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Stroud District Council

WISLOE GREEN PROPOSED DEVELOPMENT

22 JAN 2020

21st January 2020

Our family moved to Slimbridge around [Redacted] to enjoy a more relaxed and rural environment. We are very disturbed by the proposed development in Slimbridge Parish and have some major concerns. The document below highlights my thoughts and concerns with the development which I strongly oppose.

ENVIRONMENTAL - CARBON NEUTRAL 2030 (CN2030)

Environmental issues have a huge importance to my generation and the proposed development in the Slimbridge Parish will have a massive impact on the area across the full spectrum of environmental considerations.

The Draft Local Plan was produced in advance of CN2030 and the Proposed site in Slimbridge Parish falls short across numerous policies within CN2030.

The Stroud District Green Party state

"The current consultation was launched in advance of the District Council declaring a climate emergency and committing itself, alongside other progressive local authorities, to reaching carbon neutrality by 2030. Attaining carbon neutrality by 2030 will have challenging implications for our revised local plan. It will require setting aside sites and policies to encourage significant additional renewable energy generation, including in appropriate locations within the AONB. New houses will need to be future proof and carbon zero, which will also reduce future energy bills and boost our local skills base in low carbon building. Reducing travel and modal shifts in transport will be important, transport needs to have an inbuilt hierarchy, which prioritises those modes of transport with the least greenhouse gas emissions (walking, cycling, buses and trains, as well as enabling the growth of electric vehicles and upcoming new transport technologies). Additional high-quality agricultural land will need to be retained for human food production and other land for carbon sequestration.

If well planned all these changes can make our district a cheaper, safer, more attractive, more communal, more biodiverse and resilient place to live.

The Green Party objects to the Tory Government imposed demand that land is allocated for 12,800 additional homes by 2031. We believe this figure has been calculated using a flawed methodology and is undeliverable without significant damage to our environment and communities. We believe that if land is allocated within Stroud District to meet the housing needs of Gloucester City, then this number should be deducted from, rather than additional to, the numbers being forced upon Stroud District Council.

The Council needs more powers to force developers to build on brownfield sites and smaller, affordable homes. We are aware that the greatest need is and will be for both young people and young families as well as an increasing elderly population."

The proposed development will consume high quality agricultural land whilst increasing emissions through higher commute miles and private car usage.

SDC Policy CP14 High quality sustainable development states: -

High quality development, which protects, conserves and enhances the built and natural environment, will be supported where it achieves the following:

- 2. No unacceptable levels of air, noise, water, light or soil pollution or exposure to unacceptable risk from existing or potential sources of pollution. Improvements to soil and water quality will be sought through the remediation of land contamination, the provision of SuDS and the inclusion of measures to help waterbodies to meet good ecological status*
- 3. Adequate water supply, foul drainage and sewage capacity to serve the development and satisfactory provision of other utilities, transport and community infrastructure*
- 4. No increased risk of flooding on or off the site, and inclusion of measures to reduce the causes and impacts of flooding as a consequence of that development*
- 5. An appropriate design and appearance, which is respectful of the surroundings, including the local topography, built environment and heritage*
- 7. No unacceptable adverse effect on the amenities of neighbouring occupants*
- 8. Contribute to the retention and enhancement of important landscape & geological features, biodiversity interests (including demonstrating the relationship to green infrastructure on site and wider networks)*
- 9. Contribute to a sense of place both in the buildings and spaces themselves and in the way in which they integrate with their surroundings including appropriate landscaping, biodiversity net gain, appropriate open space, sport and amenity space provision*
- 11. Efficiency in terms of land use, achieving higher development densities in locations that are more accessible by public transport and other non-car modes and where higher densities are compatible with the character of the area and the setting of the development*
- 14. It is at a location that is near to essential services and good transport links to services by means other than motor car.*

The proposed site in the Slimbridge Parish falls short on items above as the essential services are located in Cam and Dursley and the train station is only really accessible by car, and this facility is at full capacity.

Sustainability Appraisal Report for the Stroud Draft Local Plan 65 November 2019 SA10 possess the question

SA 10.2: Does the Plan promote more sustainable transport patterns and reduce the need to travel, particularly in areas of high congestion, including public transport, walking and cycling?

SA 10.3: Does the Plan promote more sustainable transport patterns in rural areas?

With the average commute distance being 17km and essential services being some miles away cycling or walking is not realistic. Public transport continues to be unpopular with only 3% of the population utilising it regularly so the car will remain a necessity not just for commuters but families, shoppers etc.

The proposed development In Slimbridge Parish falls significantly short in both areas.

Conclusion

The proposed development In Slimbridge Parish falls short in so many areas highlighted within CP14 and in particular CN2030 that it is difficult to see how it can conceivably stay within the local plan.

In excess of 3000 new homes – this is the total number of new homes either planned, in planning, or proposed to be built within Cam and Slimbridge Parishes making it the single largest house concentration in the district. The only separation between the Cam and the proposed Slimbridge Parish developments will be the M5 motorway which can hardly be classified as a clear and natural divide. Whilst assessing the impact on the environment, service infrastructure and road infrastructure it is only right for SDC to consider this as one big development and not to dilute the issues by stating that it is two!

Site Selection – The development in Slimbridge Parish was not in the original 2017 consultation and therefore has not been selected in a fully evidence-based manner. Stroud District Council (SDC) included the site only after discussions with Ernest Cook Trust and Gloucester County Council. SDC (with the support of ECT and GCC) have subsequently built an evidence base to support their preferences which contradicts many of their policy statements. Residents feedback & preferences (dispersal) have been ignored as have many of SDC's statements within the 2017 consultation document.

Site submission process

Section 4.6. states:

All submissions will require the completion of a Site Submission Form, setting out the key information required, available as a downloadable proforma (Appendix C) on the Council's Consultation Hub during the Call for Sites period. An individual submission is required for each site submitted and will need to be accompanied by a site location plan, on an Ordnance Survey base, clearly identifying the site boundaries and access to the site.

From the evidence on the SDC website, this process was not followed. The submission for all the sites consisted of one e mail from Gloucestershire County Council and two maps, one each for the GCC and ECT land.

Coalescence – SDC policy ES7. Paragraph 6.43 notes that “the principle pressure on the landscape arising from new development is erosion of the separate identity, character and functional amenity of settlements and the setting, and impacts on the open countryside”. The proposed development will coalesce with Slimbridge, Gossington and Cambridge into a single amorphous town. Furthermore, the expansion of Cam will effectively result in one urban sprawl from the Cotswold ANOB right through to the Severn Valley. The M5 motorway cannot be considered a natural break between the two settlements and therefore, this goes against all principles of good planning

Sustainability Appraisal Report for the Stroud Draft Local Plan 65 November 2019
possess the questions

SA 5.3: Does the Plan safeguard and enhance the identity of the District's existing communities and settlements?

SA8, 8.4: Does the Plan prevent coalescence between settlements?

SA 8.5: Does the Plan protect and enhance the District's natural environment assets.

The proposed development fails to meet any of the above criteria.

Agricultural Land Classification - NPPF 170 states “*Planning policies and decisions should contribute to and enhance the natural and local environment by: 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*”

Natural England classifies the land within Slimbridge Parish as Grade 2 – (very good agricultural land) and therefore should not be considered for development. The land in question has produced crops of high quality and high yield which contrasts with the recent suggestion of regrading the land to 3b in the recent survey commissioned by the ECT & GCC.

SA 13.5 asks, Does the Plan reduce the loss of soil and high grade agricultural land to development? It does not.

Conservation – NPPF 175 states; “*When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*

There are records and sightings of British Trust for Ornithology (BTO) Red Data listed birds including Curlew and Lapwing. These birds require large open plains to feed and roost. In addition to this European Nightjar, Lesser Redpoll, Long Eared Bats, Dormice and Palmate Newts have been sighted in this area all of which are

highly protected. SDC's Ecologic appraisal recognise these sightings and conclude that further in-depth surveys will need to be undertaken.

This land has an important role in the Ecology of this area and should be preserved accordingly.

Sustainability Appraisal of Stroud District Council's Local Plan Review 2019 possess the following questions: -

SA 7.1: Does the Plan avoid adverse effects on designated and undesignated biodiversity and geodiversity assets within and outside the District, including the net loss and fragmentation of green infrastructure and damage to ecological networks?

SA 7.2: Does the Plan outline opportunities for improvements to the conservation, connection and enhancement of ecological assets, particularly at risk assets?

SA 7.3: Does the Plan provide and manage opportunities for people to come into contact with resilient wildlife places whilst encouraging respect for and raising awareness of the sensitivity of such locations?

The proposed development does not.

Pollution Levels – NPPF 180 States *“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development”.*

The M5, A38, A4135 & railway impacts on current and future residents with highly toxic gases which cannot be mitigated. This will only increase with the proposed developments at Cam & Slimbridge Parish producing around 3000 further commute journeys. There are no feasible measures available that will protect future residents from these toxic fumes being that they will sandwich between 3 major roads and a rail track.

Sustainability Appraisal of Stroud District Council's Local Plan Review 2019 possess the following questions: -

SA 5.1: Does the Plan help to improve residential amenity (including potential to reduce light, smell and noise pollution) and sense of place?

SA 5.2: Does the Plan help to improve the satisfaction of people with their neighbourhoods as places to live and encourage ownership?

The proposed development does not.

Impact to OUR Rural Community - The Stroud area is officially designated a Rural District with the Severn Vale being the most rural part of the District. SDC's Core Strategy states that is “aims to protect and enhance the natural and built environment of the district”. This proposal will destroy the very nature of what makes it a wonderful place to live.

SA 8.2: Does the Plan prohibit inappropriate development that will have an adverse effect on the character of the District's countryside and settlements?

SA 8.3: Does the Plan promote the accessibility of the District's countryside in a sustainable and well-managed manner?

The proposed development does not.

Impact on views from the Area of Outstanding National Beauty (AONB). The nearest part of the AONB is at Stinchcombe Hill approx. 1.5km away. The proposed settlement will ruin views from both the Cotswold and Forest of Dean AONB's in stark contrast to SDC's commitment to protect these areas and views.

SA 8.1: Does the Plan protect and enhance the District's sensitive and special landscapes (including the Cotswolds AONB), and townscapes?

SA 8.2: Does the Plan prohibit inappropriate development that will have an adverse effect on the character of the District's countryside and settlements?

The proposed development does not.

Noise Levels - NPPF 180 states; *"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life60; b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason";*

Sandwiched between the M5, A38, A4135, & the Railway Line, noise levels have been measured well beyond permitted levels (50 db). The recent survey undertaken on behalf of ECT and GCC show levels in excess of 80 dB.

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The proposed development does not

Flood Risk - NPPF 155. State *"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere"*

Slimbridge has nationally recognised issues with foul and water run offs which will surely be increased massively with the proposed development. The building of 1500 new homes will remove the natural land drainage benefits of open farmland and create massive amounts of both waste and run off water. Little mention has been made about this in the development proposal and the cost to deal with this factor could be huge.

SA 12.1: Does the Plan reduce the risk of flooding from all sources including rivers, watercourses and sewer flooding to people and property?

SA 12.2: Does the Plan minimise development in areas prone to flood risk and areas prone to increasing flood risk elsewhere, taking into account the impacts of climate change.

The proposed development does not.

Position within the District – NPPF 104 States “Planning policies should: a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;” The majority of SDC’s projected delivery are in the South of the District whilst the majority of employment is to the north of the district. SDC’s own Settlement Role and Functions Study in 2018 shows that the Berkeley Vale already has the highest commuter miles of the district, the fewest jobs, some of the lowest level of amenities and infrastructure which results in the highest level of car ownership. Alternative sites closer to the main employment centres would be more appropriate than two large sites in the south.

Sustainability Appraisal Report for the Stroud Draft Local Plan 65 November 2019 possess the questions

SA 10.2: Does the Plan promote more sustainable transport patterns and reduce the need to travel, particularly in areas of high congestion, including public transport, walking and cycling

SA 10.3: Does the Plan promote more sustainable transport patterns in rural areas

The proposed development does not

Water Quality – highlighted by the developers as being a potential problem.

SA 11.1: Does the Plan seek to avoid deterioration and where possible improve the water quality of the district’s rivers and inland water?

SA 11.2: Does the Plan enable the use of recycled water and generally reduce the need to make use of water resources?

The proposed development does not do any of these.

Rural Settlement Classifications – SDC’s own recommendations are to priorities Tier 1 and Tier 2 areas (towns and large villages) whilst Slimbridge is Tier 3b and Cambridge Tier 4. SDC’s own Settlement Role and Functions Study in 2018 states that Slimbridge Village “may benefit from some planned development, targeted and

scaled to meet local housing needs". If it is now SDC's policy to build on or near Tier 3b and 4 settlements this then surely opens for consideration a multitude of sites previously disregarded due to them being lower Tier Settlements. Revisiting these settlements would provide the opportunity for the preferred dispersal option of house building

SA 8.2: Does the Plan prohibit inappropriate development that will have an adverse effect on the character of the District's countryside and settlements?

The proposed development does not.

Housing requirements – the government target is set at 638 dwellings per annum for SDC (12,760 over 20 years) but the Draft Plan 2018 (page 193) shows a total of 15,298 new homes? Population growth during the next 20 years is expected to be 20,000 which does not require 15,300 new homes!

To help to diversify opportunities for builders and increase the number of schemes that can be built-out quickly to meet housing need, the draft revised **NPPF states that at least 20% of the sites allocated for housing through a local authority's plan should be half a hectare or smaller**. I do not believe that SDC have fulfilled their obligation in this matter.

In addition to this It is apparent that there are 1000's of empty properties in the district which could be freed up for residents. **SDC do not require this development to meet their housing requirements?**

Transport – as recognised in the developers report this development and those in Cam are located too far from employment areas such as Bristol, Gloucester and Stroud for residents to walk or cycle to work. Road networks are running at close to full capacity particularly at the A38/M5 junctions and this is noted in the Highways and Transport Technical Overview commissioned by ECT and GCC.

The addition of potentially 4000 extra people commuting each day is going to cause major transport problems particularly when considering other developments along the A38 (Sharpness/Berkeley, Hardwick, Falfield & Thornbury plus others in South Glos). The idea that the train travel will help is a fallacy as the rail network is already under strain and as SDC's own survey reports only 1% of residents use this mode of transport. Even if rail usage was to double it would have very little impact on road usage.

Sustainability Appraisal Scoping Report for the Stroud District Local Plan Review (LUC April 2018) notes the following with regards to transport issues.

2.54 The NPPF encourages local planning authorities to promote land uses, transport infrastructure and technologies that reduce the need to travel, greenhouse gas emissions and congestion. Developments that will generate significant movement are required to be located where travel can be minimised, and the use of sustainable transport modes maximised.

Infrastructure – the proposed developments at Slimbridge Parish and Cam will make huge demands on the infrastructure in the local area. The additional 7500

inhabitants will put huge strain on, Schools, Doctors, Dentists, Leisure Facilities (indoor) and others. Whilst a new junior school is in the plan there is no mention of provision for the other services and whilst it may be simple to say that this will follow to meet demand in practice this rarely happens particularly in a development of this size. Access to the services in Cam and Dursley are only really possible via car because of poor pedestrian/cycle provision on the A4135 which will result in a further increase in traffic.

SDC's Sustainability Appraisal report has a number of objectives:

SA 2.1: Does the Plan improve access to doctors' surgeries and health care facilities?

SA 2.2: Does the Plan encourage healthy lifestyles and provide opportunities for sport and recreation, including through the provision of green infrastructure and public open space?

SA 6.2: Does the Plan promote the provision of new and the protection of existing services and facilities at sustainable locations?

SA 10.2: Does the Plan promote more sustainable transport patterns and reduce the need to travel, particularly in areas of high congestion, including public transport, walking and cycling?

Employment – SDC states that its aims are to have a minimum ratio of 1 job for every 2 workers in any settlement. In addition to this Core Policy DCP1 discourages the use of private car and seeks to minimise the need to travel. Dursley, Cam and the surrounding area are already dormitory settlements and with little in the way of employment planned for the area it is inevitable that the use of private car usage will rise.

The Sustainability Appraisal of Stroud District Council's Local Plan Review 2019 States: -

SA 16: To deliver, maintain and enhance sustainable and diverse employment opportunities, to meet both current and future needs.

And possess the questions: -

SA 16.2: Does the Plan provide for accessible employment opportunities?

SA 16.3: Does the Plan support the prosperity and diversification of the District's rural economy?

The plan fails to address these questions.

Heritage – NPPF 185 states, "*Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:*

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation";*

Slimbridge Parish has many areas of historic value with sites dating back to Roman times. We believe that the proposed site at has great historic value and a full survey and report will need to be undertaken in this area before any work can commence.

Alternative sites – I strongly oppose SDC's proposal to build the majority of their housing commitments in the Berkeley Vale creating two large dormitory settlements. A fairer allocation should be sought through dispersal across the whole of the District as was the original request from residents' feedback. This will have the effect of spreading the load across the District making it more manageable and therefore creating less impact. If larger sites are required to meet any shortfall these should be sought closer to employment in areas such as Hardwicke, Stonehouse and Whaddon.

If SDC feels it can support a development, in Tier 3b and 4 settlements ignoring the consequences of such a site then they have a duty to reconsider the overall plan and to now include for consideration land adjacent to all Lower Tier Settlements

In conclusion, I believe that SDC ignored many of its own policy's, recommendations and requirements in proposing a large development in Slimbridge Parish. I do not believe that due diligence has been followed and that this development is being supported as it's a quick and easy fix to a tricky problem. The fact is that there is sufficient housing in the current plan without including the development within Slimbridge Parish and therefore is should be removed from the plan.