

Eastington Parish Council response to FEI 8

Firstly EPC note that the description of development is listed on the online service currently as 'Amendment to outline planning application in respect of land at M5 Junction 13 West of Stonehouse, Eastington, Gloucestershire' implies that planning permission has already been granted once and that this application is only for an amendment. Might this be amended please.

Eastington Parish Council maintain their OBJECTION to the scheme as put forward in previous responses the proposals remain in the wrong place and the information does not overcome the concerns of Eastington Parish Council. Concerns are set out below.

Traffic

The site is fundamentally in the wrong place to accommodate the traffic to and from the site, being so close to the acknowledged failing M5 Junction 13 to ensure safe running of the A419 and the M5 motorway, despite the duelling of the carriageway between the M5 and the Chipmans Platt roundabout. Whilst works to the A419 are proposed to start in early 2019 which will, in theory, speed up dispersion of existing traffic over the Chipmans Platt roundabout and towards Stroud from the M5 junction this is not yet proven to have worked, let alone that it can cope with the additional traffic emanating from the 1350 additional houses beginning to come on line under the November 2015 housing and employment allocation SA2. Overall it is understood that the ONS forecast (for 20 years) of 12800 houses on top of the existing count of 48,000 housing stock means 30,000 more people and, according to TRICS projected traffic data, around 128000 additional car movements from those new houses within the district and many of those using or commuting in or out of J13, particularly at peak hours. As such there should be no further junctions along the A419 in close proximity to the M5 Junction as the existing and already proposed traffic pressure needs no further hindrance from being able to flow freely, in particular up the M5 slip roads safely. The creation of a signalised junction effectively stops/blocks the constant movement of traffic and if this is also a pedestrian route from overflow/alternative parking outside of the ground, or in the parcel of land outlined in red to the south of the A417 there could be further backing up of traffic. The slip roads are not supposed to be stacked car parking but slowing down lanes. How long must it be until the queue becomes an accident site.

Evening peak hours will very likely coincide with arrival at the ground for a weekday match and any hold up at the new junction into the ground will quickly lead to tail backs onto the M5 given its close proximity. Team supporters are also likely to come from either north or south, and therefore the weight of traffic is likely to be on one or other slip road, not spread across both, causing more concentrated traffic build up on one or other slip road. This is a safety hazard which seems to have by passed Highways England's attention. Two snap surveys on Tuesday morning 8/1/2019 and Wednesday 16/1/2019 indicated that only 52/53 vehicles travelling at very slow pace towards Stroud were accommodated on the A419 as they could not get through the Chipmans Platt roundabout. This again caused queuing down the slip road and across the Motorway roundabout. Additional traffic using or servicing the Stadium would exacerbate this.

If the stadium is granted there is no land capacity or other access potential at the site to retrofit a more safe or workable transport scheme. A report by Atkins on the previous local plan said that there should be no more development west of Sainsbury's roundabout until new road works are completed. Is there adequate growth modelling to support this site to account for WOS growth and all of the other approved and proposed developments around Stroud which will inevitably have traffic movements heading to the M5 and A419 and is this fit for purpose or premature as we don't know that the projected traffic modelling actually works.

How will traffic monitoring by Marshalls/Police actually action any proactive, timely solutions to stop the surrounding roads clogging up and affecting the M5 J13 in the event of the projected traffic modelling not working?

In trying to avoid traffic jams there will be significant rat running through Eastington and other villages which is already noted to have increased in the last year even without much of the West of Stonehouse housing allocation having been built, particularly in the peak hours of traffic.

Dec 2018 FEI08 suggests that away coaches will access the site from the A419 rather than the coach route via Grove Lane as was previously proposed. Is this noted by County Highways and does it matter. Concern remains about free flow of traffic within and outside of the site if there is conflict between vehicles going to different car parks.

Other matters

Policing

Who will pay for the marshalling/Policing indefinitely?

Ecology

Offsetting the ecological harm from the site to the proposed nature reserve to the west of the M5 is irrelevant and does not assist ecology at the actual site. Loss of established ecological value is not fairly offset by the planting of new hedges. The true ecological approach would be to work within the ecology on the site and design a scheme appropriate to it.

Noise concerns

The stadium noise at the time of an 'exciting passage of play' will be 55 decibels (dB) at William Morris House/College (WMH) or at Chipmans Platt. 55decibels (dB) is approximately the same as light traffic (50dB) or conversational speech (60 dB) or listening to a refrigerator (50dB) or air conditioner (60 dB). The graphs produced as part of FEI8 appear to show that there will be noise above this level during play and for a considerable period of time.

Hoare Lea (acting for the applicant) have put in place suggestions as to how the sound implications for the stadium will take account of the likes of William Morris

House by suggesting the following but this does not appear likely if one takes into account the game and emerging traffic after games which all passes close to WMH:

- That for the duration of the organised event Laeq,5min levels will not exceed 55dB and
- Maximum levels L_{Amax,F} will not exceed 70dB more than six times per organised event.

The World Health Organisation issues a paper of Night noise guidelines for Europe in 2009 which showed that at levels of 40 to 55 dB Adverse health effects are observed among the exposed population. Many people have to adapt their lives to cope with the noise at night and that Vulnerable groups are more severely affected.

Above 55 dB The situation is considered increasingly dangerous for public health. Adverse health effects occur frequently, a sizeable proportion of the population is highly annoyed and sleep-disturbed at these levels.

There is also evidence that the risk of cardiovascular disease increases.

It is suggested by Hoare Lea that because monitoring of noises at locations close to Chipmans Plat and WMH are likely to be sensitive to other noises then perhaps monitoring should be carried out closer to the stadium. This could prevent other noises being captured and as such Eastington Parish Council consider that additional monitoring take place rather than simply changing the location of the monitoring, not least as sounds within the stadium may be baffled by the actual stadium construction at closer distances whereas the noises rising from the stadium and coming from emerging vehicles at the end of matches may still travel to the likes of WMH.

A Noise Operational Management Plan seeks to control noise at WMH and 'existing houses at the time of the consent of the stadium' (what about all of the houses going up the hill at WOS?). It appears that play normally ends at 22.00 unless there are penalties or extra time.

No noise data is supplied in respect of all of the fans leaving the stadium and making their way back to stonehouse rail station, hanging around on the station for their trains or heading away by cars further afield.

There are concerns about other uses of this stadium site and the wider red-lined area being used as a music entertainment venue.

The plan suggest that the NOMP may be Modified in the future in agreement between FGRFC and the Council but it is considered necessary to look carefully into this wording to ensure that the Council has the final say on when and how the NOMP should be modified.

Anticipated redirected flight paths of bats around the stadium site should prevent use of flood lighting of training pitches and therefore limit training noise from local residents assuming that the agents suggested flood light prevention is carried forward into a condition on ecological and residential amenity grounds.

Deliveries or cleaning/servicing outside areas should not be carried out (such as restocking noises, external mower/litter clearance/washing down areas of mess from previous nights) early on a Sunday Morning.

The 2m acoustic barrier between the main site entrance and the Oldbury Services could be a prominent urban feature on the A419 if it is so closely related to the footway along the road and could deflect road noise back upon the properties it seeks to protect from stadium noise. Further consideration of siting and materials of this are required.

Stroud District Local Plan Review Nov 2018

The site is not yet allocated but is being considered in the Stroud District Local Plan Review Nov 2018. The Sustainability Appraisal for this site in the Stroud District Local Plan Review demonstrates that the site should not be allocated given that all but four of the indicators are negative or not relevant. This site is attempting to mitigate for harms already identified. It is the wrong site for the stadium.

The site scores badly in relation to biodiversity and geodiversity, landscape, historic environment, water quality, flooding and efficient landuse. The site scores positively for health but the facilities at the proposed stadium are thought to be only for Forest Green Rovers staff and possibly academy people, not for public/community use. Further what is left of the Green Infrastructure on the site will be adjacent to the A419 and M5 in the surroundings of vast carparking areas so not the most inviting sites. Whilst in due course the canal routes should facilitate a pleasant lunch time activity or active commute to work for the similarly allocated business uses this will also be found at more sustainable sites where employees are more likely to choose to cycle.

Ecology

Natural England has already raised concern about this site (30ha of agricultural land) in the sustainability appraisal for the Stroud District Local Plan Review Nov 2018 as it may not demonstrate efficient landuse/uses good quality agricultural land. Natural England also noted in their earlier comments regarding application S16/0043/OUT that their suggestion to include a 'green bridge' were already disregarded. The duelling of the carriageway width with significant loss of established and substantial green infrastructure, loss of other long standing habitat rich environments and consequent delay in rebuilding that habitat is considered to be unacceptable and shows no overall regard for the environment. With only a concept plan to consider the proposal it is unclear how the proposed increase in biodiversity units and lengths of hedgerow can be secured if the scheme were to be approved.

It appears that the stadium could be sited differently to show more respect to/retain the established highest biodiversity elements of the site but this has not been undertaken.

Communal uses

The supporting document with FE18 suggests that the District lacks good quality sporting facilities. In order to address this the agent suggests that the Local Plan

Review Emerging Strategy paper has been designed to provide new sites that will help address the shortfall in sports and recreation facilities. Unfortunately this site is for private use by the FGR club and is not providing a valuable role in improving the supply and quality of sporting facilities within the District for the many. It may provide an entertainment choice but it is not designed for public fitness use.

Search for sites.

Other sites in the vale could be considered where it could also be within walking distance of the Cam/Dursley railway station and without the complex traffic concerns of the M5 junctions as they would be more remote. Other sites in the vale are equidistant in time travelled from Nailsworth and within the Site Search area identified by Ecotricity in their S.16/0043/OUT documents as received on 8/1/2016. A renewed Site search document has not been carried out for the reduced size scheme.

Eastington NDP

The site is outside of settlement boundaries in the current Local Plan of November 2015 and of the made Eastington NDP 2016. These plans are considered to be up to date and the application is contrary to policies in each of them. Conflicts are found with EP2 (Protect and enhance biodiversity), EP4 (siting and design of new development and conservation), EP6 (Business and Employment), EP8 (traffic and transport) and EP9 (Public Rights of Way and Wildlife corridors) of the Eastington Neighbourhood Plan in particular.

Conclusion

For the above reasons the application for this 5,000 (to 10,000) seater stadium should be refused as it is poorly sited in a location unsuitable for it. Eastington Parish Council retain the right to refer Council officers to the representations made on its behalf by Troy Planning and Helix Transport.

Whether or not Forest Green Rovers need a new stadium or not and whether the land has been purchased by them is not material to the consideration here. The considerations are whether the proposed new stadium site is the right place for a stadium, whether it accords with the development plan which includes the Eastington NDP and whether it can appropriately and safely be located at this location.

Eastington Parish Council consider that this is not an appropriate site - it is proposed in the wrong place.

The information in FE18 does not offer such benefits to the scheme which would overcome the concerns previously raised.