

MATTER 5: NEW SETTLEMENTS AT SHARPNESS AND WISLOE

1. This Hearing Statement has been prepared on behalf of Slimbridge Parish Council (SPC), who have submitted extensive representations in relation to the proposed Wisloe new settlement (hereafter referred to as “PS37”).

Q.21) Does the proposed allocation meet the vision, spatial strategy and strategic objectives set out in the Plan? Does the policy ensure that these objectives will be met?

2. PS37 is completely at odds with the overarching District-wide vision to 2040. Front and centre of the Vision is the objective of becoming carbon neutral by 2030, whilst commitments are made to supporting a network of market towns, maintaining a strong sense of identity and local distinctiveness and nurturing high-quality landscapes, green spaces and flourishing wildlife.
3. Whilst the Vision notably lacks reference to PS37, it is clear within Policy PS37 that this new village is not only expected to help the District become carbon neutral by 2030 but it should serve as an ‘exemplar’ development of how this objective should be achieved.
4. SPC consider there will be very few homes, if any, delivered by 2030, particularly given the number of infrastructure related issues to address and the ongoing lack of developer involvement. The 2030 target seems far too soon to expect PS37 to be a beacon of excellence in emerging zero-carbon communities.
5. But even if this District wide target date was adjusted for PS37’s benefit, SPC strongly believe that the site’s size, location and constraints will mean that it is simply not compatible with the carbon neutral objective. In paragraph 3.104 of SPC’s representations [CD5d 953] an assessment is provided of the extent to which PS37 can achieve the emerging requirements of draft Policy DCP1 (*Delivering carbon neutral by 2030*) and it is apparent that it will fail to comply. An ‘exemplar’ development should be capable of clearly meeting all policy requirements.
6. Furthermore, the Promoters’ Masterplan Report [CD5d 955] offers little more than a number of high-level approaches to minimise carbon emissions and opportunities for sustainable living. There are numerous references to the need for ‘**further investigation into the potential for...**’, but there is no strategy to demonstrate PS37 is capable of becoming an ‘exemplar’ carbon neutral development.

7. Furthermore, SPC also fail to see how PS37 will support the network of market towns and maintain a strong sense of identity and local distinctiveness. See responses to Q.28c below and SPC's Matter 2 Statement.

Q22) Does the evidence adequately demonstrate that the proposal will accord with the sustainable ethos of garden communities? Is the site of sufficient scale for the delivery of the garden city principles to be feasible? Has this been robustly demonstrated and is the development, as envisaged in the Plan, likely to be achieved during the plan period?

8. SPC questions how PS37 (a future Tier 3a settlement) could provide the footfall to meet the garden city principle of providing '**strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods**'. The Promoters' Masterplan Report [CD5d 955] notes on page 7 that '**key to the masterplan are two new walkable neighbourhoods with mixed use centres within the northern and southern areas of the site**'. On closer scrutiny, however, it is apparent that the intention is to have a village centre in the northern neighbourhood with a mix of uses that includes a 'potential' farm shop, whilst the 'secondary neighbourhood' to the south has residential focus with no clearly defined centre.
9. The two neighbourhoods do not represent good place-making that accords with garden city principles but instead are an outcome of a constrained and complex site, fragmented by areas of separation and the busy A4135, which creates a significant physical and visual barrier, especially as it is partly on an embankment. Movement between the two neighbourhoods is limited to where the primary street crosses the busy A4135.
10. The inevitable outcome is that the neighbourhoods will effectively function as separate communities with little movement between, particularly from north-to-south given the absence of facilities in the southern neighbourhood.
11. The lack of connectivity is also likely to compromise the viability of the 'potential' farm shop. Residents will be reliant on travel offsite to services in higher order settlements beyond reasonable walking distance. Furthermore, as noted below, there is significant uncertainty regarding the delivery of sustainable transport infrastructure including the active transport links and motorway bridge (which if delivered will only benefit the northern neighbourhood). Even if the links do come forward in the future, the connectivity issues highlighted will mean car travel will have already become engrained in the habits of residents.
12. Further consideration to the compatibility of PS37 with garden city principles is given in paragraph 3.102 of SPC's representations [CD5d 953].

Q23) Will the proposed new settlement be suitably connected to sustainable transport infrastructure networks to ensure that future residents are able to access an essential range of services, facilities and employment opportunities?

13. The Council has provided no evidence to confirm that suitable connections to sustainable transport networks can or will be delivered. The Sustainable Transport Strategy [EB60a] and its Addendum [EB108] identify a series of 'potential' transport interventions that 'could' be provided but these appear to be more aspirations than certainties.
14. Full details of SPC's concerns are provided in its Matter 11 statement. However, in summary, there is concern that the pedestrian / cycle link to Cam and Dursley Railway Station may not be deliverable; that increases in the frequency of rail services may not be deliverable; that there are significant difficulties in introducing appropriate infrastructure to create the envisaged 'sustainable corridor' along the A4135; and that the significant ongoing difficulties of reduced patronage and driver shortages within the bus industry may prevent delivery of the potential bus service enhancements.
15. The Council assumes that all will be delivered but cannot guarantee this will be the case.

Q24) In relation to infrastructure:

a. Will infrastructure to support the allocations be delivered at the right time and in the right place?

16. It may be possible to include appropriate triggers for the delivery of site-specific transport infrastructure within any subsequent planning permission and S106 Agreement. However, this is not possible for the larger items of off-site infrastructure improvements that are identified as necessary within the Traffic Forecasting Report [EB61], such as at M5 Junctions 12 and 14. The timescales for delivery of these major infrastructure upgrades may not be compatible with the Promoter's timeline for planning and construction meaning there is a risk that development could come before the transport infrastructure necessary to deliver it.
17. Paragraph 6.3 of the Transport Funding and Delivery Plan [EB109] states '**Due to the strategic nature of the mitigation required, there remains a level of uncertainty around the funding mechanisms and timing.**' Paragraph 6.5 then continues '**It has also not been possible or appropriate at this stage to determine trigger points for infrastructure, due to the uncertainty on the timing of external growth, and thus it has not been appropriate to consider producing intermediary year traffic models, other than the end date year of 2040.**'

18. The Council's supporting documents are vague in respect to the timing of delivery of the extensive highway mitigation package necessary to support the Local Plan. As such, there can be no guarantee that the mitigation required to justify PS37 can or will be delivered at the right time and in the right place.
- b. Are the proposed rail link to the north and the express coach service to the south viable and deliverable? Have funding sources been identified? Will they be delivered on time to support the new settlement? Have discussions taken place with the relevant infrastructure providers and do they support the projects?**
19. The proposed rail link to the north is associated with PS36 but may result in additional services through Cam and Dursley Station to the potential benefit of PS37. Section 2.1.3 of the August 2022 Infrastructure Delivery Plan Addendum **[EB11a]** indicates that reopening the Sharpness line to passengers would be difficult to achieve. Network Rail has identified that there are important omissions from the Promotor's Rail Study and that additional infrastructure would be required to accommodate both passenger and freight services together with enhancements at Gloucester Station to cater for the envisaged 30-minute frequency of service. Network Rail envisage a cost well into the tens of millions of pounds which clearly would have significant implications on the viability of its delivery.
20. There is no guarantee that the proposed rail link will be deliverable on time to suit the new development, or indeed at all.
21. The express coach service to the south forms part of the Council's proposal for the A38 becoming a sustainable transport corridor. The cost is intended to be secured through the individual allocations that would benefit from it, meaning that what gets delivered when is a function of when planning permissions are granted and the associated financial triggers within. Delivery could therefore be delayed until such time that sufficient contributions have been accrued from the various developments to enable its introduction. This in turn would result in adverse implications on the accessibility of those sites that come forward first.
22. Stagecoach West are generally supportive of the proposed sustainable corridor approach **[SLP-01a]**. However, there is no mention of funding for the new services or the timing of their delivery so again no certainty that they will be delivered at the right time and in the right place.
- c. Has the impact of the new settlement on the surrounding road network, including nearby motorway junctions, been adequately assessed? Can any impacts be mitigated and if so, how? Is the policy sufficiently positively worded in this regard, for example with reference to M5 junction 14.**
23. The Traffic Forecasting Report **[EB61]** and its Addendum **[EB98]** identify the highway mitigation measures required to offset all proposed allocations within the Council's draft Plan. It does not consider the impacts on an allocation-by-allocation basis. The Transport Funding

and Delivery Plan **[EB109]** then seeks to distribute the overall cost of the wider highway mitigation package to the individual allocations pro-rata based on the number of vehicle trips likely to pass through each junction.

- 24.** SPC's Matter 11 Statement raises doubts regarding the accuracy of the underlying modal shift assumptions used within the Traffic Forecasting Report which, if appropriately addressed, could lead to the need for additional highway mitigation. Doubt must therefore be raised on the adequacy of the Council's assessments of impact and the resulting mitigation package, including at the Motorway junctions.
- 25.** Policy PS37 makes no direct mention of off-site highway improvements. It is clear from the Traffic Forecasting Report Addendum that considerable highway mitigation will be required for PS37, despite any sustainable transport measures that may be possible, and this should be recognised in the wording of the Policy.

Q25) Is the site boundary as shown on the proposals map accurate and is it justified?

- 26.** See Figure 1 in Appendix 1 attached which is from the MBELC Site Appraisal (Appendix 1 to SPC's representations **[CD5d 953]**). Figure 1 highlights a number of discrepancies between the site boundary shown on the proposals map and the site boundary shown in the Promoters' Masterplan Report **[CD5d 955]**. In particular, the proposals map includes land south of Cambridge and land east of the A38 (Slimbridge) roundabout which is not owned by the Promoters (identified on Figure 1 as 'GCC and ECT Site').
- 27.** The proposals map boundary is not justified in landscape terms, as the Council's evidence base has not considered the implications in terms of harm to local settlement pattern. The MBELC Site Appraisal finds that PS37 is constrained by a number of factors. Of greatest importance in landscape character terms is the impact on the local settlement pattern, both the sense of separation between settlements in Slimbridge Parish, and their separation with Cam. Neither of the Council's landscape sensitivity studies **[EB36¹]** considered growth as a potential option on land within PS37. The only study to have reached a conclusion with regard to the landscape sensitivity of land to a new settlement at Slimbridge (including PS37) is The Assessment of Strategic Development Opportunities **[EB17a-h]**. However, that study did not undertake any detailed assessment of the assessment areas. As such, the one criterion which should have been flagged as a significant issue – relating to settlement pattern – was not. Further consideration is provided in response to Q28c below.

¹ EB36 is the Landscape Sensitivity Assessment prepared on behalf of Stroud District Council by White Consultants in 2016. Another sensitivity assessment (Landscape Sensitivity Appraisal prepared on behalf of Stroud District Council by URS in 2013) is available on the SDC website, and was part of the evidence base for the 2015 Local Plan examination (Ref CD/D14).

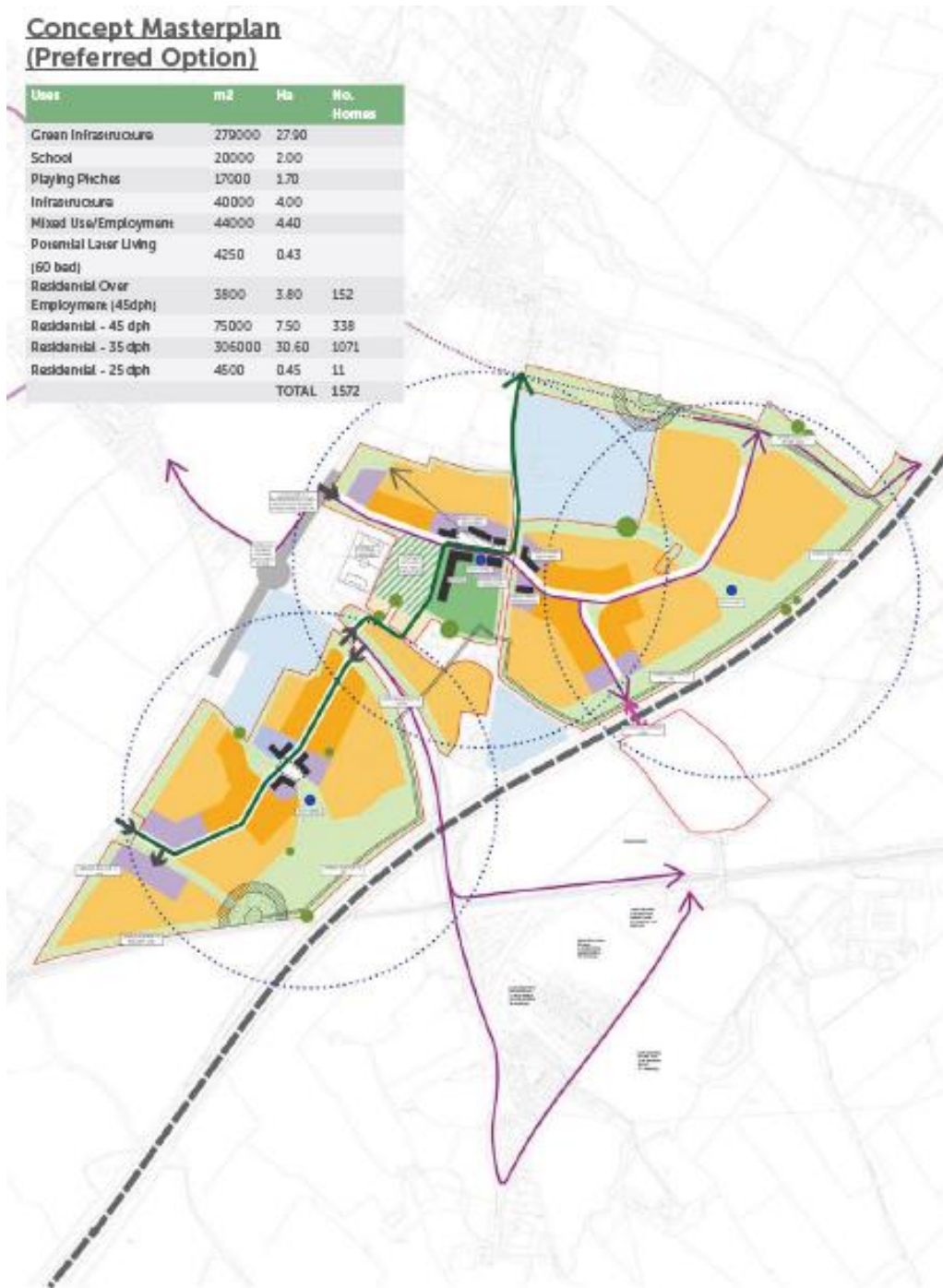
Q26) Are the indicative site areas, appropriate uses, net developable areas, minimum densities and indicative site capacities justified and effective?

28. As noted above, the proposals map boundary includes land beyond the Promoters' ownership and masterplan boundary – see extract 1 below from [CD5d 955].



Extract 1 from page 18 of PS37 Masterplan Report

29. Page 7 of the Promoters' Masterplan Report explains that **'the masterplan demonstrates that the allocation for approximately 1,500 homes and 5 hectares of employments space is achievable on land wholly within The Ernest Cook Trust and Gloucestershire County Council ownership (which accounts for 92% of the land within the allocation). Notwithstanding this, the masterplan has been designed to accommodate the other land parcels within the allocation, allowing for access where this is required, should these come forward at a future date.'**
30. With closer scrutiny, however, it is evident this is not the case. Part 2 Section B of the Masterplan Report presents two options; the first the preferred masterplan option which assumes the gas pipeline can viably be diverted, and the second an alternative option if the gas pipeline has to remain in-situ. The preferred option is identified as having the capacity to deliver 1572 dwellings and the alternative option 1465 dwellings.



Extract 2 from page 17 of PS37 Masterplan Report Part 2



Extract 3 from page 17 of PS37 Masterplan Report Part 2

31. It is notable that on the preferred option the residential areas have spread beyond those indicated on Page 18 of Masterplan Report Part 1 to cover the employment area at the southern end of the site and encroach into the green infrastructure along the western boundary, next to A4135 and along the eastern edge of the northern parcel. This raises serious questions over the illustrative material presented in the Masterplan Report and the extent to which the Promoters can deliver the required quantum of employment land, the

noise bund and 30ha of green and blue infrastructure, which is required for open space, landscaping, SuDS, achieving at least 10% biodiversity net gain etc.

32. The preferred option (extract 2) also includes 'offsite residential areas' in blue which are not reflected in extract 1 above, but notably includes land which falls outside of the proposals map boundary, as shaded in blue on the PS37 Policy Map² below.



Annotated version of PS37 Policy Map

33. Even with the spread of residential parcels identified on the preferred option, calculations undertaken on behalf of SDC reveal that, at the densities identified, this only provides enough land for 1,432 dwellings. As such, to accommodate 1,500 homes, densities across the residential parcels would need to increase (which would be contrary to local character / garden village principles) and/or land outside of the Promoters' control (and potentially outside the site allocation boundary) will be required, causing greater harm to the local settlement pattern.
34. It is also evident from the Promoters' Alternative Option (extract 3 above) how PS37 would be even more fragmented and incoherent if the gas pipeline cannot be moved.

² from page 186 of the draft Local Plan

Q28) In relation to general site layout / masterplanning:

a. Will the site be delivered in accordance with active design policies?

35. No, as noted in response to Q22, the fragmented and constrained landscape severely limits the potential to design a cohesive settlement around active design principles.
36. The railway, M5 and River Cam along the southern, eastern and northern boundaries are also significant barriers to external movement and connectivity. As noted in response to Q23 and SPC's Matter 11 statement there is significant uncertainty over whether the aspirational proposals to provide connectivity across the M5 and railway can be delivered.

b. If key landscape corridors are to be retained and kept free from development, will there be sufficient scope within the site to deliver 1500 dwellings at an appropriate density?

37. See our response to Q26. We also note some of the strategic landscape corridors shown on the PS37 Policy Map have been replaced by developable areas on the Promoters' masterplan. For example, land alongside the unnamed road east of Dursley Road and land north of the railway.

c. How will landscaping and layout address any visual impacts from the site's development?

38. The constraints presented by the location of PS37 and its role in maintaining separate settlement identities cannot be overcome through landscaping or layout. This significantly undermines the suitability of PS37 for large-scale residential development. As well as connecting Slimbridge and Cam, development of PS37 would also result in the connection of Slimbridge, Cambridge, and Gossington along the A38 (see Figures 5, 6, 7 in Appendix 1 attached). PS37 continues virtually all the way along the eastern side of the A38 and is only broken by a small amount of existing development (Wisloe Business Park), and a small area of land which is not being promoted (White House). While open countryside would remain between these settlements west of the A38, users of this road would not experience any meaningful sense of separation, and visual coalescence between the new development in PS37 and existing development would emphasise the lack of any clear gaps between these settlements.
39. There would be visual coalescence from other locations including from the southern edge of Slimbridge e.g., from Footpath 31. From this footpath the narrow gap between existing development in Slimbridge around the A38 roundabout and the southern edge of Cambridge is clearly seen (see Figure 10 in Appendix 1 attached). If development were to occur alongside A38 in PS37 it would sit in this gap, resulting in visual coalescence between

Cambridge and Slimbridge. Development would be seen to stretch virtually unbroken from St John's Road in Slimbridge to the southern edge of Cambridge.

40. The development would result in other visual impacts that would not be mitigated. Including impacts on the character of views of Slimbridge Spire from Dursley Rd and Fp 45, and the loss of views across open fields which currently contribute to local landscape character. For example, views across fields within the southern part of PS37 currently make a positive contribution to the setting and sense of arrival at Gossington after crossing Gossington Bridge. Development within PS37 would replace these fields and be visible immediately opposite the entrance/exit to Gossington. PS37 would then continue along almost all of the eastern side of the A38 between Gossington and Slimbridge.
41. The indicative landscaping and layout shown on page 17 of the Promoters' Masterplan Report **[CD5d 955]**, would not overcome the issue of visual coalescence along the A38 nor the other visual impacts identified in the MBELC Site Appraisal. The green infrastructure corridor along the eastern edge of A38 is approximately 28m wide but would be broken by new vehicle entrances which would enable views into the development. The Promoter's masterplan also indicates that this corridor would accommodate large attenuation ponds/SUDs which would significantly diminish the capacity of the corridor to accommodate mitigation planting.
- Q33) Reference has been made to footpaths across the site that cross the railway. What is Network Rail's view on this issue? Are there any safety implications that the proposed development would need to take account of? Does the policy need to refer to this?**
42. Public Footpaths Slimbridge 46 and Slimbridge 53 both cross the railway line at grade in locations where the maximum line speed is 100mph and there are approximately 108 trains per day.
43. Network Rail's Regulation 19 representation **[CD5b 3]** identified that the draft Plan does not include the need for safety assessments of the crossings or the provision of mitigation. More generally, Network Rail strongly resist increased usage of at grade crossings associated with development and seek mitigation in the form of new pedestrian overbridges or the rerouting of Public Footpaths.
44. The Council anticipate that the crossing points will be closed and the Public Footpaths rerouted, however, no definitive routes have been identified or approved and may not be available. It should also be noted that the closure/diversion of a Public Footpath is reliant on a legal process that itself is subject to public consultation and cannot be guaranteed.

Q34) Are there any barriers to the site coming forward as anticipated by the housing trajectory? Are delivery assumptions realistic?

- 45.** There are numerous barriers to delivery as set out above and in SPC's Matter 11 Statement. The delivery assumptions are not realistic - see SPC's Matter 7a Statement for further consideration.

Appendix 1

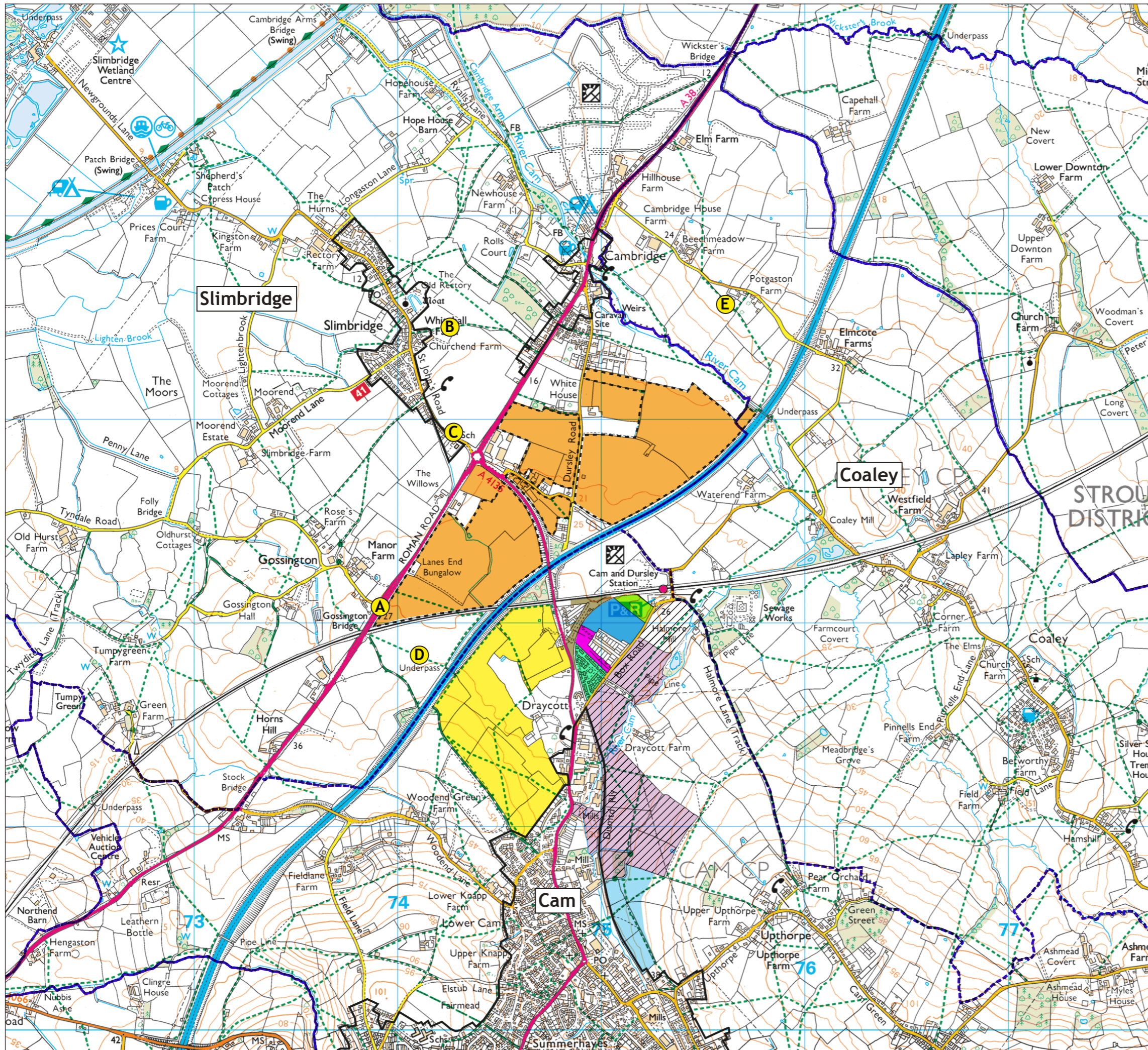


FIGURE 1
PS37 Location & Context



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1167
Draft Allocation PS37 Wisloe, Stroud

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Legend

- Parish Boundaries
- GCC and ECT Site
- Location of photographs A-E (see Figures 9-13)
- Stroud District Local Plan Review (Draft 2019) Proposed Allocations**
- PS37 New Settlement at Wisloe (1,500 dwellings)
- PS24 West of Draycott (700 dwellings)
Scoping request has been submitted to SDC for 1,100 dwellings (LPA Ref: 2020/0314/EIAS)
- PS25 East of River Cam (180 dwellings)
- Adopted Stroud District Local Plan, 2015**
- Settlement Development Limits
- SA3 Northeast Cam (450 dwellings)
- Planning Applications**
- Land South of Railway Line (42 dwellings)
(Awaiting Decision - LPA Ref: S.18/2697/OUT)
- Land North West of Box Road (90 dwellings)
(Approved Feb 2020 - LPA Ref: S.19/0810/REM)
- Land Adjacent to Box Road Avenue (36 dwellings)
(Approved Jan 2020 - LPA Ref: S.19/1519/REM)
- Coaley Junction (41 dwellings)
(Approved March 2019 - LPA Ref: S.18/0044/FUL)
- Land North East Of Draycott (450 dwellings)
(Approved Dec 2017 - LPA Ref: S.15/2804/OUT)
- Land Opposite 6 Box Road (71 dwellings)
(Completed - LPA Ref: S.13/0448/FUL)



0 250 500 1km



FIGURE 5
Current Separation



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Legend

Existing Applications/ Development (Figure 1)

Adopted Stroud District Local Plan, 2015

Settlement Development Limits (SDL)

SA3 Northeast Cam

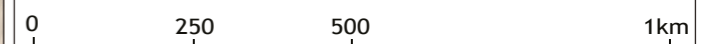
Stroud District Local Plan Review (Draft 2019)

Land proposed to be included in SDL

Separation Distances Along Key Routes

- 1.5 km (Distance along St John's Rd & A4135 between Slimbridge SDL & Cam SDL. Distance is less (960m) between Slimbridge SDL and development north of Cam, which begins immediately after railway).
- 950m (Distance along A38 & St John's Rd between entrance to Gossington & Slimbridge SDL).
- 530m (Distance along St John's Rd & A38 between Slimbridge SDL & Cambridge SDL. Distance is less (470m) between Slimbridge SDL and southernmost dwelling along A38 in Cambridge (Pear Tree Cottage). Distance is less (240m) between buildings in Wisloe Business Park and Pear Tree Cottage).
- 800m (Distance along Dursley / Wisloe Rd between development in Cambridge & development at Wisloe Rd/ Slimbridge).
- 1.7 km (Distance along Fps 46, 45 and Byway 21 between Gossington & Cam. Distance from Gossington Bridge to Cam using Fp 45 and Byway 21 is 1.45 km).

All distances are approximate and measured from Google Earth.



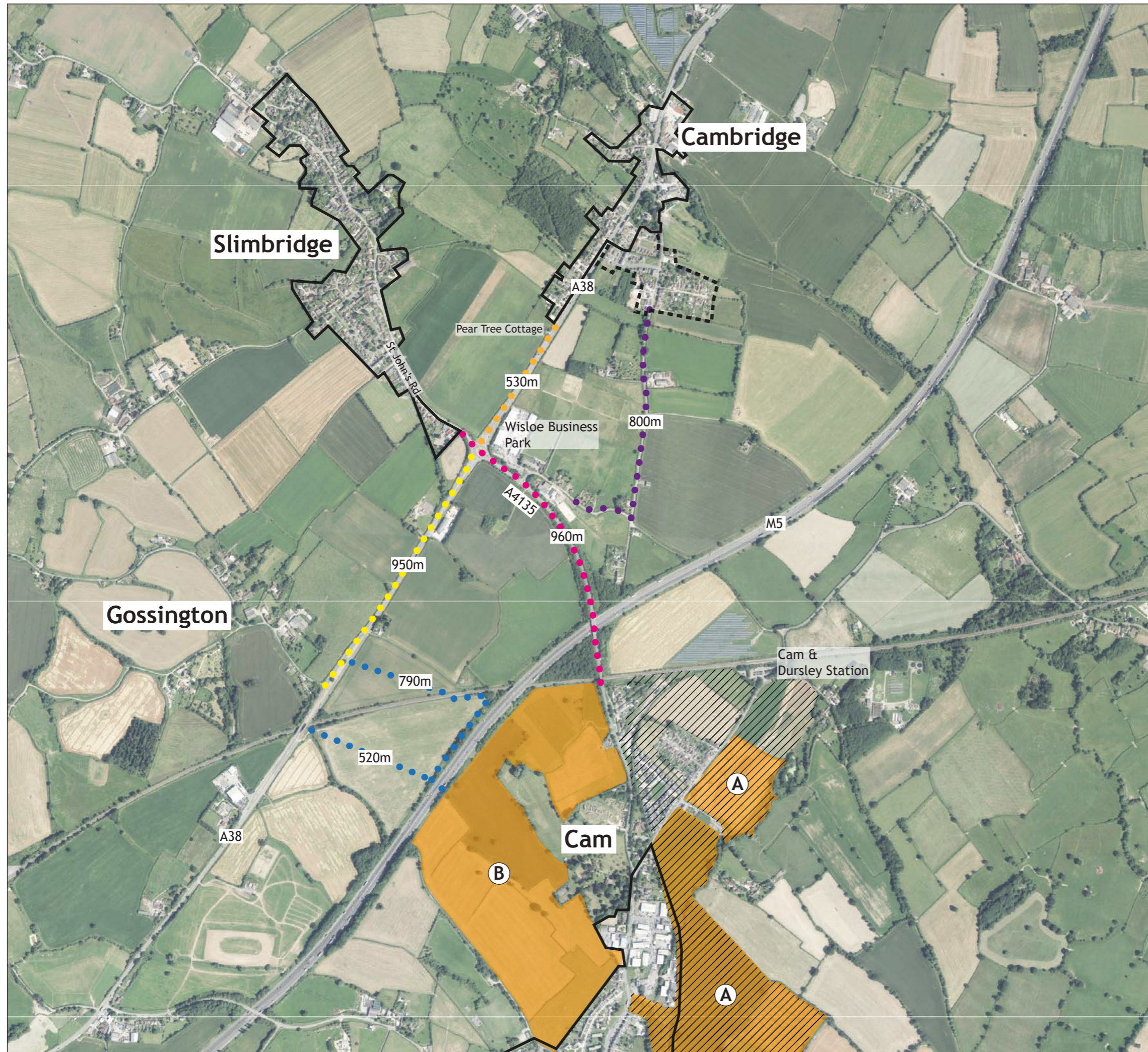


FIGURE 6
 Separation after Proposed
 Allocation: PS24



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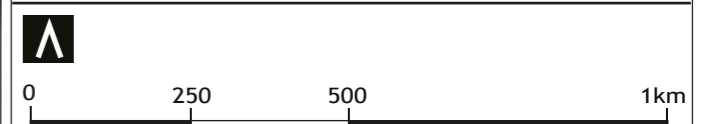
- Existing Applications/ Development (Figure 1)
- Adopted Stroud District Local Plan, 2015**
- Settlement Development Limits (SDL)
- SA3 Northeast Cam
- Stroud District Local Plan Review (Draft 2019)**
- Land proposed to be included in SDL
- Proposed Allocation (Policy PS24) (700 dwellings)

Separation Distances Along Key Routes

- 960m (Distance along St John's Rd & A4135 between Slimbridge SDL & PS24 / Cam)
- 950m (Distance along A38 & St John's Rd between entrance to Gossington & Slimbridge SDL).
- 530m (Distance along St John's Rd & A38 between Slimbridge SDL & Cambridge SDL. Distance is less (470m) between Slimbridge SDL and southernmost dwelling along A38 in Cambridge (Pear Tree Cottage). Distance is less (240m) between buildings in Wisloe Business Park and Pear Tree Cottage).
- 800m (Distance along Dursley / Wisloe Rd between development in Cambridge and development at Wisloe Rd/ Slimbridge)
- 790 m (Distance along Fps 46, 45 and Byway 21 between Gossington & PS24 / Cam. Distance from Gossington Bridge to PS24 / Cam using Fp 45 and Byway 21 is 520 m)

Observation Summary: PS24 would consolidate development at the northern edge of Cam, extending the main body of Cam closer to Gossington, Slimbridge and Cambridge but separation between Gossington/Slimbridge/Cambridge would not change.

All distances are approximate and measured from Google Earth.



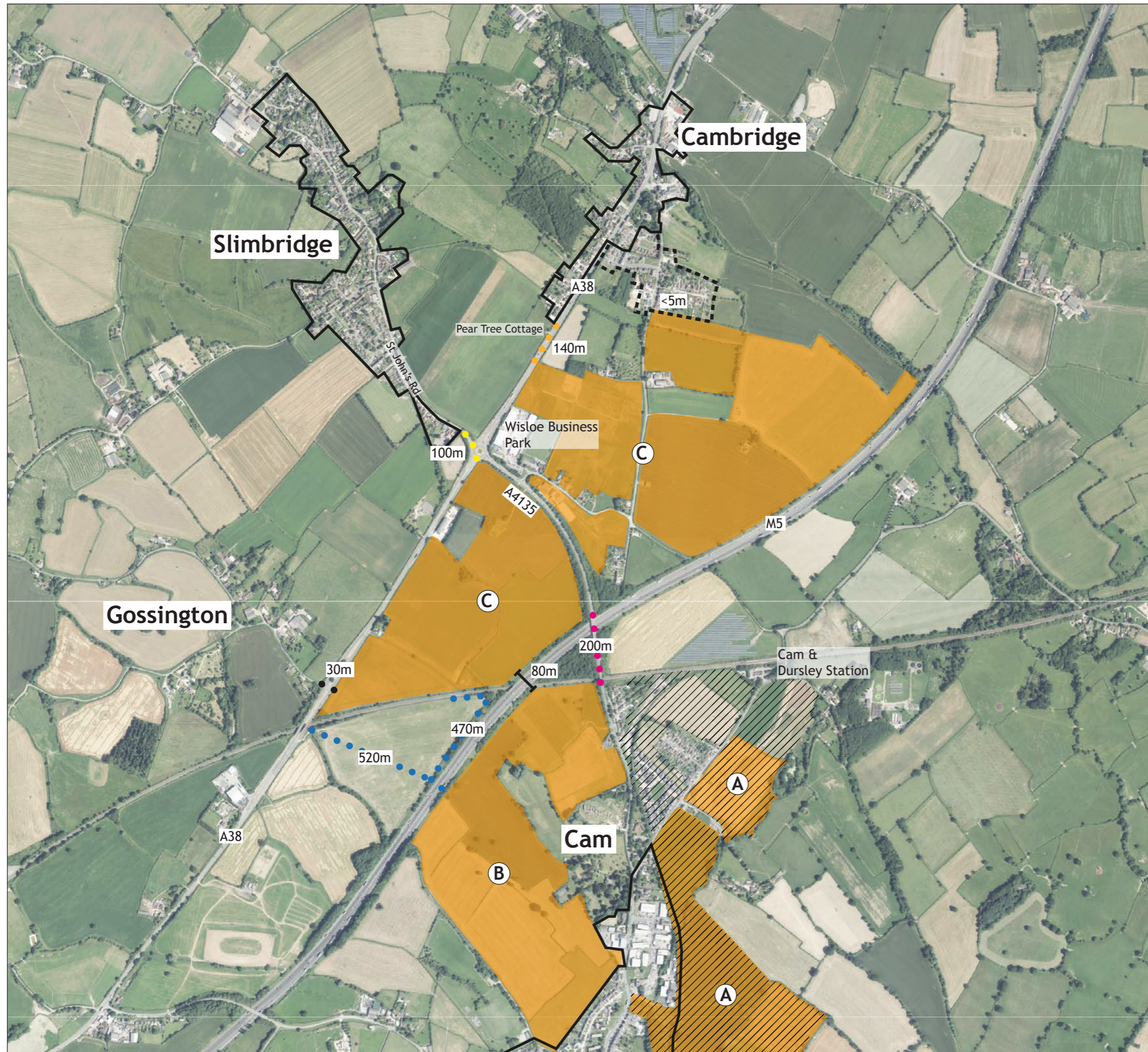


FIGURE 7
 Separation after Proposed
 Allocations: PS24 & PS37



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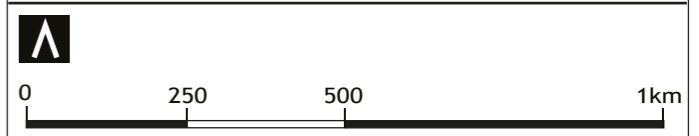
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- Existing Applications/ Development (Figure 1)
- Adopted Stroud District Local Plan, 2015**
- Settlement Development Limits (SDL)
- SA3 Northeast Cam
- Stroud District Local Plan Review (Draft 2019)**
- Land proposed to be included in SDL
- Proposed Allocation (Policy PS24) (700 dwellings)
- Proposed Allocation (Policy PS37) (1,500 dwellings)

- Separation Distances Along Key Routes**
- 200m (M5 and railway bridges) (Distance along A4135 between PS37 & PS24 / Cam).
 - 100m (Distance along St John's Rd & the A38 roundabout between PS37 & Slimbridge SDL).
 - 140m (Distance along A38 between PS37 & Cambridge SDL. Distance is less (80m) between PS37 and southernmost dwelling along A38 in Cambridge (Pear Tree Cottage).
 - 30m (the width of A38) (Distance between PS37 & entrance to Gossington).
 - 470m (Distance along Fps 46 & 45 between PS37 & PS24 / Cam. Distance from Gossington Bridge to PS24 / Cam using Fp 45 and Byway 21 is 520m).
- No separation would remain along Dursley / Wisloe Rd between development in Cambridge and development at Wisloe Rd/ Slimbridge).

Observation Summary: PS37 would erode the sense of separation along the A38 between the currently separate settlements of Cambridge, Slimbridge and Gossington, and, if implemented alongside PS24, effectively join these settlements with Cam. Only the M5 corridor (80m) would separate development within PS37 from that within PS24.

All distances are approximate and measured from Google Earth.





Photograph B: Looking south east from Fp 31 towards the gap between the Business Park (A38 roundabout) and the southern edge of Cambridge

