

Application S.13/1893/FUL

Woodchester Parish Council has considered this application and wish to object to the proposed development on the following grounds:

1. Highways.
2. Parking.
3. Ecology and Habitats
4. Overdevelopment.
5. Design.
6. Flooding.
7. Employment & Commercial Use.
8. Impact on the character of Rooksmoor and Woodchester.

In submitting these objections Woodchester Parish Council has had particular regard to:

- Stroud District Council's Local Plan.
- The Woodchester Design statement.
- The National Policy Planning Framework
- The views of local residents as expressed at a recent meeting of the Planning committee of Woodchester Parish Council (minutes of meeting attached).

1 Highways

The A46 is a very busy road and the proposed access points do not appear adequate to serve the increased traffic movements arising from this application.

The application for the provision of 59 units will create a large volume of additional traffic accessing the A46.

Pedestrian access is of concern as the pavement along this stretch of the A46 is narrow. The proposal to move the bus stop back to its original location further south is also a concern as we believe that one reason it was moved to its current location was due to it being on a bend with poor sight lines.

The Road Safety and Mobility Audit carried out in July 2013 states in 1.11, 'both traffic survey locations show 85th percentile speeds exceeding the signed 40mph limit. The increased traffic movements from such a large number of units can only increase the likelihood of accidents occurring.

Woodchester Design Statement

5.3 'Their dislikes (residents) were principally three;.....third, the excessive speed of traffic on the A46'.

Stroud District Council's Local Plan

POLICY GE5

Permission will not be granted for any development that would be likely to be detrimental to the highway safety of any user of any highway or public right of way.

POLICY BE1

New development will be permitted where: 1. it is physically integrated with its surroundings by preserving, extending and improving links with the existing public highway

that provides safe, convenient and attractive through routes.

2 Parking

Most households have two cars. The proposal does not allow for this and unlike a residential estate development, this development will have no on-street parking facility. We are concerned that insufficient parking bays would mean additional cars would be parked up Rooksmoor Hill which is very narrow or on the A46 causing a hazard to motorists and pedestrians.

Woodchester Design Statement

Guidance Policy K states, '... Future development has to incorporate parking and consideration for the distinctive character of the buildings. This is important given the narrow roads within the Parish.'

NPPF

35 – 'Developments should be located and designed where practical to.... create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones.'

3 Ecology and habitats

There appears to be no current ecology report. It is known that many protected species are within this area and need protection. Wildlife such as kingfishers, dippers, otters, crayfish and herons are regularly seen through this stretch of the Nailsworth Stream and this development could have a detrimental effect on that wildlife corridor (Village Design Statement para. 3.3). Tawny owls and bats are also believed to have their habitats in and around the site.

Much of the development is on a 'Brownfield site'. We are concerned that Greenfield land has been incorporated.

There also appears to be no scheme of landscaping in the proposal.

Woodchester Design Statement

3.6 'Policy Guidance Justification 4. Resulting from the questionnaire village opinion suggests that there should be a guideline for the protection and enhancement of open spaces and encouragement for creating wildlife habitats. 76% of respondents rate open spaces very important for bio-diversity and wildlife'.

3.8 - 'In order to maintain the setting of the parish as a whole , special account has to be taken of the enhancement and preservation of open spaces, woodlands , wetlands and wildlife corridors that separate these different areas of the parish and provide its very special character'.

Stroud District Council's Local Plan

The site has been identified as a 'Key Wildlife Site'.

POLICY NE5

'In considering proposals for development, the protection or enhancement of wildlife corridors will be sought. It is important that the function of any corridor should not be harmed. The creation of new wildlife corridors will be supported in appropriate locations. The details of any necessary enhancing, mitigating or compensatory measures should

accompany the development proposal.'

POLICY NE13

'New development will only be permitted where high quality landscaping (hard and soft, built and natural) appropriate to the area is proposed.'

NPPE

109. 'The planning system should contribute to and enhance the natural and local environment by....minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.'

4 Overdevelopment

The site is considered too small and inappropriate for the scale of building proposed. The development is very near to the A46 and the units would be better sited away from the road so as to allow for a wider and safer footpath.

Stroud District Council's Local Plan

POLICY HN8

'Within settlement boundaries permission will be granted for residential development or redevelopment, provided all the following criteria are met: 2. the density proposed is at as high a level as is acceptable in townscape and amenity terms.'

5 Design

This is not considered appropriate to the historic area of Rooksmoor.

The height of the buildings, particularly Block B (directly opposite Rooksmoor Hill) will be very visible for residents of Rooksmoor.

It also concerns us that there is no allowance for affordable housing.

Woodchester Design Statement

8.1 'Development of closely packed modern seventies style housing in North Woodchester is a bit monotonous so there is a need to develop sites like Rooksmoor Mills or Station Road in a style that respects the industrial/mill dwellings found elsewhere in the Stroud valleys'.

4.10 'Policy Guidance Justification 6. Resulting from the questionnaire village opinion suggests that it is important that any new building is in keeping with the environment and local architecture so as to ensure the balance of scale, open space and quality of design.

5.5 '80% of respondents felt that buildings should be in keeping with the environment and local architecture'

Stroud District Council's Local Plan

POLICY HN8 – 'Within settlement boundaries permission will be granted for residential development or redevelopment, provided all the following criteria are met: 6. any natural or built features on the site and worthy of retention have been incorporated into the scheme.'

POLICY BE1 – 'New development will be permitted where: 2. existing features which contribute to the area, landmark features, and views to them are retained in an appropriate manner or improved.'

7.3.20. 'Roofscape and Skyline - The shape, scale, heights, variety of construction, and

orientation of buildings all contribute to producing a pleasing rhythm and generally harmonious skyline across the District. The skylines are dominated by domestic buildings, with punctuations normally formed by key buildings such as church spires, old mills and their chimneys, and other public buildings. Views over roofscapes are very common in the District due to its topography and this pattern should be respected, and new skyline features incorporated that **contribute to this character.**'

7.3.26. 'The Council wishes to see it demonstrated that new development can be well designed, and can be made to fit in with the existing built form. Equally, where no strong tradition of built form exists, it wishes to encourage imaginative and innovative design, rather than the use of standard building types. In areas where a design tradition exists, the proposed new development will have to be of an exceptionally high standard to justify moving away from that tradition.'

NPPF

56. 'The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.'

58. 'Planning policies and decisions should aim to ensure that developments are visually attractive as a result of good architecture and appropriate landscaping.'

61. 'Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.'

64. 'Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.'

66. 'Applicants will be expected to work closely with those directly affected by their proposals to **evolve designs that take account of the views of the community.** Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably.'

130. 'Where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision.'

6 Flooding

This is an area that could flood and has the stream underground. We have not seen sufficient evidence of alleviation schemes and on-going management of the waterways.

There are very few places along this river where the river goes underground and where it does, the channels are old. It will be important that these channels are maintained to prevent flooding on the A46.

NPPF

100. 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.'

102. 'If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower

probability of flooding, the Exception Test can be applied if appropriate. For the Exception Test to be passed.....a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.'

7 Employment and commercial use

This has to be part of the built scheme and not merely a proposal.

Stage 3 is the development of business premises where employment would be created, but developers could stop at Phase 2. Not only would this mean no additional business premises, but also local businesses already present on the site are due to be demolished. The northern entrance could also be delayed. We would ask that if the application is granted permission in some form that the new northern entrance be part of Phase 2 and not left until phase 3. One resident had been told by the developer that there would be ample parking in Phases 2 and 3, but these may be delayed or never completed.

Woodchester Design Statement

2.2 Policy Guidance Justification 1 'Village opinion suggests that to maintain the economic character of the village local employment and homeworking should be encouraged'.

6.6 'The use of existing industrial and commercial buildings should be retained to provide local employment and services. Whilst dilapidated commercial properties may be capable of being converted to residential, there should be a presumption in favour of the retention for commercial use'.

NPPF

136. 'Local planning authorities should not permit loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.'

8 Impact on the character of Rooksmoor and Woodchester

The design of the buildings is felt to be very modern and a significant contrast to the character of Woodchester. The site lies within an Industrial Heritage Conservation Area and yet the development does not give any reference back to the heritage of the site. It does not blend in with the architecture of the local area.

The colour of proposed materials is starkly different from local buildings and does not fit with the many historic buildings very close by.

No consideration had been taken of lighting which the developers will want to introduce. This could have a detrimental effect on Rooksmoor in terms of light pollution.

The Cotswold Conservation Board in their report state that there needs to be a better assessment of the landscape at the border of an AONB.

Woodchester Design Statement

Opening paragraph states, 'It (the Design Statement) seeks to inspire future development that can **respect** and enhance the unique character of Woodchester'.

1.11 "Woodchester is a product of its history and industry and this is reflected in its layout, architecture and landscape. The high quality of the workmanship of traditional buildings is no accident and I think this has to be acknowledged when any proposals are put forward for further developments or extensions to existing buildings to avoid damaging this visual and

skills heritage." Quote from the questionnaire.'

3.7 'In considering the Parish as a whole it has to be remembered that Rooksmoor lying to the east of the A46 is very much a hamlet in its own right with a predominance of older houses within a fairly tight community'

Guidance Policy H states, 'The relationship of buildings to the countryside on the fringes of these settlements is highly sensitive to change. Small incremental changes can cumulatively have a significant impact on character and need to be carefully considered.'

Guidance Policy D states, 'Throughout the Parish materials used range from natural stone to brick to rendered concrete. Setting is all important and in order not to lose the character of the area it is suggested that materials used should complement and reflect the surroundings.'

Stroud District Council's Local Plan

POLICY HN8 – 'Within settlement boundaries permission will be granted for residential development or redevelopment, provided all the following criteria are met: 1. the proposed housing is of a scale, layout and design compatible with the part of the settlement in which it would be located, and would not cause harm to the character and appearance of that part of the settlement.'

7.4.4. 'Section 72 of the PLBCA Act requires that special attention be paid in the exercise of planning functions to the desirability of preserving or enhancing the character or appearance of a Conservation Area. Paragraph 4.14 of PPG15 makes it clear that this special attention extends to the consideration of development proposals which are outside a Conservation Area, but which affect its setting.'

7.4.9. 'Stroud District Council has, for many years, appreciated the need to conserve the best of the District's historic areas, and many Conservation Areas have already been designated. These vary from the historic hearts of many of the District's towns and villages, to areas designated primarily for the character of their **industrial heritage**, which is particularly rich within Stroud District. When considering proposals within, or that affect the setting of any of these areas, regard should always be had to the established character and appearance of that particular area. Stroud's Conservation Areas are very varied in their character, and a solution which may be appropriate in one Conservation Area will not necessarily be appropriate or acceptable in another. Regard should always be had to an adopted CAS where this exists, but in areas where a CAS has yet to be finalized, it is still vital to establish the nature of the character and appearance of the area, and to seek to preserve or enhance that identified character or appearance.'

NPPF

58 'Planning policies and decisions should aim to ensure that developments: respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation'.

59. 'Local planning authorities should consider using design codes where they could help deliver high quality outcomes. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.'

60 'Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through

unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.'

125. 'By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.'

126. 'Local planning authorities should take into account the desirability of new development making a positive contribution to local character and distinctiveness and opportunities to draw on the contribution made by the historic environment to the character of a place.'

The Parish Council are not opposed to development on this site. In our Village Design Statement one of the characteristics which residents stated they disliked were 'dilapidated industrial areas' (5.3). The site in question lies within an Industrial Heritage Conservation Area and yet nothing of the character of the site is incorporated into the proposals. The initial page of our Design Statement states, 'It (the VDS) seeks to inspire future development that can respect and enhance the unique character of Woodchester.' The Parish Council do not feel that this application respects or will enhance the character of our village.