

Part B – Please use a separate sheet for each representation

Name or Organisation: **Slimbridge Parish Council**

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="√"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="√"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="√"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see the attached representation.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see paragraph 5.9 of the attached representation.

(Continue on a separate sheet /expand box if necessary)

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Slimbridge Parish Council wish to be represented at the Examination Hearing as the complexity of the issues raised in our representations can only be fully investigated through an oral examination.

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*





Slimbridge Parish Council

PO Box 122, Dursley, GL11 9BZ

Tel: 07943 894637

E-mail: clerk@slimbridge-pc.gov.uk

Website: www.slimbridge-pc.gov.uk

20th July 2021

Slimbridge Parish Council strongly object to the draft Stroud District Local Plan Review.

The Parish Council have commissioned JB Associates to prepare and submit representations on its behalf.

Slimbridge Parish Council have also worked alongside Wisloe Action Group throughout these consultations. Both groups are separate entities but have the same objectives in responding to the Local Plan and have therefore shared resources to produce various reports.

Based on all the reports received and reviewed by JB Associates, the attached document is Slimbridge Parish Council's representation which explains why draft Policy PS37 of the Regulation 19 Draft Local Plan Review should be deleted in order for the plan to be found sound.

Stroud District Council

07/21

Consultation on Stroud Local Plan Review (Regulation 19) Pre-Submission Document

Representations on Wisloe New Settlement (Policy PS37) on behalf of Slimbridge
Parish Council



jb planning associates

Chells Manor, Chells Lane, Stevenage, Herts, SG2 7AA

e-mail info@jbplanning.com url www.jbplanning.com

tel 01438 312130 fax 01438 312131



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1 Introduction & Summary

- 1.1** This representation has been prepared on behalf of Slimbridge Parish Council (SPC) in response to Policy PS37 of the Stroud Local Plan Review (Regulation 19) Pre-Submission Document (hereafter referred to as the 'LPR').
- 1.2** SPC strongly object to the allocation on the basis that it is an unsuitable, undeliverable and fundamentally an unsustainable location to accommodate the development proposed in the LPR.
- 1.3** In section 2 of this representation, we explore the background to the proposed allocation of Wisloe New Settlement. We explore how it came to be identified as an allocation, through reviewing the various stages of the plan making process. In doing so, we highlight the unresolved issues raised by SPC and other parties including Wisloe Action Group (WAG); a group of residents living in the Parish who are deeply concerned about the new settlement proposals. We also comment on the inadequacies of the public engagement previously undertaken by Stroud District Council (SDC) in preparing the LPR and its failure to respond objectively to consultation responses. Consideration is also given to SDC's failed bid to Homes England for Garden Communities Bid Funding to support the delivery of Wisloe New Settlement.
- 1.4** Through the review carried out in Section 2 we demonstrate that SDC's decision to continue to include Wisloe New Settlement in the Regulation 19 LPR is not supported by evidence nor the outcomes of consultation in the plan making process. Furthermore, and reflecting the identified flaws, we highlight it was not a decision which Members of SDC's Planning Review Panel agreed on.
- 1.5** In section 3, we open by exploring the proposals in the LPR for the proposed Wisloe New Settlement allocation and note that the Council expects it to deliver significant social and economic benefits (according to Garden City Principles), whilst fully mitigating environmental impacts in terms of biodiversity net gain, design and layout to address its multitude of constraints. Most notably, reflecting the Council's climate change commitments, the new settlement is expected to be an "exemplar for achieving carbon neutral development by 2030".

- 1.6** We demonstrate through technical evidence and other available information that these aspirations for Wisloe New Settlement are fundamentally unrealistic and unachievable; they are simply not deliverable and if the LPR is to have any chance of being found sound at Examination the proposed allocation should be deleted.
- 1.7** In Section 3 we also present the findings of review of the Sustainability Appraisal that supports the LPR undertaken by Clearlead Consulting. This review identifies several issues of non-compliance with the Strategic Environmental Assessment (SEA) Regulations. Notably, using current knowledge, Wisloe New Settlement does not perform as well as the findings of the SA has recorded and appears to be a much less sustainable option than the SA would suggest.
- 1.8** Lastly in Section 4 of these representations, we consider the implications on the overall housing supply if Wisloe New Settlement is removed. We demonstrate that the objectively assessed housing need for the Plan period (including any unmet needs from neighbouring authorities) can still be met, including an adequate buffer.
- 1.9** We conclude by summarising why the proposed Wisloe New Settlement Allocation fails the tests of soundness and should therefore be deleted from the LPR prior to submission.

2 Wisloe New Settlement Background

Site Overview

- 2.1** Wisloe is the name given by the Site Promoters (Gloucester County Council and the Ernest Cook Trust) to a new settlement proposed on approximately 84 hectares of agricultural land within the Parish of Slimbridge. It is located to the east of Slimbridge and Gossington and south of Cambridge on land between the A38, M5 and Bristol-Birmingham railway line. The proposed allocation boundary (as identified on the plan on page 182 of the LPR) includes 4 development parcels, separated by existing roads (including the A4135 and Dursley Road), residential properties, farm buildings, Slimbridge Football Ground and industrial development. These existing properties and uses lie outside the settlement boundaries of Slimbridge and Cambridge.
- 2.2** Slimbridge is recognised as a Tier 3b settlement in the LPR (i.e. a Settlement with Local Facilities). These are defined in draft Policy CP3 as **‘small and medium-sized rural villages [which] provide a range of services and facilities for their communities, but some have poor access to key services and facilities elsewhere and they all face significant environmental constraints to growth. There are no site allocations at any of these settlements. However, there may be scope for some development to meet specific local housing, employment or community infrastructure needs, either within or (exceptionally) adjacent to the settlement development limit, subject to fulfilling the criteria set out in this Plan’s Core and Delivery policies. Any such development will seek to sustain or enhance the settlement’s existing role, function and accessibility.’** (*emphasis added*)
- 2.3** Cambridge is recognised as a Tier 4a settlement in the LPR (i.e. an Accessible Settlement with Basic Facilities). These are defined in draft Policy CP3 as **‘small and very small villages [which] provide a limited range of services and facilities for their communities. Whilst they may be unable to meet residents’ day to day requirements, these are relatively well-connected and accessible settlements, which benefit from their proximity and/or connectivity to higher tier settlements or transport corridors. These settlements are relatively less sustainable locations for growth, compared to Tier 1-3 settlements, and most face significant environmental constraints. However, there may be scope for very limited**

development to meet specific local housing, employment or community needs, either within or (exceptionally) adjacent to the settlement development limit, subject to fulfilling the criteria set out in this Plan’s Core and Delivery policies. **Any such development will seek to sustain or enhance the settlement’s existing role, function and accessibility and to boost community vitality and social sustainability.**’ (emphasis added)

2.4 There are proposed changes to the Settlement Development Limits (SDL) for Cambridge that are set out in Appendix A of the LPR. These have the effect of extending the settlement boundary to the south and, notably, up to the proposed allocation boundary for Wisloe New Settlement.

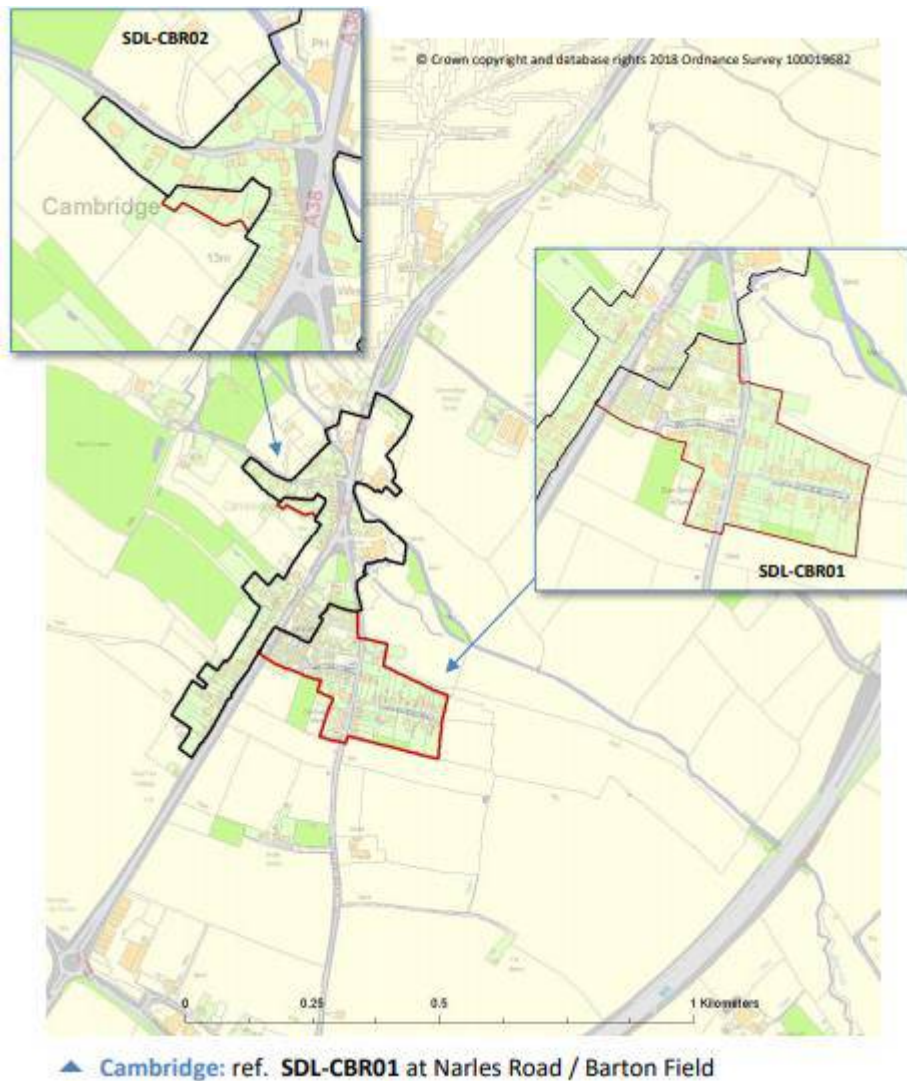


Figure 1: Extract from Appendix A of LPR showing proposed changes to the SDL for Cambridge

2.5 The Stroud District Settlement Role and Function Study (Update 2018) provides details on the information gathered by SDC on the key characteristics and functioning of settlements in the District and informed decisions with respect to the standing of settlements in the settlement hierarchy. Below is a summary of the data that relates to Slimbridge and Cambridge and supports their standing as lower tier settlements:

Statistic	Slimbridge	Cambridge
Population Count (2011 census)	795	No data
Number of dwellings (2011 census)	324	No data
New dwellings (2011-2018)	11	No data
Retail provision	Community run shop [NB: this is no longer open]	None
Community facilities	Mobile/part time post office	None
Education	Primary school / pre-school	None
Recreation and cultural facilities	Place of worship Village hall Playing Field Children's play area	Pub
Accessibility to key services and facilities	Poor	Good [NB: SPC question this assessment noting Cambridge's Tier 4a status]
Employment role	No significant employment role. A 'dormitory' settlement	No significant employment role. A 'dormitory' settlement
Proportion of residents who work within 2km of home	5%	No data
Case for growth?	Offers little scope for sustainable growth or for development that could transform poor accessibility...	In accessibility terms, offers relatively sustainable location for potential growth and development,

	unsuited to growth and development, other than to address very specific identified local needs within the community (pg.121)	despite lower tier status / smaller size. [NB: SPC again question this assessment noting Cambridge's Tier 4a status]
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Table 1: data related to Slimbridge and Cambridge from the Stroud District Settlement Role and Function Study (Update 2018)

2.6 A further useful source of information, when considering the existing characteristics of the Parish is the Slimbridge Village Design Statement (SVDS) which was adopted by SDC in February 2017 and is a material consideration in Development Management decision making and an important evidence base document to the LPR. The purpose of this statement is to raise **‘awareness of what is special about the area and gives parish residents a say in the future of their village by producing guidance on respecting these qualities.’**¹ A map on Page 3 of the SVDS illustrates how the parish is defined by a dispersed settlement pattern comprising two villages (Slimbridge and Cambridge) and six separate hamlets. The spire of St Johns Church is described as **‘a prominent feature within the landscape of Slimbridge as it can be seen from most areas and it is a defining feature of the parish’**².

2.7 The SVDS, 2017 includes a number of guidelines, one of which is SLN 2. This states: **‘in order to protect the separate identity of the villages and hamlets and the quality of the countryside (including its built and natural heritage), proposals outside identified settlement development limits will not be permitted that do not accord with the principles in the Adopted Stroud District Local Plan (2015) and particularly where they also involve the loss of quality landscape features or result in an adverse impact on local character. It is important to prevent the areas merging into one another so as each hamlet can keep its own identity and preserve its setting and character.’**³ (*emphasis added*)

¹ Slimbridge Village Design Statement, 2017 Page 5

² Slimbridge Village Design Statement, 2017 Page 7

³ Slimbridge Village Design Statement, 2017 Page 42

2.8 In contrast with the dispersed small scale settlement pattern found in Slimbridge, south of the M5/railway corridors in Cam parish, is one of the District's main settlements (Cam). As explored further below, significant growth is underway within the northern part of Cam, east of the A4135, between the existing defined settlement boundary and Cam & Dursley Station.

Committed and Proposed Growth to the North of Cam

2.9 One of the strategic sites allocated by the adopted Local Plan (2015) is an urban extension of 450 dwellings to the northeast of the settlement, known as 'Millfields'. Since the Plan was adopted outline planning permission was granted in 2017 for a mixed-use development on this allocated site (and an additional field to the north) comprising of up to 450 dwellings and 10.7 hectares of employment land (Ref: S.15/2804/OUT).

2.10 Since the grant of outline permission, a reserved matters approval has been granted for 137 dwellings on Phase H1 and this is now under construction by Bovis Homes. A further outline planning application has also been made to increase the maximum number of dwellings permitted in the urban extension by 56 to 506 dwellings. This application (ref: S.20/1116/OUT) remains undetermined.

2.11 It is also notable that in recent years, SDC has granted planning permissions for a number of major housing developments outside the Cam settlement boundary on unallocated greenfield sites to the north-west of the urban extension. This includes:

- **S.17/1366/OUT:** Outline Planning Permission granted for up to 90 residential dwellings. A reserved matters application (ref: **S.19/0810/REM**) has since been approved and development has commenced.
- **S.17/0964/OUT:** Outline Planning Application granted for up to 36 dwellings. A reserved matters application (ref: **S.19/1519/REM**) has since been approved.
- **S.18/0044/FUL:** Full Planning Permission granted for 41 dwellings. This development has commenced.
- **S.11/1682/FUL:** Full Planning Permission granted on appeal for 71 dwellings. This permission has been implemented and the development completed.

- 2.12** A further outline planning for up to 42 residential dwellings (**S.18/2697/OUT**) on land between **S.17/1366/OUT** and Cam & Dursley Railway Station has recently been approved by SDC, subject to completion of a Section 106 agreement.
- 2.13** The LPR review proposes further development to the west of the above sites; an allocation referred to as “Cam North West” in draft Policy PS24 allows for approximately 900 dwellings and community uses. An EIA scoping request for a residential mixed-use development for up to 1,100 dwellings, new primary school, and other associated infrastructure was submitted in June 2020 (ref: 2020/0314/EIAS).
- 2.14** The cumulative impact of the above is the extensive expansion of Cam in a northerly direction up to the M5 (and Cam Parish boundary), immediately beyond which is the proposed settlement boundary of Wisloe within Slimbridge Parish. This is illustrated on Figure 1 of the Michelle Bolger Expert Landscape Consultancy Site Appraisal (MBELC) (Feb 2021), which is included at Appendix 1 of these representations and identifies through coloured coded parcels the various developments identified above.
- 2.15** The scale of growth to the north of Cam, however, is not adequately reflected by the plan on page 182 of the LPR (included as Figure 2 below) which is misleading in omitting developments approved on unallocated sites and the approved extent of the Millfields urban extension. The plan also does not reflect the proposed southerly extension to the SDL for Cambridge (as discussed earlier in the representation) which would join the site allocation boundary for Wisloe with this existing village. The implications of this in terms of coalescence and the harm to the existing settlement pattern of Slimbridge Parish are considered further in Section 3 of this representation.

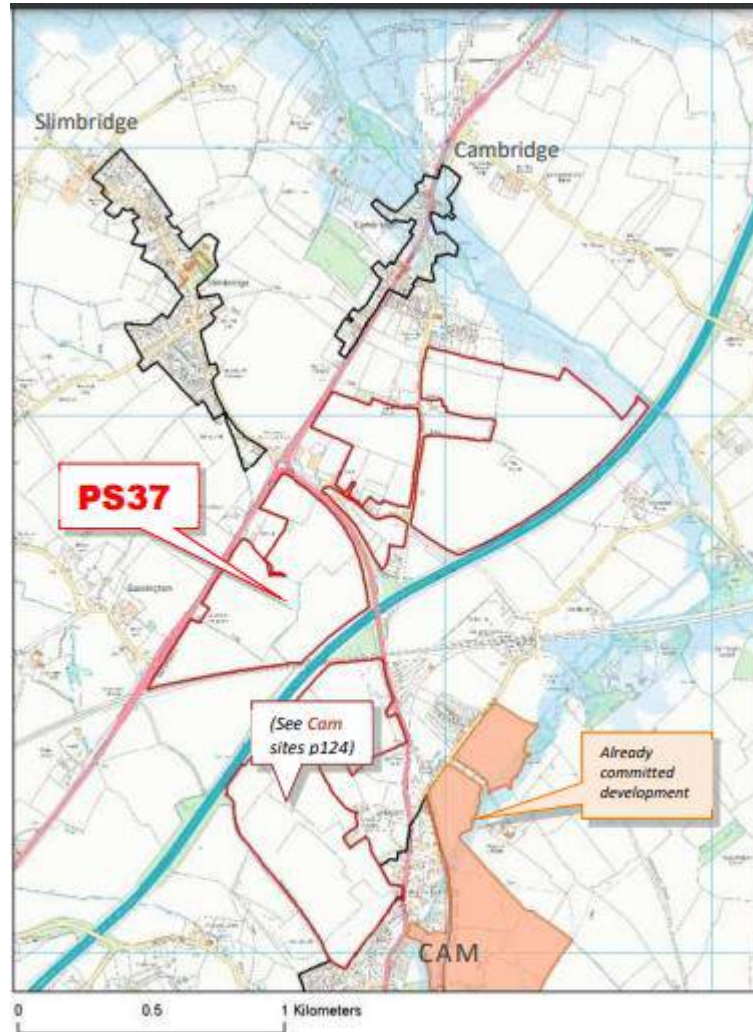


Figure 2: Wisloe Site Location Plan taken from page 182 of the LPR

Local Plan Review Process and emergence of Wisloe as a new Settlement Option

2.16 Having provided an overview of the Wisloe site and its surroundings, in this section we explore how it came to be identified as an allocation, through reviewing the various stages of the plan making process. To-date, the review process has involved four consultation stages:

- Stage 1 - **Issues and Options** (October 2017 - December 2017).
- Stage 2 - **Emerging Strategy** (November 2018 - January 2019).
- Stage 3 - **Draft Local Plan** (November 2019 - January 2020).
- Stage 4 - **Additional Housing Options** (October 2020 - December 2020).

2.17 The **Stage 1 Issues and Options Consultation** was introduced as an opportunity to discuss emerging issues and identify ways of distributing and managing future development needs for the 20-year period to be covered by the LPR (which at this stage was 2016-2036).

2.18 Whilst making clear that the amount of future housing and employment growth needed for the LPR period had not yet been identified, Section 3.1 of the consultation paper presented potential strategies for distributing future growth. The Options presented included:

- 1) Concentrated development:** continuing the strategy of the adopted Local Plan of allocating mixed-use development at a few larger sites adjacent to the District's larger settlements.
- 2) Wider distribution:** take a more dispersed approach with some medium sized housing and employment sites on the edge of the larger villages, as well as towns.
- 3) Dispersal:** disperse development across the district with most villages including at least one small to medium site allocated to meet local needs.
- 4) A single growth point:** Identify a growth point in the district to include significant growth, either as an expansion of an existing settlement, or to create a new settlement.

2.19 Consultees were asked to identify their preferred option or combination of options to meet the unspecified future needs. A report prepared by the Council on the outcomes of this consultation⁴ reveals that the Council received 258 formal responses, almost 60% of which were from individuals. SPC were amongst the 26 town and parish councils which responded to this consultation.

2.20 The consultation report reveals at paragraph 3.24 that the question regarding future growth strategies was answered by 127 people and the results displayed in Figure 9 show that the greatest support was for concentrated growth, with 46 people selecting it as their preferred option. 22 people supported some dispersed growth, 22 supported a new growth point and 20 people supported very dispersed growth.

⁴ Stroud District Local Plan Review: Issues and Options Consultation Report (February 2018)
jb planning associates representations

2.21 Paragraph 3.26 of the report goes on to identify that a ballot box was located at each public exhibition where people were asked to anonymously identify their preferred option for growth. Of the 199 ballots completed, the future growth option with greatest support was again concentrated growth (61 votes), followed by dispersal (Option 3) with 37 votes. The option with least support was a new growth point (21 votes).

2.22 Broad locations and potential sites were also considered in the consultation. Wisloe was not identified as growth point option at this stage, although some smaller scale growth to the south of Slimbridge was put forward as a potential option (see 'A' on figure 3 below).

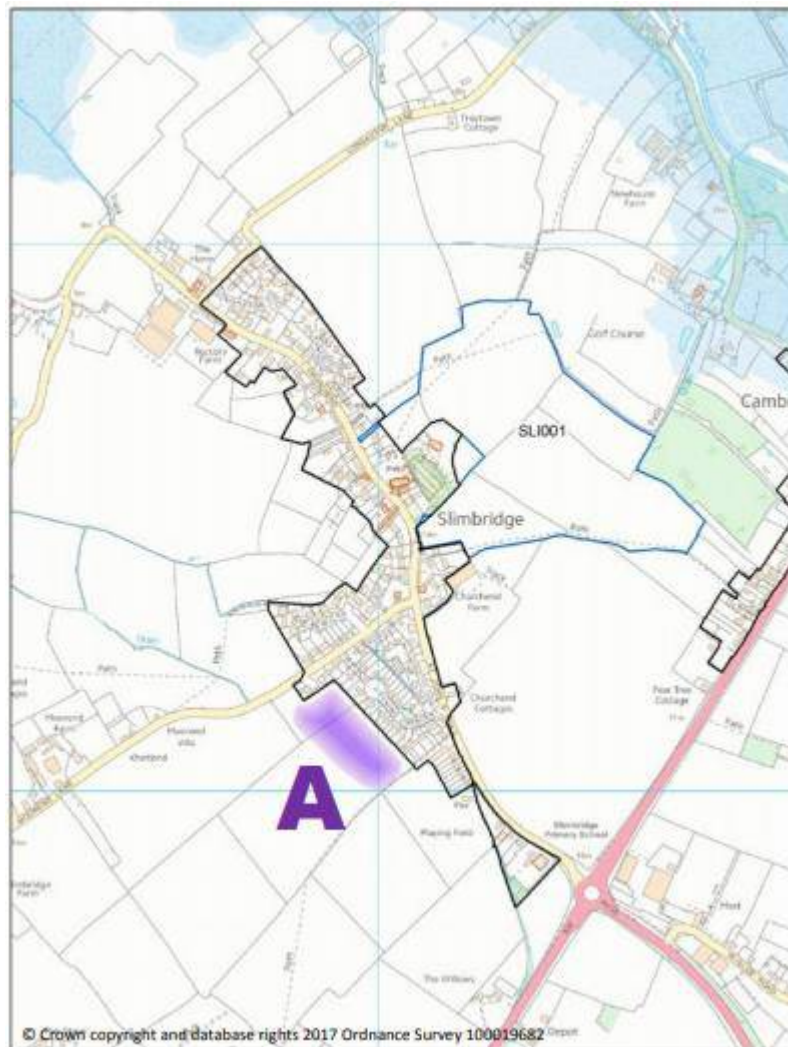


Figure 3: Slimbridge potential growth point 'A' as presented in the Issues and Options Consultation Document

2.23 The plan also identifies with a blue line a site that was assessed in the 2017 Strategic Assessment of Land Availability (SALA) but considered unsuitable (i.e. SLI001 – Land off St John’s Road). Appendix 4 of the 2017 SALA reveals the Council’s reasons for rejecting SLI001 were as follows:

‘This large area is generally not suitable for development because of the likely impact on an area of high/medium landscape sensitivity, and particularly the role this historic landscape plays in providing a setting for nearby heritage assets and in helping to define the character of the settlement as distinct from Cambridge. Furthermore, there are potential constraints which might affect the ability to create a new site access. There are therefore potential impacts and some physical constraint that would prevent sustainable development in this location.’

2.24 SDC’s SALA Heritage Impact Appraisal (2017) elaborates on the heritage sensitivities, concluding as follows:

‘Very significant heritage constraints. This is a very historic landscape. The site adjoins and wraps around the ancient core of Slimbridge, centred upon the landmark Grade I listed Church of St John the Evangelist. There is an extremely high concentration of heritage assets in the immediate vicinity, most of Slimbridge sites SALA Heritage Impact Appraisals (May 2017) SLI 2 which are linked with the church. The legacy of historic land management on the site itself is clearly visible: pronounced ridge and furrow or drainage channels are easily discernible across an extensive area. The site is important in providing visual and historic context for this ancient settlement and its numerous heritage assets. The site’s sensitivity relates to the sense of Slimbridge’s place in the landscape, its character and its historic linear settlement pattern, and the dominance of the church – visually and historically. No obvious scope for development that would have any positive heritage benefits. The impact on the setting of multiple heritage assets and on the character and context of the settlement – particularly key views of the landmark Grade I listed Church and the surroundings of the scheduled moated site – would be likely to preclude development on this site.’

2.25 Notably the SLI001 site is approximately 300m northwest of the proposed boundary of Wisloe New Settlement. The landscape and heritage sensitivities of this area are considered further in section 3 of these representations.

2.26 Following the Stage 1 Issues and Options, a SALA New Sites Update Report was published in October 2018. This report considered the suitability, availability, achievability and development potential of additional sites submitted after the production of the main SALA 2017 report.

2.27 This is when Wisloe New Settlement first appeared, although it was not assessed as a single site option, but rather as three separate parcels: SLI002, SLI004 and SLI005, that were submitted following production of the May 2017 SALA. These are identified on the plan included at Appendix 2. A concern regarding adverse impacts on settlement separation was identified in relation to the assessment of suitability of each of these sites, which clearly highlighted **‘Piecemeal development in this area would erode the countryside gap between Slimbridge, Cambridge and Cam’**.

2.28 Confusingly, despite separation being identified as a concern in relation to the individual sites SLI002, SLI004 and SLI005, each site assessment also included a statement that there may be potential for a more comprehensive development if additional land assembly were to occur. The landscape consequences and coalescing effect of such an approach are considered further in Section 3 of this representation.

2.29 Other concerns raised with these parcels included:

- No screening to M5 which is elevated above the site as it crosses the railway line (SLI002).
- Proximity to the M5 may result in noise and visual amenity issues which would require mitigation (all three sites).
- Proximity to the A4135 may result in noise and visual amenity issues which would require mitigation (SLI002).
- Proximity to the railway line may result in noise and visual amenity issues which would require mitigation (SLI004).
- Proximity to the A38 may result in noise and visual amenity issues which would require mitigation (SLI004). Inexplicably, the same concern was not highlighted for SLI002 even though it is also adjacent to the A38.

- There is reasonable proximity to services and facilities in Slimbridge and local pavements on the A4135 and A38 although access would involve crossing the busy A38 (all three). The assessment also notes that there is no pavement along the Dursley Road/Wisloe Road which would be an accessibility issue for SLI005. However, it fails in the case of all three sites to acknowledge the fact that Slimbridge is a Tier 3b settlement (and Cambridge a Tier 4a) that do not offer a range of services and facilities.
- The owners of SLI002 (Gloucester County Council) and SLI004/SLI005 (Ernest Cook Trust) have confirmed that the sites are not available currently but that there is a reasonable prospect that they will be available at a point in the future for development. Despite this uncertainty, the housing yield suggests deliveries could commence on each from 2026/27.

2.30 Other points to note in the assessments include:

- They identify that an initial desktop biodiversity and geodiversity assessment of all three sites has indicated there is potential to develop them without harm to a designated natural environment site, although this did not consider whether there are protected species on the sites or whether it is functionally linked land.
- All three are identified as being **'beyond the immediate vicinity of Slimbridge'** and were not included in the Landscape Sensitivity Assessment. In this respect, we consider it surprising that sites on the opposite side of the A38 to the eastern edge of Slimbridge (i.e. SLI002 and SLI004) are not considered to be in "immediate vicinity" of the settlement, particularly as the SALA describes this landscape as open, flat agricultural land. Furthermore, reference to the Gloucestershire Landscape Character Assessment (2006) and Stroud Landscape Character Assessment (2000) reveals that the land across which all three sites are located is in the same character area as Slimbridge. The failure of SDC to assess the landscape sensitivity of the sites that form the proposed Wisloe New Settlement allocation is a notable omission in the site selection process.
- An initial desktop heritage assessment of all three has indicated that there is potential to develop the sites without harm to a designated heritage asset. It is unclear which desktop assessment is being referred to here as none of the three sites have been considered in the published Heritage Impact Appraisals of the SALA sites (2017, 2018, 2019 and 2020). Such a conclusion is again surprising, particularly for SLI002 which is approximately 300m from SLI001 which, as

identified above, was rejected by SDC due to “**very significant heritage constraints. This is a very historic landscape**” (emphasis added).

- They report that there are no known flooding issues on all three sites, despite part of SLI005 being in flood zone 2 and there being evidence of flooding within the Parish in the Slimbridge Village Design Statement (adopted by SDC) and ongoing issues (known to the drainage authorities) with the sewage system being unable to cope with high groundwater and storm conditions. These are considered further in Section 3 of this representation.
- It fails to recognise other site constraints identified in these representations, such as the high-pressure gas main, agricultural land quality, air quality and safeguarded minerals.

2.31 The Stage 2 Emerging Strategy Consultation (November 2018) followed the SALA update and presented the Council’s potential strategy for addressing the issues raised in the Stage 1 consultation and meeting future development needs. It highlights on page 27 that Option 1 (concentrated growth) was the most popular growth strategy in the feedback to the Issues and Options Consultation, adding Option 3 (dispersal) was the next most popular strategy based on visitors’ informal responses at our Issues and Options touring exhibitions. It goes on to identify on page 30 the Sustainability Appraisal recommendation that a hybrid option be considered which most resembles option 1 but includes growth at the Sharpness growth point and/or one or two of the larger towns and villages as well (although this would need to avoid settlements where negative environmental effects on biodiversity/geodiversity, landscape/ townscape, historic environment, water quality and flooding are more likely).

2.32 It is this hybrid option which is presented in section 4.2 of the consultation document as the following ‘Emerging Strategy’:

- concentrate housing growth at the main towns of Cam and Dursley, Stonehouse and Stroud, where there is best access to services, facilities, jobs and infrastructure
- two new settlements at Sharpness and at Wisloe within the Severn Vale (A38/M5 corridor) where there is the potential to create new sustainable communities along garden village principles.

2.33 Very limited additional information is presented in the document on the Council's strategy for Wisloe (which incidentally is not an existing 'place' as inferred by the consultation document). Page 34 simply states that the strategy envisages the delivery of a new garden village community incorporating housing, employment, shopping, community and open space uses, with the opportunity to improve access to local facilities for existing residents and businesses whilst protecting the setting of existing villages. Page 83 adds to this by offering a limited review of the constraints and designations and identifies that a proposed settlement boundary and requirements for it to provide 1,500 dwellings by year 2040, 5 ha employment land, retail, community uses and open space.

2.34 SPC responded to this consultation, strongly objecting to the proposed identification of Wisloe New Settlement and raised the following concerns:

- The proposed development will result in merging of Slimbridge, Cambridge and Cam into one urban sprawl with only the motorway acting as a buffer. This will take away the individual identities of Slimbridge Parish settlements.
- Wisloe will be 3 times the size of the existing settlements of Slimbridge Parish combined. This is out of proportion for the parish and will be unsustainable.
- The environmental impacts of the proposal on the local Wildlife and Wetland Trust.
- The land is Grade 2 which is deemed very good agricultural land.
- The inaccessibility of Cam and Dursley Station to walkers/cyclists.
- The inability of the existing sewage infrastructure to cope.
- The noise and air quality issues associated with the adjacent motorway.
- Visual impact on views from the AONB and on heritage assets.

2.35 The complete comments are provided at Appendix 3 of this representation. SDC again produced a report on the outcomes of this consultation process⁵. Paragraph 3.40 identifies that those respondents who submitted their comments online were asked to clarify which settlements identified as potentially suitable for growth, they disagreed with. The results from the 135 respondents who answered the question are displayed in Table 4. The highest number of respondents disagreed there was growth potential at Berkeley (38%), Newtown & Sharpness (38%), Dursley (29%), Slimbridge (24%) Wisloe (21%).

⁵ Stroud District Local Plan Review: Emerging Strategy Consultation Report (May 2019)

- 2.36** Table 6 illustrates that level of support or opposition to each site. This identifies 39 respondents supported PS37 Wisloe and 83 opposed.
- 2.37** No comments were offered in the report on the valid concerns raised by SPC (and others) on the Wisloe New Settlement proposal. As explored further in Section 3 these concerns still have not been addressed by SDC despite them being highlighted at such an early stage in the plan making process. As will become apparent through the analysis in Section 3, the decision to identify Wisloe as a new settlement proposal in the LPR was made in advance of the completion of the technical work necessary to properly understand the impact of the numerous known constraints on the deliverability of the site.
- 2.38** Two additional parcels of land which make up the remainder of the Wisloe New Settlement allocation (as currently defined in the LPR Regulation 19 Plan) were submitted around the time of the Stage 2 Emerging Strategy Consultation and assessed as part of SALA New Sites Update Report (November 2019). These sites are SLI006 and SLI007 and were put forward by the landowners MD Collins and the Berkley Estate respectively and are identified on the plan included at Appendix 2. Both sites were found to have ‘future potential’ due to their proximity to land identified with potential for a comprehensive development. Under the suitability assessment of site SLI006 it states, **‘Given the proximity with Cambridge, any development on this site would need to include the creation of a substantial landscaped buffer to prevent coalescence with Cambridge’**. Given the immediate proximity of this site to Cambridge, it is hard to conceive of a landscape buffer which would be sufficient to prevent harm to the legibility/ identity of Cambridge as a discrete settlement particularly given the proposed changes to the SDL for this existing settlement as identified above.
- 2.39** The **Stage 3 Draft Plan Consultation** followed in November 2019 and presented SDC’s preferred strategy for meeting growth and development needs for the Plan period. This is presented on page 25 as **‘a ‘hybrid’, which incorporates some of the most sustainable and deliverable aspects of the four strategy options we consulted on in 2017 and makes use of the most suitable potential sites’**.
- 2.40** The proposals for Wisloe Garden Village are presented on pages 122 to 124. It identifies that the Draft Plan anticipates **‘it will function as a new ‘Accessible**

Settlement with Local Facilities' once complete (Tier 3a), with access to services and employment opportunities within the development itself, as well as in higher tier settlements to which there is good access'. Whilst highlighting that detailed policy criteria, specific mitigation measures and infrastructure requirements are still to be developed, the Draft Plan makes a bold and premature commitment that the 'development will an exemplar for achieving carbon neutral development by 2030 and will take place in accordance with Garden City Principles'.

2.41 SPC responded to this consultation, again strongly objecting to the proposed identification of Wisloe New Settlement. By this point also Wisloe Action Group (WAG) had also been established by a group of deeply concerned residents living in the Parish who wanted to support SPC with its objections. The representations made by both SPC and WAG on the Stage 3 Draft Plan are included at Appendices 4 and 5 and raised the following:

- Identification of the new settlement does not support public feedback on the Council's preferred spatial strategy for growth.
- Failure to meet several Sustainability Appraisal objectives.
- The low ranking of Slimbridge and Cambridge in the settlement hierarchy, reflecting the unsustainable location.
- The inaccessibility of Cam and Dursley Station to walkers/cyclists.
- Coalescence and the erosion of the separate identities of Slimbridge and Cambridge
- Impact on the local Wildfowl and Wetlands Trust, and wildlife on site
- Loss of Grade 2 BMV agricultural land, and flaws with promoters assessment
- Failure to properly evaluate flood risk, drainage and water quality issues.
- Noise and air quality issues associated with the adjacent motorway.
- Strain on existing infrastructure and issues associated with the delivery of new social and transport infrastructure required to support settlement.
- The issues associated with a high pressure gas main crossing the site.
- Visual impact on views from AONB and on heritage assets.
- Incompatibility with SDC 'Carbon Neutral 2030' target.
- Lack of employment opportunities.
- Presence of significant archaeological remains.

2.42 It was not until April 2021, that SDC produced a further report on the outcomes of the consultation on the Draft Plan⁶ held November 2019 to January 2020 (i.e. 15 months later). Paragraph 3.35 highlights that there were high levels of objection to the new settlement at Wisloe, with 241 of the 279 (86%) respondents objecting. Whilst evident that the overwhelming majority were against the new settlement it is relevant to note that the 14% who supported the new settlement would have included organisations, and thus it is not representative of the level of local support.

2.43 It is also noted that this analysis only applies to the online 'sites' questionnaire responses and no attempt is made to perform a quantitative analysis of the e-mail and letter responses. WAG has undertaken a quantitative analysis of the email and letter responses, which is included with its separate representations. Out of the 592 email and letter responses, only four were found to be in favour of PS37. Of these, three supported all sites in the plan and one (Rep 240), without offering any evidence, specifically supported PS37. The WAG report demonstrates that the support comments are negligible in number but also that the SDC analysis is flawed and seriously underestimates the opposition to PS37, not just by residents of Slimbridge, but throughout the District.

2.44 Paragraph 173 of the SDC Consultation report states '**All comments submitted on sites within the Berkeley (sic) have been read and Section 5 of this report provides a summary of the key points raised and also details a response from the Council highlighting whether the site is considered appropriate for allocation in the Local Plan.**' Within Section 5, Pages 173 to 175, provide SDC's responses to the specific comments made on Wisloe New Settlement (PS37) which are presented separate lists for 'support comments' and 'objection comments'. However, without numerical analysis it is impossible to judge the number of support and objection comments which could easily mislead readers to think both options received similar levels of support, which is clearly not the case.

2.45 SDC's response suggests:

- the wording of the policy and supporting text seeks to address specific concerns raised during consultation; **SPC disagree – the policy fails to**

⁶ Stroud District Local Plan Review: Draft Plan for Consultation November 2019 Consultation Report (April 2021)

acknowledge numerous concerns that were raised including the gas pipeline running through the site, agricultural land quality, air quality and mineral safeguarding constraints.

- this new settlement, developed in accordance with Garden City principles, will contribute to the District's housing and employment needs at a location which maximises the potential for residents to use active travel and public transport to access jobs, services and facilities; **SPC disagree – the new settlement will not meet Garden City principles and is not in a location that maximise the potential for active travel and use of public transport.**
- The site performs relatively well in the Sustainability Appraisal against reasonable alternatives, using a range of sustainability objectives; **SPC disagree – the Sustainability Appraisal is flawed.**
- The Habitats Regulation Assessment has not identified any issues or impacts on biodiversity sites which are not capable of mitigation; **SPC disagree – it is functionally linked land.**
- Whilst there are constraints, including proximity to the M5 motorway and gas mains on-site, these are capable of mitigation through layout and design measures; **SPC disagree – there is no evidence to demonstrate that these can be mitigated without affecting the viability and deliverability of a cohesive new settlement designed in accordance with Garden City principles;**
- Strategic landscaping buffers around the site and a strong design code will prevent physical and visual coalescence with neighbouring villages; **SPC disagree – given the immediate proximity of this site to Cambridge and Slimbridge, a landscape buffer would be insufficient to prevent harm to the legibility/identity of these discrete settlements.**
- The transport assessment work has identified no major issues and opportunities for sustainable transport measures and modest highway mitigation works to address traffic and safety issues; **SPC disagree - it is an unsustainable location which would be wholly reliant on extensive accessibility improvements which have not been demonstrated to be deliverable.**
- The Infrastructure Delivery Plan has identified no major issues which cannot be addressed; **SPC disagree – the IDP fails to give adequate consideration to the cost and delivery implications of key infrastructure.**

- The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation; **SPC disagree – the site is being promoted by the County Council and a charity. There is no developer interest, and there are significant unresolved deliverability and viability issues.**
- The scale of growth required in the District means that a number of strategic sites will be in delivery at the same time. **SPC agree there is a need for strategic sites, but the concentration of such proposals in the Berkeley Cluster will compromise delivery.**

2.46 Section 3 of these representations elaborates on SPC's concerns that are identified above.

2.47 Following the Stage 3 Draft Plan consultation an 'Assessment of Strategic Development Opportunities' was published in May 2020 and its purpose was **"to support the early stages of the plan making process"** (para 1.8) and **'inform the search for suitable strategic development land beyond the existing settlement boundaries in the study area'** (para 1.1). However, it was published 18 months after Wisloe New Settlement was first identified in the Emerging Strategy and 6 months after the publication of the Draft Plan⁷. It therefore cannot have informed the selection of the site.

2.48 MBELC has reviewed this assessment in their Site Appraisal (included at Appendix 1) and comment that the entire district of Stroud was included within the study area and 'potentially developable land' was identified by excluding land which did not meet criteria relating to sustainability, constraints, viability, and size. The remaining land was organised into 'Broad Areas' which were used for a landscape sensitivity assessment (included as part of The Assessment of Strategic Development Opportunities).

2.49 The landscape sensitivity assessment considered the sensitivity of the 'Broad Areas' to residential development (in general) using seven criteria⁸. 'Broad Areas' were then subdivided into 'Assessment Areas', which became the primary units for reaching overall judgements of landscape sensitivity to specific types (scales) of residential

⁷ An Interim Assessment was prepared in October 2019, although the assessment of land within Wisloe New Settlement is omitted from this version.

⁸ The headings of the criteria are: Physical character; Natural character; Historic landscape character; Form, density, identity and setting of existing settlement/ development; Views and visual character including skylines; Access and recreation; Perceptual and experiential qualities

development, specifically: 'small village' (1,500-5,000 dwellings), 'large village' (5,000-10,000 dwellings), 'town/city' (10,000 + dwellings). However, the Assessment Areas were not subject to a finer grain assessment and judgment concerning sensitivity to the different types of development were based on the conclusions reached for the Broad Areas. MBELC highlight that the definition of 1,500-5,000 dwellings as a small village is questionable.

- 2.50** Wisloe New Settlement falls within Broad Area 11 (BA 11) and Assessment Area 49 (AA 49) (New Settlement). BA 11 scored moderately against four sensitivity criteria and moderate-high against three criteria. No finer grained assessment was undertaken for AA 49, despite covering a significantly smaller area than BA 11, and it was not re-assessed against the sensitivity criteria. Overall sensitivity ratings for AA 49 were provided ('moderate' for small village, 'moderate-high' for large village, and 'high' for town/city). MBELC comment that the accompanying text provided in Appendix 2B to the assessment lacks sufficient detail to explain how these judgements were reached.
- 2.51** MBELC also highlight that one of the criteria used to assess the Broad Areas was called '**Form, density, identity and setting of existing settlement/development**' (BA 11 scored moderately against this criterion). An example of how an area might score highly against this criterion was provided in the study which corresponds closely with the situation at Wisloe New Settlement. The example cites an area which forms '**an important part in the perception of a gap between settlements. Development in the assessment area would have a poor relationship with the existing settlement form/pattern**'. Therefore, a criterion which should have been flagged as a significant issue – relating to settlement pattern – was not.
- 2.52** In October 2020, SDC carried out a further **Regulation 18 Consultation (referred to as Stage 4) on 'Additional Housing Options'**. The document identifies that the consultation was undertaken in response to the Government's proposals for a revised standard method which, if confirmed, will see the housing requirement for Stroud District increase from 638 homes per annum to 786 homes per annum. This will mean that the emerging Local Plan may have to identify further land within the District for housing before it can progress through examination.
- 2.53** The consultation paper also explained that SDC is considering identifying additional reserve sites to ensure that the portfolio of sites in the emerging Local Plan guarantees housing at the delivery rates required. The paper highlights that if the Council does not

identify a reserve supply, an undersupply may result from changes in economic cycles and unforeseen issues with respect to the delivery of brownfield sites and the proposed creation of new settlements.

- 2.54** The consultation was therefore undertaken to ensure that the emerging LPR is more robust and can respond to changes in circumstances as it proceeds through the later stages of the Plan making process.
- 2.55** Broadly, the consultation document is broken into two sections; the first section covers analysis of the strategic spatial growth options and the second section covers analysis of recently submitted development site proposals; in particular two new growth points; PGP1 Land at Grove Farm, Whitminster (up to 2,250 dwellings) and PGP2 Broad Location at Moreton Valence/Hardwicke (up to 1,500 dwellings).
- 2.56** Right at the end of the 8-week consultation, the Government withdrew its proposals to increase the housing requirements for Stroud District and reverted to the current standard method requiring 638 homes per annum. Nonetheless, both SPC and WAG continued to submit responses to this consultation (see Appendices 6 and 7), which highlighted in particular how the two new growth points PGP1 and PGP2 were more sustainable, deliverable and viable than Wisloe New Settlement.
- 2.57** SDC ultimately chose to ignore this analysis, stating in the consultation report⁹ that it decided not to take either forward in the LPR Regulation 19 draft as they perform less well than alternatives sites in terms of meeting sustainability appraisal objectives and compatibility with the proposed development strategy. SPC (and WAG) strongly disagree with this assertion and have seen no evidence to support it.
- 2.58** Following the stage 4 consultation, SDC progressed with the preparation of the Regulation 19 LPR. A consultation draft was considered by SDC's Environment Committee at its meeting on 20 April 2021, and at that meeting a report from the Planning Review Panel was presented (see Appendix 8). This advised:
- 'Members of the Planning Review Panel have spent considerable time on the detailed work involved in considering the policies, locations for new housing, availability of services and environmental impact on the District involved in the**

⁹ Stroud District Local Plan Review: Additional Housing Options Consultation Report (April 2021) p. 24

New local Plan. It is, therefore, unfortunate that it has not been possible to achieve unanimous support from the members of the panel.

The Panel, is prepared to accept, reluctantly or otherwise, all the sites proposed in the plan with the exception of the proposal to develop the site known as Wisloe. In the eyes of some, this particular site may present difficulties which would lead to its removal at examination in public. Other members did not share this view. Some investigative work on this site is still being done at the time of writing. However, to progress the new Local Plan as a whole, the Wisloe site has been included in the list of proposed sites to 2040.’ [emphasis added]

2.59 This is a very significant and revealing statement, which highlights the uncertainty that remains within SDC with the Wisloe New Settlement proposals at the eleventh hour in the plan making process¹⁰. Valid concerns and questions that have properly and clearly been raised by consultees, including SPC and WAG, at the Regulation 18 stages (as demonstrated above) remain unaddressed with investigative work **still** being undertaken to support a decision made by SDC back in 2018 to pursue Wisloe.

2.60 An amendment was tabled (quite rightly) at the 20th April 2021 Environment Committee by Cllr Haydn Jones to remove Wisloe New Settlement from the LPR prior to publication. This was narrowly defeated by 6 votes to 5, again demonstrating an ongoing level of concern amongst a significant number of members over the decision to continue to include Wisloe.

Issues with Public Engagement During the Plan Making Stage

2.61 Beyond the general lack of information in SDC consultation reports to issues raised by SPC and WAG in preceding stages of the plan making process, both are concerned with respect to the adequacy and effectiveness of the consultation actually undertaken. The following issues have been highlighted by representatives of SPC and WAG:

- Wales & West Utilities were not consulted until February 2020, after the issue of the high-pressure gas pipeline crossing the site had been raised by WAG. This is

¹⁰ The meeting notes of the Planning Panel Review meeting held on 13th April 2021 have been requested by WAG through a Freedom of Information Request. SDC responded on 13 July 2021 to advise that it has decided not to disclose these as it is the Council’s view that they constitute an internal communication.

despite SDC's Statement of Community Involvement (SCI) highlighting at paragraph 2.5 that electricity and gas operators are specific consultation bodies that the Local Plan Regulations state must be consulted at key stages of plan production.

- SDC has failed to engage proactively with Network Rail throughout the plan making process. It is understood that a risk assessment has not been completed to determine if the safety of the level crossings between Wisloe New Settlement and Cam will be compromised. Any mitigation required to address safety issues is therefore unknown at this stage, including the costs and timescales in implementing this.
- The SCI refers at paragraph 2.11 to a variety of methods to encourage local participation, including conferences or workshops, discussion or focus groups¹¹. SPC and WAG are not aware of any such methods being used in preparing the LPR.
- The lack of engagement with SPC is particularly concerning given that it should be a key stakeholder in the process. The SCI correctly recognises at paragraph 2.8 that **'Town and Parish Councils, as the tier of government that is closest to local communities, have a central role to play in leading their communities and improving local quality of life. Town and Parish Council views are therefore an important consideration.'** SPC has only received the generic notifications on local plan consultations issued by SDC, and no efforts have been made by SDC to engage directly with SPC over Wisloe New Settlement beyond this.
- SDC should have added all those that responded to the Regulation 18 consultation to its database and notified them of the consultation on the Regulation 19 LPR. It failed to do so.

2.62 The above provides no confidence to SPC that there will be genuine community engagement in the masterplan process if Wisloe New Settlement does remain in the LPR.

Failed Garden Communities Bid

¹¹ The SCI was amended in October 2020 to refer to these taking place online to reflect Government guidance on social distancing in response to the Covid-19 pandemic.

- 2.63** Although recognised as being separate to the Plan making process, SPC consider it relevant to highlight that SDC submitted a bid in 2018 for Wisloe New Settlement to join the Government's Garden Communities programme. Documents submitted as part of the bid have been obtained by WAG through a Freedom of Information request to Homes England and are included at Appendix 9. Notably, whilst identifying that the emerging allocation in the LPR comprises 1500 homes, a primary school and 5 hectares of employment space, the bid presents the proposal on page 14 as an augmented settlement of **'5000 homes... 2 new primary schools, a secondary school, and 16ha of employment, vitality and critical mass'**.
- 2.64** On page 19 the bid explains that delivering the larger settlement would mean SDC, GCC and the Ernest Cook Trust need to engage with third party landowners. Despite this, it goes on to suggest that 1,400 homes could be delivered by 2030, 3,500 by 2040 and 5,000 by 2050.
- 2.65** The bid was rejected with the assessment revealing that the proposal received a score of 12 out of 35 for 'deliverability and viability' (i.e. 34%). The assessment commentary reveals that housing delivery starting in 2026 is considered optimistic. It also highlights that **'Further work [is] required on major infrastructure issues in particular. M5 corridor and J13, Cam and Dursley Station and connections to it across the M5.'**
- 2.66** On this point, it is notable that the bid identifies the following in response to a question which seeks clarity on what aspects of the government support package the proposers would like to draw on to support delivery of the new garden community:

'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.**

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. (emphasis added)**

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.'**

2.67 We explore the acoustic bund proposals and transport related infrastructure requirements in Section 3, but it is notable that the proposers were seeking Government support to deliver items critical to support the smaller 1,500 dwelling proposal in the LPR. Such support has not been forthcoming, and as explored further in the following section an alarming level of uncertainty remains over the deliverability of Wisloe New Settlement (as proposed in the LPR).

3 The Proposed Site Allocation

3.1 In this section, expanding on the valid concerns raised with SDC throughout the previous stages of the plan making process, we explore the soundness of SDC's decision to identify Wisloe as a new settlement allocation in the LPR Regulation 19 draft. We open by exploring the Council's expectations or policy requirements for the allocation and then go on to demonstrate through technical evidence and other available information that these aspirations are fundamentally unrealistic and unachievable.

Policy PS37 Requirements

3.2 Draft Policy PS37 opens by identifying that **“land at Wisloe (Slimbridge Parish) is allocated for a new garden community comprising employment, residential, retail, community and open space uses and strategic green infrastructure and landscaping. Development will be an exemplar for achieving carbon neutral development by 2030 and will take place in accordance with Garden City Principles.”** (*emphasis added*)

3.3 The importance of achieving carbon neutral development by 2030 and meeting Garden City Principles is therefore at the front and centre of the policy requirements. It then adds that the expectation of the LPR is that a 'spatial masterplan and implementation plan' will need to be prepared and approved by the District Council and this will detail the way in which the new community, land uses and infrastructure will be developed in an integrated and coordinated manner.

3.4 The detailed policy requirements then follow and include the following:

- Approximately 1,500 dwellings, including 30% affordable dwellings;
- 5 ha of office, B2 and B8 employment land and ancillary employment uses;
- A 3FE primary school (inc. early years provision) and contributions to secondary provision;
- A network of multifunctional Green Infrastructure throughout the development which reflects Building with Nature standards;
- local provision standards to provide for public open space and accessible natural green space;
- tree planting to achieve carbon capture;

- measures to deliver a net gain to local biodiversity;
- onsite and offsite works to mitigate against the identified impacts upon the Severn Estuary SAC/SPA/Ramsar site;
- Onsite community and sports built provision and contributions to offsite indoor sport and leisure facilities;
- A local centre, incorporating local retail, surgery and community uses as required to meet the needs of the development;
- Structural landscape buffers to prevent physical and visual coalescence with neighbouring villages and along boundaries with the M5 and A38, with appropriate noise attenuation measures;
- A positive SuDS strategy;
- Adequate and timely infrastructure to tackle wastewater;
- Zero carbon energy generation to meet the needs of the development;
- A bespoke and innovative layout;
- Ultrafast broadband;
- A layout which prioritises walking and cycling and access to public transport over the use of the private car;
- High quality and accessible walking and cycling routes including the retention and diversion of existing footpaths 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 and Dursley station and to link with the Cam and Dursley Greenway to the south and to NCR 41 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 and Dursley station for sustainable modes and contributions towards the enhancement of passenger facilities;
- Electric vehicle charging points in accordance with local parking standards;
- 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 vehicular 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;
- Any associated infrastructure enhancements required and identified in the Stroud Infrastructure Delivery Plan in this location;
- Phasing arrangements to ensure that employment land is developed and occupied in parallel with housing land completions and retail and community provision is made in a timely manner.

3.5 This is a long list of policy requirements, and understandably so for a new settlement proposal. Yet as we will demonstrate in the following sections, many of these aspirations are unrealistic, unachievable and/or unviable, and if the LPR is to be found sound at Examination the proposed allocation should be deleted. Also, whilst extensive, the list is incomplete and fails to address constraints including the gas pipeline running through the site, agricultural land quality, air quality and safeguarded minerals. These are considered further in the sections below.

Transport

3.6 Enclosed at Appendix 10 is a report prepared by Miles White Transport (MWT), who have been appointed by SPC and WAG to review the transport aspects of the proposals for Wisloe New Settlement. MWT do so with particular regard to paragraph 72 of the NPPF which states:

'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:

a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;

b) 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;

c) 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;

d) 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)' (*emphasis added*)

3.7 Having regard to the above, MWT undertook a detailed review of the policies and objectives of the LPR together with its transport related evidence base, namely the Sustainable Transport Strategy and the Traffic Forecasting Report. It also discusses the transport related policy requirements for the Wisloe site (as listed in paragraph 3.4 above) and the assumptions that have been made by SDC in identifying these requirements.

3.8 MWT highlight that SDC's position is that Wisloe New Settlement 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.

3.9 MWT explain how delivery of the direct pedestrian / cycle link to the Railway Station and the sustainable corridor along the A4135 (both identified as necessary by SDC) 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.

3.10 As noted in Section 2, SDC has failed to engage proactively with Network Rail throughout the plan making process. It is understood that a risk assessment has not been completed to determine if the safety of the level crossings between Wisloe New

Settlement and Cam will be compromised. Any mitigation required to address safety issues is therefore unknown at this stage, including the costs and timescales in implementing this.

- 3.11** There are therefore 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.
- 3.12** MWT identify that SDC has made assumptions for the likely effectiveness of the proposed transport related interventions based on nothing more than the 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 SDC. Without such evidence, MWT advise that the conclusions of the Sustainable Transport Strategy and Traffic Forecasting Report cannot be relied upon.
- 3.13** Considerable doubt has been placed on both the ability to physically deliver the required sustainable travel improvements identified by SDC and their effectiveness should they be delivered. Without the improvements and the high levels of modal shift SDC 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.
- 3.14** In this context, the Wisloe site would be contrary to the NPPF 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. Significantly, it is not a suitable location to support a sustainable community (a prerequisite when planning for new settlements, as identified in paragraph 72).
- 3.15** MWT go on to discuss the alternative locations for development at Whitminster (PGP1) and Moreton Valence / Hardwicke (PGP2) which have been considered but discounted by SDC. MWT identify that 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.

- 3.16** 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 NPPF and indeed the Council's Draft Local Plan.
- 3.17** MWT conclude that, in transport terms, 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 SDC's Climate Emergency agenda.

Agricultural Land Quality

- 3.18** Enclosed at Appendix 11 is a report prepared by WAG which highlights the flawed approach taken during the plan making process to the assessment of the quality of agricultural land within the Wisloe New Settlement allocation.
- 3.19** This statement raises significant concerns with respect to how consultants acting on behalf of the Site Promoters have erroneously downgraded 77 hectares of scarce Grade 2 Best and Most Versatile land (BMV) within Stroud District to Grade 3b (i.e. not BMV). This work¹² has been accepted and published in the LPR evidence base by SDC without proper validation and testing through reference to Natural England, the statutory consultee for such matters. Alarming, this flawed information has been used by SDC as 'evidence' to inform the Sustainability Appraisal and make decisions on site selection.
- 3.20** The statement explains how the Site Promoters ALC consultants, SES, demonstrated a lack of competence in carrying out the flawed survey (and have subsequently been replaced by a different consultant). Concerned by the way in which the survey had been conducted, WAG decided to fund and commission an expert consultant, [REDACTED]

¹² Soil Environmental Services Ltd (September 2019), *AGRICULTURAL LAND CLASSIFICATION*, Ernest Cook Trust and Gloucestershire County Council, Land at the Narles, Slimbridge Estate, Wisloe

██████████ a Chartered Scientist (CSci) and a Fellow (F.I. Soil Sci) of the British Society of Soil Science (BSSS), to prepare an independent review of the proposer's survey and report.

- 3.21** ██████████ report is appended to the note and demonstrates that the 'Fieldwork Results' within the SES report do not provide adequate soil profile data, for example, by not distinguishing 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).
- 3.22** ██████████ 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 should remain classified as **Grade 2**.
- 3.23** ██████████ findings corroborate with local knowledge within the Parish that the Wisloe site provides the best farming land in the local area and produces high quality crop yields. Two long standing tenants farm it.
- 3.24** On 20 February 2021, WAG followed ██████████ recommendation to share his technical review with SDC in order that it 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. 595.
- 3.25** As explained in the WAG report, it was not until 5 weeks later that SDC finally consulted with Natural England and a video call took place on 8 April 2021. Natural England subsequently provided SDC with good practice advice, and it is understood that a different ALC consultant has since been instructed by the Site Promoters to conduct a new survey. This further report has not been made available at the time of drafting these representations, and both WAG and SPC hold significant concerns about the lack of opportunity to scrutinise and comment on such important information through the Regulation 19 Consultation process.

- 3.26** Fundamentally, WAG and SPC consider that in choosing to identify Wisloe as an allocation based on flawed information, planning decisions have been made by SDC that fail to protect and enhance soils and do not recognise the economic and other benefits of the best and most versatile agricultural land. Paragraph 170a) and 170b) of the NPPF have therefore not been complied with.
- 3.27** Further, as discussed in the WAG report, SDC has not properly considered, or attempted to consider, the poorer quality land alternatives to Wisloe through the local plan process. There are alternative strategic size sites which have not been selected which have poorer quality land, for example PGP1 and PGP2. Paragraph 171 of the NPPF has therefore also not been complied with since areas of poorer quality land have not been preferred to those of a higher quality.

Noise and Air Quality

- 3.28** Enclosed at Appendix 12 is a report prepared by Entran Environmental and Transportation Consultants (June 2021) who were commissioned by SPC to undertake a desk-based review of available traffic modelling and air quality monitoring for this area and identify whether the sources of air pollution currently on the site, including the M5 and A38, pose a risk to human health.
- 3.29** Entran's report highlights that the draft LPR does not provide any details to demonstrate that exposure of future occupants to air pollutants arising from these sources has been considered. There is no mention of the need for any set back distances from these roads, or other mitigation requirements for the sensitive uses within the allocated site. The suitability of the site in terms of air quality and human health has therefore not been demonstrated.
- 3.30** Furthermore, the impact of the development itself on air quality has not been considered. The proposed allocation of up to 1500 dwellings and 5 hectares of employment use will likely generate a significant number of daily road vehicle trips (particularly given its inaccessible location to sustainable modes of transport) yet the draft LPR does not consider the impact of the pollutants arising from the additional road traffic on the surrounding communities. Entran consider that the impact of additional road vehicles of such a magnitude within the surrounding small settlements has the potential to be significant.

- 3.31** The allocated site PS24 and committed development Northeast Cam, which are proposed in close proximity to Wisloe New Settlement are also significant sized developments. The cumulative impact of emissions from road vehicle trips generated by these three large developments is likely to be significant and should be assessed cumulatively in order to determine the likely impacts on air quality and ensure the protection of human health.
- 3.32** Entran has also been commissioned to advise with respect to noise. In this case the new settlement Promoters have previously submitted a Noise Assessment, conducted by Acoustic Consultants Ltd (September 2019). The report provided at Appendix 13 presents Entran's review of the ACL report and highlights elements of the assessment which require clarification and could be questioned.
- 3.33** Whilst not a matter discussed in the Entran report, it is not clear what level of mitigation would be required to alleviate the noise from the M5 e.g. a large bund or acoustic barrier fence, and how this would impact on the design of the development in terms of visual impact, layout and space. Such mitigation is not presented in the ACL report although based on the Garden Communities Bid to Homes England (as discussed in Section 2 of these representations) it is understood that the Promoters of Wisloe recognise that some form of acoustic bund next to the motorway is required.
- 3.34** Indeed, information that is available in the evidence base in relation to Site PS24 (North West Cam) on the opposite side of the M5 to Wisloe New Settlement demonstrates that a noise bund is considered essential for that development to take place and this has been considered early in the design process¹³. Similar noise conditions are expected to exist for Wisloe New Settlement yet there appears to be no evidence to demonstrate the necessary space requirements for bund/acoustic barrier, and the associated landscaping impacts, have been considered. This is significant as there are other constraints such as the presence of a no build corridor associated with the high pressure gas pipeline running through the site which could compromise the ability to construct a continuous bund along the M5 boundary. The change in levels associated with the M5 crossing the railway also presents a significant design

¹³ Cam Fields (May 2021) Design and Access Statement
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challenge and raises the question as to how tall the bund will need to be (and how much land will be required) to provide an adequate noise barrier to a raised motorway?

- 3.35** Significant questions remain therefore with respect to the deliverability of Wisloe New Settlement from a noise and air quality perspective.

Flood Risk and Drainage

- 3.36** Enclosed at Appendix 14 is a report on flood risk and drainage issues associated with the Wisloe New Settlement Proposals. It has been prepared by [REDACTED] a local resident in Slimbridge Parish whose property has experienced numerous flooding issues since 1998, and as a result, he has since been working continuously on a constructive basis with the authorities involved to address flooding issues in the Parish. [REDACTED] therefore has learnt a lot from the professionals involved and achieved a very good understanding of local conditions and the prime causes of local surface and river water flooding.
- 3.37** [REDACTED] report highlights how the proposals for Wisloe New Settlement pose an existential flooding threat to the adjoining settlements of Slimbridge and Cambridge. The Strategic Flood Risk Assessment and Site Promoter's appraisal contain serious omissions and errors and leave solutions to guesswork that is without foundation.
- 3.38** With the benefit of invaluable local knowledge, [REDACTED] explains how too much emphasis has been placed on the Flood Risk Zones adjoining the site which only consider river and sea flooding without adequate assessment of the existing drainage threats to the adjoining settlements. In recent years, following repeated surface water flooding events, the drainage authorities have been investing heavily in the Parish to establish why the drainage and sewage systems are still not coping in high groundwater and storm conditions. This work is ongoing and has only been partially effective, yet despite its profile and the potential for the New Settlement proposals to exacerbate the issues, [REDACTED] is alarmed over the lack of consideration given to it in the desk based Strategic Flood Risk Assessment and the Site Promoter's Flood Risk & Surface Water Site Appraisal. The revised figures for the frequency of major storms detailed in the GCC report on the December 2020 floods (see Appendix 15) shows just how inaccurate the proposers' consultant's data is and how that casts the proposed mitigation measures in considerable doubt.

- 3.39** [REDACTED] explains how the Site Promoter's drainage solution fails to consider the high ground water level, which will render the proposed attenuation ponds ineffective and unable to cope during high intensity rainfall events. The proposal to straighten and profile the Lighenbrook is also misguided and combined would only exacerbate the existing drainage and flooding issues in Slimbridge and Cambridge, which are both immediately downstream of the two main waterways flowing through Wisloe.
- 3.40** With respect to national planning policy, and the need in paragraph 157 of the NPPF to apply a sequential, risk-based approach to plan making [REDACTED] highlights that a thorough sequential test using accurate and reliable data would have shown that Wisloe New Settlement was the most at risk of flooding of all the new settlement options considered in the plan preparation stages and should not have been included in the Local Plan for this reason alone.

Ecological Impacts

- 3.41** Enclosed at Appendix 16 is a statement prepared by WAG related to the ecological impacts of Wisloe New Settlement. It explains how the proposed allocation does not conform to the requirements of NPPF paragraphs 170, 171, 174 and 177 or the Government Plan 'A green future: Our 25-year plan to improve the environment 2018'.
- 3.42** It does so with reference to 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, Wisloe New Settlement should be identified and assessed as functionally linked land to the SPA within the HRA of the LPR. This is currently not addressed within the HRA Report dated May 2021.
- 3.43** The WAG Statement also highlights that Wisloe New Settlement adjoins the River Cam at Cambridge, which incorporates a Strategic Nature Area (SNA). The European Eel, a critically endangered species on the global IUCN Red List of Threatened Species and priority species under the UK Post-2010 Biodiversity Framework, is

understood to be using the River Cam following the completion of work in 2014 on two weirs to open up several kilometres to encourage eels (& other fish) to migrate for the first time since the early 1980's. The European otter is also present on the River Cam with sightings recorded in the past year.

- 3.44** Based on Natural England's response to the Regulation 18 consultation, there is evidence to suggest that the River Cam constitutes a Functionally Linked Watercourse. No assessment of the impacts of the new settlement to the SNA or the River Cam has been undertaken however by SDC to understand the effects of the proposal. WAG is of the view that surface water run-off and/or pumped water from attenuation features in the new settlement would have a negative impact.
- 3.45** Given the importance of Functionally Linked Land and the SNA including River Cam, it is unclear why SDC has not referred Wisloe New Settlement to Natural England to undertake an ecological assessment, particularly when two other nearby sites in the Berkeley Cluster have been subject to a high level of appraisal and scrutiny.
- 3.46** The WAG statement also highlights that the promoters of Wisloe New Settlement commissioned an ecological appraisal in August 2019 which identified the potential for many protected species to be using the site and surroundings and recommended follow up protected species surveys. As far as WAG and SPC are aware these have not been undertaken.

Landscape Constraints

- 3.47** Enclosed at Appendix 1 is a report prepared by Michelle Bolger Expert Landscape Consultancy (MBELC) which identifies the main landscape related constraints to the development of Wisloe New Settlement. This appraisal follows the principles for landscape assessment set out in the Landscape Institute's *Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013) (GLVIA3)*.
- 3.48** The appraisal finds that Wisloe New Settlement is constrained by a number of factors (as presented in this representation). 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. The appraisal demonstrates through a series of figures (5 to 7)

how the new settlement, combined with the allocation of “Cam North West” (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, and the adopted Slimbridge Village Design Statement (referred to in paragraphs 2.6 and 2.7 of this representation).

3.49 Given the immediate proximity of existing settlements, it is hard to conceive of a landscape buffer which would be sufficient to prevent harm to the legibility/ identity of Cambridge and Slimbridge as discrete settlements. When travelling from the new settlement to either there would be no sense of having left one settlement and entering another. This is illustrated in MBELC aforementioned figures but also in the addition plan included at Appendix 17, which clearly demonstrates the lack to separation, and the extended urban sprawl that would encompass Wisloe, Cam, Slimbridge and Cambridge.

3.50 MBELC highlight that a technical note prepared in October 2019 by Stantec on behalf to the new settlement promoters inexplicably fails to address the issue of settlement separation and the potential for coalescence.

3.51 MBELC’s appraisal goes on to consider the ability to deliver a new settlement in accordance with ‘Garden City Principles’, which include ease of movement and connectivity. MBELC demonstrates through mapping (Figure 8) how this will be undermined by a number of constraints which impact upon the availability of developable land and fragment the site. These include:

- Gaps in the connectivity of available land, as a result of landowners not promoting land, including White House, and land north of Wisloe Rd.
- Land immediately alongside the M5 and railway which would have limited connectivity with the surrounding landscape and is likely to have poor residential amenity.

- Infrastructure including a high-pressure gas pipeline and the A4135.
- Areas at risk of flooding, including from fluvial and surface water sources.
- Areas with high potential for archaeology.

3.52 MBELC conclude that the constraints presented by the site's location and its role in maintaining separate settlement identities cannot be overcome through design or expensive infrastructure and this significantly undermines its suitability for a new settlement allocation.

Heritage Impacts

3.53 Enclosed at Appendix 18 is a further report prepared by WAG, which explains the inadequate consideration given to the potential for the site to contain assets of archaeological interest. The report discusses available evidence from the variety of expert sources which indicates the likely presence of a substantial Roman settlement stretching from what would have been the banks of the River Severn, across the A38 (a Roman Road) over the Wisloe New Settlement site and reaching into Cam.

3.54 The report highlights how the initial assessment work submitted by the Site Promoters, published in September 2019, does not provide full details of the findings of a site investigation, and plays down those it does report on. Subsequent later discoveries on both sides of Wisloe New Settlement further substantiate the likely presence of an extensive early Roman settlement contemporary to the establishment of Gloucester as a military outpost.

3.55 Despite this being highlighted by SPC and WAG in consultation responses on the Regulation 18 Draft Plan, the Promoters and SDC have deferred further investigation until the planning application stage. The true historical value of the land across which Wisloe New Settlement is proposed therefore remains unknown. There is a strong possibility that the opportunity to further investigate the parish's history in a timely manner will be compromised. Importantly, significant discoveries could undermine the delivery timescales of Wisloe New Settlement and the anticipated quantum and layout of development should remains be identified that must be preserved *in situ*.

- 3.56** With respect to above ground heritage assets, we noted in Section 2 of this representation how a site only 300m to the northwest of the proposed boundary of Wisloe New Settlement has been discounted through the SALA process on heritage grounds. SLI001, on the northern edge of Slimbridge was rejected by SDC due to **“very significant heritage constraints. This is a very historic landscape”**. The SALA Heritage Impact Appraisal (2017) explains further that **“the site’s sensitivity relates to the sense of Slimbridge’s place in the landscape, its character and its historic linear settlement pattern, and the dominance of the church – visually and historically”**.
- 3.57** Inexplicably, the SALA sites which form Wisloe New Settlement were not considered in the Heritage Impact Appraisals. This is despite the Slimbridge Village Design Statement (SVDS) 2017 (which is adopted by SDC) stating that **‘the spire of St Johns Church is a prominent feature within the landscape of Slimbridge as it can be seen from most areas and it is a defining feature of the parish’**.
- 3.58** Views of the Church are considered further in the MBELC Site Appraisal (Appendix 1). This identifies that this important church has been described as **‘Probably the best example in the county of the Early Gothic Style of the C13’¹⁴**. The tall spire is a landmark not just in Slimbridge but across the surrounding vale, footslopes and Cotswold escarpment. Fields within the Wisloe New Settlement site are visible in views towards the church (referred to locally as Slimbridge Spire). Examples include views looking west from Dursley Road, and the PRoW network within and near the southern parts of Wisloe New Settlement. Views towards Slimbridge Spire from Fp 45 south of Wisloe New Settlement are particularly attractive. The spire is seen above the fields (within Wisloe New Settlement), with hedgerows and trees providing an attractive layering beneath the church, and with the hills in the Forest of Dean seen in the distance beyond (see Figure 12 of the Site Appraisal). The character of these views would be altered with the development of the new settlement. In the case of views from Dursley Rd and Fp 45, visibility of the church is likely to be replaced with buildings. Such changes will harm the character and amenity of the local countryside.

¹⁴ Gloucestershire: The Vale and the Forest of Dean (The Buildings of England) David Verey Page 339
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Infrastructure Provision and Viability Considerations

- 3.59** SPC is concerned that SDC may have been unduly influenced in allocating large sites such as Wisloe New Settlement, by the incentive of obtaining grant funding towards new infrastructure provision. As highlighted in Section 2 of this representation, the Garden Communities bid has been unsuccessful and there was an expectation that this Government support would deliver items critical to support the proposed allocation, including the noise bund and sustainable transport infrastructure.
- 3.60** The LPR refers at paragraph 2.3.25 to the need for improvements to existing public transport interchanges and the creation of new interchanges at new growth locations. However, it is not at all evident that SDC can demonstrate how these crucial infrastructure provision improvements will be provided, or who will actually fund them?
- 3.61** Furthermore, SPC strongly disputes the claim made in the LPR at paragraph 2.3.2 that the development of larger housing sites is likely to bring about the provision of a greater number of affordable homes and a greater range of types and tenures than a dispersed option would. It believes that in the case of Wisloe the reverse would actually be true. The very high infrastructure costs associated with the proposed allocation would mean that only a much lower non-policy compliant amount of affordable housing would be able to be provided from the proposed development.
- 3.62** The LPR recognises that the increased levels of growth will put additional pressure on roads, particularly at key network junctions within the District. A Sustainable Transport Strategy has identified the key interventions required to deliver a modal shift to more sustainable forms of travel, by walking, cycling and by public transport. It states that transport modelling work has identified the need for highway improvements at M5 junctions 12, 13 and 14, together with improvements along the A419 and A38 corridors. It specifies that such improvements will be required whatever the pattern of growth envisaged and says that larger sites have more potential to help fund major infrastructure schemes and are more likely to attract public funding¹⁵.
- 3.63** The Stroud Sustainable Transport Strategy identifies the following as being key issues for Wisloe New Settlement¹⁶:

¹⁵ Paragraph 2.3.24, Stroud Local Plan Review 2021

¹⁶ P.28, AECOM Stroud Sustainable Transport Strategy (February 2021)

- The M5 borders the site in a northeast-southwest alignment, which, coupled with the railway line, presents severance issues between the site, Cam & Dursley Station and Cam.
- Lack of existing walking accessibility to nearby town centre / secondary educational facilities in Cam and Dursley.
- Lack of car parking at Cam & Dursley Station, as well as an overall need to improve station facilities and capacity.

3.64 The following sustainability measures have been identified as being required¹⁷:

- Masterplan design to give pedestrians/cyclists highest priority within the proposed development through a comprehensive network of local and strategic footpaths/cycleways that connect to existing facilities on the surrounding highway network.
- Active Travel Links into Draycott Business Park and Draycott Mills - Contributions and support to sustainable transport measures on the A38 and A4135 sustainable transport corridors.
- Pedestrian and cycle crossing on the A4135 for safer access to/ from Cam and Dursley station and Cam local centre.
- Active Travel connections to the Cam and Dursley Greenway.
- Existing footpaths to be retained and/or diverted as necessary.
- Emerging road layout to accommodate a potential bus loop through the site.
- Improvements to bus services, particularly those on the A4135 linking to wider destinations including Gloucester and Stroud.

3.65 The Sustainable Transport Strategy identifies a number of other infrastructure improvements of relevance to Wisloe, some of which are likely to have very significant costs associated to them¹⁸:

- M5 - Junction 12: Creation of a new all-movements grade-separated junction, incorporating two overbridges and signalisation of each approach
- M5 - Junction 13: Signalisation of all approaches to roundabout

¹⁷ P.29, AECOM Stroud Sustainable Transport Strategy (February 2021)

¹⁸ AECOM Stroud Sustainable Transport Strategy – Appendices L-Q (February 2021)

- M5 - Junction 14 Eastern: Creation of a new all-movements grade-separated junction, incorporating two overbridges and signalisation of each approach
- M5 - Junction 14 Western: Creation of a new all-movements grade-separated junction, incorporating two overbridges and signalisation of each approach
- A38 – Junction 23 / A4135: Widening on A38 northbound approach to roundabout.

3.66 The IDP identifies a total of eight pinch-points have been identified in the transport model within the Berkeley Cluster¹⁹:

- A38 / B4066
- A38 / Breadstone
- A38 / B4066 Berkeley Road
- A38 / Stone
- A38 / Alkington Lane
- B4066 / Station Road
- A38 / A4135
- A38 / Wick Road
- B4066 / Alkington Lane

3.67 The IDP states that the A38 / A4135 roundabout at Slimbridge is expected to exceed capacity as a result of the Local Plan Review growth. In both the AM and PM peak, the northbound approach is expected to approach or exceed 100%. The transport model considers highway mitigation in the form of a widened northbound approach on the A38²⁰.

3.68 The IDP states that the proposed developments will add foul flows to wastewater networks that are already constrained in places. Both Severn Trent and Wessex Water have highlighted the sites that they think have the highest risks. Upgrades to local pumping stations and sewage treatment works are likely required to support the sites. Severn Trent have growth schemes planned for Stroud, Stonehouse, Cam and The Gloucester Fringe, however the scheme at Cam does not yet account for the additional flows from the Wisloe New Settlement. Wessex Water also noted that capacity

¹⁹ Paragraph 82, P.19, North Essex Authorities Joint Section 1 Plan Examiner's Report (December 2020)

²⁰ P.27, Infrastructure Delivery Plan (June 2021)

improvements at Sharpness STW sufficient to accommodate the proposed developments may not be possible within their existing environmental constraints. Again, it is recommended that individual developers engage early with Wessex Water and or Severn Trent once a masterplan is developed, to enable them to model their network to fully understand the upgrade requirements²¹.

3.69 SPC considers that the IDP fails to give adequate consideration to the cost and delivery implications of key infrastructure, particularly with regard to water and highways.

Gas Pipeline

3.70 A further infrastructure related concern of SPC that has been inadequately dealt with through the site selection process relates to the existing high pressure gas main which crosses the middle of the Wisloe New Settlement site in a south-west to north-east direction.

3.71 This is a matter that SPC and WAG have consistently raised as an issue throughout the consultation process, and this is elaborated on in a report (at Appendix 19) prepared by [REDACTED] of WAG who has a scientific background and spent his entire career working on military systems for the Ministry of Defence. [REDACTED] report presents the findings of investigations undertaken using the Health and Safety Executive (HSE)²² online services to establish the consultation distance (CD) associated with the pipeline, comprising an inner, middle and outer zone. Within any CD, taking account of the risks, HSE will either 'advise against' or 'not advise against' the granting of planning permission on safety grounds, depending on the sensitivity of the proposed use.

3.72 The distances for each zone either side of the pipeline are:

- a.** Inner zone – 16 metres (32m in total)
- b.** Middle zone – 49 metres (98m in total)
- c.** Outer zone – 70 metres (140m in total)

²¹ P.161, Infrastructure Delivery Plan (June 2021)

²² The Health and Safety Executive (HSE) is responsible for managing population growth close to identified major hazard sites and pipelines to mitigate the consequences of a major accident.

- 3.73** The significant constraints posed by the high-pressure gas main have belatedly been recognised by SDC in the plan making process, and a statement was issued in June 2020²³. This reveals that HSE has advised against granting of planning permission by SDC within the 70m consultation zone either side of the pipeline on the Wisloe site because the **“risk of harm to people at the proposed development site is such that HSE's advice is that there are sufficient reasons on safety grounds, for advising against the granting of planning permission in this case”**.
- 3.74** The SDC report states that it is the responsibility of the site promoters to work with the pipeline operator to accommodate necessary mitigation measures in the detailed design of the development to overcome the HSE advice against development. It suggests that potential mitigation measures or design solutions may include:
- **‘thicker walled sections pipe, or other additional protection, in consultation with the pipeline operator, to minimise the development area impacted by the pipeline;**
 - **re-alignment of the pipeline within proposed highways to avoid built development;**
 - **designing the network of green open space within proposed development to accommodate the pipeline easement and avoid impact on the safe operation of the pipeline.’**
- 3.75** The SDC statement adds that costs associated with any mitigation measures will be explored through the IDP and the impact on deliverability tested through the Council’s viability assessment.
- 3.76** We have reviewed the IDP (2021) and this does little to explore the costs. It simply states on page 153 that **“it is often cost prohibitive for a scheme to divert strategic infrastructure, such as the high-pressure gas main at Hardwicke and Wisloe. Instead, these assets should be retained, and their easements incorporated into the masterplan, utilising this space within the green infrastructure framework for sites.”**

²³ Stroud District Council (June 2020) Gas Pipeline Statement
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- 3.77 Indeed, [REDACTED] in his report highlights that on 4 November 2011 [REDACTED] of NRSWA Ltd reported in a case study that the estimated cost of moving 2km of a similar pipeline at Didcot to be £8 million (£10 million at 2021 prices). This is regarded as a minimum cost and could be considerably higher. It should also be noted that reference to the site allocation boundary that a suitable route for relocation would be difficult to find. Another option would be to replace or reinforce the pipeline. Indicative costs are not available for this option, but [REDACTED] considers these are likely to be similar to the relocation option.
- 3.78 Therefore, it would appear that retaining the pipeline and working the appropriate easement into the masterplan as green infrastructure (as suggested by the IDP) is the only viable option. A statement from the site promoters included in the SDC Gas Pipeline Statement suggests that this is what is intended with the corridor forming **“part of the network of open and green spaces that will help define the development at Wisloe.”**
- 3.79 However, this raises the obvious yet unanswered question of how can a high quality and cohesive new settlement be designed around such fixed parameters? An undeveloped corridor approximately 140m wide and 1,500m long through the centre of a new community does not represent effective use of land nor does it provide an appropriate foundation to achieve a strong sense of place. It would therefore fail to meet the requirements of paragraphs 117 and 127 of the NPPF.
- 3.80 The suggestions that it could offer accessible green open space also fails to consider the HSE guidance which advises against public open space in the inner zone. Without reinforcement of the pipeline, public access would therefore need to be restricted from a 32m corridor running through the centre of the new settlement, which would mean the design requirements highlighted above would be even more unachievable. It is also questionable as to whether surface water attenuation features can be accommodated within the easement, and the implications this will have on delivery.
- 3.81 The horrific consequences of failing to follow the HSE guidance are highlighted in Dr Thombs report with examples referred to of high pressure gas pipeline failures.

Mineral Safeguarding

3.82 A further deliverability issue that has surprisingly not been mentioned at all in the LPR, concerns mineral safeguarding. The entire Wisloe New Settlement site is within a Mineral Safeguarding Area (MSA) identified by the adopted Minerals Local Plan for Gloucestershire (2020). This is a notable constraint which could affect the timing of the development. The mineral safeguarding policies contained within the Adopted Minerals LP require the Local Planning Authority to consider the need for residential development against the need to avoid sterilisation of the underlying mineral. If there is an overriding need, then prior extraction of the mineral should be considered before the residential development is allowed to take place. There is no reference to this constraint in Policy PS37 and its supporting text, therefore it would seem that the Council has failed to take this into account when drafting the plan (even though it was raised in representations submitted at the Regulation 18 stage).

3.83 Furthermore, if prior extraction is required then this could significantly delay the delivery of the development given the size of the potential mineral deposit and the need for backfilling to return the site to its original levels to create a development platform.

Delivery Timescales

3.84 Fundamentally, based on the extensive analysis of evidence set out above, we do not consider Wisloe to be a suitable nor deliverable allocation. That so, in the highly unlikely scenario that the challenges faced can all be addressed through mitigation and the development still be proven to be viable, we consider in this section the potential delivery timescales and contribution that might be made to the overall housing supply in the Plan period.

3.85 The LPR Housing Trajectory identifies the anticipated delivery timescales for the Wisloe New Settlement Allocation as follows in Table 2:

Source of Supply	Projected Delivery				Total Supply
	2020-2025	2025-2030	2030-2035	2035-2040	
Commitments (2019)	3,840	755			4,595
Cam North-West		50	130		180
Cam North-East Extension	200	700			900
South of Hardwicke	166	550	34		750
Hunts Grove Extension	110	112	78		300
Sharpness Docks		500	750	1,150	2,400
Sharpness	100	375	225		700
Stonehouse North-West		600	600	150	1,350
Wisloe	50	565	660	225	1,500
Local Development Sites	116	290	290	289	985
District Total	4,582	4,497	2,767	1,814	13,660
Small Sites Windfall	150	375	375	375	1,275
TOTAL					14,935

Table 2: Strategic Housing Allocations Delivery

3.86 We note that the above table identifies a total housing supply of 14,935 dwellings, this being approximately 19% above the District's housing requirement figure of 12,600 dwellings.

3.87 In reviewing the achievability of the above, we consider it relevant to have regard to the findings of the Lichfield's Report 'Start to Finish' (Second Edition) which was published in February 2020. A copy is included at Appendix 20. The Report presents the findings of a comprehensive review of the speed of delivery on large-scale housing sites. This second edition is an update to the original study completed in 2016, which has been widely regarded as an authoritative evidence base to inform discussions on housing trajectories and land supply at planning appeals, local plan examinations and wider public policy debates.

- 3.88** The updated study expands the sample size with an extra 27 large sites, taking the total to 97 large sites, equivalent to over 195,000 dwellings, and incorporates more recent data to the latest monitoring year (all data was obtained at or before the 1 April 2019).
- 3.89** There are key conclusions from the study which we consider are highly relevant when considering the anticipated delivery timescales for the Wisloe Allocation. These relate to the average lead in time between submission of planning applications and completion of dwellings on large schemes. Assuming a single planning application is made (albeit it is not clear that the promoters control the whole allocation site), at least a 5-year period should be anticipated between validation of the application and the completion of the first dwellings based on Lichfields research.
- 3.90** Assuming the LPR progresses in accordance with the latest Local Development Scheme (October 2020, Update), the following milestones would be expected:
- Submission – Spring 2021
 - Examination Hearings – Autumn 2021
 - Main Modifications – Spring 2022
 - Adoption – Autumn 2022
- 3.91** However, it would appear that the above dates have now slipped by at least 6 months, if not more.
- 3.92** We anticipate that the preparation of the required ‘spatial masterplan and implementation plan’ for the Wisloe New Settlement Allocations appears unlikely to gather momentum until there is some certainty that the submitted LPR is likely to be found sound by the appointed Inspector(s), and particularly as there is currently no developer interest in the site (that would lead this process). This could at the earliest be when the interim findings are published, around Autumn/Winter 2022, assuming the Inspector’s initial assessment of the submitted plan does not raise matters of soundness early in the Examination process. This also assumes that by this point in time a developer(s) can be found to take on the evident technical and financial risks associated with Wisloe and lead the masterplan process. In this respect, SPC note that the more sustainable alternatives to Wisloe PGP1 and PGP2 both have credible masterplans and are supported by developers prepared to make the financial undertakings.

3.93 Given the number of infrastructure related issues to address and the clear lack of testing to date (on the part of a developer), the master-planning process for Wisloe New Settlement is likely to be complex and protracted, requiring input from numerous statutory consultees and infrastructure providers. On this basis, it is reasonable to assume that it could take 12-18 months to complete. Submission of the planning application in late 2023/early 2024 could therefore be expected at the earliest, assuming it is prepared concurrently with the Masterplan.

3.94 Applying Lichfields findings on the average lead in times for housing developments of a similar scale, the earliest housing deliveries may be expected is in late 2028. This means that the 50 dwellings envisaged at Wisloe between 2020-2025 will not be delivered, nor in all likelihood will the vast majority of the 565 dwellings envisaged for delivery at the site between 2025-2030. At best, up to 50 dwellings may be delivered in this period. If prior mineral extraction is required, then housing deliveries may not commence until post 2030.

3.95 In conclusion on this matter, having regard to the above, we consider that the following represents a best-case scenario housing trajectory for the Wisloe allocation (if proven to be viable and deliverable), albeit it could be much slower if the allocation experiences ongoing delivery issues.

Source of Housing Supply	Projected Delivery				
	2020-2025	2025-2030	2030-2035	2035-2040	Total Supply
Wisloe	0	50	500	550	1,100

Table 3: Strategic Housing Allocations Delivery

3.96 Therefore, instead of delivering 1,500 during the Plan Period, ‘real world evidence’ would suggest that the allocation is likely to contribute significantly less than that figure (if it can be demonstrated to be viable and deliverable in the first place).

Inadequacies of the Sustainability Appraisal

- 3.97** Before concluding this Section and in light of the issues raised, SPC consider it relevant to refer to a letter prepared by Clearlead Consulting (see Appendix 21) which reports on its findings in relation to its review of the Sustainability Appraisal that supports the LPR. This letter identifies several issues of non-compliance with the Strategic Environmental Assessment (SEA) Regulations and is therefore also submitted separately by WAG as a specific representation challenging the soundness and legal compliance of the Sustainability Appraisal.
- 3.98** Those matters of relevance as to how Wisloe New Settlement has been scored in the Sustainability Appraisal are summarised below:
- a.** The SA fails to present a comparison of the growth point options considered in the development of the LPR in order for the sustainability performance of all the growth point options to be compared. In the absence of such an exercise, how can alternative growth points PGP1 and PGP2 be discounted for performing less well to Wisloe New Settlement?
 - b.** Picking up on a number of points identified in these representations, Clearlead identify that there does not appear to be evidence that the Wisloe New Settlement is deliverable and viable and therefore they question how can it be identified as a reasonable alternative?
 - c.** Information on the likely significant effects on the environment of Wisloe New Settlement including secondary, cumulative and synergistic effects is lacking in the SA Report (May 2021) and it is therefore not compliant with Schedule 2 of the SEA Regulations in this respect.
 - d.** The SA appears not to have assessed Wisloe New Settlement according to the scope of the SA that has been agreed with consultees. Sub-objectives within the agreed SA Framework relating to noise and coalescence, have not been addressed within the SA of sites. Regulation 12(5) of the SEA Regulations requires the scope and level of detail of the assessment to be consulted on with the statutory consultees. This is therefore a further compliance issue with the SEA Regulations.

- e. Mitigation measures put forward in the SA are not sufficient as they do not address uncertain effects identified. This is therefore a further compliance issue with the SEA Regulations which require “The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme” to be presented (Sch. 2).
- f. The SA is found not to have been based on current knowledge. Clearlead have been referred to Information sources that are described in these representations and these provide a more accurate SA to be undertaken. This is considered to significantly alter the sustainability performance of Wisloe New Settlement, as presented in the table below.

Summary Performance of PS37 in Local Plan SA and Alternative Performance Using Current Knowledge and Addressing Inaccuracies								
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8
PS37 in SA Report (May 2021) includes mitigation	++	++/-	0	0	++	++	-/+?	+/-?
PS37 using current knowledge includes mitigation	++	--?	0	0	-?	++	--?	--

* CE = Potential cumulative effect

Summary Performance of PS37 in Local Plan SA and Alternative Performance Using Current Knowledge and Addressing Inaccuracies									
	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17
PS37 in SA Report (May 2021) includes mitigation	+	++/--	+/--?	+/-	--	+	0	+	++
PS37 using current knowledge includes mitigation	--?	-- CE*	+/--?	--? CE*	--	+	0	+	++

* CE = Potential cumulative effect

Table 4: Summary Performance of Wisloe New Settlement in SA and Alternative Performance using current knowledge and addressing inaccuracies

3.99 Therefore, using current knowledge, Wisloe New Settlement does not perform as well as the findings of the SA has recorded and appears to be a much less sustainable option than the SA would suggest.

Achieving carbon neutral development by 2030 and meeting Garden City Principles?

3.100As noted at the beginning of this section, the importance of achieving carbon neutral development by 2030 and meeting ‘Garden City Principles’ is at the front and centre of **jib** planning associates representations

the policy requirements for Wisloe New Settlement. We conclude this section by reviewing how realistic it is for Wisloe, which is only expected to function as a Tier 3a ‘Accessible Settlement with Local Facilities’ once complete, to achieve such high standards.

3.101 On Page 31 of the LPR, ‘Garden City Principles’ as defined by the Town and Country Planning Association are helpfully provided. It states **‘A Garden City is a holistically planned new settlement which enhances the natural environment and offers high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities. The Garden City Principles are an indivisible and interlocking framework for their delivery’**.

3.102 The extent to which Wisloe New Settlement will meet Garden City Principles is considered below:

Garden City Principle	Achieved by Wisloe New Settlement?
1. Land value capture for the benefit of the community	There is no reference to this in draft Policy PS37, and it is unclear how this would be achieved at Wisloe.
2. Strong vision, leadership and community engagement	This has been notably lacking in the LPR plan making stages, and SPC has no confidence that this will change in the future.
3. Community ownership of land and long-term stewardship of assets.	There is no reference to this in draft Policy PS37, and it is unclear how this would be achieved at Wisloe.
4. Mixed-tenure homes and housing types that are genuinely affordable	There is insufficient evidence to demonstrate a policy compliant amount of affordable housing can be achieved at Wisloe, noting the high infrastructure costs associated with the proposed allocation.
5. A wide range of local jobs in the Garden City within easy commuting distance of homes	5ha of office, B2 and B8 employment land at Wisloe is unlikely to achieve a wide range of local jobs. Its location alongside the A38 will favour haulage and distribution type uses that have low employment density ratios. A Tier 3a village with relatively few services and poor links

	to public transport will not attract a diverse range of businesses.
6. Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food	Whilst Grade 2 agricultural land does offer opportunities for food growing, as a scarce resource in the District it should be preserved and used more sustainably to benefit a larger population than the few residents in a new village who choose to have an allotment.
7. Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience	The approach to green infrastructure provision would be dictated by site constraints (notably the gas pipeline) rather than best practice design objectives. Developing functionally linked land to the SPA would not enhance the natural environment, and there is no evidence to demonstrate a net biodiversity gain can be achieved, and that the use of zero carbon technology is viable.
8. Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods.	A development of 1,500 dwellings will not provide the footfall to sustain strong cultural, recreational and shopping facilities. Anything more than a small convenience store is considered extremely unlikely. Residents will be reliant on travel offsite to services in higher order settlements that are beyond reasonable walking distance.
9. Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.	For the reasons explained in the Miles White Transport (MWT) report at Appendix 10, there is considerable doubt over the ability to physically deliver the required sustainable travel improvements identified by Policy PS37 and their effectiveness should they be delivered. Without the improvements and the high levels of modal shift SDS assume they will deliver, the development would clearly be in an unsustainable location that would be reliant on the use of the private car.

3.103 It is notable that the GFirstLEP raised concerns on the Regulation 18 Draft Local Plan with respect to Wisloe New Settlement’s compatibility with garden city principles (see Appendix 22). At page 5 they state, **“we note that the proposed site has few definable boundaries, save for the M5 and A38, and there is a danger that the overall garden village principles will be lost with the development simply becoming an urban extension to Cam that will engulf both Cambridge and Slimbridge.”**

3.104 Expanding on principle 7, draft Policy DCP1 sets out how Stroud District will become Carbon Neutral by 2030 ahead of the Government target of Net Zero Carbon 2050. The extent to which Wisloe New Settlement can meet the requirements of this draft Policy as considered below:

Policy DCP1 Requirement	Achieved by Wisloe New Settlement?
Located where the form and mix of development itself or proximity to essential services and facilities minimises the need to travel.	As noted above, the size and location of the development will result in a car dependent settlement.
Designed to discourage the use of the private car, irrespective of fuel source, by prioritising in order of importance: walking, cycling and public transport to deliver the highest possible share of trips by the most sustainable travel modes.	As noted above, there is considerable doubt over the ability to physically deliver the required sustainable travel improvements identified by Policy PS37 and their effectiveness in achieving a modal shift should they be delivered.
Designed to maximise green infrastructure to sequester carbon, achieve nature recovery and to support local food production.	The approach to green infrastructure provision would be dictated by site constraints (notably the gas pipeline) rather than design approaches to sequester carbon. As noted above, Grade 2 agricultural land should be retained to support food production on a wider scale.

<p>Designed to follow the Energy Hierarchy principle of reducing energy demand, supplying energy efficiently / cleanly and using onsite low or zero carbon energy generation to meet standards which move progressively towards zero carbon, in terms both of regulated and unregulated emissions. Accordingly, new development should be constructed to achieve the highest viable energy efficiency and designed to maximise the delivery of decentralised renewable or low-carbon energy generation.</p>	<p>There is no evidence to demonstrate that the development can achieve net zero carbon by 2030. Such an ambitious target will require significant upfront investment in renewable energy production at a strategic scale. There is considerable uncertainty that this would be achieved at Wisloe given the lack of developer involvement and the absence of a renewable energy strategy, including an assessment of the land and infrastructure requirements for renewable energy production to meet the needs generated by the developer.</p>
<p>Designed to reduce waste in accordance with the principles of the waste hierarchy and to promote a circular economy.</p>	<p>There is no evidence to demonstrate how Wisloe would promote a 'circular economy'.</p>
<p>Designed to reduce vulnerability to and provide resilience from the impacts arising from a changing climate, for example by locating and designing development to reduce the risk of flooding and to establish coherent and resilient ecological networks, whilst not increasing the potential for increased greenhouse gas emissions in doing so.</p>	<p>Concerns have been raised in these representations that the new settlement would only exacerbate existing flood issues. Developing functionally linked land to the SPA will harm existing ecological networks and a car dependent development has significant potential to increase greenhouse gas emissions.</p>

3.105 In summary, it is clear from the above analysis that the laudable objectives of the LPR to achieve carbon neutral development by 2030 and in accordance with Garden City



Principles are simply unachievable or at best uncertain in the case of Wisloe New Settlement.

4 Overall Housing Supply

Housing Delivery

- 4.1 The latest Housing Delivery Test results published in January 2021 show that recent housing delivery within Stroud has been very strong with the Authority’s test result measurement being 130% of its housing requirement:

Number of Homes Required			
2017-18	2018-19	2019-20	Total Number of Homes Required
458	458	419	1,335

Number of Homes Delivered			
2017-18	2018-19	2019-20	Total Number of Homes Delivered
501	566	666	1,734

Table 5: Housing Delivery Test 2020 Measurement (MHCLG) – January 2021

Housing Requirement

- 4.2 The LPR identifies that under the Government’s standard methodology the housing requirement for the Plan period up to 2040 is 630 new homes per year. This being a 40% increase from the figure in the 2015 Local Plan of 456 dwellings per annum (dpa). However, data in respect of the most recent monitoring year (2019/20) identifies that 662 new homes were built in the District²⁴.

²⁴ Paragraph 2.5.2, Stroud Local Plan Review 2021

Calculating the Residual Housing Requirement to 2040			
Supply	A	Large Sites Commitments, at April 2020 (on sites with permission / under construction)	4,606
	B	Small Sites Commitments, at April 2019 (on sites with permission / under construction)	525
	C	Other Firm Commitments, at April 2019 (on sites subject to resolutions to grant permission)	84
	D	Total Commitments (= A+B+C)	5,215
	E	Commitments (D) minus undeliverable sites	4,595
Requirement	F	Housing Needs 1 April 2020 to 31 March 2040	12,600
	G	Minimum Residual Housing Requirement to 2040 (=F-E)	8,005
		Allocated Sites in Local Plan	9,065
		Small sites allowance (75 pa x 17 years)	1,275
		Total Housing Supply in Local Plan	10,340

Table 6: Housing Requirements to 2040²⁵

4.3 The housing supply identified within Table 6 includes data on Large Site Commitments up to 2020, but for Small Site Commitments and Other Firm Commitments the data is identified as relating to the period up to 2019. This appears to be an error, as the figures shown match those set out in Stroud District Housing Land Availability – Residential Commitments at 1 April 2020.

²⁵ Table 2, P.33, Stroud Local Plan Review 2021

- 4.4** In terms of total commitments, Table 6 identifies an initial figure of 5,215 dwellings, which has then been reduced to 4,595 dwellings to take account of undeliverable sites. It is not evident what the precise reasons are for this 12% reduction in the Commitments figure or why such a significant proportion of the identified supply is now deemed to be undeliverable. SDC needs to provide a detailed explanation to justify the reduction.
- 4.5** SDC should ensure that its identified housing supply is properly up-to-date and fully reflective of all known housing supply components in order that it is accurate. For instance, we are aware that in respect of Rural Exceptions Housing Sites, planning permission was previously granted for 12 affordable and 12 market properties granted as a Rural Exception site at Land at Northfield, Dursley Road, Cambridge, Gloucestershire (S.13/0123/FUL). Therefore, where there is evidence of past delivery from particular sources of housing supply such as this, over a number of years, SDC should include an appropriate windfall allowance contribution figure.
- 4.6** Consequently, we consider that the windfall supply figure needs to be amended to include an allowance for future contributions from Rural Exception housing sites across the District. Similarly, many Local Plans include specific allowances for future supply from agricultural and rural buildings and from business unit conversions (permitted developments of former offices). The windfall allowance needs to ensure that it makes provision for all appropriate categories of windfall development which can realistically be expected to come forward, taking account of past performance in delivery.
- 4.7** We note that the Stroud Five Year Housing Land Supply (October 2020) identifies that historic evidence demonstrates that small site windfall deliveries have averaged 75 dwellings per annum²⁶.
- 4.8** It is evident that the identified level of housing supply of 10,340 dwellings as set out in Table 6, represents a 29% over-supply in relation to the minimum residual housing requirement of 8,005 dwellings. There is no clear explanation as to why such a deviation from its annual housing requirement is appropriate, particularly given that housing delivery in respect of the most recently available monitoring year exceeded the Council's standard methodology requirement figure of 630 dpa.

²⁶ Para 2.5 Stroud Five Year Housing Land Supply (October 2020)

4.9 The LPR is clearly placing considerably greater reliance on greenfield provision than has previously been the case in terms of the current Local Plan. SPC is concerned that insufficient consideration is being given to brownfield sites. The Stroud District Housing Land Availability – Residential Commitments at 1 April 2020 document identifies a current total capacity of 470 dwellings on the Brownfield Register granted planning permission since 1 October 2017²⁷. This being a significant increase from the 162 dwelling brownfield supply identified in the previous year’s monitoring report²⁸.

The Housing Supply Pipeline

4.10 Paragraph 60 of the NPPF states that in order **‘to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.’**

4.11 Opinion Research Services (ORS) has produced the Gloucestershire Local Housing Needs Assessment 2019 – Final Report and Summary. This was published in September 2020 and forms part of the LPR Evidence Base. In respect of Stroud, Figure 91 ‘Overall Need for Housing’ identifies a need for 12,426 dwellings (621 dpa) over the period 2021-2041. Consequently, it is not evident as to why SDC is seeking to identify a housing supply in significant excess of its housing requirement figure.

4.12 The LPR does not appear to comply with Paragraph 65 of the NPPF, which specifies that **‘strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations’.**

²⁷ P.12, Stroud District Housing Land Availability – Residential Commitments at 1 April 2020

²⁸ P.11, Stroud District Housing Land Availability – Residential Commitments at 1 April 2019

- 4.13** There are a significant number of both made and emerging Neighbourhood Plans in Stroud District. In the case of Slimbridge, it was designated as a Neighbourhood Area in July 2020.
- 4.14** SPC considers that the failure of SDC to have regard to the contribution that Neighbourhood Plans could make in helping to meet the District's housing supply is a significant omission.
- 4.15** Furthermore, the LPR identifies that a new allocation of at least 3,000 dwellings might potentially come forward on Safeguarded Land at Whaddon in order to address the future housing needs of the wider Housing Market Area and, in particular, Gloucester City. Whilst fully recognising that this additional provision would not count towards SDC's own housing supply, nevertheless, it would potentially result in a 66% surplus being delivered in Stroud District in relation to its own identified residual housing requirement figure.
- 4.16** The LPR states that housing and employment growth will be centred at two new settlements at Sharpness and at Wisloe within the Severn Vale (Rail /A38/M5 corridor), where there is the **potential** (*emphasis added*) to create new sustainable communities along garden village principles²⁹. We strongly believe that in reality the evidence set out within these representations in Section 3 demonstrates that development at Wisloe would fail to deliver a new sustainable community that would adhere to garden village principles.
- 4.17** Similarly, it states that at Wisloe (south of Cambridge and Slimbridge) the strategy envisages: delivery of a new garden village community incorporating housing, employment, shopping, community and open space uses, with the **opportunity** (*emphasis added*) to improve access to Cam & Dursley rail station and to local facilities for existing residents and businesses whilst protecting the setting of existing villages³⁰. Again, SDC fails to demonstrate that development at Wisloe would actually deliver key infrastructure such as motorway bridges or tunnel connections to the railway station, which are likely to be highly expensive. Instead, they seem to be mere aspirations.
- 4.18** The LPR acknowledges that delivering the growth expected by central Government within the next 20-year time horizon will be challenging. It states that the strategy

²⁹ Paragraph 2.3.7, Stroud Local Plan Review 2021

³⁰ Paragraph 2.3.20, Stroud Local Plan Review 2021

demands a sustained increase in house building rates beyond levels achieved in recent memory. It specifies that the strategy includes supply from a range of small, medium, large and very large sites at a number of different locations, which together provide opportunities for all levels of the market to deliver. It goes on to acknowledge that delivery rates are vulnerable to changes in economic cycles, brownfield sites can be complex and expensive to develop, and the creation of new settlements is an ambitious undertaking. Consequently, SDC says that the development strategy includes additional housing and employment provision above minimum requirements, to ensure that local needs can be met³¹.

4.19 SPC disputes the above inference that the housing supply is being widely dispersed across the District. It is evident from an analysis of Table 7 that this is not the case:

Strategic Sites	No. of Dwellings
Cam North-West	900
Cam North-East Extension	180
South of Hardwicke	1,350
Hunts Grove Extension	750
Sharpness Docks	300
Sharpness	2,400 (5,000 by 2050)
Stonehouse North-West	700
Wisloe	1,500
Local Sites at Smaller Settlements	985 (cumulative)
Total	9,065

Table 7: Distribution of Housing Across Stroud District

4.20 The above table identifies that Strategic Sites will deliver a total of 8,080 dwellings. However, over half of the total housing supply will be delivered on sites located within the Berkeley Cluster (4,200 dwellings) This particular Cluster will deliver dwellings at Wisloe (1,500), Sharpness Garden Village (2,400) and Sharpness Docks (300).

³¹ Paragraph 2.3.23, Stroud Local Plan Review 2021

- 4.21** 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.

Relevant Local Plan Examination Inspector's Reports

- 4.22** We consider that there are a number of parallels with regard to the proposed Wisloe Garden Village and the Garden Communities (GC's) proposed by Uttlesford District Council, Hart District Council and the North Essex Authorities (Braintree, Colchester and Tendring Councils), Accordingly, we highlight below relevant extracts from the relevant Local Plan Examination Inspector's reports.

a) Withdrawn Uttlesford Local Plan

- 4.23** The Uttlesford Local Plan Examination Inspectors' Report was issued on 10 January 2020 (see Appendix 23). The Joint Inspectors were not persuaded that there is sufficient evidence to demonstrate that the Garden Communities (GC), and thus the overall spatial strategy, have been justified³².
- 4.24** The Uttlesford Joint Inspectors (UJIs) were concerned about the lack of evidence before them to enable them to conclude the GC parts of the Plan were sound. Whilst they recognised that it was Uttlesford District Council's (UDC) intention to lay down much of the detail of the proposed GCs in further Development Plan Documents (DPDs), following the adoption of the Plan, they stated that it was this Examination which must determine whether the GC proposals are properly justified and realistically developable³³.
- 4.25** The UJIs agreed that GC principles should be key pillars in the development of the GCs in Uttlesford. However, they considered that the mechanisms by which these guiding principles would be delivered and ensured were not readily evident in the Plan³⁴. We consider that the same criticisms are applicable to the Wisloe Garden Village proposal in relation to the LPR.

³² Paragraph 2, P.1, Uttlesford Local Plan Examination Inspectors' Report (January 2020)

³³ Paragraph 8, P.2, Uttlesford Local Plan Examination Inspectors' Report (January 2020)

³⁴ Paragraph 12, P.3, Uttlesford Local Plan Examination Inspectors' Report (January 2020)

- 4.26** Reference was made by the UJIs to the development and timing in relation to the delivery of three GC sites in one essentially rural district as being highly aspirational and ambitious. As such, they considered that it was vital that the GCs were justified and deliverable. They pointed out that the NPPF indicates that **‘Local Plans should be aspirational but realistic’** (paragraph 154) and one of the key tests of soundness is that the Plan should be ‘effective’³⁵. The UJIs expressed concerns that the spatial strategy would see three GCs delivering dwellings during a similar timeframe and so competing for house sales³⁶. We have outlined similar concerns with regard to Wisloe and the high concentration of new allocations within the Berkeley Cluster and its immediate neighbouring community in Cam.
- 4.27** The UJIs stated that they strongly believed that the GCs would not deliver the quantum of housing in the Plan period that the Council’s housing trajectory showed³⁷. We have outlined similar concerns with the housing trajectory for Wisloe in Section 3 of these representations.
- 4.28** Whilst appreciating the difficulties of providing a full Rapid Transit System (RTS) service from the outset, the UJIs were of the view that the lack of a RTS until towards the end of the Plan period would mean the modal shifts anticipated would not be realised. Moreover, the use of less sustainable modes of travel could have become engrained in the habits of residents living in the homes built within the early phases of the GCs³⁸. SPC considers that similar dangers exist in relation to sustainable transport provision at Wisloe.
- 4.29** SPC consider that the UJIs finding that there was a lack of clarity about what the various planned sustainable transport upgrades to be particularly pertinent in a Wisloe context. They considered that until the cost of this was known and built into a robust viability assessment, the viability of the GCs was an unknown. Overall, the lack of evidence in relation to transport and infrastructure reinforced their concern that the GC policies were not justified and effective³⁹.
- 4.30** In terms of viability, the UJIs highlighted that the NPPF advises at paragraph 173 that **‘pursuing sustainable development requires careful attention to viability and**

³⁵ Paragraph 19, P.4, Uttlesford Local Plan Examination Inspectors’ Report (January 2020)

³⁶ Paragraph 65, P.12, Uttlesford Local Plan Examination Inspectors’ Report (January 2020)

³⁷ Paragraph 27, P.6, Uttlesford Local Plan Examination Inspectors’ Report (January 2020)

³⁸ Paragraph 44, P.9, Uttlesford Local Plan Examination Inspectors’ Report (January 2020)

³⁹ Paragraph 60, P.11, Uttlesford Local Plan Examination Inspectors’ Report (January 2020)

costs in plan making... and states that **'plans should be deliverable'**. The Viability Assessment was undertaken prior to the most up to date IDP and the revised housing trajectory. Moreover, the Inspectors considered that there were a number of 'big ticket' items in the IDP, some of which would require funding and construction up-front before any returns on the development would be seen. In addition, the IDP had many infrastructure items that had no known costs⁴⁰. SPC believes that the absence of any clear costs or timescales in the Stroud LPR or IDP in respect of major infrastructure costs for Wisloe is serious omission.

- 4.31** The UJIs referred to the importance of Appendix B to *Viability Testing Local Plans – Advice for planning practitioners (June 2012)*, which advises in relation to costs of promoting schemes and associated fees that on large scale schemes care needs to be taken not to underestimate these. It suggests that fees relating to design, planning and other professional fees can range from 8-10% for straightforward sites to 20% for the most complex. The UJI's pointed out that the Council's VA allowed for a higher percentage (12%) on the smallest of sites (10 units or less), but only 6% for the Garden Community sites. They considered this figure to be far too low, particularly as these sites are likely to be more complex than straightforward⁴¹.
- 4.32** SPC notes that Stroud's Viability Assessment assumes that professional fees amount to 8% of build costs⁴². It considers that this figure is too low for a complex Garden Village such as Wisloe.
- 4.33** The UJIs commented upon the presence of an underground high-pressure gas pipeline crossing the Easton Park GC site which had recently come to light. However, it had not been established what implications arose from the pipeline and its associated easements/restrictions in terms of the masterplan for Easton Park including any effect that it might have on the capacity of the site to accommodate development. The UJIs stated that this work would need to be undertaken⁴³.
- 4.34** SPC strongly believes that very similar issues arise at Wisloe given the presence of its own underground high-pressure gas pipeline. As detailed in Section 3, it considers that this represents a significant constraint upon development, particularly given its alignment through the middle of the draft allocation. It does not consider that SDC

⁴⁰ Paragraph 61, P.12, Uttlesford Local Plan Examination Inspectors' Report (January 2020)

⁴¹ Paragraph 63, P.12, Uttlesford Local Plan Examination Inspectors' Report (January 2020)

⁴² Paragraph 7.33, Stroud Local Plan Viability Assessment Working Draft – May 2021

⁴³ Paragraph 104, P.19, Uttlesford Local Plan Examination Inspectors' Report (January 2020)

has had adequate regard to the significant implications of the presence of the pipeline upon the ability to deliver sustainable development and upon the overall viability of the site.

4.35 We consider that the following conclusions of the UJIs to also be relevant in relation to the Wisloe scheme given the similarities between it and the three Uttlesford GCs that were found to be unsound: ⁴⁴

- a. The lack of clear mechanisms to ensure the GC Principles will be met;
- b. The proposed housing delivery trajectory is overly optimistic;
- c. As part of the assessment of reasonable alternatives the SA does not consider a smaller number of garden communities, in combination with more housing in existing sustainable settlements, nor does it have regard to the evidence in the HIA;
- d. The lack of certainty about the delivery of employment uses undermines the potential for the GCs to be sustainable places;
- e. Realistic infrastructure costs have not been established meaning it is uncertain whether the GCs will be viable and developable;

4.36 As a consequence, Uttlesford District Council decided at an Extraordinary Council Meeting on 30 April 2020 to withdraw its Draft Local Plan. Work has since commenced on a new Local Plan.

b) Hart Local Plan

4.37 The Hart Local Plan Examination Inspectors' Report was issued on 10 February 2020 (see Appendix 24). The Hart Draft Local Plan housing requirement of 388 dpa, was based on the then proposed Government standard methodology for calculating local housing need, with an uplift applied. The 'cap' in the methodology was removed and then an uplift of 25% was applied as a contingency in case of a change in methodology or alterations to data, such as new household projections or affordability ratios. Reference was also made to the benefits of boosting the supply of housing, including the delivery of affordable units. The Hart Examination Inspector (HEI) concluded that there was no support in national policy for the amended standard methodology calculation undertaken by the Council. Furthermore, the

⁴⁴ Paragraph 113, P.20, Uttlesford Local Plan Examination Inspectors' Report (January 2020)

Council had provided little substantive evidence to justify an uplift of 25% in preference of any other figure⁴⁵. The HEI recommended Main Modifications (which Hart District Council supported) which resulted in an increase in Hart's housing requirement to 423 dpa. This was in order to make provision for unmet housing need from Surrey Heath District (41 dpa between 2014-2032).

- 4.38** SPC considers that there are strong parallels between the approaches taken by the Hart and Stroud Draft Local Plans in terms of over-provision of housing. Indeed, the Stroud Draft Local Plan's housing over-supply of 29% is greater than the 25% increase that Hart District was seeking to make to its housing requirement figure.
- 4.39** The HEI referred to the Hart Local Plan's strategy, which set out the Council's commitment to preparing a New Settlement Development Plan Document (DPD) after the adoption of the Plan. Policy SS3 and its supporting text identified an Area of Search (AoS) at Murrell Green / Winchfield for the delivery of up to 5,000 dwellings through the production of a New Settlement DPD. The Plan stated that it was not required in this Plan period to meet identified housing needs. Despite this, the Council anticipated that some 1,500 homes from the proposed new settlement would be expected to be delivered within the Plan period⁴⁶.
- 4.40** Consequently, SPC considers that just as in the case with Hart District, the proposed new settlement at Wisloe is simply not needed for the District Council in order for it to meet its overall housing requirement figure. Indeed, a new settlement at Wisloe could undermine other current and proposed housing allocations that are located in close proximity to the new settlement.
- 4.41** The HEI pointed out that the Sustainability Appraisal (SA) accompanying the pre-submission Regulation 19 consultation on the Plan did not test reasonable alternatives to a new settlement and it was considered as a 'constant' as part of all reasonable alternatives that were appraised. On this basis, he was not of the view that the pre-submission SA, in its own right, appropriately or robustly considered reasonable alternatives to a new settlement as a long-term growth strategy⁴⁷. Accordingly, the HEI recommended Main Modifications to the Plan that removed the proposed new settlement. These were accepted by Hart District Council, and the new

⁴⁵ Paragraphs 17-18, P.7, Hart Local Plan Examination Inspectors' Report (February 2020)

⁴⁶ Paragraph 55, P.14, Hart Local Plan Examination Inspectors' Report (February 2020)

⁴⁷ Paragraph 58, P.15, Hart Local Plan Examination Inspectors' Report (February 2020)

Local Plan was subsequently adopted in April 2020 (minus the proposed new settlement at Winchfield).

- 4.42** We consider that the HEI's conclusion that there was little evidence to demonstrate that a site could actually be delivered in terms of infrastructure, viability and landownership within the identified Area of Search to be highly relevant in the context of the Wisloe scheme. The HEI pointed out that Hart District Council's Infrastructure Delivery Plan (IDP) did not include any consideration of the proposed new settlement other than a brief mention of the potential secondary school and the viability assessment has not directly considered a proposed new settlement in the AoS. Again, whilst there was some information from the site promoters in relation to such matters, it was not of any great substance⁴⁸.
- 4.43** The absence of appropriate technical work to justify the proposed Wisloe allocation is a significant concern of SPC. It considers that the information provided so far to be inadequate. It fails to sufficiently address important matters such as the existence of the underground gas pipeline, extensive drainage and acoustic solution requirements, road bridges, road widening, junction upgrades etc.
- 4.44** Furthermore, most of the technical evidence that has been made available by the site promoters is approximately two years old. Consequently, it is apparent that there has been a distinct lack of progress and momentum in terms of undertaking the technical work required to support and justify the draft housing allocation. As a result, we believe that there is little evidence available to demonstrate that the site is actually deliverable.
- 4.45** The HEI referred to evidence being provided at the Hart LP Examination Hearing Sessions that showed a significant parcel of land cutting across the middle of the AoS that was not either in the ownership of the site promoters or land that was available to them. Consequently, there was some doubt, whether a comprehensive and inclusive new community could be delivered as required by Policy SS3 and its supporting text. Given all of this, the HEI was not sufficiently content based on the evidence available to the Examination that Policy SS3 was deliverable and was therefore not effective⁴⁹.

⁴⁸ Paragraph 63, P.16, Hart Local Plan Examination Inspectors' Report (February 2020)

⁴⁹ Paragraph 64, P.16, Hart Local Plan Examination Inspectors' Report (February 2020)

- 4.46** It is the view of SPC that very similar concerns exist in relation to Wisloe with regard to its deliverability given the presence of the high-pressure gas pipeline through the central part of the site, and the effects of requiring a significant easement above it where housing development and drainage infrastructure would be prevented. Thus, making the creation of a cohesive and sustainable Garden Village development far more difficult and problematic.
- 4.47** Hart District Council decided to remove the proposed new settlement in order that its Plan could be found sound and adopted. SPC believes that SDC needs to take the same action in respect of Wisloe in order to make the Draft LPR capable of being found sound.

c) North Essex Authorities Joint Spatial Plan

- 4.48** The North Essex Joint Spatial Plan Examination Inspectors' Report was issued on 10 December 2020 (see Appendix 25).
- 4.49** The North Essex Inspector concluded that neither Route 3 nor Route 4 of the proposed rapid transit system for North Essex has been shown to be deliverable. Because of this, it has not been shown that the necessary public transport connections were capable of being provided from either the proposed West of Braintree GC (which would depend on Route 3 for public transport links to destinations outside the GC, and on Route 4 for links to places east of Braintree), or from the proposed Colchester / Braintree Borders GC (which would depend on Route 4 for public transport links westwards to Braintree). The Inspector found that the lack of necessary public transport connections would directly conflict with the NPPF's advice that the transport system needs to be balanced in favour of sustainable transport modes⁵⁰. SPC considers that the LPR is similarly lacking in demonstrating that sustainable transport modes will actually be delivered as part of the Wisloe scheme.
- 4.50** The NEI stated that in order to secure sustainable development in accordance with national policy, it is necessary for the Plan to set clear strategic guidance on infrastructure requirements for the GC and on the timing and funding of their provision. As submitted, the Plan provides insufficient guidance on these matters and

⁵⁰ Paragraph 82, P.19, North Essex Authorities Joint Section 1 Plan Examiner's Report (December 2020)

is therefore ineffective⁵¹. Again, we consider that the Stroud LPR is lacking in terms of the actual site-specific infrastructure required to deliver the Garden Village. Instead, the IDP is overly focused on general infrastructure requirements such as particular types of education and healthcare provision, rather than clearly identifying and costing site-specific infrastructure requirements such as the noise bund, highway widening and junction upgrades.

- 4.51** Due to the central importance of transport infrastructure to the sustainability of the GC, Main Modifications were made to the North Essex Joint Plan to make it clear that planning permission for development would not be granted until planning consent and funding approval have been secured for the new link road and rapid transit system serving the GC, and that sustainable transport measures will be provided from first occupation of the GC⁵². Wisloe is similarly lacking any such guarantees in the LPR.
- 4.52** The NEI placed great weight on the fact that the GC policies sought 30% affordable housing as part of the overall housing provision in each GC. Achieving that proportion being necessary both to meet the demonstrated need for affordable housing in the Plan area and to achieve the goal of creating mixed and balanced communities. Because of the shortcomings in the Hyas viability assessment, its conclusions over the deliverability of affordable housing at each of the three allocated GCs could not be relied upon. The Inspector stated that the further viability work that needs to be undertaken to correct those shortcomings will, therefore, also need to demonstrate that 30% affordable housing can be delivered at any GC that may be proposed.
- 4.53** It is the strongly held view of SPC that the viability work undertaken in relation to the LPR is inadequate and fails to take account of the high associated infrastructure provision associated with the proposed Wisloe Garden Village. Accordingly, it does not believe that the draft allocation is capable of delivering a policy compliant amount of affordable housing (30%). The NEI found that the viability assessment failed to deal adequately with transport infrastructure costs, land purchase and interest, or contingency allowances⁵³.

⁵¹ Paragraph 93, P.21, North Essex Authorities Joint Section 1 Plan Examiner's Report (December 2020)

⁵² Paragraph 55, P.38, North Essex Authorities Joint Section 1 Plan Examiner's Report (December 2020)

⁵³ Paragraph 64, P.39, North Essex Authorities Joint Section 1 Plan Examiner's Report (December 2020)

- 4.54** In terms of contingencies, the NEI concluded that a contingency allowance of at least 40% would align better with the approach taken by Highway England when costing large-scale infrastructure schemes⁵⁴. Consequently, he recommended that alongside the generic cost uplift figure of up to 10% used in the Hvas report, sensitivity appraisals be carried out based on additional contingency allowances of 20% and 40% on relevant infrastructure schemes for each GC, such as road improvements, park-and-ride and rapid transit. That would give an adequate range of possible costs to inform the overall viability assessment⁵⁵.
- 4.55** Consequently, SPC considers that the 5% contingencies allowance on all sites proposed in the Local Plan Viability Assessment ⁵⁶ is totally inadequate with regard to the proposed new Garden Community at Wisloe. A far higher and more realistic contingency allowance needs to be applied.
- 4.56** SPC considers that the NEI's finding that without more evidence to show that the necessary transport infrastructure for the GCs could be provided viably and in a timely fashion, the strong positive scores for the chosen strategy in respect of sustainable travel behaviour and accessibility were unwarranted⁵⁷. The NEI concluded that the authors of the SA report had generally made optimistic assumptions about the benefits of GCs, and correspondingly negative assumptions about the alternatives, without evidence to support many of those assumptions⁵⁸. As a result, the assessments lacked the necessary degree of objectivity and were therefore unreliable. These findings are considered by SPC to be particularly pertinent in the Wisloe context. It believes that SDC's Sustainability Appraisal has in a number of instances given unwarranted positive scores to the proposed settlement without actual evidence being available to justify them.
- 4.57** The NEI was of the view that any GC proposals must be clearly shown to be financially viable. He referred to the fact that the North Essex Authorities had, quite rightly, set high aspirations for the quality of their GC proposals and for the provision of affordable housing, open space, and social and community facilities in them. He stated that clarity was needed at the outset over the affordability and deliverability of

⁵⁴ Paragraph 77, P.41, North Essex Authorities Joint Section 1 Plan Examiner's Report (December 2020)

⁵⁵ Paragraph 78, P.42, North Essex Authorities Joint Section 1 Plan Examiner's Report (December 2020)

⁵⁶ Paragraph 7.42, Stroud Local Plan Viability Assessment Working Draft– May 2021

⁵⁷ Paragraph 99, P.46, North Essex Authorities Joint Section 1 Plan Examiner's Report (December 2020)

⁵⁸ Paragraph 103, P.46, North Essex Authorities Joint Section 1 Plan Examiner's Report (December 2020)

those aspirations, to ensure that they are not compromised during the development process because of unclear or conflicting expectations⁵⁹.

4.58 SPC considers that at present there is a severe lack of clarity to demonstrate that SDC’s Garden Village proposal at Wisloe is viable and deliverable alongside the necessary associated infrastructure if the specified policy requirements as set out in the LPR are fully adhered to (particularly in relation to the provision of affordable housing and carbon neutral development). It is concerned that they are mere aspirations, rather than firm commitments.

4.59 This lack of clarity is fully demonstrated by the very significant changes shown in the Local Plan Viability Assessment in relation to Wisloe between May 2020 and May 2021:.

Table 7.2 Strategic Sites. Initial Strategic Infrastructure and Mitigation Costs

	Yield	Cost (£)	Cost per dwelling
Wisloe	1,120	£38,158,083	£34,070

Source\: Arup (May 2020)

Table 12.5 Strategic Sites. Updated Strategic Infrastructure and Mitigation Costs

	Yield	Cost (£)	Cost per dwelling
Wisloe	1,500	£26,694,589	£17,796

Source\: Arup (May 2021)

4.60 SPC finds it very difficult to see how over the course of 12-months an increase in the settlement size from 1,120 to 1,500 dwellings can result a much lower overall indicative infrastructure cost and an almost halving of the cost per dwelling. Consequently, it considers that the Local Plan Viability Assessment lacks credibility.

⁵⁹ Paragraph 134, P.52, North Essex Authorities Joint Section 1 Plan Examiner’s Report (December 2020)

- 4.61** Indeed, the Parish Council would point out that if you count up the following costs identified for Wisloe in the IDP regarding: pre-school, primary and secondary school provision, further education demands and costs, healthcare, open space and green infrastructure, sports and recreational grounds, community space, libraries and policing, the total cost = £28,628,810. This being nearly £2 million above the Updated Strategic Infrastructure and Mitigation Costs identified within the Local Plan Viability Assessment.
- 4.62** The NEI questioned the Authorities' claims concerning sustainable modes of transport. He considered that even in the higher-investment scenario, it was by no means clear that the forecast end-to-end journey times for the Rapid Transit System (RTS) routes would offer any significant advantage over car journey times in current peak traffic conditions, while in current off-peak conditions the car would almost certainly be quicker for many journeys. In the lower-investment scenario, he felt that it was likely that the RTS would be considerably slower than the car for most if not all journeys, at all times of day. In this context, I consider that only in the higher-investment scenario would the RTS have any prospect of meeting Plan policy SP5's aspiration for sustainable modes of transport that could compete effectively with private vehicles, and of giving people a real choice over how they travel, as the NPPF advises⁶⁰.
- 4.63** SPC considers that similarly, there are very strong question marks concerning the sustainability claims being made in the LPR regarding the draft Wisloe Garden Village allocation. There appears to be no detailed evidence available to demonstrate that sustainable travel options will be both available or would likely be utilised for most types of journeys.
- 4.64** The NEI concluded that the Viability Appraisal shows that, with an appropriate 40% contingency allowance on transport and utilities infrastructure, the proposed **Colchester / Braintree Borders GC** would not achieve a viable land price, and that the proposed **West of Braintree GC** was below, or at best is at the very margin of, financial viability, contrary to advice in the PPG. On this basis, neither GC was deliverable⁶¹. Consequently, for the above reasons, therefore, the Inspector found that the proposed Colchester / Braintree Borders and West of Braintree GCs were

⁶⁰ Paragraph 136, P.93, North Essex Authorities Joint Section 1 Plan Examiner's Report (December 2020)

⁶¹ Paragraph 257, P.116, North Essex Authorities Joint Section 1 Plan Examiner's Report (December 2020)

not justified or deliverable. Consequently, he concluded that the Plan's spatial strategy, and thus the Plan itself as submitted, were unsound⁶².

Conclusions

- 4.65** In summary, SPC considers that Wisloe New Settlement shares many of the deficiencies highlighted by the Uttlesford, Hart and North Essex Local Plan Examination Inspectors, which resulted in the eventual deletion and removal of proposed Garden Communities from those Draft Plans.
- 4.66** Similarly, it is also evident that the removal of the proposed new settlement at Wisloe would not threaten the District's ability to meet its overall housing requirement. The LPR Housing Trajectory is currently showing a supply of 14,935 dwellings against an actual requirement for 12,600 dwellings. The removal of 1,500 dwellings in respect of Wisloe would still result in a housing supply of 13,735 dwellings against the 12,600 dwelling target. This would still represent a very healthy housing over-supply of 9% for Stroud District.
- 4.67** Furthermore, SPC believes that based upon past completion levels there is scope for SDC to make additional provision for additional categories of windfall provision such as Rural Exception Sites. The consequence of such action would be to further bolster the District's already very healthy housing over-supply.

⁶² Paragraph 261, P.117, North Essex Authorities Joint Section 1 Plan Examiner's Report (December 2020)

5 Conclusion

- 5.1** SPC strongly object to the Wisloe allocation on the basis that it is an unsuitable, undeliverable and fundamentally an unsustainable location to accommodate a new garden village.
- 5.2** This representation is comprehensive, but that is considered necessary to demonstrate that SDC's decision to include Wisloe New Settlement in the Regulation 19 LPR is not supported by evidence nor the outcomes of consultation in the plan making process. Members of SDC's Planning Review Panel clearly recognised the risks associated with allocating it in the Regulation 19 LPR when it failed to agree on its inclusion after 3 years of discussion.
- 5.3** SPC and WAG have repeatedly highlighted issues at the various consultation stages which, as demonstrated in these representations, remain unresolved. Rather, it is SPC's firm view that the technical evidence supporting these representations demonstrates that the Council's aspirations for Wisloe New Settlement to deliver significant social and economic benefits (such as policy compliant affordable housing provision), biodiversity net gain, high quality design, and carbon neutral development **by 2030** are fundamentally unrealistic and unachievable.
- 5.4** In order for the LPR to be found sound at Examination, Wisloe New Settlement should be deleted as it is not needed and would fail to adhere to Garden City principles and the other strategic objectives of the LPR. It would lack the critical mass to deliver the high sustainability standards that would be required given the very significant infrastructure costs associated with the project.
- 5.5** SPC considers that the proposed Wisloe New Settlement shares many of the deficiencies highlighted by the Uttlesford, Hart and North Essex Local Plan Examination Inspectors (as discussed in this representation), which resulted in the eventual deletion and removal of proposed garden communities from those Draft Plans.
- 5.6** We consider that there would be no adverse implications on the overall housing supply if Wisloe New Settlement is removed given that the objectively assessed housing need for the Plan period (including any unmet needs from neighbouring authorities) can still be met, including an adequate buffer. Indeed, its removal would

assist in ensuring that unnecessary competition does not harm sales of committed and proposed housing developments to the north of Cam and other more sustainable sites in the Berkeley Cluster. The LPR would thus only be effective with Wisloe New Settlement removed.

Test of Soundness

- 5.7** In view of the above, we consider that the LPR is not **‘positively prepared’**, **“justified”**, **“effective”** or **‘consistent with national policy’** in terms of planning for Stroud’s future growth given the absence of evidence to show that the Wisloe New Settlement is an appropriate strategy, taking into account the reasonable alternatives.
- 5.8** It’s proposed allocation is not required to meet the District’s overall housing requirement, and conflicts with the strategic objectives of the LPR and the delivery of sustainable development. The LPR is also not supported by technical evidence to demonstrate that Wisloe New Settlement would be sustainable, viable or deliverable within the Plan period.

Proposed Modifications

- 5.9** To address the soundness issues, we propose that:
- 1.** Wisloe New Settlement (Policy PS37) should be deleted as an allocation in the LPR.
 - 2.** Consequential amendments should be made to Core Policy CP2 (Strategic Growth and Development Locations) and to tables 3 and 5 of the LPR to reflect the deletion of Wisloe New Settlement.

**JD/1624/
21 July 2021**



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MICHELLE BOLGER
Expert Landscape Consultancy

Site Appraisal
of
Draft Site Allocation PS37 for a
New Settlement at Slimbridge

Prepared for
Wisloe Action Group

February 2021



MICHELLE BOLGER
Expert Landscape Consultancy

Company Registration No. 09809868
Registered Office: 35 Pickford Road Bexleyheath DA7 4AG

Prepared by: **John Jeffcock**

Position Associate Landscape Architect

Qualifications: CMLI, Registered NZILA, MLA, BA (Hons) LA

Reviewed by: **Michelle Bolger**

Position: Director I Landscape Architect

Qualifications: CMLI, Dip. LA, BA (Hons) LA, PGCE, BA (Hons) Eng

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Appendix 1: Figures



1 INTRODUCTION & BACKGROUND

1.1 Stroud District Council (SDC) are in the process of reviewing their adopted Local Plan (LP). To date, the review process has involved four consultation stages:

- Stage 1 - **Issues and Options** (October 2017 - December 2017).
- Stage 2 - **Emerging Strategy** (November 2018 - January 2019).
- Stage 3 - **Draft Local Plan** (November 2019 - January 2020).
- Stage 4 - **Additional Housing Options** (October 2020 - December 2020).

1.2 At Stage 3, a policy for a new settlement centred on Wisloe Road in the parish of Slimbridge was included in the Draft LP (Draft Policy PS37 *New settlement at Wisloe*). Draft Policy PS37 is for ‘*a new garden community comprising 5ha employment, up to 1,500 dwellings, local centre including shops and community uses, primary school(s) and associated community and open space uses and strategic green infrastructure and landscaping*’.¹ Slimbridge was not identified as a location for a new settlement in previous stages of the review process. Land within PS37 is being promoted by its landowners (Gloucestershire County Council (GCC) and the Ernest Cook Trust (ECT)). In addition to PS37, a policy to allocate land immediately south of PS37, north of Cam, for another substantial development was introduced in the Draft LP (Draft Policy PS24 *West of Draycott*). PS24 is for ‘*up to 700 dwellings, primary school, strategic landscaping and green infrastructure and associated community and open space uses*’.² The location of PS37 and PS24 is shown on **Figure 1** of the figure set which accompanies this appraisal (Appendix 1).

1.3 Wisloe Action Group (WAG) have expressed their concerns over SDC’s proposal for, and the potential landscape harm of, a new settlement in Slimbridge. Their representations on the Draft LP identified a lack of evidence to support the choice of Slimbridge as the location for a new settlement and identified significant constraints to the deliverability of a garden village, or any large development within the PS37 land.³ WAG anticipate that PS37 will be taken forward into the pre-submission version of the LP (expected this Spring) and have instructed Michelle Bolger Expert Landscape Consultancy (MBELC) to prepare an appraisal identifying the main constraints to the development of a new settlement at Slimbridge.

¹ Stroud District Local Plan Review Draft Plan 2019 Page 122

² Stroud District Local Plan Review Draft Plan 2019 Page 95

³ Wisloe Action Group’s Response to Stroud District Council’s Draft Local Plan Consultation, 21st January 2020

- 1.4 Although not a full landscape and visual impact assessment, this appraisal follows the principles for landscape assessment set out in the Landscape Institute/Institute of Environmental Management and Assessment's *Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013)* (GLVIA3). It is also consistent with the principles for using landscape character assessments as set out in Natural England's *An Approach to Landscape Character Assessment (2014)*.



2 NATIONAL PLANNING POLICY CONTEXT

2.1 National Planning Policy is set out in the National Planning Policy Framework February 2019 (NPPF). To satisfy national policy objectives, planning should:

- Contribute to protecting and enhancing our natural, built and historic environment. (Paragraph 8)
- Include strategic policies within plans which make sufficient provision for housing, employment, retail and leisure. (Paragraph 20)
- Ensure sufficient land comes forward where it is needed to support the Government's objective of significantly boosting the supply of homes. (Paragraph 59)
- Consider new settlements or significant extensions to existing villages and towns for the supply of large numbers of new homes, provided they are well located and designed, and supported by the necessary infrastructure and facilities. (Paragraph 72)
- Set clear expectations for the quality of new settlements/ significant settlement extensions, and how this can be maintained, such as by following Garden City principles. (Paragraph 72)
- Protect and enhance PRoWs and access. (Paragraph 98)
- Be visually attractive and sympathetic to local character and history, including the surrounding built environment and landscape setting. (Paragraph 127)
- Establish or maintain a strong sense of place. (Paragraph 127)
- Protect and enhance valued landscapes. (Paragraph 170)
- Recognise the intrinsic character and beauty of the countryside. (Paragraph 170)
- Recognise the wider benefits of trees and woodland. (Paragraph 170)



3 LANDSCAPE CONTEXT

Published Character Assessments

- 3.1 At a national level, PS37 and Slimbridge parish are located in the eastern part of National Character Area (NCA) 106: Severn and Avon Vales. NCA 106 is described as a low-lying open agricultural vale landscape. Settlement pattern within this area consists of *‘towns and nucleated villages’* although *‘towards the west and particularly on the poorer land there are hamlets and common-edge settlements in a rather dispersed pattern’*.⁴
- 3.2 At a county level, PS37 has been assessed as part of the Gloucestershire Landscape Character Assessment, 2006 (GLCA, 2006). Within that study, PS37 together with the settlements of Slimbridge, Cambridge and Gossington are located within the Settled Unwooded Vale Landscape Type (LT) and SV6A Vale of Berkeley Landscape Character Area (LCA) (**Figure 3**). SV6A is described as an open, gently undulating landscape with a patchwork pattern of land uses and tree cover, where an otherwise strong rural character is disturbed by the M5, A38 and railway corridors. Settlement includes numerous villages scattered throughout the vale.
- 3.3 At a district level, PS37 has been assessed as part of the Stroud District Landscape Assessment, 2000 (SDLA, 2000) (adopted Supplementary Planning Guidance (SPG)). Within that study, PS37 together with the settlements of Slimbridge and Cambridge are located within the Rolling Agricultural Plan LT (LCT 5), and the part differentiated as the ‘Lowland Plain’ (**Figure 4**). Gossington is within a different LT (LCT 6 the Undulating Lowlands) and the western parts of the parish are within the Severn Vale Grazing Marshes LT (LCT 8).
- 3.4 The key characteristics of LCT 5, in which PS37 is located, describe a *‘varied landscape of open flat plain to more undulating landform towards limestone escarpment’* with a mix of arable and pasture across a strong field pattern which is medium to small in scale. The area is said to be *‘traversed from north to south by the M5, railway and the A38’* and features a dispersed settlement pattern of isolated villages, where churches act as strong foci and landmarks.⁵ The LT is said to have *‘a distinctive type of settlement composed mainly of small villages and hamlets of medieval origin, dispersed over the landscape to form a relatively regular pattern’*.⁶ Slimbridge is cited as an example of one of these settlements, and one which has a church whose spire is visible across the relatively flat terrain. The transport routes which cross

⁴ National Character Area 106: Severn and Avon Vales Page 24

⁵ Stroud District Landscape Assessment, 2000 Page B30

⁶ Stroud District Landscape Assessment, 2000 Page B33



the Lowland Plain (M5, A38, and railway) are said to dissect the lowland landscape and fragment its characteristic pattern.⁷

- 3.5 The landscape including and surrounding PS37 is recognisable in the description of ‘human response’ for LCT 5. This states that *‘the strong pattern of settlement, churches, lanes and field enclosure are characteristic features of this landscape. Together they provide a recognisable network that is valuable for cultural reasons as well as for local identity and sense of place, and give an impression of a landscape long worked and inhabited. The quality of this landscape is however varied with some areas degraded by roads and associated developments or inappropriate housing, that undermines the rural qualities of the villages. Despite this however, there remain significant areas that are either unspoilt, or only slightly degraded and which are still worthy of protection to ensure the conservation and the retention of characteristic elements.’*⁸
- 3.6 The ‘Key Priorities for Action’ in LCT 5 include: *‘Review the schedule of conservation areas to protect small settlements’* and *‘Control sporadic development along the major routes and at the edges of small settlements’*.⁹
- 3.7 At a parish level, the Slimbridge Village Design Statement, 2017 (SVDS, 2017) (adopted Supplementary Planning Advice (SPA) *‘draws attention to what is special about the buildings, open spaces and settings in the parish’*.¹⁰ A map on Page 3 of the SVDS illustrates how the parish is defined by a dispersed settlement pattern comprising two villages (Slimbridge and Cambridge) and six separate hamlets. The number of dwellings within the parish is given as 463.¹¹ The spire of St Johns Church is described as *‘a prominent feature within the landscape of Slimbridge as it can be seen from most areas and it is a defining feature of the parish’*.¹²
- 3.8 The SVDS, 2017 includes a number of guidelines, one of which is SLN 2. This states: *‘In order to protect the separate identity of the villages and hamlets and the quality of the countryside (including its built and natural heritage), proposals outside identified settlement development limits will not be permitted that do not accord with the principles in the Adopted Stroud District Local Plan (2015) and particularly where they also involve the loss of quality landscape features or result in an adverse impact on local character. It is important to prevent the areas merging into one another so as each hamlet can keep its own identity and preserve its setting and character.’*¹³ (emphasis added)

⁷ Stroud District Landscape Assessment, 2000 Page B34

⁸ Stroud District Landscape Assessment, 2000 Page B34

⁹ Stroud District Landscape Assessment, 2000 Page B30

¹⁰ Slimbridge Village Design Statement, 2017 Page 5

¹¹ Slimbridge Village Design Statement, 2017 Page 11

¹² Slimbridge Village Design Statement, 2017 Page 7

¹³ Slimbridge Village Design Statement, 2017 Page 42



Landscape Context to PS37

- 3.9 PS37 comprises approximately 82 hectares of mostly arable farmland sandwiched between the A38 to the north west, the M5 to the south east, the Cross-Country railway line to the south and the River Cam corridor to the north east. The M5 is raised on embankment around the southern parts of PS37, where it crosses the railway. The M5 is the eastern boundary of Slimbridge parish and east of the M5 are the parishes of Coaley and Cam. **(Figure 1)** The M5 also broadly marks a change in landscape character. **(Figure 4)** West of the M5 and east of the Severn Estuary is a lowland plain landscape type. East of the M5, land rises around the ‘footslopes’ of the Cotswold Escarpment (the ‘Cotswold Edge’). This escarpment rises prominently above the lowland plain and forms an attractive backdrop to the parish. **(Figure 2 and photographs on Figures 9 and 10)**
- 3.10 Slimbridge parish has a distinctive settlement pattern which consists of two villages and a number of scattered hamlets separated by areas of countryside. Both villages (Slimbridge and Cambridge), and at least one of the hamlets, (Gossington) are mentioned in the Domesday Survey of 1086. Slimbridge, Cambridge and Gossington are connected along the A38 which is the route of the Roman road from Gloucester to Sea Mills, Bristol. The A38 runs through Cambridge, whereas Gossington and Slimbridge are located immediately west of the A38. Slimbridge and Cambridge are the only settlements which have defined settlement boundaries.¹⁴ Slimbridge is the largest settlement but is itself only a small village. Its role as the main settlement within the parish is signalled by the prominent spire of the 13th Century Church of St John the Evangelist (Grade I). The absence of any large settlement is significant to the parish’s character. The pattern of small villages and hamlets, of possible pre-medieval origin¹⁵, together with historical buildings, is a distinctive feature of the local landscape character, as identified in published landscape character assessments (above).
- 3.11 In contrast with the dispersed small scale settlement pattern found in Slimbridge, south of the M5/railway corridors in Cam parish, is one of the District’s main towns (Cam).¹⁶ Significant growth is underway within the northern part of Cam, east of the A4135, between the existing defined settlement boundary and Cam & Dursley Station. This growth consists of several separate housing developments north of Box Road (both complete and under construction) and a substantial mixed used development south east of Box Road (under construction) which is part of an existing strategic site allocation (Policy SA3 North east of Cam). Immediately south of the railway, west of the A4135, lies draft allocation PS24. Land within PS24 has already been

¹⁴ Stroud District Local Plan November 2015 (Slimbridge is classified as a Tier 3 settlement; Cam is a Tier 4 settlement)

¹⁵ Land at Wisloe Green, Heritage Assessment Cotswold Archaeology August 2019 Paragraph 3.17.

¹⁶ Stroud District Local Plan November 2015 Page 30 (Classified as a First-Tier settlement)



the subject of an EIA Scoping Request submitted to SDC in preparation for outline planning applications seeking permission for up to 1,100 dwellings.¹⁷ (Figure 1)

PS37

- 3.12 The major transport corridors, and the A4135 which bisects PS37, have impacted on the amenity and tranquillity of countryside within the eastern parts of Slimbridge, including within PS37. Additionally, the scenic quality of the local countryside has been impacted by a patchwork of disparate land uses north of the A4135, surrounding PS37, (e.g., Wisloe Business Park, football club, stables, manufacturing uses). These uses, near the A38 roundabout along Wisloe Rd, read as a loosely connected extension of Slimbridge village. Less development is found within the countryside south of the A4135, and as a result, southern parts of PS37 have retained a more coherent rural character. The exception to this being Rocket Rentals (plant / tool hire), which is located south of the A38 (Slimbridge) roundabout on the eastern side of the A38. Due to the impacts generated by the transport corridors, and the patchwork of land uses, the value derived from perceptual aspects within this eastern part of Slimbridge (including PS37) is likely to be less than in parts of the parish further from the A38/M5. However, the corridor of land which comprises PS37 is valued in particular for its contribution to the maintenance of a sense of separation between the settlements within Slimbridge parish (along the A38) and separating those from the growing northern extent of Cam (along the A4135 and Public Rights of Way (PRoW) network). For its role in maintaining the characteristic local settlement pattern, PS37 is highly valued.

¹⁷ Land at Draycott, Cam, EIA Scoping Request, May 2020



4 CONSTRAINTS

4.1 This section identifies the key landscape and visual constraints to the development of PS37 for a new settlement. Related constraints which impact upon the connectivity of the site are also summarised. **Figure 8** provides an illustrative overview of these constraints.

Loss of Settlement Separation (Slimbridge & Cam)

4.2 As highlighted in the SVDS, 2017, protecting the separate identities of villages and hamlets within Slimbridge is of local importance. PS37 would not result in a separate new settlement as is implied by the policy but would instead effectively join the currently separate settlements of Slimbridge, Cambridge, Gossington and Cam, harming one of the key characteristics of the local landscape in Slimbridge. The connection to Cam would be in combination with a separate draft allocation site (PS24) which lies immediately south of PS37 on the opposite side of the M5/railway corridors. Given the close proximity of the two allocations, the cumulative impact of their combined development on settlement separation must be considered.

4.3 **Figures 5, 6 & 7** were prepared in order to illustrate how the existing sense of separation would be impacted by the allocation of only PS24 compared to a combined allocation of PS24 and PS37. Figure 5 shows how land within PS37 currently provides a corridor of mostly open countryside between the expanding settlement of Cam and the settlements within Slimbridge. If PS24 were to proceed without PS37, then this corridor of separation would be unaffected and growth would be consolidated around the north of Cam, south of the railway. If PS24 and PS37 were both allocated, Cam would no longer appear to be contained by the railway line, and instead a continuous band of settlement would stretch between Dursley in the south east and Slimbridge in the north west. The gap between Slimbridge and Cam along the A4135 is already small (between 960m to 1.5km, depending on where it is measured from (refer Figure 5)). The majority of this land would be developed as part of PS24 and PS37. Land leftover would be insufficient in size to provide any meaningful sense of separation between the settlements. Settlement and parish identity would be severely undermined. This would be compounded by the size of PS37 (1,500 dwellings, which is over three times more dwellings than are currently in the entire parish) which would overwhelm the existing settlements.



Loss of Settlement Separation & Visual Coalescence (Slimbridge, Cambridge & Gossington)

- 4.4 As well as connecting Slimbridge and Cam, development of PS37 would also result in the connection of Slimbridge, Cambridge, and Gossington along the A38. PS37 continues virtually all the way along the eastern side of the A38 and is only broken by a small amount of existing development, and a small area of land which is not being promoted (White House). While open countryside would remain between these settlements away from the A38, users of this road would not experience any meaningful sense of separation, and visual coalescence between existing and new settlements would emphasise the lack of any clear gaps between/ defining settlements.
- 4.5 Slimbridge village begins at Slimbridge Primary School west of the A38 roundabout (**Figure 1**). Signs welcoming road users into Slimbridge are located immediately after the roundabout, which serves as a gateway into the village. Development on the eastern side of the roundabout, within the Wisloe Rd Business Park, increases the presence of development around the roundabout and reads as an outlying part of Slimbridge. The gap between buildings in the Business Park and the southern edge of Cambridge is small (around 240m) and, along the eastern side of the road, is a field which is part of PS37. If PS37 were allocated, the gap would be reduced to 80m, which is insufficient to provide any meaningful sense of separation for people walking, cycling, or driving between Slimbridge and Cambridge.
- 4.6 From the southern edge of Slimbridge e.g., from Fp 31, the narrow gap between existing development around the A38 roundabout (including the school) and the southern edge of Cambridge is clearly seen (**Figure 10**). If development were to occur alongside the 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 between St John's Road in Slimbridge to the southern edge of Cambridge. Similar impacts would be experienced from within Slimbridge along St John's Rd, looking north (**Figure 11**).
- 4.7 Gossington also begins immediately west of the A38 shortly after Gossington Bridge. Leaving Gossington and joining the A38, there are views across the southern parts of PS37. This part of PS37 has a more coherent rural character than northern parts of PS37, and although it is clearly impacted by the transport networks it is an attractive piece of landscape, particularly in combination with views of the Cotswold Edge. (**Figure 9**) The openness of the fields within the southern part of PS37 also make a positive contribution to the 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.



- 4.8 Along Dursley Road, development would replace the existing countryside gap between development along Wisloe Rd and the southern edge of Cambridge, which is marked by the Barton Field Exception Site & Narles Rd (this development is proposed to be included within Cambridge's SDL in the Draft LP). There would be no meaningful gap between Cambridge and Slimbridge. The settlements would run into each other, forming a continuous urban area. Even if the slightly smaller site promoted by GCC and ECT (GCC and ECT Site) (Figure 1) were allocated/ developed, the gaps along Dursley Road would be too small to allow for any real sense of having departed one settlement before arriving at the next.
- 4.9 From elevated areas north of PS37, such as Fp 6 south of Potgaston farm, northern parts of PS37 are visible together with the expanding northern edge of Cam. From here, PS37 is seen as part of the wider countryside setting to Cam (Figure 13). From such locations, development within PS37 has the potential to be seen as sprawl / a large extension to the built-up area at Cam.
- 4.10 A Landscape and Visual Technical Note has been prepared by PBA/Stantec, on behalf of GCC and ECT (October 2019) (LVTN, 2019). It is a high-level review of landscape and visual matters, based on the slightly smaller GCC and ECT Site. The LVTN fails to address the issue of settlement separation / potential coalescence which is still a relevant constraint even with the smaller site. The LVTN mistakenly states that Gossington is located '0.4km' away from the GCC and ECT Site. The distance is actually only the width of the A38 junction which is approximately 30m. (Figure 7) Similarly, the Landscape and Visual Concept Plan (Figure L3) within the LVTN is misleading as it suggests Slimbridge village is set back further from the A38 than it really is. These errors however do not explain why there was no consideration in the LVTN of one of the most significant constraints to the development of a new settlement at Slimbridge.

Views of Slimbridge Spire

- 4.11 The SVDS, 2017 states that '*the spire of St Johns Church is a prominent feature within the landscape of Slimbridge as it can be seen from most areas and it is a defining feature of the parish*'.¹⁸ This important church has been described as '*Probably the best example in the county of the Early Gothic Style of the C13*'.¹⁹ The tall spire is a landmark not just in Slimbridge but across the surrounding vale, footslopes and Cotswold escarpment. Fields within PS37 are visible in views towards the church (referred to locally as Slimbridge Spire). Examples include views looking west from Dursley Road, and the PRoW network within and near the

¹⁸ Slimbridge Village Design Statement, 2017 Page 7

¹⁹ Gloucestershire: The Vale and the Forest of Dean (The Buildings of England) David Verey Page 339



southern parts of PS37. Views towards Slimbridge Spire from Fp 45 south of PS37 are particularly attractive. The spire is seen above the fields within PS37, with hedgerows and trees providing an attractive layering beneath the church, and with the hills in the Forest of Dean seen in the distance beyond. (Figure 12). The character of these views would be altered with the development of fields within PS37 for residential/employment use. In the case of views from Dursley Rd and Fp 45, visibility of the church is likely to be replaced with buildings within the new settlement. Such changes can harm the character and amenity of the local countryside.

Public Rights of Way (PRoW)

- 4.12 Development within PS37 would potentially impact directly on two PRoW which are located within the site (Fp 46 & Fp 48). Two other PRoWs (Fp 34 & Fp 35) are located immediately alongside the northern parts of the PS37.

Cotswolds AONB

- 4.13 Development within PS37 would be visible from within the AONB, notably at Cam Peak. However, it is unlikely to be considered to cause harm to the AONB or its setting on account of its distance from the AONB and the presence of considerable existing intervening development.

Constraints to Connectivity

- 4.14 Policy PS37 envisages development '*will take place in accordance with Garden City Principles*'.²⁰ Ease of movement and connectivity is one of the basic garden city design principles.²¹ PS37 is a relatively complex site. It includes four parcels of land separated by existing roads. Three parcels are located north of the A4135 and one large parcel is found south of the A4135. Amongst the northern three parcels is land which is not being promoted. This includes land at White House, and land north of Wisloe Rd. Rather than being a well-connected site, PS37 is fragmented by areas of separation and the busy A4135. The A4135 in particular creates a significant physical and visual barrier across the site, especially as it is partly on embankment.
- 4.15 The major transport corridors of the M5 and railway which define the south and eastern parts of PS37 (and the River Cam to the north) are also significant barriers to external movement and connectivity. A key objective of PS37 is to have cycling and walking links to Cam & Dursley Station. Although the A4135 crosses both the M5 and railway, it is a busy road, and the railway bridge lacks sufficient space for the creation of a safe pedestrian / cycle route. This issue is

²⁰ Stroud District Local Plan Review Draft Plan 2019 Page 122

²¹ Practical Guides for Creating Successful New Communities Guide 3: Design and Masterplanning, TCPA 2017 Page 16



raised in the Highways and Transport Technical Overview Note prepared on behalf of GCC and ECT by PBA/Stantec in October 2019. The Note identifies possible solutions which include a new bridge over the M5; an option which is shown on the Concept Plan prepared by GCC and ECT.²²

4.16 Other factors which would impact upon connectivity across the site and the ability to deliver a new settlement in accordance with *Garden City Principles* are:

- **Gas Pipeline** - PS37 is fragmented by a high-pressure gas pipeline which runs north-south through the middle of the site. The Health and Safety Executive sets a consultation distance around pipelines, comprising an inner, middle and outer zone. The Inner and Outer Zones are highlighted on Figure 8. The latest Concept Plan prepared by GCC and ECT shows development areas above these zones.
- **Noise** - Land within PS37 is affected by noise generated by vehicles using the immediately adjacent transport corridors, namely the M5, A38, A4135 and the railway line, and from industrial activity at the Rocket Rentals site. Noise from the M5 is particularly noticeable within the landscape around the M5 where it is on embankment.
- **Flood Risk** - The River Cam flows immediately north of PS37. Land alongside the River Cam is classified by the Environment Agency (EA) as Flood Zone 2 & 3. Land alongside the northern boundary of PS37 is Flood Zone 2. Areas at risk of flooding from surface water are also identified by the EA and are mapped on Figure 8.
- **Archaeology** - Figure 8 highlights areas²³ within PS37 which have been identified by Cotswold Archaeology²⁴ as areas with high potential for archaeology relating to Roman activity/settlement.
- **Severn Estuary European Marine Site** - Although not a constraint to connectivity within the site, it is relevant to note that PS37 is located within 3km (and therefore the 7.7km mitigation catchment²⁵) of the Severn Estuary European Marine Site (EMS), which contains Special Protection Area (SPA), Special Area of Conservation (SAC), Ramsar and SSSI designations.

²² <https://www.wisloe.co.uk/index.php?contentid=13>

²³ As identified on Figure 2 of the Heritage Assessment (identified by references, 10, 11 & 12)

²⁴ Heritage Assessment prepared on behalf of GCC and ECT by Cotswold Archaeology August 2019

²⁵ SDC's Strategy for Avoidance of Likely Significant Adverse Effects on the Severn Estuary SAC, SPA and Ramsar Site (2017)



5 LOCAL PLAN ASSESSMENTS

Introduction

- 5.1 PS37 has been considered at various stages of the preparation of evidence for the LP Review. Below is a summary of the findings from the relevant evidence base assessments.

Strategic Assessment of Land Availability (SALA) New Sites Update Report, October 2018

- 5.2 This report considered the suitability, availability, achievability and development potential of additional sites submitted after the production of the main SALA report (May 2017). Land within PS37 was not assessed as a single site, but three separate sites within PS37 were assessed. These sites are SLI002, SLI004 and SLI005. A concern regarding adverse impacts on settlement separation was identified in relation to the suitability of these sites, which stated for each *'Piecemeal development in this area would erode the countryside gap between Slimbridge, Cambridge and Cam'*. Confusingly, despite separation being identified as a concern in relation to the individual sites SLI002, SLI004 and SLI005, each site assessment also included a statement that there may be potential for a more comprehensive development if additional land assembly were to occur.

Strategic Assessment of Land Availability (SALA) New Sites Update Report, November 2019

- 5.3 Two areas of land which were not previously assessed but make up the remainder of the PS37 site, were submitted and assessed as part of this further update to the SALA. These sites are SLI006 and SLI007. Both sites were found to have 'future potential' due to their proximity to land identified with potential for a comprehensive development (i.e., sites are SLI002, SLI004 and SLI005). Under the suitability assessment of site SLI006 it states, *'Given the proximity with Cambridge, any development on this site would need to include the creation of a substantial landscaped buffer to prevent coalescence with Cambridge'*.²⁶ Given the immediate proximity of this site to Cambridge, it is hard to conceive of a landscape buffer which would be sufficient to prevent harm to the legibility/ identity of Cambridge as a discrete settlement.

²⁶ Strategic Assessment of Land Availability 2019, Appendix 3, Site SLI006



The Assessment of Strategic Development Opportunities in Stroud District, May 2020

- 5.4 The Assessment of Strategic Development Opportunities²⁷ was ‘intended to support the early stages of the plan making process’²⁸ and ‘inform the search for suitable strategic development land beyond the existing settlement boundaries in the study area’.²⁹ However, it was published 6 months after PS37 was first identified in the Draft LP and therefore cannot have informed the selection of the site.³⁰ The entire district of Stroud was included within the study area and ‘potentially developable land’ was identified by excluding land which did not meet criteria relating to sustainability, constraints, viability, and size. The remaining land was organised into ‘Broad Areas’ which were used for a landscape sensitivity assessment (included as part of The Assessment of Strategic Development Opportunities).
- 5.5 The landscape sensitivity assessment considered the sensitivity of the Broad Areas to residential development (in general) using seven criteria³¹. Broad Areas were then subdivided into ‘Assessment Areas’, which became the primary units for reaching overall judgements of landscape sensitivity to specific types (scales) of residential development, specifically: ‘small village’ (1,500-5,000 dwellings), ‘large village’ (5,000-10,000 dwellings), ‘town/city’ (10,000 + dwellings). However, the Assessment Areas were not subject to a finer grain assessment and judgment concerning sensitivity to the different types of development were based on the conclusions reached for the Broad Areas. The definition 1,500-5,000 dwellings as a small village is questionable.
- 5.6 Land at PS37 falls within Broad Area 11 (BA 11) and Assessment Area 49 (AA 49) (New Settlement). BA 11 scored moderately against four sensitivity criteria and moderate-high against three criteria. No finer grained assessment was undertaken for AA 49, despite covering a significantly smaller area than BA 11, and it was not re-assessed against the sensitivity criteria. Overall sensitivity ratings for AA 49 were provided (‘moderate’ for small village, ‘moderate-high’ for large village, and ‘high’ for town/city). The accompanying text provided in Appendix 2B to the assessment lacks sufficient detail to explain how these judgements were reached.

²⁷ The Assessment of Strategic Development Opportunities in Cheltenham Borough, Gloucester City, Tewkesbury Borough, Stroud District and Parts of Forest of Dean District Prepared by Land Use Consultants, May 2020

²⁸ The Assessment of Strategic Development Opportunities in Stroud District, May 2020, Para 1.8

²⁹ The Assessment of Strategic Development Opportunities in Stroud District, May 2020, Para 1.1

³⁰ An Interim Assessment was prepared in October 2019, although the assessment of land within PS37 is omitted from the version on the Council’s website.

³¹ The headings of the criteria are: Physical character; Natural character; Historic landscape character; Form, density, identity and setting of existing settlement/ development; Views and visual character including skylines; Access and recreation; Perceptual and experiential qualities



- 5.7 One of the criteria used to assess the Broad Areas was called '*Form, density, identity and setting of existing settlement/development*'. (BA 11 scored moderately against this criterion) An example of how an area might score highly against this criterion was provided in the study which corresponds closely with the situation at PS37. The example cites an area which forms '*an important part in the perception of a gap between settlements. Development in the assessment area would have a poor relationship with the existing settlement form/pattern*'.

Other Sensitivity Studies

- 5.8 Two other sensitivity studies have been undertaken within the Stroud District but neither considered land within PS37 (presumably because they were undertaken before the idea for delivering a new settlement at Slimbridge was identified). These studies are the Landscape Sensitivity Appraisal prepared by URS in 2013 which considered the sensitivity of thirty-five potential growth locations to development (housing, mixed-use and employment) and the Landscape Sensitivity Assessment prepared by White Consultants in 2016 (part of LP Review evidence base) which considered the sensitivity of land directly around Tier 1, 2 and 3 settlements to accommodate future housing and employment uses.

Summary

- 5.9 Neither of the detailed landscape sensitivity studies 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 at Slimbridge (including PS37) to a new settlement is *The Assessment of Strategic Development Opportunities*, May 2020, and 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.



6 SUMMARY & CONCLUSION

- 6.1 A policy for a new settlement within the parish of Slimbridge was included in the Draft LP (Draft Policy PS37 *New settlement at Wisloe*). Draft Policy PS37 seeks to deliver a ‘new garden community’ with up to 1,500 dwellings. This would be in addition to 700 dwellings in a separate draft allocation (PS24) located immediately south of PS37 in Cam parish and adjacent to Cam.
- 6.2 This appraisal finds that PS37 is constrained by a number of factors. Of greatest importance in landscape character terms is the impact that development within PS37 would have on the local settlement pattern, both the sense of separation between settlements in Slimbridge, and their separation with Cam. This appraisal has found that PS37 would harm the identity of the separate settlements within Slimbridge by connecting them along the A38 and Dursley Rd, and through visual coalescence. This would result in the loss of a distinctive and valued characteristic of Slimbridge Parish.
- 6.3 Furthermore, the ability to deliver a new settlement in accordance with Garden City Principles is undermined by a number of constraints which impact upon the availability of developable land and fragment the site. These include:
- Gaps in the connectivity of available land, as a result of landowners not promoting land, including White House, and land north of Wisloe Rd.
 - Land immediately alongside the M5 and railway which would have limited connectivity with the surrounding landscape and is likely to have poor residential amenity.
 - Infrastructure including a high-pressure gas pipeline and the A4135.
 - Areas at risk of flooding, including from fluvial and surface water sources.
 - Areas with high potential for archaeology.
- 6.4 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.



Appendix 1: Figures



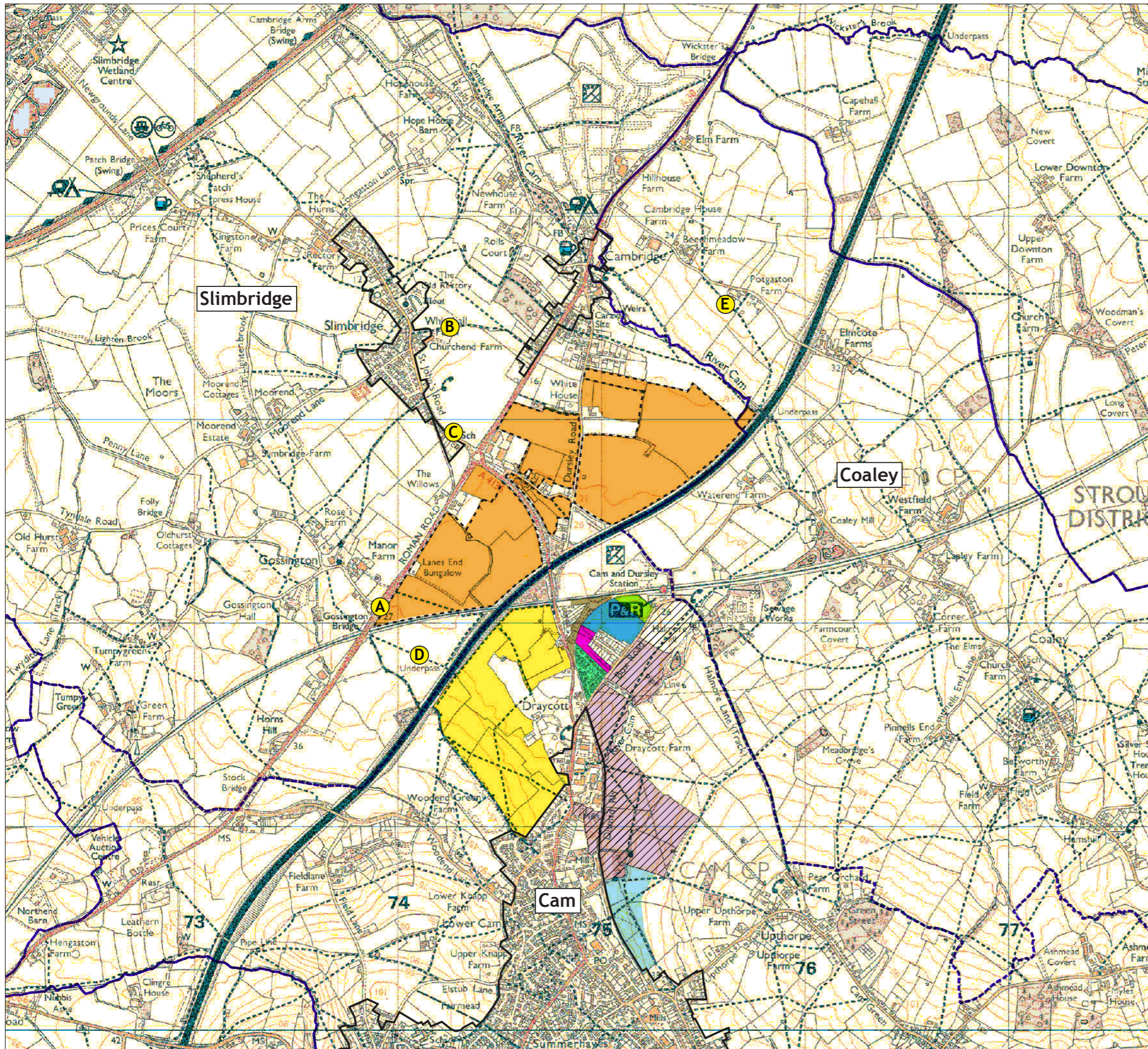


FIGURE 1
PS37 Location & Context



PROJECT
1167
Draft Allocation PS37 Wisloe, Stroud

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January 2021

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

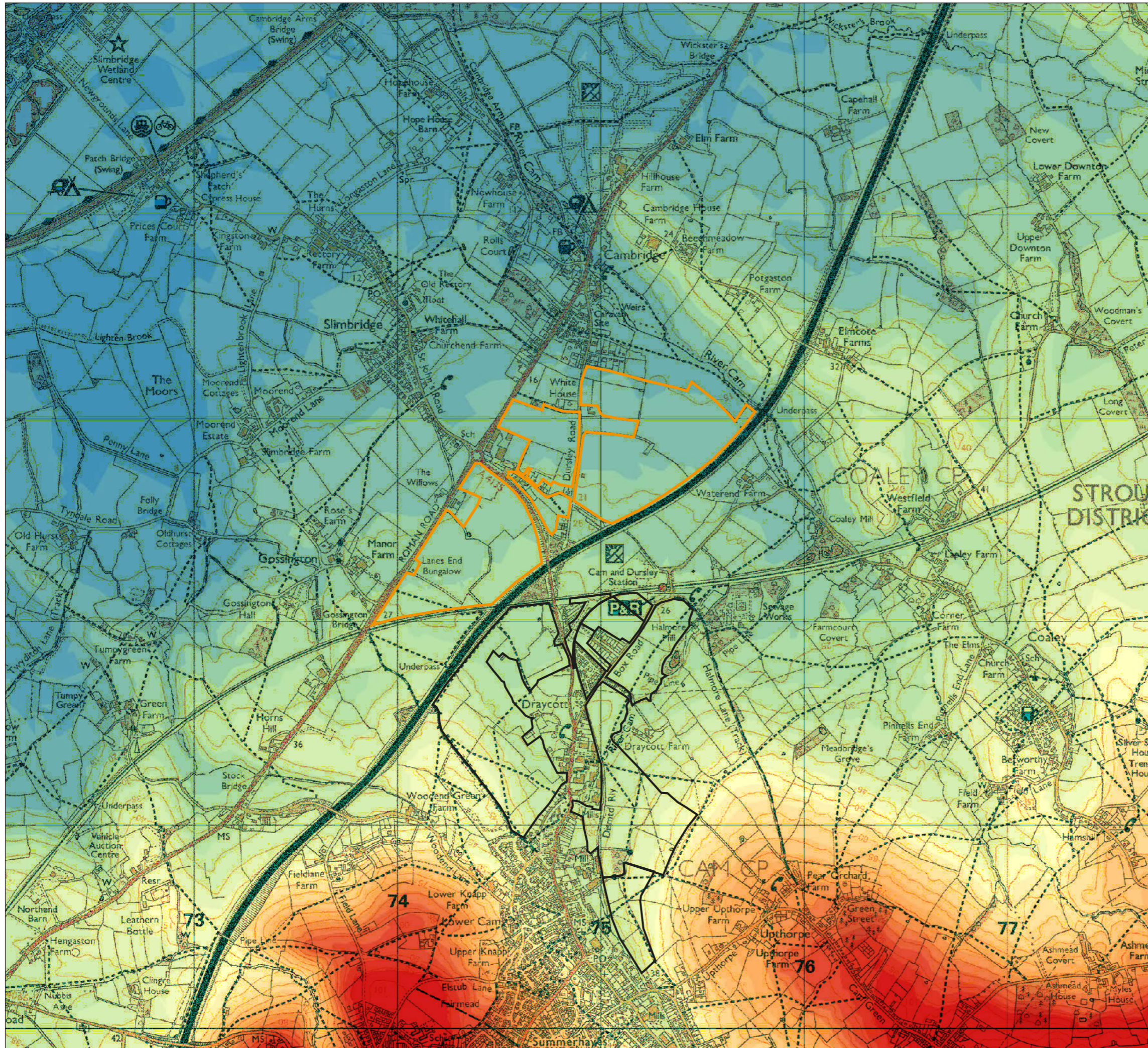


FIGURE 2
Topography



PROJECT
1167
Draft Allocation PS37 Wisloe, Stroud

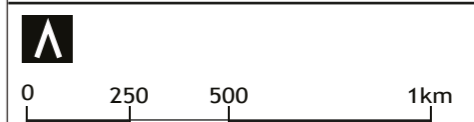
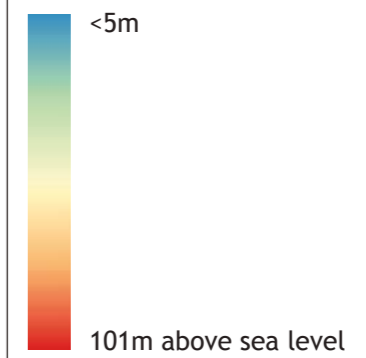
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Legend

- Proposed New Settlement (Draft Policy PS37) (1,500 dwellings)
- Development Context (Refer to Figure 1)

Topography (4m contour intervals)



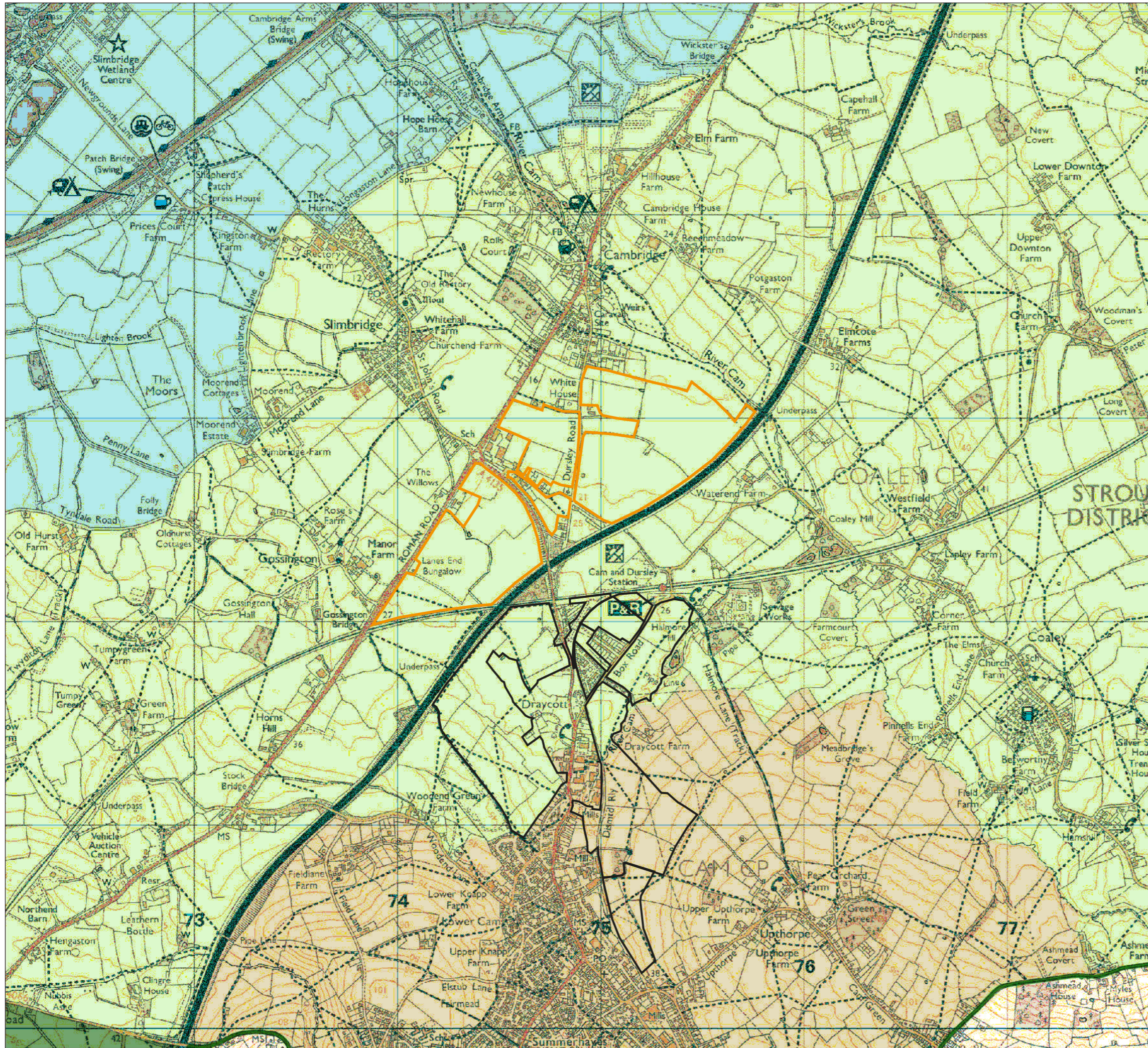


FIGURE 3
County Landscape Character



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Draft Allocation PS37 Wisloe, Stroud

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Legend

- Proposed New Settlement (Draft Policy PS37) (1,500 dwellings)
- Development Context (Refer to Figure 1)

Gloucestershire Landscape Character Assessment 2006

Landscape Character Types (LCT) & Areas (LCA)

- LCT: Settled Unwooded Vale
- LCA SV6A Vale of Berkeley
- LCT: Rolling Hills and Valleys
- LCA SV13A Dursley, Cam and Uley Valley
- LCT: Drained Riverine Farmland and Grazed Salt Marsh
- LCA SV2B Slimbridge and New Grounds Marshes
- LCT: Unwooded Vale
- LCA SV5A Kingswood and Wick Vale
- Cotswolds AONB



0 250 500 1km

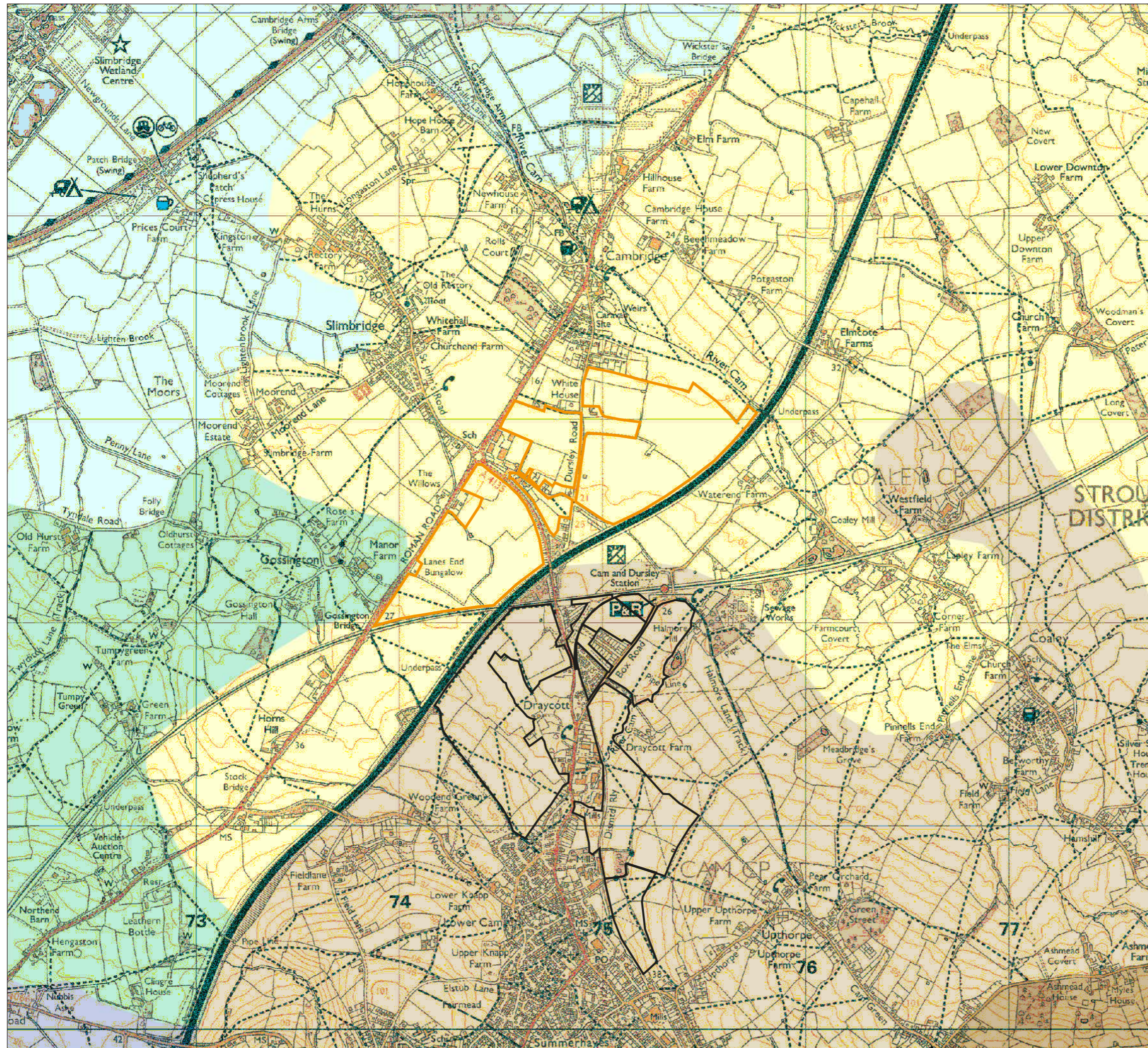


FIGURE 4
District Landscape Character



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Draft Allocation PS37 Wisloe, Stroud

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Legend

- Proposed New Settlement (Draft Policy PS37) (1,500 dwellings)
- Development Context (Refer to Figure 1)

Stroud District Landscape Assessment 2000 Landscape Character Types (LCT)

- LCT 5 Rolling Agricultural Plain
 - 5A Escarpment Footslopes
 - 5B Lowland Plain
- LCT 6 Undulating Lowlands
 - 6B Little Avon Mid-Valley
 - 6C Wooded Lowlands
- LCT 8 Severn Vale Grazing Marshes
- LCT 4 Escarpment



0 250 500 1km



FIGURE 5
Current Separation



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Draft Allocation PS37 Wisloe, Stroud

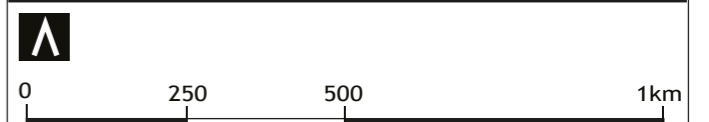
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January 2021

Legend

- SA3 Northeast Cam (Allocated in adopted LP)
- Existing Applications/ Development (Figure 1)
- 1.5 km (Distance along A4135 between Slimbridge & Cam SDL. Distance is less (960m) between Slimbridge and development north of Cam, immediately south of railway).
- 930 m (Distance along A38 between Gossington & Slimbridge).
- 460 m (Distance along A38 between Slimbridge & Cambridge. Distance between buildings in Wisloe Business Park and the southern edge of Cambridge is 240m).
- 800 m (Distance along Dursley / Wisloe Rd between Cambridge and 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.



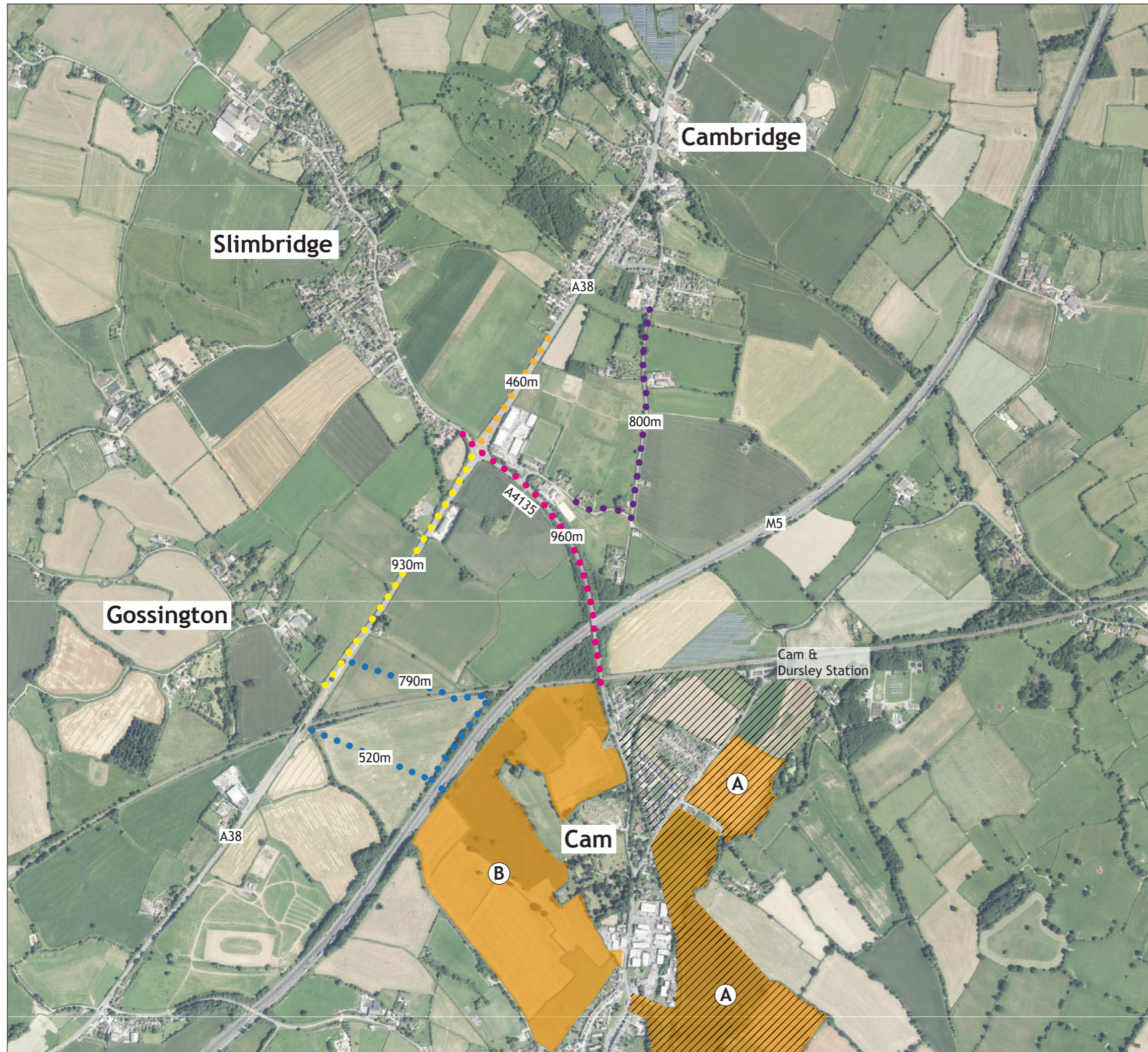


FIGURE 6
 Separation after Proposed
 Allocation: PS24



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 1167
 Draft Allocation PS37 Wisloe, Stroud

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 Wisloe Action Group

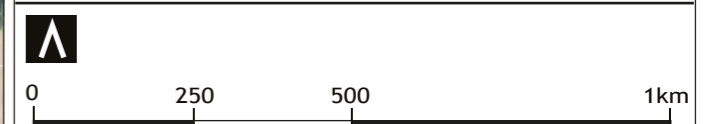
DATE
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Legend

- A SA3 Northeast Cam (Allocated in adopted LP)
- B Proposed Allocation (Policy PS24) (700 dwellings)
- Existing Applications/ Development (Figure 1)
- 960m (Distance along A4135 between Slimbridge & PS24 / Cam)
- 930 m (Distance along A38 between Gossington & Slimbridge).
- 460 m (Distance along A38 between Slimbridge & Cambridge. Distance between buildings in Wisloe Business Park and the southern edge of Cambridge is 240m).
- 800 m (Distance along Dursley / Wisloe Rd between 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 be unchanged.

All distances are approximate and measured from Google Earth.



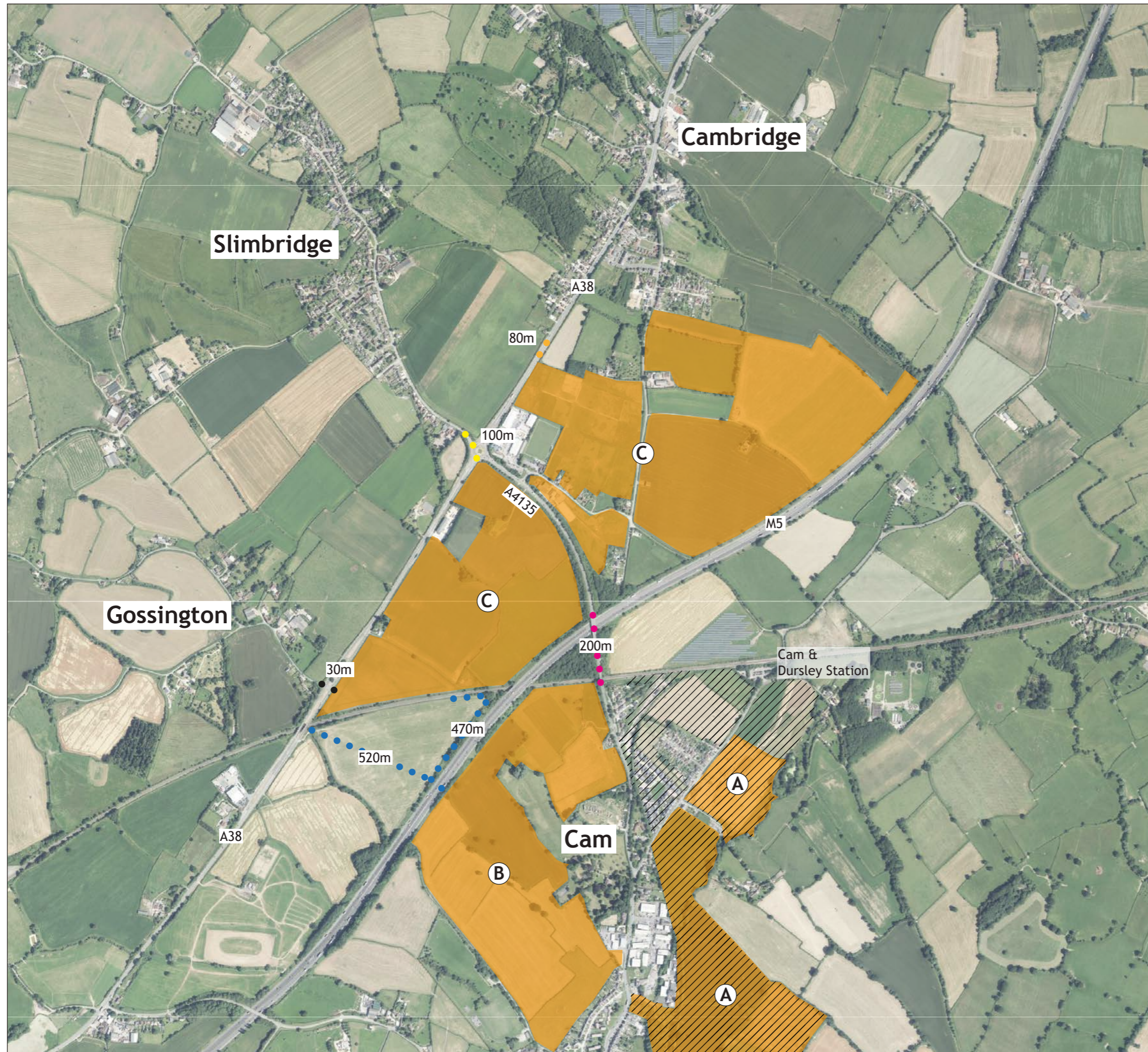


FIGURE 7
 Separation after Proposed
 Allocations: PS24 & PS37



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 1167
 Draft Allocation PS37 Wisloe, Stroud

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 Wisloe Action Group

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 January 2021

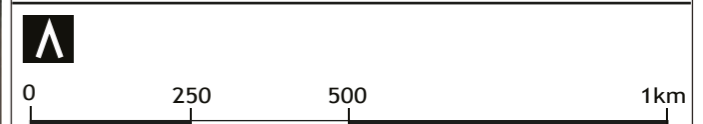
Legend

- A SA3 Northeast Cam (Allocated in adopted LP)
- B Proposed Allocation (Policy PS24) (700 dwellings)
- C Proposed Allocation (Policy PS37)(1,500 dwellings)
- Existing Applications/ Development (Figure 1)
- 200m (M5 and railway bridges) (Distance along A4135 between PS37 & PS24 / Cam)
- >100 m (the A38 roundabout) (Distance between PS37 & Slimbridge).
- 80 m (Distance along A38 between PS37 & Cambridge)
- 30 m (the width of A38) (Distance between PS37 & Gossington).
- 470 m (Distance along Fps 46 & 45 between PS37 & PS24 / Cam. Distance from Gossington Bridge to PS24 / Cam using Fp 45 and Byway 21 is 520 m)

No separation would remain along Dursley / Wisloe Rd between Cambridge and existing 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.

All distances are approximate and measured from Google Earth.



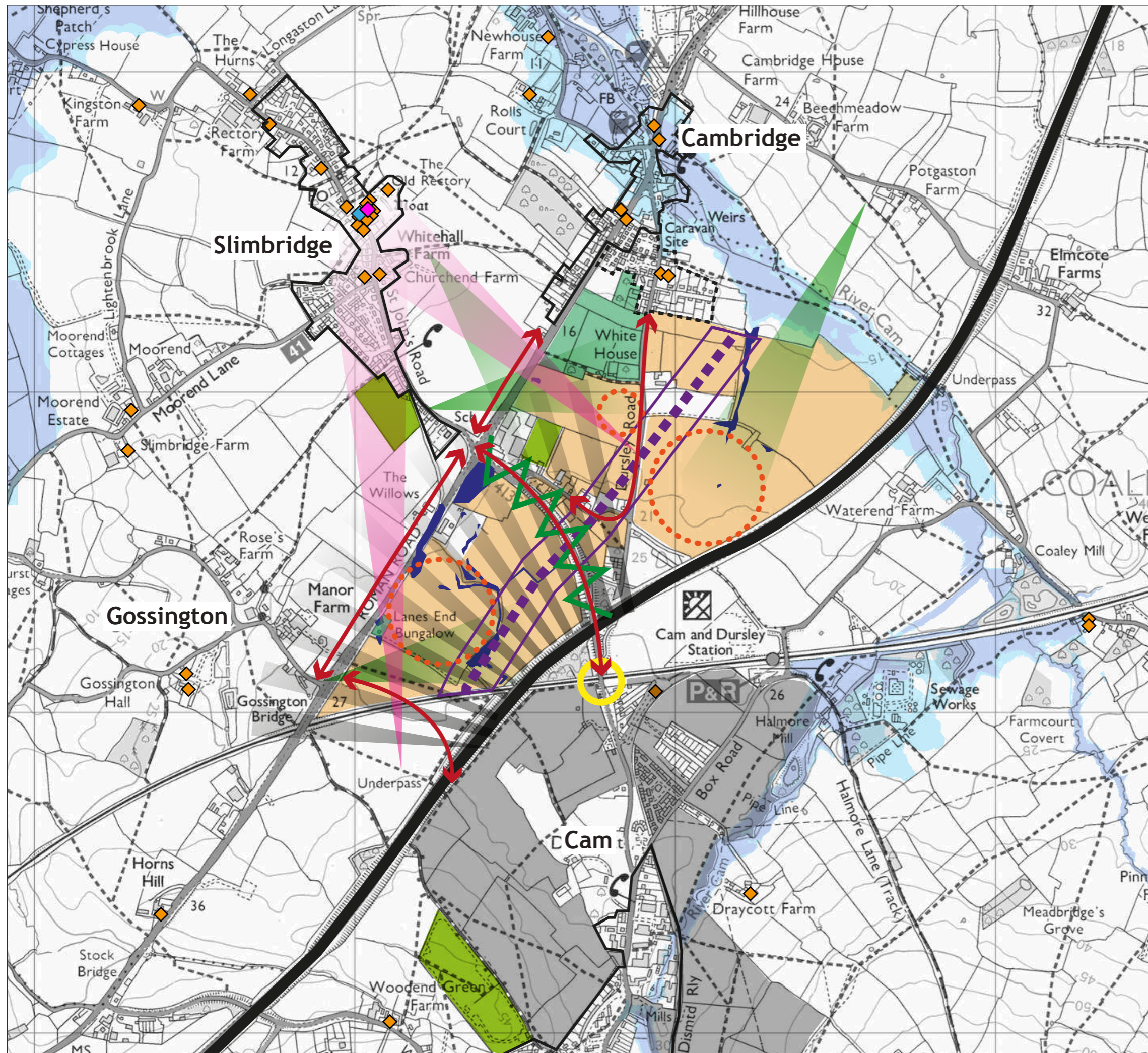


FIGURE 8
Constraints (PS37)



PROJECT
1167
Draft Allocation PS37 Wisloe, Stroud

CLIENT
Wisloe Action Group

DATE
January 2021

Legend

- Proposed New Settlement (Draft Policy PS37)
- Development Context (Refer to Figure 1)
- Settlement Development Limits (SDL) (LP)
- Land proposed to be included in SDL (Draft LP)
- Loss of Settlement Separation (Gossington/Slimbridge/Cambridge/Cam)
- A4135 on Embankment (Low Amenity & Barrier to Movement Across PS37)
- Visual Sensitivity (Views to 'Slimbridge Spire')
- Visual Sensitivity (Visual Coalescence & Characterful Views)
- M5 (Low Amenity & Barrier to Movement)
- M5 on Embankment (Increased Visual & Aural Impact over PS37 land)
- Gas Pipeline (Inner Zone, HSE Advise Against All Development)
- Gas Pipeline (Outer Zone, Edge of HSE Consultation Distance)
- Constrained Pedestrian/Cycle Access - Improved Connections to Station Required (PBA/Stantec).
- Susceptible to Flooding from Surface Water (EA)
- Flood Zone 3 (EA)
- Flood Zone 2 (EA)
- Land Not Promoted
- Protected Outdoor Play Space (Adopted LP)
- Potential Archaeology (Romano-British Settlement/Activity) (Cotswold Archaeology)
- Grade I
- Grade II*
- Grade II

PS37 is within 3km of Severn Estuary European Marine Site (EMS) containing SAC, SPA, Ramsar and SSSI designations. (Falls within 7.7km SDC mitigation zone)





Photograph A: Looking east across the southern parts of PS37 towards the Cotswold Escarpment from the A38 Gossington Junction





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



FIGURE 11



Photograph C: Looking north east from St John's Road towards the gap between the Business Park (A38 roundabout) and the southern edge of Cambridge





Photograph D: Looking north from Fp 45 towards Slimbridge Spire which is seen above the southern parts of PS37





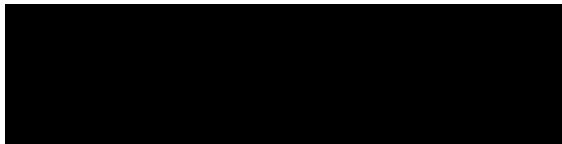
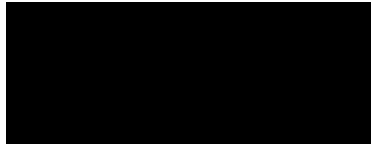


Michelle Bolger Expert Landscape Consultancy Ltd

Company Registration No. 09809868

VAT Registration No. 224 2598 12

Registered Office: 35 Pickford Road Bexleyheath DA7 4AG





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Representations on behalf of Slimbridge Parish Council

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