR012/DUR013 (now Site PS29) is best expressed in the public comments submitted for planning ref S.14/0966/OUT. 162 comments were received, 157 were objections. 97% of all comments were objections; the adverse effects on the local landscape played a major part in their concerns and ultimate rejection of support for planning application S.14/0966/OUT.

Furthermore, Site PS29 has no existing infrastructure and it has poor access points. Any development should also consider its impact on local services and amenities. I strongly believe that the local primary school, Dursley C of E, is not capable of taking in the influx of students from the 80 properties that could be built. I would be interested to know if Stroud District Council has consulted with the school with regard to view on potentially taking on an influx of new students.

#### Key Issue 1 – Summary.

I believe that site PS29 is totally unsuitable for any development for the reasons listed above. The identification of Site PS29 is in direct contradiction to the points identified in Key Issue 1. I am surprised and disappointed that Stroud District Council still considers this section of a land as a potential site for future development given.

‘Key issue 4: Developing strategies to avoid, reduce and mitigate the indirect impacts of development on the natural environment. Your top suggestions for tackling this issue: Protecting greenfield land from unnecessary development; conserving and enhancing open spaces and wildlife habitats.’

#### Key Issue 4 – General comments.

In addition to my earlier points I would simply say that it appears to me that any development on site PS29 would be in direct contradiction to all of the points raised in Key Issue 4. I have not seen any evidence to support the view that building on this plot of land is necessary, or that the impacts on the natural environment can be mitigated.

**Stroud District Local Plan - November 2015 - Site PS29 is outside of the settlement development limits.**

Site PS29 is outside of the settlement development limits as shown in Policies Map 1 of the Stroud District Local Plan November 2015.

“6.9 Preventing the proliferation of development in areas away from existing settlement development limits is important, as they are not generally well located for the facilities and services their users need. In the Stroud countryside, proposals for additional development outside settlement development limits are likely to lead to increased use of the private car as the rural areas are poorly served by other transport modes. Such development would be contrary to national policy. Proposals may be able to address deficiencies in accessibility to services through the provision of new infrastructure. The countryside in some locations may be important to avoid the coalescence of towns and villages and to retain their individual character. These areas should be protected to retain visual and physical separation.” – Stroud District Local Plan November 2015.

From reading the Stroud District Local Plan November 2015 I see little evidence that any development on this site should ever be allowed to go ahead with reference to the exceptions made in CP15.

**Summary of answer in response to question 5.1a**

I remain totally committed to the view that any housing development on site PS29 should be opposed. I understand the need for the development of local housing; however it must not come at any cost. There is overwhelming evidence that Site PS29 is not appropriate for the development of housing.

I have briefly summarised the reasons for my objection for any development on site PS29 below:

- Historic issues presented in planning application S.14/0966/OUT.
- Site PS29 is outside of the settlement development limits.
- Irreversible adverse ecological impact.
- Irreversible change in the rural setting of the town.
- Negative change in long-distance views.
- Contradiction with Key Issues as presented in the Emerging Strategy Paper 2018.
- Removal of much loved and utilised green space.
- Lack of suitable access points to the site.
- Increased pressure on inadequate sewage network.
- Deterioration to the quality of life of the residents of the Whiteway estate.
- Deterioration in road safety due to increased traffic.
- Cars potentially using the Whiteway estate as overflow parking.
- Pressure on local services e.g. primary school and doctor's surgery.

I feel I can speak for the vast majority of residents on the Whiteway estate in saying we are frustrated with the identification of this site for future development. I believe the response to planning ref S.14/0966/OUT to be the most conclusive evidence yet that site PS29 is unsuitable for future development. To quote the planning inspector P R Crystal in his conclusion of the appeal decision:

'I do not consider that further housing in this location would outweigh the adverse impact the development would have on the wider landscape in the vicinity of the appeal site. Together with its effect on the setting of the nearby AONB this would be contrary to relevant development plan policies and objectives in the NPPF and PPG. For the reasons given above and having regard to all other matters, I dismiss the appeal'. –Paul Crysell BSc (Hons) MSc MRTPI - Appeal Ref: APP/C1625/W/15/3007972 – 2<sup>nd</sup> of September 2017.

I believe nothing has changed since this decision, I can see no reason why the respondents to planning ref S.14/0966/OUT will have changed their mind. Many of the objections raised were in regards to the suitability of the plot land for any development. Few of the complaints were in regard to; say the style of the houses proposed or the lack of affordable housing for example. This is backed confirmed by Stroud District Council's Statement of Case letter referring to planning ref S.14/0966/OUT when they said....

"42. There are no doubt benefits associated with the additional housing, including an element of affordable housing. Most of these are benefits associated with any large housing scheme. There is nothing to show that this development is needed on this particular site or currently that it is needed at all. Affordable housing needs are substantial both for Cam/Dursley and the District as a whole. What is put forward is simply what is stated in the Local Plan. It does not add any additional weight in favour of the proposed development. It simply provides the expected overall policy contribution and no more." - Stroud District Council. 22nd May 2015.

"43. Economic benefits associated with construction are incidentals to the main objective of providing additional housing development. They are short term whereas the impact of the development is irreversible." - Stroud District Council. 22 Maynd 2015.

Put simply building houses on Site PS29 is fundamentally a bad idea that is unpopular with vast swathes of local residents. There is no public appetite for development on this plot of land.

Any proposed future development on the site will likely be met with the same objections and will end in the same result, the refusal to allow for any development to go ahead. For local residents the objection process for any new development is frustrating, time consuming and distressing. For the developer the process is costly, time consuming and fruitless.

I truly believe the best long term solution would be for Stroud District Council to permanently remove the site from its list of potential sites for development.

Yours sincerely

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