



Slimbridge Parish Council

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Dear Sirs,

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

Slimbridge Parish as a whole

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

Merging of villages

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

Tiers

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

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

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

Land usage

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

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

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

“protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan”. Building on good agricultural land would mean a loss of potential economic resources of growing food and also that of local jobs for local people.

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

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

Traffic and roads infrastructure

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

Sewerage infrastructure

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

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

Noise and intrusion

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

Amendment of parish boundaries


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

Visual impact

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

Alternative sites

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


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