

WISLOE REPORT SUMMARY

Draft Local Plan Consultation - January 2020

The proposal at Wisloe encompasses an area of approximately 78 hectares (193 acres) of land. It is located towards the south of Stroud District being 11.5km from M5 junction 14 and 10km from the border with South Gloucestershire. It has a total linear length of 2.04km of which 1.32km adjoins the A38.

The site is on the 20m contour. It is almost completely flat with virtually no discernible topographical variation. The site is bounded by the M5 motorway to the east and the A38 to the west. The Gloucester to Bristol rail line adjoins the eastern boundary at the southern half of the proposed site with the motorway raised on a significant embankment. The land identified is typical of the Severn Vale area in which the site lies consisting mainly of lowland plain, arable and improved pasture in good condition interspersed with a hedge and ditch structure with occasional mature trees. Wisloe itself consists of less than 20 homes widely dispersed around a small equestrian yard and former farm with a few isolated homes along the old Dursley Road. It is slightly removed from but a fully integral part of the Slimbridge Parish.

The Issues and Options consultation conducted in 2017 did not include the site as a candidate for potential development consideration. It was therefore a shock to the community to see this introduced as a second, erroneous, 'single' site in the Stroud District Council (SDC) Emerging Strategy document. The Ernest Cook Trust, who are promoting the site, carefully avoided any initial public scrutiny by submitting the proposal after the 2017 consultation had closed. Despite advice to the contrary and an attempt to remove this flawed proposal by Cllr Tomblin at the September 2018 Environment Committee, a whipped vote issued by the ruling coalition ensured it's inappropriate progress into the Emerging Strategy. Further work within the ruling coalition appears to have influenced the Green Group from their initial rejection of the Wisloe site into supporting inclusion in the Draft Local Plan. All Conservative District Councillors for The Berkeley Vale Ward and Conservative Councillors on the Planning Review Panel have consistently, continually and unanimously lobbied to have the Wisloe proposals removed from the plan.

Whilst from a commercial perspective the site may be an attractive, profitable and lucrative opportunity for the scheme promoters, it is damaging to a range of local Vale communities, land and landscape. The scheme would have a negative impact on fundamental components of the Draft Local Plan, augment a dangerous and unsustainable imbalance towards the south of the District, introduce environmental harm that cannot be mitigated and put into question the site selection criteria at inspection risking rejection of the entire plan.

Coalescence. Wisloe is a very small, dispersed hamlet within and part of the parish of Slimbridge. It has evolved organically and forms the smallest of four rural settlements within the parish each with its own unique form and character. The existing Local Plan notes that protecting space between settlements has been an historic priority and policy ES7. Paragraph 6.43 notes that 'the principle pressure on the landscape arising from new development is erosion of the separate identity, character and functional amenity of settlements and their setting, and impacts on the open countryside'. The Wisloe proposal would coalesce these distinct communities including Cambridge and Gossington, into a single amorphous town and introduce

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significant harm into the surrounding countryside. It would have an unacceptable urbanising effect and separate identity would be lost against policies and objectives in the Local Plan.

The degree of separation proposed in the outline development document varies but is as low as the width of a road in large part. Policy ES13. Paragraph 6.64 states that 'It is important to protect the loss of open space where this would harm the character of a settlement or the visual quality of the locality'. The proximity and overbearing nature of development proposed would destroy historic and unique physical identity of the individual communities concerned. Any separation exists only in the mind of site promoters. On the ground, experience would be of one, large, unbroken urban estate structure spread incongruously in the midst of low lying, pastoral fields. Any perceived break in travel between communities would be removed and, when combined with the Draft Local Plan proposals for Cam, continual built form of over 7km would exist from the Cotswold edge adjoining Dursley to the Severn Vale. The proposal would create over three times the number of houses in the existing communities of Slimbridge Parish and produce a large, alien, dominating single urban estate within an otherwise exclusively rural and traditional setting. The SDC landscape sensitivity assessment carried out by White Consultants in 2017 surveyed all fields surrounding Slimbridge village to test the degree to which harm would be caused by the introduction of residential and employment development. Wisloe was, perversely, excluded from these tests but the fields in question directly adjoin the proposal site and it is reasonable to directly extrapolate from these findings. Amongst a range of damaging impacts reported, erosion of separation between the individual communities was a common theme and extension of housing along the A38 would be highly visible and damaging. This independent review concluded that in general residential and employment uses were reported as inappropriate and undesirable.

The current proposals for Wisloe are out of character, incongruous intrusions into an almost completely flat, rural landscape. Other communities, including some of those proposed in the Draft Local Plan, are or would be located in rolling countryside that helps disguise and break up built form within folds of landscape. This is not possible at Wisloe which is almost completely flat with virtually no topographical variation.

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Agricultural Land Classification. Quality of land has a significant bearing on where development should take place. Local planning authorities have an obligation to protect Best and Most Versatile (BMV) land and to target brownfield or lower grade land for development. BMV land is designated as Agricultural Land Classification (ALC) 1, 2 and 3a. Land in the Stroud District outside of urban form is almost entirely grade 3b or lower and therefore available for development consideration. The land at Wisloe represents the largest and one of only two significant areas of grade 2 land in the District. The developers have had their own ALC assessment carried out. However, there are a wide range of anomalies and inconsistencies with the assessment and how it was carried out. It has also been confirmed, by the company that carried out the tests, that they did not follow the correct, industry standard, required procedure. They should have drilled sample holes on each of the 78 hectares to a depth of 1200mm. They cannot demonstrate that they covered the entire site as procedure dictates and they have also confirmed that they only drilled to 600mm in the majority of instances. The findings therefore, cannot be used as evidence. The National Planning Policy Framework (NPPF) paragraph 170 states: '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'. NPPF paragraph 171 states 'Plans should distinguish between the hierarchy of international, national and locally designated sites and allocate land with the least environmental or amenity value'. The NPPF also notes that 'areas of poorer quality land should be preferred to those of higher quality'. In a changing world where security of food supply could be crucial and food miles become increasingly important for environmental protection, loss of high-grade land such as that at Wisloe should not be permitted as a range of alternative, sustainable solutions exist. The newly agreed SDC Carbon Neutral 2030 plans and policies also dictate that BMV land will be protected and preserved for future local food consumption. The Sustainability Appraisal that accompanies the Draft Local Plan also highlights the need to protect BMV land (3.62 P 23).

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Series of view of high grade BMV land at Wisloe



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Landscape and AONB. The Cotswolds AONB is immediately to the east and south-east of Wisloe. While the site proposed is not within its boundary, areas that impact upon the AONB must comply with and pass strict tests to gauge harm to this critical local asset. The AONB boundary lies only just over 1 mile away at its nearest point and as a result, planning tests present a significant challenge. Organic historical development in The Severn Vale along the A38 corridor has tended to evolve in an approximately east/west orientation along minor roads adjoining the northeast, southwest A38. This historical linear development sits comfortably within the folds of landscape, does not introduce a significant bulk of built presence on the main road and blends with the gentle, meandering contours of the land offering a largely pleasing, dispersed and visually permeable built form. The proposal at Wisloe however, runs northeast, southwest alongside the A38 and grows to a large, intrusive and out of character amorphous block. It conflicts with the traditional linear pattern of the other rural Slimbridge communities as noted in the 2017 landscape sensitivity assessment. This offers a jarring, incongruous intrusion into a landscape largely devoid of built form and introduces an unbroken urban estate orientated counter to prevailing housing. The impact on views from the AONB are particularly pronounced. The current unbroken vista from the Cotswold escarpment across green fields and hedgerows with accompanying sinuous traditional housing draws the eye westwards towards the River Severn and Forest of Dean beyond. Introduction of block development running across this view would dominate the Vale scenery and scar the rural landscape. The views out of the site and from public roads and rights of ways towards the AONB currently offer outstanding vistas of the Cotswold escarpment which would be obscured if these proposals are progressed. The Cotswold Conservation Board actively seeks to manage development within its own borders, but also on significant adjoining sites. Its statutory duty is to “conserve and enhance”. The practical, amenity and financial importance of the AONB to Stroud District cannot be overstated. Harm of the scale proposed in these damaging proposals should not be permitted as any benefits do not outweigh the overall permanent harm. The proposals certainly do not comply with the requirement to ‘enhance the beauty of landscapes’ as dictated by the Sustainability Appraisal (3.62 P23).

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Series of views from Coaley Peak with River Severn in background – Part of proposed development site runs across centre of picture.



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Panoramic photos of Wisloe site with Cotswold AONB in background.



Infrastructure and impact of imbalance. Infrastructure will be critical to the success of the updated Local Plan and yet, the Draft Local Plan proposes locating nearly 80% of new housing from Cam southwards. This offers a completely unbalanced structure and would impose significant strain particularly on M5 junction 14. Further load excerpted by inappropriate development at Wisloe would overload transport links and make plans for all development in the south of the district unviable and unsustainable.

Conservation. The Severn Estuary and Upper Severn Estuary are designated as Sites of Special Scientific Interest (SSSI), Special Protection Area (SPA), Special Area for Conservation (SAC) and RAMSAR site. The Severn carries these national and international designations for a wide range of reasons to protect the rare and special habitat, features and wildlife. This protection extends beyond the immediate estuary into the surrounding environs. Rare breeding and migrating birds are a particular feature and many of these internationally recognised, threatened species utilise the lowland plain, Severn Vale grazing marshland and fields to roost, rest, breed and feed. Snipe, Redshank, Lapwing and Curlew all feature on this list and are threatened to a greater or lesser extent. The International Union for Conservation of Nature produces the universally accepted Red Data list of highly threatened species. Lapwing and Curlew in particular face a high level of current threat. They are endangered at a national and international level, are on the Red Data list and are afforded commensurate, recognised national and international protection. Many of the fields proposed in this development are extensively utilised by these species as a high tide roosting, resting and feeding site. These species require wide, open areas where they are secure from predation and destruction of this valuable safe and secure space could not be mitigated. The Ernest Cook Trust need to acknowledge that they are content to destroy this increasingly rare Curlew habitat for this equally rare and endangered bird.

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Series of views showing Curlew feeding and resting in environs of proposed development site – M5 Motorway adjoining south of proposed development site on raised causeway in background – photos taken December 2018 & January 2019.



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Noise and pollution. The identified Wisloe site locations are sandwiched between the railway and the M5 to the east and A38 to the west. This infrastructure is inherently noisy and, particularly but not exclusively in the case of the motorway, highly toxic. The motorway is on a raised embankment in the south of the site below the A4135 road and, as a consequence, the noise problem is exacerbated. The acoustic bunds and barriers required to bring any development within legal minimum standards would present a significant challenge and, in the case of the southern section where the motorway is raised from the surrounding topography by 10 meters or so with the mainline railway at its base, any barrier would be impractical in real terms. There are no feasible measures available that could protect any future residents from the toxic fumes emanating from the nearby neighbouring transport infrastructure. The Sustainability Appraisal that accompanies the draft report recommends that residential development should not be sited in close proximity to unsuitable neighbouring uses including strategic road or rail networks (6.83 P133). The whole of the Wisloe proposed site is adjacent to these 'unsuitable neighbouring uses'. The M5 motorway forms the entire eastern boundary on the northern component of the proposed site. The southern site location has the M5 motorway and mainline Gloucester/Bristol railway as its eastern boundary, the A38 trunk road to the west and the A4135 to the north. It is, in effect, an island surrounded by this infrastructure.

The developers report on noise clearly indicates that the whole of the site is outside parameters for residential and commercial development. A questionable sound reducing bund is promoted on part of the site as a potential solution. Real life experience at Hunts Grove, where a similar bund has not brought new houses within required limits, demonstrates that this solution cannot be relied upon to address the challenge. The raised motorway, main line railway, A38 and A4135 on the remainder of the proposed site, effectively preclude development of any sort being delivered within required legal noise parameters. The developer's consultant acknowledges that effective noise attenuation on this part of the site is not possible. The consultants, presumably seriously, without any credible evidence suggest that orientation of buildings should be considered as the mechanism to address this issue. Their optimism is admirable but in the absence of any evidence or realistic alternative to bunds, bringing this site forward for development could not be credibly justified at inspection and would put the rest of the Draft Local Plan at risk.

Archaeology. The A38 corridor is a recognised Roman road and its environs are known to contain important settlements. Contemporary archaeological surveys carried out on fields in the southern portion of the proposed site reveal a rich seam of ancient materials. The presence of a high-grade Roman settlement of some standing near to the railway line is suspected and any proposal associated with the area would require examination by Heritage England. It would be anticipated that scheduled ancient monument status would follow.

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High Pressure Gas Pipe. Wales and West Utilities have confirmed that there is a high pressure main gas pipe that runs directly through the middle of the proposed site south of the A4135 then across the western corner of the northern section . There are strict and significant restrictions that dictate development in and around this critical infrastructure with wide margins for protection that need to be properly considered. When assessed in combination with the limitations imposed by the presence of road and rail infrastructure and recommendations in the Sustainability Appraisal to locate housing away from these neighbouring uses (6.83 p133), the viability of this proposed site is further questioned and would pose a significant risk to the overall plan if taken forward to inspection.

Cables. Buried main cables are present on the site. These need to be identified, mapped and considered to determine implications for site viability.

Oil Pipeline. It is believed that a main oil supply pipeline may cross the site. The location and nature of this infrastructure needs to be established, mapped and considered to determine implications for site viability.

High Pressure Gas and Cable Markers at Wisloe



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Flooding. To a greater or lesser degree, the whole of the Severn Vale is subject to flooding. The River Severn poses a recognised threat in terms of tidal flooding but its real influence is on the way fluvial flows are managed. The Slimbridge Parish has suffered more than most from regular flooding incidents. The existing residential communities exist by virtue of a drainage system that has become increasingly overloaded. Years of neglect, inappropriate unauthorised connection and development has added to the intrinsic difficulty of draining a low lying, naturally semi wet landscape and river valley floodplain. Severn Trent Water, under pressure from local politicians and the community, undertook major remedial action which, it is hoped, will help to alleviate some of the problems that have been part of life for many residents. The £2 million scheme undertook to grout existing damaged and leaking pipework and replace where necessary in order to prolong the life of the substandard system. This provides a reduction in risk at best. It has been recognised during the research and modelling work carried out by Severn Trent that the nature of topography and location limit the ability of any realistic complete flood prevention solution. The whole area sits within a minor aquifer with high permeability. Tidal blockage limits the ability to artificially channel water flows away from residential form. This combination of factors raises concerns that interrupting the water retention capacity of an area with a significantly larger footprint than the existing communities, would have a severe adverse effect. Developers would claim an onsite SUDS system could manage flows from new properties they propose but the impact of removing this vast flooding buffer to existing residences could not be demonstrated. It should also be noted that the River Cam provides the major conduit for fluvial water flows away from much of the Slimbridge Parish including the proposed Wisloe site. It also serves a similar function for Cam and Dursley. The river Cam was modelled and modified in the early 1980's to accommodate increased flows from development at that time with a minor buffer. Development, particularly nearby in Cam since this work took place, has dwarfed the original design parameters. There is now a significant danger that the further approved development in Cam in combination with draft proposals will overwhelm capacity within the river and result in severe flooding downstream. Regardless of the Draft Local Plan next steps this threat needs to be addressed as a matter of urgency.

Wisloe Action Group. The Wisloe Action Group (WAG) was formed by local people to constructively engage with proposals in the Emerging Strategy and Draft Local Plan. They have accessed and engaged advice, technical expertise and professional opinion to produce a detailed report that summarises, in particular, some of the challenges incumbent with proposals at Wisloe. I understand this will form the basis of their ongoing determination to shape a Local Plan that genuinely responds to consultation feedback, takes the challenges highlighted seriously, properly considers site selection and the available alternative strategies favoured by local people in the consultation process. The expertise and professional advice they have accessed and referenced is beyond the scope or capacity of my submission. I endorse the technical and professional comments in the WAG report. This comprehensive and commendable document produced by the local community with expert input should help in establishing the genuine status of proposals at Wisloe beyond the vested interests of site owners, promoters and their agents. I look forward to seeing the issues raised in their report being given proper consideration and, where answers are required, a timely response is provided in order for them to prepare, if required, to put their case in the next stage.

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Conclusion.

The current proposals for development at Wisloe should not be considered for inclusion in the next phase of Stroud District Councils local plan. There are no large residential estates anywhere in the rural Severn and Berkeley Vales. Development has formed organically and respects the flow, form and feature of natural landscape. 'Garden' and 'Village' are attractive terms for PR people to conjure with but rural residents recognise the deceit. Covering vast tracts of valuable, highly productive farmland with an urban estate is not 'nurturing an alternative seedbed' or 'finding new ways to learn from the land' as has been egregiously suggested by the landowners Ernest Cook Trust. It is despoiling a timeless, pastoral rural landscape and blighting lives for commercial gain.

Alternative strategies are available including other major potential sites more suited to large development that could balance pressure across the district. In combination with a greater focus on dispersal and reassessment of overall numbers, the Draft Local Plan could be adapted to respond more accurately to previous consultation preferences, maintain the rural nature of Stroud District, be more sustainable, meet housing delivery targets and offer a more robust plan for inspection.