

**STROUD DISTRICT COUNCIL LOCAL PLAN REVIEW
EXAMINATION IN PUBLIC (EiP)**

MATTER 5 | NEW SETTLEMENT AT WISLOE

FEBRUARY 2023

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REPORT CONTROL

Project:	Kingswood and Whitminster
Report Type:	Hearing Statement - Wisloe
Client:	Redrow
Our Reference:	603/A5/MJK
Date:	13 th February 2023
Version:	V2

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1.0 LAND AT WISLOE – POLICY PS37

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

- 1.1 Although less of a peripheral location, our concerns in relation to the proposed allocation at Wisloe are similar to that raised in respect of Sharpness New Settlement (SNS). Garden Communities are very difficult and expensive to deliver, particularly to ensure that they are accessible and new residents have good access to forms of transport other than the private car. In respect of Wisloe its location near to Cam train station and the settlement of Cam/Dursley itself assists somewhat compared to Sharpness, but it is still important to have a costed plan for the delivery of supporting public transport improvements to ensure that this can be delivered alongside the other site wider infrastructure that will be required, and the development remain viable whilst delivering a policy compliant level of affordable housing.
- 1.2 Currently there is no detail in respect to viability to show how this can be achieved, and without that, major question marks remain as to how the development will meet the local plan’s vision, particularly with regard to the reduction in carbon emissions.

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

- 1.3 The Wisloe site is not being promoted by a developer which is concerning because it means that there has been no viability assessment of any kind undertaken by a body that actually delivers development projects. Furthermore, the absence of a developer means that the commercial attractiveness of the site is yet untested, and the presence of the nearby motorway may deter such interest.
- 1.4 The evidence submitted in support of this allocation is limited in terms of master planning work, being limited to conceptual drawings contained within EB96h, so it is very difficult to ascertain how the key garden city principles will be achieved. It is also very hard to ascertain if the development parcels shown on the plan contained in EB96h are of sufficient size to provide the quantum of development envisaged without requiring very high and inappropriate densities.
- 1.5 Our main concerns relate to how a new community can be practically delivered in the context of the significant constraints that the M5 and A38 pose, which inhibit good design in our view.

- 1.6 In terms of whether the 1,500 dwellings and 5ha of employment land can be delivered in the plan period, we would refer to our response to question 34.

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

- 1.7 SB96e sets out that several bus service options are being considered and these, unlike the Sharpness proposals, have some credence with providers such as Stagecoach. However, the viability of their delivery remains untested despite our previous representations highlighting this as a concern.
- 1.8 In terms of pedestrian and cycle links, the main issue with this site relates to the constraints that the M5 and A38 impose on it, making extensive linkages, particularly to the south more challenging. This is emphasised by the strategy plan contained in EB96h which doesn't show any significant links to the south other than the A4135.
- 1.9 The existing crossing of the M5 by the A4135 is an incredibly unattractive route for pedestrians and cycles as figure 1 shows.



Figure 1. A4135 Crossing the M5

- 1.10 It is very difficult to see how a high quality multi modal link to Cam and the train station can be delivered on this existing bridge, and no details of this important feature have been provided.
- 1.11 Grass Roots Planning has been promoting a large strategic site on the edge of Bristol with a similar issue and in that case we are proposing a new, separate, pedestrian/cycle bridge be installed to provide a much improved crossing for active travel purposes. We consider such an approach is essential here if the development is to be considered to be sustainable. In this other case, the bridge was costed at many millions of pounds and has to be delivered in the

first phase of development; we consider that the same should apply if the Wisloe new settlement were to proceed and the landowners should demonstrate how its early delivery would not affect the scheme's viability. We also suggest that the wording of policy PS37 should include a commitment to provide a multi-modal bridge, unless it can be proven that the existing bridge can be reengineered to accommodate this instead.

24c. Has the impact of the new settlement on the surrounding road network, including nearby motorway junctions, been adequately assessed? Can any impacts be mitigated and if so, how? Is the policy sufficiently positively worded in this regard, for example with reference to M5 junction 14?

- 1.12 There are well documented constraints that affect this junction and any large-scale development will exacerbate these issues. However, conversely, they also hold the key to the solution through a holistic approach to funding the junction improvements.
- 1.13 Therefore, the Council should be working with both GCC and National Highways to agree how all development that will affect this junction will contribute towards phased improvement works that can resolve the issues in a well-planned way.
- 1.14 This should include a new policy that requires development within a defined geographical area, which are of a scale that will materially affect the junction, to contribute towards holistic improvements.
- 1.15 The promoters of the PS37 allocation have not undertaken a detailed transport assessment to ascertain the exact impacts that the development will have on Junction 14 (SB96e is just an overview with no specific assessment) but given its scale and proximity it will likely have a significant impact.

24d. Will the location of the high pressure gas pipeline that runs through the site constrain the proposed development in anyway? What effect, if any, will the presence of the gas pipeline have on the viability of developing the site?

- 1.16 In respect to the evidence base that has been submitted in support of the allocation site we are not aware of any site specific viability assessment being undertaken by either the landowners or Stroud District Council. Paragraph 68 of the NPPF requires that '*planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability*'. No evidence has been supplied to meet the requirement that likely economic viability has been fully taken into account and our

experience of high pressure mains is they are extremely expensive to relocate, and if left in situ further constrain the site in terms of successful master planning.

- 1.17 The landowners could have undertaken a feasibility assessment of this issue in conjunction with Wales and West Utilities (WWU); currently, we are unclear on whether this has been completed. This process would confirm the new route, specification, costs of works and their likely timing and phasing. It would also involve consultation with the HSE in respect of consultation/exclusion zone connected to this infrastructure. Without this information, there is no certainty that this feature will not preclude development here via a number of means – costs, exclusion zones, feasibility etc.

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

- 1.18 As set out within our previous representations to the Pre-Submission Plan, little has been undertaken in respect to master planning work for this site, so it is extremely difficult to comment on this question other than to say the work undertaken provides no certainty that the site capacity has been properly assessed and the quantum of development proposed is reasonable, taking into account the need to provide buffers to the motorway, strategic greenspace to meet garden settlement principles and the need to provide at least 10% BNG.

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

- 1.19 The housing delivery expectations set out at page 306 of the Local Plan are not credible. They assume that Wisloe will deliver houses by 2025, which is simply not possible. There are currently no planning applications submitted for the site and, as we have explained in respect of Sharpness, even in an optimistic scenario it will be at least 6 years before there are any completions on this site (see reference to Lichfield – ‘Start to Finish’ paper). As there is no developer partner or promoter secured to deliver this site yet, this time frame is likely to be much longer as contracts will need to be negotiated and signed before an outline planning application is even prepared.
- 1.20 Therefore, we consider that the trajectory for this site needs to be pushed back at least 8 years and at least 225 dwellings removed from the plan period.



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