

The following is a combined objection statement to be read out at the planning committee meeting scheduled for 8<sup>th</sup> July 2020 relating to 19/02005/FUL | Erection of dwelling house and associated ancillary development (revised scheme) | Land To The Rear Of Albion Street Albion Street Stratton Gloucestershire.

The statement has been gathered and prepared by Edward Wilkinson and I (Julian Tucker) have assisted with adding policy reference edits and the final email transmission.

It represents a joint statement on behalf of, in the agreement with, the following residents directly affected by the proposed application site:

Edward & Yvonne Wilkinson, 25 Albion Street

Julian & Clair Tucker, 11 Albion Street

Terrance Wright, 29 Albion Street

Rachel Vincent, 4 Stratton Place.

448 words from this point:

1. **Two SSE high voltage power distribution cables** go directly over the proposed dwelling at what appears to be just under ridge height. This is not shown in any of the application or agenda item documents. Apparently SSE does not allow new building under its distribution assets without agreed voltage dependent clearances and requires a diversion strategy to have been agreed with the LPA and applicant early in the planning process. If this has not happened, should consideration of this application be halted until an agreed diversion strategy is documented and agreed?

2. The site **access** was deemed unsatisfactory by Gloucestershire Highways in their responses to the previous refused application and appeal. Access cannot be altered. The Inspector stated "as this is an existing access" in his determination: historically, it has never been used as a vehicular access serving a dwelling.

The committee should be mindful that SINCE the appeal decision (22 Oct 2018), the new revised NPPF Feb 2019 sets out regarding access:

1. "give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas" (Paragraph 110(a)).

2. "allow for the efficient delivery of goods, and access by service and emergency vehicles" (Paragraph 110(d)).

From the SIB the committee should have seen the access at the Albion Street end is substantially wider, with the track narrowing half way along towards the proposed dwelling. It is conceivable that a delivery van would travel down this track and either decide to reverse (dangerous) or continue and be in trouble with the turning circle. Note the turning circle drawing is based on a small family car, not a long wheel base van.

To approve this application would be to sanction an demonstrably unsafe access track with Albion Street.

3. Note the SIB was carried out with the trees around the site in full leaf. During half of the year there are no leaves, so no natural screening of sight lines with surrounding dwellings.

4. The proposed dwelling is surrounded on all sides by existing dwellings creating an **unacceptable loss of privacy** to the existing dwellings and a loss of private amenity space for the occupants of the new dwelling. This makes the site inherently unsuitable for residential development similar to refused application 15/02891/FUL.

5. The proposed dwelling drawings show the dwelling at 22m from 4 Stratton Place and 20.1m from 7 Albion Street. Local plan page 215 states "Where the distance between facing windows is less than 28m in one and two storey dwellings, or less than 32m for buildings higher than two storeys, permitted development rights may be removed". These conditions are met in this application and the development rights should therefore be removed?

**Avening Parish Council – Criteria for rejection of planning application 19/04221/FUL** | Proposed affordable housing development comprising 9 affordable dwellings and 5 shared ownership dwellings, together with associated access road, landscaping, and parking | Land Parcel At The Sunground Avening Gloucestershire. – which replaces:

14/02675/FUL | Erection of 6 affordable dwellings and 5 private dwellings together with access road, parking and landscaping | Land Parcel at The Sunground Avening Gloucestershire.

The Parish Council is very concerned about the cumulative impacts on the community should the above application be approved.

General:

- It appears that Sunground site has been designated as an 'exception site', presumably under Policy H3 of the CDC Local Plan 2011 to 2031 which was adopted in 2018. However the PC can find no record of having been consulted on this designation and accordingly has lodged a freedom of information request (Reference: 18059492) to GCC to request documentation of the process undertaken and evidence provided when designating the site as an 'exception site', thus allowing planning to be granted. This may result in a legal challenge to the validity of the original planning approval. **We request that this application is not progressed until this process is complete** – the SLA for a response is 13<sup>th</sup> July.
- GCC designated the land an 'exception site' enabling it to obtain planning permission for 11 dwellings (now increased to 14 dwellings) via Gloucestershire Rural Housing Association with the application submitted to CDC for approval. There has been no independent review of this application, and while we are not suggesting any impropriety by any person or agency it would not stand up to external scrutiny should there be a review or challenge.
- The CDC Local Plan identifies a number of Principal Settlements as suitable for development. Avening is not one of these and therefore any development in Avening is covered by Policy DS3. It is not clear to the PC that the Sunground development meets the criteria set down under policy DS3. Nor in fact does the concurrent development at The Quarries. In both instances we would have expected a Rural housing pro-forma form to have been completed (with input from the PC) demonstrating housing need and demographic balance. There is no evidence that this form has been completed or submitted for either development.
- The application should be considered in context with the other significant development nearby at Old Quarries – this approved application adds a further 14 dwellings. The cumulative total of all approved applications for new properties over the last 5 years is 50 which represents a 10% increase in the size of Avening despite the village being categorised as 'unsustainable'.
- We will receive no CIL payments for any of these developments, so the village infrastructure such as the school, playgroup and playing field will not be improved as a result. As an example of the 'stretched' infrastructure in the village CDC will no doubt be aware that they have refused to issue new Green Waste licences to recently completed developments within Avening as apparently "the service is at maximum capacity" – this seems incompatible with approving 28 additional residential units.

Justification:

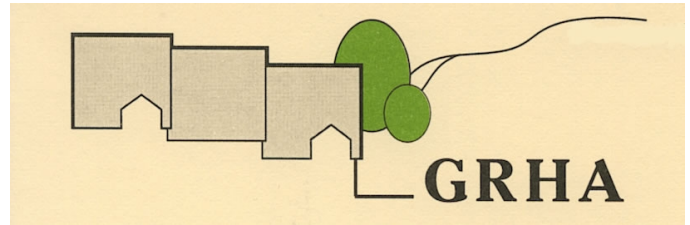
- It seems the justification for the development references a village Housing Needs Survey from 2014. This survey had several factual errors: for example, it described Avening as five miles from Cirencester (it is twelve) and eleven from Cheltenham (it is 21). It listed services no longer available to the village (e.g. the mobile library) and in any event the world has changed significantly since then. Evidence exists that affordable/housing association properties are currently empty in Avening, and other properties have been allocated to families who have been relocated from Gloucester/ Cheltenham – not prima facie evidence of an unfilled local housing need. One such family had to be moved back out of Avening because of the lack of local amenities and public transport. This development will only increase the number of occasions that relocated rather than local families rather than local families are moved into the properties. The difficulties faced by families reliant on public transport, demonstrate that cars are essential when living here, for which the proposed development plan makes insufficient provision.
- These new exception site dwellings by law should only be offered to families within the village or who have a connection to it. Given the above we do not believe there is such a demand locally, and the properties will be filled by ‘outsiders’ who may not find village life suitable or accessible.
- Avening has been designated as ‘unsustainable’ by GCC due to lack of amenities and does not form part of the housing master plan – without the proof of a local need, the Exception status is voided.
- It is incumbent upon CDC and their developer to demonstrate that there is a local need for additional housing of this nature.

#### Traffic & cars:

- In our view parking provision is insufficient, especially that only 2 spaces are available for visitors of 14 dwellings. There is already a parking issue in the immediate area as evidenced by multiple complaints to the PC, some of which have involved the police.
- Public transport is minimal, and not suitable for any form of commuting to Gloucester, Cheltenham or Bristol. There are very few employment opportunities in Avening, so most workers would need vehicles to get to their place of work or will need a van in addition if they are a trades person.
- The dustcart movement survey in the original application has not been updated with the new layout. This survey assumes there are no parked vehicles outside of designated bays, nor on the approach roads – this is not the case at the usual collection times.
- We asked the local fire chief to assess the road during the evening when parking is at its peak – the fire truck was able to get through with care, but in an emergency he said there would be a high probability of damage to parked cars.
- We are also extremely concerned for the safety of children, parents, and workers at the playgroup. The entrance is shared with this site and during the construction phase plant and machinery will be manoeuvring while children are entering and exiting the building. Once construction is complete the entrance will still have a significantly increased risk factor.

#### Scale and quality:

- In our objection submission we highlighted both the density and quality of housing being provided – these concerns were dismissed, but neither are conducive to the conservation area setting nor the overall aesthetic of Avening.
- Sunground already has approximately 80 affordable or social housing units and this development would increase that by 18%. As highlighted above, there is no local housing need to justify this increase.
- The Sunground development is being proposed concurrently with the already approved development at The Old Quarries (19/01692/FUL) – but the cumulative impact of these developments does not appear to have been considered. In total these developments will add 28 residential units and approximately 69 additional residents (assuming 2.45 new residents per unit – the Avening and Gloucestershire average). This represents a 7% increase in residents with absolutely no contribution to improved infrastructure, transport or village sustainability.
- The construction impact of the concurrent development of two major housing projects has not been considered. Access to both developments will be along roads which are single-carriage, with no pavements – and are walking routes to the school for families with children. Approving both these plans concurrently would be reckless and unsafe – even approving one of the two gives us serious concerns.



Date 30<sup>th</sup> June 2020

Andrew Moody  
Cotswold District Council  
Trinity Road  
Cirencester  
GL7 1PX

Dear Andrew

### **19/04221/FUL - PLANNING STATEMENT FOR SUNGROUND AVENING**

The proposal at the Sunground, Avening, includes 14 affordable homes (9 homes for social rent and 5 shared ownership) which will be owned and managed by Gloucestershire Rural Housing Association (GRHA). The site has an existing planning consent reference 14/02675/FUL which included 11 homes being a mix of market and affordable housing. The purpose of this new application is to deliver 100% affordable housing with property types as identified in the Housing Need Survey 2014 and recent housing need data provided by the Housing Enabling Team at Cotswold District Council. The homes will be available for rent and sale (shared ownership basis) to the Local Community with a connection to Avening and this is defined within a legal arrangement (Section 106 Agreement).

The internal floor area of the homes exceed the original planning application and comply with the Nationally Described Space Standards as set out in the Council's Local Plan.

The tenure on this development is going to provide social rent homes where rents are linked to local incomes, making these the most affordable homes and are significantly lower than private rents.

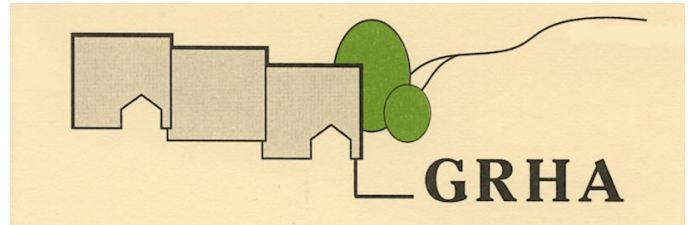
The design, materials & finish of the proposal broadly look to replicate the existing consented scheme and have been developed by the Architects alongside Cotswolds District Council's Conservation Officer. The Architects have worked closely with the Conservation Officer and obtained approval to ensure that the proposed application meets the requirement of section 2 of the Heritage Statement and Cotswold Design Guide.

The proposed parking provision has been calculated in accordance with the Cotswold District Council - Parking Standards Review - Parking Guidance Note 18 April 2016. The proposal allows for parking provision in excess of the Parking Standard Review.

The sensitivity of the neighbourhood is a key concern specifically when considering access to the site. Every consideration will be undertaken to ensure the lowest negative impact to the surrounding neighbourhood.

In March 2014, with the support of Avening Parish Council, GRCC's Rural Housing Enabler undertook an independent survey of housing needs in Avening Parish. The survey identified 14 households with an additional 12 individual's responded saying someone from their family had moved away from Avening in the last 5 years due to difficulty finding an affordable home locally. This clearly demonstrates a high need for affordable housing for local residents which the proposal at Sunground hopes to alleviate.

**Gloucestershire Rural Housing Association**  
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Furthermore, according to Cotswold District Council there were 80 affordable dwellings in Avening Parish (at the time of the survey in 2014). No affordable housing has been built in Avening following the Housing Need survey dated 2014 which clearly identified local people in housing need.

GRHA will promote the affordable homes to local people working together with the Parish Council.

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