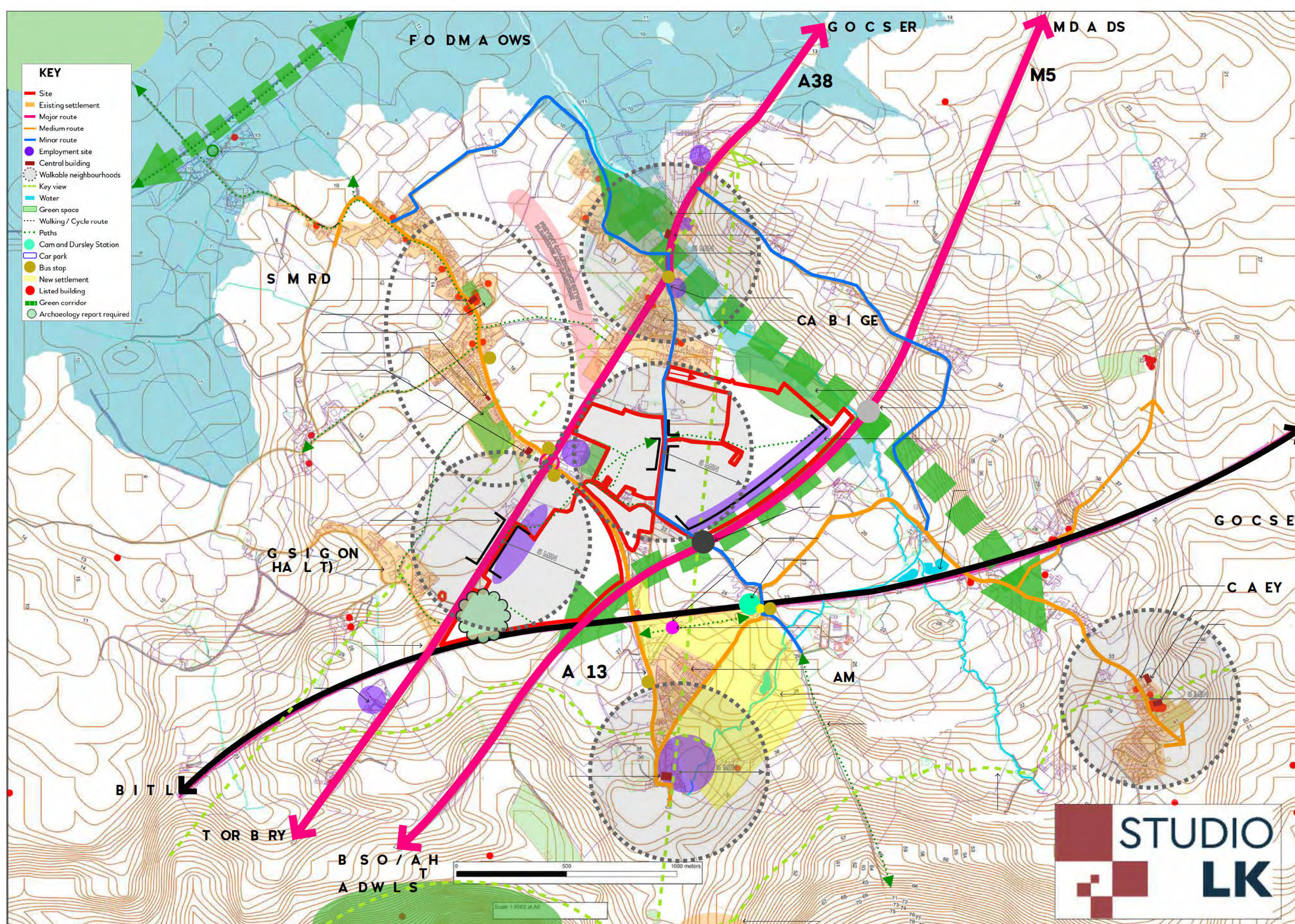


Local Views

To Help Shape The Proposed New Settlement

Visioning Workshops

Visioning Workshops undertaken in August and September 2019 with stakeholders and the local community will help inform how the new settlement might take shape. The plan below is an example of one of the workshop outcomes.



Creating a Sustainable Community

Approximately 150 people attended the Public Workshop and identified a wide range of issues important to them, for example:

- Avoid coalescence between settlements
- Not worsen traffic congestion associated with connections to the M5
- Ensure there will be adequate provision of school places and health services
- Ensure the architecture and public realm is well designed to promote health and wellbeing
- Improve the existing drainage
- Improve public transport and links to public transport
- Be truly sustainable including being energy efficient and providing a public realm which prioritises walking and cycling
- High quality design and long term stewardship

Working with the Local Community

There will be further engagement through an Enquiry by Design process run by the Ernest Cook Trust and Gloucestershire County Council which will encourage people to play an active part in the development of a deliverable masterplan.

Bid to join Garden Communities programme

Bid to join Garden Communities programme

All questions must be addressed, apart from those specifically designated for transformational community proposals and garden villages proposing fewer than 5,000 homes (Q 2, 4). If you have questions, or would like to discuss an proposal ahead of submission, please contact gardencommunities@communities.gsi.gov.uk.

Bids should be submitted by **09/11/2018**

Please click here to open the [prospectus](#).

Name of local authorities and promoters/landowners/developers involved (clearly identifying lead authority):

Stroud District Council (Lead Authority), Gloucestershire County Council,
The Ernest Cook Trust

Main Contact

§. 40(2)

Telephone Number

§. 40(2)

Email Address

§. 40(2)@stroud.gov.uk

Organisation

Stroud District Council

Headline Information

1. Provide a description of the proposed garden community including proposed number of homes, including types and tenures, number of jobs it hopes to create, employment space, schools and other community facilities, green space provision, number of district and local centres, amount of retail and other commercial space proposed; key items of infrastructure needed to support delivery of the garden community. Please itemise these below.

Housing

Number of homes

5,000

Delivered by

By 2050

Types of homes and tenures

This majority of the site is owned by Gloucestershire County Council and The Ernest Cook Trust. Because this site is not promoted by a single volume housebuilder, it represents an opportunity to deliver a greater range of housing types and tenures. Both Gloucestershire County Council and The Ernest Cook Trust understand the need for delivery but also wish to maintain a long term relationship in the site. The owners also recognise the benefit of delivery of a range of non competing partners – volume house builders, small to medium builders, registered providers and long term rental.

Wisloe Green will encourage a wide demographic and provide a range of dwelling types including smaller affordable homes, family housing, specialist care and flats.

Tenures

The tenure mix is proposed as follows;

Open Market 60% made up of:

- 10% self build
- 30% volume housebuilder
- 20% SME

Affordable Housing 30% made up of:

Proportions to be guided by local need, to include;

- Rental
- Social rent
- Intermediate tenure
- Starter Homes
- Discount open market

Build-to rent 10%

Social Care - Gloucestershire County Council

Employment

Number of jobs created

3,800

Approx. area of employment space (ha)

16

Key types of jobs created

Advanced technology and manufacturing (Gloucestershire and Bristol aerospace).
Light manufacturing.

Approx. area of retail / commercial space (ha)

1

Community Infrastructure

Number of schools

3

Types and size of schools (if known)

By 2025 – 1 Primary School (2FE) and nursery
By 2035 – 2 Primary Schools (2FE) and nursery expansion
By 2040 – 1 Secondary/college

Number of health and care facilities

1

Types and size of health and care facilities (if known)

Size to be confirmed with Clinical Commissioning Group and Gloucestershire County Council.

Number of community facilities

3

Types and size of community facilities (if known)

By 2025

- 1 self financing multi use community hub.
- Initial sport provision
- Allotments
- Recreation space

By 2035

- Second community facility.

Number of district and local centres

1

Site Space

Approx. area of site space (ha)

205

Approx. area of green space (ha)

56

You will be asked at the end of the form to provide evidence of the following:

- **Location Plan** - One or more plans showing the location of the proposed garden community outlined in red. It should also indicate the location of any nearby communities/development, and the boundaries of the Local Planning Authority, County Council, LEP. Include site boundary coordinates. This plan should also highlight the extent of brownfield conditions on the site, if relevant.
- **Strategic Framework Plan** for the proposed garden community – this should show: the broad disposition of proposed land uses and major infrastructure proposed.
- **Annual housing trajectory** for the garden community

2. If 10,000 or fewer homes are proposed, please provide details of the circumstances that you believe make the proposal suitable for consideration (refer to paragraph 5 of the prospectus)

Wisloe Green sits at the heart of a network of small rural villages and the historic industrial settlements of Cam and Dursley. Those settlements have seen great change in their employment structure as well as some transformational development which has provided high quality social and housing infrastructure. At this stage, the scale of the proposed community at Wisloe Green is intended to complement the pattern of existing settlements by delivering exceptional quality and innovation within a green setting rather than scale through the following:

- Active use of new housing delivery models to improve access to a decent home through:
 - Build to Rent
 - Elderly / Social Care – Gloucestershire County Council. Housing with Care provides independent living with on-site 24 hour care and support services.
 - Social Housing – Stroud District Council
- Long-term stewardship of key land, buildings and community infrastructure by The Ernest Cook Trust and Gloucestershire County Council
- Serviced plot approach to land release in order to control quality
- Phased introduction of community infrastructure, led by the community
- Embedded interaction between town and country provided by the long-established Ernest Cook Trust

There is additional land adjacent to the initial Garden village proposal to the south east which offers the potential to deliver a significantly expanded new settlement to help meet future local growth requirements beyond 2040.

3. Question not required as your proposal is for 5,000 or more homes.

4. Is the proposed garden community a free-standing or transformational garden community?

Free-standing

5. Question not required as your proposal is a free-standing community.

You will be asked at the end of the form to provide evidence of support for your proposal from the following:

- a) **Local MP(s)**
- b) **Local community**
- c) **Local Enterprise Partnership(s)**
- d) **County Council** (where relevant)
- e) **Neighbouring local authorities**
- f) **For private sector led** – the relevant local authority
- g) **Any other key stakeholders**

You will be asked to answer 'Yes', 'No', or 'Awaiting Response.' If 'Yes' is selected you will need to provide details of engagement and attach relevant evidence. If 'No' or 'Awaiting Response' is selected you will need to provide reasoning.

Strategic Approach

6. Provide a statement on how the proposed garden community fits with local or area housing and economic plans & strategies; how it will meet anticipated population growth both within the relevant Local Plan period and beyond; and how it will address local housing affordability issues.

a) How it fits with local housing and economic plans and strategies

The Strategic Economic Plan for Gloucestershire

This plan, produced by the local economic partnership gFirstLEP, sets out a clear vision and strategic priorities for delivering future economic growth in Gloucestershire. The plan promotes a Gloucestershire growth zone to deliver quality employment land in proximity to the M5 motorway attractive to businesses.

The development of homes and employment land at Wisloe, located between the A38 and M5 and in close proximity to the Bristol-Birmingham rail line would entirely accord with the ambitions of the growth zone project.

The Local Plan

The Local Plan Review Emerging Strategy seeks to develop an exemplar new settlement which will meet the housing and employment needs of the District whilst also delivering a step change in services and facilities available in the local area and existing communities of Slimbridge/Cambridge/Gossington. The mini-vision for this area included within the plan states: "Following Garden City principles, the mix of uses, design quality and accessible layout within a green setting will deliver a truly sustainable pattern of living for new and existing local residents."

b) How it will meet anticipated population growth

Under the standard housing methodology, Government requires the Local Plan Review to provide for at least 603 new homes per year (based on the latest 2016 household projections), or at least 638 new homes per year (based on the previous 2014 household projections). Either way, this requires a 32% to 40% increase on the figure in the current Local Plan of 456 homes per year.

To meet this new challenging target every year over a 20-year period will require the Local Plan Review to identify land for at least 12,800 new homes. Currently, 7,100 new homes have received permission or are already identified in the current Local Plan and so the Council is required to identify land for at least 5,700 homes to meet this target.

Delivering a new settlement at Wisloe provides the opportunity to deliver at least 1,500 of these new homes by 2040 – or over 25% of the additional growth required. If growth can be accelerated even further, through economies of scale, innovative design and construction solutions, early delivery of infrastructure and new delivery vehicles, there is the opportunity to deliver greater levels of growth than currently envisaged in the emerging Strategy.

There is additional land identified by the promoters of the Garden village which offers the potential to deliver a significant proportion of future growth requirements beyond 2040, building upon the solid foundation of infrastructure-led growth during the next plan period.

c) How it will address local housing affordability issues

The latest affordability ratio between income and house prices in Stroud District is 8.8 – one of the highest levels in the South West which is a major factor in driving the future housing requirement in the District using the new standard methodology.

The Wisloe new settlement is being jointly promoted by Gloucestershire County Council (a local authority) and Ernest Cook Trust (an educational charity). Unlike housing developers, neither organisation is bound by the requirement to deliver a set profit level. Both also have wider social and environmental objectives. Consequently there are opportunities to deliver a greater variety of housing solutions and tenures, including housing with care. Both landowners also have a willingness to explore innovative development approaches and construction methods that can offset higher development costs by generating additional sales value.

As an experienced affordable housing enabling authority with a strong track record of delivery as well as being a stock retention authority, the District Council has also recently been successfully building council housing (over 220 since 2013) to meet local affordable housing needs and has recent experience of joint venture partnerships with the private sector to bring forward market and affordable homes. The Council would like to explore opportunities to deliver further new council houses signalled by the Government's decision to remove the HRA borrowing cap.

Wisloe development offers the opportunity for a housing partnership to deliver a greater proportion of affordable housing than would normally be delivered through a private sector led market scheme.

d) How it will provide and embed opportunities to expand further in the future if required

Gloucestershire County Council and The Ernest Cook Trust own a substantial tract of adjoining land which could be made available to develop the longer term vision for a Garden village at Wisloe. The District Council has already identified that 43 hectares of land on the other side of the M5 motorway within the ownership of the County Council has future potential, having assessed broad planning matters, including landscape, flood risk, heritage and accessibility issues. The additional land could also help to improve the connectivity of the future village with an expanded Cam and Dursley rail station helping to benefit the delivery of sustainable transport within the wider area.

Local Leadership

7 a) Set out the extent of community engagement undertaken to date in respect of the garden community. This should include any engagement with key local stakeholders, for example, Sustainability and Transformation Partnerships, LEPs, energy district network operators, etc.

Community and stakeholder engagement is a key factor in delivering a successful strategy for Wisloe Green Garden Village. The process of engagement has already started through the Local Plan. Stroud District Council have identified the site in their emerging Local Plan which has been and will continue to be the subject of widespread public consultation.

Stroud District Council have had early meetings with a range of stakeholders including Highways England, South Gloucestershire Council, Gloucestershire County Council as transport authority and lead local flood authority and the Environment Agency. Going forward, there is a programme of stakeholder meetings planned for the Local Plan Review public consultation this Autumn 2018.

Gloucestershire County Council have met with the NHS Lead Commissioner for Older People to determine the amount of housing with care provision which could potentially be delivered at Wisloe Green.

b) How do you intend to engage with local residents and stakeholders about the garden community proposal in the future?

Consultation going forward will be a mix of formal and informal with a focus on innovative ways in which to engage with different groups. The structure of the Garden Village will include a Delivery Board and a Stakeholder Board with outreach programmes flowing from that - ranging from residents through to local schools and businesses.

8. Where a proposed garden community is cross-boundary or located close to the boundaries of neighbouring authorities, describe the type and level of local authority co-operation and joint working taking place.

Whilst Wisloe is not immediately on the border with South Gloucestershire, the Council is actively working with South Gloucestershire Council to co-ordinate plan-making activities across administrative boundaries. In the immediate context of the West of England Joint Spatial Plan, a Statement of Common Ground has recently been signed by planning managers from both authorities which summarises the nature of existing co-operation and how we will work closer together in the future.

Growth proposals in South Gloucestershire and in Stroud District will rely on significant new infrastructure including highway junction improvements at M5 J14, A38 and other roads within the strategic network, developing additional rail capacity on the Bristol-Birmingham line and extending the MetroWest bus corridors from Bristol into Gloucestershire. These projects all involve developing joint working between South Gloucestershire, Gloucestershire County Council and Stroud District Council. Officer working is on-going and includes regular meetings, sharing data, developing joint statements.

Garden Community Vision

9 a) Set out the vision and key development objectives for the proposed garden community. Highlight how the garden community will address the qualities set out in the Prospectus, and any other principles considered important.

Wisloe Green is owned not by a developer, but by two local stakeholders, Gloucestershire County Council and The Ernest Cook Trust. Gloucestershire County Council's vision is to improve the quality of life for Gloucestershire people and communities. Wisloe Green represents an opportunity to achieve this vision. The Ernest Cook Trust is a large educational charity in England. It was founded in 1952 by the philanthropist Ernest Cook, the grandson of Thomas Cook. Each year the Trustees distribute educational grants to benefit children and young people, notably to schools for improving their outdoor education and play areas. The Trust are also land owners and own part of the proposed Wisloe Green site. In addition to education, its founder also had a passion for the countryside, and this included architecture and the built environment. Wisloe Green represents an opportunity to add to its legacy.

Combined with local support from Stroud District Council, with a recent track record of social and rural housing delivery, the approach to Wisloe Green is both markedly different and quantifiable.

The vision is evolving, but the principles remain set:

- Allow the Severn Vale landscape and industrial heritage of the Stroud Valleys guide the identity of Wisloe Green, whether that is drawing from Slimbridge wetlands, or the density of Cam and Dursley in a rural setting.
 - As Wisloe Green grows over time, community, transport and employment infrastructure should also grow at the same pace. This will be led by an organic masterplan with its own core growth principles.
 - Walkable neighbourhoods reduce car dependency when coupled with the right mix of development and infrastructure. Wisloe Green community will deliver walkable mixed-use neighbourhoods.
 - Wisloe Green will be delivered as serviced land with a coherent design vision to maximise the range and type of housing and employment providers on-site. This will enable bespoke local providers and self-build groups to improve quality, local identity and drive construction innovation.
 - Wisloe Green will be guided by a Board and a series of partner groups that mix community knowledge with public and private sector technical experience to drive a local development agenda.
 - Education, the natural environment and social welfare are key aspects that the landowners commit to deliver themselves.
 - Wisloe Green is committed not only to walkable communities, but also innovation in transport infrastructure, to respond to changing travel patterns and social, retail and employment needs. It is in close proximity to Cam and Dursley Station which would benefit from reciprocal investment.
 - The original underlying theme of Garden Towns was to 'improve health and well-being'. Wisloe Green will maintain this as a core intervention in the way each aspect of the proposal is developed. Proposals will respond to different social sectors and age profiles of the community based upon a Healthy Community Assessment and subsequent delivery plan.
 - 'Learning from the Land' represents The Ernest Cook Trusts unique value to this project, specifically in the way that green space is delivered and then used. It represents a key principle that supports wellbeing, stewardships and biodiversity.
 - Development will respond to those technologies that are available now, but more importantly Wisloe Green will explore adaptability in each aspect of its infrastructure, housing and commercial space design. It will support the showcasing of new technology.
- None of this will be possible without the surety of commitment from two organisations that have a long-standing stake in Gloucestershire. The drive and ability to create a legacy is therefore markedly different in these circumstances. The Partnership would welcome the guidance and support of MHCLG and Homes England to deliver its ambitious but focused approach.

b) Provide details of review mechanisms and tools that will be put in place to secure delivery of the quality aspects of the garden community. E.g. a design review panel.

Quality is carried across the whole garden community concept, from design through to community infrastructure. Quality is derived from strong early leadership, a clear vision and then long-term ownership of a project that will last many years. The delivery partners have long-established links with Gloucestershire, through County governance and grass roots educational engagement. This will continue at a garden community level. Review mechanisms and measures of quality will be established through the delivery structure via a series of Boards, as set out in Question 12.c.

Deliverability

Milestones

10 a) Identify the key risks to delivery of the milestones between now and start on site shown in the timeline submitted with this bid and set out the measures you will take to mitigate these risks.

Development Plan Delays and Legal Challenge

- Monitor Development Plan Preparation and investigate twin tracking development plan reps with planning application/s or LDO/s

Planning Application Delays and Legal Challenge

- Agree PPA and full legal audit before planning submission including full review of EIA.

General Election

- Ensure development proposal is binding both in planning and legal terms.

Lack of infrastructure

- Ensure early consultation with Statutory Providers and ensure buy in to proposals at each stage. Also secure financial commitments/funding providers.

Delivery Delays

- Ensure the adoption of realistic/robust timescales as well as penalties for delays. Ensure development is properly master planned within phases.

Finance Delay

- Include a variety of funding sources in order to spread risk.

Environmental and Technical constraints need to be fully explored

- Undertake full suite of environmental and technical reports at earliest opportunity to identify risk and means of mitigation.

Brexit

- Ensure development proposal is binding and meets identified housing needs. Avoid financial dependence on EU sources which are at risk.

Recession/Economic Delay

- Ensure front loading and finance of key infrastructure to bring about development of housing.

Change in Local Government Structure eg Unitary / Officer Changes

- Ensure proposals are binding within development plan and early engagement with stakeholders.

Change in National Planning Policy Framework

- Review monitor and influence at local and national level of Governance.

Changes in Climate Change Legislation

- Review and Monitor and comment where necessary.

Landowner Disagreement/Legal Conflicts

- Ensure robust legal framework is in place.

Change to strategy/approach vision

- Ensure proposals are binding but have sufficient flexibility.

Consultee/Stakeholder Objections

- Ensure Consultees/Stakeholders are fully engaged throughout.

Land Value Capture Issues / Viability

- Ensure there is a reasonable return for landowners plus uplift for community gain and infrastructure. This will need to be means tested against market needs/forces.

b) Provide a high-level commentary on the assumptions that have been made with respect to the housing trajectory for the garden community.

The proposed housing trajectory assumes that Planning Permission is granted by the end of 2021 followed by completion of 160 dwellings per annum, split between:

- 1 volume builder – 48 pa
- 2 SMEs – 32 pa (16 each)
- 1 Built to Rent – 16 pa
- Self/custom -16 pa
- Affordable housing – mixed between volume, RP constructor and Stoud District
- Gloucester – social care

c) Set out any opportunities that there are to accelerate this housing trajectory including any interventions that would be needed to support acceleration.

Wilsoe Green will focus on an innovative approach to design and construction, including modern methods of construction and self build.

You will be asked at the end of the form to provide evidence of the following:

- A **timeline of the key milestones and dependencies** between now and start on site for the new garden community.
- A **structure chart / organogram** of the proposed governance structure for the garden community which shows the role and responsibilities of key project partners, e.g. Local Planning Authority, County Council, LEP, Government agencies, landowners, developers, etc.

Infrastructure

11 a) Provide a list of the key items of infrastructure that will be required to support delivery of the garden community. Transport-related; education, health, country parks, etc.

Social

- Schools – primary (2) and secondary (1)

Economic

- Serviced land
- Starter hubs

Environmental

- Green infrastructure
- Improvements to biodiversity

Transport

- Pedestrian links to Cam and Dursley Railway Station
- Pedestrian/cycle bridge over the M5

b) Outline any significant new or upgraded utility provision that will be required to support delivery of the garden community.

Enquiries and meetings with utility providers will serve to inform the capacity and demand/supply. High speed broadband will be essential. There should also be electric car charging points and potentially provision for automated vehicles.

Land

12. Provide a brief commentary on the land ownership and development promotion arrangements within the proposed garden community site. This should include:

a) Details of land owners, promoters and developers;

The land owners are Gloucestershire County Council and The Ernest Cook Trust. There are relatively small parcels of land in third party ownership, as detailed on the plan. These are required in the later phases of the development, beyond the Local Plan period.

b) Extent to which land is under option and any agreements in place;

N/a

c) Details of any discussions about delivery mechanisms and models which have taken place;

Stroud District Council, Gloucestershire County Council and The Ernest Cook Trust have been in focussed discussions about delivery models. The land owners and the Local Planning Authority are seeking an active part in the delivery of Wisloe Garden Village. These partners share an ambition to deliver something which is unique and ambitious for Wisloe Green. They propose that a bespoke model is developed, based on two Boards and a series of Groups and that long term stewardship is critical to successful place making.

A series of Wisloe Green Boards and Groups will be established, with the membership selected for their skills, knowledge or position as a stakeholder. Key to successful delivery of Wisloe Green is close cooperation of a wide range of partners including MHCLG, Homes England, statutory bodies, gFirst LEP and representatives from local business organisations and local interest groups. The Boards and groups are proposed as follows;

- Wisloe Green Development Board – Comprised of The Ernest Cook Trust, Gloucestershire County Council, Stroud District Council.
- Delivery Management Board – Comprised of The Ernest Cook Trust, Stroud District, Gloucestershire County Council, MHCLG, Homes England, gFirst LEP.

- Community Infrastructure Group – Representatives from community and business organisations.
- Natural Environment Group – Natural England, Environment Agency, Cotswold AONB Board
- Economy Board – gFirst LEP, local businesses
- Housing Quality Group – Registered providers, Self Build Association, Developers
- Infrastructure Delivery Group – Network Rail, Highways England, Highways Authority
- Design Quality Review Group – Direct the quality of the design and provide advice and guidance to house builders as to the standard of design that will be required. Its remit will be to encourage innovative approaches to design and environmental standards and to set the standard for the highest quality development.

The role and structure of the boards and groups will change over time. However, from the outset their purpose is to develop the overall framework for the site and enable the delivery of the first phases of development. Proposals will be developed in consultation with the groups, who will have direct and continually strengthening knowledge of the project. The groups will advise the two boards, whose role is to then shape Wisloe Green. To ensure that quality is maintained beyond the initial construction period the board may evolve into a community trust, to continue foster its own community identity.

d) Envisaged site assembly period including whether land can be drawn down in phases;

It is proposed that Wisloe Green is taken forward in phases, as set out in the housing trajectory. Each phase could potentially be brought forward through a Local Development Order which is a useful tool in the planning kit to speed up delivery.

e) Details of any part of the site that is public sector land.

The site is partly owned by Gloucestershire County Council.

You will be asked at the end of the form to provide evidence of the following:

- Land ownership plan – an overlay of the Strategic Framework Plan showing the extent of the different key land interests within the scheme boundary plan at the same scale as the Strategic Framework Plan.

You will be asked at the end of the form to provide evidence of the following:

- **Land ownership plan** – an overlay of the Strategic Framework Plan showing the extent of the different key land interests within the scheme boundary plan at the same scale as the Strategic Framework Plan.

Planning

13 a) Indicate the planning status of the site(s) for the garden community.

The site has been included within the Local Plan Review Emerging Strategy Paper as a key component of the emerging spatial strategy for delivering future growth.

b) Describe the status of the current Local Plan and if relevant provide a timescale and key milestones for its adoption.

The current Local Plan was adopted in November 2015. The Local Plan Review commenced with an issues and options consultation in Autumn 2017. An Emerging Strategy document will be subject to public consultation from 16 November 2018 to 18 January 2019. The future published timetable, set out in the Council's Local Development Scheme, envisages Reg. 18 consultation on a full draft plan in Autumn 2019; pre-submission consultation Autumn 2020; and anticipated adoption by Winter 2021/22.

c) Highlight any significant planning constraints that may affect allocation and development of the site. E.g. green belt status, flooding risk, designated heritage assets, etc.

Whilst the location of the proposed Garden village within the A38/M5 growth corridor and within close proximity to Cam and Dursley rail station and facilities in Cam and Dursley offers the very real potential for maximising the potential for sustainable transport, pedestrian and cycle improvements are needed on the A4135 as it crosses the Bristol-Birmingham rail line to the south of the site and to the north of Cam, to deliver safe and convenient access to Cam and Dursley rail station and to Cam beyond.

The site is located between the adjacent villages of Slimbridge, Cambridge and Gossington and to the north of Cam. It is important that the development of a new Garden village does not result in the actual or perceived coalescence of these settlements and sensitive use of Green Infrastructure and landscaping as well as the careful articulation of new settlement design character will be important to achieve this.

Proximity of the site to the A38 and M5 whilst offering transport advantages, also brings with it challenges in terms of potential noise and air pollution. Whilst design and layout can mitigate impacts, these can also bring with them capacity issues in terms of delivering on the objectives of maximising housing potential.

The M5 Junction 14 at Falfield to the south of the District within South Gloucestershire is currently at or nearing capacity and the level of growth proposed within the submitted West of England Joint Spatial Plan in South Gloucestershire is likely to require substantial improvements. To ensure that growth planned for within both South Gloucestershire and Stroud District future local plans can be accommodated; Highways England is supporting the principle of a comprehensive solution although a scheme has yet to be designed.

d) If any of the site is classified as brownfield, please highlight the proportion and nature of the brownfield element.

Wisloe is predominantly a greenfield site, although the development may provide some opportunities to remodel some limited areas of brownfield land within the site.

e) Briefly describe the high level planning strategy proposed to facilitate delivery of the garden community. This should include both plan-making and development management routes.

The Council is currently reviewing the Local Plan and it is proposed that the site will be an allocation within the Plan for the delivery of at least 1,500 new homes and 5 hectares of employment land by 2040. The Local Plan is due to be submitted for examination in winter 2020.

The Council will work with the promoters of the site to progress the evidence required to support the allocation and will jointly produce a framework document and draft development brief for submission with the draft Plan.

The Council is keen to explore the delivery methods which would be most appropriate for delivering this new settlement. There is an appetite within the Council for joint working with the private sector to deliver more affordable housing for local needs and capacity within the Council for delivering additional council houses, perhaps through a formal joint venture partnership or the creation of a local housing company. The Council would welcome the support the Garden Communities programme may offer in terms of building knowledge and capacity of delivery options.

Assuming that the plan is found sound by 2021, the Council will work with the promoters on the required planning applications and additional capacity to support working up the scheme will be required. From a development management perspective, the Council will create a project team to manage the planning applications through the process and will agree a planning performance agreement with the applicants.

Viability

14 a) Provide a brief market commentary on existing land values, levels of local housing demand and need, local housing affordability, and types of homes needed locally to meet need.

Existing Agricultural market land value ranges from **£. 43** per hectare assuming land has no exceptional planning hope value and vacant possession is available. Where existing Agricultural Act tenancies or similar exist, then values are affected. Market evidence suggests that large strategic urban extensions with an implementable planning permission increases the value to within the range of **£. 43** per (gross) hectare. The variables relate to the abnormal costs. Research suggests that below these level vendors may not be tempted away from the base agricultural use given the taxation and long term investment advantages as opposed to difficulties that arise from relocation reinvestment and consequential tax liability. Landowners with a desire to do so may accept a lower return although Local authorities have been required in planning legislation in recent years to take a pragmatic view of Affordable Housing requirements to meet market levels rather than risk delivery.

b) Provide a high level viability appraisal (budget statement and linked cash flow statement) for the garden community project, highlighting key infrastructure requirements, any funding gaps and how they might be filled. This should include an explanation of the assumptions that have been made.

Please see attached (appendix 1) setting out a high level appraisal of the proposed community. It is apparent that the scheme can deliver housing at market levels and be self-funding whilst providing a return to the land owners. The assumptions in the various elements of the report are self-explanatory but key points are that the Landowners have promoted the scheme to an allocation thus removing the need for the appraisal to allow for planning costs of doing so. They now wish to meet that aspiration to design the settlement in line with garden community principles as opposed to a standard volume housebuilder model. The appraisal therefore delivers a considerably higher density and what becomes evident is that a tension exists between the delivery of affordable housing and density/dwelling numbers. This may be partly met by the landowners reducing their required return for their land, but the delivery of Affordable Housing will require intervention.

c) Set out the key dependencies and phasing implications between housing and infrastructure delivery.

The financial model assumes no abnormal ground conditions, construction and infrastructure costs. It is based on planning agreement costs in line with levels derived from evidence drawn from a number of sustainable urban extensions. Such assumptions may prove not to be correct.

d) Describe any plans to access finance, including private sector investment.

The model which has been used seeks to bring together the land owners, the necessary due diligence and legal agreements, negotiation and settlement of terms, all at their own expense. The surveys, promotion, application and all supporting reports would then be funded by them to the point where they deliver an outline planning permission. At that point it is assumed a lead developer partner would be appointed who would manage and dispose of the various market elements of the site to housebuilders and commercial developers. This would enable and fund the development of the infrastructure through the scheme. The financial model demonstrates this is deliverable (based on the assumptions made) at current market levels.

Government Support

15. Please outline what aspects of the government support package set out in the prospectus you would like to draw on to support delivery of the new garden community. Please be as specific as possible and highlight how the support requested would help deliver additional or accelerated housing delivery.

Wisloe Green presents the opportunity to deliver housing at pace. The first 1,500 dwellings and 5ha of employment space accord with the emerging Local Plan (to 2040) and can be delivered within the land ownership of Gloucestershire County Council and The Ernest Cook Trust. The additional land identified (which includes third party land holdings), presents the wider opportunity to deliver a total of 4,250 dwellings and associated infrastructure. Garden Community status is critical to deliver over and above what the Local Plan will achieve and is dependent on a package of Government support, as highlighted in the Prospectus. This around delivering enhanced infrastructure, potential for accelerating delivery, capacity building to ensure a coherent community vision and design quality. Overall Wisloe Garden Village will, with Garden Community Status, deliver successful legacy planning.

Schedule of Garden Communities Place Making

The summary below highlights the outputs of the first 1,500 units, as emerging through the Local Plan and goes on to address the future prospects and support required to deliver a Garden Village of up to 5,000 dwellings, beyond the Local Plan period. Each of the opportunity areas would require Government Assistance as set out in the Prospectus – resource funding, delivery support/advice, peer learning and cross-government brokerage.

Green Infrastructure

1500 dwellings

- An acoustic bund parallel to the motorway: this is considered necessary for mitigating the proximity of the road noise and accommodates a green corridor accessible as a public open space and contributing to various engineering and ecological functions.

5000 dwellings

- A central and integrated green corridor which serves a wide variety of social and environmental purposes: High quality open space, biodiversity, community activity space, educational facility.

Housing Delivery

1500 dwellings

- A viable scheme could be delivered based on a volume house builder model.

5000 dwellings

- Allows the land owners and Stroud LPA to address new methods of housing delivery. Garden Community support will be essential to meet the new Government agenda for housebuilding and to realise the opportunities for Gloucestershire. This will include accelerating housing growth, bringing SMEs to the market and the ability to service plots and control development through a master builder approach.

Pedestrian & Cycle Movements

1500 dwellings

- Pedestrian/cyclist movement to south of the site is currently hindered by the M5 and neighbouring railway line with the existing bridge over the latter having no dedicated foot/cycleway provision. This linkage is therefore proposed to be improved to encourage greater pedestrian/cycle movement between the site and Cam & Dursley Railway Station and to the settlements beyond. To address this severance effect there is the potential to provide a pedestrian/cycle bridge adjacent to the existing railway bridge along with an upgrade of the footways either side of it. Alternatively, there is the potential to provide a high-quality foot/cycle bridge directly across the M5 to better serve the desire line between the site and Cam & Dursley Railway Station. However, a settlement of 1500 dwellings may only be able to justify the former improvement due to the higher cost of providing one to directly connect the site.

5000 dwellings

- A settlement of this scale would be able to better justify/fund a high-quality foot/cycle bridge across the M5 in order to directly serve the desire line between the site and Cam & Dursley Railway Station, Draycott Lower Cam and Dursley communities. The provision of a bridge along this alignment would help achieve a high modal shift to non-car modes of transport in order to provide a more sustainable Garden Village community whilst also providing greater benefits to the adjacent Cambridge community.

Public Transport

1500 dwellings

- Enhancement of the existing bus services that extend along the A38 and A4135 in terms of increasing their frequency and in potentially diverting certain ones through the site to provide a good quality service for the site in overall terms.

5000 dwellings

- Enhancement of existing bus services as well as the potential provision of a new bus service to provide an excellent quality service for the site in overall terms which would allow a greater level of mode shift to public transport to be achieved.

Resource Funding

Priorities for specific resource funding have been considered and are set out below

Garden Village Delivery Team

- Garden Village Delivery Staff to progress the Garden Village Programme 2018 - 2020.

Concept development

- Masterplanning, including Green Infrastructure Strategy.

Local Development Orders

- Employing LDOs to support development.

Economic Strategy

- Economic projections and review of employment land requirements.

Infrastructure Delivery Strategy

- Investigate sustainable transport measures. Accelerate negotiations with Network Rail.

Affordable Housing Delivery

- Working with Homes England to deliver a comprehensive strategy.

Surveys

- Flooding, transport, ecology, noise.

Community Forum

- Set up website, establish strategy,

Pedestrian/cycle bridge over the M5.

- Feasibility study and optioneering exercise.

Additional Evidence Checklist

These items of evidence need to be submitted to gardencommunities@communities.gsi.gov.uk

By checking or selecting 'yes' I confirm that I have emailed a copy of this evidence to gardencommunities@communities.gsi.gov.uk

<p>Location Plan - one or more plans showing the location of the proposed garden community outlined in red. It should also indicate the location of any nearby communities/development, and the boundaries of the Local Planning Authority, County Council, LEP. Include site boundary coordinates. This plan should also highlight the extent of brownfield conditions on the site if relevant.</p>	
<p>Strategic Framework Plan for the proposed garden community – this should show: the broad disposition of proposed land uses and major infrastructure proposed.</p>	
<p>Land ownership Plan – an overlay of the Strategic Framework Plan showing the extent of the different key land interests within the scheme boundary plan at the same scale as the Strategic Framework Plan.</p>	
<p>Provide a structure chart / organogram of the proposed governance, legal and financing structure for the garden community which shows the role and responsibilities of key project partners, e.g. Local Planning Authority, County Council, LEP, Government agencies, landowners, developers, etc.</p>	
<p>High level viability appraisal (budget statement, and linked cash flow with all key assumptions clearly shown)</p>	
<p>A timeline of the key milestones and dependencies between now and start on site for the new garden community.</p>	
<p>Annual housing trajectory for the garden community.</p>	
<p>Can you provide evidence of support for your proposal from the following: <i>You will be asked to answer 'Yes', 'No', or 'Awaiting Response.' If 'Yes' is selected you will need to provide details of engagement and attach relevant evidence. If 'No' or 'Awaiting Response' is selected you will need to provide reasoning.</i></p>	

a) Local MP(s)	Yes
b) Local community	No
Please provide further reasoning	
Through Local Plan process	
c) Local Enterprise Partnership(s)	No
Please provide further reasoning	
Through Local Plan process	
d) County Council (where relevant)	No
Please provide further reasoning	
Landowner & Key Promoter	
e) Neighbouring local authorities	No
Please provide further reasoning	
See Question 8	
f) For private sector led - the relevant local authority	No
Please provide further reasoning	
N/a	
g) Any other key stakeholders	No

Please provide further reasoning

Through Local Plan process



Ministry of Housing,
Communities &
Local Government



Homes
England

Assessment Guidance for Garden Community proposals

Garden Villages

Criterion	Weighting	Max Score	Score Awarded	Lead Assessor
Scale	10%	10		MHCLG GC Team
Strategic Fit	35%	35		MHCLG GC Team
Locally-led	10%	10		MHCLG GC Team
Garden community qualities	10%	10		MHCLG Design Team
Deliverability	35%	35	12	Homes England (excluding viability score)
Total		100		

Number of bid: GC040

Name of garden village scheme: Wisloe Green

Local authority: Stroud District Council

		Scale		
		1) Proposed number of homes Upload Annual housing trajectory for the garden community		
Scoring Guidance	Guide Score	Lead Assessor's commentary	Lead Assessor's score	Additional commentary
High - >7,500-10,000	5			
Medium - 5,000-7,500	3			
Low – 1,500-4,999	1			

2) If 10,000 or fewer homes are proposed, please provide details of:

a) The circumstances that you believe make the proposal suitable for consideration (refer to paragraph 5 of the prospectus.)

Paragraph 5: We will prioritise proposals for new Garden Towns (more than 10,000 homes), but will consider proposals for Garden Villages (1,500-10,000 homes) which are particularly strong in other aspects. For instance, demonstrating exceptional quality or innovations, development on predominantly brownfield sites, being in an area of particularly high housing demand, or ability to expand substantially further in the future.

Exceptional quality and being in an area of particularly high housing demand are scored elsewhere, so are not scored here.

Scoring Guidance	Guide Score	Lead Assessor's commentary	Lead Assessor's Score	Additional commentary
<p>High - The proposal demonstrates particular strength in other aspects over and above the garden community qualities, with a credible plan for how the outcome(s) will be delivered. Examples include, but are not limited to:</p> <ul style="list-style-type: none"> - Innovations e.g. catering to an ageing demographic, use of technology. - Development on 	5			

<p>predominantly brownfield sites</p> <ul style="list-style-type: none"> - Ability to expand substantially further (above 10,000 homes) in the future. Links to question 6d) 				
<p>Medium - The proposal demonstrates potential for particular strength in other aspects over and above the garden community qualities, although some of the detail on the delivery of the outcome(s) may still need to be worked through. Examples include, but are not limited to:</p> <ul style="list-style-type: none"> - Innovations e.g. catering to an ageing demographic, use of technology. - Development on predominantly brownfield sites - Ability to expand substantially further (above 10,000 homes) 	<p>3</p>			

in the future.				
Low – The proposal does not demonstrate particular strength in other aspects over and above the garden community qualities.	0			

<p>Strategic Fit</p> <p>6) a) b) c) Provide a statement on how the proposed garden community fits with local or area housing and economic plans & strategies; how it will meet anticipated population growth both within the relevant Local Plan period and beyond; and how it will address local housing affordability issues.</p> <p>5) In the case of transformational garden communities where substantive additional growth is proposed to an existing place, please outline the economic, social, and environmental outcomes you expect the proposal to achieve for the place as a whole.</p>				
Scoring Guidance	Guide Score	Lead Assessor's commentary	Lead Assessor's Score	Additional commentary
<p>High – the proposal demonstrates a high housing need and demand, with significant local affordability issues.</p> <p>It sets out an ambitious long term vision for the area, with strong evidence of how it addresses the affordability challenge and supports housing and growth in the area.</p>	35			

<p>This may include releasing more land through local plans to meet local housing need, and/or go above local housing need.</p> <p>If proposal is for a transformational community, the economic, social, and environmental outcomes are substantially positive and are judged to be achievable.</p>				
<p>Medium – the proposal demonstrates a clear housing need and demand, with moderate local affordability issues.</p> <p>It sets out a credible long term vision for the area, with some evidence of how it addresses the affordability challenge and supports housing and growth in the area.</p> <p>If the proposal is for a transformational community,</p>	21			

<p>the economic, social, and environmental outcomes will have a positive impact on the existing settlement, and are judged to be broadly achievable, although there may be a risk of delay.</p>				
<p>Low – the proposal demonstrates a relatively low housing need and demand, and local affordability issues are likewise relatively low.</p> <p>Although the long term vision for the area may be ambitious, the evidence of how it addresses the affordability challenge and supports housing and growth in the area is less strong.</p> <p>If the proposal is for a transformational community, the economic, social, and environmental outcomes will have a limited impact on the</p>	7			

existing settlement, and/or are judged to be highly challenging to achieve.				
<p>The proposal does not provide evidence about housing need and demand, or affordability issues.</p> <p>The proposal fails to demonstrate a long term vision for the area</p>	0			

<p>7 a) Set out the extent of community engagement undertaken to date in respect of the garden community. This should include any engagement with key local stakeholders, for example, Sustainability and Transformation Partnerships, LEPs, energy district network operators, etc.</p> <p>b) How do you intend to engage with local residents and stakeholders about the garden community proposal in the future?</p> <p>8. Where a proposed garden community is cross-boundary or located close to the boundaries of neighbouring authorities, describe</p>
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<p>the type and level of local authority co-operation and joint working taking place</p> <p>Upload</p> <p>Evidence of support for your proposal</p> <p>a) Local MP(s) b) Local community c) Local Enterprise Partnership(s) d) County Council (where relevant)</p> <p>e) Neighbouring local authorities f) For private sector led – the relevant local authority g) Any other key stakeholders</p>				
Scoring Guidance	Guide Score	Lead Assessor's Commentary	Lead Assessor's Score	Additional commentary
<p>High – the proposal goes beyond the statutory duty for community and stakeholder engagement to date, and sets out a credible plan for significant engagement with local residents and stakeholders in the future which continues to go beyond the statutory duty.</p> <p>The proposal demonstrates support from some key local stakeholders, e.g. MP, County Council.</p>	10			

Medium – the proposal fulfils the statutory duty for community and stakeholder engagement to date. The plan set out for future engagement likewise will fulfil the statutory duty.	6			
Low – the proposal fails to meet the statutory duty for community and stakeholder engagement to date – likely because it is at an early stage. The plan for future engagement will meet the statutory duty.	2			
The proposal fails to meet the statutory duty for community and stakeholder engagement to date and the plan for future engagement will likewise fail to meet the statutory duty.	0			

Garden Community Qualities

Locally-led – community and stakeholder engagement and support

9 a) Set out the vision and key development objectives for the proposed garden community. Highlight how the garden community will address the qualities set out in the Prospectus, and any other principles considered important.

b) Provide details of review mechanisms and tools that will be put in place to secure delivery of the quality aspects of the garden community. E.g. a design review panel.

3) If fewer than 5,000 homes are proposed, please provide details of:

The measures that will be put in place to ensure that the proposed community will be largely self-sustaining, for example in terms of movement and transport facilities, education, health, community infrastructure, and jobs.

Note: Bids that propose fewer than 5,000 homes, bidders have been asked to describe the measures that will be put in place to ensure that the proposed community will be largely self-sustaining, for example in terms of movement and transport facilities, education, health, community infrastructure, and jobs. This should be factored in when assessing relevant quality factors

Scoring Guidance	Guide Score	Lead Assessor's commentary	Lead Assessor's Score	Additional commentary
High – the vision and key development objectives set out in the proposal clearly demonstrate how the qualities detailed in the prospectus will	10			

<p>be met and embedded:</p> <ul style="list-style-type: none">a. Clear identityb. Sustainable scalec. Well-designed placesd. Great homese. Strong local vision and engagementf. Transportg. Healthy placesh. Green spacei. Legacy and stewardship arrangementsj. Future proofed <p>. The plan for putting review mechanisms and tools in place to secure delivery of the proposed quality outcomes is credible.</p> <p>These include:</p>				
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<p>Planning tools, such as Design Guidance, SPDs.</p> <p>Design assessments such as use of Building for Life 12, Design Review.</p> <p>Community engagement techniques.</p>				
<p>Medium – the vision and key development objectives set out in the proposal clearly demonstrate how most of the qualities detailed in the prospectus will be met and embedded. This must include:</p> <ul style="list-style-type: none"> a. Clear identity b. Sustainable scale e. Strong local vision and engagement f. Transport j. Legacy and stewardship arrangements <p>Although there may be</p>	6			

<p>uncertainty about how some of the qualities will be embedded, the proposal is clearly committed to the garden community qualities.</p> <p>The plan for putting review mechanisms and tools in place to secure delivery of the proposed quality outcomes is largely credible, although further work may be needed.</p>				
<p>LOW – The vision and key development objectives do not demonstrate how the key qualities detailed above will be met and embedded.</p> <p>The proposal does not evidence a clear commitment to the garden community qualities.</p>	0			

Deliverability & viability

Milestones

- 10 a) Identify the key risks to delivery of the milestones between now and start on site shown in the timeline submitted with this bid and set out the measures you will take to mitigate these risks.
- b) Provide a high-level commentary on the assumptions that have been made with respect to the housing trajectory for the garden community.
- c) Set out any opportunities that there are to accelerate this housing trajectory including any interventions that would be needed to support acceleration.

Infrastructure

- 11 a) Provide a list of the key items of infrastructure that will be required to support delivery of the garden community. Transport-related; education, health, country parks, etc.
- b) Outline any significant new or upgraded utility provision that will be required to support delivery of the garden community.

Land

12. Provide a brief commentary on the land ownership and development promotion arrangements within the proposed garden community site. This should include:
- a) Details of land owners, promoters and developers;
- b) Extent to which land is under option and any agreements in place;
- c) Details of any discussions about delivery mechanisms and models which have taken place;
- d) Envisaged site assembly period including whether land can be drawn down in phases;
- e) Details of any part of the site that is public sector land.

Planning

- 13 a) Indicate the planning status of the site(s) for the garden community.
- b) Describe the status of the current Local Plan and if relevant provide a timescale and key milestones for its adoption.
- c) Highlight any significant planning constraints that may affect allocation and development of the site. E.g. green belt status, flooding risk, designated heritage assets, etc.
- d) If any of the site is classified as brownfield, please highlight the proportion and nature of the brownfield element.
- e) Briefly describe the high level planning strategy proposed to facilitate delivery of the garden community. This should include both plan-making and development

<p>management routes.</p> <p>Viability</p> <p>14 a) Provide a brief market commentary on existing land values, levels of local housing demand and need, local housing affordability, and types of homes needed locally to meet need.</p> <p>b) Provide a high level viability appraisal (budget statement and linked cash flow statement) for the garden community project, highlighting key infrastructure requirements, any funding gaps and how they might be filled. This should include an explanation of the assumptions that have been made.</p> <p>c) Set out the key dependencies and phasing implications between housing and infrastructure delivery.</p> <p>d) Describe any plans to access finance, including private sector investment.</p>				
Scoring Guidance	Guide Score	Lead Assessor's commentary	Lead Assessor's score	Additional commentary
<p>Priority for proposals that offer a strong prospect of early delivery & a significant acceleration of housing delivery</p> <p>(i) The evidence demonstrates that either development is already underway or there is a reasonable prospect of the anticipated start of delivery on site by:</p>		<p>The site has been included in the Local Plan Review Emerging Strategy Paper which is currently undergoing consultation. The Local Development scheme envisages adoption of the new Local Plan in 2022. Housing delivery shown starting in 2026 considered optimistic</p>	<p>5</p>	

<ul style="list-style-type: none"> • 2025 • 2025 - 2030 • Post 2030 • No information provided 	10 6 2 0			
(ii) From the information provided, there is reasonable potential for an earlier start on site by: <ul style="list-style-type: none"> • 1 year or more • 6 months - 1 year • 6 months or less • No anticipated acceleration 	10 6 2 0	Gloucestershire County Council and Ernest Cook Trust core ownership/partnership and the clarity of the vision suggest potential to start earlier by 6 month to 1 year.	5	
(iii) From the information provided, there is reasonable potential for increase in the annual delivery rate by: <ul style="list-style-type: none"> • >100 units pa • 50-100 units pa • 10 - 50 units pa • No anticipated acceleration 	10 6 2 0	Ownership and recognition of potential for a range of non-competing delivery bodies suggest potential to accelerate combined with distinct areas within plan allowing separate marketing outlets and offers.	2	
(iv) Information provided about the project governance demonstrates:				

<ul style="list-style-type: none"> • An effective project governance structure is either in place or proposed that reflects the stage the project is at, demonstrates corporate involvement from local authority; & includes key partners / stakeholders to support project delivery appropriate to the stage the project is at. • A project governance structure is proposed but it may not be that effective in light of the stage the project is at or it may have low corporate involvement from the council, or not all relevant key partners are involved. • Some consideration has been given to project governance, but the bid signals that more substantial work needs to be done. • No information provided on project governance 	<p>10</p> <p>6</p> <p>2</p> <p>0</p>	<p>Clearly articulated and appropriate governance proposals. May require more detailed understanding of how this is intended to operate at each level</p>	<p>8</p>	
<p>Average score out of 10 for</p>			<p>5</p>	

above				
<p>Evidence of the strength of existing commitments & partnerships such as with master developers & land owners, and consideration of delivery models & timescales</p> <p>(i) The bid information demonstrates that in relation to the stage the proposed project is at:</p> <ul style="list-style-type: none"> • There is evidence of an effective working relationship between the council, site owners/promoters/developers in place to deliver the project; land assembly is being addressed & is unlikely to be a challenge to delivery; there is ambition & good potential for an effective delivery model or mechanism to be put in place to secure delivery in accordance with milestones & anticipated 	5	<p>Jointly commissioned vision by principle land owners Gloucestershire County Council and Ernest Cook Trust and supported by Stroud District Council. 1,500 homes wholly deliverable on that core ownership within early phases following an adaptable framework capable of expansion to 5,000 homes drawing in third party land.</p> <p>Proposed delivery through Winslow Green Development Corporation which is to be established.</p>	5	

<p>project outcomes.</p> <ul style="list-style-type: none"> • The evidence demonstrates that the key parties intend to work together to address issues and agree on potential delivery mechanisms and models to secure milestones & anticipated project outcomes. From the information provided, there appears to be either no or minimal significant challenges on land assembly to take forward the proposals • There does not appear to be any commitment to establishing an effective working relationship in place between the parties at this point to secure project milestones / anticipated project outcomes, nor any commitment to establish one. Land assembly still needs to be addressed. • No evidence provided on land assembly issues or 	<p>3</p> <p>1</p>			
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working arrangements	0			
Score out of 5			5	
<p>Degree of potential planning risk or delay to project; credible planning strategy for taking site forward to delivery</p> <p>(i) The submitted evidence demonstrates:</p> <ul style="list-style-type: none"> • All or the majority of the site is allocated in a current Local Plan and either has permission or a planning application is under preparation for all or part. • All or the majority of the site is allocated in a current Local Plan or a LP that is likely to be adopted by end 2020. • All or majority of the site is not currently allocated in a Local Plan but is in an emerging LP likely to be adopted beyond 2020. • The site is not allocated in a current or emerging Local Plan. 	<p>5</p> <p>3</p> <p>1</p> <p>0</p>	<p>The site has been included in the Local Plan Review Emerging Strategy Paper which is currently undergoing consultation. The Local Development scheme envisages adoption of the new Local Plan in 2022.</p>	1	

<p>(ii) The submitted evidence demonstrates:</p> <ul style="list-style-type: none"> • There are no significant planning constraints likely to affect the proposed development coming forward for delivery, taking into account existing or proposed mitigation measures. • The site has a number of significant planning constraints that may affect the timetable for the site coming forward for delivery BUT there is a credible planning strategy in place that has significant potential to address them. • The site has a number of significant planning constraints that may affect the timetable for the site coming forward for delivery and there is either no credible planning strategy in place to address them, or there is a high risk that the strategy may not 	<p>5</p> <p>3</p> <p>1</p>	<p>Major infrastructure issues in particular: M5 corridor and J13, Cam and Dursley Station and connections to it across the M5. These issues are capable of resolution and stakeholders are identified within the governance and delivery arrangements.</p>	<p>3</p>	
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<p>be successful.</p> <ul style="list-style-type: none"> No information is provided on planning constraints or a planning strategy 	0			
Average score out of 5			2	
<p>Infrastructure requirements are clear; there are opportunities to capture land value; there is confidence that proposals are deliverable.</p> <p>The submitted evidence and information on viability demonstrates:</p> <ul style="list-style-type: none"> A comprehensive understanding of the local context, infrastructure needs, costs of delivering the development bearing in mind the vision for the garden community, & how it will be funded. Assumptions underpinning viability are robust and substantiated. A significant majority of the costs associated with 	15			<p>Project cashflow provided together with infrastructure and planning agreement costs. Further work required on major infrastructure issues in particular. M5 corridor and J13, Cam and Dursley Station and connections to it across the M5. These issues and stakeholders are identified.</p> <p>Recommended score: 10</p>

<p>delivering the project are likely to be covered via land value capture from the proposal. Funding gaps are clear, there is credible information on how they might be addressed.</p> <ul style="list-style-type: none"> • There is reasonable understanding of the local context, infrastructure needs, costs of delivering the development bearing in mind the vision for the garden community, & how it will be funded, but some data / assumptions weak or not credible; or more work needs to be undertaken. A substantial part of the costs associated with delivering the project are likely to be covered via land value capture from the proposal. Funding gaps are clear and there is information on how they might be addressed. • The evidence 	<p>10</p>			
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<p>demonstrates either a very early stage of understanding of the local context, infrastructure needs, costs of delivering the development bearing in mind the vision for the garden community, & how it will be funded. Less than 60% of the costs of delivering the project is likely to be covered via land value capture from the proposal. There is little or no information on how identified funding gaps might be addressed.</p> <ul style="list-style-type: none"> • No information provided on potential viability 	<p>5</p> <p>0</p>			
<p>Score out of 15</p>				
<p>TOTAL SCORE FOR DELIVERABILITY</p>			<p>12</p>	

Stroud	Wisloe, situated between the A38 and M5 just north of Cam and south of Slimbridge	2,500	TBC	Gloucestershire County Council and the Ernest Cook Trust	Greenfield	No planning status					circa 2,500 dwellings, employment, a new primary school and comprehensive green infrastructure.	Gloucestershire County Council and the Ernest Cook Trust are looking at the prospects of developing a new settlement near Wisloe on land which they own, in Stroud District. The partners are working closely with Stroud DC in promoting the site through the Local Plan at this early stage. Interested in joining the Garden Communities programme.	S. 40
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Board Report 6 June 2019 - Annex B: Extracted GV score for Wisloe Green

					SITE DETAILS	SCALE	STRATEGIC FIT	LOCALLY LED	QUALITIES		
Bid no	Bid Lead	Local Authority	Scheme Name	No. of homes	Score	Score	Score	Score	Score	Total Score	Comments
GC040	Stroud District Council	Stroud District Council	Wisloe Green	5000	3	21	6	6	17	53	Free-standing

Board Paper – 6 July 2019 - Item 3 Annex D - Summary of scores against assessment criteria

GC040 Stroud DC							Bid scores moderately well against criteria. No particular exceptional qualities highlighted in the bid.
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[REDACTED]

From: s. 40(2) [REDACTED]@stroud.gov.uk
Sent: 10 October 2018 09:24
To: s. 40(2) [REDACTED]
Cc: s. 40(2) [REDACTED]
Subject: RE: Garden Communities

Follow Up Flag: Follow up
Flag Status: Flagged

s. 40(2) [REDACTED]

Out of scope

[REDACTED]

Wisloe is a proposed garden village of 1500 homes, 5 hectares of employment land, situated between the A38 and M5 just north of Cam and south of Slimbridge. The promoters are Gloucestershire County Council and the Ernest Cook Trust (an educational charity).

There are no major relationships between the two, other than both are likely to be predicated on improvements to M5 J14 and the County Council owns land within both sites.

See you on Friday.

Regards

s. 40(2) [REDACTED]

s. 40(2) [REDACTED]

Stroud District Council

Tel: s. 40(2) [REDACTED]

Fax: s. 40(2) [REDACTED]

www.stroud.gov.uk



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From: [REDACTED]@homesengland.gov.uk]
Sent: 09 October 2018 17:35
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Garden Communities

Thanks for coming back [REDACTED]
I remember the [REDACTED] Out of scope [REDACTED] from our tour but couldn't recall Wisloe although it is quite close by? Is there a relationship be the two?
Regards
[REDACTED]

Sent from my Windows Phone

From: s. 40(2) [REDACTED]@stroud.gov.uk
Sent: 09/10/2018 17:16
To: s. 40(2) [REDACTED]
Cc: s. 40(2) [REDACTED]
Subject: RE: Garden Communities

Dear s. 40(2) [REDACTED]

Thanks for your email. All is well here in Stroud, thanks.

I would like to attend the meeting in Bristol on Friday if there is room.

Stroud District Council is about to approve a consultation document on its Local Plan Review and there is likely to be at least two potential sites – [REDACTED] Out of scope [REDACTED] and Wisloe Green which may be suitable candidates for the Garden Communities fund.

Out of scope

I look forward to speaking about both projects to you and [REDACTED] on Friday and in subsequent discussions.

Regards

s. 40(2)

s. 40(2)

s. 40(2)

Stroud District Council

Tel: s. 40(2)

Fax: 01453 754945

www.stroud.gov.uk



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From: s. 40(2) [REDACTED] [\[REDACTED\]@homesengland.gov.uk](mailto:[REDACTED]@homesengland.gov.uk)

Sent: 09 October 2018 16:24

To: s. 40(2) [REDACTED]

Subject: Garden Communities

Dear s. 40(2) [REDACTED]

Hope you are keeping well ?

We are holding a Garden Communities prospectus meeting in Bristol this coming Friday.

The invitation went out via Chief Executives but thought i should contact you direct as we have had an expression of interest from s. 40(2) [REDACTED] at Peter Brett regarding

Wisloe.

Would you be interested in attending?

s. 40(2) is leading for the South West and would-be happy to provide more detail.

Regards

s.
40(2)

Sent from my Windows Phone

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s. 40(2)

From: s. 40(2) @peterbrett.com>
Sent: 09 October 2018 15:49
To: s. 40(2)
Cc: s. 40(2)
Subject: RE: Graden Village Opportunity, Stroud

s.

Many thanks for your email and the invitation to the event on Friday. I would be delighted to attend.

The contacts I am working with for Wisloe Garden Village are;

- Stroud District Council – s. 40(2)
- Out of scope

I look forward to attending the event on Friday.

Kind regards,

s. 40(2)

Associate

Direct: s. 40(2)
Mobile: s. 40(2)

Taunton



PBA has joined the Stantec family, find out more at peterbrett.com.



From: s. 40(2) [redacted]@homesengland.gov.uk>
Sent: 09 October 2018 14:56
To: s. 40(2) [redacted] peterbrett.com>
Cc: s. 40(2) [redacted]@homesengland.gov.uk>; s. 40(2) [redacted]@homesengland.gov.uk>
Subject: RE: Graden Village Opportunity, Stroud

Hi s. [redacted]

Sorry for the delay in responding.

There is a strong level of interest in the Garden Communities programme in South West and we are happy to provide advice and where appropriate hold 1:1 meetings. As you know a pre-requisite is that bids are supported by the relevant local authority, so it would be helpful to know who you are working with at Stroud. Out of scope [redacted]

Subject to the above clarification you are more than welcome to attend a Garden Communities prospectus event in Bristol on Friday (12 October). I have attached details which were sent out to LA CEO's. The event will give you an opportunity to learn more about the Garden Communities programme, which we believe could support your proposals. This will also be an opportunity to talk to MHCLG / Homes England colleagues to answer some of your specific queries. Please also feel free to forward these details to Stroud. Out of scope [redacted] colleagues.

Please RSVP to my colleague s. [redacted] with names of who will be attending.

In the meantime I have sometime tomorrow afternoon if you need to call me.

I look forward to seeing you on Friday.

Best wishes,

s. [redacted]

[redacted]
Senior Planning Manager | Land
Homes England | 2 Rivergate | Temple Quay | Bristol | BS1 6EH

s. 40(2) [redacted]



Homes England was launched by the Secretary of State on 11 January 2018. Homes England is the trading name of Homes and Communities Agency (the legal entity).

Please note that our email addresses have changed from hca.gsi.gov.uk to homesengland.gov.uk - although emails sent to our old email addresses will be forwarded for 12-months, it would be appreciated if you would update your records to reflect this change.

Please forward any Freedom of Information Requests to: enquiries@homesengland.gov.uk

PROTECT - COMMERCIAL

From: s. 40(2) [redacted] [@peterbrett.com](mailto:[redacted]@peterbrett.com)
Sent: 09 October 2018 12:10
To: s. 40(2) [redacted]
Subject: FW: Graden Village Opportunity, Stroud

s. 40(2)

Further to my email below, I wonder if you might have time for a brief discussion prior to my meeting with s. 43 [redacted] on Thursday this week?

Many thanks.

Kind regards,

s. 40(2) [redacted]
Associate

Direct: s. 40(2) [redacted]
Mobile: s. 40(2) [redacted]

Taunton



PBA has joined the Stantec family, find out more at peterbrett.com.



From: s. 40(2)
Sent: 01 October 2018 11:03
To: s. 40(2) [@homesengland.gov.uk](mailto:s.40(2)@homesengland.gov.uk)>
Subject: Graden Village Opportunity, Stroud

s. 43

I would welcome the opportunity to discuss the site with you in the context of Homes England and the Garden Communities agenda.

Perhaps you could give me a call when you are free, or I could call in at your office in Bristol?

I look forward to hearing from you.

Thank you.

Kind regards,

s. 40(2)

Associate

Direct: s. 40(2)

Taunton



PBA has joined the Stantec family, find out more at peterbrett.com.



s. 40(2)

From: s. 40(2)
Sent: 08 June 2020 15:20
To: s. 40(2)
Subject: RE: Wisloe Strategic Site, Stroud
Attachments: FW: Wisloe Strategic Site, Stroud

Hi s. 40(2)

Out of scope

Following s. 40(2) response (thanks s. 40(2) to this query from s. 40(2) at Stantec, s. 40(2) has emailed again (attached).

Is this something you can respond to her on or can I relay a message?

Thanks

s.
40(2)

Senior Development Manager
DD: s. 40(2)



Homes England
2 Rivergate
Temple Quay

Bristol
BS1 6EH

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OFFICIAL

From: s. 40(2) @homesengland.gov.uk>

Sent: 28 May 2020 14:07

To: s. 40(2) @homesengland.gov.uk>; s. 40(2) @homesengland.gov.uk>; A s. 40(2) @homesengland.gov.uk>

Cc: s. 40(2) @homesengland.gov.uk>

Subject: RE: Wisloe Strategic Site, Stroud

Hi s. 40(2)

Sorry for the delay in responding and thank you for flagging this potential opportunity.

I've cc'd s. 40(2) who is leading on a piece of work looking at failed GC bids dating back to 2018.

I'm not aware of any work done with Stroud since then. s. 40(2) and s. 40(2) should have a view on where this might sit in terms of our priorities going forward.

s. 40(2)

(2)

Senior Partnership & Business Development Manager
Markets, Partners, Places



Homes England | 2 Rivergate | Temple Quay | Bristol | BS1 6EH

s. 40(2) @homesengland.gov.uk

s. 40(2)

 @HomeslanColl

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OFFICIAL

From: s. 40(2) <[s.40\(2\)@homesengland.gov.uk](mailto:s.40(2)@homesengland.gov.uk)>

Sent: 07 May 2020 16:34

To: s. 40(2) <[s.40\(2\)@homesengland.gov.uk](mailto:s.40(2)@homesengland.gov.uk)>; s. 40(2) <[s.40\(2\)@homesengland.gov.uk](mailto:s.40(2)@homesengland.gov.uk)>; s. 40(2) <[s.40\(2\)@homesengland.gov.uk](mailto:s.40(2)@homesengland.gov.uk)>

Subject: FW: Wisloe Strategic Site, Stroud

Hi s. 40(2)

See email from s. 40(2), Stantec about potential future settlement at Wisloe, Gloucestershire. I believe this was an unsuccessful Garden Village application. Is this on the single pipeline radar?

I'm told the public/3rd sector landowners are keen to explore if a partnership with Homes England or support for the infrastructure requirements could accelerate delivery on the site of an exemplar development.

Is this something we know about or should be on the Pipeline?

Thanks

s. 40(2)

s. 40(2)

Senior Development Manager

s. 40(2)



Homes
England

Homes England
2 Rivergate
Temple Quay
Bristol
BS1 6EH

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OFFICIAL

From: s. 40(2) <[redacted]@stantec.com>

Sent: 07 May 2020 16:19

To: s. 40(2) <[redacted]@homesengland.gov.uk>

Subject: Wisloe Strategic Site, Stroud

s. 40(2)

s. 43

s. 43

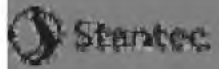
Regards

s. 40(2)

REDACTED

s. 40(2)

REDACTED



REDACTED

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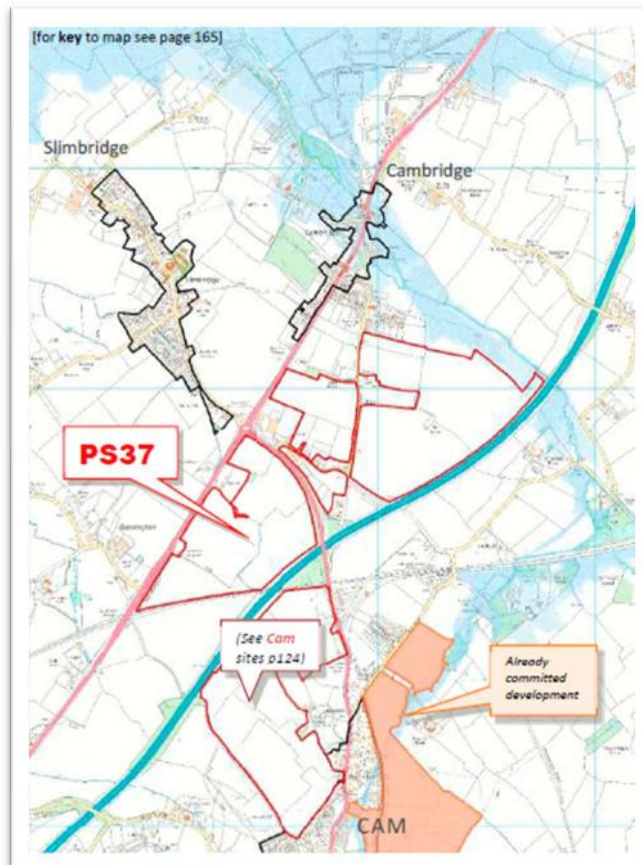
Appendix %\$

STROUD DISTRICT COUNCIL DRAFT LOCAL PLAN

TRANSPORT OBJECTIONS TO PROPOSED ALLOCATION PS37 WISLOE

1 Introduction

- 1.1 Miles White Transport (MWT) has been appointed by Slimbridge Parish Council and Wisloe Action Group to review the transport related technical information behind Stroud District Council's (SDC) decision to include site PS37 Wisloe in the current Draft Local Plan (May 2021).
- 1.2 This Note first reviews the objectives of the Draft Local Plan in a transport planning context before considering the transport issues that render the proposed allocation an inappropriate location for such large scale development. This includes reference to the SDC's technical information for the site together with more wide ranging assessments of the traffic impacts of all the proposed allocations within the SDC area.
- 1.3 Comparison is also made to the transport aspects of other potential development sites which would appear to have been discounted in favour of the Wisloe allocation. It is considered that these alternative sites are more appropriate than Wisloe in a sustainable transport context and should therefore be reconsidered.



Extract from Page 182 of the SDC Draft Local Plan (May '21)

2 National Planning Policy Framework (NPPF) February 2019

- 2.1 The NPPF sets the Government's overarching planning policies for England and how these should be applied. It provides the framework within which locally prepared plans for housing and other development (i.e., Local Plans) should be produced.
- 2.2 Under the 'Identifying Land for Homes' heading paragraph 72 of the NPPF considers larger scale developments, including new settlements, as proposed for Wisloe. The wording of this paragraph is reproduced in full below with relevant transport related references being highlighted.

72. The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

- consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;
- ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;
- set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;
- make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)³⁵; and
- consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.

- 2.3 The 'Promoting Sustainable Transport' section of the NPPF considers the transport related issues associated with development with paragraph 103, reproduced overleaf, relating to the transport principles associated with significant developments, again as proposed for Wisloe.

103. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

2.4 Relevant sections of text within these NPPF paragraphs are highlighted with these leading to the following fundamental questions:

- Will the proposed Wisloe development be supported by the necessary infrastructure and facilities?
- Will the proposed Wisloe development meet identified needs in a sustainable way?
- Will the proposed Wisloe development support a sustainable community with sufficient access to services and employment opportunities?
- Will the proposed Wisloe development be sustainable through limiting the need to travel and offering a genuine choice of transport modes?

2.5 SDC considers the answers to be yes hence the inclusion of PS37 Wisloe within the Draft Local Plan. However, this Note considers these questions in further detail and draws the opposite conclusion.

3 Relevant Policies of the Draft Stroud Local Plan

- 3.1 Before considering the Wisloe site in detail, it is appropriate to identify the various transport related issues that SDC have identified and listed within the ‘Setting the Scene’ section of the Draft Local Plan. 40 issues are identified in total with those relating to transport including “*Addressing the high level of daily commuting out of and into the District, particularly out commuting to Bristol, Gloucester, Cheltenham and Swindon*” and “*Ensuring new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development*”.
- 3.2 The 40 issues then feed into 6 priority issues one of which states:



Extract from Page 11 of the SDC Draft Local Plan (May '21)

- 3.3 The issues and priority issues then inform the ‘Core Policies’ of the Draft Local Plan with these core policies being the principal means of defining and delivering the Draft Plan’s proposed development strategy. These include (inter alia):
- Core Policy 1: Delivering Carbon Neutral by 2030 – Transport related means of achieving this are identified as locating development in locations which minimise the need to travel, and, discouraging the use of the private car by prioritising walking, cycling and public transport.
 - Core Policy 2: Strategic Growth and Development Locations – Wisloe is identified as a strategic development site to provide 1,500 residential properties and 5 hectares of employment. It is also noted that Cam, adjacent to Wisloe, is to provide a further 1,080 residential properties.
 - Core Policy 3: Settlement Hierarchy – This identifies a tiering system of settlements with respect to the level of development appropriate at individual settlements. It is noted that Wisloe, once developed, will be classified as a Tier 3a ‘Accessible Settlement with Local Facilities’.
 - Core Policy 4: Placemaking – The transport aspects relate primarily to locating development close to appropriate levels of facilities and services, reducing car dependency and improving transport choice.
 - Core Policy 5: Environmental Development Principles for Strategic Sites – In a transport context, strategic sites need to be readily accessible by bus, bicycle and foot to shopping and employment opportunities, key services and community facilities. They also need to contribute towards sustainable transport infrastructure and seek to minimise the number and distance of single purpose journeys by private cars.

- Core Policy 13: Demand Management and Sustainable Travel Measures – This policy is considered fundamental in a transport planning perspective. It identifies that alternatives to the use of the car need to be provided, existing infrastructure for all non-car modes needs to be improved, and that significant adverse effects on the transport network need to be fully mitigated. It goes on to require all development to be located where there are, or will be at the time of development, choices in the mode of transport available that minimise the distance people need to travel and that the development should not cause or contribute significant highway problems or road safety.
- 3.4 All development proposals need to be assessed against these Core Policies. Whether the proposed Wisloe allocation complies fully with the above is considered later in this Note.
- 3.5 As above, the proposed development at Wisloe will be designated as a Tier 3a settlement once developed. Such settlements are described in Core Policy CP3 as being “...*generally well-connected and accessible places, which provide a good range of local services and facilities for their communities*” and “...*benefit from their proximity and/or connectivity to higher tier settlements of transport corridors, which enables access to employment and key services and facilities elsewhere.*” They are also described as being “...*relatively sustainable locations for development.*”
- 3.6 The above comments on Tier 3a settlements give no confidence to the Council’s aim for a sustainable garden village at Wisloe as clearly there is an accepted reliance on the need to travel to access higher order services, facilities and employment opportunities. The close proximity of the A38 and M5 corridors will undoubtedly encourage a high level of car use particularly given that both roads connect to the main regional employment opportunities at Bristol in the south and Gloucester / Cheltenham in the north.
- 3.7 The ‘vision’ for the proposed new settlement at Wisloe is set out under Policy PS37 on pages 182 to 186 of the draft Local Plan. The wording of the policy identifies that the new settlement should provide approximately 1,500 dwellings and approximately 5ha of offices, B2 and B8 employment. It is noted that the use of the word ‘approximately’ does not limit the scale of the development which could therefore exceed these values with the associated increase in adverse effects.
- 3.8 It is also noted that ‘offices’ now fall under the new Class E land use classification which also includes shops, restaurants, indoor sport, health services and similar. In a planning context it may therefore be difficult to ensure that offices are delivered and that the potential employment benefits are fully realised.
- 3.9 Particular transport related requirements for the Wisloe site are identified (inter alia) as:
- A layout that prioritises walking and cycling and access to public transport over the use of the private car.

- High quality and accessible walking and cycling routes within the site and contributions and support to achieve safe pedestrian and cycle accessibility between the site and facilities in Draycott, Lower Cam, and Cam local centre, as well as to Cam & Dursley Railway Station and to link with the Cam and Dursley Greenway to the south and to NCR41 to the north.
- Contributions and support to sustainable transport measures on the A38 and A4135 sustainable transport corridors.
- Public transport permeability through the site and bus stops and shelters at appropriate locations within the development to access existing diverted and improved bus services and contributions to enhance bus service frequencies to key destinations including Cam and Dursley, Stonehouse and Stroud.
- Access improvements to Cam & Dursley Railway Station for sustainable modes and contributions towards the enhancement of passenger facilities.
- Measures to reduce car ownership, as well as car usage, including Mobility-as-a Service (MaaS) systems to provide occasional access to vehicles, bike hire schemes and public transport vouchers/incentives.
- Behavioural change measures to encourage sustainable travel through the implementation of a Travel Plan.
- Primary vehicle access from the A38 and potentially from the A4135 and additional limited vehicular access from Dursley Road, with necessary improvements to the existing highway network.

3.10 The above are laudable aims for the site but in a practical sense it is questioned whether they are deliverable or will be delivered. Similarly, it is questioned whether they are sufficiently robust to create the level of modal shift necessary to create the truly sustainable settlement envisaged by the Council and to minimise the associated traffic impact.

3.11 The supporting text to the Policy also identifies that vehicular access will be primarily from the A38 and potentially from the A4135, with necessary highway improvements consistent with the findings of the Council's Sustainable Transport Strategy and the Traffic Forecasting Report. These reports are considered below.

4 Sustainable Transport Strategy (February 2021)

- 4.1 Page 28 of the Sustainable Transport Strategy identifies the non-car travel issues associated with the proposed PS37 allocation at Wisloe. It rightly identifies the severance effects associated with the M5 and railway line corridors which, together with the lack of existing walking infrastructure, reduces the non-car accessibility of Cam & Dursley Railway Station and of Cam and Dursley themselves. The lack of car parking at the Railway Station and the need to improve station facilities and capacity is also raised as an issue.
- 4.2 The sustainability measures considered appropriate and necessary to help create a sustainable community at Wisloe are then listed and include:
- Provision of local facilities and employment within the site to increase the proportion of internalised trips, i.e., to reduce the need to travel out of the site.
 - Ensuring priority is given to pedestrian and cycle movements within the site.
 - Contributions and support to sustainable transport measures on the A38 and A4135 corridors.
 - Contributions and support to link the site to the wider pedestrian and cycle networks.
 - Improvements to the pedestrian and cycle accessibility between the site, Cam & Dursley Railway Station and Cam itself.
 - Connect with and enhance the local bus network including increased service frequency and routing through the site. This relates to both north-south services along the A38 and east-west services along the A4135 to and from Cam and Dursley.
- 4.3 Appendix C summarises the proposed package of interventions for the A38 movement corridor which in the vicinity of the proposed Wisloe allocation relate primarily to improved public transport frequencies and bus stop infrastructure. For the A4135 movement corridor, the interventions include dedicated pedestrian / cycle provision at the railway pinch-point (assumed to be a new bridge parallel to the existing), improved pedestrian and cycle access towards Cam, improved bus service frequency and infrastructure, and a sustainable 'spine' linking Wisloe, Cam and Dursley.
- 4.4 Proposed interventions for rail travel in the context of the proposed Wisloe allocation include improved pedestrian, cyclist and bus access and facilities at Cam & Dursley Railway Station. Bus interventions are again primarily improved service routings, frequencies, and bus stop infrastructure.
- 4.5 Appendix E provides a mode shift framework that summarises the anticipated modal shift away from the car that can be achieved by the proposed interventions. For Wisloe it identifies that a 10% shift can be achieved by the public transport enhancements, between 10% and 20% shift can be achieved by the improved pedestrian and cycle connections to the Railway Station and between 5% and 10% shift can be achieved by the sustainable 'spine'.

-
- 4.6 The proposed improvements to the A38 and A4135 movement corridors are identified as achieving between a 5% and 15% modal shift away from the car depending on the level of investment made. A further 5% modal shift is also considered possible by seeking to modify mobility behaviours and encourage greater use of non-car travel modes.
- 4.7 It is noted that the percentage modal shift values quoted are based on “...*professional knowledge and experience*...” (page 31). They therefore represent little more than an educated guess with no guarantee that all or any of the modal shift values will be achieved in practice.
- 4.8 It is also unclear whether the modal shift values are cumulative in nature. For instance, the maximum values for the proposed Wisloe allocation add up to 40% modal shift with the maximum values for the A38 and A4135 movement corridors adding up to a further 30%. It is considered totally unrealistic to consider a 70% modal shift as being remotely feasible. Details of the assumptions used within the resulting traffic modelling have not been fully identified and are clearly questionable.
- 4.9 Taking the benefits of a pedestrian and cycle link to Cam & Dursley Railway Station in isolation, it is difficult to see how a modal shift away from the car of up to 20% could be remotely possible. It would appear that the value has been artificially inflated to justify the location of the proposed allocation rather than any detailed passenger forecasting report having been prepared to validate the assumed value. This is discussed further later in this Note.

5 Traffic Forecasting Report (March 2021)

- 5.1 The Traffic Forecasting Report models the traffic implications of the Draft Local Plan sites and identifies the highway and sustainable transport mitigation measures considered necessary to suitably alleviate the traffic impacts of the Draft Local Plan. It allows for the measures identified within the Sustainable Transport Strategy and assumes the levels of modal shift identified within that document can be and will be achieved.
- 5.2 The vehicle trip rates used for the residential element of the site are identified in Table 5.3 of the report under the Cam and Dursley area. Comparison to the trip rate values used for the other assessment areas raises concerns in that the vehicle arrival rates are the lowest value of all the areas in both the AM and PM peaks and the second lowest vehicle departure rate in the PM peak. This is difficult to comprehend given the location of the site in respect to the highway network and existing non-car travel opportunities particularly given that the vehicle departure rate in the AM peak is the highest of all the area values.
- 5.3 Trip rates associated with the employment elements of the Draft Local Plan have been assumed to be uniform across most sites which again makes no allowance for the actual location of the proposed Wisloe site or its existing / proposed sustainable transport credentials.
- 5.4 Getting the vehicle trip rate assumptions correct from the outset is clearly a key element of the traffic modelling exercise as it impacts on all other aspects of the report and its associated conclusions. As currently written, the accuracy of the trip rate values used can be questioned.
- 5.5 The residential trip rate values identified within the Traffic Forecasting Report have been discounted by 10% to allow for internalisation of trips. This is on the assumption that some of the future residents of the Wisloe development would likely work within the employment element of the proposals and therefore not create vehicle trips on the off-site highway network.
- 5.6 The concept of trip internalisation is acknowledged but again there is no justification or evidence provided of the accuracy of the 10% value used. It is also interesting to note that the internalisation factor only comes into effect when the employment element within a draft allocation is greater than 5 hectares. This ‘trigger’ is not explained or justified and draws into question whether the trigger was derived to suit the proposed 5 hectares of employment at Wisloe, or whether exactly 5 hectares of employment was included such that the trip internalisation factor would apply within the calculations.
- 5.7 Further doubt on the appropriateness of the internalisation factor can be raised through reference to the type of employment likely to be delivered on the proposed Wisloe site. Predicted employee numbers for the employment element have been derived by assuming the Gross Floor Area of the buildings represents 40% of the 5 hectare site area and that there is an equal split of offices, B2 and B8 land uses, i.e., 6,667m² of each.

-
- 5.8 Assumed employees per 100m² values are provided in Table 4.5 of the Traffic Forecasting Report and are 10.07 for offices, 3.03 for B2 and 1.45 for B8. This suggests that the employment element of the proposed Wisloe allocation could create approximately 970 jobs.
- 5.9 It is difficult to see how the employment element could be brought forward at precisely the floor areas assumed. This leaves the possibility of a greater proportion of say B8 land uses which would result in less jobs and less internalisation. Alternatively, if there was a greater proportion of offices then there would be more jobs and the potential for higher internalisation. The potential benefits of this would however be more than offset by the higher trip numbers / traffic impact associated with the non-internalisation traffic.
- 5.10 The on-going Covid pandemic is likely to have a long lasting effect on demand for new office space as more employers and employees take advantage of home working opportunities. In turn this is likely to limit the deliverability of new office space meaning that the employment element of the proposed Wisloe allocation is likely to favour more of the B2 and B8 land uses than assumed within the traffic forecasting. This is particularly the case given the significant increase in on-line shopping and home deliveries which is leading to significant demand for warehousing and distribution facilities. Less job creation equates to less trip internalisation particularly given that the 10% reduction is applied to the residential vehicle trip numbers.
- 5.11 It is acknowledged that assumptions need to be made but those included within the Traffic Forecasting Report are very coarse and should be refined. As mentioned previously, the accuracy of the assumptions used within the traffic modelling are key and a slight inaccuracy could have a significant knock-on effect on the subsequent junction capacity assessments and the mitigation requirements identified.
- 5.12 Notwithstanding the accuracy of the trip rates, the internalisation factor and the modal shift reductions associated with the Sustainable Transport Strategy, Table 5.6 of the Traffic Forecasting Report still identifies the proposed Wisloe allocation as generating 988 new two-way vehicle trips in the AM peak hour and 820 new two-way vehicle trips in the PM peak hour. Clearly, the site will be a very high traffic generator and not the sustainable settlement envisaged within the Draft Local Plan.
- 5.13 Table 6.3 of the report summarises the junction improvements required to mitigate the impacts of background traffic growth and the Draft Local Plan allocations. 30 schemes are identified that vary between optimisation of existing signal timings through to significant improvements to all three Motorway junctions within the District. Local to Wisloe, the only improvement identified relates to widening the northbound approach to the A38 / A4135 roundabout. Local knowledge identifies this junction as already operating with considerable queuing and delay in the highway peak hours so it is difficult to see how the addition of a further 800 to 1,000 two-way vehicle trips in the peak hours from the Wisloe proposals could not have anything but a significant 'severe' impact on the operation of the local highway network.

-
- 5.14 The absence of such an impact suggests that the traffic model assumes all Wisloe traffic to and from the north will access the A38 to the north of the existing roundabout and similarly, all Wisloe traffic to and from the south will access the A38 to the south of the existing roundabout. In practice it is extremely unlikely that development traffic will route in such a simplistic manner which again draws into question the accuracy of the modelling assumptions.
- 5.15 The Traffic Forecasting Report relies on a significant number of assumptions that themselves rely on little more than judgement and experience. The results must therefore be considered as a 'best guess' of what might happen rather than an accurate forecast of what will happen. Most of the assumptions used have also taken a best case view on achieving modal shift, trip internalisation and similar rather than what should be considered a more realistic view.
- 5.16 Delivering the off-site infrastructure improvements identified by the Traffic Forecasting Report (irrespective of the assumptions used) will be an absolute necessity if the Council are to deliver on the Draft Local Plan. At present there is no guarantee that these improvements will be delivered in a timely manner particularly given the complexities of the M5 junction improvements that form a fundamental part of the mitigation strategy.
- 5.17 Within all the traffic modelling work undertaken to support the Draft Local Plan there is no mention of the A38 corridor being the signed diversionary route should the M5 be closed for any reason between Junctions 13 and 14. It is known from recent experience (24th April 2021) that significant queues and delays of between four and five hours can occur on the A38 when the Motorway is closed. The draft allocation at Wisloe would significantly increase traffic flows along the A38 corridor and therefore further slow the passage of diverted vehicles when the Motorway is closed. This significantly undermines the effectiveness of the signed diversionary route and could in turn encourage rat running via inappropriate country lanes with the inherent road safety issues this would create.

6 Discussion

6.1 The previous sections have provided an overview of the transport issues included within the policy documents that support the Draft Local Plan. The following provides a more detailed discussion of various points where the practicality and deliverability of some of the proposed transport measures is questioned.

Likely Usage of Cam & Dursley Railway Station

6.2 Part of the Council's rationale for allocating development at Wisloe is the proximity of Cam & Dursley Railway Station and the potential for it to provide non-car related journeys to higher order settlements. However, it is considered that the benefits of the proximity of the Station have been significantly over played within the Draft Local Plan and that any increase in patronage from the proposed Wisloe development will do little to offset the wider traffic impacts of the site.

6.3 National Census 'Method of Travel to Work' data for those Census areas within Cam that are closest to the Railway Station are attached as **Appendix A** of this Note. This identifies an average 1.39% usage of the train for work related journeys. The Sustainable Transport Strategy identifies that rail use has grown by approximately 22% since the 2011 Census date which means rail use is currently likely to be approximately 1.7%. Applying this percentage to the 1,500 properties envisaged at Wisloe identifies that only approximately 25 households would travel to work by train.

6.4 This is a small number and in no way justifies locating a major development in open countryside just because it is relatively close to a Railway Station.

6.5 There is no reason to believe that future residents of a development at Wisloe would be more likely to use the train than those residents of Cam who currently live within a similar distance of the Station. The only way that a step change in rail use could be delivered would be through the introduction of significant improvements to the frequency of rail services that call at the Station. At present services are limited to broadly an hourly frequency in both directions with services to Gloucester and Cheltenham (and occasionally beyond) to the north and to Bristol Parkway, Bristol Temple Meads, Bath and beyond to the south.

6.6 This level of service means there is a limited choice of train times for those with standard working hours in the higher order settlements of the region and the attractiveness of the train for commuting purposes is therefore relatively low.

6.7 For longer distance train journeys to say London, local residents regularly opt to drive to Stonehouse to catch the direct train to London Paddington via Swindon. This avoids the need to change at Bristol Parkway and allows for much quicker overall journey times. Even with more frequent services from Cam & Dursley Station these local car trips to alternative stations are likely to continue as otherwise there will always be the need to change trains, the risk of missed connections and longer journey times.

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- 6.8 In a similar way, it is known that some residents from outside of the Cam and Dursley area drive to the Railway Station to catch the train purely because of the availability of free car parking. This allows passengers to avoid congestion on the car journey to alternative Stations and the car parking charges that apply at those Stations. The usage of the car park at Cam & Dursley Station cannot and should not be considered representative of purely local demand for rail services.
- 6.9 It is noted that the Gloucestershire County Council Local Transport Plan includes numerous aspirations to deliver rail improvements, but the Council have little power to do so as it is Network Rail and the train operating companies that control the lines and the services that operate on them. This is why the Local Transport Plan prefaces most of these rail based aspirations with comments such as “GCC will engage with the rail industry to...” There can clearly be no guarantee that increased rail services will be delivered irrespective of whether Wisloe is developed or not. The ability to deliver is not with the Council(s) or the developer.
- 6.10 There are currently a total of 108 trains per day on the line through the Station comprising a mix of slow freight traffic, slow stopping passenger services that call at Cam & Dursley Station, and Cross-Country express trains potentially travelling at up to the 100mph maximum line speed. It is a busy line with limited opportunities to introduce new train paths for additional slow moving stopping services. Considerable investment would likely be required by Network Rail to increase the line speed, update the signalling, introduce faster accelerating trains, and potentially electrify the line before any significant improvement in service frequency from Cam & Dursley Station could be delivered.
- 6.11 Network Rail have no planned improvements for the route through the local area within their current Control Period 6 Strategic Plan.
- 6.12 Even if improvements to service frequency were forthcoming and say a 30 minute frequency could be provided, there is no guarantee that there would be a significant increase in rail patronage on the journey to and from work. Rail use is not only linked to the frequency of service available from the origin Station but also to where in the destination Town or City an employee works. If for instance a long walk or secondary bus journey is required between the destination Station and the workplace, an employee may choose to drive irrespective of the frequency of rail service available. Similarly, much depends on whether there is free workplace parking available at the workplace as this will likely encourage employees to drive rather than use sustainable modes.
- 6.13 The above clearly demonstrates that just because the draft Wisloe allocation is close to Cam & Dursley Railway Station does not in itself make the site sustainable. There would continue to be a significant reliance on the use of the private car for all trip purposes even if train service frequency could be improved. Stroud District Council have no ability to implement such improvements to rail services and neither would the developer of the site should it come forward.

Delivery of Direct Pedestrian / Cycle Link to Railway Station

- 6.14 The Draft Local Plan and Sustainable Transport Strategy also make great play of the potential to deliver a direct pedestrian and cycle route between the Wisloe site and Cam & Dursley Railway Station. The Sustainable Transport Strategy identifies that this measure alone could deliver a 10 to 20% modal shift away from the car and to the train. It is not clear whether this equates to a 10 to 20% increase in the proportion of people using the train, i.e., the 1.7% identified above increasing to 2.0%, or whether this equates to a 10 to 20% reduction in the 800 to 1,000 peak hour car trips identified in the Traffic Forecasting Report. The former could potentially be believed but based on the discussion above, the latter is considered completely unrealistic.
- 6.15 It is easy to show an indicative line for a bridge on a potential masterplan for the site particularly when considering matters only in two dimensions. This in effect is all that the Council and the promoters of the site have done to date. However, this approach takes no account of the practicality of delivering the route which is considered further below.
- 6.16 The proposed Wisloe allocation is an awkward shape and covers two large areas separated by the A4135 through the middle. Even with a direct link to the eastbound platform at the Railway Station, the walking or cycling distance would be up to approximately 1.5km (20 minutes) from various parts of the site. This may discourage some walking trips and not everyone is willing or able to cycle.
- 6.17 The quality of a walking / cycling route is also a key factor when choosing whether to walk or cycle irrespective of the trip purpose. In this case the proposals envisage a bridge over the M5 Motorway which is on an embankment of approximately 1m height at the most likely crossing point. This means that the deck of the bridge would need to be approximately 7m above the existing ground levels of the site with approach ramps of approximately 140m length on either side to provide appropriate gradients. The overall length of the bridge structure would therefore be approximately 350m.
- 6.18 Incorporating such a bridge and its approach ramps into the masterplan of the Wisloe site would be challenging particularly where the desire must be to minimise the walking and cycling distances to all parts of the site. The flat nature of the surrounding area also means that the bridge structure would dominate the local area visually which would be further exaggerated by the requirement for street lighting. It is not clear whether the landscape impact of the proposed bridge has been considered by the Council when preparing the Draft Local Plan but, if not, doubt must be cast on the appropriateness of such a domineering structure in a generally flat location.
- 6.19 It is likely that the required height and length of the bridge would leave some if not all pedestrians and cyclists feeling exposed and vulnerable while simultaneously being hemmed in by the required parapets on either side. In turn, this may lead to pedestrians and cyclists avoiding the route or simply reverting to use of the car leading to a significant reduction in the perceived accessibility of the site to and from the Station.

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- 6.20 The extent of the proposed allocation (see extract on Page 1 of this Note) is such that the Motorway represents its southeast boundary. The ability to cross the Motorway therefore needs to be agreed with Highways England whose approval cannot be guaranteed. Similarly, there is a gap of approximately 350m between the Motorway and the Railway Station which does not form part of the draft allocation. The ability to construct a bridge and connection over this third party land cannot be guaranteed. A direct connection to the Railway Station itself is also reliant on the approval of Network Rail and the Train Operating Companies so again this cannot be guaranteed.
- 6.21 As previously stated, it is easy to show the intention for a new pedestrian and cyclist bridge linking to the Railway Station on a plan, but when the practicalities of such a link are considered, it becomes clear that it will be difficult, if not impossible to deliver. The Wisloe proposals appear to be predicated on its delivery which clearly cannot be guaranteed. The 10 to 20% modal shift assigned to its delivery therefore also cannot be relied on with the site by default reverting back to being reliant on the private car with the additional traffic impacts that will arise.

Delivery of Sustainable 'Spine' Linking to Cam and Dursley Town Centres

- 6.22 The Sustainable Transport Strategy identifies the potential improvement of pedestrian, cycle and public transport infrastructure and frequency along the A4135 corridor between the proposed Wisloe allocation, Cam and beyond to Dursley. The Strategy identifies that these measures are predicted to combine to deliver approximately 15 to 20% modal shift away from the car.
- 6.23 As stated previously, this level of modal shift is based purely on the experience and judgement of the report's authors and is not evidenced based. Stated preference and revealed preference questionnaire surveys should have been undertaken amongst existing local residents to identify their willingness (or otherwise) to switch from car to the potential non-car alternatives. This could then be used as a proxy for future residents of the proposed allocation allowing more informed values for modal shift to be used within the traffic modelling. Without this, the assumed modal shift values that have been used are considered extremely ambitious and unlikely to occur in practice.
- 6.24 Local Transport Note (LTN) 1/20: Cycle Infrastructure Design, identifies the Government's guidance on the planning and design of cycle routes. It identifies that routes should be coherent, direct, safe, comfortable and attractive. There should also be consistency along their length and priority given to the cyclist wherever possible.
- 6.25 Having reviewed the design guidance, the A4135 speed limits, and the intended level of usage suggested by the predicted modal shift, it is considered that the most appropriate design for the route would be a two-way dedicated cycle path with a 3m width beside a dedicated 2m footway. A buffer of 0.5m should also be provided to separate the cycle path from the edge of the A4135 carriageway. These design parameters therefore require at least a 5.5m width to allow their introduction. The traffic flows on the A4135 now and in the future are such that reassignment of existing carriageway space to pedestrians and cyclists is not possible therefore the full 5.5m width would need to be provided to the side of the existing carriageway.

- 6.26 The above raises the obvious question: is this width available within the existing highway boundary? The answer is no.
- 6.27 Heading southeast from the Wisloe Road junction there is currently a verge width of approximately 3m on the northern side of the A4135 carriageway between the kerb line and an Armco safety barrier (see photograph below).



- 6.28 This barrier is provided to prevent vehicles from going down the highway embankment as it increases in height towards the overbridge of the M5 Motorway. As such, it should not be removed or relocated. This means the best that could be achieved in terms of pedestrian and cycle improvements along this section would be a 3m shared use path with no buffer strip to the carriageway edge.
- 6.29 LTN 1/20 identifies the use of shared use paths for pedestrians and cyclists as a last resort as they are not favoured by either pedestrians or cyclists particularly when flows are high. Actual conflict may be rare, but the interactions between people moving at different speeds can be perceived to be unsafe and inaccessible, particularly by vulnerable pedestrians. This adversely affects the comfort of both types of user as well as directness for the cyclist. Provision of a simple 3m shared use path would therefore not be attractive and would be unlikely to deliver the modal shift predicted by the Sustainable Transport Strategy. Delivery of the more appropriate 5.5m wide pedestrian and cycle facilities identified previously would require the whole embankment to be widened which is considered extremely unlikely to occur in practice.

- 6.30 Continuing southeast there is a major constraint where the A4135 crosses over the M5 Motorway. Here, the existing footway width is approximately 2m between the rear of an Armco barrier and the parapet of the overbridge. To provide continuity of an appropriate high standard pedestrian and cycle route would, as a minimum, require construction of a new footbridge parallel to the existing road bridge. This could be possible, but much depends on the extent of the adopted highway and the requirements of Highways England when bridging over the Motorway. Its delivery cannot be guaranteed.
- 6.31 A similar situation applies where the A4135 bridges over the railway line. The carriageway narrows to approximately 6.0m at this point with the existing footway provision reducing to just 500mm (see photograph below).



- 6.32 This is a significant pinch point and one that would need to be overcome if greater use by pedestrians and cyclists is to be achieved. The only realistic option in this regard would be to construct a free-standing pedestrian and cycle bridge on the eastern side of the existing road bridge. Again, this could be possible, but much depends on the extent of the adopted highway, any limitations created by the potential need for third party land and the requirements of Network Rail when bridging over the railway. Its delivery cannot be guaranteed.

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- 6.33 Verge widths south towards Cam are variable and are not sufficient to fully accommodate the 5.5m width required for a high standard pedestrian and cycle route. Difficulties would also arise where the route crosses side road junctions such as Box Road and beyond towards Cam where residential properties are tight to the back of the footway and where driveway accesses and on-street parking would prevent any significant improvements.
- 6.34 Taking the above into account, it is considered that the ability to deliver anything other than relatively minor pedestrian and cycle improvements along the A4135 corridor is limited. Minor improvements would clearly not deliver the high levels of modal shift envisaged by the Council with the subsequent increase in car use and associated traffic impact. The financial cost of providing appropriate improvements to pedestrian and cycle links beside the A4135 would likely significantly affect the overall viability of the project and even then, the level of modal shift predicted cannot be guaranteed.
- 6.35 If it assumed that the high quality pedestrian and cycle links envisaged by the Draft Local Plan can be provided, they would still be difficult to access from some parts of the proposed Wisloe allocation. The site is effectively two separate sites either side of the busy A4135 road corridor with pedestrians and cyclists from the southern side being required to cross to the northern side to access the proposed Local Centre, proposed Primary School, proposed bridge to the Railway Station and the proposed sustainable travel corridor to Cam and Dursley.
- 6.36 The A4135 is on an embankment that begins to increase in height from the Wisloe Road junction up to the bridge over the Motorway where it is at a considerable height above the adjacent natural ground level. As a minimum, a signal controlled crossing would be required to facilitate safe pedestrian and cycle movements over the A4135 with this needing to be provided close to the Wisloe Road junction where the road levels are broadly the same as the natural ground levels. A crossing at this point would take most residents of the southern part of the development out of their way if they are then looking to head east towards the Railway Station, Cam or beyond. Longer walking or cycling distances make use of such non-car modes less likely and undermine the sustainable travel principles sought to be delivered by the proposed allocation.
- 6.37 It may be possible to create a subway through the A4135 embankment closer to the Motorway and more on the desire line towards the Railway Station and the link to Cam and Dursley however this would come at considerable cost and may not be viable in the context of the wider development. There would also be a level difference between the subway and the existing bridge / proposed pedestrian and cycle route over the Motorway that would require considerable ramps to ensure accessible gradients which again would increase the walking and cycling distance involved.
- 6.38 Improvements to public transport infrastructure and services are also proposed to form part of the A4135 'sustainable spine'. Improved bus stop infrastructure can help encourage public transport usage, but it is the frequency of service and the available routings that are the key element. Other than a bland statement to increase the number of services along the corridor there is no detail on exactly what might be achieved.

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- 6.39 The existing No. 60 and its route variants provides a two hourly frequency of journey between Dursley and Gloucester while the existing No. 61 provides an hourly frequency of bus between Dursley and Stroud. Significant improvements to frequency would be required for any material modal shift to be achieved.
- 6.40 Additional routes would also be required to increase the range of destinations accessible by bus including south along the A38 corridor where no buses currently operate. The only option for bus travel to and from Bristol at present is the No. 62 from Dursley direct to Bristol which offers six buses per weekday. Use of this service first requires a journey by whatever mode into Dursley and then a 90 minute journey time to Bristol. This is clearly not an attractive travel option. New services can of course be pump primed by new development however the subsidy period is often limited meaning there can be no guarantee that the services will remain viable in the longer term.
- 6.41 The Draft Local Plan identifies noble aspirations regarding increasing bus services and their usage but again there can be no guarantee that these will be provided or that they will deliver the modal shift envisaged. As with most of the transport elements associated with the Draft Local Plan and its supporting documentation, the strategy for Wisloe is not based on evidence but merely the experience and judgement of the authors of the relevant reports.
- 6.42 It is maintained that the level of modal shift assigned by the Sustainable Transport Strategy is significantly over-estimated particularly given the issues identified above. Without evidence of the achievable modal shift, the Draft Local Plan represents little more than wishful thinking in terms of the sustainability of the proposed allocation at Wisloe.

Travel Distance to Local Facilities and Amenities

- 6.43 The Draft Local Plan identifies that the allocation at Wisloe should provide housing, employment, a Primary School, a Surgery and a Local Centre providing retail and community facilities. These are aspirations for the site and delivery of all that is anticipated cannot be guaranteed.
- 6.44 For instance, small scale GP Surgeries tend not to be viable and frequently consolidate into larger Medical Centres where the respective Partners can benefit from economies of scale. A small Surgery within the site cannot therefore be guaranteed. This is tacitly accepted on page 73 of the Infrastructure Delivery Plan (2021) which states *“In deciding to build a new surgery resulting from new housing developments, the preference is generally not to build lots of new small surgeries, which operationally become expensive to run compared to usage and maintaining workforce over multiple sites...”*
- 6.45 Similarly, any retail offer is likely to be limited by the scale of the allocation and the likely footfall it will generate. Anything more than a small convenience store is considered extremely unlikely. The self-containment of trips when accessing services, facilities and amenities is therefore likely to be small with future residents still primarily reliant on the existing services, facilities and amenities available in the wider local area, i.e., Cam and Dursley.

6.46 The Table below identifies the location of key services, facilities and amenities and the walking distance to these from the centre of the proposed Wisloe allocation. These are also related to the preferred maximum walking distances recommended by the Chartered Institution of Highways and Transportation (CIHT) guidance document 'Providing for Journeys on Foot'.

Service, Facility or Amenity	Walking Distance	CIHT Guidance
Town Centre (High Street Rbt, Cam)	2,500m	800m
Post Office (Noel Lee Way)	2,525m	1,200m
Supermarket (Tesco, Noel Lee Way)	2,575m	1,200m
Dental Surgery (Chapel Street)	2,600m	1,200m
Pharmacy (Boots, Chapel Street)	2,650m	1,200m
Medical Centre (Fairmead)	2,700m	1,200m
Vale Hospital (Lister Road)	4,100m	1,200m
Secondary School (Rednock)	4,575m	2,000m
Leisure Centre (The Pulse, Dursley)	4,930m	1,200m
Library (Cotswold Way, Dursely)	5,100m	1,200m

6.47 The above identifies all the day to day destinations listed as being more than double the preferred maximum walking distance recommended by the CIHT. The likelihood of future residents of Wisloe walking to and from these destinations is therefore small.

6.48 It is acknowledged that 5km is normally taken as an appropriate cycling distance and that most of the destinations identified are within this distance. However, doubt has previously been cast on the ability to deliver high standard cycle infrastructure along the A4135 corridor without which there is likely to be only limited cycle use.

6.49 Similarly, public transport enhancements could be delivered by the proposed development but again there is no guarantee that these will be of a level to encourage the significant modal shift required to make the Wisloe site truly accessible and sustainable.

6.50 It should be noted that the Rednock Secondary School is approximately 4,575m walking distance from the centre of the proposed Wisloe site. This equates to 2.84 miles, i.e., less than the 3 miles above which free bus travel applies to students. It is therefore likely that most students will be dropped off and picked up by their parents which will further increase traffic flows particularly in the worst case morning highway peak hour.

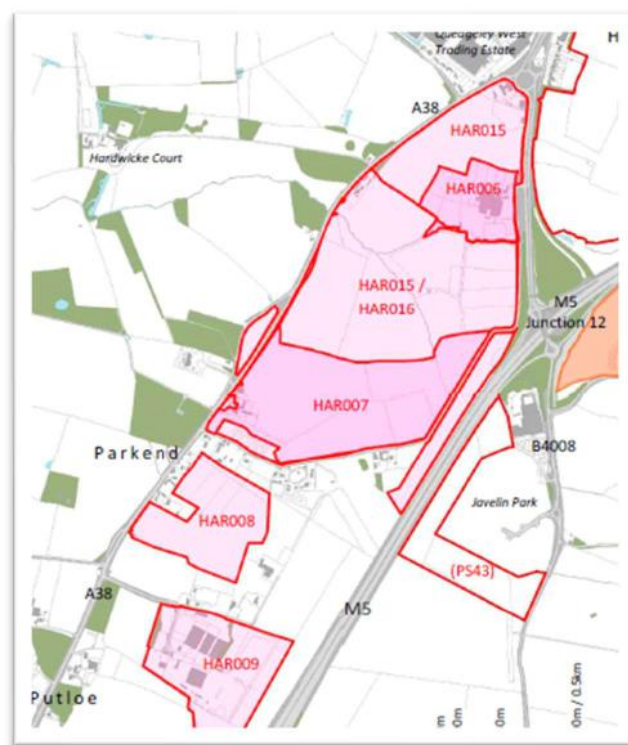
6.51 Rednock School is also at capacity which may result in Secondary Schooling having to be provided further afield with the resultant increase in travel distance and associated vehicle emissions.

7 Comparison with Potential Alternative Allocations

7.1 In October 2020, Stroud District Council undertook a public consultation on ‘Additional Housing Options’ with this including the potential for two other large scale development sites. These were Potential Growth Point (PGP) 1: Whitminster, and PGP 2: Moreton Valence / Hardwicke. The site areas are shown on the extracts from the consultation document below.



PGP1: Whitminster



PGP2: Moreton Valence / Hardwicke

- 7.2 At Whitminster the Council identified the potential for 2,250 dwellings, 13 hectares of employment, a local centre, primary school, community facilities and open space. At Moreton Valence / Hardwicke the Council identified the potential for 1,500 dwellings, employment land, a local centre, primary school, community facilities and open space. Both sites are broadly similar in scale and provision to the proposals for Wisloe.
- 7.3 The current version of the Draft Local Plan has not included the Whitminster or Moreton Valence / Hardwicke sites as potential allocations. It has instead continued to promote a new settlement at Wisloe despite this being in a less favourable location in transport planning terms than both alternatives.
- 7.4 The potential alternative allocations were identified primarily in response to the Government’s proposed increase in housing numbers which was later dropped. They were therefore considered to be potential ‘additional’ sites and were subject to a separate consultation rather than as part of the wider Local Plan Review consultation. It is not clear how thoroughly they were assessed in a technical context particularly in direct comparison to other sites such as the currently proposed allocation at Wisloe.

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- 7.5 One thing that is clear however is that undertaking a separate public consultation for these two sites will have focussed local objections which may in turn have influenced the position of the Council. Including the sites from the outset would have allowed for more detailed technical assessments and comparisons to be made and for the public consultation to have been undertaken in a more balanced manner.
- 7.6 It is considered common sense to locate additional residential development close to existing large settlements as this serves to minimise average travel distances to work and when accessing local facilities and amenities. It also increases the opportunity to use more sustainable modes of travel on such journeys and reduces the scale and cost of the accessibility interventions necessary to make the location sustainable. The interventions that are then considered necessary are much more likely to be delivered.
- 7.7 Draft Local Plan Strategic Objective SO4: Transport and travel, identifies that SDC will seek to *“reduce CO₂ emissions by using new technologies, active travel and/or smarter choices working towards a more integrated transport system...”* Excellent ambitions, however, the quickest and easiest way of reducing CO₂ emissions is to reduce the distance people need to travel by locating development in the appropriate place.
- 7.8 The Draft Local Plan covers this within the ‘Priority Issues’ section where it seeks to ensure *“...new development is located in the right place, supported by the right services and infrastructure to create sustainable development.”* It also continues with the aim of *“...concentrating housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure...”* and only then identifying the potential for new sustainable settlements.

Census Data

- 7.9 The significance of location in a travel context can be identified through reference to National Census ‘Distance Travelled to Work’ and ‘Method of Travel to Work’ data. Relevant extracts from the Census are attached as **Appendix B** and are discussed below.
- 7.10 The relevant Super Output Layers (lower level) have been identified for the proposed PS37 Wisloe allocation, and also for the discounted PGP1 Whitminster and PGP2 Moreton Valence / Hardwicke sites. The average travel distance to work values are shown to be 21.5km for Wisloe, 18.8km for Whitminster and 17.4km for Moreton Valence / Hardwicke. The average travel to work distance for Wisloe is therefore 14.4% higher than that at Whitminster and 23.6% higher than that at Moreton Valence / Hardwicke.
- 7.11 These census outputs demonstrate the relationship between proximity to larger, higher order settlements where employment opportunities are highest, and the average distance travelled to work. Moreton Valence / Hardwicke’s proximity to Gloucester leads to the shortest average distance travelled, Whitminster’s proximity to Stroud / Stonehouse leads to the next shortest average distance travelled while Wisloe’s proximity to Cam / Dursley leads to the longest average distance travelled. This follows the Gloucester, Stroud / Stonehouse, Cam / Dursley settlement size and associated hierarchy of available employment opportunities.

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- 7.12 The increased journey distances also reflect Wisloe's position on the A38 corridor approximately mid-way between Motorway junctions. Residents of all three potential sites are likely to be travelling to broadly the same destinations with many using the M5 Motorway to do so. Whitminster and Moreton Valence / Hardwicke are both close to Motorway junctions and therefore have easier access to the Motorway and the wider Strategic Road Network.
- 7.13 Locating development at Moreton Valence / Hardwicke, and/or to a slightly lesser degree at Whitminster, would therefore clearly reduce the travel distance to work and the associated CO₂ emissions when compared to Wisloe. This would comply more appropriately with the travel related policies and objectives of the Draft Local Plan.
- 7.14 Both Whitminster and Moreton Valence / Hardwicke benefit from significant employment opportunities within approximately 2 to 2.5km of the sites, i.e., at the Industrial Estates and Business Parks to the west of Stonehouse, and at Quedgeley and Javelin Park respectively. Development at Wisloe would be a similar distance from employment in Cam however the scale of the local employment opportunities available in Cam is very much smaller than those available from both the Whitminster and Moreton Valence / Hardwicke sites.
- 7.15 The Stonehouse Neighbourhood Plan identifies that Stonehouse contains almost a third of the District's commercial floor space. It states: *"The proximity to the M5 (Junction 13), A419 corridor and residential areas combine with the quality of premises to make Stonehouse a significant location for creating and sustaining jobs and economic prosperity at a local, district and county level and it is identified as an 'employment hotspot' in the Stroud Local Plan."* Locating residential development at Whitminster and close to this major employment opportunity will clearly serve to minimise travel distances and enable the use of more sustainable modes of travel.
- 7.16 It is noted that Table 5 of the Draft Local Plan identifies further strategic employment sites to be provided at Quedgeley (5 hectares) and Javelin Park (27 hectares) both close to Junction 12 of the M5 Motorway and both close to the Moreton Valence / Hardwicke alternative site. A further 15 hectares of strategic employment is also identified at Stonehouse close to Junction 13 of the M5 Motorway and the Whitminster alternative site. The logical location for new residential development when seeking to reduce travel distances and emissions must be close to these existing and proposed major employment areas which clearly favours Whitminster and Moreton Valence / Hardwicke over the current draft allocation at Wisloe.
- 7.17 Data on the method of travel to work is also available through reference to the National Census. Logic suggests that the closer a potential development is to a larger, higher order settlement, the more likely it is that opportunities to use non-car modes of travel will already be available or can be more easily delivered.
- 7.18 The Census data in this case has been adjusted to remove those who currently work from home or are not employed so that only those who actually travel to work are included in the calculations. The car driver mode share is identified as 82.5% for Wisloe, 85.3% for Whitminster and 79.7% for Moreton Valence / Hardwicke.

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- 7.19 Again, the proportion of work related trips made by car is less at Moreton Vallance / Hardwicke than it is at Wisloe.
- 7.20 Combined with the above, a Local Plan development at Moreton Valence / Hardwicke would generate less work related trips by car travelling a shorter average distance than the proposed allocation at Wisloe. This alternative development location would therefore comply much more readily with the Council's policies and objectives to reduce car use and reduce CO₂ emissions.
- 7.21 Looking at public transport (bus and train) use on the journey to work in isolation, Wisloe is 2.2%, Whitminster is 2.6% and Moreton Valence / Hardwicke is 6.3%. This suggests that the opportunities for public transport use at Moreton Valence / Hardwicke are already much higher than at Wisloe. This is a strong starting point when seeking to influence the travel behaviour of future residents and one that can be more easily built upon. This further emphasises the non-car travel related benefits of locating development closer to the major settlements rather than seeking to create new settlements in open countryside.
- 7.22 It is also noted that the residential development site at Great Oldbury to the west of Stonehouse (currently under construction) is committed to the introduction of a new half-hourly frequency bus service linking Stroud with Gloucester via Stonehouse, Whitminster and the A38 corridor towards the north. This new service will be beneficial to the PGP1 Whitminster and PGP2 Moreton Valence / Hardwicke sites as it will enhance the baseline public transport provision for both and likely increase the proportion of trips undertaken by non-car modes of transport. This new service will not benefit the draft Wisloe allocation.
- 7.23 Wider bus service improvements are also being promoted as part of the Draft Local Plan and it is understood that the bus operator Stagecoach's ambition is to create an integrated, frequent, fast bus service linking to major centres of employment. Providing residential development close to the major centres of employment therefore enables combined access to these high standard services and allows the bus operator to make better use of the Strategic Road Network rather than having to travel cross-country. This in turn reduces journey times and makes the services more attractive to potential passengers and leading to greater modal shift.
- 7.24 Similarly, the District Council and other stakeholders are investing heavily in the rejuvenation of the Stroudwater canal in the vicinity of Whitminster as evidenced by the recent completion of a new section of canal below the A38 / A419 roundabout. The canal towpath will provide an excellent walking and cycling route to Stonehouse and Stroud (as with completed sections further to the east) and will supplement National Cycle Route 45 which already connects Whitminster with these higher order settlements via Grove Lane and primarily off-road cycle paths. It will be a relatively simple exercise to connect the potential Whitminster site to these existing and already proposed walking and cycling routes in direct comparison to the significant difficulties associated with introducing the walking and cycling routes required at Wisloe from scratch.

Traffic Forecasting

- 7.25 As previously discussed, the Traffic Forecasting Report that seeks to support the Draft Local Plan has identified the need for a considerable number of junction improvements and similar interventions throughout the District. These include capacity enhancements to the A38 Cross Keys roundabout and an all movements / grade separated upgrade to Junction 12 of the M5.
- 7.26 It is considered that relocating development from Wisloe to Moreton Valence / Hardwicke would not require any additional mitigation over and above that already allowed for within the Traffic Forecasting Report. This is particularly the case given that Moreton Valence / Hardwicke is in a more sustainable location and traffic generation is therefore likely to be less than at Wisloe.
- 7.27 A similar situation applies at Whitminster where the Traffic Forecasting Report identifies the need to signalise the existing crossroads in the centre of the village and fully signalise the roundabout above Junction 13 of the M5. Again, it is considered unlikely that any additional highway mitigation would be required if the Wisloe allocation were to be relocated to Whitminster.
- 7.28 Direct access to the A419 to the southwest of the PGP1 Whitminster site could be provided that would minimise the impact on the A38 through the village and along its corridor. This in turn would be beneficial to the operation of the signed diversionary route on the occasions that the M5 is closed.
- 7.29 It is considered that relocating the proposed allocation from Wisloe to either Whitminster or Moreton Valence / Hardwicke would not undermine the conclusions of the current Traffic Forecasting Report. The traffic impact of these alternative locations when compared to that of the draft allocation at Wisloe should not be used as a constraining factor in the decision making process.

8 Summary

- 8.1 This Note identifies transport related issues and concerns associated with the Stroud District Council Draft Local Plan and in particular the proposed allocation of land at Wisloe (PS37) for approximately 1,500 houses and 5 hectares of employment. It has been prepared on behalf of Slimbridge Parish Council and Wisloe Action Group and is presented as an objection to the Draft Local Plan in its current form.
- 8.2 A detailed review of the policies and objectives of the Draft Local Plan has been undertaken together with its transport related supporting documents, namely the Sustainable Transport Strategy and the Traffic Forecasting Report. It has also discussed the transport requirements for the Wisloe site that have been identified by the Council and the assumptions that have been made in identifying these requirements.
- 8.3 The Council's position is that the draft PS37 Wisloe allocation requires significant transport related interventions and mitigation measures to enable it to become a sustainable and accessible location for development. These include a direct pedestrian / cycle link to Cam & Dursley Railway Station, a sustainable pedestrian / cycle / public transport corridor along the A4135, a local centre within the site to provide for day to day needs, additional bus services on the A38 and A4135 coupled with soft measures such as Travel Plans, car share schemes and similar.
- 8.4 Delivery of the direct pedestrian / cycle link to the Railway Station and the sustainable corridor along the A4135 (both identified as necessary by the Council) cannot be guaranteed. There are third party land ownership issues that may prevent implementation and agreements required with the likes of Highways England and Network Rail which may not be forthcoming. There are considerable technical challenges and delivery (if indeed possible) would require significant financial outlay that may adversely impact on the overall viability of the site. It is not considered appropriate to base Local Plan decisions on infrastructure requirements and accessibility improvements that may not be deliverable.
- 8.5 The Council has made assumptions for the likely effectiveness of the proposed transport related interventions based on nothing more than the experience and judgement of the report's authors. No evidence of the ability for the identified interventions to deliver the level of modal shift required to make the proposed Wisloe allocation sustainable has been provided by the Council. Without such evidence the conclusions of the Sustainable Transport Strategy and Traffic Forecasting Report cannot be relied upon.
- 8.6 Considerable doubt has been placed on both the ability to physically deliver the required sustainable travel improvements identified by the Council and their effectiveness should they be delivered. Without the improvements and the high levels of modal shift the Council assume they will deliver, the development would clearly be in an unsustainable location that would be reliant on the use of the private car. The traffic impacts of the site would also be much higher than those identified within the Forecasting Report.

-
- 8.7 In this context, the Wisloe site would be contrary to the National Planning Policy Framework where the fundamental transport related objectives are to limit the need to travel and to offer a genuine choice of transport modes such that congestion and emissions can be reduced.
- 8.8 Alternative locations for development at Whitminster (PGP1) and Moreton Valence / Hardwicke (PGP2) have been considered but discounted by the Council. Both sites are close to higher order settlements where employment opportunities are significantly greater, the ability to deliver accessibility improvements is much easier / more cost effective, and the overall traffic and transport impacts would be lower.
- 8.9 For instance, the average journey to work distance for the Wisloe area has been shown to be 24.5% higher than that for Moreton Valence / Hardwicke and 14.4% higher than that for Whitminster. Either alternative location would therefore result in reduced travel distances, reduced congestion and reduced emissions when compared to the current draft proposal at Wisloe. Either alternative location would also comply better with the wider transport policies of both the National Planning Policy Framework and indeed the Council's Draft Local Plan.
- 8.10 It is maintained that, in transport terms, the Draft Local Plan allocation at Wisloe represents an inappropriate location for a development of approximately 1,500 houses and 5 hectares of employment. It is an unsustainable location which would be wholly reliant on extensive accessibility improvements which may not be possible to deliver. Alternative sites are available in locations that would reduce overall travel distances and emissions and better address the Council's Climate Emergency agenda.
- 8.11 Given the above, the Council are respectfully invited to reconsider the Draft Local Plan and, in particular, to delete the draft PS37 allocation at Wisloe.

APPENDIX A

National Census Data – Likely Rail Usage

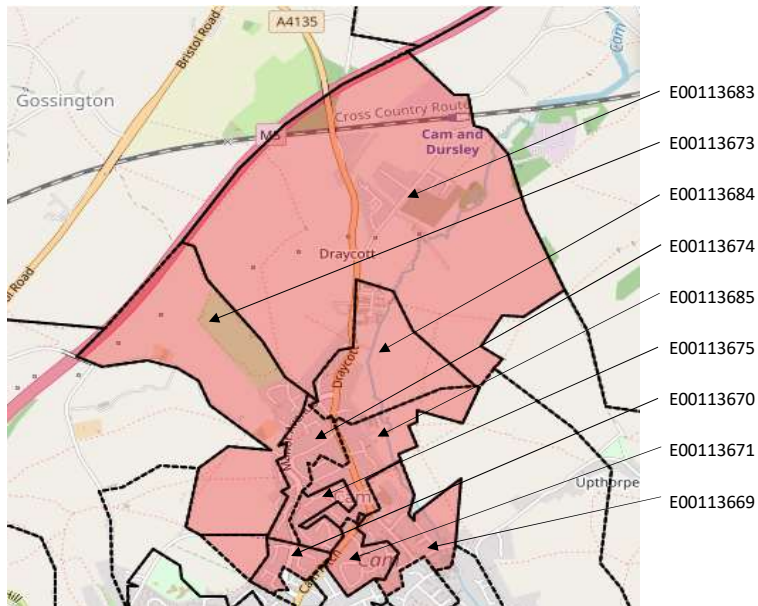
QS701EW - Method of travel to work

ONS Crown Copyright Reserved [from Nomis on 2 June 2021]

population All usual residents aged 16 to 74
 units Persons
 date 2011
 rural urban Total

Method of Travel to Work	E00113669	E00113670	E00113671	E00113673	E00113674	E00113675	E00113683	E00113684	E00113685	TOTAL	%age
All categories: Method of travel	242	242	151	212	261	219	220	175	218	1,940	
Work mainly at or from home	19	5	4	9	20	5	4	5	14	85	4.38%
Underground, metro, light rail, t	0	0	0	0	0	0	0	0	0	0	0.00%
Train	3	3	0	4	7	5	2	2	1	27	1.39%
Bus, minibus or coach	1	0	1	5	2	2	3	5	1	20	1.03%
Taxi	0	0	0	0	0	0	0	0	0	0	0.00%
Motorcycle, scooter or moped	1	1	1	1	6	0	1	0	2	13	0.67%
Driving a car or van	137	155	54	118	127	122	120	83	114	1,030	53.09%
Passenger in a car or van	7	11	7	7	10	11	9	8	8	78	4.02%
Bicycle	2	3	1	1	1	6	3	0	3	20	1.03%
On foot	14	9	13	11	12	8	8	16	17	108	5.57%
Other method of travel to work	1	3	0	1	2	0	0	0	2	9	0.46%

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.



APPENDIX B

National Census Data – Comparison with PGP1 and PGP2

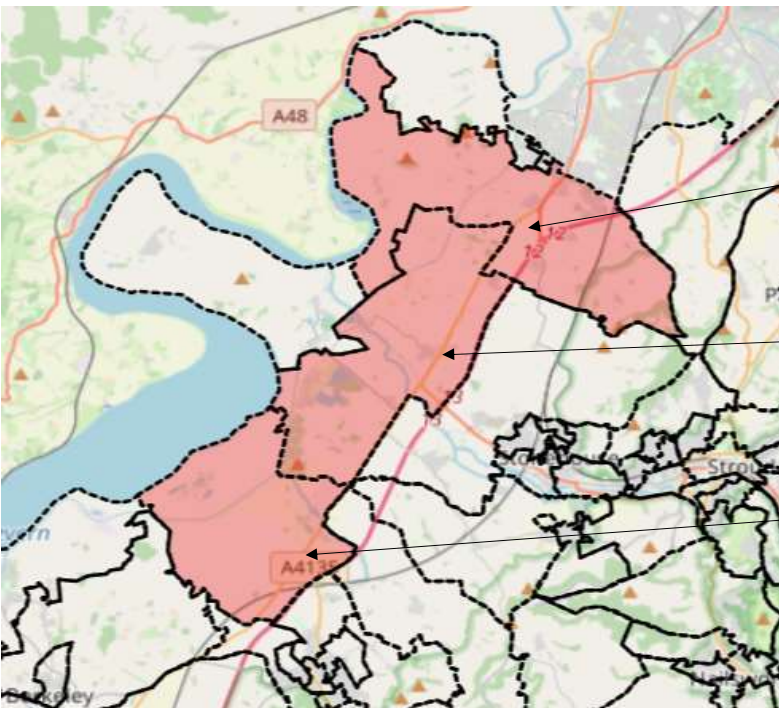
QS702EW - Distance travelled to work

ONS Crown Copyright Reserved [from Nomis on 22 June 2021]

population All usual residents aged 16 to 74 in employment the week before the census
 units Persons
 date 2011
 rural urban Total

Distance travelled to work	Moreton Valence / Hardwicke E01022380 : Stroud 001C		Whitminster E01022396 : Stroud 003B		Slimbridge E01022398 : Stroud 003D	
	All categories: Distance travelled	829		914		566
Less than 2km	51	6.2%	57	6.2%	31	5.5%
2km to less than 5km	68	8.2%	97	10.6%	48	8.5%
5km to less than 10km	242	29.2%	154	16.8%	97	17.1%
10km to less than 20km	143	17.2%	181	19.8%	134	23.7%
20km to less than 30km	36	4.3%	89	9.7%	42	7.4%
30km to less than 40km	23	2.8%	49	5.4%	28	4.9%
40km to less than 60km	22	2.7%	20	2.2%	12	2.1%
60km and over	25	3.0%	31	3.4%	23	4.1%
Work mainly at or from home	139	16.8%	152	16.6%	108	19.1%
Other	80	9.7%	84	9.2%	43	7.6%
Total distance (km)	10,626.9		12,776.3		8,905.9	
Average distance (km)	17.4		18.8		21.5	

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.



E01022380 (Moreton Valence / Hardwicke)

E01022396 (Whitminster)

E01022398 (Wisloe)

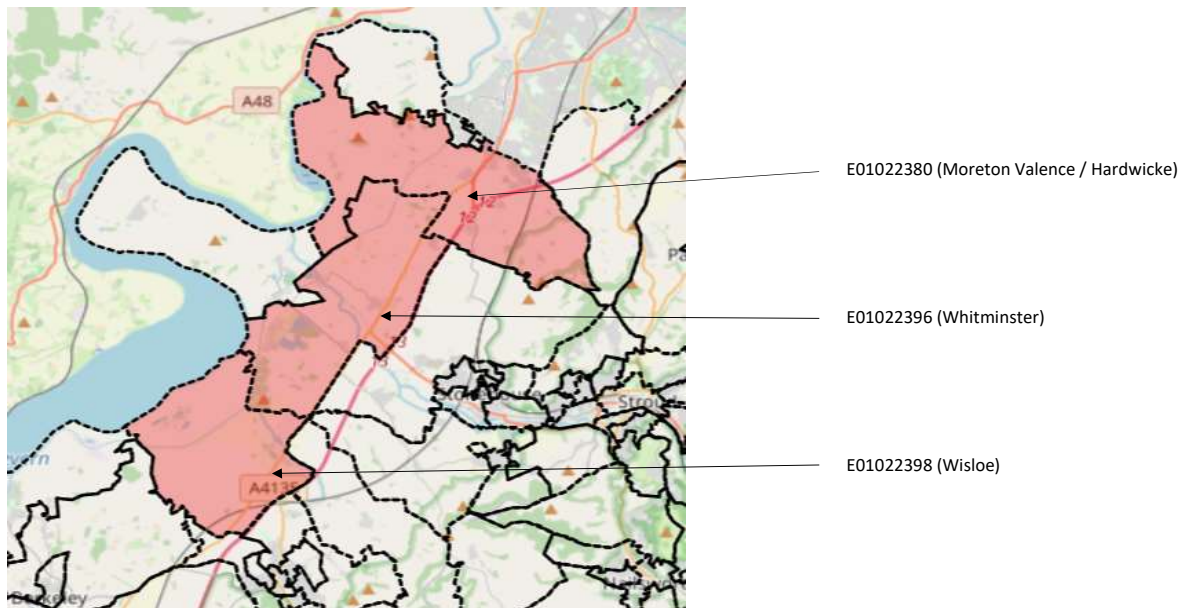
QS703EW - Method of Travel to Work (2001 specification)

ONS Crown Copyright Reserved [from Nomis on 23 June 2021]

population All usual residents aged 16 to 74
 units Persons
 date 2011

Method of Travel to Work	Moreton Valence / Hardwicke			Whitminster			Slimbridge		
	E01022380 : Stroud 001C		690	E01022396 : Stroud 003B		762	E01022398 : Stroud 003D		458
All categories: Method of tra	1,111			1,241			848		
Work mainly at or from hom	139	12.5%	n/a	152	12.2%	n/a	108	12.7%	n/a
Underground, metro, light ra	1	0.1%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%
Train	12	1.1%	1.7%	7	0.6%	0.9%	7	0.8%	1.5%
Bus, minibus or coach	32	2.9%	4.6%	13	1.0%	1.7%	3	0.4%	0.7%
Taxi	2	0.2%	0.3%	1	0.1%	0.1%	1	0.1%	0.2%
Motorcycle, scooter or mop	9	0.8%	1.3%	4	0.3%	0.5%	2	0.2%	0.4%
Driving a car or van	550	49.5%	79.7%	650	52.4%	85.3%	378	44.6%	82.5%
Passenger in a car or van	36	3.2%	5.2%	30	2.4%	3.9%	35	4.1%	7.6%
Bicycle	16	1.4%	2.3%	22	1.8%	2.9%	14	1.7%	3.1%
On foot	25	2.3%	3.6%	29	2.3%	3.8%	18	2.1%	3.9%
Other method of travel to w	7	0.6%	1.0%	6	0.5%	0.8%	0	0.0%	0.0%
Not in employment	282	25.4%	n/a	327	26.3%	n/a	282	33.3%	n/a

In order to protect against disclosure of personal information, records have been swapped between different geographic areas.
 Some counts will be affected, particularly small counts at the lowest geographies.





Appendix %%

Statement on Land Quality (PS37)

1.0 Introduction and Qualification

1. Wisloe Action Group (WAG) was formed in late 2019 to help represent our community's views in response to Stroud District Council's Local Plan public consultation process. This statement sets out evidence with respect to higher quality agricultural land at PS37. It raises significant concerns with respect to the loss of 82 hectares of Best and Most Versatile land (BMV) Grade 2 land. It highlights the proposer's flawed Agricultural Land Classification (ALC) report submitted to Stroud District Council (SDC) in 2019, which was published in the draft local plan consultation. The findings of the report have been included in SDC documents, including Sustainability Appraisals. WAG commissioned a professional review of the proposer's report, which concludes it was flawed and recommended referral to Natural England. SDC proceeded to publish the original flawed document in the Regulation 19 consultation. SDC has committed to be Carbon Neutral by 2030 but has not applied the policies. PS37 does not comply with NPPF para 170 a) and para 170 b).

1.2. The land remains classified as Grade 2 BMV by Natural England.

1.3. WAG commissioned the professional services of [REDACTED] who is a Chartered Scientist (CSci) and a Fellow (F.I. Soil Sci) of the British Society of Soil Science (BSSS). [REDACTED] meets the requirements of the BSSS Professional Competency Standard (PCS) scheme for Agricultural Land Classification of England and Wales. The BSSS PCS scheme is endorsed, amongst others, by the Department for Environment, Food and Rural Affairs (Defra), Natural England, the Science Council, and the Institute of Environmental Assessment and Management (IEMA). Upon written appointment, [REDACTED] is available to attend the hearing session.

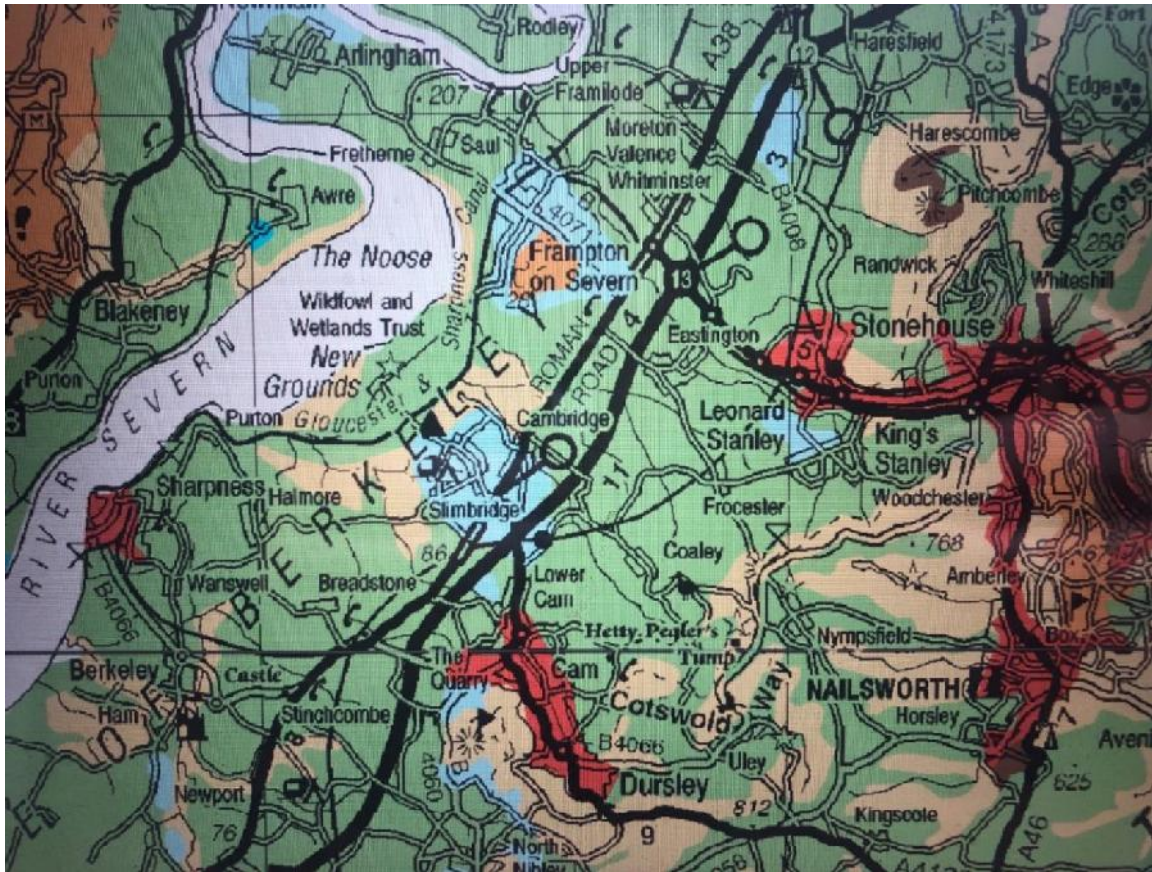
2.0. Natural England's Agricultural Land Classification (ALC)

2.1. The guidance for assessing the quality of agricultural land in England and Wales is set out in the Ministry of Agriculture, Fisheries and Food (MAFF) guidelines (CD8.8). It is summarised in ¹Natural England's Technical Information Note (TIN) 049 (CD8.11). **If properly applied it provides a robust and consistent assessment of the quality of agricultural land.** ALC uses a grading system to assess and compare the quality of agricultural land in England and Wales. A combination of climate, topography and soil characteristics and their unique interaction determines the limitation and grade of the land. These features affect the range of crops that can be grown, yield of crop, consistency of yield and cost of producing the crop. ALC is graded from 1 to 5. The highest grade goes to land that; gives a high yield or output, has the widest range and versatility of use, produces the most consistent yield and requires less input. BMV agricultural land is graded 1 to 3a (emphasis added).

Wisloe Action Group – Statement on Land Quality (PS37)

Grade	Description
Grade 1 – excellent quality agricultural land (BMV)	Land with no or very minor limitations. A very wide range of agricultural and horticultural crops can be grown and commonly includes: top fruit, for example tree fruit such as apples and pears, soft fruit, such as raspberries and blackberries, salad crops and winter harvested vegetables Yields are high and less variable than on land of lower quality.
Grade 2 – very good quality agricultural land (BMV)	Land with minor limitations that affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown. On some land in the grade there may be reduced flexibility due to difficulties with the production of the more demanding crops, such as winter harvested vegetables and arable root crops. The level of yield is generally high but may be lower or more variable than grade 1
Grade 3 – good to moderate quality agricultural land (see subgrade descriptions)	Land with moderate limitations that affect the choice of crops, timing and type of cultivation, harvesting or the level of yield. Where more demanding crops are grown yields are generally lower or more variable than on land in grades 1 and 2.
Subgrade 3a – good quality agricultural land (BMV)	Land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals, or moderate yields of crops including: cereals, grass, oilseed rape, potatoes, sugar beet and less demanding horticultural crops
Subgrade 3b – moderate quality agricultural land	Land capable of producing moderate yields of a narrow range of crops, principally; cereals and grass, lower yields of a wider range of crops, high yields of grass which can be grazed or harvested over most of the year
Grade 4 – poor quality agricultural land	Land with severe limitations which significantly restrict the range of crops or level of. It is mainly suited to grass with occasional arable crops (for example cereals and forage crops) the yields of which are variable. In moist climates, yields of grass may be moderate to high but there may be difficulties using the land. The grade also includes arable land that is very dry because of drought
Grade 5 – very poor quality agricultural land	Land with very severe limitation that restrict use to permanent pasture or rough grazing, except for occasional pioneer forage crops.

2.2. ²Natural England’s Agricultural Land Classification Map South West Region (ALC006) documents land across the region according to its status. Diagram 1 is an extract of ALC006, focused on the Stroud District. Land in the Slimbridge Parish, including PS37, is classified as Grade 2 BMV.



Grade	Description
1	Excellent
2	Very Good
3	Good to Moderate
4	Poor
5	Very Poor

Non-Agricultural Land	
Orange	Other land primarily in non-agricultural use
Red	Land predominantly in urban use

There are scarce pockets of BMV land in the Stroud District, and even less that is classified as Grade 2. Stroud District does not have Grade 1 BMV land. The loss of 82 hectares of Grade 2 BMV land is therefore significant.

2.3. A detailed ALC survey was conducted on behalf of MAFF on an area of land in Slimbridge, in preparation for a previous Stroud local plan in 1998. This area of land is in close proximity to PS37, and is classified as Grade 2 BMV land on the ²Natural England Agricultural Land Classification Map South West Region (ALC006). The MAFF report at Appendix 1 confirms the land surveyed is Grade 2 BMV.

3.0. Introduction to Site Allocation PS37

3.1 This area is well known as being the best farming land in the local area. PS37 is primarily composed of productive agricultural land and permanent pasture. Ernest Cook Trust's (ECT) land produces high quality and yield crops, this is confirmed by the tenants who have farmed the land for many years. Gloucestershire County Council (GCC) land is managed by an equestrian livery tenant. This land produces high quality, high yield crops (south of the A4135) as well permanent pasture for equestrian grazing (north of the A4135).

4. The Proposers ALC Survey and Report

4.1. The proposers commissioned Soil Environment Services Ltd (SES) to conduct an ALC survey. The report states that SES surveyors visited on 3-4th September 2019 although the surveyor was not seen by residents or liveries. Residents recently advised that SES visited site on 13/05/21 but did not survey and confirmed they are no longer involved.

4.2. The proposers submitted the ³SES ALC document to SDC. The SES document concluded that PS37 was almost 100% grade 3b. SDC accepted the proposers report without validation, publishing it in the Draft Local Plan Consultation in November 2019 and the Pre-submission Consultation in May 2021.

4.3. As a result of the critique completed by the soil expert retained by WAG the proposers recently commissioned another company to conduct a further survey. A resident confirmed a survey took place on the GCC land on the morning on 26th June 2021. Wales & West Utilities (W&WU), operators of the high-pressure gas pipeline, confirmed they had not been contacted prior to surveying taking place.

5. Stroud Local Plan Consultations and Responses

5.1. The ⁴Sustainability Appraisal Scoping Report for the Stroud District Local Plan Review (April 2018) provides important information relating to higher quality agricultural soils. Para 3.87 states; *“Most of the land in Stroud District is classed as Grade 3 (Good to Moderate) Agricultural Land. Relatively large areas of Grade 2 (Very Good) Agricultural Land are present in Stroud most notably to the west by Slimbridge,The distribution of different grades of agricultural soils in Stroud is shown in Figure 3.8 (below): Agricultural Land Classification at the end of this chapter”.*

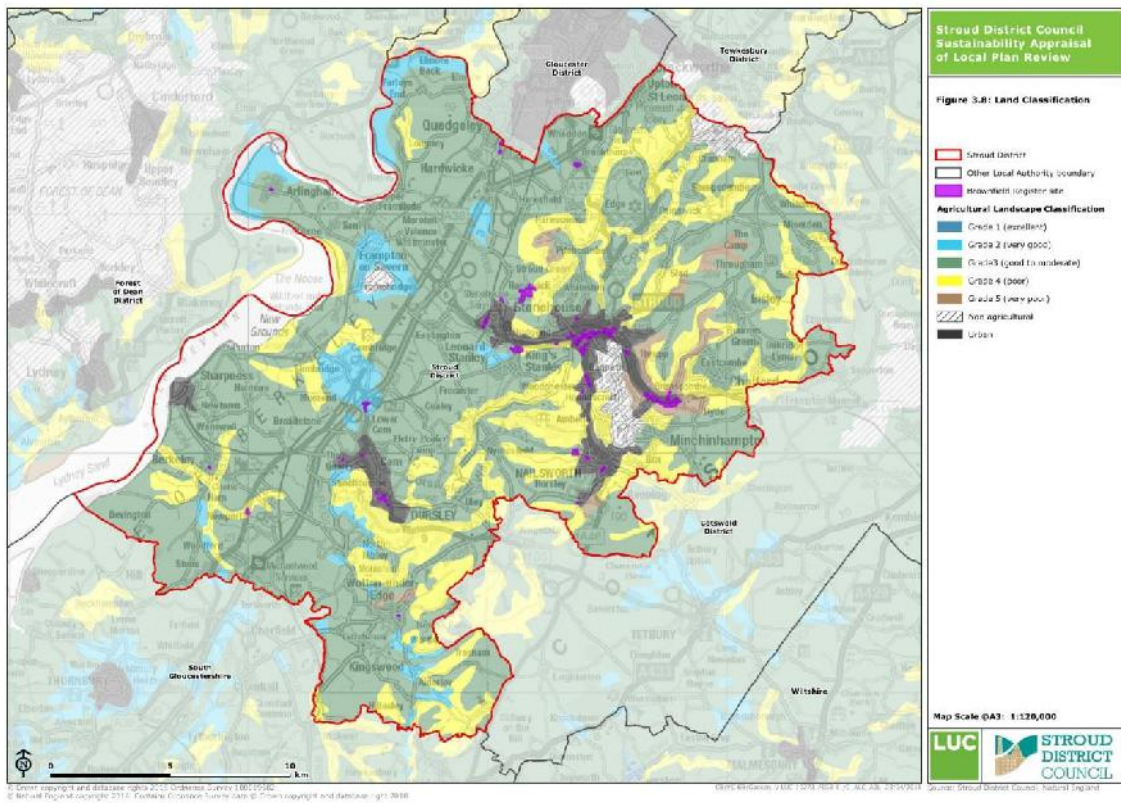


Figure 3.8 aligns to ²Natural England’s map (ALC006) and shows there are a small number of BMV Grade 2 areas of land (no Grade 1) across the whole of the Stroud District, including the whole of PS37. The report comments on the benefits that the local plan could deliver to protect higher quality land in the district. See Table 4.1 below.

Key Sustainability Issues for Stroud	Likely Evolution without the Local Plan Review
<p><i>The large area of Grade 3 Agricultural Land is a significant asset to the District; however pressures from development and climate change threatened the viability and productivity of such soils.</i></p>	<p><i>The pressures for new development in the District are likely to result in some development occurring in areas where high quality agricultural soils are present. The adopted Stroud District Local Plan (2015) contains policy to promote development at locations which would result in the re-use of previously developed land most notably through Core Policy CP14: High Quality Sustainable Development. The Local Plan Review presents the opportunity to update planning policy in the District to specifically protect higher value agricultural soils in the District in addition to promoting the re-use of previously developed land. The Local Plan Review might also be used to allocate sites for development which do not make use of higher quality agricultural soils (with consideration for the other principles of sustainable development).</i></p>

This report acknowledges that Grade 3 land is a significant asset but fails to mention the importance of higher quality Grade 2 land.

5.2. The proposers flawed ³ALC report has been used to inform the Sustainability Appraisal and make decisions on site selection. Four examples below clearly demonstrate how the report influenced decision making:

5.2.1. ⁵Sustainability Appraisal Report for the Stroud District Local Plan Review – Draft Plan (2019) states at 5.29 ; *“Both draft site allocations would involve the development of a sizeable amount of greenfield land to deliver the new settlements. Both sites also include Grade 3 agricultural land. However, **more detailed information available about the agricultural land at the Wisloe draft site allocation (PS37) indicates that this land falls within the Grade 3b category (which is not classified as ‘best and most versatile’ agricultural land).** Considering the large area of greenfield land take which would result through the development of both draft site allocations, the negative effect expected in relation to SA objective 13: efficient land use is recorded as significant”.*

5.2.2. ⁵Sustainability Appraisal Report for the Stroud District Local Plan Review – Draft Plan (2019) states at 6.5 ; *“**Many of the draft site allocations are on greenfield land, including sites atas well as the new settlements at Newtown and Sharpness (PS36) and Wisloe (PS37). These greenfield sites are large and/or contain Grades 1, 2 or 3 agricultural soils which are likely to be lost as a result of development (although much of the land within the boundaries at PS37 has been identified as being Grade 3b, which is not classified as ‘best and most versatile’ land)**”.* The same commentary is contained in parts of this report.

5.2.3. There is additional information contained in the ⁶Sustainability Assessment for Additional Housing Consultation (October 2020) page 46 states; *“Option A: **Much of the land surrounding the new growth point at Wisloe comprises Grade 2 agricultural soils. It is noted, however, that detailed site assessment work for this location has demonstrated that this land is Grade 3b**” (emphasis added). “Option B: This option is not expected to greatly increase the loss of Grade 2 agricultural soils to development, although **land around Tier 3 settlements of Slimbridge, Frampton on Severn and Leonard Stanley both lie in close proximity to relatively large areas of land containing these types of soils**” (emphasis added). This suggests that as per the Natural England ALC006 map, land in the Slimbridge area is BMV grade 2.*

5.2.4. ⁷The Sustainability Appraisal Report for the Stroud District Local Plan Review : Presubmission Draft (May 2021) para 6.52 states *“These greenfield sites are large and/or contain Grades 1, 2 or 3 agricultural soils which are likely to be lost as a result of development (**although much of the land within the boundaries at PS37 has been identified as being Grade 3b, which is not classified as ‘best and most versatile’ land**)” (emphasis added).*

5.5. Natural England, Slimbridge Parish Council (SPC), WAG, District Councillors, Stroud Green Party, Campaign to Protect Rural England (CPRE) and a significant proportion of hundreds of residents and other independent parties, raised the ALC issue through consultation responses.

Wisloe Action Group – Statement on Land Quality (PS37)

5.5.1. The Stroud Green Party stated at an early stage that PS37 should be removed from the plan, citing a number of reasons including land quality. The (⁸Green Party Response to the Stroud District Local Plan Review – Emerging Strategy January 2019) Page 2 states; *“The proposed Wisloe housing site should not be included in the revised Local Plan. The Natural England Agricultural Land Classification Map South West Region (ALC006) shows the land around Wisloe as being Grade 2 (Very Good), of which there is very little in Stroud District. Development should be avoided on such high-quality agricultural land, and **such a high agricultural quality grading should reduce the sustainability rating of any proposed development on such land**”.* (emphasis added)

5.5.2. ⁹Natural England responded to the Regulation 18 Consultation with respect to land quality SA objective 13; *“**With regard to the sites named in paragraph 6.50: ‘.....as well as the new settlements at Newtown and Sharpness (PS36) and Wisloe (PS37).’ With respect to higher value soils Natural England would welcome further dialogue with the Council and/or relevant stakeholders, as necessary, in relation to the identification and conservation of ‘best and most versatile’ agricultural land**”.* (emphasis added)

5.6. ¹⁰SDC’s Statement of Community Involvement (SCI) para 2.14 states *“We will consult with specific and general consultation bodies and with members of the public on the content of the document. We will feedback on how comments have been taken into account through the publication of consultation reports on the website”.* SDC failed to provide feedback on how consultation responses were addressed with respect to higher quality land.

5.7. During the local plan process, SDC failed to;

- a). Refer the proposers report to Natural England (in line with Natural England’s guidance),
- b). Contact Natural England to consult on their January 2020 draft local plan response,
- c). Provide feedback on how comments have been taken into account through the publication of consultation documents in line with the SCI.

6. WAG ALC Consultant’s Report

6.1. WAG contacted SDC, Party Leaders and District Councillors to raise concerns on land grading following the publication of the draft local plan. There was no response from SDC. WAG funded and commissioned an expert consultant, [REDACTED] to prepare an independent review of the proposers ALC report, see Appendix 1.

6.2 [REDACTED] letter demonstrates that the fieldwork results in the SES report do not provide adequate soil profile data. It failed, for example, to distinguish between medium clay loam and heavy clay loam. The determination in Section 4.3 of the SES report that a single type of soil (Type 1) across the site is in Wetness Class IV is inconclusive and cannot be substantiated against the criteria set out in the ALC Guidelines. Rather, the soil colours, soil textures and soil structures, as presented in the SES report, indicate that Soil Type 1 is in Wetness Class I (well drained).

6.3 [REDACTED] concludes that the ALC grading of all the agricultural land at the site being in Subgrade 3b due to soil wetness cannot be validated from the information given in the SES report. If, as the information in the SES ALC report indicates, the Soil Type 1 is in Wetness Class I, then all the agricultural land at the site retains the Natural England classification of **Grade 2**.

6.4. [REDACTED] references the significance of the MAFF survey conducted in Slimbridge in 1998 (refer to para 4.2 of this statement). The MAFF report is included in [REDACTED] report.

6.5. ████████ recommends referral to Natural England for technical advice, under the provision of Schedule 4(y) of the Town and Country Planning (development Management Procedure) England Order (2015) No 595.

6.6. WAG shared ████████ letter with SDC, all parties leaders and PRP members on 20th February 2021. SDC contacted the proposers, who confirmed that a new report would be published soon. In the absence of a report, SDC contacted Natural England 5 weeks later. SDC and Natural England met on the 8th April 2021. Natural England emailed SDC on 12th April 2021, referring to good practice for local plan policy and practice. It mentions locating development on lower ALC grade land and safeguarding higher grades through green infrastructure role. It also refers to the export of soil from the site. We comment on this alternative later. The correspondence can be found in Appendix 2.

6.7. The proposers report has not been made available at the time of drafting this statement. WAG hold significant concerns about the lack of opportunity to scrutinise and comment on such important information through the consultation process.

7. WAG Sustainability Appraisal Review

WAG commissioned expert sustainability consultants, ¹¹Clearlead Consulting Ltd, to review published sustainability appraisal consultation documents. This report is included in this WAG consultation response; it raises a number of sustainability appraisal issues including with respect to high quality land.

8. Planning Policies, Frameworks and Guidance

8.1. Natural England's Policies and Guidance - ¹¹Natural England's Guide to assessing development proposals on agricultural land (Updated 5 February 2021) states *"In the circumstances set out in Schedule 4 paragraph (y) of the Development Management Procedure Order 2015, Natural England is a statutory consultee. The Natural England guidance states; "The Natural England policies protect agricultural land and soil. Developers and local planning authorities (LPAs) should refer to the following government policies and legislation when considering development proposals that affect agricultural land and soils. They aim to protect:*

- *the best and most versatile (BMV) agricultural land from significant, inappropriate or unsustainable development proposals*
- *all soils by managing them in a sustainable way*

Natural England uses these policies to advise on development proposals as a statutory consultee in the planning process". (emphasis added). The guide states in para 1.3; Planning authorities must consult Natural England on all non-agricultural applications that result in the loss of more than 20 hectares (ha) of BMV land if the land is not included in a development plan. For example, this includes the likely cumulative loss of BMV land from the proposed development if it's part of a phased development. This is required by schedule 4(y) of the Order" (emphasis added). There is no evidence to demonstrate that SDC attempted to consult Natural England until the end of March 2021.

8.2. Guide to Assessing Development Proposals on Agricultural Land and the Planning Policy Framework (NPPF) February 2019

Wisloe Action Group – Statement on Land Quality (PS37)

8.2.1. ¹¹The Guide to Assessing Development Proposals on Agricultural Land states ; *“LPAs should use the NPPF to make decisions about the natural and local environment to: protect and enhance landscapes, biodiversity, geology and soils, **recognise soils as a natural capital asset that provide important ecosystem services, consider the economic and other benefits of BMV agricultural land, and try to use areas of poorer quality land instead of higher quality land, prevent soil, air, water, or noise pollution, or land instability from new and existing development.***

8.2.2. *The ¹²NPPF states ; Paragraph 170. Planning policies and decisions should contribute to and enhance the natural and local environment by:*

a) **protecting and enhancing** valued landscapes, sites of biodiversity or geological value and **soils (in a manner commensurate with their statutory status or identified quality in the development plan);**

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – **including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;**

8.2.3. Paragraph ¹²171 states ; Plans should: distinguish between the hierarchy of international, national and locally designated sites; **allocate land with the least environmental or amenity value**, where consistent with other policies in this Framework⁵³; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

Footnote 53 **Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.**

8.3. The Government ¹³‘A Green Future: Our 25 Year Plan to improve the Environment 2018’ plan states; *“Our 25 Year Plan to Improve the Environment sets out the government’s 25-year plan to improve the health of the environment by using natural resources more sustainably and efficiently. It plans to: **protect the best agricultural land, put a value on soils as part of our natural capital, manage soils in a sustainable way by 2030, restore and protect peatland**”, and, that **“New development will happen in the right places, delivering maximum economic benefit while taking into account the need to avoid environmental damage. We will protect ancient woodlands and grasslands, high flood risk areas and our best agricultural land.”***

SDC has not protected our scarce Grade 2 best agricultural land assets in the district and there are large alternative sites that have poorer quality land than PS37.

8.3.4. There is no clear rationale presented in the plan as to why reasonable alternatives with poorer quality land (shown on ²Natural England’s classification map) have not been selected. SDC has not assessed the economic and social loss with respect to farming and equestrian jobs, supporting services and revenue to the rural economy.

8.3.5 Fundamentally, WAG consider that in choosing to identify PS37 as an allocation based on flawed information, planning decisions have been made that fail to protect and enhance soils and do not recognise the economic and other benefits of the BMV agricultural land in the district. Paragraph’s ¹²170 a) and 170 b) of the NPPF have therefore not been complied with. Alternative sites of strategic size that have lower quality land have been excluded from the plan.

8.4. Code of practice for the sustainable use of soils on construction sites

8.4.1. The PS37 land is an essential natural capital asset that provides important ecosystem services as a growing medium for food and other crops, and as a store for carbon and water. It is a high tide roost for curlew and acts as a buffer against air pollution from the M5, A38, A4135 and the national rail network. Defra published the code of practice to provide advice on the use and protection of soil in construction projects, including the movement and management of soil resources. SDC's Head of Strategic Planning suggested at the Environment Meeting held on 20th April 2021 that the 'whole of the proposed allocation could have all soil removed and moved to another location'. Natural England states that, 'this is the least preferred approach'. It would almost certainly not be their intention for this option to be utilised for a large strategic allocation comprising 82 hectares of Grade 2 BMV land. This would involve significant number of lorry movements (and how far would they need to travel) and is not a realistic or sustainable approach. It also goes against the ¹⁴Defra Code of Construction Practice for the Sustainable Management of Soils on Construction Sites.

9. Stroud District's Commitment to be Carbon Neutral by 2030

9.1. A Climate Emergency was announced by SDC on 16th November 2018 that pledged to 'do everything within the Council's power to make ¹⁵Stroud District Carbon Neutral by 2030'. SDC was the first council to make this declaration. The most significant way a council can take action to meet this commitment, is through the local plan process. At the SDC Environment Committee on 6th June 2019, Progressing Carbon Neutral was discussed. The Implementation of Climate Change Emergency Motion Appendix A states ;

"Adaption to Climate Change on Page 5. Para 3.6. "Stroud District can through the Local Plan: ☐ Protect the most productive agricultural land to allow conversion to production of crops for local consumption.

Changes to become Carbon Neutral - Page 6. Para 4.1. "a dramatic reduction in emissions from agricultural food production and land use.

Actions in Stroud District - Page 12. 5.38. Agricultural policy is largely outside the remit of the District Council although, through planning policy and the implementation of green infrastructure requirements, there may be some opportunities to influence land management".

9.2. SDC has failed to demonstrate commitment to these policies to protect and enhance land use.

10. Summary

10.1. SDC has failed to respond to concerns regarding land grading until the very end of the Regulation 19 response phase thereby denying respondents the right to comment and reply on the second proposers' ALC report (should it be submitted to the hearing).

10.2. SDC did not engage with a statutory consultee even though Natural England's Regulation 18 consultation response stated they would "**welcome further dialogue with the Council and/or relevant stakeholders, as necessary, in relation to the identification and conservation of 'best and most versatile' agricultural land**" (emphasis added).

10.3. SDC has mismanaged higher land quality through the local plan, by using unverified ALC data provided by the proposers without referral to Natural England.

Wisloe Action Group – Statement on Land Quality (PS37)

10.4 In selecting PS37 as an allocation based on flawed information, planning decisions have been made that fail to protect and enhance soils and do not recognise the economic and other benefits of the BMV agricultural land in the district. Paragraph's 170 a) and 170 b) of the NPPF have therefore not been complied with. SDC has not considered reasonable alternatives, which have poorer quality land.

10.5. The selection of PS37 for inclusion in the local plan is unsound and not legally compliant.

10.6. Allocating PS37 deprives the district of scarce Grade 2 BMV land which is contrary to Government and council policy and damages food production and the environment.

10.7. ██████████, a Chartered Scientist (CSci) and a Fellow (F.I. Soil Sci) of the British Society of Soil Science (BSSS), is available to attend the hearing session.

Endnote

¹Natural England's Technical Information Note (TIN) 048 (CD8.11)

²Natural England's Agricultural Land Classification Map South West Region (ALC006)

³SES ALC document

⁴Sustainability Appraisal Scoping Report for the Stroud District Local Plan Review (April 2018)

⁵Sustainability Appraisal Report for the Stroud District Local Plan Review – Draft Plan (2019)

⁶Sustainability Assessment for Additional Housing Consultation (October 2020)

⁷The Sustainability Appraisal Report for the Stroud District Local Plan Review : Presubmission Draft

⁸Green Party Response to the Stroud District Local Plan Review – Emerging Strategy January 2019

⁹Natural England's response to the Regulation 18 Consultation

¹⁰SDC's Statement of Community Involvement (SCI)

¹¹Clearlead Consulting Ltd Review of SDC Sustainability Appraisals (July 2021)

¹¹Natural England's Guide to assessing development proposals on agricultural land (Updated 5 February 2021)

¹²The National Planning Policy Framework

¹³'A Green Future: Our 25 Year Plan to improve the Environment 2018 plan

¹⁴Defra Code of Construction Practice for the Sustainable Management of Soils on Construction Sites

¹⁵Stroud District Council's Carbon Neutral 2030 Commitment

APPENDIX 1



12th February 2021

Wisloe Action Group

Our Ref: LC743_v4 Wisloe Action Group

Sent by email: wisloeaction@gmail.com

Dear Wisloe Action Group,

RE: TECHNICAL REVIEW OF AGRICULTURAL LAND CLASSIFICATION: LAND AT THE NARLES SLIMBRIDGE ESTATE, WISLOE

Further to your recent email and enclosure, please find the outcome of my technical review of an Agricultural Land Classification (ALC) grading of 'Land at the Narles Slimbridge Estate, Wisloe' by Soil Environment Services Limited (SES) on behalf of the Ernest Cook Trust and Gloucestershire County Council and reported on 13th September 2019 (SES reference SES/ECT&GCC/NSEW/#1).

Competency

This technical review has been carried out by [REDACTED] who is a Chartered Scientist (CSci) and a Fellow (F.I. Soil Sci) of the British Society of Soil Science (BSSS). Robert meets the requirements of the BSSS Professional Competency Standard (PCS) scheme for ALC (see BSSS PCS Document 2 '*Agricultural Land Classification of England and Wales*'¹). The BSSS PCS scheme is endorsed, amongst others, by the Department for Environment, Food and Rural Affairs (Defra), Natural England, the Science Council, and the Institute of Environmental Assessment and Management (IEMA).

ALC Review Guidance

The BSSS has produced a guidance note to help development planning and control professionals to evaluate ALC reports, 'Guidance Document 1: Working with Soil Guidance Note on Assessing Agricultural Land Classification Surveys in England and Wales'². A summary of this technical review following the BSSS validation process (pass/concern/fail) is given as **Appendix 1**. The reasoning for the scoring is given in the technical review below and in **Appendix 2**.

Technical Review and Conclusion

Sections 1, 2, and 3 of the SES ALC report are comprehensive and contain most of the information required in order to be able to validate the ALC grading of agricultural land at the Site. The ALC survey methodology

¹ British Society of Soil Science. Professional Competency Scheme Document 2 '*Agricultural Land Classification of England and Wales*'. Available online @ <https://www.soils.org.uk/sites/default/files/events/flyers/ipss-competency-doc2.pdf> Last accessed February 2021

² British Society of Soil Science (BSSS) (2021) '*Guidance Document 1: Working with Soil Guidance Note on Assessing Agricultural Land Classification Surveys in England and Wales*'. Available online @ [Microsoft Word - Assessing Agricultural Land Classification \(ALC\) - Final.docx \(soils.org.uk\)](#). Last accessed February 2021

has largely followed the ALC Guidelines³ and soil profiles at the approximately 77 hectare (ha) site have been examined to a depth of 1.2m with a hand-held soil auger at a density of 1 auger-bore per ha.

However, Section 4 'Fieldwork Results', and Appendix B 'Site Survey Field Notes', of the SES ALC report 'Fieldwork Results', do not provide adequate soil profile data, for example, by not distinguishing between medium clay loam and heavy clay loam, and the determination in Section 4.3 'In-field wetness class assessment' that a single type of soil (Type 1) across the site is in Wetness Class IV is inconclusive (see detailed technical review given as **Appendix 2**).

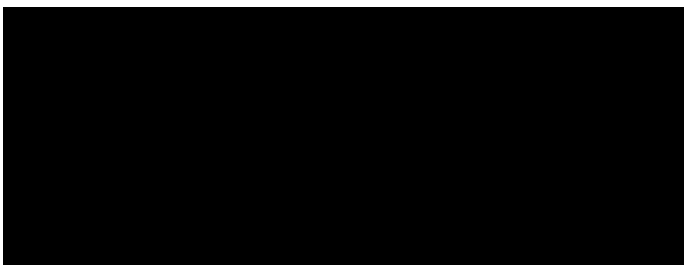
Based solely on the field notes and soil data reported in the SES report (I have not been on site), the assessment of Wetness Class IV cannot be substantiated against the criteria set out in Appendix 3 'Field Assessment of Soil Wetness Class' in the ALC Guidelines. Rather, the soil colours, soil textures and soil structures do not confirm the presence of a 'Slowly Permeable Layer' and, as presented in the SES report, indicate that Soil Type 1 is in Wetness Class I (well drained).

Therefore, with regard to Section 5 (page 13) of the SES report, the ALC grading of all the agricultural land at the site being in Subgrade 3b due to soil wetness i.e., as a result of the '*...combination of the topsoil texture (medium clay loam)*⁴, *Wetness Class IV and the number of Field Capacity Days (175.3)*...', according to Table 6 'Grade according to soil wetness' of the ALC Guidelines cannot be validated from the information given in the SES report.

If, as the information in the SES ALC report indicates, the Soil Type 1 is in Wetness Class I, then all the agricultural land at the site would be **Grade 2**, i.e., medium clay loam, Wetness Class I, and 175.3 FCD (re Table 6 of the ALC Guidelines). If this is the case, then all the agricultural land at the site would fall in the National Planning Policy Framework's (February, 2019) definition of 'Best and Most Versatile (BMV)' agricultural land (i.e., ALC Grade 1, Grade 2 and Subgrade 3a). For comparison, MAFF has determined Grade 2 on agricultural land with soils in the Badsey 1 association at Slimbridge, to the northwest of the site⁵, and given as **Appendix 3**.

My recommendation is to provide the determining authority (Stroud District Council) with this technical review in order that SDC can obtain technical advice on the SES ALC grading from Natural England, under the provision of Schedule 4(y) of the Town and County Planning (Development Management Procedure) (England) Order 2015 No. 595⁶.

Yours sincerely,



Enc

³ Ministry of Agriculture Fisheries and Food (October, 1988). Agricultural Land Classification of England and Wales: Revised Criteria for Grading the Quality of Agricultural Land'. Available online @ <http://publications.naturalengland.org.uk/publication/6257050620264448> Last accessed January 2021

⁴ SES only refer to medium clay loam on page 13 of the report.

⁵ Ministry of Agriculture, Fisheries and Food (1988) ALC at Slimbridge. Available online at [Agricultural Land Classification detailed Post 1988 ALC survey, Slimbridge - ALCB08998 \(naturalengland.org.uk\)](http://publications.naturalengland.org.uk/publication/6257050620264448) Last accessed January 2021

⁶ Schedule 4(y) of the Town and County Planning (Development Management Procedure) (England) Order (2015). Available online @ <https://www.legislation.gov.uk/uksi/2015/595/schedule/4/made> Last accessed January 2021

Appendix 1: Technical Review of Agricultural Land Classification

Following British Society of Soil Science (BSSS) 'Guidance Document 1: Working with Soil Guidance Note on Assessing Agricultural Land Classification Surveys in England and Wales'⁷

Report under review: Soil Environment Services Ltd (September 2019). Agricultural Land Classification: Ernest Cook Trust and Gloucestershire County Council – Land at the Narles Slimbridge Estate, Wisloe.

Technical reviewer [REDACTED] Director, Askew Land & soil limited.

Date of review: 11th February 2021

Reviewer comment in red text

Background			
		YES	NO
1	Is the company / author a specialist in ALC?	PASS	
2	Have published soil maps been mentioned?	PASS	
Climate data			
3	Is <i>interpolated</i> climate data included for the site (esp. Field Capacity Days (FCD), Moisture Deficits (MD) and Maximum grade on climate)?	PASS	
4	Is the data consistent with that expected for the area?	PASS	
Site and standalone limitations			
5	Have gradients, micro-relief and flooding been considered / acknowledged?	PASS	
Soils and interactive limitations			
6	Have topsoils and subsoils been field surveyed? References to soil pits, auger samples & lab samples should be included. No lab samples		CONCERN
7	Are the soil types clearly described, including reference to gleying, slowly permeable layers (SPL), soil wetness class (SWC) and drought? Soil profile data do not substantiate designation of a Slowly Permeable Layer / Wetness Class IV following Appendix 3 of the ALC Guidelines, 1988		FAIL
	Have the reasons for ALC grading been clearly described? ALC grade according to soil wetness has not been substantiated by soil data.		FAIL
9	Have soil structure and porosity been described? Soil wetness class has not been assigned correctly according to soil profile data provided.		FAIL

⁷ British Society of Soil Science (BSSS) (2021) 'Guidance Document 1: Working with Soil Guidance Note on Assessing Agricultural Land Classification Surveys in England and Wales'. Available online @ [Microsoft Word - Assessing Agricultural Land Classification \(ALC\) - Final.docx \(soils.org.uk\)](#). Last accessed February 2021

10	Have soils been described using Soil Survey Field Handbook (Hodgson 1997)?	PASS	
11	Have soils been described using Munsell8 soil colour notations?	PASS	
Conclusions and references			
12	Is there a table clearly showing areas of ALC grades?	PASS	
13	Is there a list of references (normally including Soil Survey of England and Wales mapping, the MAFF 1988 ALC guidelines, Munsell soil colour charts and the Soil Survey Field Handbook – Hodgson 1997)?	PASS	
14	Have the limitations been justified when concluding the ALC grade(s) on the site? Soil wetness class has not been assigned correctly according to soil profile data provided.		FAIL
Schedule of auger borings and soil pits			
15	Has a map of auger boring & soil pit locations been included?	PASS	
16	Have laboratory analyses been included to confirm topsoil particle size distribution? Clay loam not distinguished between medium or heavy.		FAIL
17	Has a schedule of auger boring information been provided? Soil profile data do not substantiate designation of a Slowly Permeable Layer / Wetness Class IV following Appendix 3 of the ALC Guidelines, 1988.		CONCERN
18	Do the auger borings show horizon depths, colours and textures?	PASS	
19	Do the auger boring records clearly show soil wetness class? No determination of wetness class per auger bore, and 'In-field wetness class assessment (Section 4.3) is incorrect based on soil profile data provided.		FAIL
20	Do the auger boring records clearly show topsoil stone content? Topsoil stone content does not distinguish stone sizes required for determining grade according to stone content (re Table 5 of the ALC Guidelines, 1988)		CONCERN
21	Do the auger boring records clearly show depth to gleying and depth to slowly permeable layer (SPL)? Soil profile data do not substantiate designation of a Slowly Permeable Layer / Wetness Class IV following Appendix 3 of the ALC Guidelines, 1988		FAIL
22	Do the auger boring records clearly show moisture balance (MB) values for drought (Wheat & Potatoes)? MB values not given for each auger-bore. A site-wide assessment for Type 1 is given as Appendix A		CONCERN
23	Has detailed soil pit information been provided in the report and do the pit descriptions show horizon depths, colours and textures?	PASS	
24	Do the soil pits / pit clearly show soil wetness class (WC)? Soil pit data does not substantiate designation of a Slowly Permeable Layer / Wetness Class IV following Appendix 3 of the ALC Guidelines, 1988		FAIL
25	Do the soil pits / pit clearly show moisture balance (MB) values for drought? A site-wide assessment for Type 1 is given as Appendix A		CONCERN
26	Do the soil pit / pits clearly show soil structure and porosity in the subsoil? A site-wide assessment for Type 1 is given in Section 4.3. Soil pit data does not substantiate designation of a Slowly Permeable Layer / Wetness Class IV following Appendix 3 of the ALC Guidelines, 1988		CONCERN

Appendix 2: Review of Field Assessment of Soil Wetness Class (re Appendix 3 of the ALC Guidelines⁸)

The SES ALC report has determined a single type of soil (Type 1) across the site, as described in Table 2 of the SES report, and reproduced in Table A.1 below. Following Appendix 3 of the ALC Guidelines, soil Type 1 cannot be in Wetness Class IV for the technical reasons given in Table A.1.

Table A.1: Assessment of SES Soil Type 1 against criteria set out in Appendix 3 ‘Field Guide to Assessing Soil Wetness’ in the ALC Guidelines (1988)

Soil Horizon	Type 1 Profile Description	Technical Comments
Horizon 1 (topsoil)	0-25 cm Light olive brown (2.5Y 5/4) slightly stony clay loam, no mottles; friable weak fine subangular blocky structure.	This is not a gleyed horizon due to Munsell colour and absence of mottles.
Horizon 2 (subsoil 1)	25-50cm Yellowish brown (10YR 5/4) slightly stony clay loam, few fine ochreous mottles; firm weak medium angular blocky structure.	This is not a gleyed horizon due to Munsell colour and only a few mottles, i.e., mottles occupy less than about 2 percent of the matrix or surface described ⁹ . It does not constitute a ‘Slowly Permeable Layer’ (no evidence of wetness in horizon above).
Horizon 3 (subsoil 2)	50-55 cm Olive yellow (2.5Y 6/6) moderately stony sandy clay loam, few fine ochreous mottles; single grain structure.	This is not a gleyed horizon due to Munsell colour and only a few mottles, i.e., mottles occupy less than about 2 percent of the matrix or surface described ¹⁰ . Single grain structure in a sandy clay loam is a combination which is very rare or do not occur (re Figure 11 of the ALC Guidelines). It does not constitute a ‘Slowly Permeable Layer’.
Horizon 4 (subsoil 3)	55 cm Boring terminated due to stoniness.	

In the absence of a Slowly Permeable Layer, and only few mottles in the subsoil to a depth of 55cm, this Type 1 soil profile is placed in **Wetness Class I** (re Table 13 of the ALC Guidelines).

Wetness Class I (well drained) is consistent with soils in the Badsey series, as described by the Soil Survey of England and Wales online¹¹. The SES ALC report describes how the SSEW National Soil Map (1:250,000) shows land at the site has soils in the Badsey association (511h), which comprises well drained calcareous and non-calcareous fine loamy soils over limestone gravel. These soils are developed in river terrace gravels. The SES ALC report describes the British Geological Survey map of superficial deposits (1:50,000) shows that most of the site is covered by Cheltenham Sand and Gravel, with some alluvium flanking the River Cam in the northeast. Most of the site is in Flood Zone 1, apart from land flanking the River Cam which is in Flood Zone II.

⁸ British Society of Soil Science. Professional Competency Scheme Document 2 ‘Agricultural Land Classification of England and Wales’. Available online @ <https://www.soils.org.uk/sites/default/files/events/flyers/ipss-competency-doc2.pdf> Last accessed January 2021

⁹ Colour and Mottling given in Hodgson, J. M. (ed.) (1997) Soil Survey Field Handbook. Technical Monograph No. 5. Silsoe.

¹⁰ Colour and Mottling given in Hodgson, J. M. (ed.) (1997) Soil Survey Field Handbook. Technical Monograph No. 5. Silsoe.

¹¹ Cranfield University ‘The Soils Guide’ (2021). Badsey 1 association and Badsey series. Available online @ www.landis.org.uk. Cranfield University. Last accessed January 2021

Appendix 3: Slimbridge: Agricultural Land Classification, September 1998

(RPT Job Number 89/98; FRCA File No EL14/1506)

Slimbridge
Agricultural Land Classification
September 1998

Resource Planning Team
Bristol
FRCA Western Region

RPT Job Number 89/98
FRCA File No EL14/1506



SLIMBRIDGE
AGRICULTURAL LAND CLASSIFICATION SURVEY

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Sample Point Location Map

Pit Descriptions

Boring Profile Data

Boring Horizon Data

Abbreviations and Terms used in Survey Data

SLIMBRIDGE

AGRICULTURAL LAND CLASSIFICATION SURVEY

INTRODUCTION

1 This report presents the findings of a detailed Agricultural Land Classification (ALC) survey of 1.8 ha of land to the west of Tynning Crescent Slimbridge. Field survey was based on 3 auger borings and 1 soil profile pit and was completed in September 1998.

2 The survey was conducted by the Resource Planning Team of FRCA Western Region on behalf of MAFF in its statutory role in the preparation of the Stroud District Local Plan.

3 Information on climate, geology and soils and from previous ALC surveys was considered and is presented in the relevant section. Apart from the published regional ALC map (MAFF 1997) which sets site at a reconnaissance scale as Grade 2, the site had not been surveyed previously. The current survey uses the Revised Guidelines and Criteria for grading the quality of agricultural land (MAFF 1988) and supersedes any previous ALC survey. Grade descriptions are summarised in Appendix I.

4 At the time of survey, land cover in the northern field was grassland and the southern field had been sown to oilseed rape.

SUMMARY

5 The distribution of ALC grades is shown on the accompanying 1:10,000 scale ALC map. The detail of information shown at this scale is appropriate to the intensity of field survey but could be misleading if enlarged or applied to small areas. Areas are summarised in the Table 1.

Table 1 Distribution of ALC grades Slimbridge

Grade	Area (ha)	% Surveyed Area (1.8 ha)
2	1.8	100
Total site area	1.8	

6 All of the site has been mapped as Grade 2 with heavy clay loam topsoils lying over stony lower subsoils. These soils experience a minor workability limitation imposed by the heavy clay loam topsoil.

CLIMATE

7 Estimates of climatic variables for this site were derived from the published agricultural climate dataset: Climatological Data for Agricultural Land Classification.

(Meteorological Office 1989) using standard interpolation procedures Data for key points around the site are given in Table 2 below

8 Since the ALC grade of land is determined by the most limiting factor present overall climate is considered first because it can have an overriding influence by restricting land to a lower grade despite more favourable site and soil conditions Parameters used for assessing overall climate are accumulated temperature a measure of relative warmth and average annual rainfall a measure of overall wetness The results shown in Table 2 indicate that there is no overall climatic limitation

9 Climatic variables also affect ALC grade through interactions with soil conditions The most important interactive variables are Field Capacity Days (FCD) which are used in assessing soil wetness and potential Moisture Deficits calculated for wheat and potatoes which are compared with the moisture available in each profile in assessing soil droughtiness limitations These are described in later sections

Table 2 Climatic Interpolations Slimbridge

Grid Reference	SO 740 031
Altitude (m)	15
Accumulated Temperature (day C)	1515
Average Annual Rainfall (mm)	783
Overall Climatic Grade	1
Field Capacity Days	174
Moisture deficit (mm) Wheat	102
Potatoes	95

RELIEF

10 Altitude of the site is at 15 metres and site is generally flat

GEOLOGY AND SOILS

11 The underlying geology of the site is shown on the published geology map (IGS 1972) as recent gravels of the third terrace of the River Severn The recent ALC survey found soils developed on these gravels

12 Soils were mapped by the Soil Survey of England and Wales at a reconnaissance scale of 1 250 000 (SSEW 1983) as Badsey 1 Association


13 Badsey 1 Association is described as well drained calcareous and non calcareous fine loamy soils over limestone gravel with some fine loamy soils and fine loamy soils over gravel The recent survey found soils typical of the Badsey 1 Association

AGRICULTURAL LAND CLASSIFICATION

14 The distribution of ALC grades found by the current survey is shown on the accompanying 1:10 000 scale map and areas are summarised in Table 1. The detail of information shown at this scale is appropriate to the intensity of field survey but could be misleading if enlarged or applied to small areas.

Grade 2

15 All of the site has been mapped as Grade 2 very good quality agricultural land. Heavy clay loam topsoils were found overlying clay subsoils. The lower subsoils were impenetrable to the auger and a soil profile pit was dug to establish the stone content and structure of these soils. This found that the lower subsoils contained around 40% hard rock by volume in a clay matrix. The soils are well drained and were assessed as Wetness Class I (see Appendix 2). The high stone content of the soils does restrict the available water to growing crops; however, the overriding limitation of these soils is minor workability limitation imposed by the heavy clay loam topsoil and the field capacity day value for the site.


Resource Planning Team
FRCA Bristol
September 1998

REFERENCES

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Classification Meteorological Office Bracknell

SOIL SURVEY OF ENGLAND AND WALES (1983) Sheet 5 Soils of South West England
1 250 000 scale SSEW Harpenden

SOIL SURVEY OF ENGLAND AND WALES (1984) Soils and Their Use in South West
England Bulletin No 14 SSEW Harpenden

APPENDIX I

DESCRIPTION OF GRADES AND SUBGRADES

Grade 1 excellent quality agricultural land

Land with no or very minor limitations to agricultural use. A very wide range of agricultural and horticultural crops can be grown and commonly include top fruit, soft fruit, salad crops and winter harvested vegetables. Yields are high and less variable than on land of lower quality.

Grade 2 very good quality agricultural land

Land with minor limitations which affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown but on some land in the grade there may be reduced flexibility due to difficulties with the production of the more demanding crops such as winter harvested vegetables and arable root crops. The level of yield is generally high but may be lower or more variable than Grade 1.

Grade 3 good to moderate quality agricultural land

Land with moderate limitations which affect the choice of crops, timing and type of cultivation, harvesting or the level of yield. Where more demanding crops are grown, yields are generally lower or more variable than on land in Grades 1 and 2.

Subgrade 3a good quality agricultural land

Land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals, or moderate yields of a wide range of crops including cereals, grass, oilseed rape, potatoes, sugar beet and the less demanding horticultural crops.

Subgrade 3b moderate quality agricultural land

Land capable of producing moderate yields of a narrow range of crops, principally cereals and grass, or lower yields of a wider range of crops or high yields of grass which can be grazed or harvested over most of the year.

Grade 4 poor quality agricultural land

Land with severe limitations which significantly restrict the range of crops and/or level of yields. It is mainly suited to grass with occasional arable crops (eg cereals and forage crops) the yields of which are variable. In most climates, yields of grass may be moderate to high but there may be difficulties in utilisation. The grade also includes very droughty arable land.

Grade 5 very poor quality agricultural land

Land with very severe limitations which restrict use to permanent pasture or rough grazing except for occasional pioneer forage crops

Source MAFF (1988) Agricultural Land Classification of England and Wales Revised Guidelines and Criteria for Grading the Quality of Agricultural Land MAFF Publications Alnwick

APPENDIX II

DEFINITION OF SOIL WETNESS CLASSES

Soil wetness is classified according to the depth and duration of waterlogging in the soil profile

Wetness Class I

The soil profile is not wet within 70 cm depth for more than 30 days in most years

Wetness Class II

The soil profile is wet within 70 cm depth for 31-90 days in most years or if there is no slowly permeable layer within 80 cm depth it is wet within 70 cm for more than 90 days but not wet within 40 cm depth for more than 30 days in most years

Wetness Class III

The soil profile is wet within 70 cm depth for 91-180 days in most years or if there is no slowly permeable layer within 80 cm depth it is wet within 70 cm for more than 180 days but only wet within 40 cm depth for between 31 and 90 days in most years

Wetness Class IV

The soil profile is wet within 70 cm depth for more than 180 days but not within 40 cm depth for more than 210 days in most years or if there is no slowly permeable layer within 80 cm depth it is wet within 40 cm depth for 91-210 days in most years

Wetness Class V

The soil profile is wet within 40 cm depth for 211-335 days in most years

Wetness Class VI

The soil profile is wet within 40 cm depth for more than 335 days in most years

Notes The number of days specified is not necessarily a continuous period

In most years is defined as more than 10 out of 20 years

Source Hodgson J M (Ed) (1997) Soil Survey Field Handbook Soil Survey Technical Monograph No 5 Silsoe

APPENDIX III

ABBREVIATIONS AND TERMS USED IN SURVEY DATA

Soil pit and auger boring information collected during ALC survey is held on a computer database and is reproduced in this report. Terms used and abbreviations are set out below. These conform to definitions contained in the Soil Survey Field Handbook (Hodgson 1997)

1 Terms used on computer database in order of occurrence

GRID REF National 100 km grid square and 8 figure grid reference

LAND USE At the time of survey

WHT	Wheat	SBT	Sugar Beet	HTH	Heathland
BAR	Barley	BRA	Brassicas	BOG	Bog or Marsh
OAT	Oats	FCD	Fodder Crops	DCW	Deciduous Wood
CER	Cereals	FRT	Soft and Top Fruit	CFW	Coniferous Woodland
MZE	Maize	HRT	Horticultural Crops	PLO	Ploughed
OSR	Oilseed Rape	LEY	Ley Grass	FLW	Fallow (inc Set aside)
POT	Potatoes	PGR	Permanent Pasture	SAS	Set Aside (where known)
LIN	Linseed	RGR	Rough Grazing	OTH	Other
BEN	Field Beans	SCR	Scrub		

GRDNT Gradient as estimated or measured by hand held optical clinometer

GLEYSPL Depth in centimetres to gleying or slowly permeable layer

AP (WHEAT/POTS) Crop adjusted available water capacity

MB (WHEAT/POTS) Moisture Balance (Crop adjusted AP - crop potential MD)

DRT Best grade according to soil droughtiness

If any of the following factors are considered significant Y will be entered in the relevant column

MREL	Microrelief limitation	FLOOD	Flood risk	EROSN	Soil erosion risk
EXP	Exposure limitation	FROST	Frost prone	DIST	Disturbed land
CHEM	Chemical limitation				

LIMIT The main limitation to land quality. The following abbreviations are used

OC	Overall Climate	AE	Aspect	EX	Exposure
FR	Frost Risk	GR	Gradient	MR	Microrelief

FL	Flood Risk	TX	Topsoil Texture	DP	Soil Depth
CH	Chemical	WE	Wetness	WK	Workability
DR	Drought	ER	Erosion Risk	WD	Soil Wetness/Droughtiness
ST	Topsoil Stoniness				

TEXTURE Soil texture classes are denoted by the following abbreviations

S	Sand	LS	Loamy Sand	SL	Sandy Loam
SZL	Sandy Silt Loam	CL	Clay Loam	ZCL	Silty Clay Loam
ZL	Silt Loam	SCL	Sandy Clay Loam	C	Clay
SC	Sandy clay	ZC	Silty clay	OL	Organic Loam
P	Peat	SP	Sandy Peat	LP	Loamy Peat
PL	Peaty Loam	PS	Peaty Sand	MZ	Marine Light Silts

For the sand loamy sand sandy loam and sandy silt loam classes the predominant size of sand fraction will be indicated by the use of the following prefixes

F	Fine (more than 66% of the sand less than 0.2mm)
M	Medium (less than 66% fine sand and less than 33% coarse sand)
C	Coarse (more than 33% of the sand larger than 0.6mm)

The clay loam and silty clay loam classes will be sub divided according to the clay content **M** Medium (< 27% clay) **H** heavy (27-35% clay)

MOTTLE COL Mottle colour using Munsell notation

MOTTLE ABUN Mottle abundance expressed as a percentage of the matrix or surface described

F few <2% **C** common 2-20% **M** many 20-40% **VM** very many 40%+

MOTTLE CONT Mottle contrast

F	faint indistinct mottles evident only on close inspection
D	distinct mottles are readily seen
P	Prominent mottling is conspicuous and one of the outstanding features of the horizon

PED COL Ped face colour using Munsell notation

GLEYS If the soil horizon is gleyed a **Y** will appear in this column If slightly gleyed an **S** will appear

STONE LITH Stone Lithology One of the following is used

HR	All hard rocks and stones	SLST	Soft oolitic or dolimitic limestone
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CH	Chalk	FSST	Soft fine grained sandstone
ZR	Soft argillaceous or silty rocks	GH	Gravel with non porous (hard) stones
MSST	Soft medium grained sandstone	GS	Gravel with porous (soft) stones
SI	Soft weathered igneous or metamorphic rock		

Stone contents are given in % by volume for sizes >2cm >6cm and total stone >2mm

STRUCT The degree of development size and shape of soil peds are described using the following notation

<u>Degree of development</u>	WA	Weakly developed Adherent	WK	Weakly developed
	MD	Moderately developed	ST	Strongly developed
<u>Ped size</u>	F	Fine	M	Medium
	C	Coarse	VC	Very coarse
<u>Ped Shape</u>	S	Single grain	M	Massive
	GR	Granular	AB	Angular blocky
	SAB	Sub angular blocky	PR	Prismatic
	PL	Platy		

CONSIST Soil consistence is described using the following notation

L	Loose	VF	Very Friable	FR	Friable	FM	Firm
VM	Very firm	EM	Extremely firm		EH		Extremely Hard

SUBS STR Subsoil structural condition recorded for the purpose of calculating profile droughtiness **G** Good **M** Moderate **P** Poor

POR Soil porosity If a soil horizon has poor porosity with less than 0.5% biopores >0.5mm a **Y** will appear in this column

IMP If the profile is impenetrable to rooting a **Y** will appear in this column at the appropriate horizon

SPL Slowly permeable layer If the soil horizon is slowly permeable a **Y** will appear in this column

CALC If the soil horizon is calcareous with naturally occurring calcium carbonate exceeding 1% a **Y** will appear this column

2 Additional terms and abbreviations used mainly in soil pit descriptions

STONE ASSESSMENT

_VIS	Visual	S	Sieve	D	Displacement
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MOTTLE SIZE

EF	Extremely fine <1mm	M	Medium 5-15mm
VF	Very fine 1-2mm	C	Coarse >15mm
F	Fine 2-5mm		

MOTTLE COLOUR May be described by Munsell notation or as ochreous (OM) or grey (GM)

ROOT CHANNELS In topsoil the presence of rusty root channels should also be noted

MANGANESE CONCRETIONS Assessed by volume

N	None	M	Many	20-40%
F	Few <2%	VM	Very Many	>40%
C	Common 2-20%			

POROSITY

P	Poor	less than 0.5% biopores at least 0.5mm in diameter
G	Good	more than 0.5% biopores at least 0.5mm in diameter

ROOT ABUNDANCE

The number of roots per 100cm ²		Very Fine and Fine	Medium and Coarse
F	Few	1-10	1 or 2
C	Common	10-25	2-5
M	Many	25-200	>5
A	Abundant	>200	

ROOT SIZE

VF	Very fine	<1mm	M	Medium	2-5mm
F	Fine	1-2mm	C	Coarse	>5mm

HORIZON BOUNDARY DISTINCTNESS

Sharp	<0.5cm	Gradual	6-13cm
Abrupt	0.5-2.5cm	Diffuse	>13cm
Clear	2.5-6cm		

HORIZON BOUNDARY FORM Smooth wavy irregular or broken *

* See Soil Survey Field Handbook (Hodgson 1997) for details

SITE NAME Slimbridge		PROFILE NO Pit 1	SLOPE AND ASPECT 0	LAND USE OSR	Av Rainfall 783 mm	PARENT MATERIAL 3rd Terrace Gravels	
JOB NO 89/98		DATE 22/9/98	GRID REFERENCE SO 739 031	DESCRIBED BY GMS	ATO 1515 day C	PSD SAMPLES TAKEN	
					FC Days 174		
					Climatic Grade 1		
					Exposure Grade 1		



Horizon No	Lowest Av Depth (cm)	Texture	Matrix (Ped Face) Colours	Stoniness Size Type and Field Method	Mottling Abundance Contrast Size and Colour	Mangan Concs	Structure Ped Development Size and Shape	Consistence	Structural Condition	Pores (Fissures)	Roots Abundance and Size	Calcium Carbonate Content	Horizon Boundary Distinctness and form
1	31	HCL	10YR53	1%HR 2 m 4%HR>2mm (s+d)	None	None					FVF		Clear Smooth
2	48	C	10YR54	5% HR (is)	None	None	MDCSAB	Friable	Mod	Good	FVF		Clear Smooth
3	70	C	10YR54	1%HR>2cm 36% HR>2mm (s+d)	FDFO 10YR56	Few	WKMSAB	Friable	Good	Good	FVF		Gradual Smooth
4	80+	C	10YR54	1%HR 2 cm 41%HR>2mm (s+d)	FDFO 10YR56	Few	WKMSAB	Friable	Good	Good	None seen		

Profile Gleyed From	Not gleyed	Available Water	Wheat	146 mm	Final ALC Grade	2
Slowly Permeable Horizon From	No spl		Potatoes	110 mm	Main Limiting Factor(s)	Workability
Wetness Class	I	Moisture Deficit	Wheat	102 mm		
Wetness Grade	2		Potatoes	95 mm		
		Moisture Balance	Wheat	44 mm		
			Potatoes	15 mm		
		Droughtiness Grade	1	(Calculated to 120 cm)	Remarks	

Slimbridge

Sample Point Map

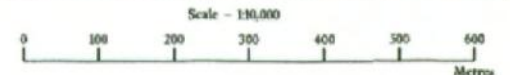
Legend

-  Location of soil pit
-  Location of auger sample point

 Boundary of survey area

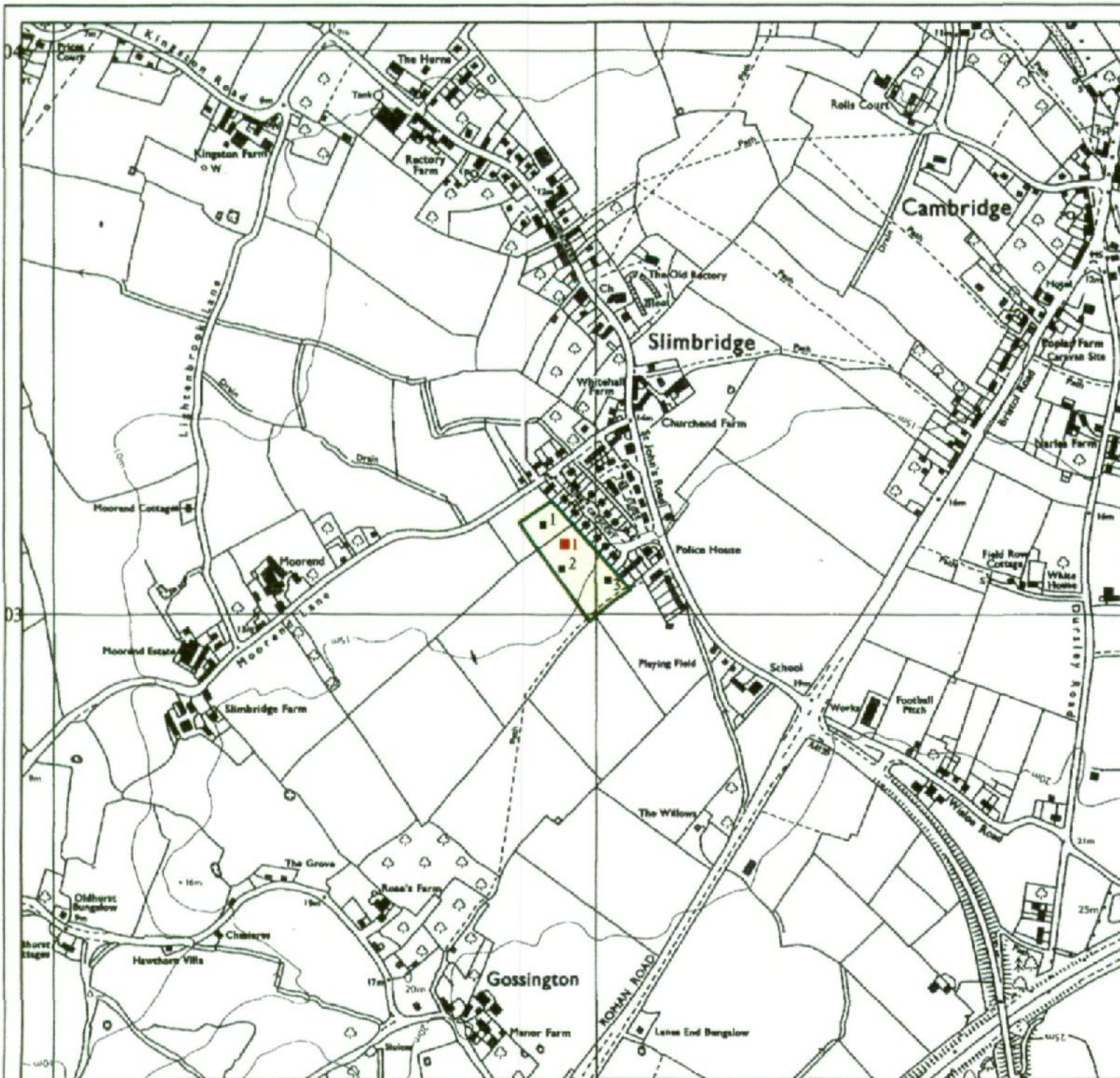
 Agricultural land not surveyed

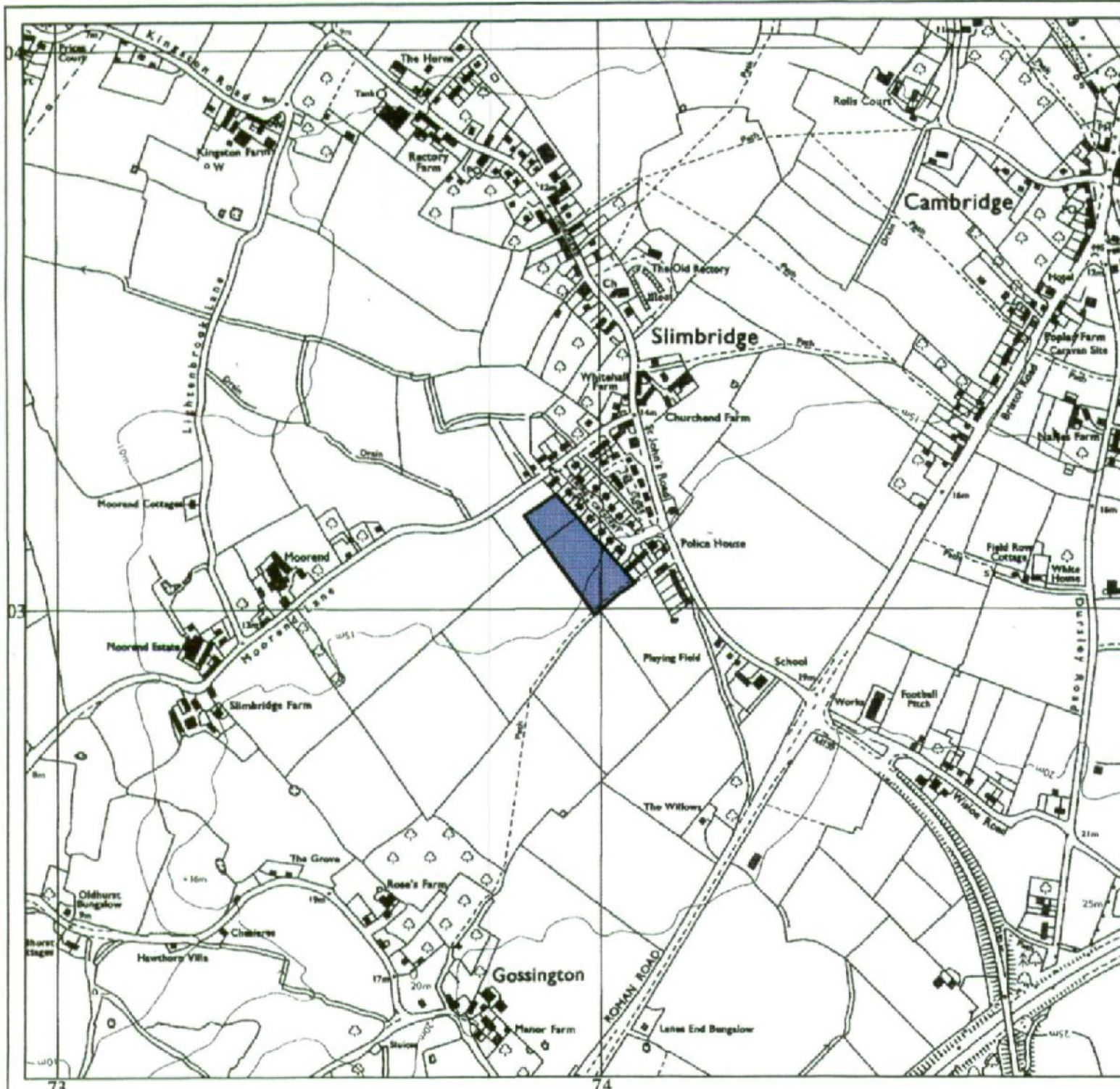
 Other land



Further details contained in MAFF (1988) Agricultural Land Classification of England and Wales - Revised guidelines and criteria for grading the quality of agricultural land. Maf (publications), London SE99 7TP. The information is accurate at base map scale but any enlargement would be misleading. Reproduction in whole or in part by any means is prohibited without the prior permission of MAFF.

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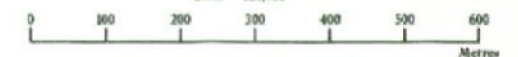
Agricultural Land Classification

Slimbridge

Legend

	Quality	Area (ha)
Grade 1	Excellent	0.0
Grade 2	Very Good	1.8
Grade 3a	Good	0.0
Grade 3b	Moderate	0.0
Grade 4	Poor	0.0
Grade 5	Very Poor	0.0
	Agricultural land not surveyed	0.0
	Other land	0.0
Boundary of survey area		
Total agricultural land area		1.8
Total survey area		1.8
* Not present within survey area		

Scale - 1:30,000



Further details contained in MAFF (1988) Agricultural Land Classification of England and Wales - Revised guidelines and criteria for grading the quality of agricultural land. MAFF (publications), London SE99 7TP. The information is accurate at base map scale but any enlargement would be misleading. Reproduction in whole or in part by any means is prohibited without the prior permission of MAFF.

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APPENDIX 2

WAG Communications with Stroud District Council & Associated Correspondence

1. WAG and SDC Correspondence

From: wisloeaaction@gmail.com

Date: Sat, 20 Feb 2021 at 13:25

Subject: Local Plan - PS37 Wisloe Important Evidence

To: <REDACTED@stroud.gov.uk>

Dear REDACTED

Wisloe Action Group (WAG) would like to make you aware of critical Local Plan information that impacts, in particular, on SDC CN2030 commitments and sustainability of proposed site PS37 Wisloe.

You will be aware that protection of Agricultural Land Classification (ALC) 1, 2 & 3a, termed Best and Most Versatile (BMV) by Natural England, is a fundamental component of the SDC CN2030 plan. It also features as a core requirement of the National Planning Policy Framework (NPPF).

- Natural England overview of ALC identifies PS37 Wisloe as one of very few significant areas of Grade 2 land in Stroud District.
- PS37 Wisloe site promoters survey Sept 2019 stated ALC Grade 3b.
- SDC accepted this finding as evidence without expert review.
- WAG therefore commissioned their own expert review (see attached).
- Findings of expert review state PS37 promoter report has basic field work and technical errors. Report does not meet Natural England required standards.
- Expert review indicates that when PS37 errors are corrected the whole site is confirmed to be **ALC Grade 2 (BMV) as per existing Natural England site overview (see link below)**.
- SDC used the erroneous report findings to score the site, complete two sustainability appraisals, other surveys and two public consultations.
- Retaining site PS37 in the Draft Local Plan risks failure at inspection and does not meet CN2030 commitments.
- **Expert review recommendation is referral to Natural England**

"My recommendation is to provide the determining authority (Stroud District Council) with this technical review in order that SDC can obtain technical advice on the SES ALC grading from Natural England, under the provision of Schedule 4(y) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 No. 595".

We look forward to receiving your response.

Kind Regards,

REDACTED Wisloe Action Group (WAG)

Wisloe Action Group was formed to represent our community's views in response to Stroud District Council's Draft Local Plan public consultation process.

Natural England Agricultural Land Classification Map South West Region (ALC006) - [Agricultural Land Classification Map South West Region - ALC006 \(naturalengland.org.uk\)](#)

From: <REDACTED@[stroud.gov.uk](mailto:REDACTED@stroud.gov.uk)>

Date: Mon, 1 Mar 2021 at 16:06

Subject: RE: Local Plan - PS37 Wisloe Important Evidence

To: <wisloeaction@gmail.com>

Dear REDACTED ,

Thank you for your email.

We have forwarded your email and attachment to the promoters of Wisloe for them to provide an initial response to the Council.

We then intend to contact Natural England for their advice on this matter.

Regards

REDACTED

Head of Planning Strategy

Stroud District Council

Ebley Mill, Ebley Wharf
Stroud, Gloucestershire. GL5 4UB

T [01453 766321](tel:01453766321)

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