



12th January 2019

Ref: Stroud District Emerging Plan: Site PS29 and surrounding fields

Dear Stroud District Council

I strongly object to the proposed development site included in the Stroud District's Emerging Local Plan for the land off Shakespeare Road, Dursley (PS29) and surrounding sites (DUR10-DUR14) for the following reasons.

Environmental Impact

The construction of any building on the site will cause the destruction of animals' habitats. I have seen the following animals within the proposed development site: Foxes, Badgers, Rabbits, Moles, Butterflies, Honey Bees, Bumble Bees, Slowworms, Magpies, Herons, Kestrels, Red Kites, and many other garden birds and insects. An extensive environmental survey in 2014-2015 also revealed the presence of Dormice, Great Crested Newts and Greater Horseshoe Bats, all of which are protected species by law. If the development were to go ahead then all of these species would be destroyed or displaced.

The site also boasts a wide variety of plants including trees, wild flowers and a beautiful, diverse, unspoilt hedgerow which runs through the centre of one of the fields. Documents relating to a previous planning application in 2014 indicated that this hedgerow would be broken by a road connecting two parts of the site. The developer said that they are, "*happy to commit to "retention of the existing mature hedgerows and tree belts."*" How can this be true when part of the hedgerow will be torn down, with absolutely no guarantee that any future amendments to the plan would not put it at risk, or that if the development was successful, that any residents would not ensure the preservation of it? Furthermore, according to the Emerging Local Plan, there will be an area of green land created as part of the site. However, this does not mean that that part of the fields will be untouched. It suggests that this part of the site will be re-landscaped, which would further diminish any wildlife that had so far managed to survive the impending development.

There has also been the issue of flooding on the site. During periods of heavy rain the fields become very water-logged. Building on the land will increase the risk of flooding to the gardens and properties of the existing residents of Shakespeare Road because the water will have nowhere to go and will not be absorbed by the grassland. A previous developer's plan also indicated that the area at the bottom of the fields would not have housing on it. The developer put this forward as retaining green space, but the real reason for this is because the base of the trees in this area become submerged in water after heavy rain.

The development of this site will have a negative visual impact on, not only the view from the location itself, but also from the boarding Area of Outstanding Natural Beauty. The site can be viewed from Cam Peak, Cam Long Down and Downham Hill; building on the proposed land will further encroach onto the spectacular, glorious and stunning landscape.

The construction of housing close to the current dwellings in Shakespeare Road, Chaucer Road, School Road, Downham View and Caswell Mews will result in the loss of light to existing gardens. This will negatively affect plant growth and garden habitats.

It is of grave concern that the wording on Emerging Local Plan lists site PS29 and surrounding area as being “High Sensitive” in 2014-15 but “Medium Sensitive” in 2018. Given the points mentioned above and that previous applications have been turned down due to the substantial environmental significance of this site, this error must be corrected with immediate effect and the extensive importance of the area restored and enhanced.

Health

The development site is very close to a chicken farm, located to the other side of Ganzell Lane. Since it has been there the nearby houses have experienced an increase of flies, especially during the summer months. If houses were to be built in the proposed location then the new residents may also experience this.

The increase in air, sound, and light pollution caused during and after the construction of the development will have detrimental effects, not only on the environment, but also on the health of existing residents. There will be an increase in air pollution from the dust created from the building of the dwellings and roads, and the fumes from the construction vehicles and the private cars of the new residents. There will be an increase in noise pollution from the construction of the site and the noise created by residents once they have moved in. There will also be light pollution created by street lights and the properties after construction. This will devastate a quiet, peaceful part of Dursley, which currently allows the stars to be seen on a clear night, the sounds at night to be nothing more than the bustle of night time wildlife and the gentle hum of traffic on Whiteway Hill, and the ability to breathe clean, fresh air created by the untouched greenery of the surrounding area.

In your report from November 2018, Sustainability Appraisal Report for the Stroud District Local Plan Review: Emerging Strategy Paper, in the overview of all the sites, on pages 50 and p111 DUR10-DUR14 and PS29 it indicates that there would be a negative to significant negative effect on air and water quality, and flooding to this site.

In addition to problems of pollution, there will be a negative effect on the physical and mental health of the nearby residents. The field is currently used by people to walk their dogs or who simply just come to walk the fields as part of a local walk. Some of these people live on the existing Whiteway and Highfields estates but also

from other parts of the area. There are also families who use the fields for informal sports activities such as football and “throw and catch”. The health benefits of such activities are obvious; with the obesity epidemic and individuals, especially children, showing Vitamin D deficiency, participation in exercise and outdoor activity has never been more important. Over the years the fields have also been used for leisure activities, such as children’s parties. I fondly remember my 7th birthday, which had a “pirate” theme. We were given a treasure map and went out in groups to locate the “treasure” hidden in the fields. What a tragic shame it would be if future generations of children did not have the opportunity to have similar experiences and build these unforgettable memories because these fields no longer existed.

The development of the site will also impact negatively on the local population’s mental health. The construction site will cause a great deal of stress to the residents who live close by. This would not only be in relation to the uncertainty about the future implications of the construction and the potential new residents, but also because they would have to witness first hand an area they love, cherish and adore being destroyed. These fields are a sanctuary for people to escape the already stressful situations of their daily lives; to be able to go outside and look across at the countryside, and forget their worries, concerns and troubles, if just for a moment, is priceless and will be lost if there was a backdrop of inharmonious housing.

Traffic

The development will result in an increase in the amount of traffic on the nearby roads; Shakespeare Road will bear the brunt most of all. The extra vehicles will also need to use Byron Road to get on to Whiteway Hill and Woodmancote. The other way to leave/get to the proposed site would mean vehicles would use Somerset Avenue and Cambridge Avenue to get on to Woodmancote or they would use Somerset Avenue and Rosebery Road which leads to Uley Road. Shakespeare, Byron and Rosebery Roads, and Somerset and Cambridge Avenues are all estate roads not designed to be used by large volumes of traffic. There are cars which are street parked, either because the households have more than one car, or because they do not have sufficient driveways to park their cars off road. This is particularly the case in Rosebery Road which is barely two cars wide. These estate roads are in a very poor state of repair, where potholes have simply been patched-over or not been dealt with at all. The extra traffic generated by the estate will break up these roads even more meaning that the council will have to invest in road repairs more frequently and put road users at a great inconvenience while repairs are carried out. The traffic from the new estate will also put an additional strain on Silver Street which is already a bottleneck; a further 100-200 vehicles a day will only exasperate the problem. During a previous consultation, the developers released drawings showing the area for development stretching down to Uley Road and beyond. To allow this initial development of 80, but potentially significantly more, houses would open the flood gates to more development, make the potential traffic problems in Dursley even worse, and increase traffic to the winding, twisty, narrow street through Uley.

The level of public transport servicing the new development is also an issue. Despite Shakespeare Road being served by a bus route it is not adequate to access all amenities and locations. There is the 61 bus which goes to Stonehouse, Stroud and

continues to Bussage. This service does not serve the Whiteway and Woodmancote area of the town at 4:30pm (a popular time for bus users to arrive in Dursley from Stroud due to school/ college finish times) during term time (i.e. for 40 weeks of the year), despite a 2014 Transport Assessment Report stating that it is hourly (2.5.1 and 2.5.2). Therefore, residents will not be able to travel to/from the potential development at essential times of the day. The report also suggested using the 61 bus service to access the train station by getting off the bus in Draycott, Cam and walking via Box Road (2.5.4). However this is not always suitable, especially in wet weather or if you have a lot of luggage. The Transport Assessment Report freely points out that "There is no controlled crossing provision to facilitate pedestrians crossing from the bus stop to the footway on the eastern side of the A4135."(2.5.4). I have also experienced difficulty crossing at the end of Box Road because the pavement does not run the entire length of both sides of the junction.

The 65 bus is a two hourly service which comes from Stroud via Nailsworth and Nymbsfield, the closest bus stop to this service from the Shakespeare Road/Ganzell Lane development is a 10 minute walk, making it unsuitable for people with mobility issues to use. This bus service is designed to take passengers to and from Cam & Dursley Rail Station, however does not connect with the all the trains, often the bus is timed to arrive after the train is due to leave. This is particularly true if needing to travel to Bristol. This means having to wait an hour for the next train. The bus service is also very unreliable. This is because the arrival/departure of the bus is within only one minute of the arrival/departure of the train (particularly true if travelling from Bristol to Gloucester). The 2014 Transport Assessment Report point 2.5.9 states that "*Given that services from the south arrive at Cam and Dursley Railway Station at around 14 minutes past each hour, it could involve almost a 30 minute wait for the 207 bus service back to the site.*" From personal experience this has resulted in a 40-minute wait at the train station, on my own, for the next bus. This could pose a potentially unsafe situation for young or vulnerable people. Cam & Dursley station is quite isolated, unmanned and does not have a proper and secure waiting area. There are some instances where there is a gap in the bus service, with no way to get to the train station other than by car. The car parking at the station is inadequate, despite more parking spaces being created recently; many cars have to park on the approach road, creating more congestion.

There is no Sunday service on any bus service serving Shakespeare Road or the potential development. Both the 61 and 65 bus services suffer from frequent breakdowns; three occurring in one week alone; and that was just the buses I happened to be using. I rely on the buses to get to and from work (in Stroud) and also for to access the larger towns and cities in the area, as do many other people. The bus is also used by school and college students, who for them and myself, is their only form of transport. Passengers been very negatively affected by this: one man told me his benefits had been stopped because he missed a meeting at the Job Centre, a young passenger was late for school causing her to miss the start of an exam, a passenger with learning difficulties was very anxious due to being late for his support group and local employees have lost pay due to being late for work. This has resulted in local residents of all ages, backgrounds and disabilities being left stranded in poor weather conditions; in the dark during winter months, either waiting at least an hour for the next bus or relying on car users to take them to their destination. This not only increases pollution and expense to the driver but also creates more traffic congestion.

If more houses were built in this area it is likely that the inadequacies will affect more people.

Other local bus routes are also infrequent, inadequate and in. For example, the number 60 bus from Dursley to Gloucester has been cut from an hourly service to every two hours. It is over a mile from the proposed development site and does not connect with the 61 service to take passengers to and from the town centre. In fact, the 61 service was withdrawn from the Whiteway area of the town between 2015-2016. This could occur again, leaving the existing and potential new residents without any access to public transport at all.

The local plan wishes to promote the availability public transport but realistically it is not sufficient, frequent or reliable enough to be used without having the use of a car as well.

The construction traffic and extra cars from the development will put other road users and pedestrians at risk. The 2014 Transport Assessment report (section 3.3) stated that the recorded traffic speed along Shakespeare Road to be 19.5-21.9 mph. The report also stated that there is a very low accident rate in the area suggesting that *“existing residents drive with due care and attention to their local surroundings, reducing speed where necessitated by road geometry and conditions.”*(3.4.12). However, this does not guarantee that the new residents will drive with the same courtesy or that they will be able to accurately judge the road conditions, particularly because the bends in the roads on the Whiteway estate are steep in places and can be hazardous in extreme weather, to unfamiliar drivers. It is also worth noting that a great number of children, disabled and elderly pedestrians use Shakespeare Road and Somerset Avenue (next to the flats and entrance to Dursley C of E Primary Academy). These are vulnerable road users who are not always able to get out the way of traffic quickly or easily. Despite the developer’s assurances of the low vehicle speeds and low accident rates these people would still be in danger from vehicles such as construction lorries (especially if the driver is not familiar with the area or road network) because they are not always easily seen and there is a very real possibility of an accident or serious injury occurring as a direct result of the proposed building plan.

Access

I have very serious concerns about the proposed access onto the site itself. The entrance to the site will go through the land currently occupied by 47A Shakespeare Road. This is on a bend which poses a hazard to road users. The access road is immediately adjacent to 49 Shakespeare Road, skims the outside of driveway of 47 Shakespeare Road and is directly opposite the driveway of 14 Shakespeare Road. This would cause horrendous disruption to these residents. The position of the junction will also be very dangerous. The 2014 Transport Assessment Report (page 9) stated that Shakespeare Road is 6.2m wide. The entrance to the new estate will be much smaller; the Transport Assessment Report point 5.2.3 stated that *“This design comprises a 5.5m wide carriageway with a 2m footway on the northern side of the new site access road, due to width constraints.”* They are openly admitting that space is limited, too limited to have a pavement on both sides of the proposed access. The limitations and inexcusable distance from neighbouring properties is further acknowledged by point 5.2.5 *“A footway on the northern side of the access road is also considered able to*

benefit from better natural surveillance from properties on Shakespeare Road (not being adjacent to the wall of a nearby building) and to benefit from more effective width than being located on the southern side of Shakespeare Road passing the side elevation of the adjacent property.” The report claims that facilities such as dropped curbs will be put in place but that does not excuse the fact that part of the access point will not have a pavement on one side of the junction. On page 10 of the Transport Assessment Report it states that the policy of the National Planning Policy Framework is to, “*Development should be located and designed where practical to:*

- *Give priority to pedestrian, cycle and public transport facilities;*
- *Create safe and secure layouts; and*
- *Consider the needs of people with disabilities, by all modes of travel.*
- *It is also important that safe and suitable access can be achieved for all people”.*

It is hard to see this can be achieved if pedestrians will have to walk partly in the road and negotiate a road junction, especially if they are elderly, disabled, a wheelchair user, or pushing a pram and accompanying very young children. No other proposed site is accessed via part of an existing housing estate with this particular layout. To do so would pose a hazardous and ever present danger.

The bend is already difficult for large vehicles to negotiate; the bus which uses Shakespeare Road often has to go to the right-hand side of the road to get round (travelling in a north-west direction). The 2014 Transport Assessment report (point 7.10.33) states that, “*Given the current satisfactory operation of these bus services (some of which are understood to use full size buses) satisfactory construction access can be assumed.*” However, the bus travels along the road with the bend going to the left (north-west); it does not attempt to turn from Shakespeare Road into the new access road. It would be very difficult for large HGV lorries to turn into the proposed access road without mounting the pavement the opposite side of the road because those types of vehicles need a large turning circle and the angle of the bend is very tight. This may result in damage to the property, gardens, and vehicles of 14 and 16 Shakespeare Road as they are directly opposite the proposed access point. (Despite the developer’s calculations in the 2014 Transport Assessment that there is sufficient space for large vehicles). The Transport Assessment Report, page 70 point 7.10.28 and table 7.12 states that the two types of HGV that will use the site have turning circles of 6.550m and 10.450m. However, point 7.10.31 states that Shakespeare Road is only 6.2m wide, so how can it be possible for “*...satisfactory construction vehicle access without any detriment to highway safety*”, when the road width and site entrance are not adequate enough to accommodate the HGV’s ability to turn into the junction?

Privacy

The privacy of the residents of Shakespeare Road, Chaucer Road, School Road, Downham View and Caswell Mews with properties adjacent to the proposed site will be lost because the new houses will be overlooking their homes and gardens.

The potential development area also shows that the new houses that are towards the north of the site are directly overlooking Stepping Stones Playgroup. As a qualified Primary School teacher this horrifies me. The noise and dust from the construction

(which would continue for up to 4 years until the estate was complete) would have a negative impact on the children's physical health and hinder all areas of their learning and development. Not only this; the new housing estate creates a potential child protection/safeguarding issue because the builders during the construction, and the residents once they have moved in, would be looking directly onto the playgroup building and outside area used by the children. I am sure all parents and educational practitioners would not want children subjected to this danger.

Employment

There are no employment prospects to the new residents. Dursley is a job blackspot, just in recent years the town has lost Lister Petter, the Gazette newspaper offices, and other major employers in the town. From personal experience I have previously spent a total of 27 months unemployed; I am a qualified person with a university degree. The developer has proposed that the new estate could consist of a large percentage social housing. If I took over two years to find employment then it will be even more of a challenge for people with few academic qualifications and disadvantaged backgrounds to find a job.

If the new residents are already employed this does not necessarily mean they would work in Dursley. This would result in increase car use on surrounding roads and Dursley being used as a commuter town, to an even greater extent than it is already. There would be extra journeys through the centre of Dursley and Uley, as these are the routes to get to Gloucester, Cheltenham, Bristol, Stonehouse, and Stroud, where the majority of the jobs are. As I have mentioned previously, public transport from the site is not always reliable or able to take passengers to their desired destination effectively.

The Littlecombe Development is still in the process of being built and with the recent development at Box Road, potentially at least 1000 homes in total; employment is needed for these residents too. There is simply not enough employment in the area to satisfy the need for an additional 80+ houses, especially in the Whiteway area of the town.

Lack of other local resources

There is also a lack of other resources including capacity of the local schools and patient spaces in doctor's and dentist's practices. A report from Gloucestershire County Council dated 29th May 2014 states that it estimates "... 7 pre-school places, 25 Primary places and 15 Secondary places arise per 100 dwellings." However, when the Littlecombe Development is taken into consideration, Dursley C of E Primary Academy and Rednock School (the feeder schools for both Littlecombe and the land off Shakespeare Road developments) would struggle to cope. The doctor's practice in Dursley is also under strain and would not be able to serve an additional 100 or more patients.

Conclusion

In conclusion the proposed development of the land off Shakespeare Road is unnecessary, unwanted and unsustainable due to: the lack of local resources (school places, health care, and public transport); the lack of employment prospects for new residents; the dangerous accessibility to the site; the increase in traffic to residential roads and Dursley town centre; the loss of privacy to existing residents; the negative impact on the learning development and safety of children; the negative consequences on the physical and mental health of those who use, and are in close proximity of, the site; and the demolition, destruction and devastation of the undeniably beautiful Gloucestershire countryside.”

To let this go ahead would cause irreparable and irreversible consequences forever.

Yours faithfully

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