



SALA SITES WHICH FORM THE WISLOE NEW SETTLEMENT PROPOSAL

Stroud Local Plan Review (Regulation 19) Representations

Client: Slimbridge Parish Council

1624/02
14/06/2021

1:15,000 @ A3

metres 500



jb planning associates
town planning
and development
consultants
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Chells Manor, Chells Lane
STEVENAGE, SG2 7AA

T 01438 312130

info@jbplanning.com
www.jbplanning.com

Slimbridge Parish Council

Tel: 07943 894637
E-mail: clerk@slimbridge-pc.gov.uk
Website: www.slimbridge-pc.gov.uk

January 2019

Dear Sirs,

Please find the following objections of Slimbridge Parish Council with regards to the Local Plan Review Consultation.

Slimbridge Parish as a whole

Slimbridge Parish is one whole parish that includes the villages of Slimbridge and Cambridge plus the hamlets of Gossington, Troytown, Kingston, Moorend, Shepherds Patch and Tumpy Green. Stroud District Council (SDC) advertising 'Wisloe Green' as a separate entity is completely wrong, this will be situated in the Parish of Slimbridge, and therefore part of Slimbridge Parish.

Merging of villages

The proposed development will potentially result in merging the parish of Slimbridge and the Parish of Cam into one urban sprawl with potentially only the motorway acting as a buffer. This will take the individual identities of each parish away losing their uniqueness in the countryside. SDC Local Plan states "*The countryside in some locations may be important to avoid the coalescence of towns and villages and to retain their individual character. These areas should be protected to retain visual and physical separation*". This will lose the character of the locality. This goes against SDC Local Plan policy ES13 which states "*Development proposals shall not involve the whole or partial loss of open space within settlements, ... within or relating to settlements. There should be no harm to spaces which contribute to the distinctive form, character and setting of a settlement*". There needs to be a significant green barrier between parishes and any new development to ensure the historic identity and individuality of each area is retained.

Tiers

In relation to Slimbridge and Cambridge, 'Wisloe Green' will be a large development 3 times the size of the whole parish of Slimbridge. This is out of proportion for the parish and will be unsustainable to the local environment. Cambridge is in Tier 5 (after just being moved down a tier) of SDC Local plan and Slimbridge is Tier 3.

In SDC Local Plan, Tier 5 states "*These remaining settlements have a lack of basic facilities to meet day to day requirements. However, there could be scope for very limited development, should this be required to meet a specific need identified by these communities in any Neighbourhood Plans*"; and Tier 3 states "*These villages possess a limited level of facilities and services that, together with improved local employment, provide the best opportunities outside the Local Service Centres for greater self-containment. They will provide for lesser levels of development in order to safeguard their role and to provide through any Neighbourhood Plans some opportunities for growth and to deliver affordable housing.*"

Both descriptions of the tiers should therefore rule out a 1500 house development within the parish.

Land usage

The land usage for the proposed development goes against the National Planning Policy Framework (NPPF) which states (Chapter 11 p117) *“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions”*. The impact of 1500 houses in a small rural parish will not be safeguarding nor improving the environment. Instead it will have damaging effects on the local wildlife especially in terms of the local Wildfowl and Wetlands Trust where migrating birds go annually. SDC Local Plan states (*“Protection for all wild birds is required under the EU Wild Birds Directive. The Wildlife and Countryside Act 1981 (as amended) (“The Act”) provides similar protection for other animal and plant species that are rare in Great Britain, such as water voles. It also protects all wild birds in Great Britain, their eggs and active nests. Some species are protected from persecution (such as badgers) or from hunting or harvesting in an excessive or cruel way (such as game birds and deer). Offences under The Act in relation to the obstruction/disturbance of places used for shelter or protection, or the sale of said species, also apply to European Protected Species.”*) Therefore, any development will need to carry out all relevant surveys on this matter and mitigate against harm caused by development.

SDC Strategy for Avoidance of Likely Adverse Effects on the Severn Estuary SAC, SPA, and Ramsar Site states that *“developments resulting in a net increase of one dwelling or more within a 3km visitor catchment must either contribute to the funding of specific projects set out in the Strategy or provide their own bespoke impact avoidance measures. Costs are on a per-dwelling basis and are collected through unilateral s106 contributions.”* This would involve a significant contribution from the developers in either providing impact avoidance measures for the area or funding towards specific projects. If this occurs, then Slimbridge Parish should have a significant say in where the monies are spent and on what projects.

The land being proposed to be built on is good agricultural land. The NPPF states (Chapter 17, p170b) *“Planning policies and decisions should contribute to and enhance the natural and local environment by:*

“protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan”.

Building on good agricultural land would mean a loss of potential economic resources of growing food and also that of local jobs for local people.

The land being proposed is of Grade 2 which is deemed very good, and therefore should not be considered in the Local Plan review as acceptable for development. The below link demonstrates this with a map, clicking on South West

<http://publications.naturalengland.org.uk/category/5954148537204736>

Traffic and roads infrastructure

The additional traffic will also not provide a safe environment with additional pollution and lack of infrastructure to promote safe walking, cycling, horse riding and access to public transport according to Chapter 9 of the NPPF *“Promoting Sustainable Transport”*. Whilst Cam and Dursley train station is only a short distance away, this is not safely accessible by foot and this would have to be addressed to provide those means of accessibility.

Sewerage infrastructure

Slimbridge Parish has suffered from years of insufficient sewage capacity with evidence of much flooding in the past. Over the past number of years, the Parish Council have been working with Severn Trent Water (STW), to resolve this issue. STW have recently completed a significant amount of work which is hoped to mostly resolve the worst of the flooding. However, this is on a 3 year

monitoring programme to assess this based on the current housing numbers. 1500 houses will not be able to join the sewage network unless further significant work is undertaken to guarantee that the current parish housing will not suffer from further sewage issues due to 1500 houses joining the network. This proposal will go against SDC policy CP14 p 3 & 4. *“Development will be supported where it achieves the following: 3. Adequate water supply, foul drainage and sewage capacity to serve the development and satisfactory provision of other utilities, transport and community infrastructure 4. No increased risk of flooding on or off the site, and inclusion of measures to reduce the causes and impacts of flooding as a consequence of that development.”* This issue is also raised in the Slimbridge Village Design Statement (SVDS) stated in policies SEI 1

Noise and intrusion

The NPPF states (Chapter 15 p180) *“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: mitigate and reduce to a minimum potential adverse impact resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.”* The location of the proposal will mean that a significant amount of housing will be situated next to the motorway; which will advertently come with noise and air pollution.

Amendment of parish boundaries

It has been noted the potential change to the village envelope incorporating Narles Road and Bartons Field. Bartons Field was built on as an exception site for affordable housing for the parish which also met the needs of surrounding parishes. By including this in a new parish envelope it would lose its status as an exception site allowing potential land next to this to then be designated as such, opening up the threat to further development in the countryside.

Visual impact

Slimbridge Parish, whilst not located in the AONB, is viewed from the AONB from a number of viewpoints. As stated in the SVDS, the St Johns Church steeple can be seen from quite a distance. The impact of 1500 houses will have a significant impact on this view from all visual points. Strategic Objective SO6 in SDC Local Plan states *“The strategy seeks to minimise the impact of development on biodiversity and sensitive landscapes by prioritising sites that lie outside the Cotswolds AONB or the protected landscapes of the River Severn estuary.”*

Alternative sites

It is noted the two alternative sites are still in the revised Local Plan. Any development on the Glebe fields (site SLI001) will merge the villages of Slimbridge and Cambridge together, once again in contrary to SDC policies on merging villages where identity and characteristics will be lost. Slimbridge Parish Council may consider growth on the site of SLI003


Slimbridge Parish Clerk
January 2019

Slimbridge Parish Council

23 Tennyson Road, Dursley, Glos, GL11 4PZ

Tel: 07943 894637

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

Website: www.slimbridge-pc.gov.uk

January 2020

Slimbridge Parish Council recognises the constraints put on Stroud District Council by the Government to provide housing within the district; however, there are a number of objections from Slimbridge Parish Council with regards to the Local Plan Review Consultation and the impact this would have on the Parish of Slimbridge.

Slimbridge Parish is a medium sized rural parish in Gloucestershire which has a population of 1210 people (Mid-year estimates ONS 2017), covering just under 500 dwellings. Whilst small growth has occurred over the years, this has had minimal impact on the rural environment of this locality, with the area retaining a strong village identity. The countryside location with the views around ensure the feel of a traditional village with surrounding hamlets connected via country lanes and a network of Public Rights of Way.

Slimbridge Parish as a whole

Slimbridge Parish is one whole parish that includes the main villages of Slimbridge and Cambridge plus the hamlets of Gossington, Troytown, Kingston, Moorend, Shepherds Patch and Tumpy Green. Stroud District Council (SDC) advertising 'Wisloe Green' as a separate entity is completely wrong, this will be situated in the Parish of Slimbridge, and therefore part of Slimbridge Parish.

Tiers

In relation to Slimbridge and Cambridge, 'Wisloe Green' will be a large development 3 times the size of the whole parish of Slimbridge. This is out of proportion for the parish and will be unsustainable to the local environment. Cambridge is in Tier 4a of SDC Local plan, and Slimbridge is Tier 3b. Both of these tiers have been altered and re-categorised. (previously: Slimbridge 3 and Cambridge 5) In SDC Local Plan Review, Tier 3b states *"These small and medium sized rural villages 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"* and tier 4a states *"These small and very small villages provide a limited range of services and facilities for their communities. ... These settlements are relatively less sustainable locations for growth, ..., and most face significant environmental constraints"*

Within Slimbridge parish both descriptions of the tiers state that there are *"significant environmental constraints for growth"* therefore, this should demonstrate that growth within the Parish of Slimbridge of a proposed 1500 houses would have environmental damage to the area in a number of aspects. This goes against the tier descriptions Stroud District Council are proposing in their review.

Merging of villages

The proposed land allocation and development will potentially result in merging the Parish of Slimbridge and the Parish of Cam into one urban sprawl with only the motorway acting as a buffer. This will take the individual identities of each parish away, losing their uniqueness in the countryside.

SDC Local Plan 2015 states *“The countryside in some locations may be important to avoid the coalescence of towns and villages and to retain their individual character. These areas should be protected to retain visual and physical separation”*. This will lose the character of the locality. This goes against SDC Local Plan policy ES13 which states *“Development proposals shall not involve the whole or partial loss of open space within settlements, ... within or relating to settlements. There should be no harm to spaces which contribute to the distinctive form, character and setting of a settlement”*.

The Local Plan Review (Nov 2019) policy HC1 states *“on edge of settlement sites, the proposal would not appear as an intrusion into the countryside, would be sympathetic in scale and location to the form and character of the settlement, would not lead to coalescence with other hamlets or settlements and would retain a sense of transition between the open countryside and the existing settlement’s core”* Furthermore, the same policy also talks about new housing development should not cause the loss of, or damage to, any open space which is important to the character of the settlement or result in the loss of locally valued habitat which supports wildlife. If the Wisloe site goes ahead, it will do just this. The proposed land allocation for Wisloe development would also be of a scale, density, layout and design that is incompatible with the character, appearance and amenity of the Parish of Slimbridge in which it would be located, and the density proposed is not acceptable within this rural location.

There needs to be a significant green barrier between parishes and any new development to ensure the historic identity and individuality of each area is retained.

This is supported by the Slimbridge Village Design Statement 2016 stating in the key objectives and guidelines:

“Slimbridge Landscape and Natural Environment (SLN) Key Objectives: To conserve the identity of the separate villages of Slimbridge and Cambridge and the smaller hamlets surrounding these. The open and rural nature of the area should be conserved and encouragement for the natural environment to be preserved.

SLN 2 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. Relating to policy CP15 in the Local Plan referring to quality living and working in the countryside; and ES12 as this refers to site appraisal using local design statements and ensuring design and access statements.”

Slimbridge Cllrs support the inclusion of the South of Hardwicke site, which would deliver approximately 1200 houses. This would be an extension of an already urbanised area and wouldn't be out of character for this locality. This could then eliminate or significantly reduce the need for the development in Slimbridge. The Hardwicke site is physically well-related to an existing settlement, whereas the proposed Wisloe Green site is separate and will encourage merging of communities of Cam and Slimbridge with an impact of losing individual identities. In previous responses Slimbridge did support a much smaller site by Tynning Crescent which would fall in line with the public's preferred option for dispersal of houses in the Local Plan.

With no Role and Function study done on the Wisloe site due to its late submission, it is located within the parish of Slimbridge. Both Slimbridge and Cambridge have been included in the Stroud District Role and Function study 2018 and it states that both areas have no significant employment role, with residents working within 2km of home being low compared to the rest of the district, with the most common workplaces being Gloucester, Bristol/ South Glos and Cheltenham thus demonstrating that the majority travel outside the parish for employment.

It is noted that the Wisloe allocation is made up of 3 separate sites and were assessed individually in 2018, whereas in fact they should be assessed as one site with consideration to the impacts this has on landscape characteristics and coalescence with surrounding parishes such as Cam. With this site merging with Cam, the possible housing allocation would be in excess of 3000, so again this should be assessed as one large site to look at effects on infrastructure and all the mentioned issues within this objection.

Land usage

The land usage for the proposed development goes against the National Planning Policy Framework (NPPF) which states (Chapter 11 p117) *“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions”*. The impact of 1500 houses in a small rural parish will not be safeguarding nor improving the environment. Instead it will have damaging effects on the local wildlife especially in terms of the local Wildfowl and Wetlands Trust where migrating birds go annually. SDC Local Plan states (*“Protection for all wild birds is required under the EU Wild Birds Directive. The Wildlife and Countryside Act 1981 (as amended) (“The Act”) provides similar protection for other animal and plant species that are rare in Great Britain, such as water voles. It also protects all wild birds in Great Britain, their eggs and active nests. Some species are protected from persecution (such as badgers) or from hunting or harvesting in an excessive or cruel way (such as game birds and deer). Offences under The Act in relation to the obstruction/disturbance of places used for shelter or protection, or the sale of said species, also apply to European Protected Species.”*) Therefore, any development will need to carry out all relevant surveys on this matter and mitigate against harm caused by development.

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The land being proposed to be built on is good agricultural land.

Building on good agricultural land would mean a loss of potential economic resources of growing food and also that of local jobs for local people.

NPPF (Chapter 15 170b) states *“recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”*

The land being proposed has been used for farming for many years, and therefore should not be considered in the Local Plan review as acceptable for development. This also goes against SDC new proposed policy DCP1 which states that all new development must be *“designed to maximise green infrastructure to sequester carbon and to support local food production”* as building on agricultural

land that is capable of growing food does not support food production. It also contradicts the Stroud District's CN2030 policies to *"Protect the most productive agricultural land to allow conversation to production of crops for local consumption"* as the development will be built on good farmland with people having to travel resulting in greater exhaust emissions and commuter miles from those needing to access supermarkets for food instead of potentially purchasing local food grown from local sources.

Should it be that the land has degraded, then Stroud DC should be looking at Campaign to Protect Rural England's policies on restoring the soils health in their document *"Back to the land: rethinking our approach to soil"*. Within the Stroud CN2030 action plan, it states Stroud DC should *"incentivise good soil management practices that enhance soil's ability to deliver environmental benefits through future environmental land management schemes"*

Slimbridge Parish Council have noted the research done by Wisloe Action Group in this matter and support their findings and the fact that further independent soil surveys should be undertaken again.

"Farming has always played the central role in making the countryside what it is and the loss of a diversity of farm sizes threatens detrimental consequences for the economic, social and environmental health of the countryside". (CPRE, Does the loss of farms matter? 2017)

Traffic and roads infrastructure

The A38 is a major transport route through the Parish of Slimbridge connecting commuters to Gloucester or Bristol and the M5. Junctions 13 and 14 of the M5 are already either close to or at capacity (as noted in Highways and Transport Overview commissioned by Ernest Cook Trust and Gloucestershire County Council), and significant improvements are required to accommodate the additional vehicles from not only this development but also Sharpness, Hardwicke and further into the South of Gloucestershire as this particular network of roads are used by all. The A38 has multiple speed limits along the stretch, therefore where development is proposed, to ensure safe connectivity and to promote cohesion between the communities, the speed limits should reflect this requirement and be reduced to benefit the environment.

The additional traffic will also not provide a safe environment with additional pollution and lack of infrastructure to promote safe walking, cycling, horse riding and access to public transport according to Chapter 9 of the NPPF 2019 *"Promoting Sustainable Transport"*. This policy goes on to state that *"transport issues should be considered from the earliest stages of plan-making"*, and that the scale, location and density of development should reflect *"opportunities from existing or proposed transport infrastructure"*; Also to help reduce congestion and emissions and improve air quality and public health the planning system should focus significant development *"on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."*

Despite SDC Local Plan review policy DCP1 stating developments should be *"designed to discourage the use of the private car, irrespective of fuel source, by prioritising in order of importance: walking, cycling and public transport"* there is no evidence to suggest how this will be enforced or done within this development. Slimbridge Parish currently has only 6% of households that have no car compared with 26% across England (Gloucestershire County Council Inform Parish Profile 2019). The proposed development will still be situated just off the A38 in the middle of commuting routes either side to larger cities of Gloucester and Bristol. There is no evidence to suggest that employment land being provided will be able to meet the needs of the new residents (potentially at least 3000 based on 2 working adults per household). The new houses are still likely to have a high car ownership rate, with the current rate in Slimbridge of 44% of homes having 2 cars compared

with 25% across England with 2 cars. Should any development go ahead then all houses should have a minimum of 2 car parking spaces off-road each. In line with Stroud's Carbon Neutral policies, each house should also have electric charging points for cars. Should development bring a new school, this will also need its own car park to accommodate parents dropping off and picking up so as to prevent the congestion that is so common around rural schools in small areas with the current primary school in Slimbridge as a prime example.

Whilst Cam and Dursley train station is only a short distance away, this is not safely accessible by foot or bicycle, and this would have to be addressed to provide those means of accessibility. The Cam and Dursley train station provides invaluable links to Bristol, Gloucester, Cardiff and Bath and with increased development in Cam this is being used more. However, the train station can only accommodate a limited number of carriages due to the size of the platforms and the car park is often full. This means parked vehicles are spreading out onto the road network (Box Road in Cam), creating congestion on the neighbouring roads which are not able to manage the additional traffic. This will only get worse with the Wisloe allocation and further development being proposed in Cam. Significant improvements are required in the upgrading of the station capacity, facilities and road infrastructure to cope with this.

Improved transport links are vital and would be welcomed as a priority to ensure safer routes are put in place to ensure those who walk and cycle can do so safely. This could be in the form of upgrades to the bridge on the A4135 over the railway, or an additional bridge over the motorway to create these links. It is noted that the Role and Functions study 2018 states that Cambridge has "good" accessibility to key services, this is not the case as there is no safe walking or cycling route to Cam, which therefore puts pressure on the use of cars to access these services. What will be done to ensure more buses and routes will be available to encourage use of public transport? A bus service to WWT would be beneficial to alleviate the mass of traffic that can only access this popular tourist site via the one country road in and out of the rural village of Slimbridge. The only bus service available runs through the A38; will buses be encouraged to have stops in the new development and also within the villages and hamlet around to promote public transport?

In the Stroud District Sustainable Transport Strategy it states that the average commute is 17km with essential services some distance away, this demonstrates why there is a high proportion of car owners in the area as reliance on the car is an essential mode of transport when there is limited other means of reliable and accessible public transport. The proposed location is in an area of relatively low employment opportunities and therefore it is likely to remain a dormitory location with people having to travel outwards to work - all of this contradicting Stroud DC's CN2030 policies.

To be included with the improved transport links should be The Dursley and Uley Greenway which is a publicly supported project with the aim to connect Uley through to Slimbridge and on to the National Sustrans Cycle Route (41) at the canal. This would take in the Cam and Dursley train station on route providing vital links.

Amenities and facilities:

How will Stroud District Council ensure that the development will bring forward facilities such as schools, doctors etc to accommodate the needs of the development?; already, everyone in the parish has to travel out of the area to access these services with only the post office and school within Slimbridge accessible on foot within a 15 minute time period. All other services are much longer to access if using public transport or are not safely accessible on foot or bicycle due to the nature of the road network. At what point will facilities such as schools, medical facilities, shops etc be built and functional within the development? – will this be too late with those moving into houses registering themselves at schools and doctors in neighbouring parishes, congesting these up

further, and having to be accessed via car? Infrastructure has to be built earlier in the development to have any chance of people reducing their car usage in line with CN2030 policies

Sewerage infrastructure, flooding and water quality

Slimbridge Parish has suffered from years of insufficient sewage capacity with much evidence of flooding in the past. Over the past number of years, the Parish Council have been working with Severn Trent Water (STW), to resolve this issue. This has involved much community consultation and working with the Parish Council, which resulted in STW undergoing several modelling exercises to understand the issues and how it could be addressed. Works were then undertaken by STW and Gloucestershire Highways upgrading the facilities (replacing them would have been ideal but this would have cost much more). There is now a 3year monitoring programme in place to see how these upgrades are coping and what may need to be done more of in the future. Wisloe Action Group have also gone into detail of the works, time and community involvement that was required to get this far in the process. This work has only reduced the risks not eliminated them.

The above works were done to manage the issues of the current housing within the parish, an additional 1500 houses will not be able to join the sewage network unless further significant work is undertaken to guarantee that the current parish housing will not suffer from further sewage issues due to 1500 houses joining the network. This proposal will go against SDC policy CP14 p 3 & 4. *“Development will be supported where it achieves the following: 3. Adequate water supply, foul drainage and sewage capacity to serve the development and satisfactory provision of other utilities, transport and community infrastructure 4. No increased risk of flooding on or off the site, and inclusion of measures to reduce the causes and impacts of flooding as a consequence of that development.”* This issue is also raised in the Slimbridge Village Design Statement (SVDS) stated in policies SEI 1

The fields being proposed for allocation currently hold the rainwater to some extent with reports being received, even this month, of fields flooded at this time. How will the flooding from the rainwater be mitigated with all the development? The Parish has a number of ditch networks that also assist in managing the run-off water; what will be done to ensure these are maintained and sufficient systems put in place to guarantee that the proposed development and the surrounding areas will not be affected by flooding? The desk based exercise currently carried out is nowhere near sufficient to comprehend the flooding issues within the parish and what the fields proposed for development hold when weather is torrential, and the impact this will have of water run off in the parish if these fields are developed.

Cambridge residents already receive flood warning on a regular basis with the most recent being earlier this month, again demonstrating the potential flooding issues within the parish, none of which have been mentioned or addressed within this site assessment of Wisloe situated in the Parish of Slimbridge. The River Cam, many years ago, had an improvement scheme undertaken taking into consideration the houses at the time to assist in flood alleviation; it is doubtful that further full surveys, other than desktop surveys, have been completed in this area to assess the impact 1500 houses would have on the River Cam and its capabilities of taking on so much water run off from this.

It is noted that there is potential for adverse impact on water quality in the area in relation to the Wisloe proposal, this is very concerning with the addition of not only Wisloe but the surrounding proposals in Cam too. The concerns addressed in the Wisloe Action Group report are supported by Slimbridge Parish Council

Noise and pollution

The NPPF states (Chapter 15 p180) *“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: mitigate and reduce to a minimum potential adverse impact resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.”* The location of the proposal will mean that a significant amount of housing will be situated next to the motorway; which will advertently come with noise and air pollution.

Whilst noise impact assessments and air quality assessments have been carried out on the sites, this is not conclusive as the site layout is not known should any development go ahead, however initial indications are that mitigation will be required and some of this includes how the houses are built and requiring windows to be kept shut to eliminate noise with the houses having suitable ventilation built in.

Wildlife impacts

Information gathered from GCER by Slimbridge Parish Council for the Village Design Statement showed there are a number of species of wildlife in the area, including bats and newts. The destruction of this area for housing will destroy all the habitats and change the biodiversity of the area completely. Much mitigation in providing wildlife areas within the development would be required. Also, the development on the land could have adverse impacts on the many birds that migrate to the area, many accessing WWT as their local environment.

Amendment of parish boundaries

It has been noted the potential change to the village envelope incorporating Narles Road and Bartons Field. Bartons Field was built on as an exception site for affordable housing for the parish, which also met the needs of surrounding parishes. By including this in a new parish envelope, it would lose its status as an exception site allowing potential land next to this to then be designated as such, opening up the threat to further development in the countryside. Slimbridge Parish Council object to this extension of the village envelope and request to have it removed.

Visual impact

Slimbridge Parish, whilst not located within the AONB, is viewed from the AONB from a number of viewpoints. As stated in the Slimbridge VDS, the St Johns Church steeple can be seen from quite a distance. The impact of 1500 houses will have a significant impact on this view from all visual points. Strategic Objective SO6 in first consultation round of SDC Local Plan stated, *“the strategy seeks to minimise the impact of development on biodiversity and sensitive landscapes by prioritising sites that lie outside the Cotswolds AONB or the protected landscapes of the River Severn estuary.”* It is disappointing to see this has been changed, as parts of Slimbridge very much lies on the River Severn Estuary, and the landscape of this area will significantly change with 1500 house being proposed and could, therefore, have a damaging effect on the biodiversity, heritage and landscape of the parish.

Ernest Cook Trust

The selling off of land from The Ernest Cook Trust for such a huge potential development on greenfield land is disappointing. This goes against the principles of Ernest Cook with their website quoting that Ernest Cook’s aims were preserving not only buildings and landscape, but the social, economic, architectural and environmental elements of rural life. By creating an urban sprawl in the open countryside goes against this original ethos.

The percentage of people who work in agriculture in Slimbridge Parish is 9%, which is well above the district average. By selling off agricultural land, employment will be lost in this sector.

Conclusion:

In conclusion, Slimbridge Parish Council objects to this proposal of land allocation for this amount of housing development in a rural parish.



To: Stroud District Council
 From: Wisloe Action Group (WAG)
 Date: 21st January 2020 (Hand Delivered)
 Subject: Wisloe Action Group's (WAG) Response to Stroud District Council's Draft Local Plan Consultation

WISLOE ACTION GROUP

The Wisloe Action Group was formed to help represent our community's views in response to Stroud District Council's Draft Local Plan public consultation process.

Local people are deeply concerned about Stroud District Council's proposals in their draft Local Plan for a so called 'growth point' in the Slimbridge Parish. Stroud District Council and the developers jointly refer to the site as Wisloe Green, a new "Garden Village", which joins Cambridge, Gossington and Slimbridge together with Cam.

WAG (and Parish Council meetings) have been extremely well supported by Slimbridge Residents. A significant proportion of the community have been actively engaged throughout the consultation process and will continue to support WAG after the consultation period to ensure the proposed site is excluded from the Local Plan.

WISLOE ACTION GROUP'S POSITION ON THE DRAFT LOCAL PLAN

- The Wisloe Action Group does not support Stroud District Council's preferred strategy for meeting Stroud District's future growth and development needs.
- There are significant issues and constraints relating to the proposed development within Slimbridge Parish which are outlined in this response and the impact of these cannot be mitigated.
- The proposed Slimbridge Parish development does not meet site assessment criteria and is not a sustainable site.
- Sustainable dispersal was the view of the people and the Draft Local Plan does not reflect this. The proposed Slimbridge site was submitted at a late stage in the process and Stroud District Planners appear to have gone above and beyond to gather evidence to support their view to include the site rather than properly assess the site on its lack of sustainable credentials.

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38.	Air Quality
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42.	Heritage
47.	Identifying Suitable Alternative Sites
50.	Water Quality
51.	Executive Summary

SITE SELECTION

The site proposed within Slimbridge Parish (Wisloe) was not in the original 2017 consultation and therefore has not been selected in an evidence-based manner. Stroud District Council (SDC) selected Wisloe as a preferred site only after the Ernest Cook Trust (ECT) along with Gloucester County Council proposed the development. Stroud District Council (SDC), with the support of ECT and GCC then built an evidence base to support their preferences. Residents feedback and preference for dispersal has been ignored as have many of SDC's statements within the 2017 consultation. Proof of this is that many alternative and more suitable sites have been rejected without assessment as they are lower Tier settlements as are both Cambridge (Tier 4) and Slimbridge (Tier 3b). On this basis the proposed Slimbridge site (Wisloe) should either not be considered and all lower Tier Settlements should be reassessed by SDC. Furthermore, this development does not meet many of SDC's own sustainability objectives.

SDC's Sustainability Appraisal Report 2019 has a number of objectives:

SA 5.2: Does the Plan help to improve the satisfaction of people with their neighbourhoods as places to live and encourage ownership? Villagers in Cambridge, Gossington and Slimbridge are appalled at the prospect of being subsumed into one large development and a number are considering selling up.

SA 5.3: Does the Plan safeguard and enhance the identity of the District's existing communities and settlements? The plan will destroy the identity of Cambridge, Gossington and Slimbridge

SA 8.1: Does the Plan protect and enhance the District's sensitive and special landscapes (including the Cotswolds AONB), and townscapes? The creation of an extended conurbation from Dursley, through Cam and Wisloe to Slimbridge will create a blot on the landscape for any views across the Severn Vale from the AONBs.

SA 8.2: Does the Plan prohibit inappropriate development that will have an adverse effect on the character of the District's countryside and settlements? No it does not, its will destroy the character and existing settlements.

SA 8.3: Does the Plan promote the accessibility of the District's countryside in a sustainable and well-managed manner? No. The increase in local traffic around the A4135 and A38 will reduce accessibility.

SA 8.4: Does the Plan prevent coalescence between settlements? No. Slimbridge, Cambridge and Gossington will be joined to Cam and therefore Dursley.

SA 8.5: Does the Plan protect and enhance the District's natural environment assets (including parks and green spaces, common land, woodland and forest reserves) public realm? No. It destroys Grade 2 agricultural land that provides an open green space between current settlements and the motorway.

SA 13.1: Does the Plan encourage the appropriate provision of housing development on previously developed land as opposed to greenfield sites? No. The proposed development is planned to be built on Grade 2 agricultural land.

SA 13.5: Does the Plan reduce the loss of soil and high grade agricultural land to development? No. The proposed development is planned to be built on Grade 2 agricultural land.

The Strategic Assessment of Land Availability (SALA) Methodology February 2016 defines the process for identifying and assessing sites suitable for development.

Site submissions

Section 4.6. states:

All submissions will require the completion of a Site Submission Form, setting out the key information required, available as a downloadable proforma (Appendix C) on the Council's Consultation Hub during the Call for Sites period. An individual submission is required for each site submitted and will need to be accompanied by a site location plan, on an Ordnance Survey base, clearly identifying the site boundaries and access to the site.

From the evidence on the SDC website, this process was not followed. The submission for all the Wisloe sites consisted of one e mail from GCC and two maps, one each for the GCC and ECT land.

Site assessments

The three sites that make up the proposed Slimbridge site (Wisloe) have references SLI002 (GCC land), SLI004 (ECT land) and SLI005 (ECT land). Each site was assessed individually in 2018 as having future potential.

All three assessments dismissed or did not consider major issues in line with the following SALA principles.

In addition, the following factors will be considered to assess a site's suitability for development now or in the future:

- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;*
- potential impacts including the effect upon landscape features, nature and heritage conservation, and impact on the existing transport network (including rail);*
- appropriateness and likely market attractiveness for the type of development proposed;*
- contribution to regeneration priority areas;*
- environmental/ amenity impacts experienced by would be occupiers and neighbours.*

The only references to these factors were that proximity to the M5/A38/A4135/railway may result in noise and visual amenity issues which would require mitigation.

The reality is that there **will be** noise issues which will be difficult to mitigate.

There was no reference to air pollution, impact on landscape, infrastructure, environment.

The three locations should have been assessed as one with full consideration of all the factors and particularly the impact on the landscape and it is subsuming Slimbridge, Cambridge and Gossington into one large site.

No consideration has been given to the further impact of the coalescence with the extension of Cam. The total of over 3000 new houses makes this the largest development in the draft Local Plan.

ENVIRONMENTAL - CARBON NEUTRAL 2030 (CN2030)

The proposed development in the Slimbridge Parish will have a massive impact on the area across the full spectrum of environmental considerations.

The Draft Local Plan was produced in advance of CN2030 and the Proposed site in Slimbridge Parish falls short across numerous policies within CN2030.

The Stroud District Green Party state

"The current consultation was launched in advance of the District Council declaring a climate emergency and committing itself, alongside other progressive local authorities, to reaching carbon neutrality by 2030. Attaining carbon neutrality by 2030 will have challenging implications for our revised local plan. It will require setting aside sites and policies to encourage significant additional renewable energy generation, including in appropriate locations within the AONB. New houses will need to be future proof and carbon zero, which will also reduce future energy bills and boost our local skills base in low carbon building. Reducing travel and modal shifts in transport will be important, transport needs to have an inbuilt hierarchy, which prioritises those modes of transport with the least greenhouse gas emissions (walking, cycling, buses and trains, as well as enabling the growth of electric vehicles and upcoming new transport technologies). Additional high-quality agricultural land will need to be retained for human food production and other land for carbon sequestration.

If well planned all these changes can make our district a cheaper, safer, more attractive, more communal, more biodiverse and resilient place to live.

The Green Party objects to the Tory Government imposed demand that land is allocated for 12,800 additional homes by 2031. We believe this figure has been calculated using a flawed methodology and is undeliverable without significant damage to our environment and communities. We believe that if land is allocated within Stroud District to meet the housing needs of Gloucester City, then this number should be deducted from, rather than additional to, the numbers being forced upon Stroud District Council.

The Council needs more powers to force developers to build on brownfield sites and smaller, affordable homes. We are aware that the greatest need is and will be for both young people and young families as well as an increasing elderly population."

The proposed development will consume high quality agricultural land whilst increasing emissions through higher commute miles and private car usage.

SDC Policy CP14 High quality sustainable development states: -

High quality development, which protects, conserves and enhances the built and natural environment, will be supported.

Development will be supported where it achieves the following:

- 1. Sustainable construction techniques, including facilities for the recycling of water and waste, measures to minimise energy use and maximise renewable energy production*
- 2. No unacceptable levels of air, noise, water, light or soil pollution or exposure to unacceptable risk from existing or potential sources of pollution. Improvements to soil and water quality will be sought through the remediation of land contamination, the provision of SuDS and the inclusion of measures to help waterbodies to meet good ecological status*
- 3. Adequate water supply, foul drainage and sewage capacity to serve the development and satisfactory provision of other utilities, transport and community infrastructure*
- 4. No increased risk of flooding on or off the site, and inclusion of measures to reduce the causes and impacts of flooding as a consequence of that development*
- 5. An appropriate design and appearance, which is respectful of the surroundings, including the local topography, built environment and heritage*
- 6. Re-use of previously developed land and/or the adaptation of existing buildings that make a positive contribution to the character of the site and surroundings, unless demonstrably unviable*
- 7. No unacceptable adverse effect on the amenities of neighbouring occupants*

8. *Contribute to the retention and enhancement of important landscape & geological features, biodiversity interests (including demonstrating the relationship to green infrastructure on site and wider networks)*

9. *Contribute to a sense of place both in the buildings and spaces themselves and in the way in which they integrate with their surroundings including appropriate landscaping, biodiversity net gain, appropriate open space, sport and amenity space provision*

10. *A design and layout that aims to assist crime prevention and community safety, without compromising other design principles*

11. *Efficiency in terms of land use, achieving higher development densities in locations that are more accessible by public transport and other non-car modes and where higher densities are compatible with the character of the area and the setting of the development*

12. *It is not prejudicial to the development of a larger area in a comprehensive manner*

13. *Safe, convenient and attractive accesses on foot and by cycle and suitable connections with existing footways, bridleway, cycleways, local facilities and public transport*

14. *It is at a location that is near to essential services and good transport links to services by means other than motor car.*

The proposed site in the Slimbridge Parish falls short on items 2, 3, 4, 5, 7, 8, 11 and, in particular, 14 as the essential services are located in Cam and Dursley and the train station is only really accessible by car, and this facility is at full capacity.

Sustainability Appraisal Report for the Stroud Draft Local Plan 65 November 2019 SA10 possess the question

SA 10.2: Does the Plan promote more sustainable transport patterns and reduce the need to travel, particularly in areas of high congestion, including public transport, walking and cycling?

SA 10.3: Does the Plan promote more sustainable transport patterns in rural areas?

With the average commute distance being 17km and essential services being some miles away cycling or walking is not realistic. Public transport continues to be unpopular with only 3% of the population utilising it regularly so the car will remain a necessity not just for commuters but families, shoppers etc.

The proposed development in Slimbridge Parish falls significantly short in both areas.

Conclusion

The proposed development in Slimbridge Parish falls short in so many areas highlighted within CP14 and in particular CN2030 that it is difficult to see how it can conceivably stay within the local plan.

AGRICULTURAL LAND CLASSIFICATION (ALC)

ECT and GCC commissioned Soil Environment Services Ltd to conduct an agricultural land classification at Narles, Slimbridge Estate, Wisloe in September 2019.

It is not clear why this report was commissioned as the land was already classified as ALC Grades 2 and 3 by the Ministry of Agriculture, Fisheries and Food (MAFF) in 1983 and the south of the site was graded more recently in 1997 (ALCB/87/97 and ALCB/88/97) as Grades 2, 3a, 3b and 4. This is acknowledged in the subject report at paragraph 5.1.

Curiously the findings of the recent report contradict both previous classifications and are also in sharp disagreement with the opinions of the people working the land. [REDACTED] the current farmer, states:

"I have farmed land at the proposed Slimbridge site since 2007 in which time I have grown numerous cereal crops. These have included maize (corn) for combining as a grain crop, maize for forage, wheat both first and second wheats and spring barley. Potatoes were also grown prior to my tenancy. We have had volunteer potatoes (from original planting) in our crops for many years. The land is easy to work, grows consistently well above average yields unlike other land we farm in the south of the Slimbridge Estate which is classified as Grade 3".

The implication of [REDACTED] statement is that this land cannot be considered Grade 3b if above average yields have been consistently achieved.

The finding at paragraph 5.2 is that the land is 98.9% Grade 3b. The only exception is the other 1.1% or 0.8ha of non-agricultural land belonging to the stables. However, the land is broken up into several fields. Some are regularly farmed, as stated by [REDACTED] and others are merely pasture used for grazing horses and yet the assessment classifies all the land at the same grade. How can that be? How curious!

As far as we are aware, no local people were consulted, indeed no one living adjacent to the site, or tenants working the land or the livery yard, saw anyone conducting the two-day long assessment.

Professional sources at Hartpury College have reviewed the assessment and question the methodology. They made three observations:

1. They suggest we need to ask whether the soil type was hand textured as this method is open to personal interpretation and should nowadays be laser tested for accurate soil type analysis.
2. The fact that there is stone at 55cm means that, with drainage, the soil could be improved to produce higher levels of crop production and therefore raise the potential classification to 2 or 3A. This observation is at odds with the fact that parts of the land are fertilised and yet the assessor found no variation in grading.
3. There should been a soil analysis carried out to identify the soil fertility.

What is most disturbing is that the consultants failed to contact Wales and West Utilities (WWU) with regard to core sampling near the high-pressure gas line which runs diagonally through the site. According to the firm, Soil Environment Services, they were not informed by either ECT or GCC about the presence of a pipeline. It seems most unprofessional not to conduct a full pre-assessment health and safety check and simply rely 'on being told'. Similarly, either ECT or GCC didn't know there was such a potentially dangerous obstruction across the site when they drew up the plans, or they failed to notify the consultant they employed to conduct the assessment. The pipeline is clearly marked across every field and road crossing. An example can be seen in the photograph below. How could a professional assessor spend two days on site and fail to notice or understand the significance of such obvious markings?



How much has this significant restriction on development been taken into account in the plans which are being proposed?

WWU general conditions state the following:

13. BUILDING PROXIMITIES

There are minimum proximity distances for buildings from WWU mains depending on both the operating pressure and the material of the main. Advice should be sought from WWU prior to building works taking place to confirm these distances. For High Pressure pipelines you must seek further guidance from the HSE and Local Authority Planning team regarding their PADHI distances regarding building proximities as these may be in addition to WWU proximity distances for a pipeline.

Temporary buildings should not be placed above any gas pipe or within 3.0 metres of mains operating above 75mbar (medium, intermediate and high-pressure mains) during construction activities and in no circumstances should permanent structures be built over any pipe transporting gas.

WWU have informed us that the erection of permanent buildings is not only forbidden but is also accompanied by an easement which is typically between 6 and 15 metres either side of the pipeline. This will need to be applied diagonally across both parts of the proposed development. Hardly the fluffy image for a 'garden village'.

Aside from a serious health and safety violation, this whole saga is typical of so many areas of this proposal. Rushed, incomplete, incompetent and failing to consider even the most obvious clues to why it is not a viable plan.

We are sure it will have not escaped the potential developers' attention that it would be much more difficult to build on Grade 2 land than on Grade 3b. Indeed, SDC, with its green credentials, would surely not have condoned building on land which is relatively rare in this district and needs to be cherished and protected.

All in all, the findings of the assessment commissioned by the potential developers are dubious to say the least, particularly when considering the publication HM Government (2018): A Green Future: Our 23 Year Plan to Improve the Environment.

The key area of relevance to the emerging Local Plan Review is:

Using and managing land sustainably:

Embed a 'net environmental gain' principle for development, including natural capital benefits to improved and water quality.

*Protect best agricultural land. Improve soil health and restore and protect peatlands.
Recovering nature and enhancing the beauty of landscapes:*

Given the potential conflict of interest we want a further, independent classification carried out. In order to promote fairness and balance, the company should be independently selected by the Wisloe Action Group and the classification funded by SDC.

COALESCENCE

Slimbridge Parish contains two main villages, these being Slimbridge and Cambridge, plus the hamlets of Gossington, Moorend, Tumpy Green, Kingston, Troy Town and Shepherds Patch. The parish covers approximately 6.5 square miles. A huge concern of the parishioners is losing the identity, charm and individuality of these villages and hamlets.

SDC policy ES7. Paragraph 6.43 notes

“the principle pressure on the landscape arising from new development is erosion of the separate identity, character and functional amenity of settlements and the setting, and impacts on the open countryside”.

The proposed site within Slimbridge parish will have huge impacts on the open countryside and result in the coalescence of Slimbridge, Cambridge, Gossington and indeed the M5 and Cam.

The Draft Plan 2019 goes on to state:

Core Policy CP15 A quality living and working countryside

In order to protect the separate identity of settlements and the quality of the countryside (including its built and natural heritage), proposals outside identified settlement development limits will not be permitted except where these principles are complied with:

1. It is essential to the maintenance or enhancement of a sustainable farming or forestry enterprise within the District; and/or 2. It is essential to be located there in order to promote public enjoyment of the countryside and support the rural economy through employment, sport, leisure and tourism; and/or 3. It is a ‘rural exception site’, where development is appropriate, sustainable, affordable and meets an identified local need; and/or It is demonstrated that the proposal is enabling development, required in order to maintain a heritage asset of acknowledged importance; and/or 5. It is a replacement dwelling or subdivision; and/or 6. It is a house extension; and/or 7. It will involve essential community facilities; and/or 8. It will involve the re-use of an existing rural building; and/or 9. It is a scheme of up to 9 dwellings at a designated Tier 4a or 4b settlement, supported by the local community.

The Proposed development within Slimbridge Parish doesn’t appear to fit any of the above criteria.

Sustainability Appraisal Report for the Stroud Draft Local Plan 65 November 2019 asks:

SA 5.3: Does the Plan safeguard and enhance the identity of the District’s existing communities and settlements?

SA8, 8.4: Does the Plan prevent coalescence between settlements?

SA 8.5: Does the Plan protect and enhance the District’s natural environment assets.

The proposed development within Slimbridge Parish doesn’t safeguard settlement identities, prevent coalescence and certainly does not protect or enhance the natural environment.

The Slimbridge Village Design Statement December 2016

Slimbridge Landscape and Natural Environment (SLN) Key Objectives: To conserve the identity of the separate villages of Slimbridge and Cambridge and the smaller hamlets surrounding these. The open and rural nature of the area should be conserved and encouragement for the natural environment to be preserved.

SLN 2 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. Relating to policy CP15 in the Local Plan referring to quality living and working in the countryside; and ES12 as this refers to site appraisal using local design statements and ensuring design and access statements.

In addition to this the coalescence with Cam creates one large urban sprawl from the Cotswold escarpment through to the Severn Estuary and therefore it should be removed from the draft Local Plan. The M5 motorway cannot be considered a natural and clear break between the two settlements. If the plan is adopted it will result in 3,500+ new houses either planned, in planning, or proposed to be built at Cam and Wisloe.

This makes it the single largest house concentration in the district and therefore when assessing the impact on the environment, service infrastructure and road infrastructure it is only right to consider this as one big development and not to dilute the issues by stating that it is two!

One of the defining characteristics of a 'Garden Village' (as Wisloe is described) is a 'new discrete settlement, and not an extension of an existing town or village'. This does not exclude proposals where there are already a few existing homes. Clearly therefore, the proposed Wisloe development, which joins Dursley/Cam with Slimbridge, Cambridge and Gossington is not a Garden Village.

Conclusion

The proposed site falls outside the settlement development limits of both Slimbridge and Cambridge and falls very short of protection the identities of the settlements of Slimbridge, Cambridge and Gossington. In addition to this, the issues with coalescence with Cam creates one large urban sprawl from the Cotswold Escarpment through to the Severn Estuary and therefore it should be removed from the draft Local Plan.

POSITION WITHIN THE DISTRICT

The majority of the projected delivery of new houses are in the South of the district whilst the majority of employment places and services are located to the North of the district. This results in the creation of dormitory settlements thereby increasing the number of people commuting and also extending the length of their journeys.

The National Planning Policy Framework (NPPF) February 2019 104 States

“Planning policies should: a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;”

NPPF also states

2.54 encourages local planning authorities to promote land uses, transport infrastructure and technologies that reduce the need to travel, greenhouse gas emissions and congestion. Developments that will generate significant movement are required to be located where travel can be minimised, and the use of sustainable transport modes maximised.

2.55 requires that “transport issues should be considered from the earliest stages of plan-making”. The scale, location and density of development should reflect “opportunities from existing or proposed transport infrastructure”. To help reduce congestion and emissions and improve air quality and public health the planning system should focus significant development “on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”

The proposed development in Slimbridge Parish does not seem to be commensurate with the above with regards to current commuter trends.

Sustainability Appraisal Report for the Stroud Draft Local Plan 65 November 2019 poses the questions

SA 10.2: Does the Plan promote more sustainable transport patterns and reduce the need to travel, particularly in areas of high congestion, including public transport, walking and cycling

SA 10.3: Does the Plan promote more sustainable transport patterns in rural areas

SA 16.2: Does the Plan provide for accessible employment opportunities?

SA 16.3: Does the Plan support the prosperity and diversification of the District’s rural economy?

Again, the proposed development in Slimbridge Parish does not seem to be commensurate with the above with regards to current commuter trends.

Furthermore

SDC’s own Settlement Role and Functions Study in 2018 shows that the Berkeley Vale already has the highest commuter miles of the district, the fewest jobs, along with the lowest level of amenities and infrastructure and this results in the highest level of car ownership in the district. Alternative sites closer to the main employment centres would be more appropriate than large sites in the south which are equidistant from both major employment centres.

SDC’s Draft Sustainable Transport Strategy Document shows that the average commute distance in the area is 17km. This is consistent with the fact that people largely work away from the locality.

Even if public transport use and cycling to work was to be doubled there would be negligible impact on car use. The Cycling and Walking Investment Strategy (2017) is probably a useful reference for town dwellers, not rural communities.

The car is seen as a necessity not just for commuting but also to reach shops, entertainment facilities, etc. This is the economic and practical reality. Indeed, SDC itself recognises that public transport is infrequent and often unreliable.

Conclusion

The proposed development in Slimbridge Parish is in an area of relatively low employment and therefore will become yet another dormitory settlement increasing commuter miles and therefore production of harmful emissions.

This is in direct contradiction to SDC's CN2030 commitment and fails to comply with other SDC and NPPF's policies on the location of developments in terms of employment, services and infrastructure and should therefore be removed from the local plan.

How can SDC justify building the majority of its housing commitment in a rural area with little local employment and infrastructure when other sites are available and are closer to work centres?

INFRASTRUCTURE

This section assesses the issue of infrastructure relating to the proposed Slimbridge (Wisloe) site. Economic infrastructure aspects specifically relating to transport and water/sewerage are covered separately in other sections.

The proposed Wisloe 'Garden Village' development of 1500+ dwellings is immediately adjacent to potentially 2000+ new dwellings at the northern side of Cam. Wisloe is in the parish of Slimbridge whereas the Cam extension is within Cam's parish however the new residents will not recognise the invisible parish boundary. From an infrastructure perspective a new dwelling demand of circa 4000 should be used for any assessment. One of the defining characteristics of a 'Garden Village' is a 'new discrete settlement, and not an extension of an existing town or village. This does not exclude proposals where there are already a few existing homes. Clearly therefore, the proposed Wisloe development, which joins Dursley/Cam with Slimbridge, Cambridge and Gossington is not a Garden Village.

As occurred in the 1920s when New Towns were first introduced, many developers throughout the country are adopting the term 'garden village' in the branding of their developments, regardless of the extent to which there is a commitment to deliver in line with the Garden City principles.

Based on an average household rate of four residents/dwelling Wisloe alone could potentially increase to 6,000 residents, whereas inclusion of the new north Cam developments would swell the total to an additional demand of 14,000 inhabitants. This sudden influx will put enormous strain on the infrastructure in the local area. The following is an assessment of a few of the major infrastructure aspects (excluding transport and water/sewerage):

Schooling – The Wisloe proposal mentions provision for a new primary school, presumably to accommodate the children from both Wisloe and north Cam? Experience from other similar developments shows that new schools are constructed too late in the process which causes massive disruption during the initial period when there is a significant shortage of places at existing local schools. The tendency is also for new residents to housing estates to be young families which will have a disproportionately high number of children. Over time this will result in an initial bow wave of children passing through which will then be followed by a significant reduction. This fluctuation will put enormous strain on the existing surrounding primary schools. The local secondary schooling is at Rednock which is already at full capacity and there are no plans to increase capacity. Therefore, additional children beyond the Cam parish boundary, from the Slimbridge parish (Wisloe), will have to attend an alternative secondary school which will be much further away. In November 2018 GCC recognised they needed to increase the provision of secondary school places as a result of past birth rates alone. In addition, they noted that the then Cam developments required additional school places. If local children were to attend Rednock school this would necessitate a major investment and extension to the school building.

Sports Centre and Leisure Facilities – The Wisloe proposal currently mentions a 'community facilities' building which is likely to be similar to the one in the centre of Cam i.e. a café.

Major sports and leisure facilities (including a swimming pool) will continue to be provided in Dursley. The Pulse in Dursley is already near full capacity with very little flexibility to accommodate any additional Wisloe and north Cam residents. Demand from new residents will further reduce the accessibility for sports and leisure facilities for existing residents in the local area.

Supermarkets – The main centres of Cam and Dursley have sufficient supermarket capacity for the local area but parking is at a premium. The parking outside the Pulse and at Sainsburys in the centre of Dursley is particularly congested and will only deteriorate further with the significant increase in resident numbers wanting to use the facilities.

GP Surgeries – There are currently two GP practices at three sites (including Cam/Uley) and they are both full. An additional GP practice will need to be established in the north Cam/Wisloe area to cater for the increased demand or the existing practices extended to cope with the increased demand. The same applies to dental practices and pharmacies.

Policing and fire service - Policing is under great strain at the moment (nationally and locally), Cam police station is not continuously manned any longer and there is no mention of how this will be affected by the significant increase in local population or how it will be addressed?

Transport – This aspect is covered in more detail within a separate WAG response and is included here for completeness only. The Local Plan assumes there will be little impact on traffic volumes as people will use public transport or cycle.

Existing evidence shows that most people prefer to drive. Cam and Dursley railway station is not easily accessible so most people need to drive to it and so usage is limited by car park capacity, and even if more spaces were available, it's a matter of choice.

The service from the station is poor and is unlikely to be capable of improvement. It provides 2 & 3 carriage trains and there are no convenient stations near the major employment areas of Stonehouse and Quedgeley. Public transport is slow and infrequent to the same areas, so people prefer to drive to work. Access to the services in Cam and Dursley are only really possible by car because of the distance and the poor pedestrian provision on the A4135. This further increases traffic and pollution. There will be major issues accessing and using the A38 and there are no plans to deal with this. A significant financial investment in additional rail and road capacity is required to match the proposed resident increase to keep the area moving and to avoid massive congestion.

Access to these facilities will almost certainly be by car which will increase traffic flows, albeit no worse than the daily commute from these dormitory settlements, but there will be significant increase in demand for parking.

If past experience is anything to go by then it's most likely the local area will not receive additional funding from Government/county/district to invest in improving the local infrastructure to match the increase in local population. Recognising this reality means it would be more appropriate for SDC to adopt a dispersive approach to housing allocation which would share out the additional demands on infrastructure more equitably across the district.

The Wisloe proposal does not therefore comply with the NPPF 122 (c) requirement to account for appropriate levels of *availability and capacity of infrastructure and services* – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use. Furthermore, the Wisloe proposal is not compliant with SDC's Sustainability Appraisal report as it does not:

SA 2.1: Plan to improve access to doctors' surgeries and health care facilities

SA 6.2: Promote the provision of new and the protection of existing services and facilities at sustainable locations

SA 10.2: Promote more sustainable transport patterns and reduce the need to travel, particularly in areas of high congestion, including public transport, walking and cycling

In summary, the assessment above shows the significant increase in housing proposed for Wisloe and north Cam would put enormous strain on the existing infrastructure as very little new infrastructure will be developed, it is not clear what options are available to meet the increased demand? Many of the existing facilities are already operating at full capacity and have no ability to increase.

Dispersing the housing requirement in a more equitable fashion across the district would avoid the bottleneck issues described above and save SDC from significant investment in new infrastructure. This WAG assessment concludes the Wisloe site proposal should not be included in the Local Plan.

TRANSPORT

Road Traffic

There can be no doubt whatsoever that the building of up to 1500 new homes at Wisloe along with the large number of other proposed homes in both the Cam and Berkeley clusters will further stress the current road infrastructure in the immediate vicinity. Furthermore, the developments further afield such as at Hardwick and Falfield will only serve to accentuate this.

Transport and transport planning do not fall within the strict remit of the district council, but it has obligations through the planning process to consider the effects of developments on road infrastructure. The Department of Transport Circular 2/13 concerning The Strategic Road Development and the Delivery of Sustainable Development (a policy to be read by Authorities and developers alike) notes the following:

'Development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the strategic road network, or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.'

The A38 access to the M5 at Junction 14 already operates to capacity as noted by the Highways and Transport Technical Overview commissioned by Ernest Cook Trust and Gloucestershire County Council. It is a major cause of congestion at the busiest times of the day on the A38. We would suggest the cumulative impacts are already severe and will only get worse.

In November 2019 SDC published its Draft Sustainable Transport Strategy Document. Along with SDC's 'commitment' to be carbon neutral by 2030 there are many facets that are laudable. The document has seen much energy put in extolling the health benefits of cycling and walking and the provisions for improvement. However, for these aspirational policies to be taken seriously there needs to be acceptance of economic reality and an honesty with the public particularly with regards to proposed developments and the timeframes involved.

The STS document for the district notes the following commuter 'journey to work' statistics;

Work from home	9%
Walk	9%
Cycle	2%
Bus	2%
Train	1%
Car Passenger	5%
Self Drive car/van	70%
Other	2%

This is hardly surprising – we do live in a rural community. The average commute distance is 17km, again consistent with the fact that people largely work away from the locality. Even if public transport use and cycling to work was doubled there would be negligible impact on car use. The Cycling and Walking Investment Strategy (2017) is probably a useful reference for town dwellers. The car is seen as a necessity not just for commuters but families, shoppers etc. This is the economic and practical reality. Indeed, SDC itself recognises that public transport is infrequent and often unreliable.

The proposed Wisloe site of 1500 houses plus a further 2,000+ in Cam could see at least a further 3,500 vehicles 'on site' and possibly many more as 47.5% of SDC households have 2 or more vehicles. That is more vehicles (however green they may be in the future) taking people to and from work because the places of work are not in Wisloe!

Furthermore, the Sustainability Appraisal Scoping Report for the Stroud District Local Plan Review (LUC April 2018) notes the following with regards to transport issues.

Transport

2.54 The NPPF encourages local planning authorities to promote land uses, transport infrastructure and technologies that reduce the need to travel, greenhouse gas emissions and congestion. Developments that will generate significant movement are required to be located where travel can be minimised, and the use of sustainable transport modes maximised.

2.55 The draft revised NPPF requires that “transport issues should be considered from the earliest stages of plan-making”. The scale, location and density of development should reflect “opportunities from existing or proposed transport infrastructure”. To help reduce congestion and emissions and improve air quality and public health the planning system should focus significant development “on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.” The draft revised framework also requires that planning policies support an appropriate mix of uses across an area to further help reduce the need to travel as well as the provision of high-quality walking and cycling network.

The Wisloe development proposal does not seem commensurate with the above with regards to current commuter trends.

Rail Traffic

The proximity of the Cam and Dursley (C&D) train station may seem an attractive alternative to the car for the potential Wisloe dweller/commuter. However, access and parking at this station is now a major issue particularly with the further residential developments that have taken place along Box Road. C&D is a simple 2 platform station with no loops or sidings. There is evidence to suggest that the Gloucester/Bristol line is itself operating to capacity. Stopping services at C&D are generally served by two or three coach trains. They are frequently late and congested. Network Rail recently advised that there about 125 daily movements on the line including non-stopping express traffic and freight movements. They are currently engaged on a study to assess rail capacity.

Furthermore, there has been the suggestion that the Sharpness branch line could be reactivated to C&D as part of a travel plan for proposed homes in the Sharpness area. This, of course, will only stress the network further unless there were station modifications.

Pedestrian Traffic

The A4135 crosses the main railway line. The current narrow pavement on the north side of the carriageway is the only pavement available to pedestrians and is not fit for purpose. The suggested increased pedestrian traffic would necessitate an alternative means of crossing the line, probably by a separate bridge. Furthermore, residents on the south side of the A4135 wishing to walk towards Cam will need a means to cross before reaching the railway bridge. To do so safely will surely mean a traffic light controlled crossing which again will hinder traffic flow at peak times.

SETTLEMENT TIERING

This document assesses the issue of tiering for the villages immediately affected by the proposed Wisloe development.

The proposed Wisloe development is bounded by the M5, A38, railway line and river Cam and is entirely within the parish of Slimbridge. The settlements which would be affected by the proposal are the main villages of Slimbridge and Cambridge and the surrounding hamlets of Gossington and Wisloe. The Wisloe proposal is being marketed as a 'Garden Village' but that is irrelevant as far as this assessment is concerned which is purely based upon the impact to tiering resulting from introduction of a large housing estate.

The current Wisloe plan stretches from Cambridge in the north to Gossington in the south tracking the edge of the A38. The edge of Slimbridge village, in the centre of the proposal abuts the A38, Wisloe is completely surrounded in the proposal. One road width of separation is not sufficient delineation between settlements to distinguish between them. Essentially, the proposal joins all four settlements with Wisloe.

The draft Local Plan states Slimbridge to be Tier 3b and Cambridge to be 4a (was previously 5). Tier 3b states 'These small and medium sized rural villages 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'. Tier 4a states 'These small and very small villages provide a limited range of services and facilities for their communities. These settlements are relatively less sustainable for growth and most face significant environmental constraints. Both Tier categories state they are **not suitable for growth** yet the proposed Wisloe proposal would join them all up creating a single settlement three times the current size (from 500 to 2000 dwellings). This housing growth increase does not comply with the current Tier rating definitions for the villages contained in the Local Plan.

Furthermore, the current housing developments proposed for the north of Cam, if accepted, will join with the Wisloe development thus creating a single amorphous urban sprawl from the Cotswold AONB in Dursley through to the Severn Valley. The coalescence of the villages around Wisloe with Cam and Dursley (both Tier 1 settlements) will remove their individual identity and effectively make all the villages Tier 1 settlements as well. This new large Tier 1 urban conurbation which coalesces the villages of Slimbridge, Cambridge and Gossington with Cam/Dursley is contrary to SA8 of the SDC Sustainability Appraisal.

It does not:

SA 8: Conserve and enhance the local character and distinctiveness of the landscape.

SA 8.1: Protect and enhance the District's sensitive and special landscapes.

SA 8.2: Prohibit inappropriate development that will have an adverse effect on the character of the District's countryside and settlements.

SA 8.3: Promote the accessibility of the District's countryside in a sustainable and well-managed manner.

SA 8.4: Prevent coalescence between settlements.

SA 8.5: Protect and enhance the District's natural environment assets (including parks and green spaces, common land, woodland and forest reserves

The WAG assessment of 'Tiering' concludes the Wisloe proposal does not comply with the level 3 and 4 tiering definitions for Slimbridge and Cambridge respectively defined in the Draft Local Plan and should not be accepted. The Wisloe proposal would result in major coalescence, loss of individual village identity and absorption into a significant new development which would grow the villages by a factor of four.

IMPACT TO THE RURAL COMMUNITY

SDC's Core Strategy states that it *"aims to protect and enhance the natural and built environment of the district"*. The Stroud area is officially designated a Rural District with the Severn Vale, in which the Slimbridge Parish is located, being its most rural part.

The Sustainability Appraisal Report states that the District is *"mostly rural in character with 51.6% of the land classed as rural. The population density in the most rural parts of the District is less than one person per hectare"*.

www.openaccessgovernment.org states that a Garden Village *"By definition, it is a piece of brownfield land that is used to develop new areas for families and businesses"*.

This is not true of the proposed Slimbridge site, which is primarily greenfield, apart from the Wisloe Farm site which resides directly below the A4135 and contains an arena and agricultural barns.



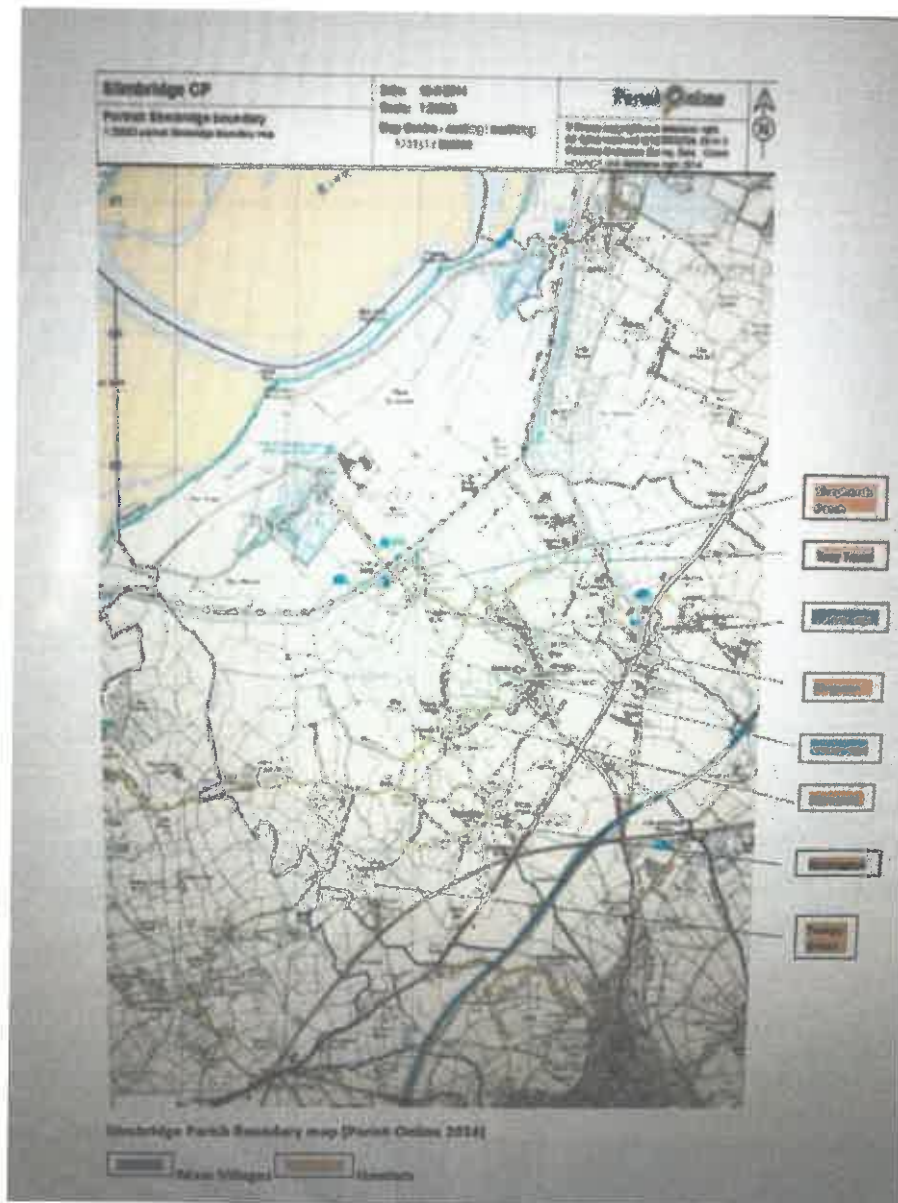
Photo 1 – North of the A4135



Photo 2 - South of the A4135

The Slimbridge Village Design Statement provides detail on how the parish has evolved over time with small developments and on primarily open, flat, farming countryside.

The Slimbridge Parish has developed organically and is linear in form with dispersed communities as shown in the map below <https://www.stroud.gov.uk/media/241059/2016-12-final-slimbridge-village-design-statement.pdf>.



Slimbridge Built Environment (SBE) Key objectives: To ensure any future development enhances the character and identity of the area, safeguarding traditional buildings and key features. **Issues:** Some recent developments have had little consideration for the appropriateness of the local settings with a danger of urbanising the rural parish that Slimbridge wishes to remain.

The proposed allocation of such a large site physically joins Slimbridge, Gossington, Cambridge and Cam and will fundamentally change the rural community forever as it will become a town. It is not in keeping with the current built form. The proposal to include a town sized housing estate in a very rural community will destroy the very nature, beauty and character of what makes it a wonderful place to live, work and play.

EMPLOYMENT ISSUES

In respect of the Stroud economic strategy, there is an aspiration to create two jobs for every new dwelling. It is considered that this is an ambitious approach and there is insufficient explanation of how it will be achieved. The Berkeley ward currently offers little in the way of employment and the Local Plan doesn't address this issue.

The Draft Local Plan 2019 states: -

2.56 There is considerable out-commuting to work, which presents a big challenge if we are to reduce our District's carbon footprint as a rural district, many people are car-dependent, so we also need to ensure that access to jobs, services and facilities can be improved in the future and our chosen strategy must enable more sustainable forms of transport to be used. In order to stem out commuting Stroud will need to attract more knowledge-based industries, enabling greater employment opportunities for the highly skilled and well qualified working population. This suggests a need for the District to both increase and diversify its employment base, in order to provide local job opportunities, appropriate to the workforce and to help reduce the number of people travelling to towns and cities beyond the District for work.

Core Policy DCP1 discourages the use of private car and seeks to minimise the need to travel. Dursley, Cam and the surrounding area are already dormitory settlements and with little in the way of employment planned for the area it is inevitable that the use of private car usage will rise.

Cam Parish Councils employment report 2019 is concerned about the number of residents travelling to work outside of the district and comments: -

Developers need to build significant numbers of larger (4- and 5-bedroom) housing to make developments viable, particularly with the significant infrastructure burden placed upon such developments. Yet these larger sized houses will house higher earners who typically will commute out to where the higher value jobs are located, i.e. Bristol and Gloucester.

Cam and Dursley are known dormitory settlements with workers often travelling to employment centres in Stroud, Stonehouse and outside of the District to Gloucester and Bristol. The proposed development offers little in the way of business premises and certainly will be well short of the target of two jobs for every dwelling.

The Sustainability Appraisal of Stroud District Council's Local Plan Review 2019 States: -

SA 16: To deliver, maintain and enhance sustainable and diverse employment opportunities, to meet both current and future needs.

And poses the questions: -

SA 16.1: Does the Plan allow for an adequate supply of land and the delivery of infrastructure to meet the District's employment needs?

SA 16.2: Does the Plan provide for accessible employment opportunities?

SA 16.3: Does the Plan support the prosperity and diversification of the District's rural economy?

SA 16.4: Does the Plan support equality of opportunity for young people and job seekers and opportunity for the expansion and diversification of business

The plan fails to address any of these questions.

*SA 17: To allow for sustainable economic growth within environmental limits and innovation, an educated/ skilled workforce and support the long term competitiveness of the District.
And possess the questions: -*

SA 17.1: Does the Plan seek to promote business development and enhance productivity?

SA 17.2: Does the Plan maintain and enhance the economic vitality and vibrancy of the District's town centres and tourist attractions?

SA17.3: Does the Plan promote the image of the District as an area for investment and will it encourage inward investment?

SA17.4: Does the Plan promote access to education facilities for residents?

SA17.5: Does the Plan help to support increased economic activity throughout the District?

Once again, the plan fails to address any of these questions.

Conclusion

The proposed development within Slimbridge Parish fails to deliver anywhere near the number of employment opportunities to meet with SDC's aspirations, current local requirements and certainly not for the 3000 plus new residents that will inhabit the new houses. The Berkeley ward is already a huge dormitory area where workers outnumber employment places by a factor of 3:1. This has already resulted in the average commute to work distance being 17km and car ownership being the highest in the district. The failure of the district council to meet the employment requirements of Cam, Dursley is already a problem and this can only be exacerbated with the proposed development.

ECOLOGY

The proposed Slimbridge site does not meet the requirements of the NPPF which states;

To contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The proposed Slimbridge site cannot contribute and protect the natural environment as building on this land will impact the wildlife that it currently sustains.

Recreational Catchment Zone

The proposed Slimbridge site is located within the identified 7.7km recreational catchment zone of the Severn Estuary which is designated as a Special Protection Area (SPA), a Special Area of Conservation (SAC) and Ramsar site (RS) for its overwintering birds, estuarine habitats and associated species of fish. Habitat Regulation Assessments (HRA) concluded that proposed residential growth identified in the Local Plan within Severn Estuary SAC/SPA/Ramsar could have a likely significant effect.

In 2016 a Visitor Survey Report concluded that Likely Significant Effects on the conservation status of the SPA could not be ruled out.

The Strategy for Avoidance of Likely Significant Adverse Effects on the Severn Estuary SAC, SPA and RS is based on the Stroud District Local Plan (2015) which did not include such a large proposed development so close to the estuary, and is based on housing commitments of 11,400 (not the current proposed forecast which exceeds requirements).

New residential development will further exacerbate pressure to the catchment zone of the Severn Estuary as it brings more people to the local area and will affect the sensitive area through recreational disturbance. As set out in the Habitat Regulations Assessment of the Stroud District Local Plan (carried out by URS in 2014), it was identified that recreational pressure had the potential to impact upon the qualifying features for which the Severn Estuary was designated, in particular through disturbance to the bird species which use the Estuary for feeding and roosting during the Winter. When this strategy was developed it was never envisaged that SDC would propose a site of such massive scale and proximity to the Severn Estuary.

Ornithology

European Birds Directive (2009): Requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

European Habitats Directive (1992): Together with the Birds Directive, the Habitats Directive sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.

European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979): Aims to ensure conservation and protection of wild plant and animal species

and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

The Wildfowl and Wetlands Trust (WWT) is one of the world's largest and most respected wetland conservation organisations working globally to safeguard and improve wetlands for wildlife and people. The WWT has a network of UK visitor centres comprising 2,600 hectares of globally important wetland habitat.

WWT Slimbridge and the surrounding land is of significant International importance. The proposed site is flat open space only 2.75km from the WWT. Protected wildfowl are recorded on the proposed site and the surrounding areas. A development on this site would impact wildfowl feeding grounds and cannot be mitigated against as once the land is covered in buildings the wide and open space is lost forever.

Mammals & Reptiles

It is not possible to include all details of sighting in this response. The report evidence records of water vole, otters and bats. All of these mammals are protected and attempting to make a more significant return. The water vole is a much-loved British mammal better known as 'Ratty' in the children's classic *The Wind in the Willows*. Unfortunately, the future of this charming riverside creature is in peril; the water vole needs urgent help to survive in the UK. Water voles are a vital part of river ecosystems. Their burrowing, feeding and movements help to create conditions for other animals and plants to thrive. Water voles have suffered huge declines as a result of habitat loss, pollution of waterways, housing development and predation.

Once a regular sight in ditches, streams and rivers across the UK, water voles are now absent across much of the country. Conservation groups are working hard to keep water voles in our rivers and streams and restore them to places where they've been lost. By developing at the proposed site, even if a buffer is put in place, the mammal will be impacted by human disturbance of such a large housing population, and the mammal is highly unlikely to remain at the location.

There are records of water vole at the proposed site and the surrounding area. There are also records of otters on the proposed site. The Eurasian otter is the only native UK otter species. It's fully protected as a European protected species (EPS) and is also protected under sections 9 and 11 of the Wildlife and Countryside Act 1981.

Bats are also a protected mammal. There are sighting at the site and a record of a roosting site in Slimbridge. There are also several species of reptiles that have been are recorded and sighted.

Gloucestershire Centre for Environmental Records (GCER)

GCER provide a unique source of information about the wildlife and natural environment of our county. Their database is updated continuously and forms a primary evidence base. The data below is based on an estimated 2km zone (see map below). However, as mentioned above the ecological impact should be considered for a much wider area (see this 7.7km recreational catchment zone section above).

Scientific name	Common Name	Date/Year last recorded	Status
<i>Falco peregrinus</i>	Peregrine	2014-04-06	Bern-A2, BirdsDir-A1, CMS_A2, ECCITES-A, WACA-Sch1_part1
<i>Larus canus</i>	Common Gull	2011-04-22	Bird-Amber, CMS_AEWA-A2
<i>Tyto alba</i>	Barn Owl	2012-09-24	Bern-A2, ECCITES-A, WACA-Sch1_part1
<i>Strix aluco</i>	Tawny Owl	2014-01-22	Bern-A2, Bird-Amber, ECCITES-A
<i>Motacilla flava</i>	Yellow Wagtail	2015-07-08	UK Priority Species 2007, England NERC S.41, Bern-A2, Bird-Red,
<i>Motacilla flava</i> <i>subsp. flavissima</i>	Yellow Wagtail	2011-04-22	UK Priority species-2007, Bern-A2, Bird-Red, England_NERC_S.41,
<i>Motacilla cinerea</i>	Grey Wagtail	2013-09-19	Bern-A2, Bird-Red
<i>Turdus philomelos</i>	Song Thrush	2014-01-10	UK Priority Species 2007, England NERC S.41, Bird-Red,
<i>Muscicapa striata</i>	Spotted Flycatcher	2013-09-22	UK Priority species-2007, Bern-A2, Bird-Red, CMS_A2, England_NERC_S.41,
<i>Falco tinnunculus</i>	Kestrel	2014-01-08	Bern-A2, Bird-Amber, CMS_A2, ECCITES-A,
<i>Emberiza schoeniclus</i>	Reed Bunting	2013-10-02	UK Priority species-2007, Bern-A2, Bird-Amber, England_NERC_S.41,
<i>Anas platyrhynchos</i>	Mallard	2011-05-12	Bird-Amber, CMS_A2, CMS_AEWA-A2
<i>Anser anser</i> <i>subsp. anser</i>	Greylag Goose	2011-07-29	Bird-Amber, CMS_A2, CMS_AEWA-A2,
<i>Passer domesticus</i>	House Sparrow	2014-03-09	UK Priority species-2007, Bird-Red, England_NERC_S.41,
<i>Turdus iliacus</i>	Redwing	2014-01-14	Bird-Red, WACA-Sch1_part1
<i>Falco subbuteo</i>	Hobby	2013-08-22	Bern-A2, CMS_A2, ECCITES-A, WACA-Sch1_part1
<i>Columba oenas</i>	Stock Dove	2012-03-10	Bird-Amber,
<i>Apus apus</i>	Swift	2015-05-08	Bird-Amber,
<i>Alauda arvensis</i>	Skylark	2012-01-15	UK Priority Species-2007, Bird-Red, England_NERC_S.41
<i>Delichon urbicum</i>	House Martin	2014-09-26	Bern-A2, Bird-Amber
<i>Pyrrhula pyrrhula</i>	Bullfinch	2011-06-21	UK Priority Species 2007, England NERC S.41, Bird-Amber,
<i>Anthus pratensis</i>	Meadow Pipit	2014-01-14	Bern-A2, Bird-Amber
<i>Milvus milvus</i>	Red Kite	2013-03-27	BirdsDir-A1, CMS_A2, ECCITES-A, RedList_Global_Near Threatened, WACA-Sch1_part1

<i>Numenius phaeopus</i>	Whimbrel	2016-07-11	Bird-Red, CMS_A2, CMS_AEWA-A2, WACA-Sch1_part1
<i>Larus fuscus</i>	Lesser Black-backed Gull	2011-05-24	Bird-Amber, CMS_AEWA-A2
<i>Turdus viscivorus</i>	Mistle Thrush	2011-05-24	Bird-Red,
<i>Prunella modularis</i>	Dunnock	2012-03-10	UK Priority Species 2007, England NERC S.41, Bern-A2, Bird-Amber
<i>Anser anser</i>	Greylag Goose	2014-02-24	Bird-Amber, CMS_A2, CMS_AEWA-A2,
<i>Linaria cannabina</i>	Linnet	2015-07-22	UK Priority Species 2007, England NERC S.41, Bern-A2, Bird-Red,
<i>Numenius arquata</i>	Curlew	2016-10-29	UK Priority species-2007, Bird-Red, CMS_A2, CMS_AEWA-A2, England_NERC_S.41, RedList_Global_Near Threatened
<i>Numenius arquata</i>	Curlew	2016-07-11	UK Priority species-2007, Bird-Red, CMS_A2, CMS_AEWA-A2, England_NERC_S.41, RedList_Global_Near Threatened
<i>Chroicocephalus ridibundus</i>	Black-headed Gull	2015-05-08	Bird-Amber, CMS_AEWA-A2,
<i>Turdus pilaris</i>	Fieldfare	2011-10-16	Bird-Red, WACA-Sch1_part1
<i>Sturnus vulgaris</i>	Starling	2015-05-08	UK Priority Species 2007, England NERC S.41, Bird-Red,
<i>Vanellus vanellus</i>	Lapwing	2012-02-12	UK Priority species-2007, Bird-Red, CMS_A2, CMS_AEWA-A2, England_NERC_S.41,
<i>Meles meles</i>	Eurasian Badger	2008-01-27	Bern-A3, Protection_of_Badgers_Act_1992
<i>Delichon urbicum</i>	House Martin	2011-06-11	Bern-A2, Bird-Amber
<i>Lutra lutra</i>	European Otter	2008-06-07	UK Priority species-2007, Bern-A2, ECCITES-A, England_NERC_S.41, HabDir-A2*, HabDir-A4, HabReg-Sch2, WACA-Sch5_sect9.4b, WACA-Sch5_sect9.5a, WACA-Sch5Sect9.4c
<i>Falco tinnunculus</i>	Kestrel	2014-10-26	Bern-A2, Bird-Amber, CMS_A2, ECCITES-A,
<i>Alauda arvensis</i>	Skylark	2014-10-26	UK Priority Species-2007, Bird-Red, England_NERC_S.41
<i>Lutra lutra</i>	European Otter	2008-06-07	UK Priority species-2007, Bern-A2, ECCITES-A, England_NERC_S.41, HabDir-A2*, HabDir-A4, HabReg-Sch2, WACA-Sch5_sect9.4b, WACA-Sch5_sect9.5a, WACA-Sch5Sect9.4c
<i>Lutra lutra</i>	European Otter	2007-05-05	UK Priority species-2007, Bern-A2, ECCITES-A, England_NERC_S.41, HabDir-A2*, HabDir-A4, HabReg-Sch2, WACA-Sch5_sect9.4b, WACA-Sch5_sect9.5a, WACA-Sch5Sect9.4c

<i>Alcedo atthis</i>	Kingfisher	2008-06-07	Bern-A2, Bird-Amber, BirdsDir-A1, WACA-Sch1_part1
<i>Arvicola amphibius</i>	European Water Vole	2008-06-07	UK Priority species-2007, England_NERC_S.41, RedList_GB_Endangered, WACA-Sch5_sect9.4.a, WACA-Sch5_sect9.4b, WACA-Sch5Sect9.4c

Gloucestershire Bird Recorder

A full bird survey report over a significant number of years has been provided by the official Gloucestershire Bird Recorder. This is data for the one km grid square SO7402. It is not possible to provide the level of detail in this report (due to size of records) but this is available in excel format. This record contains protected birds including Snipe, Curlew, Lapwing etc.

<https://www.curlewcall.org/>

Ecotricity Report

The following report was submitted to SDC, published in January 2016. Chapter 8 provides ecological information for a 5km area surrounding the M5 Junction 13.

https://www.ecotricity.co.uk/layout/set/popup/layout/set/print/content/download/977991/27070601/file/Volume%203%20-%20Figures_Part1.pdf

The Developers Ecological Survey

The Ecological Survey conducted on behalf of the developers took place over two days in September 2019. The two days appear to include field walk taking photographs and a desk based summary drawn from one report in a limited zone around the site and is not representative of the site, and surrounding land, wildlife Mammals and birds are transient, this has not been taken into account by the developers' ecological assessment.

Local Knowledge/Sightings/Records

In addition, there are sightings and records at a local level which can be provided separately.

A neighbouring landowner has commissioned a more extensive ecological assessment of their land. This will be made available when complete.

NPPF Environmental Objective

A further requirement of the NPPF's environmental objective is that the planning system should contribute to protecting and enhancing the natural environment including helping to improve biodiversity and using natural resources prudently.

In support of this aim the NPPF states that Local Plans should:

“identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks” and should also “promote the conservation, restoration and recreation of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”

Many species of mammal and birds require the open space and cannot be replaced. It is also stated in the vision that the protection of the area's distinct built heritage, estuarine landscape and habitats will remain a priority.

Specific reference is included relating to a variety of attractions which may help to raise the profile of this part of the district. While the vision identifies that the conservation of these features will be a priority, resilience to climate change and associated flood risk will also form part of the approach to the management of the area.

DRAINAGE AND SEWAGE

The residents of Cambridge and Slimbridge are well acquainted with local surface water and sewage flooding which has been an ever-present part of life here for generations. Unfortunately, the incomplete and superficial desk-based appraisal prepared by Peter Brett Associates makes no mention of this or the close to £2 million remediation work recently completed by Severn Trent Water (STW) and GCC.

The Land

It appears the developers are unaware of the full implications of building on such important land. Simply relying on the Environment Agency (EA) flood map is only part of the story. This only takes account of sea and river flooding, not surface water flooding. As we write this objection, the development land is waterlogged and in places, flooded. These pictures were taken as recently as 20 January 2020 and clearly show saturated soil conditions. This is particularly evident where the soil is compacted into a virtually impermeable condition similar to the effect of paving and construction.





Constructing impermeable surfaces on this land will result in increased flood risk for residents of Cambridge and Slimbridge. No amount of mitigating constructions can alter the fact that this land sits on a very high water table (again not mentioned in the appraisal) which, in storm conditions can rapidly flood. It is only the retention of water over the whole surface that limits the flow of water into the River Cam or Lighten Brook (the so-called unnamed brook to the south of the A4135).

Previous Drainage and Sewage Work

The work completed by STW and GCC in 2017 was the result of years of study by both agencies in cooperation with the local community. The reason for this work was twofold. Sewage was backing up into houses and spilling out into the streets every time there was a combination of a high water table and heavy and persistent rain. Also, the surface water drainage system was medieval (literally) and incapable of coping with these same conditions and surface water was flooding properties.

The sewage system was working beyond its design capabilities due to excessive surface water infiltration and STW constructed a model to better understand how this could be addressed. The ideal solution was to replace the entire 1960s system, but this was deemed too expensive at around £6 million and STW opted for identifying the worst infiltration points and attempting to reduce the infiltration at these points. I believe the final bill for this was around £1.2 million. GCC Highways simultaneously installed a 300mm drainage pipe through the centre of Slimbridge village on St Johns road to bypass the old medieval culvert. This was at a cost of around £600k. The desired result was for infiltration to be reduced by 50%, not eliminate it. This is as yet unproven, although during the current flooding conditions residents of Ryalls Lane are reporting backups in the sewage system which suggests the work has not wholly been successful. This has been reported to STW on a number of occasions. STW and the Environment Agency (EA) are conducting a three-year study to assess the effectiveness of the programme after which further work may be required. As was mentioned earlier, flooding is a fact of life in this area and residents are fearful that thoughtless construction will almost certainly see the return of the pre-2017 conditions.

Where to put the extra water?

There are glib assumptions in the appraisal that the flow of surface water into the River Cam and Lighten Brook can be held back through 'strategic attenuation features' in storm conditions. This is, frankly, preposterous and shows a lack of understanding of local conditions. Where we live is not a desk-based exercise!

By definition, the land adjoining the watercourses is already flooded when the greatest threat conditions exist. There is simply nowhere to hold the extra water generated by the construction of houses and roads. As one fire officer said when attending a flooded property in Slimbridge - 'we would pump the water out sir, but there is nowhere to pump it to'.

Lighten Brook is not a babbling brook and has historically been the cause of major flooding. It is a torrent in flood conditions and flows past the school and through the heart of Slimbridge village, sometimes piped and sometimes in an open culvert, through gardens and under a housing estate before it eventually reaches the River Severn. It is worth mentioning now that this objection draws attention to the implications of failing to prevent additional flow of surface water into both watercourses.

The developers and Stroud District Council (SDC) will be held jointly responsible for ignoring this warning should the development go ahead and result in damage to property and harm to residents' health.

Ongoing flood risk

Cambridge residents routinely receive flood warnings from the EA. Clearly that agency does at least appreciate the precarious situation with regard to flooding in the area. Residents have already received six serious flood warnings this year.

An extract from the warning issued on 9 January 2020 reads:

Other locations that may be affected include Chalford, Leonard Stanley and Cambridge. Flood water could be deep and fast flowing, and therefore pose a risk to life.

These warnings will only increase in frequency and intensity with the onset of the effects of climate change. This will mean that the current EA flood risk areas will increase in size and the volume and velocity of the water will increase. How will SDC protect the children from the development when their lives will be at risk if they venture close to the ever-increasing flood zones?

Some comments on the Sustainability Appraisal Report for the Stroud District Local Plan Review - Draft Plan prepared by LUC November 2019.

SA 8 states: To conserve and enhance the local character and distinctiveness of landscapes and townscapes and provide sustainable access to countryside in the District.

SA 8.2: Does the Plan prohibit inappropriate development that will have an adverse effect on the character of the District's countryside and settlements?

Answer: No, it does not. No amount of fluffy PR can disguise a housing estate of 1500 houses is proposed on surface water flood-prone land in Slimbridge parish.

SA 8.3: Does the Plan promote the accessibility of the District's countryside in a sustainable and well-managed manner?

Answer: No, this development builds on open countryside, is not sustainable and damages existing settlements.

SA 8.4: Does the Plan prevent coalescence between settlements?

Answer: No, it actually creates coalescence by creating uninterrupted housing from east Dursley to Slimbridge. Thereby enhancing flood risk for those downstream in Slimbridge parish.

SA 12 states: To manage and reduce the risk of flooding and resulting detriment to public wellbeing, the economy and the environment. The proposed development comprehensively fails all four objectives.

SA 12.1: Does the Plan reduce the risk of flooding from all sources including rivers, watercourses and sewer flooding to people and property?

Answer: No, it increases the risk.

SA 12.2: Does the Plan minimise development in areas prone to flood risk and areas prone to increasing flood risk elsewhere, taking into account the impacts of climate change?

Answer: No, it is being built in an area already prone to surface water flood risk and fails to account for the effects of climate change.

SA 12.3: Does the Plan increase the provision of sustainable drainage at new developments?

Answer: No, the proposals fail to take full account of current and historic difficulties with drainage and fails to provide sustainable solutions.

SA 12.4: Does the Plan promote flood risk reduction and improvement to the flood regime?

Answer: No, the appraisal is incomplete and provides no indication of effective flood risk reduction.

Conclusions

There are a number of conclusions:

The extensive work by STW and GCC completed in 2017 was very welcome but has reduced, not resolved, the flooding risk.

The development contravenes the SDC Sustainability Appraisal Report in a number of critical areas. How can SDC claim to be 'green' and respect the environment when it promotes flawed developments like this?

There is a complete failure to properly evaluate flood and health risks to both existing residents and potential occupiers of the development.

If you disregard the spurious placement of Wisloe in the Berkeley Cluster and replace the Wisloe Green name with what it really is, a Slimbridge parish development, it is easy to see that quadrupling the number of houses in a parish that already experiences an inadequate sewage system and regular flooding is nothing short of negligence.

The people of Slimbridge parish understand and work with the environment to best protect themselves from the ever-present threat of flooding. Lazy planning, like this proposal, reverses all the latest achievements and results in misery for the very people SDC claims to represent.

AIR QUALITY

Objective

To gather air quality data for the site PS37 and determine the likelihood of meeting National Air Quality Standards.

References:

1. UK Air – Air Information Resource interactive map <https://uk-air.defra.gov.uk/data/gis-mapping/>
2. Stroud District Council, 2019 Air Quality Annual Status Report <https://www.stroud.gov.uk/environment/environmental-health/pollution-and-nuisance/air-quality>
3. Sustainability Appraisal of the Stroud District Local Plan Review – Draft Plan, November 2019, <https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/stroud-district-local-plan-review>

National Targets

The UK government, based on EU requirements, has set limits for air pollution for a wide range of pollutants, covering gases such as NO₂, heavy metals such as lead and particulates. The key pollutants which are measured at national and local level are NO₂, PM₁₀ and PM_{2.5}. The mean annual concentration limits are 40 µg/m³ for NO₂ and PM₁₀ and 25 µg/m³ for PM_{2.5}. In addition, limits are set for one hour means.

Comments on references

Reference 1 is an interactive map published by DEFRA, based on 2018 data. The map covers 1 km squares and gives concentrations of NO₂, PM₁₀ and PM_{2.5} in the units required for comparison with the national limits.

Reference 2 is published by Stroud District Council and gives 2018 air quality data for the Stroud district. The Council deploys automatic instruments on two sites and non automatic instruments on 22 sites. The sites are mainly throughout the north of the district and four sites are reasonably close to the M5. The closest monitoring site to PS37 is site 37 near Westend Farm, Grove Lane, Westend and is approximately 150 metres from the M4 at Junction 13. Three other monitoring sites are reasonably close to the M5, site 31 at Upton St Leonards, site 33 at Hardwicke and site 35 at Haresfield.

Analysis of the data

Analysis of the data from reference 1 for the PS37 site, gives the following results:

Mean annual concentration NO₂, 12.23 µg/m³.

Mean annual concentration PM₁₀, 15.04 µg/m³.

Mean annual concentration PM_{2.5}, 9.33 µg/m³.

Analysis of the data from reference 2 for nearby locations gives the following results:

Site 37 mean annual concentration NO₂, 20.34 µg/m³.

Site 31 mean annual concentration NO₂, 22.52 µg/m³.

Site 33 mean annual concentration NO₂, 32.83 µg/m³.

Site 35 mean annual concentration NO₂, 21.35 µg/m³.

Unfortunately, relevant data from Reference 2 were not available for PM₁₀ and PM_{2.5} as the two automated instrument sites were too far away from the PS37 site to be useful.

One hour mean data is not available but based on the annual means found, it is likely that the limits would be met.

Observations

Current on site measurements for NO₂, PM₁₀ and PM_{2.5} concentration levels are not available for the PS37 site but available data shows, with a low degree of confidence, that current limits for NO₂, PM₁₀ and PM_{2.5} concentration levels are probably not exceeded.

The South of site PS37 is of particular concern because of the elevated nature of the M5 at this point. NO₂ is denser than air (1.83 vs. 1.0) and will tend to concentrate in this area of PS37.

Increased volume of traffic on the M5, A38 and A4135 are inevitable due to the development of site PS37 and future developments in Cam and Sharpness, leading to increased levels of pollutants. Queuing traffic at future roundabouts and traffic lights will also add to the problem. This view is supported by Reference 3, page 104, paragraph 5.27, which states: *'significant negative effect is expected for draft site allocation PS37 in relation to SA objective 10: air quality.'*

SDC Core Policy CP14 states: *'No unacceptable levels of air, noise, water, light or soil pollution or exposure to unacceptable risk from existing or potential sources of pollution'*.

SDC Core Policy ES3 states: *'Permission will not be granted to any development which would be likely to lead to, or result in an unacceptable level of:*
2. ...environmental pollution to water, land or air...'

SDC Core Policy ES5 states: *'Development proposals which by virtue of their scale, nature or location are likely to exacerbate existing areas of poorer or marginal air quality, will need to demonstrate (potentially by provision of a formal air quality assessment) that effective measures can be taken to mitigate emission levels in order to protect public health and wellbeing, environmental quality and amenity. Mitigation measures should demonstrate how they will make a positive contribution to the aims of any locally agreed air quality and/or transport strategies for Stroud District...'*

SDC SA 10.1 states: *'Does the Plan avoid, minimise and mitigate the effects of poor air quality'*.

As shown above air quality would be adversely affected by the development of site PS37 and may exceed national limits, mitigation measures are not specified and hence development of site PS37 would not meet the requirements of Core Policies CP14, ES3 and ES5 or SA objective 10

The effect of the increase in air pollution on the Natura 2000 site at Slimbridge, which is of world importance and less than 3 km from PS37, is unknown.

Conclusions

Analysis of the referenced data for site PS37 shows that current data is sparse, and levels of air pollutants are not well quantified. Stroud District Council's own analysis for the development of site PS37 shows a significant negative effect on air quality. Core Policies CP14, ES3 and ES5 and SA objective 10 would not be met. Also, the effects on wildlife at a site of world importance are unknown. Therefore, site PS37 is not suitable for development because of its effect on air quality.

NOISE POLLUTION

References

1. Reference 7952/PR/BL, dated October 2019
2. BS 8233:2014, Design criteria for external noise
3. Review of EIS Application 2018/0758/EIAS
4. Auditory and non-auditory effects of noise on health, Basner et.al., *The Lancet*, Volume 383, Issue 9925, 12–18 April 2014, Pages 1270
5. Does noise affect learning? A short review on noise effects on cognitive performance in children, Maria Klatter, Kirstin Bergström and Thomas Lachmann , *Front. Psychol.*, 30 August 2013

Background

Reference 1 is a noise impact assessment and environmental noise survey carried out on behalf of the ECT and GCC at proposed site PS37.

The main sources of noise were assessed as road traffic noise, railway noise and commercial noise. The survey was carried out to the appropriate standards using correctly calibrated equipment at six locations on the site.

Very high levels of noise were observed on the site caused by road traffic, reaching a maximum of 88 dB(A). Passing trains reached a similar level. Noise from the industrial site at Rocket Rentals was also observed to be high.

Modelling using the results obtained showed that the majority of the site had transport daytime equivalent noise levels of >65 dB LAeq (16 hour), night-time equivalent noise levels >60 LAeq(8 hour) and night-time maximum noise levels >75 dB LAFmax. This implies that in order to meet the required standard for internal noise the walls and roof can be of a conventional construction with double glazed windows and attenuated ventilation in the form of upgraded acoustic trickle vents or a mechanical ventilation system. Windows may be opened for ventilation, but for noise control should be sealed airtight to control external noise. The modelling also showed that, assuming buildings are placed along the boundaries and other measures implemented, the area exceeding the values shown above could be reduced. However, significant areas of the site would still have daytime equivalent noise levels of between 50-65 dB LAeq (16 hour), night-time equivalent noise levels of between 45-60 dB LAeq(8 hour) and night-time maximum noise levels of between 60-75 dB LAFmax.

Noise from the industrial site, Rocket Rentals was also shown to be a problem which would affect most of the Southern section of the site.

Reference 2, section 7.7.3.2 states: *'For traditional external areas that are used for amenity space, such as gardens and patios, it is desirable that the external noise level does not exceed 50 dB LAeq,T, with an upper guideline value of 55 dB LAeq,T' .*

Reference 1 concludes that internal noise levels could be generally within the British Standard 8233:2104 criteria and *'the layout of the site is not known, however, the modelling indicates that with a carefully designed layout (which includes gardens facing away from the noise sources), acceptable external amenity space levels can be achieved across the site.'*

Observations

It should be noted that measurements in dB are not linear and, for example, each 3 dB added doubles the sound energy and when 10 dB is added, the energy is increased ten-fold, while adding 20 dB is a hundred-fold increase.

Despite the conclusions in Reference 1, it is doubtful that the site could meet the permitted noise levels in Reference 2 for external areas. Reference 1 shows that, for significant areas of the site, daytime equivalent noise levels of up to 65 dB LAeq(16 hour), night-time equivalent noise levels of up to 60 dB LAeq(8 hour) and night-time maximum noise levels of up to 75 dB LAFmax. would be present. These noise levels exceed the permitted noise levels in BS8233:2014 for external areas.

Hardwicke Parish Council in their comments on Reference 3, regarding noise problems at Hunts Grove, noted that '*... a number of mitigation options that could be incorporated to try and achieve the 50 dB (LAeq, T) external noise level. However, the results of the modelling demonstrated that there are no practicable mitigation options available to achieve the 50 dB (LAeq, T) external noise level, but that it would be possible achieve 55 dB (LAeq, T) in all but 7 of the plots. These plots would experience levels of between 55 dB (LAeq, T) and 58 dB (LAeq, T)*'.

The noise levels are already very high and can only get worse because of the increased traffic density caused by the plans for housing and industrial development at PS37 and development of the Cam and Sharpness sites.

SDC Core Policy CP14 states: '*No unacceptable levels of air, noise, water, light or soil pollution or exposure to unacceptable risk from existing or potential sources of pollution*'. Site PS37 would suffer from levels of noise pollution which are unacceptable and exceed the requirements of BS8233:2014 and hence do not meet the requirements of Core Policy CP14

SDC Core Policy ES3 states: '*Permission will not be granted to any development which would be likely to lead to, or result in an unacceptable level of:*

1. noise, general disturbance ...'

Site PS37 would not meet the requirements of Core Policy ES3.

SDC SA5.1 state: *SA 5.1: 'Does the Plan help to improve residential amenity (including potential to reduce light, smell and noise pollution) and sense of place?' The plan for site PS37 will not help to reduce noise pollution.*

Warmer summers due to climate change are becoming more common and will result in residents keeping windows open at night to reduce internal temperatures. Given the ambient noise levels a good nights sleep would be most unlikely.

Noise pollution is acknowledged by many studies to cause a number of serious health and behavioural problems (See for example reference 4). Noise pollution is of particular concern in the case of children where noise pollution can have serious adverse effects on learning (see for example the review at reference 5).

Conclusion

The results from Reference 1, previous experience at Hunts Grove, medical and educational studies and failure to meet the requirements of SDC Core Policies CP14 and ES3 and SA Objective 5, clearly demonstrate the unsuitability of proposed site PS37 for a new community.

HERITAGE

Slimbridge parish, of which Cambridge and Wisloe are part, has long been recognised as having had a Roman presence, however, this has only recently been recognised as having far more significance than was previously known.

A little history

The Slimbridge Village Design Statement, December 2016 at 2.2 Historical Development states:

Some evidence exists to show that there was Roman occupation in Slimbridge. An example of this is the remains found in the field to the East of Lane's End Bungalow opposite the end of Gossington Lane. This was probably a resting area for travellers between Aust and Gloucester or Cirencester. Another Roman feature discovered is a ford across the River Cam at Old Ford Farmhouse.

There is a strong case for stating that the Vikings had a camp, possibly on the River Cam, when they made a major assault up the River Severn to the Midlands.

The evidence of Roman occupation mentioned above, refers to a one-day field walk in 2001 when 387 sherds and a coin of Roman origin were found including building fragments and hypocaust tile used in the heating systems of Roman buildings. The full report was published in *Glevensis*, the journal of the Gloucestershire Archaeology Society. The significance of the finds is that they indicate that there was almost certainly at least one Roman building on the site. The A38 being acknowledged as the course of the Roman road this was hardly surprising. The chairman of the Slimbridge Local History Society at the time, [REDACTED] was given permission by the tenant to simply walk the field again after 2001 and the attached photographs show further sherds which he recovered after the field walk. Amongst the sherds recovered there is clear evidence of the presence of a building or buildings on the site.

What is surprising is what has happened over the last two years.

Recent discoveries

In the summer of 2017 permission was given for a detectorist rally on land behind Lancelot Close just north and west of the church. To everyone's surprise literally hundreds of Roman coins, brooches and artefacts were found. The detectorists were given permission to conduct three more rallies at other sites in the parish before it was realised that they were simply looting most of what was being found. The location of the finds was not being recorded and the vast majority were never seen again.

The rallies were stopped and, with the kind permission of the tenant and the landowner, Berkeley Estate, the Slimbridge Local History Society (SLHS) began coordinating a project to geophysically scan and systematically metal detect three fields in the parish. It soon became apparent that not only was there a significant Roman presence in the parish but also an Iron/Bronze Age settlement on the Lighten Brook. Hundreds of Roman coins and artefacts from around the second to third century AD have been recovered along with a whole range of items associated with Roman settlement and also a small number of Iron/Bronze Age coins. A Romano British double-ditch enclosure was found in Lynch Field close to Rectory Farm along with signs of an Iron/Age roundhouse next to Lighten Brook on Lightenbrook Lane.

All the finds were carefully mapped and shared with [REDACTED] the Gloucestershire and Avon Finds Liaison Officer based at Bristol City Museum & Art Gallery. Geophysical scanning was conducted by [REDACTED] of Archeoscan. Members of SLHS provided field support to the scanning and an educational programme was started by the society with local schools and

information shared with the local community. [REDACTED] report is available from the Gloucestershire County Council (GCC) Heritage team.

Possible Unexploded WWII Munitions

One elderly resident recalls a German bomber dumping its bombs just off Dursley Road. He was in one of the six houses nearest the M5 and was sheltering under a table in one of the houses when the bombs were dropped, blowing out the windows of the houses. He recalls playing in the bomb craters but, given the overgrown nature of the soft ground at the time, he can't be sure that all the bombs exploded. He would be willing to pinpoint the location if asked.

Significance of the Discoveries

The significance of the two discoveries, Lanes End Bungalow field and Lynch field, is that they are linked by Lighdenbrook. Firstly, the brook would have been crossed by the Roman Road. Secondly, the gravel bed would have provided high quality drinking water for travellers and those living in Lynch field and, lastly, the brook would have given access to the River Severn. This almost certainly shows settlement occupation stretching between at least Lanes End Bungalow field on the Roman road and a settlement on what would have then been the banks of the River Severn and may well extend over all the land earmarked for development. The view that there is a larger archaeological landscape is enforced by aerial photographs showing distinct and as yet unexplored cropmarks in fields behind Tying Crescent which would link the two sites. This is a far larger and more significant settlement than was previously recognised.

It also seems quite possible that this was also the site of a road junction leading not only to the Roman town of Corinium, present day Cirencester, but also the River Severn. Slimbridge would have been pretty much equidistant to all three major Roman towns, Bristol, Gloucester and Cirencester, and therefore a logical place for the interchange of materials and people. You could view this settlement area as a military and civilian settlement at a crossroads which formed a vital, major location for trade, manufacturing and the import of goods from across the Roman Empire. If this so, this would be an unprecedented discovery in the Severn Vale.

Heritage Assessment

The heritage assessment conducted by Cotswold Archaeology on behalf of GCC and the ECT is accurate as far as it goes. What it does not include is the report on geophysical scanning prepared by Archeoscan on December 2019 as it was not available at the time the report was written. The sheer scale of the size of the previously unknown settlement and the enormous number of finds of Roman and Bronze/Iron Age artefacts clearly indicates prolonged settlement in the area. It is incomprehensible not to link this settlement with the finds of the same period at the development site. This is supported by aerial photographs of cropmarks between the two sites. The previous theories of a staging post at Lanes End Bungalow have been misleading. The current evidence demonstrates the presence of a major settlement close to the Roman Road on the course of the A38.

Next Steps

Before any development work is even considered the whole site needs to be thoroughly geophysically scanned and metal detected. This is far more than just an inappropriate place to build 1500 houses. This is our community's heritage and conserving, understanding and enjoying what was here nearly 2000 years ago is far more important than making a fast buck building house. A view I would expect the trustees of the ECT to hold close to their hearts now that they are fully appraised of these discoveries. It is, after all, just what their founder set out to achieve and is their duty as trustees to see his wishes fulfilled. A unique opportunity exists to educate local children and the community at large and this is something which once again I would expect ECT and even the GCC to recognize and encourage. This is work that SLHS with its limited resources has already started and wishes to continue for years to come. We would welcome support from ECT and GCC.

Desired outcome

From an archaeological viewpoint alone, this development should not go ahead.

Regardless of whether evidence of Roman or Iron/Bronze Age buildings are found it would be insensitive at least for SDC, which frequently espouses its views on the environment and the rich culture of this part of the English countryside, to ignore and desecrate a site which has remained untouched for thousands of years.

The GCC Heritage Team are encouraged to conduct a full geophysical scan of the entire site, supported by metal detection, to further establish the importance of this community's heritage.

Roman sherds recovered from the site







IDENTIFYING SUITABLE ALTERNATIVE SITES

This section addresses specific aspects relating to the need to identify suitable alternative sites in preference to the proposed site within the parish of Slimbridge.

Timing

The development within the parish of Slimbridge was not included within the original submission of the Local Plan or SALA 'Call for Sites' in 2016 or the 2017 update. It was only in the 2018 update that GCC and the ECT first submitted outline maps introducing Wisloe as a potential site for circa 1500 houses in total. The introduction of the Wisloe proposal part way through the Local Plan cycle has resulted in insufficient remaining time being available to undertake a meaningful analysis of all the alternative sites in the district. Furthermore, by the time the Wisloe site was initially proposed in 2018 numerous alternative sites had been proposed and discounted from the Local Plan. These previously discounted sites were assessed prior to the 40% increase in Government requirement being introduced in 2018. Therefore, those proposals previously discounted prior to the 2018 requirement increase should be re-evaluated in light of the more stringent demands for additional housing.

Size

The combined area for the Wisloe site is approximately 75 ha of which 75% (56 ha) is suitable for house building. Finding an alternative site elsewhere in the district for such a large proposal is not appropriate. The approach to identify alternative sites, up to say 50 houses, is appropriate for much smaller developments but the options for larger sites diminish rapidly with increase in size. The most suitable alternative to a large site of Wisloe's magnitude is therefore to distribute housing around other much smaller sites within the district (dispersal). It is considered inappropriate to apply the rule that alternative sites need to be identified for extremely large sites, like Wisloe, instead it is proposed that examples for alternative sites only need be identified. There remains an overarching requirement on SDC to find suitable alternative sites to deliver the total housing demand compliant with its own guidelines.

Sustainability Appraisal Report for the Stroud Draft Local Plan 2019 poses the questions:

SA 13.1: Does the Plan encourage the appropriate provision of housing development on previously developed land as opposed to greenfield sites?

SA 13.2: Does the Plan maximise the provision of employment development on previously developed land as opposed to greenfield sites?

SA 13.3: Does the Plan encourage housing densities which would make efficient use of land?

SA 13.4: Does the Plan ensure land is remediated where appropriate?

SA 13.5: Does the Plan reduce the loss of soil and high grade agricultural land to development?

The proposed development in Slimbridge Parish fails to meet these criteria.

More Equitable Distribution

Page 39 of the Nov 2018 Local Plan identifies Stroud District as having the following settlement structure; 4 in Tier 1, 5 in Tier 2, 12 in Tier 3a, 11 (including Slimbridge) in Tier 3b, 5 in Tier 4 and 16 (including Cambridge) in Tier 5. A more equitable additional housing allocation is shown below.

Stroud District Settlement Distribution (Nov 2018)			
Tier	No of settlements	Proposed Equitable Housing allocation	Total
1	4	1500	6000
2	5	600	3000
3a	12	200	2400
3b	11	100	1100
4	5	50	250
5	16	25	400
		Sum total	13150

This more equitable distribution (dispersal) achieves the target housing requirement of 12760 over the next 20 years. Using this allocation Slimbridge will have to find the sites for 100 houses and Cambridge will have to accommodate 25 houses, which is far preferable to the 1500 dwellings planned for Wisloe. The other larger Tier 1 and 2 settlements will have to take their 'fair share' of additional housing to reflect their size within the district. An example of a suitable site within the Slimbridge parish is the proposal for 50 houses behind Tynning Crescent (ref SLI003). This proposal would not generate any of the major issues associated with the Wisloe proposal and would undoubtedly be fully supported by the parish. This proposal would be fully in-keeping with maintaining the village identity and would also avoid coalescence. It would also be feasible for some of the previously developed brown field land proposed for the Wisloe development to be used to help achieve this revised requirement. For example, the GCC owned land near the stables at Wisloe would be a suitable site for circa 75-100 houses and would not really impact Slimbridge or Cambridge. This would fulfil the proposed total village allocation for the next 20-years and avoid coalescence.

Any significant housing development identified, which is more compliant with the Local Plan policies e.g. nearer to M5 junction and employment on a brown field site etc, could be included within the Local Plan to help offset some of the more challenging allocations above. Significant development proposals in the areas of Moreton Valence and Standish have previously been proposed and discounted, these should be reassessed. There is also a current proposal to redevelop the site at the old Standish Hospital (150 dwellings). This brownfield site should be developed in preference to a green field site, particularly as it is close to employment, services and road networks.

To achieve this more equitable housing allocation it is proposed that a full review be conducted of all development sites (both accepted and rejected) in light of the 2018 Government increase which was introduced part way through the Local Plan cycle.

This approach would assist SDC to achieve its own NPPF target that at least 20% of the sites allocated for housing through the Local Plan should be half a hectare or smaller.

This appears not to be the case overall and is certainly not the case since the 40% increase requirement was introduced part way through the planning cycle which has majored all additional development on Wisloe/Cam and Sharpness.

Consistency

An analysis of the SALA Appendix 4 (site rejections) data has been undertaken, the results are shown below.

Reasons for Rejection	Beyond T123, not assessed	Double counting	Active use, not available, community asset	Narrowing gap, coalescence, loss of green buffer	Loss of view, visible	Setting of village, landscape sensitivity	Rural character	Harm to local heritage	Hilly	Listed buildings	Extension into countryside	Lack of facilities & infrastructure	Wildlife site	Flood risk	Lack of employment	Outside settlement boundary	Relates to another proposal	Access	Too small	Archaeology	AONB	Total
2017	22	11	26	29	14	8	11	8	16	6	2	2	6	13	0	16	0	6	4	1	30	231
2018	3	1	1	7	6	2	5	7	2	3	1	2	2	1	1	1	0	0	0	0	0	45
2019	4	0	1	12	6	1	6	3	1	9	4	1	0	1	0	4	1	0	0	0	10	64
Total	29	12	28	48	26	11	22	18	19	18	7	5	8	15	1	21	1	6	4	1	40	340

Grey = discounted, green= equally applicable to Wisloe, yellow= not applicable to Wisloe.

Of the 237 rejections 175 (74%) were rejected before the increased governmental targets were introduced. Of the general reasons for rejections (multiple/rejection) 74% are considered equally applicable to the proposed Wisloe development. The two main reasons for rejection which would not apply to the Wisloe proposal are AONB and a hilly topography. It appears a large proportion of the AONB rejections were for the Stroud area despite Stroud being a Tier 1 town. Stroud needs to take its 'fair share' of new housing as it is the largest town in the district, despite it being in the AONB region. The data suggests a lack of consistency in application of the reasons for rejection, this needs to be applied in an even-handed manner. If the Slimbridge site were to remain a viable option in the Local Plan, then the same rules should be consistently applied to those proposals which have already been rejected from the Draft Local Plan.

Summary

The WAG assessment of aspects relating to 'alternative sites' concludes the Slimbridge site proposal should be rejected on the grounds that:

- There is insufficient time to identify alternative sites as the Wisloe proposal was introduced part way through the planning process.
- It is not necessary or appropriate to identify alternative sites for 1500 houses due to the very large size of the Wisloe proposal. Identification of alternative sites is only an appropriate requirement for much smaller proposals.
- A more equitable additional housing requirement can be achieved by dispersing the housing requirement around the district. There are numerous alternative smaller sites which have been previously rejected, many before the governmental increase was introduced in 2018, which could help achieve the total housing requirement.
- SDC appears to have not applied its own planning decisions in a consistent manner, previously rejected sites should be reassessed to identify opportunities to help spread the housing requirement load more equitably across the district (dispersal).

WATER QUALITY

There are well known issues with the quality of the drinking water within Slimbridge Parish and the Sustainability Appraisal Report identifies that Drinking Water Safeguarding Zones are present in the River Cam and the surrounding areas.

Sustainability Appraisal Report for the Stroud Draft Local Plan 2019:

SA 11: To maintain and enhance the quality of ground and surface waters and to achieve sustainable water resources management in the District.

SA 11.3: Does the Plan minimise inappropriate development in Nitrate Vulnerable Zones, Drinking Water Safeguard Zones and Source Protection Zones?

The answer is no because the report very worryingly goes on to states the following: -

4.68 Drinking Water Safeguarding Zones are present in the District around Cam where a high level of strategic growth is to be accommodated. A high level of growth in this area could adversely impact water quality in the area.

5.28 Only the new settlement at Wisloe is expected to have an adverse impact on water quality in the District given that it lies within an SPZ. As such a significant negative effect is expected in relation to SA objective 11:

Conclusion

It is clear that there SDC and the developers are aware of a with water quality problem for the Proposed development within Slimbridge Parish. The residents of Slimbridge Parish are very concerned about this particularly when considering the total growth of over 4000 homes between Slimbridge and Cam Parishes in a Drinking Water Safeguarding Zone.

EXECUTIVE SUMMARY

The Wisloe Action Group has objectively assessed the Stroud District Local Plan Review, Draft Plan for Consultation, November 2019, with particular emphasis on the PS37, Wisloe Garden Village proposal.

The Group has revealed numerous shortfalls in planning, contraventions of sustainability principles, misleading and incomplete supporting assessments, all of which are set out above.

It seems the opportunity to achieve a quick win on planned government targets was too much of a temptation and has resulted in a rushed and ill-thought-out proposal.

This proposed settlement dwarfs its parent parish. The proposal quadruples the population and housing stock of Slimbridge by imposing a dormitory settlement offering no benefits and countless drawbacks.

The Ernest Cook Trust, Gloucestershire County Council and Stroud District Council are all prepared to turn a blind eye to their espoused principles of community, sustainability and preservation of the countryside to force through this proposal.

Ernest Cook, founder of his trust, would be horrified to know that his precious country estate was to be exploited in such a fashion for financial gain.

Stroud District Council planning department would have us believe they can find no alternative which does not speak well of its capabilities.

We find it hard to envisage how prospective buyers could possibly buy the garden village description when they are hemmed in by the M5, A38, A4135, a major railway line and find their homes are under pinned and bisected by a high-pressure gas pipeline. Their place of work, their children's schooling and their services and facilities will prove inadequate and generate many miles of car driving, and the resulting pollution, to reach.

Wisloe Garden Village, a misleading description if there ever was one, should be rejected by our elected representatives in order to preserve the reputation of their district.

No to Wisloe Village



LANDSCAPE (Supplementary Document)

Slimbridge Parish is a rural area on the Severn Plain and as such is flat with wide open views across the Forest of Dean and to the Black Mountains beyond; this with the Cotswold escarpment which forms a magnificent backdrop for the whole parish.

Stroud District Landscape Sensitivity Assessment 2016

The Draft Local Plan states “The area is beyond the immediate vicinity of Cam and Slimbridge and was therefore not included in the Stroud District Landscape Sensitivity Assessment (which focussed on land surrounding the District’s existing settlements).”. It is not clear why this whole of Slimbridge Parish was not included as this site clearly affects the whole and not part and request the SDC provide detailed and evidence-based reasons for excluding the proposed site around the time of discussions with developers.

However SDC’s Landscape Sensitivity Assessment

<https://www.stroud.gov.uk/media/240802/stroud-landscape-sensitivity-assessment-part-1.pdf> states;

3.49. The preferred direction for housing growth for Slimbridge is to the south west in land parcel S103 where there is an opportunity to improve the settlement edge to become more planted and indented.

3.50. The landscape parcels around the settlement are all generally considered to be of high sensitivity to employment uses and offer limited opportunity for allocation in terms of landscape and visual factors. **The land parcels adjoining the A38 are slightly less sensitive but development here would still adversely affect views to the church spire and/or receptors in the settlement and is undesirable.**

Table 2 Summary of landscape sensitivity of land parcels (page 16 extract)

Settlement	Land Parcel	Sensitivity to Housing	Sensitivity to Employment
Slimbridge	S101	High/medium	High
Slimbridge	S102	High/medium	High/medium
Slimbridge	S103	Medium	High/medium
Slimbridge	S104	High/medium	High
Slimbridge	S105	High/medium	High

Impact on views from the Area of Outstanding National Beauty (AONB).

The nearest part of the AONB is at Stinchcombe Hill approx. 1.5km away. The proposed Slimbridge site (combined with Cam) will ruin views from both the Cotswold and Forest of Dean AONBs in stark contrast to SDC’s commitment to protect these areas and views.

There are many places both within and outside the of the Slimbridge Parish where beautiful and unique views are enjoyed. Identified ‘Valued Views’ are recorded and given extra significance and protection through a planning policy.

The distinct topography means that there are frequent views from the surrounding landscape to the Slimbridge Parish and vice versa. There is a strong visual connection to it. From some elevated positions within the parish there are panoramic views of the surrounding landscape including the built settlement.

Slimbridge Village Design Statement

<https://www.stroud.gov.uk/media/241059/2016-12-final-slimbridge-village-design-statement.pdf>

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. As mentioned in the statement, "When we see Slimbridge Spire we know we are home." Note - St John's Church is Grade 1 Listed.

SLN 4 To maintain the identity of the flat and marsh land areas, buildings should be of a good design that will not detract from this setting. The flat and open nature of the marshes make them sensitive to development. Relating to Stroud District SPG Landscape Character Assessment 2000.

Harm on this scale completely outweighs any perceived benefit. For this reason, the proposed Slimbridge site should be removed from the Draft Local Plan.



Appendix *

Slimbridge Parish Council

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

Website: www.slimbridge-pc.gov.uk

December 2020

Slimbridge Parish Council response to the Additional Housing Options paper

Slimbridge Parish Council will respond to the paper by answering each question within this report.

Slimbridge Parish Council has contracted JB Planners to assist with advice in putting together the following responses.

Before addressing the questions Slimbridge Parish Council wish to note the future housing requirements with reference to the fact that in August 2020, the Government published a consultation document 'Changes to the current planning system' which proposed changes to the way the Government calculates the minimum housing requirement for each local authority area in the country. It is noted that this revised standard method has proposed increasing the requirement for Stroud District from the level set out in the 2019 Draft Local Plan of 638 houses per annum to 786 houses per annum, indicating SDC will have to find land for an additional 1050 – 2400 homes between now and 2040.

It needs to be emphasised that there is currently considerable uncertainty regarding future housing provision requirements at district level. It now appears to be the case that the Government will be re-evaluating its earlier proposals. There have been indications that efforts will be made to re-focus some of the proposed growth towards cities and areas of the country requiring significant regeneration.

Consequently it would be wrong for the District Council to automatically assume that the much higher annual housing requirement will actually be required.

Question 1: Which strategy option(s) would you support, if additional housing land is required?

Slimbridge Parish Council would support Option E – a hybrid / combination option

Question 2: Please explain which of the spatial options you would like to see combined in a hybrid strategy, and why?

Slimbridge Parish Council would support a combination of options A, B, C and F

With Option A, the urban extensions identified total 2,280.

- CAM North West – 700

- CAM North East – 180
- Hunts Grove Extension – 750
- Stonehouse Northwest – 650

The consultation paper suggests that these have planned average densities of around 30 dwellings per hectare (dph). If the average density of these urban extensions is increased from 30dph to 35 dph, which is typical for edge of settlement urban extensions, these allocations could potentially deliver 380 more homes (in total), as identified below:

- CAM North West – 117 additional
- CAM North East – 30 additional
- Hunts Grove Extension – 125 additional
- Stonehouse Northwest – 108 additional

If this was then combined with the sites the Council have identified under Option B (which we understand to be those listed in question 7 which provide a further 115 homes) then around 500 new homes could be delivered.

Option C, growth points at Whitminster and Moreton Valence, providing a further 2,250 and 1,500 (combined total of 3,750 new homes) would be supported.

Along with Option F, where Slimbridge Parish Council also consider that SDC should adopt a brownfield first approach to future housing provision (i.e. Option F). Regard must be had to the NPPF, which stipulates at paragraph 117 that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.

We note that the Stroud Five Year Housing Land Supply (August 2019) identifies that historic evidence demonstrates that small site windfall deliveries have averaged 75 dwellings per annum.

Furthermore, it is evident from Tables 4A-D (Actual and Potential Loss of B-Use Employment Land) that significant amounts of brownfield housing provision have been, and are likely to continue to, come forward from current and former employment sites. The District Council's development strategy must seek to maximise brownfield development opportunities in order to reduce the need for development needing to occur on greenfield sites.

Question 3: Do you support the approach of identifying a reserve site or sites, if housing development on the sites that will be allocated in the Local Plan should fail to come forward as envisaged?

Slimbridge Parish Council do not believe that it is either necessary or desirable to identify a reserve site. Instead, the Parish Council believes that SDC should ensure that suitable and deliverable sites are identified from the outset in the Draft Local Plan.

It is felt that SDC's proposed strategy could be dependent on too many new major developments within one particular area, and it needs to be recognised that only so much development is capable of being delivered at the same time within one area. It is therefore felt that the removal of Wisloe Green (PS37) would help alleviate the risk, with replacement provision, such as Whitminster and Morton Valence, being identified elsewhere in the district, where market absorption would not be an issue.

Furthermore, with regard to the need for any reserve site, it is believed that SDC is required to review its Local Plan at least every five years, so any delivery concerns would be able to be reviewed through this process.

Question 4: Which strategy option(s) would you support, if a reserve site (or sites) is required?

Based on the response in question 3, Slimbridge Parish Council, do not support reserve sites.

Question 5: N/A

Question 6: What should trigger a reserve site (or sites) coming forward?

Slimbridge Parish Council do not believe that the identification of any reserve sites is necessary. Consequently, there will be no need for any such triggers

Question 7 Do you support or object to the development of the sites identified?

- **7a BER016 Hook Street Farm, Berkeley**
- **7b BER017 Bevans Hill Farm, Berkeley**
- **7c HAR017 Land at Sellars Road, Hardwicke**
- **7d STR065 Beeches Green Health Centre**
- **7e WHI012 South of Hyde Lane, Whitminster**

Slimbridge Parish Council supports these small to medium sites that have a capability of delivering 115 new dwellings, based on the requirement of paragraph 68 of the NPPF for local planning authorities to recognise the important contribution that small and medium sized sites can make to meeting the housing requirement of an area, as can often be built relatively quickly.

Paragraph 68 identifies “to promote the development of a good mix of sites local planning authorities should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved”.

Question 8 Are there any other sites that you would like to be considered for future housing development?

No

Question 9: Do you support or object to the development of the potential growth points identified, or any sites therein?

- **9a PGP1 Land at Grove End Farm, Whitminster. Including SALA sites WHI007 and WHI014**
- **9b PGP2 Broad location at Moreton Valence / Hardwicke. Including the SALA sites HAR015, HAR016, HAR006, HAR007, HAR008 and HAR009**

Please explain why you support or object to the development of these broad locations. If your comments relate to a specific site within the broad growth area, please reference the SALA(s) site number

Slimbridge Parish Council supports both of the above sites as growth points.

Both Hardwicke (PGP2) and Whitminster (PGP1) are in Tier 3a, which are classified as *“generally well-connected and accessible places, which provide a good range of local services and facilities for their communities. These villages benefit from their proximity and/or connectivity to higher tier settlements or transport corridors, which enables access to employment and key services and facilities elsewhere, and which may offer some scope for further transport and accessibility improvements”* as per the statement in the draft Local Plan. These sites are therefore in a tier more suitable to accept a growth point than Wisloe Green (PS37) which is in Slimbridge Parish and classified as Tiers 3b and 4 (Slimbridge and Cambridge) which is stated to have limited facilities and poor access to key services.

Both Hardwicke (PGP2) and Whitminster (PGP1) are not going to have any significant impact on merging different parishes into one and coalescing of communities, which the Parish Council believe is a high concern for Wisloe Green (PS37) coalescing with Cam and Dursley, and therefore in danger of both Slimbridge and Cam losing their identity becoming one urban sprawl instead of the small rural community that it currently is.

With regards to land usage, both Whitminster (PGP1) and Hardwicke (PGP2), whilst included in the 7.7km catchment zone of the ‘Strategy for Avoidance of Likely Significant Adverse Effects on the Severn Estuary SAC, SPA and Ramsar Site’ document, are not as close to a large wildlife area, e.g. the WWT, and therefore will have less impact on wildlife and the surrounding protected sites.

Both Whitminster (PGP1) and Hardwicke (PGP2) only have moderate to good agricultural soil, compared to very good agricultural soil, at the Wisloe Green (PS37) site, making PGP1 and PGP2 more sustainable to develop on and not losing land to farming potential on very good agricultural land. This is demonstrated on the Natural England website on an Agricultural Land Classification map for the South West.

For traffic and road infrastructure, both Hardwicke and Whitminster are closer to the M5 with junctions 12 and 13 very accessible with train stations in Stroud and Stonehouse accessible on commuter routes. Wisloe Green (PS37) is further away from these junctions and employment site, therefore making it less sustainable and the need to travel further higher.

Question 10: *Are there any other sites that you would like to be considered as a future growth point?*

No

Question 11: *Do you have any comments to make about the Sustainability Appraisal that accompanies this consultation document*

Slimbridge Parish Council recognise the need for the Sustainability Appraisal (SA) for these sites and would request that before the final Local Plan goes out to consultation in the Spring, all the major growth points would be assessed alongside each other using the same methodology for each sites, so as a fair comparison can be made in their sustainability aspects.

The Parish Council support the A419 as the most sustainable of the 3 travel routes.

Growth points should ideally be sited near employment regions which will therefore minimise travel for work purposes. Therefore growth points situated on the major link roads close to the larger settlements of Stroud / Stonehouse and Gloucester are more self-contained than

those further afield such as Wisloe Green (PS37) which has less access to employment and will result in higher commuter journeys.

From looking at the 2 new growth points in comparison to Wisloe Green (PS37), the Parish Council wish to raise the following comments:

- SA5 Noise pollution – the topography of Wisloe Green (PS37) demonstrates varying height levels in relation to the M5, the railway line and the A4135 flyover and will have a significant impact on noise levels for this growth point compared to the Whitminster (PGP1) and Hardwicke (PGP2) growth points that have more natural sound barrier with the way the land lies in those areas.
- SA8 Conserving character and distinctiveness – the development of a growth point at Wisloe Green (PS37) is not a stand alone development as it would result in coalescence of parishes, joining Slimbridge Parish with Cam Parish, and therefore becoming one urban extension resulting in a loss of its rural identity and character.
- SA9 Conserving historic environment – a number of archaeological digs have occurred within Slimbridge recently by the local history society, identifying many archaeological items. Wisloe Green (PS37) is likely to be no different, and with the recent discovery of the Roman Villa in Cam, just a short distance away, the site would require significant consideration to its historical value in the community, with a suspected presence of further Roman buildings on site.
- SA10 Air quality – with Wisloe (PS37) based in the rural south of the district and therefore likely more commuter travel will be required than at Hardwicke (PGP2) or Whitminster (PGP1), it is likely to produce the worst air quality outcome with higher pollution from car usage as being further away from employment sites.
- SA11 Water quality – the Sustainability Assessment fails to state that Wisloe Green (PS37) falls entirely within a Drinking Water Safeguarding Zone, as opposed to being near one.
- SA12 Flood risk – it is disappointing to see that this document says about Wisloe (PS37) being mostly free of higher flood risk as there seem to be no background research done on the past years of Slimbridge Parish Council and local parishioners (with very local knowledge) working with Gloucestershire County Council and Severn Trent Water on the parish wide flooding issues and the lack of capacity of the sewage works for the area. Whilst much work and monies have been put into rectifying these issues, the area is still under review by STW with regards to the effects of sewage capacity and dealing with surface water flooding. Therefore it is believed that significant more in depth studies are required on this and these should include professional site surveys.
- SA13 Protection of soil quality – It is believed that Wisloe Green (PS37) is of Grade 2 quality soil and should therefore be protected, as this is of high quality with little of this soil elsewhere in the district. Evidence of this has been mentioned in the above paragraphs under Q9.
- SA16 Employment – whilst some employment will be included at Wisloe Green (PS37) it is still likely that this site will result in higher commuting to access jobs at the main employment centres which are more accessible by having growth points at Whitminster (PGP1) and Hardwicke (PGP2).

Slimbridge Parish Council overall concludes that a hybrid approach is likely to be the best sustainable option that will achieve the required housing numbers for SDC. The Parish Council believes that large scale growth points are more sustainable on the travel routes of C1 (A38) and / or C2 (A419) rather than at C3 (A4135).

The Parish Council believes that the 2 new growth points at Whitminster (PGP1) and Hardwicke (PGP2) are more sustainable than the growth point at Wisloe Green (PS37) with the main reasons being:

- Commuting miles for employment
- High quality soil
- Coalescence
- Archaeological and historical sensitivity
- Noise and air quality
- Flood risk and water quality.


Clerk to Slimbridge Parish Council

16th December 2020



Appendix +



To: Stroud District Council

From: Wisloe Action Group (WAG)

Date: 16th December 2020 (emailed)

Introduction

This document is submitted by Wisloe Action Group (WAG) in response to the Stroud District Local Plan Review Additional Housing Options Public Consultation October 2020. 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 the recently submitted development site proposals; in particular the two Additional Growth Points (AGP) at Moreton Valence / Hardwicke and Whitminster and the Sustainability Assessment evidence.

The major justification for Stroud District Council (SDC) undertaking the spatial review is in response to the Planning for the Future Whitepaper issued in August 2020 which '*proposed changes to the way Government calculates the minimum housing requirement for each Local Authority*'. For SDC, '*current monitoring indicates we may have to find land for an additional 1,050 – 2,400 homes between now and 2040*'. Recognising that Government is now re-assessing its position to address the levelling up between the North and the South, WAG questions the need to achieve a target number of dwellings in excess of the original target detailed in the 2019 Draft Local Plan consultation. WAG recognises the proposed Additional Growth Points sites need to be consulted upon, as they emerge, as part of the standard planning process and could form a significant part of the emerging plan.

This document from WAG comments on the Additional Spatial Options, and new housing development proposals and the SA before detailing its conclusions.

1.1 Spatial Options for Additional Housing Land

Question 1 asks "which strategy option(s) would you support, if additional housing land is required?"

Option A – Intensify (urban proposed sites)

Option B – Towns and villages

Option C – Additional growth point

Option D – Wider dispersal

Option E – Would you support a hybrid / combination option?

WAG SUPPORTS Option E - a hybrid / combination option

Q1f Option F – Another strategy

WAG SUPPORTS a Brown Field first approach to site selection.

Q2 Rationale Supporting Hybrid Strategy

WAG SUPPORTS a hybrid combination of Options A, B, C and F.

With Option A, the ‘*strategic urban extension sites*,’ identified as red circles in the illustration, identified a total of circa 2,280 proposed dwellings:

CAM North West – 700 dwellings

CAM North East – 180 dwellings

Huntsgrove Extension – 750 dwellings

Stonehouse Northwest – 650 dwellings

The consultation paper suggests the proposed urban development sites have planned average densities of around 30 dwellings per hectare (dph). If the average density of these urban extensions is increased from 30dph to 35 dph, which is typical for edge of settlement urban extensions, these allocations could potentially deliver 380 more homes (in total), as identified below:

CAM North West – 117 additional dwellings

CAM North East – 30 additional dwellings

Huntsgrove Extension – 125 additional dwellings

Stonehouse Northwest – 108 additional dwellings

The average densities per hectare could be increased to 35 by changing the mix of dwelling type rather than increasing the same type of dwellings per hectare on the same site.

Option B is a strategy to distribute the housing load more evenly throughout the district, albeit to primarily towns and larger villages. WAG supports this limited level of housing dispersal as it helps to remove undue significant reliance on realising the majority of new dwellings in the Severn Vale. WAG is therefore supportive of new housing proposals in Q7 which could deliver an additional 115 homes. The additional dwellings calculated under options A and B combined could deliver an additional 500 dwellings.

Numerous relatively small housing developments around the edges of towns and major villages can also limit the dependency on the need for significant additional infrastructure as existing facilities can be utilised, as well as existing employment being closer to the dwellings.

Option C proposes AGP's to help fill the housing demand requirement. The major conclusion from the spatial assessment undertaken for SDC earlier this year was that probably three separate AGPs would be required to help achieve the increased total housing target as part of a hybrid solution. The 2019 Local Plan consultation detailed several proposed AGPs (including PS37) and this latest 2020 consultation introduces two more. All the proposed AGPs, which have been consulted upon individually, will need to be assessed and compared to determine their relative sustainability, deliverability and viability prior to recommendations made to the Environment Committee, Full Council and a decision made prior to the pre-submission 2021 Local Plan consultation. WAG has reviewed the site assessments for the two new AGP submissions contained in the 2020 SA and our findings are detailed in the WAG submission in answer to Q11.

WAG also agrees with the findings from the site reviews, and WAG's own assessment, that proposed site PS37 is less sustainable, deliverable, and viable than the two new AGPs and other sites included in this consultation (PGP1 & PGP2).

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Option D is broadly Option B plus further small sites at Tier 4 villages and is unlikely to add significant housing numbers in view of limited potential for growth in smaller villages. Also, the consultation document identifies that adoption of this Option would trigger the need for SDC to look for more sites and carry out further consultation. This could result in a significant delay to the submission of the Local Plan. The current spatial consultation is focused on additional housing allocation only, it is not an entire review of the existing strategy. To date, WAG has been vocal in advocating wider dispersal of housing across the district to achieve a more even distribution, rather than to focus too heavily on the Severn Vale. Dispersal options should have been considered much earlier in the local plan process following feedback from previous consultations as this was the preferred option. WAG still maintains this view but recognises the need to get a Local Plan agreed and that a change in approach for 'additional housing' only will not generate the necessary change in strategy required from SDC. To avoid delaying submission of the Local Plan, WAG suggests SDC also reviews option D in parallel with the existing housing spatial strategy (but not to delay the local plan) to identify scope for any additional housing projects more widely throughout the district.

WAG propose that SDC should adopt a brownfield first approach to future housing provision (i.e. Option F). Regard must be had to the NPPF, which stipulates at paragraph 117 that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land. Focus should initially be centred around realising brownfield land before proposing a site that have the Best and Most Versatile Land which will be lost forever. Building on the highest quality agricultural land in the district is in conflict with to Stroud's commitment to CN2030 and need for greater self-sufficiency resulting from Brexit.

The Stroud Five Year Housing Land Supply (August 2019) identifies that historic evidence demonstrates that small site windfall deliveries have averaged delivery of approx.75 dwellings per annum. It is evident from the Employment Land Availability report (<https://www.stroud.gov.uk/media/1287101/ela-2020.pdf>) Tables 4A-D (Actual and Potential loss of B-Use Employment Land) that significant amounts of brownfield housing provision have been, and are likely to continue to come forward from current and former employment sites. These additional sites could deliver circa 450+ additional dwellings which do not appear to be taken into account in the existing target numbers of dwellings with the draft Local Plan numbers. SDC's development strategy must seek to maximise and prioritise brownfield development near to existing employment in order to reduce the need for development needing to occur on greenfield sites. The long-term impact on employment sites and reduced working in offices is not yet know, but it is likely that an increase to employment land will not be as significant as previously planned.

Therefore, in order to ensure that the target dwelling numbers are met and to provide the flexibility required for SDC to assess a range of options WAG is supportive of a hybrid approach which combines options A, B, C and F.

1.2 Spatial Options – Reserve Housing Supply

Q3 NO, WAG does NOT SUPPORT the approach of identifying a reserve site or sites. WAG does not believe that it is either necessary or desirable to identify a reserve site. To do so would create undue uncertainty in the selection of any identified sites. Instead, WAG believes that SDC should ensure that the most suitable, sustainable, deliverable, and viable proposed sites are selected from the outset in the Draft Local Plan. The biggest weakness of SDC's last proposed strategy is its dependence on too many major new developments within one particular cluster in the Severn Vale. It needs to be recognised that only so much development is capable of being delivered at the same time within any one area. This would lead to land banking and sites not delivering against the plan.

Limiting the development to AGPs at extreme ends of the district would help alleviate the risks of under-absorption, with replacement provision identified elsewhere in the district, where market absorption would not be an issue.

Furthermore, with regard to the need for a reserve site, WAG would point out that SDC is required to review its Local Plan on at least a five-yearly basis, therefore any delivery concerns could be addressed through this process.

Q4 As WAG does NOT SUPPORT a reserve site(s) then none of the options identified in Q4 are supported. See response to Q3.

Q5 No hybrid reserve housing strategy is supported as WAG does NOT SUPPORT a reserve site(s). See response to Q3.

Q6 WAG does NOT SUPPORT a reserve site(s) and therefore a trigger is not required, it is an academic question.

2.1 New Housing Sites

Q7 WAG broadly SUPPORTS development of the 5 smaller proposed sites at:

- 7a BER016 Hook Street Farm, Berkeley
- 7b BER017 Bevans Hill Farm, Berkeley
- 7c HAR017 Land at Sellars Road, Hardwicke
- 7d STR065 Beeches Green Health Centre
- 7e WHI012 South of Hyde Lane, Whitminster

The sites are all small to medium scale in size (ranging from 15 to 45 dwellings) and capable of delivering 115 dwellings in total. This is consistent with supporting the option B spatial strategy. Paragraph 68 of the NPPF requires local planning authorities to recognise the important contribution that small and medium sized sites can make to meeting the housing requirement of an area, as they are often built-out relatively quickly. Paragraph 68 requests councils '*to promote the development of a good mix of sites local planning authorities should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved*'.

Q8 No, WAG is not aware of any other site(s) which could be considered for future housing development within this local plan.

2.2 Potential Growth Points

Q9 WAG SUPPORTS the two proposed growth point developments at:

- 9a PGP1 Land at Grove End Farm, Whitminster. Including SALA sites WHI007 and WHI014.
- 9b PGP2 Broad location at Moreton Valence / Hardwicke. Including SALA sites HAR015, HAR016, HAR006, HAR007, HAR008 and HAR009.

The sites are sustainable, viable and deliverable within this local plan.

WAG has reviewed the site assessments presented as evidence for these two new AGP submissions contained in the 2020 SA.

Proposed site PS37 is far less sustainable than both sites for the following reasons:

- Further from the main centres of employment, distance to M5 junctions and a higher dependency on commuting journey miles (SA2).
Note – Area 49 (PS37) is calculated to have 22088 jobs within 45 mins and a low number of jobs are accessed via public transport vs 92059 and high jobs access for area 41 (PGP 1 and 2).
Loss of predominantly Best and Most Versatile (MBV) Grade 2 agricultural land, highest quality in the district and very limited across the District. Note – The Promoters evidence presented an independent soil survey has been proven to be of insufficient standard to be considered for re-grading. The land quality remains at Grade 2 recorded with Natural England.
Promoter plans are not to move the high-pressure gas pipeline. This results in a considerable additional constraint (vs other growth points) resulting in an inability to convert large areas of the site for housing due to the safety constraints posed by the pipeline's proximity to the M5, rail line, A38 and A4135. (SA13).
- Proposed site PS37 will lead to coalescence within the Parish and with Cam and Dursley. It would not be a stand-alone development. It would be an urban extension beyond the parish boundaries of Cam. (SA8).
- Surface walk finds alone confirm the likely presence of at least one and possibly more Roman buildings on the proposed PS37 site. Gloucestershire County Council Heritage Team are aware of the sensitivity of the site (SA9).
- The topography of proposed site PS37 being circa 25 feet lower than the M5 (which runs the full length of the site), bisected by the rail line (raised and ground level) and 40' beneath the A4135 / M5 flyover results in the site suffering from a range of significant noise issues. Other potential AGPs by comparison are further from the M5 / railway line or the M5 runs through a cutting to provide natural acoustic shielding etc (SA5).
- Close proximity to major transport links (M5, A38, A4135 and rail network) coupled with the highest commuter mileage option produces the most undesirable air quality outcome (SA10).
- The same topographical issues result in the proposed PS37 site region, including Cambridge and Slimbridge villages, being susceptible to surface water and sewerage flooding. Furthermore, the inadequate desktop consultation failed to mention this or the recent attempts at reducing both types flooding undertaken by Gloucestershire County Council and Severn Trent Water which have only partially reduced the threat. Given the very high-water table, suggestions that SUDs on proposed site PS37 can solve the surface water flooding problem without inundating existing settlements is wishful thinking (SA12).
- The Slimbridge and proposed PS37 site area in particular falls entirely within a Drinking Water Safeguarding Zone, as opposed to being near to one.

- Although it was not raised in the consultation SA, Assessment Area 49 of the 'Strategic Growth Option Report' also confirmed the entire proposed PS37 site will require sterilisation of mineral resources prior to development.
- The numerous infrastructure constraints including the high-pressure gas pipeline which the HSE states "No Build" results in proposed PS37 site being unviable and undeliverable.

WAG is of the opinion that many of these issues were not recognised and assessed fully during the SA assessment. These points are detailed more fully in the WAG submission in response to Q11 for part 3 of the consultation.

Q10 No, WAG is not aware of any other site(s) which could be considered for future housing development within this local plan.

Q11 Comments on the Sustainability Appraisal that accompanied the consultation document

The Sustainability Assessment commentary mirrors the SA structure, commenting separately on the Additional Spatial Options and New Growth Points before outlining conclusions.

Additional Spatial Options

- 1.26 The A419 is *'the most sustainable'* of the three option C cases as set out in SDC's evidence documentation.
- 1.27 Option C1 (A38) is a relatively long road compared with the other two roads and it is therefore difficult to apply each of the SA criteria appropriately. All villages located on the A38 allow for the continuous flow of traffic to the major M5 junctions, which also provides overflow capacity should the motorway become blocked. WAG believes future developments should maintain this overflow capability. Junction 14 of the M5 is already over capacity. The proposed new AGP's adjoining Junctions 13 & 12 provide direct access to the motorway network. The Whitminster AGP provides access to the existing Stonehouse rail station and the Stroud Water rail station re-opening supported by Stroud District Council and Stroud's MP, Siobhan Baillie, and the local community. Both Stonehouse rail stations are easily accessible by cycle (including canals network), public transport supported by Stagecoach and road.
- 1.29 Assessment of AGPs should be influenced heavily by the net sustainability effects of their respective locations as the *'benefits relating to these issues are likely to be outweighed by the increased need to travel in the plan area'*. AGPs should ideally be sited as near as possible to the major employment regions to minimise commuting, recognising the limitations in public transport and access to M5 junctions.

New Growth Points

The major conclusion from the spatial assessment was that probably three separate AGPs would be required to help achieve the increased total housing target as part of a hybrid solution. The 2019 Local Plan consultation detailed several AGPs (including PS37) and this latest 2020 consultation introduces two more. All the proposed AGPs, which have been consulted upon individually, will need to be finally compared to determine their relative sustainability attributes before being sent out for final consultation in the 2021 Local Plan. WAG has reviewed the site assessments for the two new AGP submissions contained in the 2020 SA and would like to bring to your attention the following points which demonstrates that PS37 is a far less sustainable AGP site than others:

- Further from the main centres of employment and the engine room of Stroud, distance to M5 junctions and a higher dependency on commuting journey miles (SA2).

Note – Area 49 (PS37) is calculated to have 22088 jobs within 45 mins and a **low** number of jobs are accessed via public transport vs 92059 and **high** jobs access for area 41 (PGP 1 and 2).

- PS37 is made up of predominantly Grade 2 agricultural land, the Best and Most Versatile Land in the district (NPPF para 170). BMV land is extremely scarce in the Stroud District. The Promoters independent soil survey should be removed from the local plan evidence as the report has been brought into question. The Agricultural Land Classification remains at Grade 2 as set out by Natural England.
- The proposed development will coalesce the hamlets and villages in the Parish, as well as Cam & Dursley. It would essentially be an urban extension beyond the parish boundaries of Cam. (SA8)
- Surface walk finds alone confirm the likely presence of at least one and possibly more Roman buildings on the PS37 site. Gloucestershire County Council Heritage Team are aware of the significant sensitivity of the site (SA9).
- The topography of proposed site PS37 being circa 25 feet lower than the M5 (which runs the full length of the site), bisected by the rail line (raised and ground level) and 40 foot beneath the A4135 crossing over the M5 results in the proposed site having acoustic and pollution issues, as identified in the Proposers evidence which does not have a resolution. Other proposed AGPs by comparison are further from the M5 and the railway network or the M5 runs through a cutting to provide natural acoustic shielding etc (SA5).
- Close proximity to these major transport lines coupled with the highest commuter milage option produces the most undesirable air quality outcome (SA10)
- The same topographical issues result in the PS37 region, including Cambridge and Slimbridge villages being susceptible to surface water flooding. Furthermore, the inadequate desktop consultation failed to mention this or the recent attempts at reducing sewage and surface flooding undertaken by Gloucestershire County Council and Severn Trent Water which have only partially reduced the current threat. Given the very high-water table, suggestions that SUDs on PS37 can solve the surface water flooding problem without inundating existing settlements is wishful thinking (SA12).

- The Slimbridge Parish and proposed site the proposed site PS37 in particular falls entirely within a Drinking Water Safeguarding Zone, as opposed to being near to one.
- Although it was not raised in the consultation SA, Assessment Area 49 of the ‘Strategic Growth Option Report’ also confirmed the entire site will require sterilisation of mineral resources prior to development.
- The numerous infrastructure constraints including the high-pressure gas pipeline which the HSE states “No Build” and the Proposer’s plan not to move results in proposed PS37 site being unviable and undeliverable.

WAG is of the opinion that many of these constraints and issues were not identified and assessed adequately during the SA and throughout the rest of the local plan process.

WAG is happy to assist in formulating the update to the SA, if required, prior to formal issue of the final document. The evidence if assessed robustly will demonstrate that proposed site PS37 is unsustainable, not viable or deliverable.

SA Conclusions

- 1.77 WAG supports a hybrid approach to the spatial strategy is probably the optimum sustainable option which could achieve the target housing numbers if the Government implements the requirement to increase the minimum housing requirement. However, we understand the methodology will be changed as a result of the recent whitepaper consultation.

Note – The current plan is focused on excessive development in the south of the Stroud district. A local plan that is reliant on the current proposed draft local plan will lead to over-supply, land banking for many years and a failure to achieve the target housing delivery rate and the Local Plan.

- 1.79 AGPs situated on the major link roads in close proximity to urban settlements of Stroud / Stonehouse and Gloucester are more self-contained than those further afield (such as proposed site PS37) and are more easily accessible to employment via transport routes as well as the engine room of Stroud. More distant AGPs provide weaker access to jobs leading to increased commuter road miles.
- 1.81 From the evidence presented there are clear sustainability benefits if AGPs at Moreton Valence/Hardwicke and Whitminster are included in the local plan.
- 1.82 WAG supports larger scale AGP development at C1 (A38) in the North of the District and/or C2 (A419) as the evidence demonstrates these are more sustainable than an AGP at C3 (A4135). Spreading the load across the District and closer to employment.

Additional WAG Conclusions

The addition of new AGPs provides SDC with greater flexibility to select the most suitable, sustainable, deliverable, and viable sites based around an unbiased SA assessment, to achieve the target housing numbers. Both new proposed AGP sites are supported by experienced developers with a proven track record.

Specifically, regarding the important CN2030 initiative, proposed site PS37 is less sustainable than the additional two AGPs recently submitted and assessed.

Overall, proposed site PS37 was found to be significantly less sustainable, when all the SA factors were applied equally to the full range of proposed AGPs. These SA factors making PS37 less sustainable are as follows:

- Increased commuting journey miles
- Landscape impact
- High quality agricultural land
- Infrastructure constraints (inc. M5, A4135, A38, rail network, gas pipeline)
- Coalescence in the Slimbridge Parish and with Cam and Dursley
- Archaeological sensitivity
- Acoustics
- Air quality
- Flood risk
- Water quality

These factors are additional to SDC's own analysis which concluded AGPs situated on the major link roads in close proximity to larger settlements of Stroud/Stonehouse and Gloucester are more self-contained than those further afield (PS37). More distant AGPs provide weaker access to jobs leading to increased commuter road miles. There are clear benefits from providing AGPs at Moreton Valence/Hardwicke and Whitminster. WAG agrees that a large scale AGP development at C1 (A38) and/or C2 (A419) are more sustainable than an AGP at C3 (A4135).

Submitted by Wisloe Action Group on 16/12/2020

The Wisloe Action Group was formed to help represent our community's views in response to Stroud District Council's Draft Local Plan public consultation process. Local people are deeply concerned about Stroud District Council's proposals in their draft Local Plan for a so called 'growth point' in the Slimbridge Parish. Stroud District Council and the developers jointly refer to the site as Wisloe Green, a new "Garden Village", which joins Cambridge, Gossington and Slimbridge together with Cam and Dursley. A significant proportion of the community have been actively engaged throughout the consultation process and will continue to support WAG to work towards the delivery of a sound Local Plan with proposed site PS37 removed.



@Wisloe



@wisloeaaction

wisloeaaction@gmail.com



Appendix ,



STROUD DISTRICT COUNCIL

Council Offices • Ebley Mill • Ebley Wharf • Stroud • GL5 4UB

Telephone 01453 766321

www.stroud.gov.uk

Email: democratic.services@stroud.gov.uk

ENVIRONMENT COMMITTEE

MEMBER REPORT

NAME OF ORGANISATION/BODY	Planning Review Panel
DATE OF LAST MEETING ATTENDED	30 March 2021
BRIEF REPORT:	
<p>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 New local Plan. It is, therefore, unfortunate that it has not been possible to achieve unanimous support from the members of the panel.</p> <p>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. There was discussion in depth on other sites but these were eventually included in the proposals.</p> <p>The duty to co-operate with other authorities, which many find contentious, has been met with the reservation of the site at Whaddon for helping to meet the needs of Gloucester.</p> <p>It would be fair to say that it is expected that differing views on particular sites will emerge. Nevertheless the proposals already set out and the possibility of having a reserve site available, in the event of a change being needed, places this Council in a strong position to face an Examination in Public. No doubt, members of the Environment Committee, will have their own views.</p> <p>I wish to convey my thanks to all members of P.R.P. past and present and all the officers involved, both past and present for their work on the new Local Plan. The Panel has worked well over the years and it is my hope that it will continue to do so.</p>	
REPORT SUBMITTED BY	Cllr Nigel Studdert-Kennedy
DATE	05 April 2021



Appendix -



Homes
England

Date: 4 September 2020

Our Ref: RFI3052

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

Making homes happen

██████████
By Email Only

Windsor House
Homes England – 6th Floor
50 Victoria Street
London
SW1H 0TL

Dear ██████████

RE: Request for Information – RFI3052

Thank you for your request for information which was processed in accordance with the Freedom of Information Act 2000 (FOIA).

For clarification, you requested the following information:

Any correspondence concerning the proposal for a Garden Village / Community / Settlement in the Slimbridge Parish. The proposed site is referred to as Wisloe Green or PS37 in the Stroud District Council draft local plan.

Any reports/correspondence which contain(s) information about the government's decision on whether the above proposal should receive assistance under the Garden Communities programme.

Any assessments/evaluations which show whether the above proposal meets the criteria for assistance under the Garden Communities programme.

This relates to the following time period:

The last two years (January 2018 - current date 2020)

Response

We can confirm that we do hold information that falls within the scope of your request. Please find enclosed to this response Annex A which contains the information held. Please note that we rely on Section 40(2) and Section 43(2) of the FOIA to withhold some information from disclosure.

Please see the link below which will direct you to the FOIA legislation:

<https://www.legislation.gov.uk/ukpga/2000/36/contents>

Section 40 – Personal Information

We have redacted and are withholding information on the grounds that it constitutes third party personal data and therefore engages section 40(2) of the FOIA.

OFFICIAL



Date: 4 September 2020

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Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

To disclose personal data, such as names, contact details, addresses and email addresses could lead to the identification of third parties and would breach one or more of the data protection principles.

Once it is established that the information is personal data of a third party and release would breach one or more of the data protection principles, then the exemption is engaged.

Section 43 - Commercial interests

Under section 43(2) Homes England is not obliged to disclose information that would, or would be likely to, prejudice the commercial interests of any party. We are withholding some information and have also redacted information within Annex A in accordance with this exemption.

Information held surrounding costings and information provided as advice to ministers from the Ministry of Housing, Communities and Local Government (MHCLG) engages section 43(2) of the FOIA as it is commercial in nature and its release would be likely to prejudice the commercial interests of Homes England and other interested parties to the information.

Section 43 is a qualified exemption. This means that once we have decided that the exemption is engaged, Homes England must carry out a public interest test to assess whether it is in the wider public interest for the information to be disclosed.

Arguments in favour of disclosure:

- Homes England acknowledges there is a general public interest in promoting accountability, transparency, public understanding and involvement in how Homes England undertakes its work and how it spends public money.

Arguments in favour of withholding:

- Releasing the information would reveal competitive financial information of a third party which may in turn affect their commercial interests;
- Releasing information in relation to one party in a competitive market would be likely to distort competition, making it a less competitive process, which would not be in the public interest;
- Releasing the information would be likely to negatively impact any future competitive bidding processes as interested parties may feel unable to provide all the information requested for fear of disclosure, which would impact the ability of Government officials and ministers to make effective, informed decisions;
- Release of the information could lead to lobbying that could impact the impartiality a decision maker (or give rise to concerns on the part of others that impartiality could be adversely affected). It is essential that decision makers must make decisions based on the information provided via the bidding process and also be seen to do so;
- Disclosure would result in local authorities being deterred from including commercially sensitive information in those bids. This will mean that Homes England must evaluate bids that are less comprehensive than would otherwise have been the case, meaning that Homes England's ability to undertake due diligence on the bids will be impaired. This will result in decision makers not taking all relevant information into account, meaning the decisions will be less robust and less likely to deliver value for money; and



Date: 4 September 2020

Our Ref: RFI3052

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

- Homes England has been unable to identify a wider public interest in disclosing the information requested.

Having considered the arguments for and against disclosure of the information, we have concluded that at this time, the balance of the public interest favours non-disclosure.

We have a duty to provide advice and assistance in accordance with Section 16 of the FOIA to fulfil this duty we can advise you that from a new prospectus for Garden Communities in 2018, a bid for Wisloe Green was submitted as a potential project for the MHCLG Garden Communities Programme in November 2018. The bid was submitted to MHCLG in the response for bids and a copy transferred to us. Wisloe Green was an unsuccessful bid and MHCLG notified the Council. Most of the information that we hold was provided to us by MHCLG, therefore you might wish to submit your request to them as they may hold further information.

Please see below contact information for the Knowledge & Information Access Team at MHCLG.

By post:

Knowledge & Information Access Team
Ministry of Housing, Communities and Local Government
2nd floor NW, Fry Building
2 Marsham Street
London
SW1P 4DF
United Kingdom

Or via email:

mhclgcorrespondence@communities.gov.uk

Right to Appeal

If you are not happy with the information that has been provided or the way in which your request has been handled you may request an internal review by writing to;

The Information Governance Team
Homes England – 6th Floor
Windsor House
50 Victoria Street
London
SW1H 0TL

Or by email to infogov@homesengland.gov.uk

You may also complain to the Information Commissioner however, the Information Commissioner does usually expect the internal review procedure to be exhausted in the first instance.

The Information Commissioner's details can be found via the following link



Homes
England

Date: 4 September 2020

Our Ref: RFI3052

Tel: 0300 1234 500

Email: infogov@homesengland.gov.uk

Making homes happen

<https://ico.org.uk/>

Please note that the contents of your request and this response are also subject to the Freedom of Information Act 2000. Homes England may be required to disclose your request and our response accordingly.

Yours sincerely,

The Information Governance Team

For Homes England

OFFICIAL

WISLOE GREEN

A PROPOSAL FOR A NEW GARDEN COMMUNITY IN THE DISTRICT OF STROUD



NOVEMBER 2018

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WISLOE GREEN

Wisloe Green presents a significant opportunity to form a new, self contained settlement. The principles of place making and the creation of vibrant communities are central to the government definition of a Garden Community.

The vision for Wisloe Green embraces Garden Community principles at the early concept stage through the creation of a strong sense of landscape identity and integration.

In keeping with many of the early C20th Garden towns and villages, Wisloe Green grapples with the contrast between the man-made and the natural and it is in the bridging of this apparent divide that the development finds its identity.

From inception, this sense of identity is critical to developing the structure of the settlement and laying the foundations for any emerging plans in the future.

Planning and delivering Wisloe Green is already underway. The prospect of this new settlement is being progressed by Stroud District Council through the Local Plan. The will and aspiration of both landowners (The Ernest Cook Trust (ECT) and Gloucestershire County Council (GCC)) are aligned and the parties have collaborated to promote the site and design thus far. Furthermore Wisloe Green has the potential to be considered as a location for much greater growth as a new Garden Community for Stroud.



PARTNERING TO DELIVER

Gloucestershire County Council and The Ernest Cook Trust own the land which together comprises the area for a new settlement: Wisloe Green. This presents a significant opportunity to undertake a comprehensive approach to development with the joint owners working in partnership to develop a vision from this early inception stage, through to delivery and ongoing into management and stewardship.

THE ERNEST COOK TRUST

The Ernest Cook Trust was established in order to encourage learning from the land and it continues to actively pursue this endeavour in a variety of ways today.

The vision for a new settlement provides a unique opportunity to embody this endeavour in a new way, reinterpreting what it means to provide the opportunity to learn from the land in a very direct way by designing a place around its landscape. A fertile seed bed in which families grow and community values thrive: Living & Learning in the Landscape.

GLOUCESTERSHIRE COUNTY COUNCIL

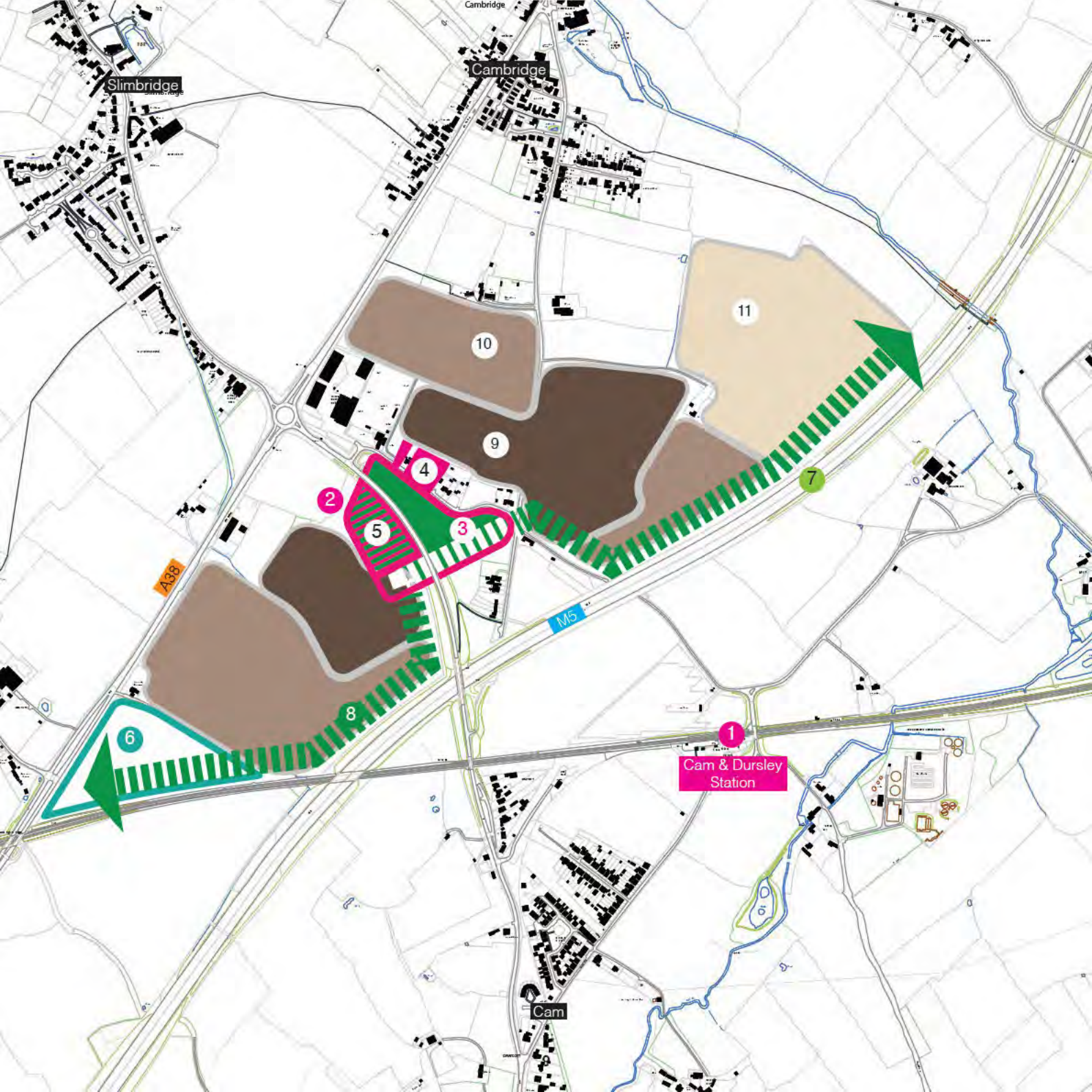
Gloucestershire County Council has an important role in helping to support sustainable growth in the county. This means taking a proactive approach, planning ahead for the future to improve the quality of life for Gloucestershire people and communities.

The vision for a new settlement allows Gloucestershire County Council to facilitate sustainable and high quality development through a partnership approach and provide a positive legacy for Gloucestershire.

EXISTING FRAMEWORK

- 1 Quick and convenient access to Bristol and Birmingham from nearby Cam & Dursley rail station
- 2 Centre the new settlement around a hub of community activity set within a Central Park
- 3 Create a prominent, sculptural landscape feature at the centre of the settlement
- 4 Community facilities create a Local Centre in a location which is within easy reach of the whole settlement and overlook the Central Park
- 5 A new School is located centrally and within a rich landscape setting
- 6 Employment space located adjacent to the A38 for easy access but also creating a gateway to the settlement from the south
- 7 A landscape and acoustic buffer shields the settlement from the motorway and makes the most of the opportunity to enhance ecological continuity and biodiversity
- 8 A green corridor running parallel to the motorway corridor
- 9 Nearer the centre, development comprises a mix of small and medium sized terraced and semi-detached homes
- 10 Away from the centre and the central park, and where the settlement edge is formed by road or rail boundaries, development reduces in density with the provision of more private green space
- 11 Where the settlement edge meets the landscape and links to the Cam river corridor, development is the least dense

The existing framework currently under consideration within the Stroud Local Plan process comprises 1500 homes, a primary school and 5hectares of employment space and is accommodated entirely on ECT and GCC land and delivery remains within the control of the collaborating parties.



Slimbridge

Cambridge

A38

M5

Cam & Dursley Station

Cam

6

2

5

4

3

10

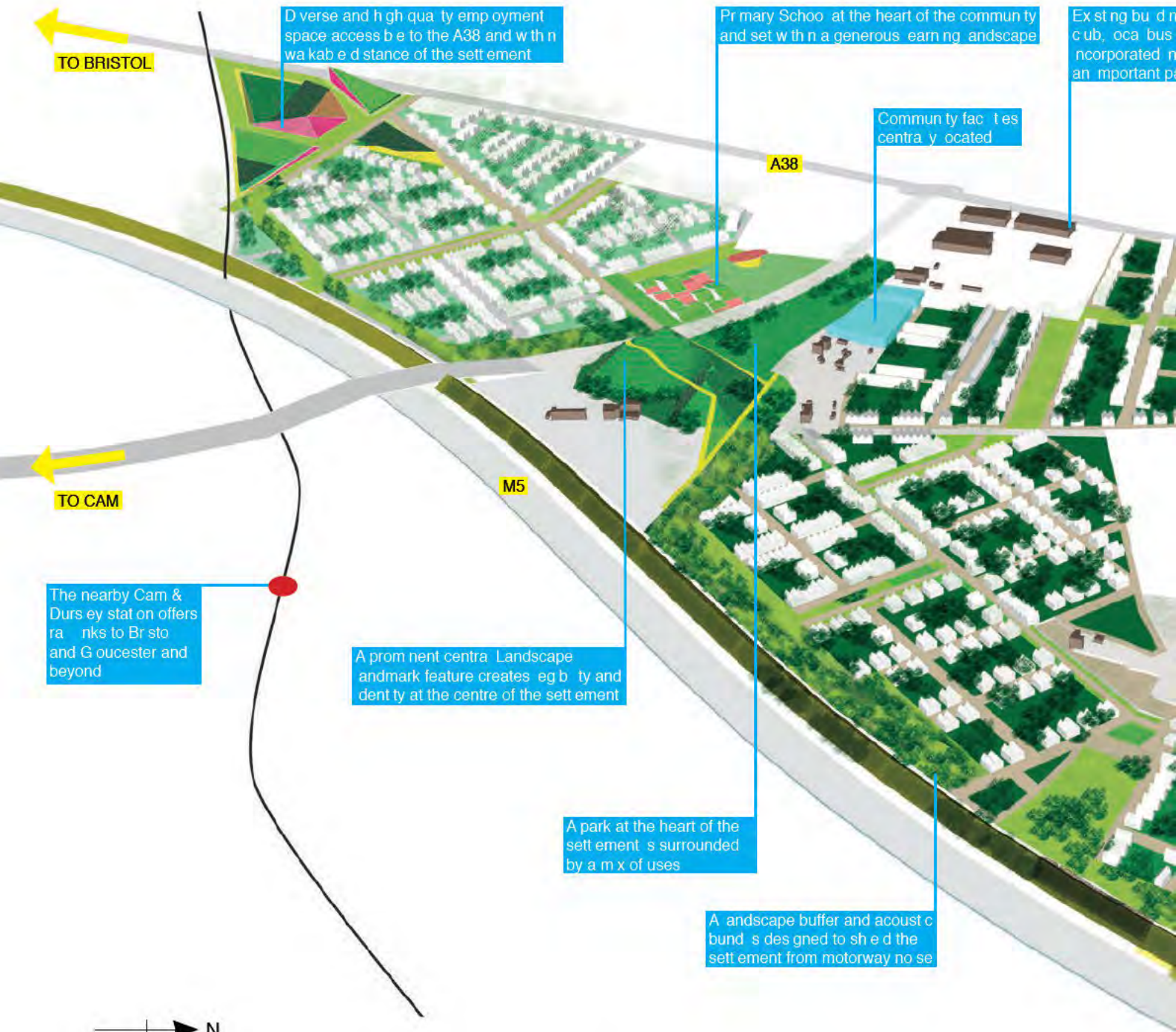
9

11

7

8

1



TO BRISTOL

Diverse and high quality employment space accessible to the A38 and within walking distance of the settlement

Primary School at the heart of the community and set within a generous green landscape

Existing buildings, including a bus stop, incorporated into an important part of the development

Community facilities centrally located

A38

TO CAM

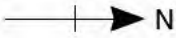
M5

The nearby Cam & Dursley station offers rail links to Bristol and Gloucester and beyond

A prominent central landscape landmark feature creates a sense of identity and continuity at the centre of the settlement

A park at the heart of the settlement surrounded by a mix of uses

A landscape buffer and acoustic bunds designed to shield the settlement from motorway noise



ings and uses (eg. the footba
nesses and hous ng) are
to the des gn and become
art of a new communit y

Green streets and spaces create an
attract ve and susta nab e network



PLACEMAKING

Wisloe Green looks to create a mix of uses which support a diverse community and sustainable living.

The new settlement will be distinct and separate from surrounding communities but nevertheless will include facilities and benefits accessible to neighbouring communities: employment, green space and community facilities.

The new settlement will be founded around a series of garden neighbourhoods whose architecture and density vary creating a variety of house types and neighbourhood characters.

Overall the new settlement will look to sit subtly in the surrounding landscape enhancing the character and making the most of open views across the low lying surrounding countryside.

Where previously the areas landscape character and quality has been lacking, Wisloe Green will introduce distinctive and rich landscape character to the heart of community living.





THE OPPORTUNITY

REALISING WISLOE GREEN GARDEN COMMUNITY

ECG and GGC with Stroud District Council have an existing, emerging strategy for the delivery of 1500 homes at Wisloe Green.

An augmented settlement of up to 5000 homes, provides the basis of this Garden Communities bid and provides the opportunity to integrate living and learning in the landscape with 2 new primary schools, a secondary school, 18hrs of employment, vitality and critical mass around multi-hatchoning landscape.

These expanded components, facilitated by a larger settlement enable the realisation of a long term community lifecycle, which integrates education, training, employment to nurture home-grown local skills and professions and the ability within the community to care and take responsibility for its own!



A Network of public green spaces and public realm linking a key community and public infrastructure to engage and integrate activities and functions with the landscape.



Create a pedestrian and cycle link overlooking the A15 to the nearby Cam & Oarsby station.



Upgrade existing footway on A155 to shared use route by way and provision of a foot/cycle bridge adjacent to existing as bridge. Use existing pedestrian connection between A155 and Cam & Oarsby station.



Centre the new settlement around a hub of community activity centred with a Central Park.



Primary and Secondary School provision, centred within the landscape and integrated with the community and other uses via the network of public green space and other public realm.



Employment space, located adjacent to the A15 for easy access but also creating a gateway to the settlement from the south via the public green space network.



Formal park spaces mark landmark positions in the public green space network being landscape sculpture and landscape landmarks to be a visible reference points throughout the new settlement.



A central corridor through the settlement provides access and an attractive, functional and safe outdoor space throughout the settlement, set away from the motorway and the A15 this central corridor can become a protected community space with a 400m walk of every part of the settlement, overlooked by buildings to also provide a variety of activities and a cycle and legible route through the settlement, connecting the parks, the employment space and the station.



Other minor green corridors and streets create a green grid connecting existing hedgerows and providing a better integrated ecological framework in the landscape.



A wide range of residential buildings fills the settlement from the motorway and makes the most of the opportunity to enhance ecological connectivity and biodiversity.



Park Development
Nearer the centre with respect to access to high quality public open spaces, development comprises a mix of attached and semi-detached houses, flats and non-detached homes.



Cluster Development
Away from the centre and the central park, and where the settlement edge is marked by road or rail boundaries, development reduces in density with the provision of more private green space (not all connected by a network of green links).



Countryside Development
Where the settlement edge meets the landscape and links to the Cam river corridor, development in the east density, the integration of private green spaces with the river corridor and the landscape (trees and green) meets the ecological network and establish a rich, a rural purpose landscape.



Room to expand
Opportunities to realise the full potential of the Garden Community exist on additional land, and with ECG & GGC ownership and through negotiation with 3rd party and owners.



LEARN A NEW WAY TO LIVE

Wisloe Green Garden Community will be a place which goes on growing. But the growth in this community will transcend beyond just an increasing number of houses into a growing depth of belonging, knowledge and inter-generational responsibility.

The long term and sustainable growth and health of this community will come about not through the imposition of patterns of living or regulation. It will be born and nurtured through the profound integration of living, learning and landscape.

Schools often operate in isolation from other community facilities and resources and without the relationship, richness, sharing and collaboration that is modelled in many other areas of life.

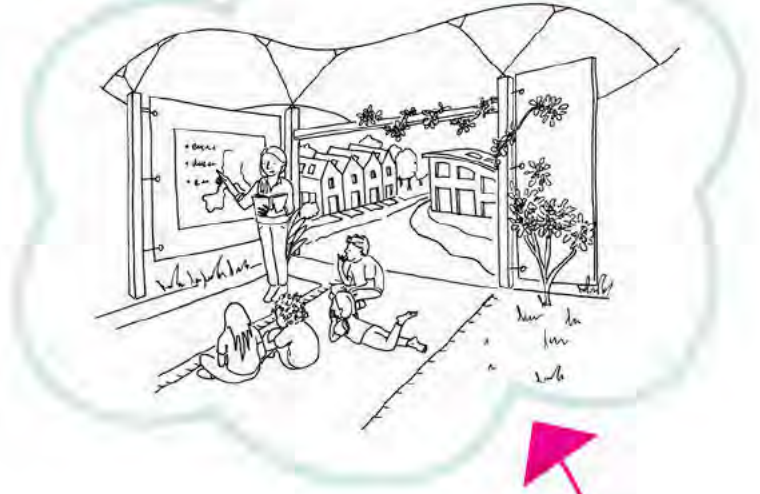
Learning and living should go hand in hand. Schools are a seed and a foundation but life and the landscape in which it takes place is the classroom.

Wisloe Garden Community is a unique opportunity to integrate learning into life and the landscape through partnership and placemaking.

A future community of this scale requires a mind shift. Shifting minds is at the heart of where all learning and enlightenment begins.

In creating a sustainable community there is a lot of focus on balancing employment and houses, and then providing local services, reducing car and energy use and building community around jobs and homes. A new settlement at Wisloe Green will do all of this. But the missing link is nurturing new generations within the body of the community, within the landscape of the place: education, training, employment and homes; creating a place in which the community can grow their own: The Garden and the Community.

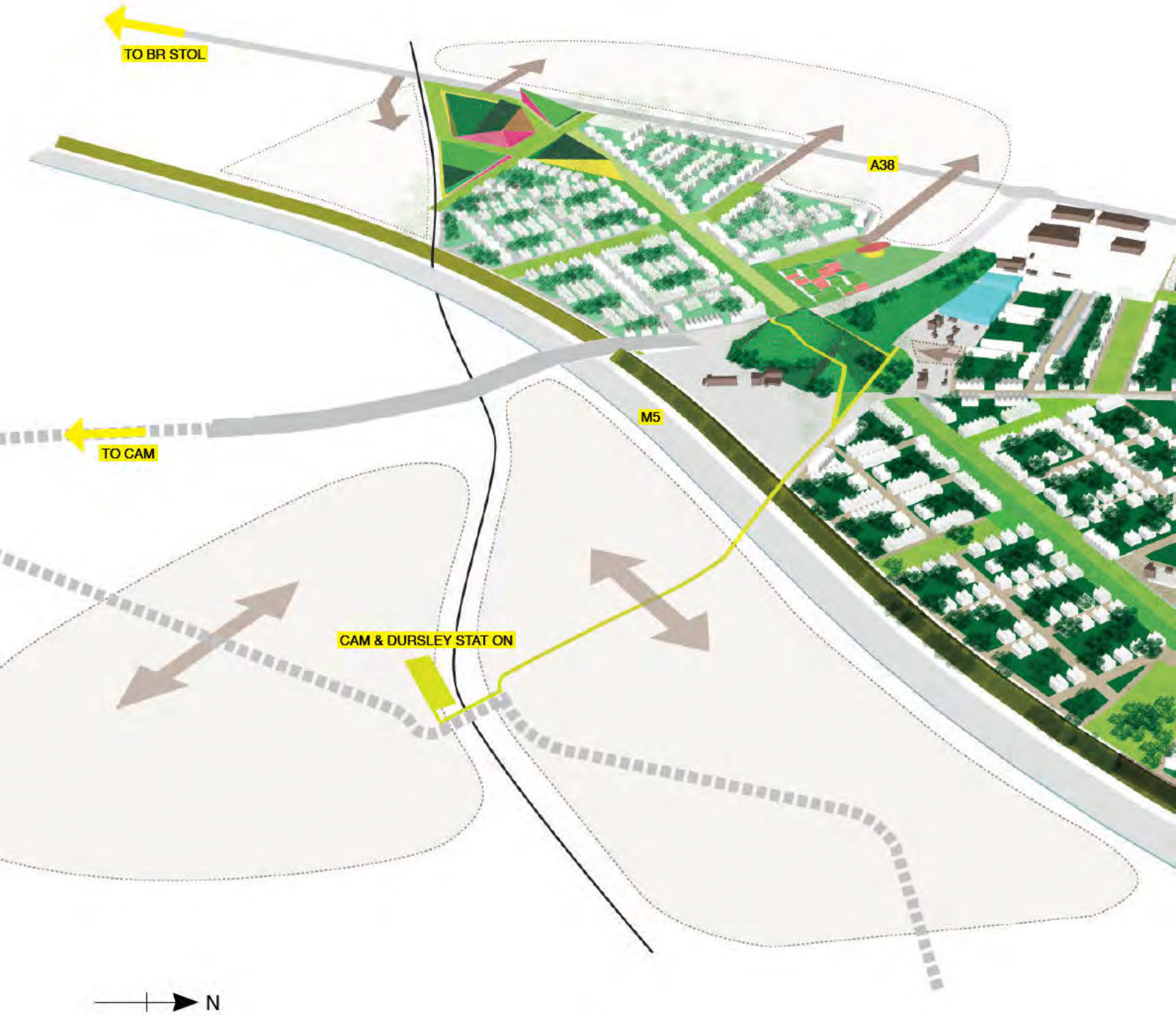
Learning



Living



Landscape



ROOM TO EXPAND



The emerging strategy for a settlement of 1500 homes is deliverable on ECT & GCC owned land alone.

The opportunity of exploring a Garden Community of up to 5000 homes would need increased capacity. The settlement could expand initially onto additional land in ECT and GCC ownership adjoining the existing proposed area. ECT, GCC and Stroud District Council would also look to engage with 3rd party land owners for longer term phases of the Garden Community delivery.

The structure of the settlement from its outset would adapt to allow for this increased growth (from 1500-5000 homes).

Initial masterplanning would need to facilitate connections and expansion potential identified takes account at high level of flood risk constraints and seeks to respect the integrity of the nearby settlements of Gossington, Slimbridge, Cambridge and Cam by avoiding inadvertent coalescence with these villages.

The life of the community:

When the pre-school opens next year I'm going there. My family are moving in the spring to a house on the other side of the park.



I start reception in September. Mum & Dad are really pleased with the school's outdoor space and the new school building which is right next to the park. It has outdoor classrooms and trees in the dining hall! We did a nature walk on the roof of the school the other day.



After I've walked to school I can get to the drop in centre for the toddler group. If the weather's good we meet in the park. There are quite a few parents there now. At the moment everyone's excited about the next phase and we're looking forward to new people moving in up the street.



We just managed to buy our first house. I thought we'd miss not having a garden but we have a sunny terrace and most of our friends live on the park so we just have get togethers out the front.



We have 4 new projects starting soon. I'm thinking of taking on another member of staff. This flexible office space has been perfect for us as we have grown but it has been low risk, thanks to the subsidy from the community fund!



On Saturday all us friends meet in the park, sometimes we go back to someone's house but there's more to do in the park so we just explore and see who else is playing out.

Planning for a new community

Pioneering a new community

Building a new community

Building a new community

2019

2025

2026

2030

400 homes
2.5ha Employment
Primary School
Nursery

160 dwellings per year to end of plan period
Construction apprenticeships
Start up work space
Central Park and Landscape Sculpture completed

1400 homes
5 ha Employment
Community Fund established
Sponsored workhub with mixed facilities
Mixed community centre



Total 900 homes



Total 1500 homes

Scope of Existing Local Plan

2031
Scope of Local Plan Review

I feel so fortunate to live in Wisloe where I grew up. My house is at one end of the park and my office is at the other end so I run to work. I'm interested in teaching though and I'm just waiting to hear about the new Learning & Landscape teacher training which has been started up by the University of Gloucestershire. The Ernest Cook Trust have said they might be able to help with some voluntary work or a grant for my fees.



I live on the ground floor of a large house on the park. Its specially designed for my wheel chair. Fortunately there are lots of people locally who call in and the community care group can provide more assistance if I need it. They're just in the building on the corner of the main park.



Most of our friends are at Wisloe Secondary School. Its a great school. Next year I start my GCSEs and I'm going to do the new Landscape Architecture GCSE, mainly because we get to do loads of field trips and spend a lot of time outdoors.



I have moved here from just down the road to be able to receive 24/7 assistance but still be near friends and family. The Carers live on site and I have all sorts of facilities in the building as well as fantastic gardens where I get visits from the school children and other people.



We've moved to Wisloe Green having lived away for a few years. Our new home is low maintenance and cheaper rent but the park is right on our doorstep and in the autumn my company are letting me work from the workhub space on the green. Our friends come for the weekend and are thinking they might be able to move back to the area too.

15 years ago I trained in Wisloe on the 'Build a Garden Community' scheme and after an on site apprenticeship I'm now building the next phase of Wisloe homes. My wife and I are hoping one of them might be ours soon!



We never imagined being able to give up the car but now living next to the family is fantastic. If we need a car occasionally there are several for booking in the car pool. Most things are within easy reach by walking or cycling though.



Growing the community

Sustaining the community

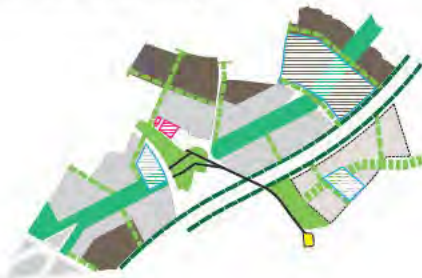
2035

2050

- 2200 homes
- 2nd Primary School
- Mixed community centre
- Pedestrian link over M5 to station
- Further park spaces opened
- Green link projects with schools and community

- 1 Secondary School
- Green space utilised to link schools with employers
- Co-work training initiatives for school leavers

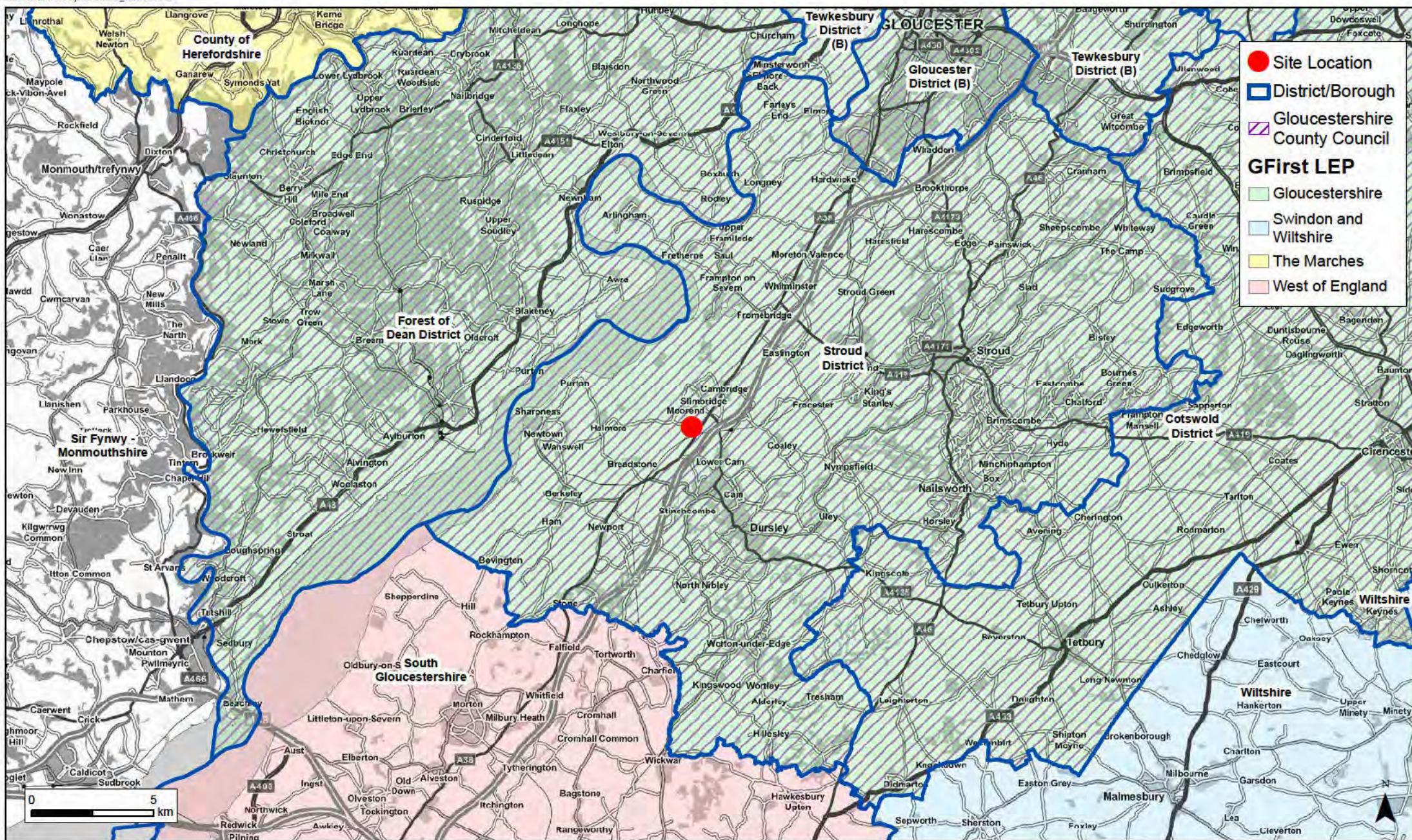
- 5000 homes
- 16ha Employment
- Additional shared work space
- Parks long term maintenance strategy in place
- Ecological performance measures underway



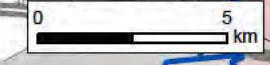
Total 3500 homes

Total 5000homes

2040



- Site Location
- District/Borough
- Gloucestershire County Council
- GFirst LEP**
- Gloucestershire
- Swindon and Wiltshire
- The Marches
- West of England

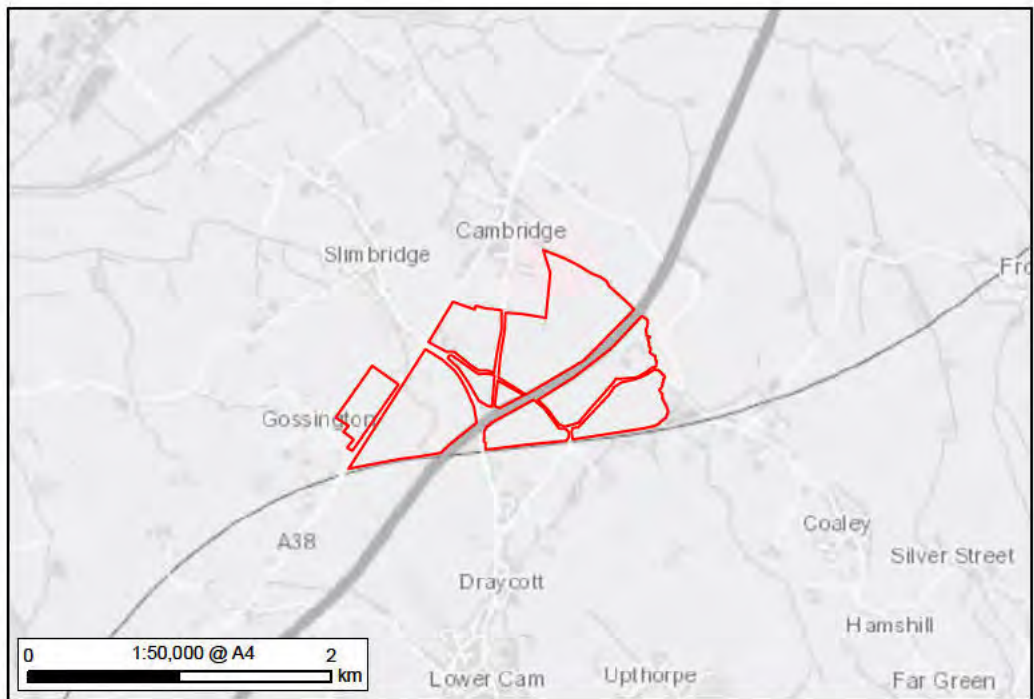


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Client	1:200,000 @ A4
	06/11/2018
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Wisloe Development
 Wisloe Green Garden Village



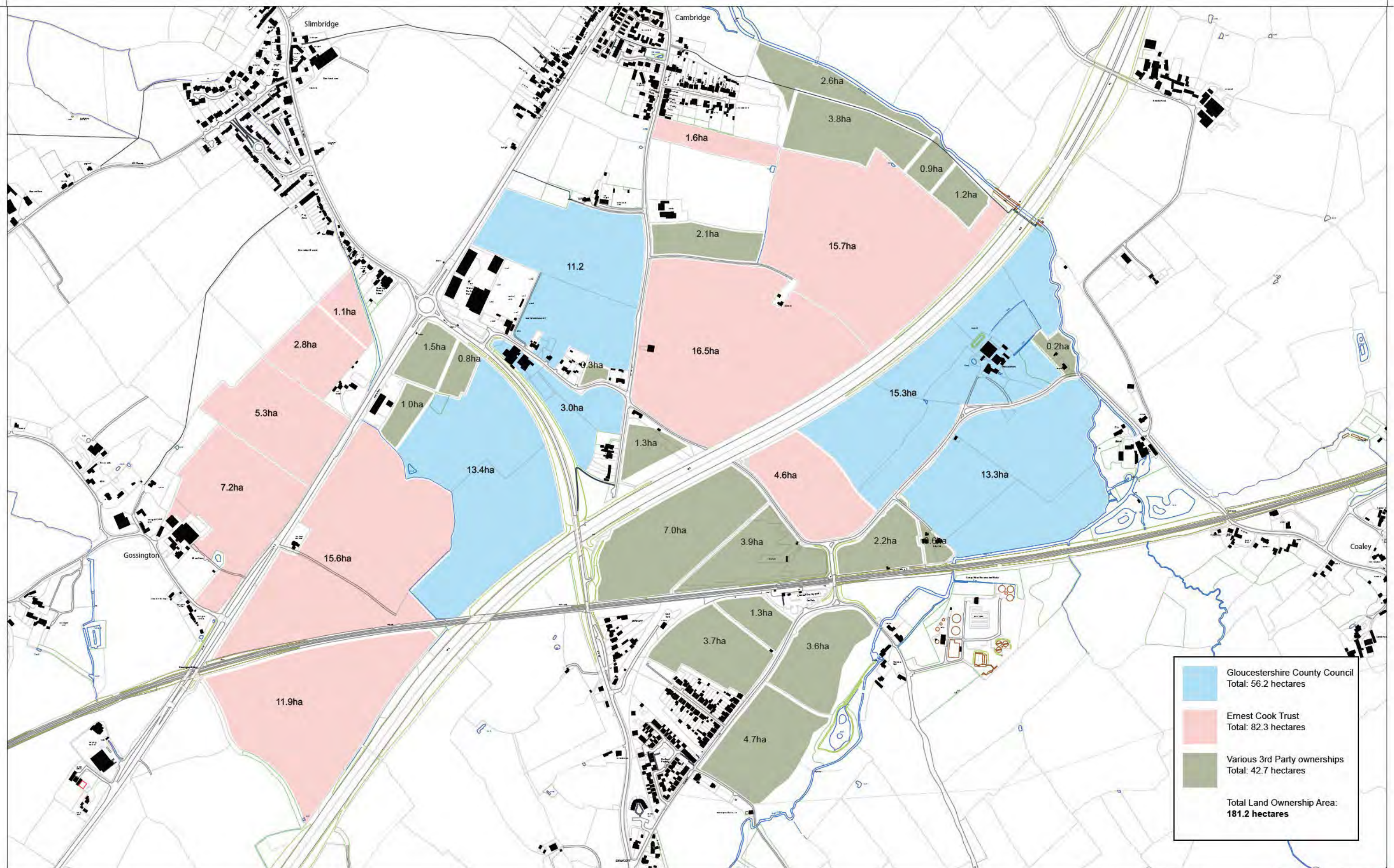
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07/11/2018
 Drawn: S
 Checked: S

Wisloe Green Garden Village
 Site Location Plan

Figure 1 Rev B

N



	Gloucestershire County Council Total: 56.2 hectares
	Ernest Cook Trust Total: 82.3 hectares
	Various 3rd Party ownerships Total: 42.7 hectares
Total Land Ownership Area: 181.2 hectares	

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Scale: Not to Scale



DRAWN BY: 	CLIENT: Ernest Cook Trust & Gloucestershire County Council	 PLACE MAKING REGENERATION URBAN DESIGN 6 Bakers Cottages Longmeadow Road Lympstone EX8 5LP t: 01395 227052 e: info@dhud.co.uk www.dhud.co.uk
DATE: 07/11/18	PROJECT: Widoe Green New Settlement	
SCALE: NTS	DRAWING TITLE: Land Ownership Plan	
REVISION:	DRAWING NUMBER:	
181107	WGC_GCB_001	

DAVID DREW MP

Stroud



HOUSE OF COMMONS

LONDON SW1A 0AA

s. 40(2)

Stroud District Council
Ebley Mill, Ebley Wharf
Stroud GL5 4UB

9 November 2018

Dear s.
40(2)

Following our meeting to discuss the Garden Communities Programme I am writing to express my support in principle for Stroud District Council to explore the potential for Wisloe Green Garden Village to deliver a high-quality new community to meet future housing needs within the District.

Building the homes and delivering the jobs that we will need into the future requires public bodies to be ambitious about future plans for housing and growth, whilst ensuring that the infrastructure to support that growth is properly planned for and delivered. I support Stroud District Council's ambitions to meet the future housing needs of its residents by developing sustainable places to live and work with high quality affordable housing and good access to community facilities and public transport.

Whilst recognising that these proposals are at an early stage and have yet to be fully tested through public consultation and the Local Plan process, it is important that opportunities for creating new garden communities through public-private partnerships are fully explored. The concept of garden communities is about environmental quality and community legacy and, provided that mechanisms are put in place to ensure these aspirations are actually delivered, they should be supported.

I look forward to learning more about these proposals as they are worked up and finding out more about how they can contribute to delivering new homes and jobs for local people.

Yours sincerely,

s. 40(2)

David Drew MP
MP for Stroud Constituency

Wisloe Green: Structure Chart / Organogram

ERNEST COOK TRUST GLOUCESTERSHIRE COUNTY COUNCIL

LEGAL & ARTICLES OF ASSOCIATION

WISLOE GREEN DEVELOPMENT CORPORATION

GOVERNANCE	PLANNING	STAKEHOLDER & STAT CONSULTEES		FINANCE	COMMUNITY	DELIVERY TEAM	LEGAL
Ministry of Housing, Communities and Local Government	Master Planner	Stroud District LPA	Gloucestershire County Council LPA	Development Vehicle Finance	Wisloe Green Foundation Environment Culture Leisure Health and Wellbeing Learning Charity	Developers Resi / Leisure / Commercial	Legal
Local MP	Architect	EA	g First LEP	Central Government		Registered Providers (RPs)	Auditors
Adjacent LPAs	Planning Consultant	Cotswold AONB Board	Highways England	LEP		Self Build Association	
	Technical and Environmental Lead	Network Rail	Severn Trent Water	Local Government	Residents Association and Key Stakeholders	Management Companies	
	Sustainability Consultant	Natural England	Historic England	Developer Finance		Infrastructure Providers	
	Land Agent	Education Authority / Academy	Sport England	Third Party Heritage Lottery Fund Community etc.		Stakeholders and Stat Consultees	
	Affordable Education Leisure Specialists	CBI Confederation of British Industry	National Grid	Statutory Consultees		Governance Local and National	
	Legal Agreement						

Land At Wisloe

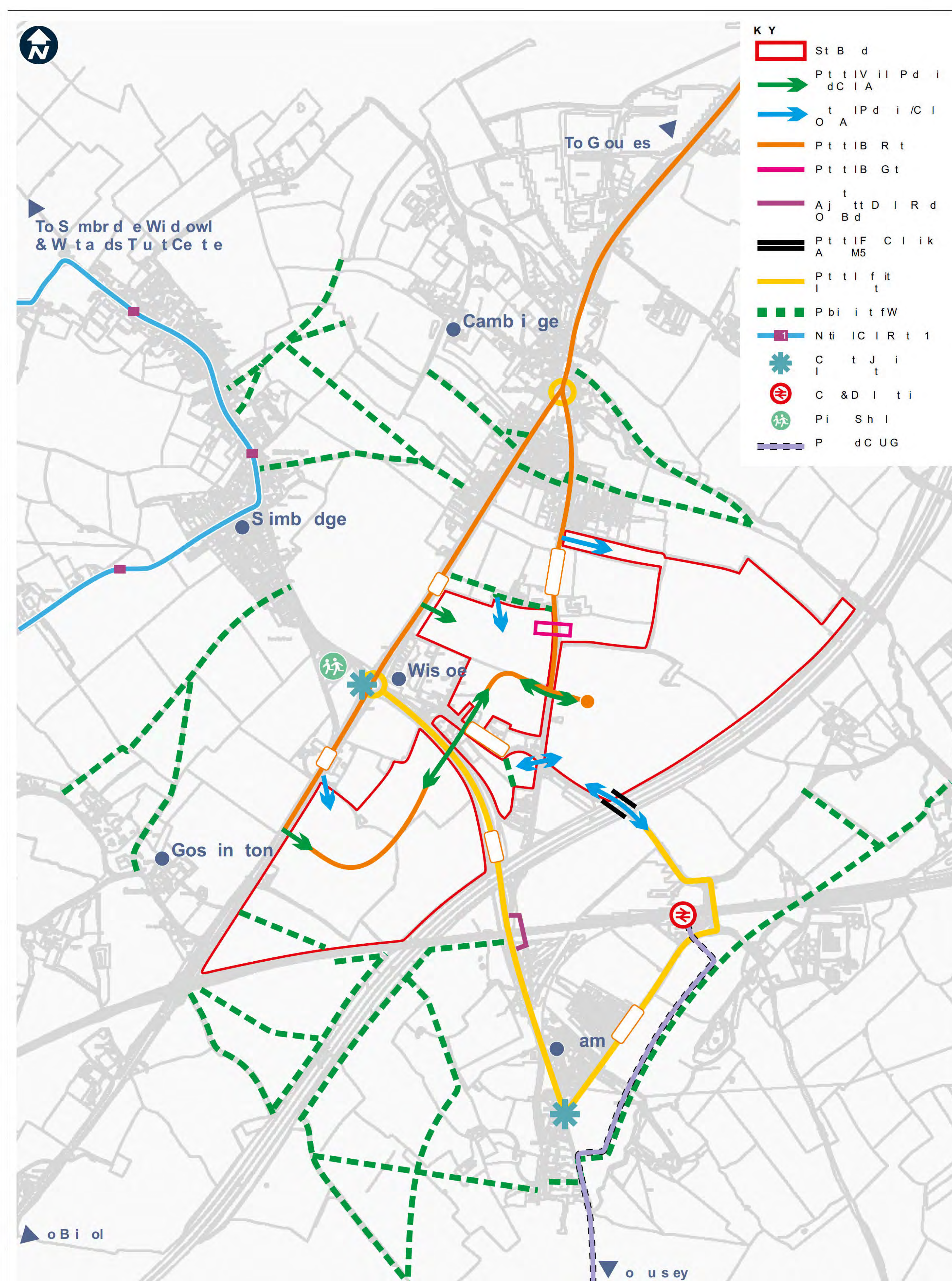
A Proposed New Settlement

Gloucestershire County Council and the Ernest Cook Trust

Gloucestershire County Council and the Ernest Cook Trust are land owners of the site at Wisloe which has been identified through Stroud Local Plan as a potential new mixed use settlement

The Ernest Cook Trust is one of the UK's leading outdoor learning charities and was established in 1952 to encourage learning from the land which it continues to do today

Gloucestershire County Council has an important role in helping to support sustainable growth in the County. This means taking a proactive approach and planning ahead for the future to improve the quality of life for all Gloucestershire people and communities



A new settlement at Wisloe would provide an opportunity to facilitate a sustainable and high quality development through a partnership approach and provide a positive legacy for Gloucestershire

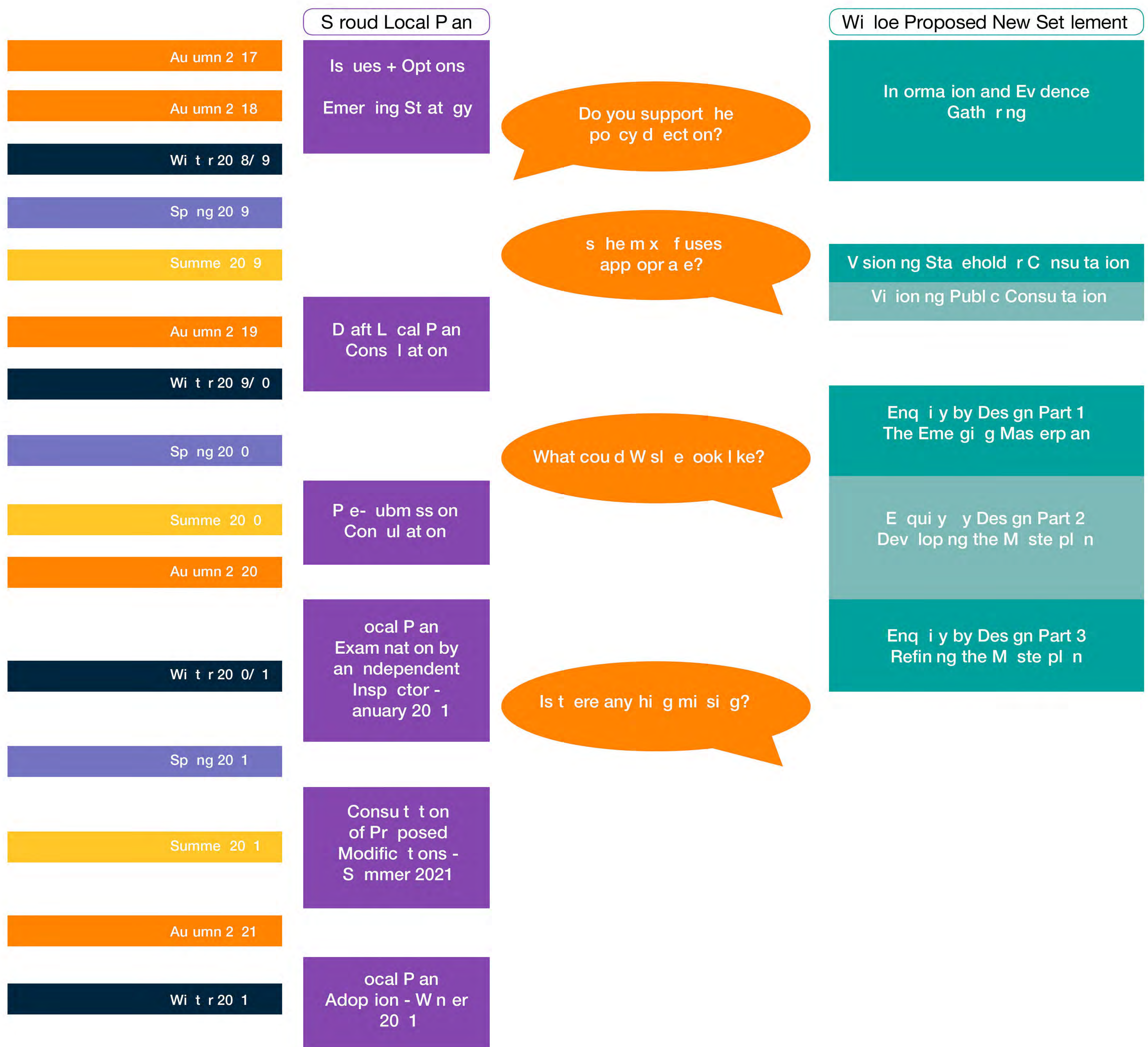
The Wisloe masterplan is developing through ongoing engagement supported by detailed technical land assessment studies that were commissioned earlier this year. Our ongoing programme of engagement means that we are not able to present a complete masterplan yet, but we are able to share the outcomes of our two-stage Visioning exercise which highlights the views we received from local people and stakeholders. Our proposed engagement timetable highlights the production of a detailed masterplan ahead of the independent examination of the Local Plan.

Stroud Local Plan

Landowner Consultation

Stroud Local Plan and Wisloe Proposed New Settlement

The diagram below shows the progression of the site through Stroud Local Plan alongside a schedule of stakeholder and public consultation led by the land owners. Throughout this process the land owners welcome constructive conversations with local people and businesses to help shape the proposals.



The Ernest Cook Trust and Gloucestershire County Council support the decision of Stroud District Council to include Wisloe in its emerging Local Plan Review. Both land owners have embraced the opportunity to consult at this early stage and have committed to ongoing engagement and involvement with existing communities around the site including Slimbridge, Cambridge and Cam as well as those living and working locally.