

## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="√"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="√"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Find below the reasons why the proposed Wisloe Green development (PS37) in the parish of Slimbridge should not be adopted within the Local Plan, I do not support the Council's preferred strategy:

- The proposed site is located outside of the settlement limits for Cam and Slimbridge and therefore development of this land is contrary to policy CP2 of the Local Plan. It is also beyond the adopted settlement development limits and does not satisfy any of the principles of Core Policy CP15.
- The proposal would clearly involve the further unplanned extension of Cam into adjoining greenfield land and will lead to the coalescence of Dursley/Cam with the villages of Slimbridge, Cambridge and Gossington creating an urban sprawl. This will completely remove any meaningful physical separation of these villages, this is contrary to CP15 which was specified to avoid this type of coalescence. The character and appearance of the surrounding landscape will be irrevocably changed for these villages.

- Natural England classifies the land at Wisloe Green to be Grade 2 (BMV) and development of this land is contrary to Local Plan guidelines. These requirements are currently being strengthened to reflect the hardening of Government policy to fight the factors causing climate change, good quality farm land should not be used for development.
- The current Local Plan has designated Cam and Dursley as Tier 1 settlements, up to their parish boundaries. Slimbridge and Cambridge have been designated Tier 3 and 4 settlements respectively. A development of this scale would effectively merge these villages with Cam and Dursley into one urban sprawl making these villages Tier 1 settlements also, which is contrary to the Local Plan assigned tiering levels.
- The proposed development would utilise green field agricultural land rather than brown fields which is contrary to the populous view expressed in the Local Plan feedback and commitments made by SDC in the Local Plan. There are significant alternative brown field sites in the district which should be developed before pristine farmland is destroyed.
- The local area is recognised in SDC's own report as a dormitory region where the vast majority of journeys are made by personal car, very few journeys (circa 1%) are by train. Building a further 1500 houses in addition to the 2500 houses being added to Cam will only make the situation worse, recognising the plans are to introduce very little additional employment locally. This is not a sustainable proposal and does not align with SDC's laudable CN2030 objectives. Two other large sites which have been consulted upon but were not contained within the current Local Plan (PGP1 & PGP2) are both nearer to main centres of employment and nearer to the M5 junctions.
- In December 2020 many properties in Slimbridge were flooded when the Lighenbrook, which runs through the Wisloe site, overflowed following heavy rains. This is becoming a more frequent occurrence, the whole area is flat, low lying and has a high water table. Building 1500 homes on the farmland at Wisloe will increase run-off and make the situation worse downstream at Slimbridge and Cambridge (for the Cam). Mitigation for flooding is very difficult to achieve effectively.
- There will also be increases in standard infrastructure demands on; secondary schools, Dr surgeries, sport centres, car-parking etc which are already full to capacity with no known additional funding or space planned to match the significant increase in resident numbers. Furthermore, it is now apparent there is a high-pressure gas pipeline running the full length of the proposed site which will either require moving, reinforcing or having a 140m no build clearway over. The noise mitigation measures planned for the adjacent site at Draycott (PS24) is to build high embankments and fences, this needs to be reflected at PS37. Add to this the need for an additional bridge or major modification to the existing M5 bridge and the total cost for infrastructure looks very high. Any developer will struggle to recover their costs if all these infrastructure promises are to be kept. I suspect that if PS37 is included then very few of the infrastructure plans will be implemented due to the excessive cost, which will totally undermine the original case for a stand-alone garden village. In contrast, other sites at PGP1 and PGP2 have large developer support which accommodates the infrastructure costs.
- The 'Garden Village' name is clearly nothing more than a PR marketing stunt to get a housing estate cleared, it is not separate from the planned north Cam housing extension, most of the infrastructure and employment will be accessed outside of the estate and it does not adhere to the published principles derived from Garden Cities and Towns.
- The proposed number of houses required for the Stroud District is significantly in excess of what is normally required to support a Local Plan. A reduction in the size of over-supply buffer, by removing PS37 from the Local Plan, can be achieved and still retain a decent buffer.
- In summary, the proposed development does not comply with many of the planning guidelines which are fundamentally there to avoid this type of urban sprawl of towns into the surrounding countryside beyond their parish boundaries. The proposed development would not have a coherent relationship with the existing village settlements. It is naïve in the extreme to believe that the 'Garden Village' development will not significantly increase the demands on the surrounding infrastructure and the level of road traffic to a point of log jam at busy periods e.g. rush hours and school run to Dursley. Indeed, the infrastructure cost burden probably makes the site unviable. There are two other large sites available (PGP 1 & PGP 2) which have been consulted on, but which were not included within the Local Plan, both are considerably more sustainable than PS37. PS37 should therefore be removed from the Local Plan.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Proposed site PS37 should be removed as a site allocation within the Local Plan.

(Continue on a separate sheet /expand box if necessary)

**Please note** *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

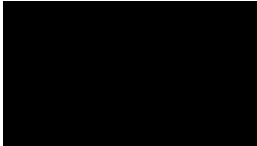
**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:


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Date:

21/7/21
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