



STOW-ON-THE-WOLD TOWN COUNCIL

STOW YOUTH CENTRE
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Philippa Lowe
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18 June 2013

Dear Philippa

Re:- Bovis Planning Application Reference 13/01856/OUT

We believe that the Bovis application is disproportionate to the housing needs of our community. This is evidenced by the fact that in its present, slightly reduced form, it alone exceeds Cotswold District Council's view of the number of houses needed in Stow for the entire period to 2031.

We will be putting forward a number of reasoned objections to the application in due course but feel compelled to write now to draw attention to a number of faults in the supporting documents which, if they are not corrected, will leave the public and those who have to comment on or are considering this application with a false impression of its impact on the community and the local infrastructure.

Considering the magnitude of the outline planning application by Bovis to build 146 houses in Stow on the Wold and the severe impact the proposal will have on the community, the town and its environment, we believe that the said application has a major flaws and inaccuracies. There has been little community consultation and the documentation contained within the outline application is littered with omissions, inaccuracies, misspellings and inconsistencies, and is therefore misrepresenting fact, lacks any credibility and weight and is not ready for or worthy of consultation. More importantly, and this must be instantly addressed, Stuart Michael Associates, the consulting engineers for Bovis, have merely copied and pasted details of other developments they have been working on into this application, thereby implying that they have not obtained the relevant information for this particular development. Please see Draft Travel Plan paragraphs 2.15, 5.16 and 7.11. Additionally, their use of the Mayo's Land, Quedgeley, development as a comparison with the Oddington Road site in their assessment of trip generation etc, shows a complete lack of knowledge of each site. Stow's site is outside the town boundary, in a rural environment and with inadequate rural infrastructure. Mayo's Land is urban, set within dense housing and major urban infrastructure and road systems, thereby rendering it the least appropriate for comparison. Contrary to the Community Consultation document, many residents of Stow, most notably those who would be most affected by the development in King George's Field and Griffin Close, have said they were not contacted directly by Bovis. When asked whether anyone of

the 200 or so residents of Stow who were at the public meeting on 31st May in St. Edwards Church had seen one of the leaflets that Bovis claim were delivered to the people of Stow to engage them in their plans for the development, not one person responded in the affirmative. It was noticed that the two members of the Bovis team who were present appeared visibly shocked and were heard to say that they paid good money for those leaflets to be distributed. What happened?

Further community consultation inadequacies are:

- Date for public consultation of Wednesday 19th December with feedback required by 11th Jan. This is an entirely inappropriate time for community engagement.
- There was poor advertising of this exhibition and, on the day, no publicity in the town, no direction notices to St. Edward's Hall where the exhibition was taking place and only one A4 notice inside the building notifying the location of the exhibition.
- The exhibition was badly handled and Bovis staff did not seem fully knowledgeable, with members of the public receiving different responses to the same question depending on who was asked.
- The plans that were displayed were also inaccurate, resulting in documents that were not adequate for proper consultation. The images of the proposed houses were purely a pastiche and the public was not informed that they do not reflect what Bovis was proposing to build. This is not adequate consultation.
- The first public meeting on 8th March, organised by Stow Town Council to discuss the development, was not attended by a member of the Bovis team, which was entirely unacceptable considering the size of the company and the importance of the event and further demonstrated the company's lack of intention of engaging with the community.
- Further to this, Bovis attended a meeting on 14 May 2013 organised with Stow Town Council in order to fully discuss the proposal. They attended with only one A3 plan of the site stating that they were unable to produce more appropriate documents because the printer wasn't working. Since then, there have been various versions of the proposed plan, with alterations to positions of footpaths and allotments etc, none of which is clearly numbered and identifying the most current.

Further significant evidence of the lack of engagement with the Stow community was highly apparent at the meeting chaired by Geoffrey Clifton Brown on 31st May. Upwards of 200 members of the public were present. Questions and concerns were raised about many things such as:

- Highways issues and the direct impact of a minimum of 300 cars would have on the roads and Bovis replied that highways concerns are not their problem and the public's concerns should be referred to County Highways.
- Schools and the lack of places in the Stow primary schools and significant issues surrounding the capacity of The Cotswolds Academy in Bourton on the Water and Bovis merely abrogated any responsibility in this area to Gloucestershire County Council.
- Sewage and waste experienced by a gentleman who farms near the Evenlode Sewage Works, such as the over-running drains and raw sewage seen in the Evenlode brought about after major new construction and development in Moreton in Marsh. Bovis yet again passed the buck onto Thames Water, although they at least suggested they may be prepared to make a contribution.

These demonstrate yet a further lack of resolution of and responsibility to any issue that is of serious and genuine concern to the community.

However, as poor and unacceptable were Bovis' consultation endeavours, it is the paucity of accurate information, errors and omissions in the application that form the crux of our concern that it is potentially misleading. To begin with, Stow on the Wold is a town and not a village as referred to throughout the Planning Statement and beyond. Also, if reference were going to be made, however inappropriately, to another planning application in Bovis' Planning Statement, it would have been beholden of the author to spell any names correctly. Further errors and omissions are legion, but include:

- The Planning Statement is highly misleading in that it inappropriately and erroneously states: 3.1 '***There is no relevant planning application history for this site***'. Reference just needs to be made to CDC's Planning Register.
- Reference is made to Stow on the Wold's emerging Draft Neighbourhood Plan. This document has no weight or status legally as it is merely a draft for consultation. This consultation has not taken place and the information therein is not available for reference.
- Being only an Outline Application, how can any of the material evidence that will severely impact on the town be assessed in terms of objection? How can desk-based evidence suffice? Supposition and assumption on the part of the Engineering Consultants, given their inability to present true representative facts with regard to traffic generated from a development this size is unacceptable.
- With no summaries for any of the assessments, how can CDC or the general public make informed objection to any of the issues therein, most especially the Visual Impact Statement where Bovis have arbitrarily and subjectively picked the category that most suits their needs. The Archaeological Assessment identifies a significant presence of notable evidence yet there is no summary to suggest what must be done to preserve or enhance the findings, for example.
- Keys for most of the diagrams/figures are incomplete or unclear
- Lack of local knowledge highlighted in figure 3.1 of the Travel Plan with Health Centre placed in Market Square, in fact that building is the chemist's shop.
- There are no industrial units south of the 'village' on the A429 where the new residents can work. (Travel Plan 3.13) This is yet further misinformation.
- There is no evidence of who will live in these houses, where the occupants of 73 affordable homes will be found and where all the residents will work.
- No acknowledgement of the fact that the development is surrounded by fields on 3 and a half of the perimeter edges and has no link whatsoever with the town and adjoining development.
- The bund beyond the remnants of the dry stone wall that abuts the King George's Field is not part of the application site. It is, in fact, part of the playing field site and belongs to the town and is held in trust by Fields in Trust who say the area can only be used for sport and recreation.

The D2 Planning correspondence to CDC dated 26th February 2013, also a consultation document, describes in some detail, under the **Site and Proposed Development** heading, the application site. Inaccuracies include:

- They describe that the land is currently in agricultural use whereas it should be described accurately as thus: "*this land is designated by the Natural England*

Information Note TINO49 as Grade 3A, which is considered the best and most versatile agricultural land.”

- ***‘The site comprises two fields divided by the remnants of a Cotswold Stone wall.’*** This wall is actually an ancient division between two fields and is part of the original historic field structure.
- They say that the ***‘topography of the site falls from the south west to the north west the highest point at 187m AOD in the north east corner.’*** In fact, the highest point of the site is the northwest corner and the level in the northeast corner is the lowest at 161m (a drop of 26m).
- ***‘The site is defined to the west by an intermittent degraded hedgerow where it abuts King Georges Field’.*** The established trees to this boundary actually are on the site of the original dry stone boundary wall. The letter states that the ***‘northern, eastern and southern boundaries consist of mature hedgerows’***. A site inspection has revealed that the northern boundary, although overgrown, was originally a Cotswold dry-stone boundary wall. The southern boundary, which they also describe as *mature hedgerow* is clearly an overgrown hedge that without doubt follows the line of the original dry-stone boundary wall. Each of these Cotswold dry-stone boundary walls is subject to the retained Policy 45 of CDC’s Local Plan where it states that ***‘where a development site contains, or is bounded by, Cotswold dry-stone or other walls, whatever their condition, every effort should be made to protect and repair them, re-using local stone wherever possible, as part of the development proposal’***. This information is not present in this proposal.
- D2’s letter to CDC of 26th February 2013 states that the application is likely to include a Draft Heads of Terms, Site Investigation Report, Noise Survey, Energy Statement and Lighting Strategy. These important documents are not, as suggested, included with Bovis’ application and any informed objections cannot be made without them being available for consultation.

As a result of these omissions and failure to provide accurate information, D2 Planning should be invited to submit a new and accurate report to CDC so that the latter could accurately assess whether an E.I.A. should be submitted and the public be provided with accurate information for consultation.

The Transport Assessment (alongside the Draft Travel Plan) appears to be a desktop appraisal which is inaccurate and incomplete in many aspects. Herewith a selection:

- Distance from the town centre and its shops and bus stops to middle of the site is >1.3km, not 800m – 1km as Bovis suggests.
- The closest railway station is not Moreton in Marsh but Kingham and both have serious parking issues.
- Tick boxes suggesting that the site conforms to guidelines for walking or cycling etc have incorrect and inadequate distances and are therefore inappropriately ticked.
- The site is stated to conform to bus stop distance requirements of 300m when it is, in fact, 500m from the nearest bus stop to the centre of the site. This bus has but two services a day, outside commuting hours and only to Cheltenham. There is no return service to this stop.
- Incorrect statement that the 803 bus runs past the site.

- Failure to acknowledge that the centre of the site is at least a 1.3km walk to the town centre for all amenities and there is an incline of 171 feet. This is not a sustainable equation for travel on foot or bicycle.
- There are no pedestrian or cycle access points or paths, informal or otherwise on the site boundary other than the entrance to the site.
- The Transport Assessment States: '*in view of the low speed restrictions within the village and relatively low level of traffic, it is considered that there are good opportunities for on-road cycling*'. This site, situated on the outside edge of a hill, is outside the town on a major A road with, during peak times heavy traffic. Yet a further indication of lack of local knowledge.
- Bovis attempts to mitigate the significant effect a development of this size will have on the environment by offering travel packs that contain vouchers towards bicycles and towards three months bus travel on buses operated by a company that has no service to Stow are inadequate. These are not adequate measures to address the severe impact this increase in traffic and pollution will have on the area and will certainly not encourage people to cycle up a hill or catch a bus that is non-existent or will not take them to work.

This planning application in its present form is wholly unacceptable, with inaccurate and incomplete evidence and significant misinformation. The fact that the Travel Plan documents are obviously cut and pasted from other work done by the consultant engineers on different sites elsewhere, is to us a misrepresentation of facts. We recommend that Cotswold District Council invites Bovis to withdraw the application, take remedial action and re-submit a credible proposal based on fact and physical evidence.

Given our limited resources we have only been able this far to examine three of the vast catalogue of supporting documents. The myriad faults in those give us concern that the quality of the rest may also be suspect. We therefore urge Cotswold District Council to take a forensic look at all the supporting documents and insist that errors and misapprehensions are corrected before a reworked application could be considered.

Yours sincerely

Alun M White
Chairman
Stow-on-the-Wold Town Council

Chris Turner
Chairman of Planning Committee
Stow on the Wold Town Council

Encl:
Previous Oddington Road application refusals
Photographs of Site