

Campaign to Protect Rural England – Gloucestershire Branch Notes on the Stroud District Council Emerging Strategy 2018 by CPRE Stroud District and CPRE Berkeley Vale District

THOUGHTS FROM CPRE STROUD DISTRICT

In the eastern part of the district where valleys and hilltops dominate the landscape and where the AONB covers a large proportion of the land area, there are some anomalies. The emerging Strategy states 'The general consensus is that development should be focused on brownfield/derelict areas and within settlement boundaries.' (page 17) and yet this has not been adhered to in some of the land allocations.

In CPRE's view, the protection of the AONB from large scale development is vitally important. Hilltop sites and those in the AONB should be protected from large land allocations. Smaller sites for 5-10 houses, especially those for local people, are acceptable but in our view the massing of 50-100 houses on greenfield sites outside settlement boundaries is unacceptable.

There are currently three proposed large greenfield sites within or immediately adjacent to the AONB, in Minchinhampton and Nailsworth. These should be removed from consideration as they are protected by national policy from major development. One of the sites is for over 100 houses. In the case of Minchinhampton, this allocation also is at odds with the protection of local green spaces (page 20) given the SSSI status of a large part of the parish.

We support the provision of sites for small groups of affordable houses, on rural exception sites or within settlement boundaries within the AONB where there is a locally-perceived need.

Housing for the retired should also be given consideration in all communities so that older people are able to remain within their local area, close to family and friends.

We are pleased to see the inclusion of development of brownfield land in the plan, especially the encouragement for Brimscombe and Thrupp canal sites and the canal redevelopment generally in the district.

NOTES FROM CPRE BERKELEY VALE DISTRICT

Stonehouse Site PS19a 500 dwellings + 5ha employment and PS 19b 150 dwellings – The development of these sites in conjunction with the existing SA2 make a safe crossing of the railway lines essential so children can walk/cycle to secondary school and the town centre. The level crossing at Oldends Lane is not secure enough.

Will consideration be given for provision of safe off-road cycling tracks and wide pavements through these developments to encourage cycling/walking to school and work and reduce air pollution?

Will there be enough safe open spaces for the young to let off steam?

What provision is there for increased secondary education capacity in the town?

This development needs to be rather better than its neighbour 'West of Stonehouse' in design, layout and build quality.

Stonehouse Sites PS20a and 20b – 10ha employment in PS20a – What about provision for a quiet zone around William Morris House?

Provision for safe cycle routes to Stonehouse will be needed.

It is a pity to spoil this stretch of open country, clearly visible from the motorway and the AONB, with development.

Focus School, Wanswell, Berkeley – PS35 70 houses on school playing field. We should not be building on school playing fields, and if the Focus School does not want to use the land for what it was intended, it should be made available for the village to use for sports.

Serious consideration must be given to the protection of the River Severn, particularly given the scale of the proposals for Sharpness. It would be appropriate to protect the river banks from development by means of a specific policy.

The relevant policy from the draft Tewkesbury Borough Plan states in full:

Policy LAN2 Landscape Protection Zone

Within the Landscape Protection Zone, as identified on the Policies Map, special protection is given to the ecology and visual amenity of the river environment. In considering proposals for new development within the Landscape Protection Zone regard will be had to the following, as appropriate:

- *The visual and ecological effect of the new development on the river banks or the associated landscape setting of the Severn Vale;*
- *The impact of the development on the water environment;*
- *Whether the proposal would enable the protection of important landscape and environmental features within the designated area;*
- *Whether reasonable opportunities for the enhancement of the environment and landscape are sought, including appropriate provision for improved public access*

Where a proposal would result in harm to the Landscape Protection Zone having regard to the above criteria, this harm should be weighed against the need for, and benefits from, the proposed development. Proposals causing harm to the Landscape Protection Zone will only be permitted where the benefits from the development would clearly and demonstrably outweigh the identified harm.

The extent of the LPZ is shown on the Proposals Map for the previous Tewkesbury Borough Local Plan and is unchanged. It is quite broad. CPRE would welcome a similar policy within the Stroud District Council area to define a suitable zone possibly covering the entire area between the river bank and canal north of Sharpness, and an equivalent area to the south.

CPRE recommends that SDC adopt this policy with minimum amendments to reflect local circumstances and at the same time ensure consistency of treatment for the Severn in Gloucestershire.

Sharpness – south west area of PS36. There is serious lack of specificity of these proposals at Sharpness. Although the red lines are carefully defined by reference to roads, field boundaries and other features, the shading suggests that these are areas of search rather than allocations. The areas of land involved at Sharpness are very large but there is no indication of how many hectares would be developed, which would enable us to take a view of whether or not there is sufficient land to accommodate the 2,400 dwellings proposed. There is probably more than enough – however Stroud District Council should provide this information for a judgment to be made together with evidence to show that these proposals are deliverable. If they are not, it would mean allocating potentially significant numbers of dwellings elsewhere in the District in order to meet requirements in a situation where the extent of strategic choice is not great.

We are very concerned about development in the area outlined in red between the Severn and B4066. It is in Flood Zone 2. The Severn Way goes through it. It is a very good area for wildlife (it should be properly surveyed before any further plans are made). If the land becomes a public amenity space close to a large housing development everybody's dogs will put an end to the wildlife. It should also be remembered that with climate change the risk of storm surges up the Severn will increase in size and intensity. At this point of the River Severn the fast flowing deep channel comes close to the bank on this side before swinging across to the Forest of Dean side after the entrance to Sharpness docks. It would be better to restrict the proposed development area to land to the east of the B4066.

This area is going to need a lot of provision for local employment and better road links with the A38. The old railway line could be developed into a cycle track, or the railway line rejoined to Berkeley Road. The motorway access at junction 14 will need upgrading to manage the increase in traffic.

Design and layout should be of high standard and materials should reflect the local genre and be of sympathetic colour.

Wisloe PS37 1,500 dwellings by 2040 + 5ha employment land. This development between Slimbridge and Lower Cam is understandable, but regrettable. Every effort must be made to design the layout so that it is spacious and connects to existing housing and the old Dursley road which runs through it, so that it evolves as a sympathetic development of Cambridge with its own playing fields, green spaces and community centres. It should have pedestrian/cycle access to Cam and Dursley station via a bridge over the motorway. It should also have adequate parking allocated to each dwelling. It needs to do rather better than 'West of Stonehouse' in design, layout and build quality.

Kingswood – P38 or P39. Kingswood has had more than its fair share of development and Gladman is already homing in on KIN007 where as the two proposed development sites are associated with better drained land and a wider road. Care must be taken to preserve the identity of the village.

Dursley, Ganzells Lane PS29 – 80 dwellings. A planning application for this site was previously refused at appeal due to impact on the AONB which surrounds it on three sides. This is not a suitable location for development: it is on the wrong side of Dursley; the access would be through an existing housing estate or Ganzells Lane which is little more than a cart track – neither have the capacity for another 320 car movements a day, and if access were changed to the B4066 the additional traffic would have to go through the town centre to reach the A38, station or motorway, or through Uley. Neither of these directions have the capacity. Dursley Town centre has very poor traffic flow at peak times. Since Dursley is predominantly a dormitory town there should be no development on the Uley side of Dursley as all the main communication routes to the A38, M5 and railway station are to the west.

Gloucester Fringe – Hardwicke and Whaddon Whaddon – G2

Any development at Whaddon should be regarded as an extension to Gloucester to meet the City's needs. Needs arise from settlements, not administrative areas, and it would be wrong to suggest that Whaddon should be regarded as meeting the needs of Stroud District. Any development in this area should be integrated with the City and not aligned with Brookthorpe, which has a distinct identity as a village, in contrast to the smaller and much less coherent collection of buildings which make up Whaddon.

All this presupposes that Whaddon is an appropriate location for major development. Needs arising from the City should be met in the following order (1) within the City's boundaries (2) elsewhere in the JCS area (3) at Hardwicke, which is better served by public transport and has a better relationship with employment areas.

However, if Stroud District Council is compelled to include development at Whaddon in order to meet its housing target, not Gloucester's, it should be developed in a well spaced rural village genre, sympathetic to Brookthorpe and both should remain separate and distinct from Gloucester. Whaddon is currently countryside and adds to the setting of the AONB.

Hardwicke – G1 site between the canal and Hardwicke village should not be allocated to meet Gloucester's housing needs if it is needed to contribute to meeting needs within Stroud District.

When planning new settlements and other developments consideration should be given to grouping housing for the elderly near community facilities so that they are not isolated. There should also be generous provision of Green Infrastructure and recreation space and a conscious effort to ensure that new development is distinctive and provides a sense of place rather than all looking the same.

Berkeley Vale District
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