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[Redacted]

Head of Planning Strategy
Stroud District Council
Ebley Mill
Stroud
8th January 2019

Stroud District Council

10 JAN 2019

Dear [Redacted]

I enclose a copy of my submission to the Emerging Local Plan, in particular the area PS29 at Dursley.

I thought you may appreciate your own printed copy.

Yours Faithfully

[Redacted]

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THE CASE AGAINST DEVELOPMENT ON SITE PS29 AND ADJOINING FIELDS

1 The area has been defined as 'green infrastructure' in the Dursley Neighbourhood Plan (NDP). This should be enough to prevent any development on this land. It won't be green if it is built upon. **Indeed, Stroud District Council has signed up to something called the "Gloucestershire Green Infrastructure Pledge"!**

Indeed, in 2014, when this area was under a planning application S.14/0966/OUT, Nick Boles MP, Minister for Planning, underlined the fact that neighbourhood plans have statutory force and are effective in their own right. He stated, "I am going to make sure that neighbourhood plans are abided by" (ref. letter from the then MP for Stroud, Neil Carmichael, to myself and others)

2. Many planning applications on the same land have failed, including those in 1991, 1993, 1997 and others, the most recent being in 2014 which was turned down on appeal (appeal ref APP/C1625/W/15/3007972) and I quote from para 24, "I do not consider there is a compelling case for supporting the proposal because the benefits, in my view, would not outweigh the adverse impact on the setting of the AONB and the harm that would result from the development"

3. So what is this harm?

The land has consistently been classed as "High Sensitivity" due to its setting and residents' objections. Yet, in the Emerging Local Plan, it appears to have been downgraded to "Medium Sensitivity". **This is an error and should be corrected immediately. (ref 2017 Site Assessment for DUR013)**

The area under threat is valued highly by residents from a wider area than just the Whiteway Estate, receiving 100's of visits a week. This loss of amenity would cause great harm both mentally and physically, walkers have gone unchallenged for decades. The leaving of an open space would merely shoehorn visitors into one space.

European protected species – Great Crested Newt, Dormice and Greater Horseshoe bat were found on the site during, extensive wildlife surveys, for the 2014/15 planning application. Ongoing bird surveys over many years have also shown the site holds important species such as migratory redstart, spotted flycatcher and whitethroat. Red Kites are seen regularly over the site. All these records are logged with the Gloucestershire Centre for Environmental Records (GCER), who should be consulted.

Anyone doubting what an outstanding area of beauty this site is should visit it in April and May.

Traffic increase is of a major concern for all residents. Shakespeare Rd, Byron Rd, Somerset Avenue, Cambridge Avenue and Roseberry Rd and the A4135 at Woodmancote would see the brunt of it FOR EVER, as well as increases in Uley and Dursley town centre. The detrimental effect to the residents who live right in the mouth of the proposed new entrance to the development, formed by demolishing a modern house, 47A Shakespeare Rd, would be unbearable to them. Construction traffic daily for 3-4 years and then domestic traffic and service vehicles for ever. And if further extensions to the site are approved, construction traffic for many years following. During the 2014 application a local estate agent said for those living around the entrance their houses would be unsaleable during the construction period.

I cannot think of any other new development of this nature leading off an existing estate in Dursley or Cam, and I have seen every major development since the 1950's.

4 Public Transport

This is NOT good. An hourly service, the 61, currently runs from the Whiteway Estate to Stroud via Dursley town centre. It suffers frequent breakdowns (3 in one week, for example, and that were just the ones brought to my attention), it continues to Bussage after Stroud which means it returns late, frequently, particularly during the rush hour times and noticeably on a Friday evening when it is usually 15 mins late arriving in Dursley and often later. As I write this the 1736 has just gone past my house at 1833, 57 minutes late. (evidenced also by Stagecoach Live Feed)

There is no longer a bus to Cam and Dursley Rail Station from Whiteway Estate.

There is a bus to Gloucester, but this only runs from Dursley Bus Station, 1.1 miles away by foot and has been reduced to every 2 hours

Saying that the presence of any sort of service is a good reason to build here is a nonsense as during S.14/0966/OUT surveys commissioned by the developer and undertaken by WSP, stated that from a development of 100 homes only 1 person a day would be expected to use the bus service during peak. Hardly a compelling commercial reason for Stagecoach to increase the service. Evidence S.14/0966 Transport Assessment Part 1, extract below.

	AM Peak Forecast Trips	PM Peak Forecast Trips
Driving a Car or Van 74%	47	51
On Foot 13%	8	10
Passenger in a Car or Van 6%	4	4
Bus, Minibus or Coach 2%	1	1
Bicycle 2%	1	1
Train 2%	1	1
Motorcycle, Scooter or Moped 1%	1	1
Total 100%	63	69

Note: Method of Travel to Work statistics accessed from Neighbourhood Statistics website on 23 December (presumed 2013)

In fact one could not guarantee there would be a bus service 61 at all, it was withdrawn completely by Stagecoach for a while sometime after 2015, due to lack of use they said.

5 Misleading Documents

As well as missing that the site actually has a **High Sensitivity** rating, there are several other inconsistent statements.

There is inconsistency in the land reference numbers and number of dwellings in the documents we are asked to consider:-

DURA (including Dur010,11,12,13) – 80 homes, DUR13 – 60 homes, SP29 – 80 homes, 2016 “Call for Sites” ref117 – 100 homes. They are all the same land parcel!

When you view the recent assessment for “Land at Spring Farm” which can be found on the Dursley Town Council website, it is the same area as for the above references and gives 334 homes. This can be cross referenced with the plan from 1997 which wanted 350 homes.

When you look at the 2016 “Call For Sites” ref 117 in that document, NO has been ticked for several categories, yet in the S.14/0966 assessments the following problems were found which would change the NO’s to YES: **contamination** (from the scrap yard), **large mains water pipe across**, **easements including demolition of 47A** (that alone would add around £4000 to the cost of each home, based on 80 homes, value of compensation to owners of 47A and retainers), **Heritage/Landscape/Wildlife** as already discussed.

6. SEWAGE

There was also a problem with SEWAGE. The developers plan in the 2014 application was to store it in a corner of the new estate and then pump it UPHILL to the **defective sewer** in Shakespeare Rd. Blockages here have caused backups flooding properties. Can you imagine the effect of more sewage being pumped into it at the same time? Severn Trent raised concerns about this. If this development goes ahead it should be a condition that the sewage system is self-contained within the new estate and allowed to fall with gravity to Uley Rd

7 Alternative Sites for Housing Linked To Employment

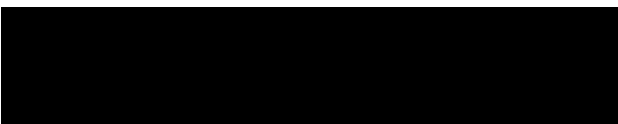
The 1000 new jobs promised at Littlecombe have failed to materialise.

Promoters of new housing at Dursley must realise that, apart from a few infill sites, capacity has been reached and growth must be concentrated to minimise commuter travel.

For example, by the late 2020’s a new power station is planned to be open at Oldbury creating 850 permanent jobs. This lends itself for housing growth at Stone, Newport and the Vale.

8 CONCLUSION

It is clear that those who are promoting this site eventually will want around 334 homes if they get a foot in the door with PS29 and the site should be **WITHDRAWN** from the emerging plan.



History of Housing Development Proposals, Land East of Shakespeare road, Dursley, during my time of residency here. (updated and corrected version 6/1/19)

1991 – District planners, residents and Councillors fought off property developers.

1993 – Developers tried to get local structure plan altered to get this land included for housing. This was also turned down by SDC.

1997 – SDC promoted 350 dwellings for this site. Defeated by a vigorous campaign and a proposal from a district councillor to develop the redundant factory sites.

2014 – In planning application S.14/0966/OUT developers proposed over 100 dwellings on part of the area, from Ganzell Lane, behind Shakespeare Rd and off School Rd.

Fought off by a vigorous campaign and rejected unanimously by SDC planning committee. There were 200 objections and no letters of support, not even from local businesses who might have seen a slight increase in trade, thus showing they really care about their local environment, not just a potential profit.

2015 – Site rejected again by a government inspector following an appeal by the developers, mainly on landscape setting. Quote “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.” Appeal ref APP/C1625/W/15/3007972

2016 – Within months of the rejected appeal the developers submit the area again for ‘call for sites’ and ignore the constraints flagged during S.14/0966/OUT by ticking NO to many of the questions on the form.

2018 – During the 2014 application the Stroud MP at the time, Neil Carmichael, obtained a statement from the then housing minister, Nick Boles who underlined that neighbourhood plans have a statutory force and are effective in their own right. In November 2018 the Dursley Neighbourhood Plan was approved at a referendum and defines the area PS29 as “green infrastructure”. If it is built upon it will no longer be green. Developers cannot go against the NDP! So this alone should be reason for removal from the Emerging SDC Local plan.

2018/19 – SDC ask for comments on the Emerging Strategy including an area called PS29, land east of Shakespeare Rd. It appears SDC are actively promoting the site as its their “preferred strategy”. PS29 we are told is for 80 homes, but when you consider the map shown on page 73 of “SDC local Plan Review Emerging Strategy Paper Nov 2018”, it clearly shows the extent of the plans to carry on down to Uley Rd to the north east and beyond Castle Stream farm to the east. The conclusion must be that we are then back to the original plan from 1997 and we may eventually get 350 houses!

It is also noted the inconsistency in the land reference numbers and number of dwellings in the documents we are asked to consider:-

DURA (including Dur010,11,12,13) – 80 homes, DUR13 – 60 homes, PS29 – 80 homes, site 117 – 100 homes, they are all the same land parcel!

What is also worrying is that there is an assessment contained in the following link which refers to "Land at Spring Farm". This is the same area as above, and refers to 334 homes, which brings us full circle to the 1997 plan.

<https://www.dursleytowncouncil.gov.uk/documents.html>

