

Part B – Please use a separate sheet for each representation

Name or Organisation: CPRE Gloucestershire

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

Paragraph **Policy** **Policies Map**

4. Do you consider the Local Plan is :

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

Please tick as appropriate

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

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Pre-submission Stage

Representations by CPRE Stroud and Berkeley Vale Groups

Introduction

CPRE broadly supports the overall strategy of this well-produced Local Plan. However, we have some significant concerns about it which are set out in relation to specific policies or proposals.

Section 2.5: Housing/Core Policy CP2

CPRE notes from Table 2 that the minimum residual housing requirement is 8,005 dwellings, and from Table 3 that total supply for the Plan period up to 2040 is 10,340 dwellings. This means that there is nominal overprovision of 2,335 dwellings or 29%. Even making due allowance for the "minimum" in relation to requirements, the use of the phrase "at least" in the first sentence of Policy CP2 and the need for some flexibility, CPRE considers this surplus to be excessive and not justified.

There has long been net out-commuting from Stroud District, to Gloucester, Bristol and South Gloucestershire in particular. This has increased to the extent that the Stroud Travel to Work Area (TTWA), defined (as are all TTWAs) on the basis of the origin and destination data from the Census, disappeared and the area it covered mostly included in expanded TTWAs for Gloucester and Bristol.

One consequence of the current approach, if the rate at which local jobs are created does not keep pace, will be even greater levels of out-commuting, mostly likely by car and therefore inconsistent with the principle of sustainable development. The extent of control exercised by the planning system over housing and employment is quite different. If land is allocated for housing, it will almost certainly be developed. However, if land is allocated for employment uses, it may not be developed as quickly as intended or produce as many jobs as expected. There is little in the way of footloose activity in the manufacturing sector (B2 uses) and demand may be for B8 uses which provide few jobs in relation to the land taken. Allocating land for employment uses is merely a necessary condition for success, not a sufficient one.

Notwithstanding what we say about the certainty of housing allocations being developed, we note that figure E in Table 3 refers to the subtraction of sites considered "undeliverable". This amounts to 620 dwellings (a figure which has to be calculated rather than appearing in the table itself) and there is nothing about the identity of these sites or even general reasons why they are considered undeliverable.

The extent of overprovision is so great that CPRE considers that the Council should reconsider the size of the strategic allocations in the Berkeley Vale part of the District.

Tests of soundness: not justified.

CPRE Gloucestershire Response to Stroud District Local Plan

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

Change sought: A reconsideration of the scale of the strategic allocations in the Berkeley Vale part of the District.

CPRE Gloucestershire Response to Stroud District Local Plan

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

Paragraph **Policy** **Policies Map**

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Core Policy CP2: Whaddon

We note that a major site at Whaddon adjacent to the southern administrative boundary and built up area of Gloucester is depicted on the Map 3 as a safeguarded site – rather than an allocation. We understand the meaning of the term safeguarded in this context, usually if not always employed in relation to land taken out of the Green Belt and safeguarded from development in the current plan period to be first in line to meet development requirements in the next. The JCS for Gloucester, Cheltenham and Tewkesbury adopted in December 2017 takes this approach in respect of land in Tewkesbury Borough.

However, the land at Whaddon is not in the Green Belt and more importantly Stroud District Council is not a JCS authority and by definition none of its territory is part of the JCS area. The SDLP makes quite specific statements about its capacity (3,000 dwellings) and timing (by 2040) which in CPRE's view prejudices the strategic choices to be made in the JCS Review – on which negligible progress appears to have been made.

Tests of soundness: not justified.

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

CPRE Gloucestershire Response to Stroud District Local Plan

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Change sought: a clearer explanation in the text of the SDLP about the status of land at Whaddon and a less prescriptive statement about its capacity and timing.

Change sought: A reconsideration of the scale of the strategic allocations in the Berkeley Vale part of the District.

Name or Organisation: CPRE Stroud District

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

Paragr aph	3.1.8- 10	Policy	ES7,S06,DCP1,CP2,HC1,D HC5,DHC6, CP14, ES3, ES6, Es10, DES2	Policies Map	PS05 and PS05a
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CPRE objects strongly to the inclusion in the Stroud District Council (SDC) Revised Local Plan of sites in Minchinhampton, off Tobacconist Road (PS05 and PS05a). This site contravenes the following policies in the revised Local Plan: ES7, SO6, DCP1, CP2, HC1, DHC5, DHC6, CP14, ES3, ES6, ES10 and DES2.

CPRE disputes the housing need assertion from Stroud District Council. In preparation for their NDP in 2016 the parish council commissioned a Housing Needs Survey from GRCC that outlined the need for 24 affordable houses. Their NDP, published in 2016 and now effectively part of the Stroud Local Plan, expressed the community wish that these were scattered in the built community in small groups of 5 or 6 rather than in a large development. Minchinhampton Parish has grown by just over 8 houses per annum historically, suggesting that there is plenty of scope for the NDP plan of scattered homes to achieve the 24 affordable target within the next few years without any input from this development. It should also be noted that permission for over 100 houses on

brownfield land has been granted recently and that these houses are as yet unfinished.

SDC claims that there is a need for 98 market houses. CPRE maintains that, based on resistance to significant building in the AONB in the NPPF (paragraphs 171 and 172) and also in the Cotswold National Landscape (CNL, formerly Cotswold Conservation Board, CCB) management guidelines, there is no legal argument for pressuring the AONB to provide market housing. Furthermore there is brownfield land in the parish (Dark Mills) as yet undeveloped which is a much more suitable location than this one, and market housing is already under construction at 2 sites in the parish, providing over 100 houses at Wimberley Mills and 17 Butt Street.

Turning to the sites themselves, there are problems with both.

- Access is a burning local issue that has aroused a large amount of local anger and concern. The access for PS05 suggested in the Revised Local Plan is not deliverable; access through the housing estate to the north is impossible. The site would be approached through a long stretch of quiet narrow streets in which children play and residents park. Alternative access is not possible for one reason or another, mainly on account of narrow lanes or third party land ownership.
- This site is a green field that sits within the Cotswold Area of Outstanding Natural Beauty (AONB) and outside the settlement boundary of the town. It is under 1km from Minchinhampton Common, an SSSI of unimproved limestone grassland and home to the largest Scheduled Ancient Monument in the country, which inter-connects with Rodborough Common, an SAC, under 3 km from the site. Both commons are home to numerous rare plant and animal species, and are grazed for 6 months of the year by free-ranging cattle with unimpeded access to the road network. This major development and the inevitable increase in vehicular and foot traffic would prove harmful to this delicately balanced ecosystem as well as to the delightful landscape and views in this part of the district. This would be contrary to NPPF paragraph 175(b).
- PS05 abuts the Bulwarks Scheduled Ancient Monument. While it would be highly likely to be damaged in the construction process, it is also highly likely to be used by residents once the development is completed, for leisure and to access the playing fields..
- This field has commoners' rights, meaning that the owners of the field can graze their cattle on the commons. These fields (run-back land) are essential for winter grazing for the cattle and for use when diseases prevent the cattle being released onto the common in the summer. Eating away at these fields which are vital to the health of both commons including the Rodborough Common SAC is to be deplored as it causes a permanent reduction on the pool of potential livestock for the commons. It is important that all fields with commoners' rights are maintained in perpetuity and not lost to development if the commons are to maintain their status.
- It should be noted that the Habitats Regulation Assessment of Stroud Local Plan (HRA) dated 23 May 2021 has failed to consider the effect of the loss of run-back land on the ability to manage Rodborough Common SAC. The loss of run-back land is also contrary to Minchinhampton NDP (2018) Policy MPEnv4, bullet 3.

- The pedestrian access suggested for PS05 is undeliverable. The route is very narrow and the existence of rights of access by car will make cycle, horse and pedestrian use dangerous.

The life of the commons and their ecological and leisure importance is vulnerable to further damage by increasing traffic. Reasons for this are far-ranging – the traffic poses danger to the cattle but also changes the commons from a place on which to enjoy peace, tranquillity and the pursuit of leisure activities to a commuter route. When asked during the NDP process what was valued most about the parish, the commons and the cattle were top of the list by far. The traffic in the parish was by far the biggest complaint. Until recently cattle deaths were in double figures, and the Hayward (who is in charge of the cattle during the grazing season) estimates that all of the c.500 beasts that graze the commons are hit by a car at some point in their lives. These incidents are cruel to the cattle, extremely distressing for all involved and demotivating for the farmers who graze their cattle on this important landscape.

SDC is currently actively promoting its Stroud Landscape Project which aims to create wildlife corridors throughout this rural part of the district, around the commons. The removal of these fields is contrary to the council's own objectives in this regard as it will inevitably create a barrier to wildlife connectivity rather than a means of enhancing it.

Minchinhampton town centre and Conservation Area is almost entirely constructed of small houses fronting straight on to very narrow streets with narrow pavements. A few streets are just about capable of handling two-way traffic but most are single carriageway. In particular all accesses to the town centre are via single-carriageway roads. Drivers often drive on the pavements in order to squeeze through the town's roads. Increasing the traffic to the town centre through further development would heavily impede traffic flow as well as being dangerous for those accessing the pavements from their houses.

Minchinhampton has very limited employment opportunities. Creating living space in places where a commute is inevitable is unsustainable and unfortunate when local efforts are focussed on reducing the impact of commuter traffic across the SSSI and neighbouring SAC rather than adding to it. The bus service is too limited to be helpful in this regard.

The school is already beyond capacity. It is a popular school with local parents as well as those in the wider district. Parents with children moving into the development will be entitled to a place at the school which will lead to overcrowding at the school for the foreseeable future.

There is also the worry that the development of this site will act as an unfortunate precedent for increased greenfield development on this side of town. The inclusion of PS05a already sets the scene for increasing this site even further in the near future, and this can only worsen as field after field falls to the excavator leaving the local farming community with nowhere to go.

CPRE urges the inspector to remove these sites from the Stroud District Local Plan. Mitigation measures or compensation through CIL are no replacement for the permanent devaluing of the town through overdevelopment, endangering the people who live immediately on the access roads and the loss of a vital green field in this delicate and valuable ecosystem.

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The complete removal of sites PS05 and PS05a from the Stroud District Revised Local Plan.

Name or Organisation: CPRE Gloucestershire – Stroud District

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

Paragraph	3.1.11	Policy	DCP1 CP4 CP5 CP8 CP9	Policies Map	PS06
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CPRE objects to the inclusion of site PS06 The New Lawn, Nailsworth - as currently constituted - in the Stroud District Council (SDC) Revised Local Plan. CPRE is not objecting to the principle of development on this site, but instead to the proposed level of density, failure to address access issues in any sufficient detail, lack of any affordable housing or local connection requirement, and the resulting non-compliance with existing and proposed SDC policy.

At approximately 2.7ha, the site has a proposed density of approximately 33 residential units per hectare. Land to the immediate South, West and North of the ground (within the AONB) are very sparsely populated and the site's eastern

boundary is additionally largely surrounded by the playing fields of Nailsworth Primary School. Whilst the proposed density is broadly equivalent to existing development on Highwood Drive, this development only abuts a small portion (40m) of the site boundary. Development at the proposed density is therefore inappropriate given the wider site context.

As currently drafted, the requirement for a developer to submit a masterplan detailing proposed infrastructure changes is insufficient considering the challenging access requirement of the FGR site. Immediately to the West of the proposed development Tinkley Lane narrows to single track, which continues much of the way to Nympsfield. This route will be used by residents accessing Cam & Dursley railway station as well as being the fastest route to the M5, and is a traffic blackspot with significant use from existing residents. The Local plan additionally does not consider the impact that such a substantial additional development would have on congestion within Nailsworth itself, in particular the roundabout at the junction between Spring Hill, the A46 and George Street, which would be used by residents of the site commuting to Stroud, Bath or towards Cirencester/Swindon and is already heavily congested. Traffic along Spring Hill at this roundabout also have restricted views of the A46 Northbound due to the position of the building of 1-2 Bridge Street, and increased traffic will create a further accident risk. Additionally, the plan pays no consideration as to how such development could facilitate improved cycling infrastructure within Nailsworth itself, in particular the linkages between the FGR site and the National Cycle Network Route 45. The site is also relatively poorly served by public transport.

Unlike other sites contained within the plan, there is no recognition of affordable housing requirements within Nailsworth beyond that identified for the district as a whole, nor of the issue of the provision of housing to those with a local connection. The issue of affordable housing within Nailsworth has been recognised as an issue by SDC with the current development of 20 affordable homes at Ringfield Close

As constituted, the site is therefore in non-compliance with the following policies:

- Core Policy DCP1: The site does not prioritise use of public transport and, in particular the use of bicycles. Given poor road access, the site will increase congestion within Nailsworth and along Tinkley road.
- Core Policy CP4: The site does not take account of connectivity, reduce car dependency, or improve transport choice. Given the sites density and lack of significant dense development around large parts of the site, the site does not create a place with a locally inspired sense of place nor work with the sites topography. No attention has been paid to bicycle storage.
- Core Policy CP5 and CP8: The site is not at an appropriate density acceptable to the local townscape, nor is it readily accessible by bicycle
- Core Policy CP9: SDC has not considered the tenure, size and type of affordable units on a site by site basis for this allocation

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The following amendments are suggested to Local Site Allocation Policy PS06 in accordance with the preceding comments on non-compliance with policy.

Land at The New Lawn, as identified on the policies map, is allocated for a development comprising approximately 30 dwellings and associated community and open space uses, together with enabling infrastructure, including provision of affordable housing for those with a local connection. Particular issues to address include ensuring existing community and sporting uses are partly retained or replaced elsewhere, enhancing local biodiversity, the improvement of road access, in particular along Tinkley Lane and in Nailsworth town centre, improved cycle parking and access, and enhancing the landscape on this AONB edge of Nailsworth. A masterplan to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner.

Name or Organisation: CPRE Gloucestershire – Berkeley Vale District

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

Paragraph **Policy** **Policies Map**

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Stonehouse North West

Decisions outside SDC’s control but vital to proposed developments:

It is essential that commitment and start date is obtained from Network Rail before any work is started on this site to ensure that enough space is available for the urgently needed bridge for pedestrians and cyclists on Oldends Lane.

Stonehouse will need a new station for the Swindon-Gloucester line as the current site is inadequate for future needs. No decision should be made on this site until the site for a new station has been agreed.

Agreement, site and completion date for a station on the Bristol railway line is essential.

All large developments in the Stonehouse area are unsustainable without national infrastructure improvements to trunk roads, M5 and the rail network. These are out of the control of SDC

CPRE Gloucestershire Response to Stroud District Local Plan

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Agreement at National level for funding improvements to the rail system, M5 and trunk roads with provision dates. Without this we are building a traffic jam.

This development is yet more urbanisation of the Severn Vale and of the Stroud Stonehouse M5 corridor. It will be visible from the Cotswold escarpment. It is important that there is adequate tree planting throughout the development to break up the mass of urban landscape when viewed from higher land and help reduce climate change and air pollution. Green corridors for wildlife should be included in the initial layout and preserved.

PS19a – 4: Where is it proposed to site a new secondary school? Sustainable transport links to this unallocated site need to be incorporated at this stage

PS19a – 4, 6, 12, 13: It is important that recreation facilities and cycle routes are constructed at the beginning of the construction of the development to encourage the habit of walking and cycling. The primary school should also be built at the beginning, designed so that it can serve as a community centre as well as a school ensuring there is dedicated space for people to meet and build a community.

This site combined with Greater Oldbury is surely large enough to accommodate Places of Worship. Space should be made available for these.

PS19a – 6, 8: Developers must not be allowed to increase the density of build at the expense of green space for sporting facilities or proposed ecological green space.

Streets must be wide enough to allow on street parking where there is only one parking space allocated per residence.

Name or Organisation: CPRE Gloucestershire Berkeley Vale District

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

Paragraph	3.2.18-26	Policy	CP4, CP11, CP13	Policies Map	PS20
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Stonehouse Eco Park – South side of A419

Decisions outside SDC’s control but vital to proposed developments:

It is essential that commitment and start dates are obtained from Network Rail before any work is started on this site.

Stonehouse will need a new station for the Swindon-Gloucester line as the current site is inadequate for future needs. No decision should be made on this site until the site for a new station has been agreed.

Agreement, site and completion date for a station on the Bristol railway line is essential.

All large developments in the Stonehouse area are unsustainable without national infrastructure improvements to trunk roads, M5 and the rail network. These are out of the control of SDC.

This is a green field site with no outline permissions.

Stonehouse Eco Park North Side

PS20 North Side already has outline planning permission for development on a green field site. The traffic arrangements remain optimistic.

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Agreement at National level for funding improvements to the rail system, M5 and trunk roads with provision date. Without this we are building a traffic jam.

This development should not be considered or allowed without submission of a detailed EIAS. The restoration of the Stroudwater Canal system should not drive the acceptance of this development as it is tail not the dog.

3.2.20, 21 The flood zone within the Industrial Heritage Conservation Area is a sensitive area for wildlife which it is hoped construction of the canal will not spoil. However, the impact of SuDS may. The construction of impermeable practise pitches and parking areas must not be permitted as this will increase surface water run off and the need for SuDS.

No Environmental Impact Assessment has been submitted (2020/0130/EIAS) or assessed for protection of The Industrial Heritage Conservation Area and its associated wildlife. Other points to be covered are:

- Protection of Roman villa and its farmed landscape,

- Protection of the neighbourhood conservation zone – see Eastington Parish Council letter re 2020/0130/EIAS of 13/03/2020.

Any development destroying the site of the Roman villa must be avoided. The remains can surely be incorporated as part of the design layout as has been done on a site at Cam.

Lighting for practise pitches, carparks and paths must be directed downwards, not left on overnight or light up the whole surrounding area. (Light pollution)

It would be strategically and environmentally better that all commercial buildings and their parking are sited in the higher, north west corner of the site which would reduce the traffic noise and light pollution for those living at William Morris House and Meadow Mill.

PS20 Point 5 – there is no net gain to local biodiversity – The biodiversity is already there. The total area is being reduced and what remains of it is being

made accessible which will not help the biodiversity- disturbance by dogs, people, litter, bicycles etc.

Point 9 – less than substantial harm to the INCA – the rationale for this should be set out.

Point 12 Multi modal travel interchange hub sounds like a huge car park with an intermittent bus service – it will be difficult to meet this aspiration – see next point.

Points 12, 13, 14 & 18 re traffic and public transport are highly optimistic. They do not sound like long term solutions – the frequency of dedicated bus services tends to be reduced over time as has happened from Quedgeley Waterwells to Gloucester and becomes less attractive to use. However we understand the County Council has to produce a Bus Service Improvement Plan by October.

Name or Organisation: CPRE Gloucestershire – Berkeley Vale District

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

Paragraph	3.3.6-13	Policy	CP4, CP5,CP6, CP8, CP9,HC1, CP14,DES2	Policies Map	PS24
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Cam North West - The map PS24 is inaccurate as it does not show the land already built over to the west of Box Road or the solar array behind it.

The Development of this site has to be considered in conjunction with the proposed development of 'Wisloe' PS37 as access facilities like Cam and Dursley station will be shared.

The sites of PS24 and PS37 will be visible from local high points including Cam Long Down, Frocester Hill and Stinchcombe Hill along the Cotswold Way on the escarpment. The combined effect will be urbanisation of the countryside spilling out into the Vale from the escarpment along the Dursley valley.

If these sites are allowed, there must be significant clumps of tree planting within both sites in addition to the boundary tree belts already proposed to break up the roofs.

Given the discovery of a Roman villa in a new development along Box Road, there should be a thorough archaeological investigation of this site before any work is started.

3.3.10 Impact on RAMSAR/SAC/SPA site. North Cam is surprisingly close to this sensitive site and its surrounding grazing fields. Natural England should be consulted about the impact of recreational activity likely to arise from the development PS24 on this site and also on the Severn Way.

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If these sites are allowed, there must be significant clumps of tree planting within both sites in addition to the boundary tree belts already proposed to break up the roofs.

3.3.9 Cam Neighbourhood Design Code. 900 houses is a large number, they should not look as though they have come straight out of the developer's catalogue like Quedgeley. It would be good if SDC saw this as an architectural challenge to produce well designed, well constructed housing which people will still want to live in by 2100. Given the current demand for gardens, houses should have gardens and space should be made for allotments. Green permeability throughout the site is important so that any remaining wildlife can forage.

The 30% affordable housing quota must be maintained, with rooms large enough to allow home working. Again durable building quality is needed. It is ecologically and sustainably unsound to build poor quality housing which will need to be demolished and rebuilt within 25 years.

3.3.13 Access to Cam and Dursley station needs serious attention now, even before this proposed development is built. The approach road (Box Road) is too narrow and the parking inadequate. Possible adjacent sites for parking have already been built over. The station platforms are too short and the frequency and length of trains at peak times are inadequate.

Improvements to the Cam and Dursley Rail Station require National funding outside the control of SDC as are improvements to the A38 and the M5 junctions. National funding commitment and start date for these improvements should be obtained before any permission is granted for this site.

Good rail access is a key contributor to the sustainability of this site.

It may be advisable to enhance/develop circular routes for footpaths towards Coaley and Stinchcombe to encourage people away from the Severn Estuary protected sites.

Strategic Site Allocation Policy list:

2. The primary school and Early Years provision should be constructed and opened during the first stage of construction to facilitate the development of 'community'.
4. Where is the site of the sports hall and leisure facilities? This is quoted in PS25 as well.
10. Swindon has developed a sandwich layout of road, grass, cycle track, grass, walk/push chair path to encourage walking and cycling to major facilities. This is a large enough development to apply the same pattern and should reduce car use.

Streets within the development must be wide enough to allow on street parking

Name or Organisation: CPRE Gloucestershire – Berkeley Vale District

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

Paragraph	3.3.15 – Summary Point 6	Policy	CP4, CP5, CP6, CP8, CP9, HC1, CP14, DES2	Policies Map	PS25
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4. Do you consider the Local Plan is :

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

Please tick as appropriate

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

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

East of River Cam - The limitations of Cam and Dursley Station as set out in PS24 apply equally and national funding commitment and start date is required to make this a sustainable development.

The 30% affordable housing quota must be maintained, with rooms large enough to allow home working. Again durable building quality is needed. It is ecologically and sustainably unsound to build poor quality housing which will need to be demolished and rebuilt within 25 years.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound.

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

3.3.15 Tree planting within the site to soften the impact of buildings when viewed from above in addition to the proposed buffer zones of trees is necessary.

Summary Point 3 - Where is the site of the sports hall and leisure facilities? This is quoted in PS24 as well.

Summary Point 6 - Cam Neighbourhood Design Code. 180 dwellings should not look as though they have come straight out of the developer's catalogue like Quedgeley. It would be good if SDC saw this as an architectural challenge to produce well designed, well built housing which people will still want to live in by 2100. Given the current demand for gardens, houses should have gardens and space should be made for allotments. Green permeability throughout the site is important so that any remaining wildlife can forage.

Name or Organisation: CPRE Gloucestershire – Berkeley Vale District

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

3.5.10, Q4.1	Policy	CP4, ES4, ES6,EI10	Policies Map	PS34
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4. Do you consider the Local Plan is :

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

Please tick as appropriate

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

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

Sharpness Docks

3.5.10/11 Protection of the Severn Estuary SAC/SPA/Ramsar site must be totally complied with, agreed with Natural England and compliant with all the regulations of the HRA.

Q.4.1 The Port of Sharpness has a licence to store up to 15,000 tonnes of Ammonium Nitrate. The blast zone for this is 600m. Health and Safety Executive are reviewing the criteria for storage after the huge explosion in Beirut of 2,700 tonnes. This should be taken into account when considering all developments in the surrounding area.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with

CPRE Gloucestershire Response to Stroud District Local Plan

the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

3.5.12 Water management – management of flooding, surface water, waste water & sewage infrastructure, and safe access and egress to the site are essential.

Increased capacity for management of waste water and sewage should be agreed with a start date before the development plans begin. Funding for this is out of the control of SDC.

Sharpness has had land allocated for employment for over 30 years. Very little of this has been taken up.

The route of the Severn Way should not be relocated and footpaths through the site should be retained

Name or Organisation: CPRE Gloucestershire – Berkeley Vale District

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

Paragraph	3.5.16-26	Policy	CP3, CP4, CP5, CP14, ES1, EI14, EI12	Policies Map	PS36 Phase 1
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4. Do you consider the Local Plan is :

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

Please tick as appropriate

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

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

3.5.18 – Sharpness Newtown: 2,400 houses in Stage 1 rising to 5,000 in Stage 2. In the Local Plan SDC has safeguarded a large site at Whaddon for Gloucester. The Whaddon site has poor communications with the city, and we understand that Gloucester’s housing requirement may be met through other sites. If SDC retained a smaller site at Whaddon, it would not be necessary to develop as much of this environmentally sensitive, green field site so close to the Severn RAMSAR protection zone.

It should be remembered that The Port of Sharpness has a licence to store up to 15,000 tonnes of Ammonium Nitrate. The blast zone for this is 600m. Health

and Safety Executive are reviewing the criteria for storage after the huge explosion in Beirut of 2,700 tonnes. This should be taken into account when considering all developments, including this one, in the surrounding area.

3.5.22 – NPPF 174, 175 - Severn Estuary SAC/SPA/Ramsar. It is essential that this proposed development does not impact the internationally important Severn Estuary SAC/SPA/Ramsar area. It is already under pressure from people living near and visiting the site, including those walking the Severn Way and using the Canal. Additional development in the Severn Vale included in this Local Plan will add to the pressure. There must be consultation with Natural England to ensure that the requirements of the Conservation of Habitats and Species Regulations (2017) are fully met. The consultation by Footprint Ecology includes the statement that the HRA asserts that "further work is needed to establish the extent and nature of the impacts, and their combined effects on the site, and then what avoidance and mitigation may be possible, and how they can be justified and supported by evidence". We appreciate that SDC has set out proposals to minimise impact, but with any development these are invariably the minimum requirement rather than the necessary requirement. If the HRA requirements cannot be met the development should not be allowed.

Without major investment commitment by national infrastructure and the developers this development is not viable.

3.5.26 - This requires cooperation with many organisations outside SDC. Does SDC have the funds, motivation and capacity to do this?

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

3.5.16 - Design as a Garden Community – the aspirations set out in 'Land South and East of Newtown' are commendable but SDC does not have enough funds or expertise to fight large developers of the sections of the site who will inevitably want to trim the conditions which would make this a 'garden' village. Their standard practise is to apply to reduce the percentage of affordable housing, and the quality of design and build, pleading high costs while increasing the density and open market element of dwellings. A 'garden community' is unrealistic and previous experience of 'garden' developments supports this. The maintenance of the 'garden' element will be transferred to the residents in the form of leasehold/maintenance charges, and the initial cost of these will be sold on to investment companies who will then increase the annual maintenance charges to generate more income making it impossible for original purchasers to sell their properties. This is not a sound basis for development. The provision of SANG in perpetuity will apply to the open spaces by the river liable to flood but not to the green spaces within the development which will fall to the inhabitants.

This is good, productive agricultural land which should be producing food to reduce the nation's dependence on imported food.

3.5.17 - The Sharpness railway branch line is in a very poor state of repair only able to take light, slow freight trains. It has no signalling. For the line to be of any use to a development of this size requires major investment in its structural state, new bridges across the A38 and M5 and a 4km extension to Cam and Dursley station on the main Bristol Gloucester line. Cam and Dursley station will need longer platforms and an increased frequency of longer trains at travel to work times to cope with increased passenger numbers from this development and others from the Cam and Dursley area and Great Oldbury. This level of investment requires pre-agreed Government/Network Rail commitment with a completion date before the agreement of any development at this site. Any bus service for commuters from Sharpness to Cam and Dursley station will also require the improvement of Cam and Dursley station and greater frequency of longer trains at peak travel times.

The junction between the B4066 and the A38 is inadequate. Without a frequent functioning train or bus service people will drive via the A38 to the M5 Junctions 14 and 13 for Bristol and Cheltenham causing overload on the main roads. The A38 is the alternative route every time there is a problem on the M5 with long traffic hold ups.

Sharpness, being on the way to nowhere except Sharpness, has never been an attractive place for commercial development, viz the large undeveloped site allocated in 2015, still undeveloped. Commercial development on this new site is likely to suffer from the same difficulties.

The provision of schools, medical services, shops and recreation facilities must be constructed at the beginning of the development, not halfway through. A development of this size must have the facilities to enable inhabitants to meet and develop a sense of neighbourhood community rather than just living in a dormitory town. Easy access to places of worship in Newtown and Sharpness should be included.

The total proposed site will be 5 times the size of neighbouring Berkeley and the scope for large retail development such as supermarkets is likely to impact adversely the commercial centre of Berkeley.

3.5.21 - It is hoped that SDC will insist that any developer does not use their standard catalogue of house designs and they, or SDC, will commission high quality architect designed buildings appropriate for a garden village built in materials sympathetic to the district which will still be pleasing in 100 years' time. Ecologically it is better to build for the long term initially, rather than structures with a 20 year life.

Care must taken to ensure that waste water from building activity will not contaminate the ditches and river – it is very damaging to the shore line ecosystems.

3.5.23 - Global warming is likely to increase the occurrence of storms with increased tidal range and rainfall. Flood dispersal and wastewater and sewage infrastructure will be important as raw sewage must not reach the river or the sites of proposed housing.

3.5.24/5 and 3.5.17 (above) - It is highly desirable that we all walk, cycle and use the bus. The surgery, pharmacy, school and supermarket must be within easy reach once the first batch of completed houses are marketed, not 500 houses later. However, local employment sites are unlikely to be taken up quickly so out commuting by car will be the norm unless the train/bus service is established and improvements completed to the rail service at Cam and Dursley. The Local Plan is very optimistic about changing people's patterns of travel. Wet weather surgery visits with the elderly or children and shopping with children need a car unless everything is on the doorstep.

Name or Organisation: CPRE Gloucestershire – Berkeley Vale District

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

Paragraph	3.5.27-.36	Policy	CP4, CP5, CP14, ES6, ES1, EI14, EI12, DES2	Policies Map	PS37
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4. Do you consider the Local Plan is :

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

Please tick as appropriate

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

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

Wisloe

3.5.32 NPPF 174, 175 - The site is too near the Severn Estuary SAC/SPA/Ramsar site and Slimbridge WWT. It is less than 2 kilometres as the crow flies, 25 minutes' walk. There is no way that any on site recreation facilities will stop people wanting to go for a good walk towards the river, the Severn Way and the canal path. 1,500 dwellings will house at least 3,000 people. This will put enormous pressure on the site and its surrounding fields. Previous Habitats Regulations Assessments (HRA) have determined that the site is under severe pressure currently and it is important that Natural England is consulted to ensure that the requirements of the Conservation of Habitats and Species Regulations (2017) are fully met.

The site borders the River Cam, part of the Strategic Nature Area. Impact on this has not been assessed. The Environment Agency has spent significant funds on weirs in the River Cam to encourage fish and eel migration.

3.5.27 If the 25% over provision of housing set out in the SDLP was disallowed this Grade 2 green fields development would be unnecessary and could continue to be used for agriculture so we would not need to import 50% of our food (NPPF Para 171).

3.5.27 & 3.5.31 Design as a Garden Community – See reservations expressed in PS36 paragraph 3.5.16. The aspirations set out in 'Land at Wisloe' are commendable but SDC does not have enough funds or expertise to fight any large developer who will inevitably want to trim the conditions, the initial annual rental/maintenance charges will increase exponentially making it impossible for original purchasers to sell their properties. This is not a sound basis for development.

3.5.29 '84 Ha of primarily agricultural land' On the Natural England map this land shows as Grade 2 – Best and Most Versatile – and is incorrectly classified as Grade 3c in the submission. Grade 2 agricultural land is rare within the SDC area. It should be excluded from any development and continue to be farmed productively to feed the nation. (NPPF Para 171)

NPPF Para 170: Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) 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);
- b) 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;

Footnote 53 states "Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality". *This is a key Sustainability Assessment point as the ALC has not been described correctly in the SA & there are reasonable alternatives that have poorer quality land.*

See Page 2 of letter 12 Feb 2021 from Askew Land and Soil Ltd reviewing the Report - Land at the Narles Slimbridge Estate, Wisloe' by Soil Environment Services Limited (SES) on behalf of the Ernest Cook Trust and Gloucestershire

County Council and reported on 13th September 2019 (SES reference SES/ECT&GCC/NSEW/#1). This report is submitted by Wisloe Action Group.

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

Reduce the 25% overprovision of housing in SDLP then this site is not needed.

Other points:

Impact on views of the spire of St John's Church, Slimbridge, Listed Grade 1.

The site is likely to be of considerable archaeological interest as it is adjacent to the Roman Road A38, see also Site PS24. There should be a thorough archaeological survey before committing to the site.

Housing should not be sited over or close to the compressed gas main pipe which crosses the site.

The Strategic Flood Risk Assessment needs revisiting to take account of the sequential test, NPPF Para 157, to assess risk and to include surface water flooding events in Slimbridge and Cambridge within recent years and which also closed the A38 in 2020.

There is no provision for allotments.

Many people from this area commute to Bristol, Gloucester and Cheltenham by car. Local industrial provision is taken up very slowly and with a few exceptions does not employ large numbers of people. It will be difficult to find tenants for 5ha of employment provision.

3.5.34/35 The sustainability of SDS is dependent on public funding to improve railway station capacity and train frequency. Ideally there should be a footpath/cycle connection by bridge over the M5 to the station. There is no space to increase parking provision at the station as it is all built out. This level of development will put more pressure on Junction 14 and the M32 into Bristol and should be assessed in conjunction with current large developments in South Gloucestershire. This can only be addressed by public funding commitment. The walking cycling public transport objective will only work if businesses can be persuaded to relocate to the Cam/Dursley area. We are otherwise building an unsustainable traffic jam.

Name or Organisation: CPRE Gloucestershire – Berkeley Vale District

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

Paragraph	3.7.6	Policy	CP3 CP4, CP5,EI12, DES2,CP13 CP14	Policies Map	PS38
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4. Do you consider the Local Plan is :

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

Please tick as appropriate

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

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

Kingswood South of Wickwar Road

Site unsustainable - This site is currently going through the planning system. It has several serious issues which need addressing, the principal one is the village primary school which is full. There is no space to expand the school and the surrounding local primary schools, including those in Wotton under Edge and out of area are also full. It is not sustainable to develop this site before the school has been relocated within the village and enlarged.

No development should be permitted in Kingswood until Gloucestershire County Council provides a new primary school.

There is significant new and planned development in South Gloucestershire Council between Charfield and the border with Gloucestershire and Stroud District

Council. Kingswood is on the border. This already has increased through traffic in Kingswood and surrounding lanes. There is no evidence of co-operation between SDC and South Gloucestershire Council.

Name or Organisation: CPRE Gloucestershire – Berkeley Vale District

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

Paragraph **3.6.6** Policy **CP14, HC1** Policies Map **PS44**

4. Do you consider the Local Plan is :

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

Please tick as appropriate

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

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

Frampton-on-Severn

3.6.6. Not compliant – it is a green field site with a major power lines over it.

We understand that a brown field site, Oatfield Farm Barns (next to the playing fields), will be submitted very shortly.

A brown field site with no power lines which maintains the current distance between the village of Frampton-on-Severn and the hamlet of Oatfield is a more sustainable site.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound.

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

3.6.6 Develop the brownfield site rather than the PS44 Green Field site

Name or Organisation: CPRE Gloucestershire – Berkeley Vale District

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

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

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

Please tick as appropriate

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

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

Whitminster

3.6.8 Great care will be needed to protect the view of this site from the Industrial Heritage Conservation Area (IHCA)

If S.21/0465/FUL is allowed (3m high rotating solar arrays) adjacent to this site planting will also be needed on the NW side of the site to screen it.

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

Plant more hedges along the North West side as well as the South side overlooking the IHCA

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

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

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

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

YES

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

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

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

We would be able to provide more detail than is set out above.

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

