Planning Strategy Team Stroud District Council Ebley Mill Stroud

Issued electronically to:
@stroud.gov.uk

Chairman of Cotswold View (Dursley) Management Limited



15th January 2019

Dear Sir / Madam,

Emerging Strategy Paper: Objection to proposed development of 'PS29' and DUR010 - 014 and inclusion in the Dursley NDP

I understand that Stroud District Council is currently consulting the public in relation to its Emerging Strategy Paper issued in November 2018 in relation to the Stroud Local Plan. Because of the details listed below regarding the direct effect to our private land and development of 103 houses, the Cotswold View (Dursley) Management Company wishes to lodge a formal complaint and objection to the proposed development of 'PS29' and adjacent land (DUR010-14). We take this opportunity to demonstrate why it should not become part of the Dursley Neighbourhood Development Plan, proposed by the Council's Emerging Strategy Paper.

The reasoning for our Company's objection to construction at the Proposed Site(s) is as follows:

The Cotswold View development was constructed from 2001 - 2004 on the ex Mawdsley factory brown field site off Uley Road (B4066). The proposed sites abut and wrap around the south and eastern boundaries of our development. The main water course of Castle Stream, which emerges in the proposed site, dissects our development, running through seven private house gardens before entering a Mill Pond at the centre of the site within one of the areas of private land owned and managed by the Cotswold View Management company. It then exits at the northern end of the pond via a spillway and underground culvert, until emerging into the river Ewelme adjacent to Uley Road / Eweleme Close. The pond and its structures are engineered and balanced to the tolerances understood by the experts when our development was planned back in 2001. It can be clearly demonstrated that over the last fifteen years the water table level in the whole surrounding area has risen, and surface water runoff has significantly increased.

There are specific documented examples of new springs pertaining to the proposed site that have emerged, causing flooding around and on our development. Excessive water runoff from the escarpment to the south has resulted in constant flooding onto the B4066 Uley Road plus increased capacity of water flowing though our development via the Castle Stream main watercourse.

- a) With the emergence approximately ten years ago of a spring from the side of the old pump house hill on Spring Farm (DUR010-014 stages,) and lack of suitable safe diversion, roads, pavements and homes' foundations on the southern end of Cotswold View development were flooded. Four terraced houses in Caswell Court overlooking the Highfields recreation field had to claim on their NHBC insurance policies as the row's foundation raft experienced a significant shift owing to the ground heave and flood water! One of the end houses was so badly affected it had to be underpinned, totally refurbished over the course of a year - replastered, redecorated, new fixtures, fittings and kitchen, whilst the owner had to be moved out into a rented house. In 2013 the Environment Agency head consultant, Niall Hall, advised Stroud District Council's Water Resources Engineer, David Lessor, to install a swale in the Highfields recreation field adjacent to our development, and channel the spring water into the Castle Stream. This increased the water

and silt volume entering, and then trying to exit the Mill Pond on our development. We are now seeing far higher silt level build up in the pond than we had been previously advised should happen.

- b) As the fields being proposed for development sit on a significantly higher plain than the Cotswold View development, excessive storm and natural subsoil water will end up being forced in the direction of our houses, roads, our storm drains and Mill Pond at the centre of our site. Our privately owned and maintained dam controls the surface water flow into the valley below and any additional demand upon the capabilities of this dam and pond would need careful consideration and investment.
- c) Homeowners and residents all across the development have seen a tremendous increase in the amount of water lying in their plots. Those whose garden boundaries meet the proposed new development fields sometimes during storms experience waves of excess surface water entering their gardens.
- d) On Monday 14th January, I had a very constructive conversation with the same Environment Agency consultant, Niall Hall who designed the swale; he is very knowledgeable about the overall topology of the escarpment / fields in question, the main Castle Stream watercourse flowing through our site and downstream larger river issues (Eweleme and river Cam etc). Any development on this land is indeed a grave cause for concern with a high risk of significant ground water flooding. In the area proposed, even with the required SuDs (Sustainable Drainage System) surveys, it will be difficult to locate all likely spring points, and calculate levels of future water runoff. This would then mean potentially not all future water sources or volumes would be correctly diagnosed resulting in them not being intercepted or diverted safely. He deduces this would cause major issues on adjacent land, homes and watercourses further on.
- e) There is also currently a severe flood situation escalation in progress to Gloucestershire County Highways regional area manager for the main road in front of our development. High volumes of surface water run-off and spring water are emerging from Spring Farm and flooding the B4066 Uley Road, either side of the access roundabout for Cotswold View. The storm drains. catch pit, culvert under the road are all either inadequate or incorrectly sited to deal with the higher levels of water run-off being experienced. The tarmac road surface has broken up across large chunks of the road owing to being constantly submerged in flood water. During two separate occurrences in November 2018, many photographs have been taken capturing the flooding - these have been passed to Highways and copied to Dursley Town Council. The water levels are so high that special road markings on the approach to the roundabout added as an additional safety measure by Highways back in 2015, are being obscured during the floods. There has therefore been an increase in the number of accidents and damage to vehicles again, when the road markings are obscured by water or detritus after a flooding incident. Grit placed down from the council gritting lorries is ineffectual, as it is being washed away by the excess surface water. causing treacherous icy conditions on the Uley Rd and pavements. Local Highways officials so far have failed to address this excessive volume of water issue adequately, hence the escalation.

The Cotswold View Management company shares the same concerns as its residents over other issues surrounding the proposed site redevelopment affects on our town and environment, for example,

- public transport services are woefully inadequate for the whole town, including Cam.
- the local roads are already overcrowded, of inadequate sizes and grades to take the increase in volume of cars expected. The pinch point in Silver Street, the diabolical road junction on the B4066 with Lister Street, and the on street parking issues along Lister Street and Long Street, are already dangerous and a complete bottleneck at that end of town.
- Local schools and doctors surgeries are already at capacity
- there is inadequate parking provision both for visiting and dwell time in Dursley town itself, and also for residents to park their cars near to their properties, especially around the proposed site in question.
- The Proposed Site is not sustainable from a jobs perspective, meaning that most new occupants to the Proposed Site will need to travel farther afield for employment, further compounding

pressures on the local road network given the lacking public transport arrangements and few opportunities for employment locally.

- The Proposed Site sits on the boundary of the Cotswold Area of Outstanding Natural Beauty. It is unacceptable to see green fields being put up for development and the areas habitat and wildlife decimated.
- The earlier planning application appeal by the developer was dismissed by the Secretary of State on multiple grounds, so why is Stroud council even contemplating starting this process all over again.

Towards the end of 2018, the local electorate was asked to vote on 'Stroud District Council's 'Dursley Neighbourhood Development Plan'. There was absolutely no mention of the development of the Proposed Site within that plan which was a material consideration in their replies for residents of the town and members of the Cotswold View development. We are frankly appalled that, just a mere few weeks later, Stroud District Council is consulting on yet another substantial planning document of circa 120 pages which counters that to which public approval was sought. This is bureaucratic, lacking in transparency, and could be described as underhand and misleading. With regret, The Cotswold View Management company feels completely mislead by the manner in which these activities have been managed and concerned by the Council's intentions for development in the Cam and Dursley area. Because of the inevitable ripple effect of the proposals to our private land, unique structures and development of 103 houses, the Cotswold View (Dursley) Management Company wishes to vehemently object to proposed development of 'PS29' and adjacent land (DUR010-14). It should not become part of the Dursley Neighbourhood Development Plan, proposed by SDC's Emerging Strategy Paper.

Please confirm receipt of this letter in writing and register the Cotswold View (Dursley)
Management Ltd company as an interested party that wishes to be kept informed by the Council of any progression in relation to the Emerging Strategy Paper and the Dursley NDP / Local Plan.

Yours faithfully

Chairman and all Directors of Cotswold View (Durlsley) management Limited