

MATTER 2: SPATIAL STRATEGY AND SITE SELECTION METHODOLOGY

1. This Written 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.4) Is the spatial strategy justified by robust evidence and does it promote a sustainable pattern of development within the District, in accordance with paragraph 11 of the Framework? Is the Council decision as to why this development distribution option was selected, sufficiently clear?

2. The spatial strategy seeks to unduly focus development upon new settlements, rather than sustainably distributing growth within the District.
3. Stroud District Council (SDC) has failed to have regard to the extensive range of available evidence that demonstrates how and why it would result in a completely unsustainable pattern of development.
4. The scale of growth to the north of Cam, is not adequately reflected by the plan on page 182 of the Draft Local Plan (DLP), which is misleading as it omits developments approved on unallocated sites and the approved extent of the Millfield’s urban extension. Nor does it reflect the proposed southerly extension to the SDL for Cambridge, which would join the site allocation boundary for PS37 with this existing village. SPC consider that this has important implications in terms of coalescence and harm to the existing settlement pattern of Slimbridge Parish.
5. SPC’s representations **[CD5d 953]** highlight the findings MBELC’s Site Appraisal (Appendix 1 to the representations) which identifies the main landscape related constraints to the development of PS37. Of greatest importance in landscape character terms is the impact that the development would have on the local settlement pattern, both the sense of separation between settlements in Slimbridge Parish, and their separation with Cam.
6. The report demonstrated how PS37, combined with the allocation of “Cam Northwest” (Policy PS24), would result in a continuous band of settlement stretching from Dursley in the southeast and Slimbridge in the northwest. As well as connecting Slimbridge and Cam, the new settlement would also result in the connection of Slimbridge, Cambridge and Gossington along the A38 and Dursley Road. There would be no meaningful gap, and the settlements

would run into each other forming a continuous urban area. This would result in the loss of a distinctive and valued characteristic of Slimbridge Parish as recognised in published landscape character assessments. Furthermore, development in the assessment area would have a poor relationship with the existing settlement form/pattern.

7. The MBELC report went on to conclude that the constraint presented by the location of PS37 and its role in maintaining separate settlement identities cannot be overcome through design or expensive infrastructure and this significantly undermines the suitability of PS37 for large scale residential development.
8. SPC believes that the identification and assessment of the PS37 site was flawed as it was assessed as a number of different component sites. SL1002, SL1004 and SL1005 were considered in the 2018 SALA and sites SL1006 and SL1007 in the 2019 SALA¹.
9. The initial SALA assessments recognised that coalescence was an issue, and acknowledged that piecemeal development in this area would erode the countryside gap between Slimbridge, Cambridge and Cam. Despite this, SDC went on to seemingly ignore this matter when the sites were subsequently all combined into site PS37.
10. SPC does not consider that SDC has produced any robust evidence to demonstrate that the amalgamation of these smaller sites will result in the creation of a sustainable new settlement.
11. Furthermore, the SALA assessment should have recognised the major impediments that adversely impact site PS37 (e.g., high-pressure gas pipeline, Best and Most Versatile Grade 2 agricultural land, safeguarded minerals, flood risk, coalescence, noise, air quality, transport impediments etc), but it has not seemingly given any significant weight to these.
12. Consequently, it is evident from the above, that in relation to PS37, SDC's spatial strategy is at deviance with the available evidence. SPC have highlighted significant inadequacies in the SA scoring regarding housing and transport matters². PS37 is also, therefore, considered to be contrary to paragraph 11 of the NPPF as it will not result in a sustainable pattern of development.

Q5) Is the reliance on the delivery of most of the growth on a relatively small number of strategic development sites, including two new settlements, justified? How were the locations for the two new settlements at Sharpness and Wisloe identified and was the process robust?

¹ See Section 2 of SPC's Regulation 19 representations

² See paragraphs 20 and 36 in this Statement

13. Even if a need were to be established for accommodating the 1,500 dwellings proposed for delivery at PS37, there are alternative choices available that would provide more sustainable development options that would be both easier to deliver and cause less environmental harm.
14. Reliance on such a small number of very large development sites, risks causing delays in the housing pipeline given that such sites are usually significantly slower to deliver than small and medium sized sites, which have far less up-front infrastructure.
15. It is considered noteworthy that in 2018, SDC submitted a failed bid for PS37 to join the Government's Garden Communities programme, which was rejected with a score of only 12 out of 35 for 'deliverability and viability' (i.e., 34%). The assessment highlighted that **'Further work was required on major infrastructure issues, in particular: M5 corridor and J13, Cam and Dursley Station and connections to it across the M5.'**
16. The site appears to have been largely rejected on the basis that it was of insufficient size to bear the associated large developer infrastructure costs and did not conform with many of the core planning requirements. Even now, we understand that there is still no lead developer in place to deliver a scheme in accordance with the Promoters' masterplan. Furthermore, the Promoters have significantly under-estimated the required infrastructure cost, to be borne by the site developer, and the implications of the numerous site constraints.
17. The Plan specifies that PS37 will be an exemplar for achieving carbon neutral development by 2030 and will take place in accordance with Garden City Principles. SPC consider that many of the DLP's aspirations in respect of PS37 are unrealistic, unachievable and/or unviable given the need to address key site constraints.
18. SPC does not consider that the site selection process was sufficiently robust. It considers that SDC has pursued an unsustainable strategy of placing housing estates on the A38/M5 corridor from the outset, irrespective of feedback from Draft Local Plan consultations. Despite this, alternative large sites options consulted on later in the process were discounted without accurate regard to key SA factors, including the fact that the average travel to work area distance for PS37 is higher than for Moreton Valence, Hardwicke and Whitminster.
19. Both Whitminster and Morton Valence were possible alternatives to PS37 and are developer led sites supported by technical evidence and informed costings for infrastructure requirements. Thereby eliminating the uncertainty that exists in relation to site PS37.
20. Although these two locations were considered later when SDC determined that the housing requirement figure needed to be significantly increased, they were not adequately assessed.

SPC's consultant Clearlead has identified significant deficiencies in the SA process and errors in the assessment.³

- 21.** SPC note that over half of the total housing supply will be delivered on sites located within the Berkeley Cluster (4,200 dwellings), which will deliver dwellings at Wisloe (1,500), Sharpness Garden Village (2,400) and Sharpness Docks (300). SPC strongly questions whether two new Garden Villages at Wisloe and Sharpness can realistically both be delivered in the LPR period given that they are located only 6.5 km apart. Furthermore, an additional 1,080 dwellings are also located nearby at the strategic allocations at Cam North-West and Cam North-East Extension.
- 22.** Given its site constraints and associated development costs, the actual deliverability of the PS37 allocation is considered to pose a huge question mark upon the soundness of the DLP and should be deleted.

Q6) Is the strategy consistent with the settlement hierarchy and is the scale of development proposed at relevant settlements justified?

- 23.** Core Policy CP3: Settlement Hierarchy identifies a tiered system of settlements in respect of the level of development appropriate at individual settlements. The following rankings are most relevant in terms of proximity to Wisloe:
- Tier 1 (Main Settlements) = Cam
 - Tier 3b (Settlement With Local Facilities) = Slimbridge
 - Tier 4a (Accessible Settlements With Basic Facilities) = Cambridge.
- 24.** SPC considers that the fact that PS37, once developed, will only be classified as a Tier 3a settlement demonstrates that even if the new settlement were to be delivered as envisaged, it would not be capable of delivering a range of facilities and services that would enable it to be truly sustainable. Instead, it could only reasonably support a limited range of local facilities, which would mean that future occupants would be heavily reliant upon private car journeys to meet the majority of their retail and leisure needs. Thus, putting additional pressure on the nearby A38 and M5 road corridors.
- 25.** PS37 will coalesce with the adjoining tier 3b and 4a settlements of Slimbridge and Cambridge respectively. As noted above, SPC considers that the three villages are effectively being enlarged and joined into an unsustainable agglomeration.

³ (see Appendix 21 of SPC's representations and its Matter 1 Hearing Statement).

Q7) Has it been clearly demonstrated how the SA, HRA, infrastructure, viability and other relevant evidence have influenced the location of development and the overall strategy during plan-making?

26. SPC strongly believes there to be a distinct lack of evidence to demonstrate why PS37 is considered suitable for allocation as a location for a new settlement. Indeed, it believes that there is significant evidence available to the contrary, which demonstrates why PS37 would be an inappropriate and unsuitable location.
27. For instance, it has highlighted the existence of documented evidence of protected species using the site, including Eurasian Curlews, which are identified as interest feature 7 of the Severn Estuary Special Protection Area (SPA) as part of the internationally important assemblage of waterfowl, meaning that the open agricultural land of the proposed allocation and the surrounding area are both important for curlew and provide supporting habitat for the Severn Estuary SPA. There would therefore be a loss of habitat that is currently serving a supporting role for a European site. On this basis, PS37 should be identified and assessed as functionally linked land to the SPA within the HRA of the Draft Local Plan. This is not addressed within the HRA Report (May 2021) [EB85]⁴.

Q8) Does the spatial strategy make effective use of previously developed land and is this based on a robust and up-to-date evidence base?

28. Insufficient regard has been given to the content of paragraph 119 of the NPPF, which stipulates that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land. SDC's strategy is placing considerably greater reliance on greenfield provision than is currently the case in terms of its Adopted Local Plan.
29. Tables 4A-D (Actual and Potential Loss of B-Use Employment Land) [CD1] identifies that significant amounts of brownfield housing provision have been, and are likely to continue to come forward from current and former employment sites. In December 2022, the Stroud Brownfield Register was published. We have calculated that this identifies site capacity for a net total of between 1,651 and 1,863 dwellings.
30. SPC believes that inadequate consideration has been given to the reuse of brownfield sites. SDC needs to focus upon realising its extensive brownfield land opportunities before proposing a new settlement located on Best and Most Versatile agricultural land, which would

⁴ See also SPC's Matter 1 Hearing Statement in relation to the SA and Matter 5 in relation to infrastructure costs and viability.

be lost forever. Consequently, the strategy fails to give sufficient weight to the need to steer development away from unsustainable locations that will be harmful in terms of climate change, and to the importance of retaining agricultural land for food security purposes. SPC's spatial strategy is also counter-productive to its Carbon Neutral 2030 Strategy given its focus upon greenfield development ahead of brownfield development.

31. The fact that the strategy only makes provision for a very low percentage of brownfield development, despite the development opportunities open to it, is a significant weakness and failure.

Q11) Will the spatial strategy promote the vitality of town centres in the District and support a prosperous rural economy, as required by national policy?

32. By focussing such a significant proportion of growth and investment in new settlements, SDC is failing to use its spatial strategy to promote the vitality of town centres or support a prosperous rural economy.
33. Indeed, at a time when town centres and the rural economy are badly in need of help and assistance, the Council's strategy risks making their plight harder and causing further harm to the local economy.
34. There are very few facilities planned for PS37 (Tier 3a). Consequently, new residents will be heavily dependent upon their cars for journeys elsewhere for access to a wide range of retail and leisure facilities and services. There is likely to be heavy reliance on Cam and Dursley centres to meet more basic needs, and given the length of the pedestrian route and constraints along it, residents of PS37 are more likely to drive leading to more traffic and congestion in the town centres which is not conducive to improving their vitality.

Q14) Overall, will the spatial strategy meet the overarching strategic objectives and achieve the Council's vision?

35. No. In the case of PS37, the Council states that it has produced a Sustainable Transport Strategy (STS) (**EB60a-60c and EB108**) to ensure that new strategic developments deliver on the overall Plan objectives to reduce the environmental impacts of transport and to support a transformative rebalancing of the transport network in favour of sustainable forms of transport.
36. The Draft Plan claims that the STS has identified a number of interventions for this site which should be embedded within the layout and design of the development and delivered at an early stage to ensure that sustainable transport enhancements are prioritised above the

provision of additional highway capacity. SPC believe that the huge cost of addressing associated transport impacts, together with unrealistic modal shift assumptions, means that PS37 would be incapable of meeting the strategic objectives or vision.

37. The above claim fails to stand up to close scrutiny. SPC believes that in reality, PS37 will be no more than a dormitory settlement that is heavily dependent upon the private car for the majority of journeys, and which will add to existing congestion hotspots nearby.

Q16) New settlements are proposed within the Plan, at Sharpness and Wisloe, but are not included in the settlement hierarchy. The approach in the Plan is to define these as settlements through a future Local Plan Review. Yet reference is made to ‘anticipated’ local centres within these settlements within Core Policy CP12

- a. **Why are these proposed new settlements not in the hierarchy?**
- b. **If housing and employment growth will be centred at these new settlements, how will the distribution of growth in the Plan reflect the settlement hierarchy if they are not included within it?**

38. The Plan anticipates⁵ that Hunts Grove and the new settlement at Sharpness will both include sufficient local facilities to achieve Local Service Centre status (Tier 2) in the future; while PS37 will function as a new Accessible Settlement with Local Facilities once complete (Tier 3a)⁶.
39. There is currently a distinct lack of evidence to demonstrate that PS37 would be a functional settlement capable of supporting a healthy range of jobs and services. SPC believe that, at best, PS37 will only be capable of providing basic retail facilities and thus could only have a low position in the District’s retail hierarchy. This demonstrates its lack of overall sustainability whilst the reluctance of SDC to identify it in the settlement hierarchy at this stage reflects the uncertainty over the role it could perform.
40. Its constrained position with hard boundaries including the M5, railway and existing settlements of Gossington, Slimbridge and Cambridge mean that it would not have capacity to absorb additional growth in the future without encroaching further into the existing settlements. Therefore, if allocated and ever built, its standing in any future settlement hierarchy would need to reflect the fact that it is not a sustainable location to meet longer-term needs.

⁵ Paragraph 2.4.7, Stroud District Local Plan Review Pre-submission Draft Plan (Regulation 19 Consultation) May 2021 [CD1]

⁶ See also SPC’s responses to Q’s.5, 6 and 14 above.

Q18) Have implications of the larger strategic allocations on the existing settlements and their place within the settlement hierarchy been robustly assessed?

41. Combining PS37, with developments in Cam and Dursley will produce an urban sprawl from the Cotswold Escarpment to the west end of Slimbridge. A valid assessment has not been made by either SDC or the Promoters of this combined effect. Furthermore, the approach would also undermine efforts to promote the vitality of town centres and pose a significant danger that Slimbridge and Cambridge will lose their current identities as small rural communities⁷.

Q20) Settlement development limits (SDL) or boundaries have been identified. Appendix A details proposed changes to some existing SDL on the policies map.

a. Is it clear how SDL have been defined and are they justified and effective?

42. The changes to the Cambridge SDL at both Narles Road / Barton Field and Ryalls Court are noted.
43. SPC believe the SDL's for PS37 and Slimbridge/Cambridge are not justified as PS37 effectively coalesces Slimbridge and Cambridge with Cam/Dursley.

Q.22 The text on page 23 of the Plan also states that some limited development on small and medium sites immediately adjoining SDL for tiers 1-3 will be allowed, to meet specific identified local development needs.

b. Is it clear how local needs will be defined and what will be the criteria for this?

44. Part of the Slimbridge Neighbourhood Development Plan (NDP) evidence base is a report on local housing needs. The report was based on two surveys; a questionnaire in March 2021, and an independent housing needs survey conducted in September 2021 by Gloucestershire Rural Community Council. The NDP Steering Group produced a report comparing the two surveys, which was issued on 17 February 2022. It concluded that the NDP Steering Group would not issue a call for housing sites. In addition, it was also noted that the Homeseeker plus data base could not identify local needs, was not fit for purpose and this was confirmed by SDC. Furthermore, the SDC Self Build Register was of little use in assessing the need for self-build plots.
45. It is evident, therefore, that SDC currently has a lack of robust data on local development needs⁸.

⁷ See also SPC's responses to Q's.5, 6, 14 and 16 above.

⁸ See also SPC's response to Matter 3 (Housing Need and Requirement)

Q23 Paragraph 2.3.12 of the Plan also sets out support for some development at tier 3b, 4a and 4b settlements of small sites up to 9 dwellings outside of defined settlement limits, provided that the policy is supported by the local community.

c. How will the Council determine that the policy is supported by the local community? Will this be at the point of adoption? If so, what is the purpose of this supporting text?

46. The NDP Questionnaire Residents' Views report (May 2021) noted that 82% of residents supported developments of up to 4 houses, 32% supported developments of up to 20 houses and 7% supported developments of over 20 houses. Only 10% supported developments outside the settlement boundaries. The NDP supports Para 2.3.12 in the DLP but only if a local need is identified and is supported by the residents of the Parish.

Q26) Overall, is the settlement hierarchy and how it relates to the development strategy clearly explained within the Plan and is the approach justified, effective and consistent with national policy?

Q27) Is the site selection methodology justified and does it accord with national planning policy and guidance?

Q28) Has the site selection process been suitably informed by relevant studies/assessments and site constraints, and has it included a robust assessment of development impacts?

47. No, see our responses to Q's.5, 6, 14 and 16 above.

Q29) Has the sequential test, and exception test where necessary, been correctly applied in the assessment of flood risk (including surface water flooding) for the selection of potential development sites? Is this adequately evidenced for all sites as part of the site selection process? Do any of the sites in the Plan fall within, wholly or partially, Flood Zones 2 or 3?

48. In December 2020, surface water flooding from Lightenbrook caused the closure of the A38 and flooded buildings and housing in Slimbridge. The flood mitigation measures proposed for PS37 need to cope with the combined impacts of additional housing in Cam (especially at Draycott) and climate change. PS37 adjoins Flood Zone 2 and 3 areas in Cambridge and will inevitably increase flood risk for residential properties in the settlement.
49. SPC considers that sequential and exception tests have not been correctly implemented regarding the risk of surface water flooding, their impact on PS37 and downstream communities in Slimbridge and Cambridge. It is unacceptable to wait until the detailed planning application stage, as the combined flood effects may be insurmountable. This issue should, therefore, be resolved before the DLP progresses.

Q30) Overall, has the process robustly identified and assessed all relevant sites?

- 50.** No, in relation to PS37 we consider that the site's allocation assessment has failed to have adequate regard to the serious site related deficiencies and costs associated with the proposed scheme.
- 51.** As a consequence, we consider that PS37 would be undeliverable as it would be incapable of providing policy compliant development whilst meeting all the infrastructure costs associated with the scheme. Furthermore, we believe that the premium applied to assumed development prices at PS37 to reflect garden town principles is both inappropriate and unachievable⁹.

⁹ See also SPC's responses to Q's.5, 6, 14 and 16 above, and its Matter 1 Hearing Statement