

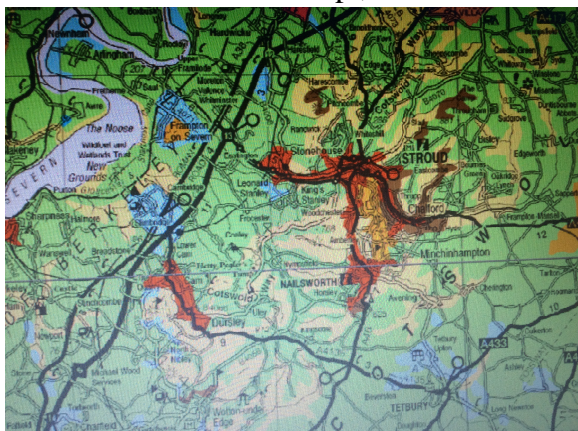
I do not support the local plan to meet the future housing growth of Stroud District and have the following objections and comments to make regarding the proposed development at 'Wisloe Green'.

1.Agricultural Land classifications

One of my main concerns in this proposal is that the agricultural land at 'Wisloe' has been reclassified and down graded. The latest survey has been commissioned by the owners of the land who want to develop it.

The land at Wisloe has always been classed by Natural England as Grade 2-very good agricultural land and should not be considered for development. It has held this classification for many, many years since the 1930s and suddenly it has been downgraded to 3b ?

As can be seen from the map , this land is one of a small number of such areas of land in the Stroud



<u>Grade</u>	<u>Description</u>
1	Excellent
2	Very Good
3	Good to Moderate
4	Poor
5	Very Poor

district and if building is allowed on this land then the availability of 'Very Good 'agricultural land diminishes even further in this area .

We live adjacent to this land and know that there is a high yield of mixed crops every year so we find it hard to believe that is worthy of being downgraded as per the survey commissioned by Ernest Cook Trust and GCC, who happen to be the land owners. It was not an independent survey and I understand that that the soil samples taken at this latest survey are almost identical to previous surveys, yet the land has been been downgraded this time.

As the current and future trend is heading toward more 'plant based' diets , then good quality land will be required to meet demands for future production. Will SDC, in allowing this proposal, decrease land availability for such production in this area ?

At Prime Minister's Questions on 8/1/20 the Prime Minister stated that development should take place on Brown Field sites. It sounds as if there could be a change in policy re building so surely SDC should wait until this has been clarified before building on green field sites..

How do SDC justify the loss of such good agricultural land when there is lesser graded agricultural land and brown field sites available ?

Are SDC confident that the decision to down grade this land is appropriate given that it is not an independent survey ?

Given the concern that residents have regarding the regrading of this land should SDC ensure that an independent survey is carried out before this is included in the Local Plan ?

2.Development in the Berkeley Vale

In the 2019 Emerging Strategy Consultation document, the favoured option of residents was dispersal rather than large settlements as an infrastructure already exists around established centres. There was overwhelming rejection of the 'Mini Visions and Priorities and 'Key Issues and Priorities' in that consultation report by residents in Cam and Dursley and the Berkeley Vale .This

consultation and results seems to have been completely ignored in favour of a 'quick fix' site at Wisloe. SDC's Settlement Role and Functions Study in 2018 shows that the Berkeley Vale has the highest commuter miles of the district and the fewest jobs. Car use and ownership is the highest due to the lowest levels of employment, amenities, infrastructure and poor public transport.

The majority of employment is in the north of the District and there is better infrastructure in place to deal more effectively with an increased number of housing developments.

The proposals in the plan are to build over 6000 houses in Wisloe, Cam and Dursley and Berkeley . This represents 80% of the total requirement for Stroud District, all located in the south of the District. The impact such a large amount of housing has not been assessed in any documentation that SDC have produced.

This is a disproportionate spread of new development in the south of Stroud District given the current infrastructure in the area so :

What is SDC's plan to assess the impact of an extra 3000 + houses built within a 2 miles of Wisloe and a further 3000 built along the A38 corridor at Sharpness and Berkeley ?

3.Impact on our Rural community

The Stroud area is officially designated as a Rural District with the Berkeley Vale being the most rural part of that District. That is why we and many other local residents chose to live in this area. We were happy when SDC's Core Strategy would ' aim to protect and enhance the natural and built environment of the District'. This appears no longer to be the case and this proposal goes against the philosophy that SDC are telling the residents they wish to pursue and will destroy the very nature of why it is a lovely place to live.

1500 houses will swamp the three existing villages (Slimbridge,Cambridge and Gossington) and change the landscape, environment and rural atmosphere for existing residents and goes against Stroud's published aims.

How can SDC can allow this large estate to be built when they wish to maintain the rural nature of the area ?

4.Rural Settlement Classifications

It would appear that Wisloe has not been selected on an evidence based process. It did not appear in the original 2017 consultation as an option. It was only when Gloucestershire County Council and the Ernest Cook Trust wanted to sell their land that the proposed development that Wisloe appeared as an option. Under SDC's own policy the area would have been rejected as it was Tier3b and 4a.

SDC have classified Slimbridge as Tier 3b and Cambridge Tier 4a which comes with recommendations for limited development to meet local housing needs . The properties in the 'Wisloe' area all have Cambridge postcodes and it is considered that what is happening here is a huge extension to the village of Cambridge, which is again contrary to SDC's own policy of building in Tier4a locations.

SDC also recommends that the priority for larger scale development should be at Tier1 and Tier 2 areas, which are towns and larger villages.

From the proposal by SDC to include the land at Wisloe in the Local Plan,it is clear that SDC consider that Tier3b and 4a sites can be developed on a massive scale so previously rejected sites should be looked at again .This should allow SDC to follow a Dispersal policy as favoured in the consultation feedback and demonstrate a fairer and more consistent approach.

Will SDC now consider a dispersal policy in similarly classified areas and revisit previously rejected Tier3/3b/4 sites ?

5. Coalescence

It is important not to view the Wisloe proposal in isolation as there are also housing development

schemes in the Local Plan to build many more houses in Cam. As a result of these proposals the developments in Cam and Dursley will expand Cam down to the M5 where it will border on the proposed development at Wisloe, thus making it a large urban sprawl from Dursley to Slimbridge and Cambridge. The M5 should not be considered as a natural boundary between the developments. It is not a natural break between housing estates, but a noisy and polluting feature for people who will be living next to it. It will ensure that Slimbridge and Cambridge will cease to be villages in their own right as the development at Wisloe will coalesce with Slimbridge, Cambridge, Gossington, Cam and Dursley and create one large urban town. 1500 houses is more than three times the whole of the Slimbridge Parish and will overwhelm the villages and strip them of their individual nature. It is a disproportionate development.

SDC rejected sites and sited coalescence as a reason for doing so :-

'Upthorpe has been rejected as a 'housing development'' would erode the separation between Cam and Upthorpe'

'Development would encroach on the sensitive visual gap between Wotton under Edge and Kingswood eroding the separation and distinct nature of the two settlements'

The Draft Strategic Plan also states SDC's Vision to 2040 - 'We enjoy a high quality of life within our healthy, vibrant and diverse communities, which have a strong sense of their own identity and local distinctiveness' – This is clearly being ignored in proposing the development at Wisloe SDC Policy ES7.Paragraph 6.43 states that '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 the impacts on the open countryside'

It would appear that SDC are suggesting development which against their own policy and inconsistencies in decision making regarding coalescence. How do they account for this ?

6.Infrastructure

The proposal at Wisloe will make a huge demand on the limited infrastructure in the local area with over 7000 new residents as well as existing residents at Wisloe, Cam and Dursley all wanting to use the same doctors, dentists, schools etc There are no plans by SDC to improve parking or road systems in Cam and Dursley where most of the services are located despite the ongoing development in those areas.

There is no credible assessment included in the plan of how this will impact on existing residents. Access will probably be via car as it is too far to walk from Wisloe and there is no proper pedestrian provision along the busy A4135.I am concerned that developers of the sites are not under an obligation to provide these services. Whilst the site is under construction there will be an increased demand on existing services until such services are provided by the developers, if at all.

What are SDC's plans for dealing with the increased demand on services whilst the development is being built?

What can SDC do to guarantee that the developers will provide the infrastructure on the proposed site to meet needs of the residents ?

7.Transport and Pollution

Another of the big issues with this proposed site is the impact of increased traffic and the consequential increase in pollution and noise.

The site is located between the A38 and M5, two of the busiest roads in the area and especially so during the summer months. There will be a vast increase in traffic not only from commuters from Wisloe (potential over 3000 vehicles) but from Cam, Dursley, Sharpness, Berkeley and other

developments along the A38, such as those in the South Gloucestershire Council area such as Thornbury and Falfield.

It was recognised in the report commissioned for the developers of the Wisloe site that Wisloe and Cam are too far away from employment areas such as Bristol, Gloucester and Stroud for them to walk or cycle to work and it is expected that residents will use their cars to commute. It also recognised that Wisloe would be a dormitory site, far from the employment areas and again a report commissioned by the Earnest Cooke Trust and GCC stated that the A38/M5 junctions 13 and 14 are running at close to full capacity.

In another report commissioned by the developers, Ernest Cooke Trust and Gloucestershire County Council, it was identified that noise levels would be in excess of 80 dB which is above permitted level of 50 dB. The advice given in the report was that householders could not comfortably open their windows for ventilation due to the noise levels.

The train station at Cam is already suffering from a dangerous issue with commuters parking in the road due to over capacity and no doubt when the development at Box Road is completed commuters will use that estate to park, which will have a detrimental effect on the residents there. There is also a question as to whether the station is large enough to deal with the anticipated numbers of extra commuters, given that there will be a need for extra carriages. Having said that, SDC's own survey shows that only 1% of residents use the train and it is already at full capacity!

There will be major congestion on an already problematic road system. Department of Transport figures shown that there has been a year on year increase of traffic along the A38 between A4135 and A419 and as well as cars, there has been an increase in light and heavy goods vehicles. The only decrease has been in public transport i.e. buses.

Dangerous emissions will increase for new and existing residents due to the increased traffic flows and this is again in conflict with SDC's 2030 carbon neutral policy and their commitments to residents' health and well being. This will decrease the standard of living for existing residents who currently enjoy less issues with toxic fumes. Standing traffic on the M5 is not uncommon, particularly in the summer or following an incident and pollution levels are bound to increase, particularly for people who live closest to the motorway.

Are any more realistic and independent surveys going to be carried out?

A more sensible option is to build homes closer to where people work because SDC cannot guarantee that public transport will be improved. Has consideration been given to this aspect?

8.Flooding and Drainage

It has always been recognised that Slimbridge has issues with foul and water run off. Residents in Cambridge also have issues with a high water table. During the recent moderate rain a constant run off was evident for over 4 days in Dursley Road from the fields along to its junction with Narles Road. This run off was from flooding in the corner of the field at the end of the proposed site adjacent to the houses at Dursley Road. If building or tarmacing of paths and roads take place in this field then this flooding will be exacerbated and will result in more run offs into Dursley Road. Building 1500 houses with associated roads and paths will remove the natural drainage benefits of open farmland and create huge amounts of foul and run off water and this is a major concern for residents.

What will SDC do to ensure existing issues are not exacerbated because if this land is included in the Local Plan and subsequently developed, the Council and developers will accept no responsibility for subsequent flooding. Has the Environment Agency been consulted re any extra discharge into the River Cam which will inevitably occur?

9.Housing Targets

SDC are showing in the Local Plan that they intend to build more houses than they are required to under the Government target. SDC are proposing to build 15,000 houses when the target set for

SDC is actually 12,750 over 20 years. Population growth in that time is expected to be 20,000 so clearly there is not a need for 15,000 new homes.

Why is SDC building more houses than it needs and is Wisloe actually needed to meet the Government target ?

10. Alternative Sites

SDC are proposing to build 80% of their housing target in the Berkeley Vale . This will create two huge dormitory settlements and coalesce Slimbridge, Cambridge, Gossington, with Cam and Dursley .

It was evident from the Emerging Strategy that this was not the favoured option of the residents, the majority of whom appear to have been ignored.

As Cambridge and Slimbridge are Tier 3b and 4a settlements then other similarly classified settlements should be looked at again in a dispersal policy that would be fairer and more proportionate . This would also spread the load on infrastructure across the District which would help in making it more sustainable and manageable.

Hardwicke, Whaddon and Stonehouse are the most appropriate locations should larger sites be required to meet any shortfall as they are nearer centres of employment with far better transport links and facilities and will spread houses throughout the District and not just in the south of it.

In conclusion, SDC state in the Local Plan that ' We have considered community views expressed through parish plans and other documents. We have taken into account all of the views expressed during these consultations in preparing the Local Plan.

41 sites were identified in the Emerging Strategy in May 2019 and only four of those sites received overwhelming opposition. One of those sites was Wisloe.

Residents in Berkeley Vale overwhelmingly rejected the 'Mini Visions and Priorities' and 'Key Issues and Priorities ' for the area, It appears that SDC have ignored the views of the existing residents.

SDC have also ignored many of its own policies, recommendations and requirements and consultation feedback in proposing this site at Wisloe.

Dispersal was the favoured option and this seems to have been overlooked in favour of a large quick fix site with easy access to the A38.

There are opportunities for a more dispersal approach and these should be revisited using the other 37 sites and in doing this SDC will show that the democratic process has been followed.

Houses in the 'Wisloe' area are still classed as being in Cambridge and their postcodes and addresses confirm that. Indeed, up until this process Wisloe did not exist as a hamlet it was known only as a road namely Wisloe Rd . This development appears to be a huge extension to Cambridge which given its status as Tier 4b is totally inappropriate .

However, if SDC are determined to build larger settlements in Tier 3b and 4 locations then there should be a transparent, consistent and independent appraisal of all similar tier areas before the Local Plan is finalised.

Is Stroud District Council going to carry out such an appraisal ?

