

## **Matter 5 New settlements at Sharpness and Wisloe**

### ***Issue 5 – Are the proposed new settlement allocations at Sharpness and Wisloe justified, effective and consistent with national policy?***

#### **Strategic Site Allocation Policy PS36 Sharpness new settlement**

The policy proposes the allocation of land south and east of Newtown and Sharpness for a new mixed use garden community. This includes up to 2,400 dwellings by 2040 and 10ha of employment land. The policy requires a range of strategies and plans to be developed that will require approval by the Council. This includes 25 criteria to be addressed.

1. Does the proposed allocation meet the vision, spatial strategy and strategic objectives set out in the Plan? Does the policy ensure that these objectives will be met?

- 5.1.1 The Sharpness New Settlement strategic site allocation PS36 will make a major contribution to meeting the overall vision for the SDLP, in particular, meeting the District's housing and employment needs to 2040 in a modern and innovative way, establishing a sustainable new settlement to adapt to changing lifestyles and to complement the existing network of market towns, whilst supporting the District in transitioning to become carbon neutral by 2030.
- 5.1.2 The vision for the Berkeley cluster (SDLP, CD1, Page 162) sets out some of the key benefits of developing a new settlement in the locality:
- A step change in services and facilities available in the local area;
  - A mix of uses, design quality and accessible layout within a green setting – following Garden City principles;
  - A truly sustainable pattern of living for new and existing local residents;
  - Improved transport links to elsewhere, including new passenger services on the rail branchline connecting to Gloucester and increased strategic bus/coach services;
  - A boost to local investment, complementing the regeneration of Sharpness Docks, the development of the Gloucestershire Science and Technology Park and supporting the historic role of Berkeley town.
- 5.1.3 The Council's response to Matter 2 sets out how the Council developed a spatial strategy to meet needs through a sustainable pattern of growth using a variety of evidence based assessments backed up by public consultation. The Topic Paper: The Development Strategy (EB4) sets out the process in some detail. In summary, the SDLP includes a hybrid strategy based upon a concentrated growth approach. A dispersed spatial pattern of growth with growth distributed is neither sustainable nor able to meet delivery requirements.
- 5.1.4 In the response to Matter 2 Question 5, the Council explains the benefits of concentrated growth and the process by which the two new settlements were identified and assessed. In assessing sites at the District's main settlements it became clear relatively early on in the process that the SDLP would not be able to meet the quantum of housing and employment needs purely through

development within existing Tier 1 or Tier 2 towns and through sustainable urban extensions. New growth points would be needed to avoid environmental, in particular, landscape harm at the Tier 1 settlements, most of which are constrained by their proximity to the Cotswolds AONB (Stroud, Dursley, Wotton-Under-Edge).

5.1.5 The Sharpness New Settlement, located close to facilities and services at Tier 2 Berkeley and Tier 3a Newtown/Sharpness, will deliver growth requirements in a manner compatible with a concentrated growth approach, whilst supporting the regeneration of the Berkeley/Sharpness area, which has suffered from a loss of employment, services and facilities in recent years and performs poorly against certain indices of deprivation.

5.1.6 In terms of meeting the strategic objectives of the SDLP, the Sharpness New Settlement will:

- Deliver a significant quantum of the District's affordable housing and market housing needs, provide a full range of social, leisure and recreation opportunities together with education opportunities through the delivery of a new secondary school, to meet Strategic Objective SO1: Accessible communities;
- Provide for a mix of uses, within an accessible layout prioritising active travel, with access to a significant new green infrastructure resource which will support the delivery of healthy, inclusive and safe communities set out in Strategic Objective SO1a;
- Deliver a sizeable business park to support local employment and bring back wider employment opportunities to an area which has seen decline since the closure of the Berkeley Power Station, complementing other regeneration projects in the area, thus supporting Strategic Objective SO2: Local economy and jobs;
- Supporting the vitality of Berkeley town centre, by bringing new residents and businesses to the Berkeley Cluster area, and by providing improved local walking and cycling links with the town, in support of Strategic Objectives SO3: Town centres and rural hinterlands;
- Bringing forward a new settlement with a degree of internalisation, meeting local needs without the need to travel, and by embracing new technologies and approaches to support active travel and public transport measures, including through the reintroduction of passenger services onto the Sharpness branchline and support for existing and new bus and coach services. These will deliver a step change in transportation measures for the local area, in support of Strategic Objective SO4: Transport and travel.

5.1.7 Strategic Site Allocation Policy PS36 includes an extensive list of requirements for the proposed development, set out in 25 criteria, to support the delivery of the vision, spatial strategy and strategic objectives of the SDLP.

2. Does the evidence adequately demonstrate that the proposal will accord with the sustainable ethos of garden communities?

- 5.2.1 The Council considers that Sharpness New Settlement will deliver the Garden City principles set out on page 31 of the SDLP. Many of these principles are reflected in the SDLP Strategic Objectives, and the answer above sets out how Sharpness New Settlement will deliver broadly against these.
- 5.2.2 An expectation of garden communities is that they become exemplars: delivering new thinking and best practice, with development of the highest design and construction standards. Sharpness New Settlement is proposed to be such a development, with a progressive approach to uses, layout and design to deliver, amongst other things, zero carbon energy generation, a significant net gain to local biodiversity, a significant network of green infrastructure, and a layout which prioritises walking and cycling and access to public transport over the use of the private car.
- 5.2.3 There are two further matters where new settlements alone can deliver against these principles.
- 5.2.4 The first is scale. Garden communities are strategic, larger-scale new developments of 1500 or more dwellings. They should be of sufficient scale to incorporate a range of homes, employment opportunities, green space and other community uses, thereby enabling residents to meet the majority of their daily needs in the local area and reducing the need to commute elsewhere.
- 5.2.5 The vision for Sharpness New Settlement is to deliver a scale of growth required to start to develop the holistic components of a settlement required to provide for local needs on-site and thereby support change to lifestyles and movement patterns, to achieve a level of self-containment and internalisation. Whilst the SDLP does not propose 5,000 homes to be delivered by 2040, the vision is to do so by 2050 and the promoters have the experience and track record of doing so elsewhere.
- 5.2.6 The second matter is a commitment to facilitate community ownership of land and long-term stewardship of assets for the benefit of the local community. This requires robust governance structures to be put in place to ensure the community has a say in the establishment and development of the new neighbourhoods and a long term stake in them.
- 5.2.7 The requirement in Policy PS36 for the development of Sharpness New Settlement to be planned for through a range of tools including a community engagement and stewardship strategy, design codes and a spatial masterplan and implementation plan, are there to ensure that processes are put in place at an early stage to ensure this long term community stewardship of the settlement is delivered.
- 5.2.8 The promoters intend to create a Stakeholder Reference Group (SRG) to encourage full engagement and active debate amongst stakeholders from across the existing communities about the form that Sharpness New Settlement should take. By doing so, they aim to use the balanced opinions of its stakeholders to inform a Developers Handbook and future planning applications. The Developers

Handbook will be an important tool which will provide the essential guidelines that developers will follow in the creation of this sustainable place. The Group will have an established membership and regular meetings, and the chairmanship will be given to an independent professional, outside of the promoters' design team in order to create impartiality and to deliver on the sustainable ethos of the proposal. The role of the SRG will be to generally exceed the Garden Communities criterion on community engagement and to provide a tailor-made experience for residents and community groups in the locality to positively shape and create a genuinely sustainable community for Stroud's future. The promoters will work collaboratively with the SRG to ensure the programme of activities engages people effectively in the communities that members represent.

3. Is the policy aim, of providing a new self-contained garden community settlement, viable and realistic? Has this been robustly demonstrated and is the development, as envisaged in the Plan, likely to be achieved during the plan period?

- 5.3.1 In relation to the strategic allocation sites, including Sharpness New Settlement, the Council's high level 2022 Viability Assessment Refresh (EB111) identifies Sharpness New Settlement as performing better than the other strategic allocations in terms of residual value v benchmark land value (Tables 10.2e and 10.2f) and policy requirements (Appendix 15). The assessment notes that the delivery of any large site is challenging, so it is recommended that the Council continues to engage with the sites' promoters in line with the advice set out in the Harman Guidance and the PPG.
- 5.3.2 The promoters state that they have spent a considerable amount of time looking at the viability and deliverability of the proposals and have provided to the Examination a viability report that assesses the cost, timing and delivery of the ingredients in the development and concludes that the site can be successfully delivered whilst also providing important policy requirements including enhanced environmental standards depending on the ultimate form that they take. Multiple factors which include finance rate, profit, phasing, build cost and the addition of the employment space, will collectively and significantly improve the viability of PS36 when assessed in a more commercial and market facing manner that reflects site appropriate assumptions to demonstrate the deliverability of the scheme. The viability appraisal takes account of the wider geographical housing market area to reflect the aspirational character of living in a garden community. Therefore, if approached with commercial consideration, combined with the policy requirements, PS36 will deliver a viable new community. Further, wider consideration of the proposed Phase 2 of PS36 which would follow to provide significant additional housing for the next plan period will further ensure viability.
- 5.3.3 Added to the viability appraisal, the developer has also provided a phasing plan through the SoCG for the development primarily to show that the development can be provided in the plan period but equally to demonstrate that it will be practical and realistic to have the delivery of the community facilities, employment and infrastructure in the early phases of the development to ensure the sustainability of the development.

4. In relation to infrastructure:

- a. Does the policy clearly identify what infrastructure is necessary to support the delivery of the allocation? Will it be delivered at the right time and in the right place? How will this be achieved?

5.4.1 Strategic Site Allocation Policy PS36 includes within it 25 criteria which will need to be satisfied in order to achieve a successful development. The criteria have been put together having regard to a range of evidence based studies, many based upon infrastructure needs identified in the Infrastructure Delivery Plan (IDP) (EB69 and EB110). The IDP has involved collaborative discussions with infrastructure providers and site promoters, with requirements identified by sector and by strategic site. There is a clear signpost to addressing identified constraints and recommendations referred to in the IDP in criterion 24 of the policy.

5.4.2 The phasing of infrastructure delivery will be addressed through an implementation plan which forms part of the policy requirement. Detailed delivery will be a matter for a future planning application, and discussions with the promoters regarding the way that planning conditions and obligations may be structured. However, the phasing evidence provided by the site promoter already considers the way that infrastructure will be provided over time in a way which is both deliverable and viable.

- b. Has the impact of the new settlement on the surrounding road network, including nearby motorway junctions, been adequately assessed? Can any impacts be mitigated and if so, how and when? Is this feasible? Is the policy sufficiently positively worded in this regard, for example with reference to M5 junction 14.

5.4.3 The transport infrastructure requirements for the site have been identified through the Sustainable Transport Strategy (STS) (EB60a-c and EB108) and the Traffic Forecasting Report (TFR) (EB61 and EB108) which form part of the evidence base for the SDLP. The Council has developed a robust SATURN area based model for the SDLP which has been built and populated with the agreement of National Highways (NH), Gloucestershire County Council (GCC) and South Gloucestershire Council (SGC). The TFR details the modelling assumptions made to account for housing and employment growth up to 2040, including from neighbouring authorities. This has been carried out in line with DfT TAG Guidance and in agreement with NH and GCC. It is therefore considered the best available methodology to ensure that traffic growth from development is accounted for. The Council's response to Matter 11b provides further details.

5.4.4 The TFR and STS demonstrate that the likely impacts on the highway network can be adequately mitigated. Criteria 23 refers to requiring necessary improvements to the existing highway network and supporting text para. 3.5.25 refers to the TFR with reference to necessary highway improvements, including at Alkington Lane. However, it is acknowledged that more explicit references to the highway mitigation packages set out in the Funding and Delivery Plan,

including the A38 and M5 Junction 14, could be added to the Policy PS36, through appropriate modifications, if required.

5.4.5 The site promoters have undertaken a more detailed series of assessments of the potential impacts of the scheme on the local transport network – considering both the local network, the public transport network and the highway network. This work has been based on both the intended outcome (with a significant reliance on local travel and active and public transport modes), but has also tested a more traditional assessment base (a “Fall back” case) on the local highway network to identify that, even if the sustainable travel provision was not be implemented or adopted as forecast, then the development could still be accommodated on this basis with highway mitigation deliverable within the highway boundary.

5.4.6 The need for specific measures for individual schemes, and their timing, will be determined through the development management process.

- c. The policy refers to a new railway station being delivered on the Sharpness branch line as part of the development.
  - i. What is the status of this project and is the delivery of the site allocation dependent on this coming forward?
  - ii. What level and frequency of rail service is proposed and is this supported by Network Rail and relevant service providers?
  - iii. Has funding been identified to support the delivery of this scheme?
  - iv. What are the proposed timescales for its delivery and would it be in time to support the new settlement?
- d. Is the proposed new rail link (on the Bristol-Birmingham mainline) and express coach services deliverable and viable and have funding sources been identified for these schemes? What is the timetable for delivery for these projects and will they be delivered in time to support the allocation? The policy refers to the coach link being required at an early stage in the development, is this viable? Have discussions taken place with the relevant infrastructure providers taken place (such as Network Rail) and do they support the projects? Has funding been identified? Has capacity been identified on the Bristol-Birmingham mainline to accommodate additional passenger traffic?

5.4.7 The current branch line is something of a stranded asset – it is used once each week by a DRS nuclear flask freight train but, is otherwise unused. It therefore has the potential to be returned to passenger use at very little expense, and without the challenges of many rail intensification schemes, that have a range of knock-on or consequential effects that are hard to manage. In this case, the track is there, and is fully operational, and the timetable study has made clear that services could be accommodated on the wider network.

- 5.4.8 The scheme was submitted by the Council to the Restoring your Railway Fund bid process in the latter half of 2020 and in early 2021, but the proposal was already being developed by the promoters at that stage as part of the overall scheme. The bid included an outline case submission and a technical note (EB95). The proposal did not receive a funding award from the RyR bid process, primarily because it did not meet the particular criteria set. The status of the project is that it remains a proposal to reinstate passenger rail services as part of the Sharpness Vale proposals. That is not to say that other public funds would not be sought in the future to seek to secure the services and the station and other infrastructure improvements that may be necessary, but the reinstatement proposals are not dependent on these to ensure their delivery. The viability evidence submitted by the site promoters [CD5d, 932) makes clear that the capital cost of the scheme can be funded by the development if necessary.
- 5.4.9 The site promoters' proposals are that the train service would be available, offering one train per hour between Sharpness and Gloucester, via Cam & Dursley, from the 1200th occupation at Sharpness. The timetable study undertaken, included in section 3.2 of the Sharpness Branch Line – Outline Business Case, Restore Your Railway document, showed that this was feasible, and is the foundation of the proposals. The site promoters' have subsequently updated this work. The initial hourly rail service has been tested against the latest available timetable and has been shown to be deliverable without impact on other services. Network Rail has confirmed that the timetable study undertaken for the Sharpness Branch line passenger service is appropriate for the current development stage and is both sound and valid. On-going dialogue with the Vale of Berkeley Railway Trust (VoBR) has resulted in an SoCG with the site promoters, that sets out how the two parties will work together, and, indeed, that the services each plans to operate are complementary in ensuring the future of the infrastructure.
- 5.4.10 Prior to the rail service being delivered the promoters' transport strategy for the development allows for bespoke coach services to operate to Gloucester from an early occupation level at Sharpness, so travellers will be able to utilise this service, and establish a sustainable travel culture for their journeys, in advance of the train being available. A detailed cost model and forecast of potential patronage for the coach services to Gloucester and Bristol has been developed by the promoters, allowing for services to commence from the 50<sup>th</sup> occupation, and also showing how the service would be funded over time. Income is derived from the farebox, from the service and management charges for the development and from an element of the subscriptions to the MaaS service.
- e. The Sustainable Transport Strategy (STS) lists a number of interventions for the site that will need to be incorporated into its design and layout and be delivered at an early stage. For instance, it identifies that sustainable transport movements should be prioritised over vehicle movements by providing high-quality and accessible cycling and walking routes, which connect to Quedgeley West Business Park and local community facilities on Green Lane. Are these requirements and the timing of their delivery sufficiently clear from the wording of the

policy? Will sufficient suitable and available sustainable transport links connect the site with the surrounding area?

5.4.11 The recommendations from the STS have been incorporated into the criteria for Strategic Site Allocation Policy PS36 and supporting text para. 3.5.24 refers to the interventions set out in the STS. The need for specific measures for individual schemes, and their timing, will be determined through the development management process. The promoters' strategic transport approach to Sharpness Vale is to provide a range of car alternative options to enable sustainable transport and movements within the development site and wider functional transport area and beyond to key destinations for employment and other uses. The internal movement system of the site prioritises high quality active mobility routes supplemented by road based public transport routes which are designed to converge at a strategic mobility hub located at the planned Sharpness Rail Station on the Sharpness Branch Line.

5. Has the effect of the development on the existing Sharpness Waste Water Treatment Works been adequately assessed? Will capacity improvement be required and if so, how will this be delivered and funded?

5.5.1 The Infrastructure Delivery Plan (IDP) (EB69) identifies that an appraisal is required to better understand the potential impact that the new settlement at Sharpness (PS36) will have on the Treatment Works, as proposed growth triples the existing flows. The promoters have engaged with Wessex Waters' Planning Liaison team to advise them of the details of the development so that they can start to review their network and treatment capacity. The existing Treatment Works has current available headroom for the predicted foul flows from between 800-1000 dwellings within the catchment. Wessex Water do not believe this headroom will be eroded during the next five years. Going forward, it will be necessary to keep Wessex Water abreast of the total quantum of development, as well as the anticipated build rate so that Wessex Water can update their modelling and revisit their future capital expenditure programme.

6. The text accompanying the policy acknowledges the site is near to areas subject to flooding and that the disposal of surface water flooding will need careful consideration to ensure that neither the development or adjoining areas are at risk of flooding or exacerbating existing areas of flooding. How will this be achieved?

5.6.1 The policy refers to the management of surface water and that development will seek opportunities to reduce the overall flood risk in the area, improve flood storage capacity and enhance biodiversity through the layout, use and form of the development. The development is therefore required to have a comprehensive surface water management strategy that will be designed in accordance with national and local planning policy/design standards. Work undertaken to date on the scheme has included designing a conceptual surface water management strategy based on the sizing of strategic SuDS features serving each development parcel, therefore confirming that there is sufficient



space for water within the masterplan. A formal surface water drainage strategy will help to manage overland runoff/surface water flooding and ensure flowpaths are managed throughout the site and runoff rates do not exceed current greenfield rates, therefore not causing a detrimental impact in surface water flood risk to the development or offsite. Furthermore, the SuDS features will be integrated throughout the development as part of the green infrastructure strategy.

7. Does the policy sufficiently ensure that the risk to existing flood risk management assets (due to climate change, rising sea levels and natural deterioration) will be addressed?

- 5.7.1 Since 2016 a range of meetings have taken place with Natural England, Footprint Ecology and the Environment Agency (West Midlands and Wessex Area teams) to discuss issues around potential development allocation at Sharpness and any potential impacts on the natural environment. Some of these meetings were specifically with the Sharpness site promoters and their agents to discuss specific impacts and proposed mitigation. There were a range of interrelated matters such as visitor pressure, flood defence, drainage, coastal squeeze and wildlife interests discussed.
- 5.7.2 The Council has subsequently agreed a SoCG with the Environment Agency, which is set out in the Duty to Cooperate Statement (EB3). The SoCG acknowledges that none of the changes required to the Level 2 SFRA “call into question any of the site allocations in the PSD; neither do we consider the changes necessitate any alteration to policy wording in the PSD.” (Pre-Submission Document). The District Council welcomes that the EA have “no objections to the Plan in relation to the Sharpness New Settlement allocation.”
- 5.7.3 Extensive hydraulic modelling work has been undertaken by the promoters to date of the on-site watercourses (fluvial flooding) and coastal flooding, with full consideration of potential future impacts of climate change on hydrological inflows and rising sea levels. The potential future events have been mapped and all built development is located outside of the tidal and fluvial extreme event floodplains (apart from the proposed battery facility site). There will be no loss of floodplain as a result of the development proposals.
- 5.7.4 In terms of existing flood risk management assets, there is an existing Environment Agency flood defence earth embankment along the bank of the Severn. The Shoreline Management Plan does not identify the need for any specific flood defence policy along the section of estuary adjacent to the allocation and coastal erosion does not pose a risk to the site (as demonstrated by the hydraulic modelling). The management policy to the north and south of the site is to ‘Hold the Line’ and the development of the site will not have any detrimental impact on the existing flood defences. The allocation, therefore, presents an opportunity to secure and create significant areas of complimentary wetland habitats without the need for the realignment of the flood defences.

8. The policy refers to the development having ultrafast broadband to homes and businesses with top average speeds of 1Gbps. As this requirement would be delivered by a third party (Open Reach) and would be outside the control of the developers, is it justified and effective?

5.8.1 Criterion 14 of the policy has been included to facilitate modern sustainable living and working practices in line with Garden Community principles. The Government's Garden Communities prospectus does expect credible proposals to demonstrate that consideration has been given to 'infrastructure requirements' which includes high speed broadband, amongst other things. As with other infrastructure requirements, communities will also now expect that they will have access to high-speed broadband. The policy criterion is therefore justified in seeking this service with such a large new community to ensure that the developer can demonstrate the provision of such a facility within the emerging design of the development.

5.8.2 The promoter has already been in discussions with 'Virgin Media/O2' who have confirmed that they are in a position to offer Gigabit connectivity for the whole site and its residents with top speeds of 1Gbps.

9. Has the potential of canal towpath degradation due to increased usage by future occupants of the development been considered? How would this issue be mitigated and addressed if necessary?

5.9.1 The development of the site will have no direct impact upon the canal towpath as it is located away from the canal, but it is recognised that increased usage is likely given the scale of development. Criterion 16 requires contributions towards the enhancement of off-site walking and cycling routes linking to the national cycle and canal networks and it is expected that a contribution will be made towards the canal towpath within this context.

5.9.2 Development of the site is considered to provide a notable opportunity to enhance the provision and connectivity of PRoWs across the site and with the wider surrounding landscape for a variety of users. These have been designed into the masterplan, in consultation with key stakeholders including the Council, Natural England and the Local Access Forum, to ensure that it is deliverable to the highest standards. Additional, more detailed mitigation and enhancement measures will be detailed as part of any planning application.

10. The text accompanying the policy lists a number of mitigation measures required due to the proximity of the site to the Severn Estuary SAC/SPA/Ramsar site. Taking account of these measures, will there be an effect on the developable area of the site that could impact on site densities or overall quantum of development?

5.10.1 The mitigation measures required to avoid adverse effects on the Severn Estuary SAC/SPA/Ramsar site, which are described in Policy PS36 and the accompanying text, have been integrated into the concept designs prepared by

the promoters and these are reflected on the Site Map for PS36. These measures have been identified through consultation between the Council, the promoters and Natural England and are described in detail within the Proposed Recreation Avoidance Strategy submitted on behalf of the promoter as part of the Regulation 19 representations (CD5d, 932).

5.10.2 The promoter's representations confirm that the necessary measures have been integrated into the feasibility and design process from the outset. Thus, the overall quantum of development that is proposed in the next plan period (c. 2,400 dwellings by 2040) takes all necessary land uses into account, including a multi-functional Green Infrastructure network which can deliver the planned avoidance/mitigation measures in relation to the Severn Estuary SAC/SPA/Ramsar site, without impacting adversely on the developable area.

11. Has full consideration been given to the impact of the proposal on other factors including the loss of agricultural land and local landscape and is this clearly set out in the evidence base supporting the Plan?

5.11.1 The Council undertook a high level assessment of the primary and secondary constraints affecting the Sharpness site (Area 52) as part of the Assessment of Strategic Development Opportunities in Parts of Gloucestershire (EB17a and Appendix 2b (EB1717d)). This included agricultural land and landscape sensitivity to a range of settlement sizes, as well as a number of other environmental considerations. The SALA consideration of the Sharpness site also included the results of heritage, ecological and landscape assessments (EB19c, Site NEW002). The Council's Sustainability Appraisal has assessed the site in terms of a range of sustainability appraisal objectives in both policy-off and policy-on scenarios (CD3b, Appendix 7, pp.780).

5.11.2 In terms of soil quality, document EB17a identified the vast majority of the assessment area is comprised of grade 3 agricultural land. The promoters have subsequently surveyed the site in 2021 and overlaid the results with the draft masterplan which indicates that 1.8ha of Grade 2 land will be lost, 78.5ha of 3a, 6.3ha of 3b, 0.6ha Grade 4 and 0.5 ha of 'other land'.

5.11.3 In terms of local landscape sensitivity, document EB17a identified the broader area as having moderate landscape sensitivity to accommodate a small village (1,500-5,000 dwellings). The SALA, reporting the results of the Landscape Sensitivity Report (EB36b) identified land to the east of the railway line at Newtown/Sharpness as having medium sensitivity to housing but did not survey the area to the west beyond a small parcel identified as high sensitivity. The SLA concluded that development would need to be considered as part of a wider development strategy for the area for it to have a coherent relationship with existing settlements.

12. Are the indicative site areas, appropriate uses, net developable areas, minimum densities and indicative site capacities justified and effective?

- 5.12.1 As part of the Statement of Common Ground between the Council and the promoter, a revised plan has been submitted showing some additional areas to be added to the site allocation boundaries (Phase 1), most notably southwest of Wanswell (moved from Phase 2 to Phase 1) and northwest of Berkeley (moved from Phase 2 to Phase 1 and additional land).
- 5.12.2 The site has been promoted through the SDLP on the basis that the site could accommodate “approximately 2,400 dwellings”. It is noted, however, that the site promoter considers that there is potential to deliver 2,750 homes within the Plan period. They have therefore suggested the figure could be modified to “at least 2,400 dwellings by 2040” and “approximately 5,000, subject to Local Plan Review”.
- 5.12.3 The SoCG includes with it a phasing and delivery spreadsheet which sets out the areas of each of the proposed land parcels for development. The residential parcels are proposed at an average gross density of approximately 37 to 40 dwellings per hectare. It should be noted that this density does not include the strategic green infrastructure and nature reserve which are provided outside of these land parcels. The Council notes that 2,400 dwellings could be accommodated at a slightly lower density.
- 5.12.4 The secondary school is important to the site and the surrounding local communities; it has been centrally located to promote active travel. Gloucestershire County Council provided size requirements in 2019 and the strategy adopted by the promoter is to provide one 3FE Primary School with early years, expand the existing Sharpness Primary School to 2FE and to reserve a site for a Secondary School. The secondary school size has been based on Leckhampton High School in Cheltenham which is one of the newest Secondary Schools built by GCC with a capacity of 900 pupils. A 6FE or 7FE school provided in Phase 1 would substantially exceed the educational needs generated by 2,750 homes but would allow for future development growth for approximately 5,000 homes.
- 5.12.5 Community facilities are an essential part of a new place and a good basis for building communities. The development proposes a mixed-use hub positioned around the new railway station and at the nodal point of the radial walking & cycling routes and alongside the Strategic Mobility / Interchange hub, allowing journeys to be made by means other than the private car. This mixed-use area will provide local facilities for the community including retail, healthcare, convenience store, takeaways, energy centre and other local facilities allowing the development to deliver a balanced mix of uses and a full range of community facilities. The areas proposed are based on other sites that have been delivered and take account of known constraints.
- 5.12.6 The development has been designed in consultation with Natural England which has given confidence that the new SANG and Nature Reserve areas are appropriate. Open space will be provided in accordance with Policy DHC7 standards. The GI network will make up approximately 50% of the entire site area and allow for new habitat creation and a Biodiversity Net Gain of at least 10% together with the provision of valuable Ecosystem Services including tree

planting and wetland creation to achieve significant carbon capture and enhanced management of water resources.

5.12.7 Fluvial and tidal modelling has been undertaken to confirm floodplain extents, depths, velocities and the potential impacts of climate change enabling the promoter to determine the developable area and understand the use and design of the proposed SANG and Nature Reserve.

13. How has the amount of employment land been determined and is this sufficient to ensure the site limits the need to travel and is self-sustaining? Are there job growth estimates and are these realistic?

5.13.1 Utilising data held with the Office of National Statistics and Stroud District Council's Employment Land Review, the promoter has calculated that the settlement will comprise approximately 2,496 residents that will need to travel to work. A 10-hectare business park, utilising the HCA Employment Densities Guide, could provide job opportunities for between 32% and 43% (depending on employment use) of the projected active working population with a need to travel to work. By providing a minimum of 782 jobs, Sharpness provides a significant opportunity to outperform other areas within the district in terms of internalised trips by providing ample opportunity for people to work and live in the same settlement.

5.13.2 The Employment Land Review (EB30, page 6) states that "Industrial activity in Sharpness is focused around Severn Distribution Park for B/B8 units of 3,000-5,000 sqm. Evidence is Sharpness is well connected to the M5 Corridor area. Gloucester Science and Technology Park (GSTP) has grown to become a key centre for start-ups/micro businesses in technology sectors and has scope to expand across the rest of the decommissioned Berkeley Nuclear Facility." In addition, the recent STEP bid has demonstrated the potential for low carbon energy projects at Berkeley and a recent visit by Rolls Royce has indicated their active interest in the Severn Edge site (Berkeley and Oldbury) to deliver small modular reactors (SMRs) which could bring 800 jobs+ to the Berkeley site by the early 2030s.

5.13.3 Although the ELR does recommend the promoters provide more evidence about deliverability at Sharpness, the study does state "While the Sharpness area mostly serves a budget market at present, it was felt there is scope for growth, particularly if part of a wider new settlement proposal. The area is accessible and could be a focus for demand, albeit secondary to the M5 Corridor." (EB30, para. 4.64).

14. How will phasing be used to ensure that employment land and local services and facilities, such as schools, are developed and completed in parallel with housing land completions?

5.14.1 The phasing of employment and infrastructure delivery will be a matter for a future planning application, and discussions with the promoter and stakeholders regarding the way that planning conditions and obligations may be structured.

Criterion 25 of Policy PS36 requires phasing arrangements to be put in place to secure the timely delivery of employment and community facilities.

- 5.14.2 The Council has previously agreed a phasing plan relating to employment land with the promoters of the existing strategic allocation West of Stonehouse (SA2) in the current adopted Local Plan. This involved two mechanisms by which an initial employment parcel was, firstly, brought forward as serviced land prior to the release of a subsequent housing parcel and then, secondly, a further phase of housing was released only once the employment parcel had been developed out. The Council intends to work with the promoter to agree such a mechanism at this strategic site.
- 5.14.3 In relation to the wider delivery and phasing of infrastructure, the evidence provided by the site promoter already considers the way that infrastructure will be provided over time. This is identified by the phasing plans attached to the SoCG agreed with the promoter and this has been factored into the preparation of the trajectory.

15. Is the site boundary as shown on the policies map accurate?

- 5.15.1 As the draft site allocation has evolved over time, a number of land parcels have been added or removed. The Policies Map currently shows a previous redline version of the draft allocation but the promoter has informed the Council that the Policies Map needs to be updated.
- 5.15.2 As part of the Statement of Common Ground between the Council and the promoter, a revised plan has been submitted showing some additional areas to be added to the site allocation boundaries (Phase 1), most notably southwest of Wanswell (moved from Phase 2 to Phase 1) and northwest of Berkeley (moved from Phase 2 to Phase 1 and additional land).

16. General site layout / masterplanning questions:

a. Will the site be delivered in accordance with active design policies?

- 5.16.1 The Strategic Site Allocation Policy PS36 sets out within its criteria the key elements of the 10 principles of Active Design which will be required of the development. In particular, walkable communities, connected walking and cycling routes, high quality streets and spaces and a network of multi-functional green space. The underpinning design principles for the development puts walking and cycling at the top of the movement hierarchy and follows the NPPF to "provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking" (NPPF, para. 106d) and TCPA's Garden City Principles of "Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport". (SDLP, page 31). The development will be connected via a web of multifunctional green corridors that will permeate throughout the development allowing people to be close to personal transport routes (including safe walking and cycling/scooting infrastructure) and this will further define the edge of these

neighbourhoods as well as provide walking / cycling / scooting route networks which will provide connections to public transport, employment, leisure, a strategic Mobility/Interchange Hub at the new rail station, amenity and health facilities. The development therefore achieves the principles listed by TCPA and Sustrans for creating a 20min neighbourhood where journeys are made on foot through a 20-minute walk or could be cycled in around 7 minutes. The development will make active travel as practical as possible to meet the daily needs of residents for work, shopping, education and leisure.

- b. How will landscaping and layout address any visual impacts from the site's development?

5.16.2 Due to its scale and nature the allocation site will be subject to the EIA regulations and require a full Landscape and Visual Impact Assessment (LVIA) as a chapter of the Environmental Statement. The visual assessment will be undertaken in accordance with the up-to-date methodology set out within the current Guidelines for Landscape and Visual Impact Assessment and supporting Landscape Institute Technical notes. The LVIA process will identify areas where phasing and advanced mitigation measures may be beneficial to the reduction of visual effects. Mitigation measures identified within LVIA will also be subject to long term landscape and Ecological Management Plan LEMP to ensure its successful establishment. It is considered that through a comprehensive GI network and careful siting of development, both housing and employment uses can be successfully assimilated into the receiving landscape.

- c. A comprehensive green infrastructure network is referred to in the text accompanying the policy. How will the policy ensure that this is designed and delivered as part of any future development proposal? How will this infrastructure be funded?

5.16.3 A parameter Green Infrastructure plan will provide the mechanism to secure the strategic green framework. A series of workshops with the relevant stakeholders will aid the determination of the key principles of GI and open space typology. 'Design Code Principles' will form part of the outline application, identifying the fundamental principles and aspirations of the applicant, Council and other stakeholders. Additional green infrastructure such village greens, informal open space, ditches, swales and ponds will also be delivered within the areas developed at reserved matters and subject to an approved Neighbourhood Design Code. This will refine the detail and character set out within the 'Design Code Principles'.

- d. Design codes are referred to in order to ensure development is zero carbon and responds to the local context, specifically landscape and heritage elements. How and when will these design codes be brought forward? What will their status be?

5.16.4 The Design Codes will be split into two main planning stages, the first stage Design Code will be an overarching 'Neighbourhood Character Design Guide' and be submitted with the Outline Planning Application, most likely as part of the Design & Access Statement, this will set the vision for the development including its zero carbon aspirations. The second stage will be a series of Design Codes that relate to separate neighbourhoods and uses, this will follow the outline approval and set guidance for future Reserved Matters Applications. These Design Codes will be tied to the planning approval via a planning condition that will require them to be agreed before any Reserved Matters Application is determined. They are split into separate Design Codes for different neighbourhoods so they can be more site specific and offer more detailed design parameters than producing one Design Code for the whole site.

17. Is the policy approach to the application of local standards for sports provision justified and effective? Should the policy define the required local provision depending on the size of development?

5.17.1 The Council has included requirements for on-site sports provision and contributions to off-site facilities in criterion 8. As Delivery Policy DHC7 sets out comprehensive local open space standards, in terms of quantum and accessibility, by population size, the Council does not consider it necessary to set out detailed site requirements within each site allocation policy.

18. Will the HSE consultation on minimum distance for ammonium nitrate storage at Sharpness Docks impact upon the allocation?

5.18.1 The current HSE consultation distance for ammonium nitrate at Sharpness Docks does not impact materially upon the allocation. The Ammonium Nitrate Assessment (EB95a) concludes that the storage of ammonium nitrate at Sharpness Docks does not constitute any recognised risk to residents of the proposed Sharpness Vale development, particularly as all habitable areas are outside of the HSE's Consultation Distance and Risk Zones.

19. The text accompanying the policy refers to community engagement and stewardship as being key to delivering a new community in line with garden city principles. How will this be achieved?

5.19.1 The requirement in Policy PS36 for the development of Sharpness New Settlement to be planned for through a range of tools including a community engagement and stewardship strategy, design codes and a spatial masterplan and implementation plan, are there to ensure that processes are put in place at an early stage to ensure this long term community stewardship of the settlement is delivered.

5.19.2 The promoters intend to create a Stakeholder Reference Group (SRG) to encourage full engagement and active debate amongst stakeholders from across the existing communities about the form that Sharpness New Settlement should take. By doing so, they aim to use the balanced opinions of its stakeholders to



inform a Developers Handbook and future planning applications. The Developers Handbook will be an important tool which will provide the essential guidelines that developers will follow in the creation of this sustainable place. The Group will have an established membership and regular meetings, and the chairmanship will be given to an independent professional, outside of the promoters' design team in order to create impartiality and to deliver on the sustainable ethos of the proposal. The role of the SRG will be to generally exceed the Garden Communities criterion on community engagement and to provide a tailor-made experience for residents and community groups in the locality to positively shape and create a genuinely sustainable community for Stroud's future. The promoters will work collaboratively with the SRG to ensure the programme of activities engages people effectively in the communities that members represent.

20. Are there any barriers to the site coming forward as anticipated by the housing trajectory? Are delivery assumptions realistic?

5.20.1 The Council has received an expected delivery trajectory from the site promoters. The promoters have stated that, given the extensive work that has already been undertaken by the Sharpness Vale development team, it is considered that there are no known barriers to the development and successful delivery of this site or the anticipated trajectory.

Strategic Site Allocation Policy PS37 Wisloe new settlement (within the Berkeley Cluster)

The policy proposes the allocation of land at Wisloe for a new mixed use garden community, including approximately 1,500 new dwellings and 5ha of employment land. The policy requires a range of strategies and plans to be developed that will require approval by the Council. The policy lists 24 elements to be addressed.

21. Does the proposed allocation meet the vision, spatial strategy and strategic objectives set out in the Plan? Does the policy ensure that these objectives will be met?

5.21.1 The Wisloe New Settlement strategic site allocation PS37 will make a major contribution to meeting the overall vision for the SDLP, in particular, meeting the District's housing and employment needs to 2040 in a modern and innovative way, establishing a sustainable new settlement to adapt to changing lifestyles and to complement the existing network of market towns, whilst supporting the District in transitioning to become carbon neutral by 2030.

5.21.2 The vision for the Berkeley cluster (SDLP, CD1, Page 162) sets out some of the key benefits of developing a new settlement in the locality:

- A step change in services and facilities available in the local area;
- A mix of uses, design quality and accessible layout within a green setting – following Garden City principles;
- A truly sustainable pattern of living for new and existing local residents;
- Improved transport links to elsewhere, including enhancing access to Cam & Dursley rail station and by increasing strategic bus services along the A38 corridor;
- Established communities will have the chance to help shape their neighbourhoods, maintaining their distinct identities and protecting and improving those aspects of the area.

5.21.3 The Council's response to Matter 2 sets out how the Council developed a spatial strategy to meet needs through a sustainable pattern of growth using a variety of evidence based assessments backed up by public consultation. The Topic Paper: The Development Strategy (EB4) sets out the process in some detail. In summary, the SDLP includes a hybrid strategy based upon a concentrated growth approach. A dispersed spatial pattern of growth with growth distributed is neither sustainable nor able to meet delivery requirements.

5.21.4 In the response to Matter 2 Question 5, the Council explains the benefits of concentrated growth and the process by which the two new settlements were identified and assessed. In assessing sites at the District's main settlements it became clear relatively early on in the process that the SDLP would not be able to meet the quantum of housing and employment needs purely through development within existing Tier 1 or Tier 2 towns and through sustainable urban extensions. New growth points would be needed to avoid environmental, in

particular, landscape harm at the Tier 1 settlements, most of which are constrained by their proximity to the Cotswolds AONB (Stroud, Dursley, Wotton-Under-Edge).

5.21.5 The Wisloe New Settlement, located close to Tier 1 Cam and Dursley settlements, will deliver growth requirements in a manner compatible with a concentrated growth approach, whilst delivering services and facilities which will enhance the range available to the nearby smaller settlements of Slimbridge and Cambridge and improve access of the local population to a range of enhanced public transport services.

5.21.6 In terms of meeting the strategic objectives of the SDLP, the Wisloe New Settlement will:

- Deliver a significant quantum of the District's affordable housing and market housing needs, provide a full range of social, educational, leisure and recreation opportunities, to meet Strategic Objective SO1: Accessible communities;
- Provide for a mix of uses, within an accessible layout prioritising active travel, with access to a significant new green infrastructure resource which will support the delivery of healthy, inclusive and safe communities set out in Strategic Objective SO1a;
- Deliver local employment to the area, thus supporting Strategic Objective SO2: Local economy and jobs;
- Supporting the vitality of Cam district and Dursley town centres, by bringing new residents and businesses to the area, and by providing improved local walking and cycling links with the existing settlements, in support of Strategic Objectives SO3: Town centres and rural hinterlands;
- Bringing forward a new settlement with a degree of internalisation, meeting local needs without the need to travel, and by supporting active travel and public transport, including through measures to extend the Cam and Dursley Greenway towards the Sustrans NCR 41 at Slimbridge and by the provision of a new bridge across the M5, significantly improving access from the new settlement and the wider area to Cam & Dursley station. These will deliver a step change in transportation measures for the local area, in support of Strategic Objective SO4: Transport and travel.

5.21.7 Strategic Site Allocation Policy PS37 includes an extensive list of requirements for the proposed development, set out in 24 criteria, to support the delivery of the vision, spatial strategy and strategic objectives of the SDLP.

22. Does the evidence adequately demonstrate that the proposal will accord with the sustainable ethos of garden communities? Is the site of sufficient scale for the delivery of the garden city principles to be feasible? Has this been robustly demonstrated and is the development, as envisaged in the Plan, likely to be achieved during the plan period?

- 5.22.1 The Council considers that Wisloe New Settlement will deliver the Garden City principles set out on page 31 of the SDLP. Many of these principles are reflected in the SDLP Strategic Objectives, and the answer above sets out how Wisloe New Settlement will deliver broadly against these.
- 5.22.2 An expectation of garden communities is that they become exemplars: delivering new thinking and best practice, with development of the highest design and construction standards. Wisloe New Settlement is proposed to be such a development, with a progressive approach to uses, layout and design to deliver, amongst other things, zero carbon energy generation, a significant net gain to local biodiversity, a significant network of green infrastructure, and a layout which prioritises walking and cycling and access to public transport over the use of the private car.
- 5.22.3 There are two further matters where new settlements alone can deliver against these principles.
- 5.22.4 The first is scale. Garden communities are strategic, larger-scale new developments of 1500 or more dwellings. They should be of sufficient scale to incorporate a range of homes, employment opportunities, green space and other community uses, thereby enabling residents to meet the majority of their daily needs in the local area and reducing the need to commute elsewhere.
- 5.22.5 The vision for Wisloe New Settlement is to deliver a scale of growth required to start to develop the holistic components of a settlement required to provide for local needs on-site and thereby support change to lifestyles and movement patterns, to achieve a level of self-containment and internalisation. The Council recognises, however, that Wisloe is at the lower limit of a Garden Community as defined by Government, and therefore it is important that necessary trips to services and facilities outside of the site are sustainable. Wisloe, because of its unique location adjacent to a mainline station, close to a strategic bus corridor on the A38/A4135 and with the potential to link up active travel routes into Cam and Dursley and with neighbouring villages, has the potential to facilitate a high number of trips by healthy and sustainable forms of transport.
- 5.22.6 The second matter is a commitment to facilitate community ownership of land and long-term stewardship of assets for the benefit of the local community. This requires robust governance structures to be put in place to ensure the community has a say in the establishment and development of the new neighbourhoods and a long term stake in them.
- 5.22.7 The requirement in Policy PS37 for the development of Wisloe New Settlement to be planned for through a range of tools including a community engagement and stewardship strategy, design codes and a spatial masterplan and implementation plan, are there to ensure that processes are put in place at an early stage to ensure this long term community stewardship of the settlement is delivered.
- 5.22.8 The promoters have demonstrated, through the development of a Draft Masterplan (CD5d, 955), and through more recent work to develop a Draft Design Code, including a stewardship strategy (due to launch shortly on the site promoters' website [www.Wisloe.co.uk](http://www.Wisloe.co.uk) ) their commitment to facilitate a

development according to the ethos of garden communities. A summary of how the proposed community will achieve the Garden City Principles identified in the SDLP is set out in Appendix C of the masterplan report. The masterplan has been developed through an Iterative Design Process including stakeholder and community engagement, Design Review and technical studies which are set out as appendices to the masterplan.

- 5.22.9 The phasing strategy set out in the masterplan report demonstrates how the 1,500 homes and facilities will be delivered during the Local Plan period (2021-2040).
- 5.22.10 In relation to the strategic allocation sites, including Wisloe New Settlement, the Council's high level 2022 Viability Assessment Refresh (EB111) identifies Wisloe New Settlement as performing better than other strategic allocations in terms of residual value v benchmark land value (Tables 10.2e and 10.2f) and policy requirements (Appendix 15). The assessment notes that the delivery of any large site is challenging, so it is recommended that the Council continues to engage with the sites' promoters in line with the advice set out in the Harman Guidance and the PPG.
- 5.22.11 Savills, working for the site promoters, have reviewed this analysis and provided responses to the Local Plan Viability Testing, including CIL Review, and Local Plan Viability Assessment 2022 Refresh.
23. Will the proposed new settlement be suitably connected to sustainable transport infrastructure networks to ensure that future residents are able to access an essential range of services, facilities and employment opportunities?
- 5.23.1 Wisloe will provide an excellent range of facilities and infrastructure which will allow for enhanced connectivity for new residents and people within existing neighbouring communities. The recommendations from the Sustainable Transport Strategy (STS) (EB60a-c and EB108) have been incorporated into the criteria for Strategic Site Allocation Policy PS37 and supporting text para. 3.5.34-3.5.35 refer to the interventions set out in the STS.
- 5.23.2 The Draft Masterplan and Design Codes describe how the mix of uses proposed within the new neighbourhood centres will ensure that new residents can meet the majority of their day to day needs without the need for vehicular travel to the wider area. The neighbouring communities of Slimbridge and Cambridge will also benefit from the access to key local facilities and improved access to sustainable transport infrastructure.
- 5.23.3 Strategic pedestrian, cycle and bus links are integral to the proposed layout of the site, and there will be opportunities for community-led facilities at the heart of the new neighbourhood. The site's proximity to strategic travel corridors will ensure it is well connected with surrounding settlements and facilities, with access to public transport being made a desirable option for travel and focus on walking and cycling links to the station being intrinsic to the framework of the masterplan.

- 5.23.4 The proposed pedestrian and cycle bridge across the M5 provides a key link for the new community and existing residents of Slimbridge and Cambridge to access Cam & Dursley Station and facilities at Cam and Dursley to the south of the M5. The bridge and new settlement will also extend the Cam and Dursley Greenway towards the Sustrans NCR 41 at Slimbridge and will also provide benefits to the wider area, including the opportunity for Slimbridge Wildfowl and Wetland Trust to benefit from cycle connectivity to the railway station. The masterplan integrates sustainable transport including walkable neighbourhoods, integrated and connected cycle infrastructure, mobility hubs and an integrated bus network. Consideration of future sustainable transport modes (including automatic vehicles) has been integrated into the masterplan.
- 5.23.5 In terms of improving access to Cam & Dursley station, there are also wider rail service frequency improvements proposed through the MetroWest Phase 2 scheme. This will deliver 30-minute services to Bristol via Yate and Gloucester. It is understood that MetroWest services are likely to commence from May 2023, subject to WECA funding confirmation at the end of January 2023. This would mean service frequency improvements would be in place from first occupation at Wisloe.

24. In relation to infrastructure:

- a. Will infrastructure to support the allocations be delivered at the right time and in the right place?

- 5.24.1 Strategic Site Allocation Policy PS37 includes within it 24 criteria which will need to be satisfied in order to achieve a successful development. The criteria have been put together having regard to a range of evidence based studies, many based upon infrastructure needs identified in the Infrastructure Delivery Plan (IDP) (EB69 and EB110). The IDP has involved collaborative discussions with infrastructure providers and site promoters, with requirements identified by sector and by strategic site. There is a clear signpost to addressing identified constraints and recommendations referred to in the IDP in criterion 23 of the policy.
- 5.24.2 At a site level, the site lends itself well to the phased delivery of infrastructure, with the ability to service early parcels of residential development land with relative ease from existing highways, removing the requirement to deliver significant on site infrastructure to unlock residential parcels. Furthermore, the topography of the site and scheme design lend themselves well to providing spoil from the construction of a bund running along the eastern boundary, the delivery of which will commence from an early stage of the development timeline. The purpose of the bund is twofold, as a sound barrier and a platform providing footings for the construction of the bridge over the M5.
- 5.24.3 The phasing of infrastructure delivery will be addressed through an implementation plan which forms part of the policy requirement. Detailed delivery will be a matter for a future planning application, and discussions with the promoters regarding the way that planning conditions and obligations may be structured. However, the phasing evidence provided by the site promoter (Draft

Masterplan Section 5) already considers the way that infrastructure will be provided over time in a way which is both deliverable and viable.

- b. Are the proposed rail link to the north and the express coach service to the south viable and deliverable? Have funding sources been identified? Will they be delivered on time to support the new settlement? Have discussions taken place with the relevant infrastructure providers and do they support the projects?

5.24.4 This question appears to be a mistake as Wisloe is not proposing a rail link to the north.

- c. Has the impact of the new settlement on the surrounding road network, including nearby motorway junctions, been adequately assessed? Can any impacts be mitigated and if so, how? Is the policy sufficiently positively worded in this regard, for example with reference to M5 junction 14.

5.24.5 The transport infrastructure requirements for the site have been identified through the Sustainable Transport Strategy (STS) (EB60a-c and EB108) and the Traffic Forecasting Report (TFR) (EB61 and EB108) which form part of the evidence base for the SDLP. The Council has developed a robust SATURN area based model for the SDLP which has been built and populated with the agreement of National Highways (NH), Gloucestershire County Council (GCC) and South Gloucestershire Council (SGC). The TFR details the modelling assumptions made to account for housing and employment growth up to 2040, including from neighbouring authorities. This has been carried out in line with DfT TAG Guidance and in agreement with NH and GCC. It is therefore considered the best available methodology to ensure that traffic growth from development is accounted for. The Council's response to Matter 11b provides further details.

5.24.6 The TFR and STS demonstrate that the likely impacts on the highway network can be adequately mitigated. Criteria 22 refers to requiring necessary improvements to the existing highway network and supporting text para. 3.5.35 refers to the TFR with reference to access from the A38 and potentially from A4135 with necessary highway improvements. However, it is acknowledged that more explicit references to the highway mitigation packages set out in the Funding and Delivery Plan, including the A38 and M5 Junction 14, could be added to the Policy PS37, through appropriate modifications, if required.

5.24.7 In relation to the Wisloe allocation, infrastructure to encourage sustainable travel can be front loaded, thus meaning that occupants have access to both active travel, bus and rail travel options enabling sustainable journeys for short and long journeys. This being in place from first occupation can help ensure that positive behaviours are created from the outset and ensuring the allocation is as sustainable as possible. Detailed proposals will still need to demonstrate their site-specific impacts upon the highway networks when they progress through the planning application process, but the positive policy position prioritising active

travel and public transport has the potential to reduce any local site-specific impacts from the allocation on both the local and strategic highway network.

- d. Will the location of the high pressure gas pipeline that runs through the site constrain the proposed development in anyway? What effect, if any, will the presence of the gas pipeline have on the viability of developing the site?

5.24.8 Options for the retention or diversion of the gas pipeline were considered during the development of the masterplan for Wisloe, supported by work by Stantec and Fingleton White/WWU (included in Additional Documents to Masterplan report).

5.24.9 The promoters propose to divert the gas main within a thick-walled steel pipe to the eastern edge of the proposed developable area (within the Green Infrastructure to the development boundaries). The Delivery Strategy (set out in the Masterplan report) sets out the proposed programme for diversion of the gas main early in the development process to remove constraints on the delivery of the masterplan and reduce risks of impacts on the construction process to a minimum. A cost estimate has been obtained which falls within an acceptable allowance for infrastructure costs for a scheme of this scale. Due to the timescales involved in bringing this proposed development to realisation, the cost of this diversion will need to be revised as the scheme is developed.

- e. Has the effect of the proposed new settlement on the Sharpness Waste Water Treatment Works been adequately assessed? If capacity improvements are necessary can they be delivered within existing environmental constraints and how will they be funded?

5.24.10 The IDP (EB69, Table 63) identifies that Severn Trent Water has advised that Wisloe should be connected to the adjacent Coaley Sewage Treatment Works and have identified this as a low risk option. Due to the size of the proposed site at Wisloe, it is important for Severn Trent to be kept updated with any progression in design, changes to land use/units or its withdrawal, in order to appropriately account for growth in the region.

- 25. Is the site boundary as shown on the proposals map accurate and is it justified?

5.25.1 Strategic Site Allocation PS37 has been written to ensure a comprehensive and cohesive development is achieved across the site. The site boundary includes land which has been put forward by landowners for development. The Masterplan and Design Code demonstrate that the allocation (1,500 home garden community with associated uses) can be delivered within The Ernest Cook Trust's and Gloucestershire County Council's land within the proposed allocation boundary. The masterplan has also been designed to incorporate the



other, smaller, land parcels within the allocation, allowing for integrated access to these where this is required.

26. Are the indicative site areas, appropriate uses, net developable areas, minimum densities and indicative site capacities justified and effective?

- 5.26.1 The draft masterplan demonstrates that the allocation for a 1,500 home garden community and 5 hectares of employment space is achievable on land wholly within the allocation and owned by the Ernest Cook Trust and Gloucestershire County Council.
- 5.26.2 The draft masterplan demonstrates how the proposed 1,500 homes (and mixed-use local centre) will be delivered within approximately 28 hectares of the 76 hectare site in accordance with Garden City Principles. The masterplan provides 28 hectares of Green Infrastructure (GI), along with 6.8 hectares for education, sports and amenity areas and 8 hectares of infrastructure (roads, sustainable transport routes etc).
- 5.26.3 Higher density development is proposed within the neighbourhood centres and at key locations within the development to support facilities and sustainable transport provision. Lower density areas to the edges of the development are integrated with the landscape framework of the site. The net density of the housing element of the masterplan is approximately 50 dwellings per hectare (20 dpHa gross) and allows for appropriate levels of parking and gardens. The promoter states that the draft Design Code will demonstrate that the approach to block and plot design will deliver these densities in accordance with the masterplan and garden community principles.

27. Will any impacts on the nearby Severn Estuary SPA/SAC Ramsar Site and SSI be adequately mitigated?

- 5.27.1 The Council's Habitats Regulation Assessment (EB85) has assessed all strategic allocations for impacts on protected habitats. This site is only identified as having recreation impacts as a result of the cumulative level of growth within the Plan within 7.7km of the Severn Estuary. The HRA states that existing strategic approaches to address recreation impacts are in place for the Severn Estuary SAC/SPA/Ramsar which provide an established means to address the cumulative impacts from recreation and are cross-referenced within the Plan. Once updated the mitigation strategies are likely to enable the Council to be confident that adverse effects on integrity, alone or in combination, can be ruled out for the Severn Estuary SAC/SPA/Ramsar.
- 5.27.2 The Council is in the process of updating the strategy and Policy 37 refers at criterion 5 to the potential for mitigation to include off-site measures if appropriate. However, the extensive Green Infrastructure of almost 30 hectares planned for the site provides opportunities for on-site mitigation measures.

28. In relation to general site layout / masterplanning:

a. Will the site be delivered in accordance with active design policies?

5.28.1 The Strategic Site Allocation Policy PS37 sets out within its criteria the key elements of the 10 principles of Active Design which will be required of the development. In particular, walkable communities, connected walking and cycling routes, high quality streets and spaces and a network of multi-functional green space. The underpinning design principles for the development puts walking and cycling at the top of the movement hierarchy and follows the NPPF to "provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking" (NPPF, para. 106d) and TCPA's Garden City Principles of "Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport". (SDLP, page 31).

5.28.2 The draft masterplan has been developed in accordance with active design principles. The masterplan is focused around two new walkable neighbourhoods with mixed use centres within the northern and southern areas of the site with direct walking and cycling connections from the surrounding residential neighbourhoods. Strategic sustainable, active transport connections are proposed between the site and the existing villages of Cambridge and Slimbridge - facilitating improved links from the existing communities and Cam & Dursley Station and the surrounding area.

5.28.3 The primary centre, Wisloe Village, will provide a mix of uses around a new village square, including a new school, nursery, potential farm shop and community hub, community open space, workshops and workspaces, small shops, offices and cafés, and residential properties. This new centre will be within 10-15 minutes walking distance of the whole development, and existing properties in Slimbridge and Cambridge.

5.28.4 A secondary neighbourhood at Lighten Brook is primarily residential, but will also provide a mix of uses, with potential to include some small workspaces and Later Living accommodation, set around a green space with play and other facilities.

5.28.5 The Movement and Access Parameter Plan in the Design Code shows the proposed location of the principal pedestrian/cycle routes and highway connections. The movement and access principles for the site have been developed with close reference to existing and emerging local planning and transport policy, including the Council's Sustainable Transport Strategy.

b. If key landscape corridors are to be retained and kept free from development, will there be sufficient scope within the site to deliver 1500 dwellings at an appropriate density?

5.28.6 The draft masterplan demonstrates how the proposed 1,500 homes (and mixed-use local centre) will be delivered within approximately 28 hectares of the 76 hectare site in accordance with Garden City Principles. The masterplan also provides 28 hectares of multi-functional green and blue infrastructure which will

provide high-quality public spaces, generate net biodiversity gains and wider ecosystem services, connect with the wider landscape and provide climate change mitigation/adaptation. The GI network in the draft masterplan has been designed in accordance with Building for Nature standards.

5.28.7 To maximise the efficient use of land, the GI incorporates the diverted gas main, noise bund to the M5 and an integrated wetlands network that will provide a comprehensive Sustainable Urban Drainage system. This landscape framework is integrated into the masterplan and will include places for food production, play, learning, activity and quiet reflection. It is proposed the stewardship of the green infrastructure network will be retained by the community to ensure long-term benefits for future residents and neighbouring villages.

c. How will landscaping and layout address any visual impacts from the site's development?

5.28.8 Landscape assessment work carried out as part of the Assessment of Strategic Development Opportunities in Part of Gloucestershire (EB17, EB17d) identified that landscape sensitivity in this area is moderate under the small village scenario. However, it is recognised that there are important views and a need to prevent physical and visual coalescence with neighbouring villages.

5.28.9 The site promoters have undertaken more detailed landscape and visual assessment which have informed the development of the draft masterplan. The almost flat and low-lying landform, combined with the visual effect of overlapping layers of hedgerows with hedgerow trees, and areas of small copses in the landscape, effectively limit people's views into the site from locations other than the site boundaries. There are limited locations that enable views of the full area of the site. However, long distance views from the AONB will require proposals to have due regard to height and mass of proposed development. There are also attractive views from within the site to the wider landscape including the Cotswold Escarpment, the spire of St John the Evangelist Church, Slimbridge, and distant views to the Forest of Dean across the Severn Estuary to the west.

5.28.10 The integrated green and blue infrastructure framework builds upon the existing landscape character, providing a framework to the development and breaking up the mass of new built form when seen from the wider landscape and long-distance views. The landscape bund to the M5 will provide a backdrop to the development and screening noise and views of vehicles on the motorway - as well as limiting views from the AONB to the east. The landscaping will also be accessible from the existing communities around Wisloe and provide a buffer and setting to the proposed development to prevent coalescence. In summary, the sensitively designed mixed-use development can be successfully accommodated without causing undue harm to landscape features, landscape character, peoples' views and visual amenity, or long distance views from the Cotswolds AONB.

5.28.11 Due to its scale and nature the allocation site will be subject to the EIA regulations and require a full Landscape and Visual Impact Assessment (LVIA) as a chapter of the Environmental Statement. The visual assessment will be

undertaken in accordance with the up-to-date methodology set out within the current Guidelines for Landscape and Visual Impact Assessment and supporting Landscape Institute Technical notes. The LVIA process will identify areas where phasing and advanced mitigation measures may be beneficial to the reduction of visual effects.

- d. Has sufficient assessment been undertaken of any heritage and / or archaeological factors that may affect the site? For example, comments from Historic England refer to the site containing archaeology from medieval, potentially Roman and prehistoric eras. Does the policy adequately reflect any recommendations from relevant evidence base studies and assessments? Should reference be included in the policy to the need for development to take account of any potentially nationally significant features and the need to conserve them?

5.28.12 A heritage assessment of the site has been carried out for the site promoters by Cotswold Archaeology (EB96). The assessment was informed by key 'desk-based' sources, including the county Historic Environment Record, Historic England Archives data, aerial photographs held by Historic England, Gloucestershire Archives (historic maps and documents) and Gloucestershire Local Studies Library, and LiDAR data (held by the Environment Agency). Inspection of the site was carried out, and also of the wider surroundings in order to inform assessment of the 'setting' of heritage assets in the wider environs.

5.28.13 The heritage assessment has identified a potential for archaeological remains within the site but concludes that they are not anticipated to be of a level of heritage significance that would require preservation in-situ and are thus not anticipated to comprise an over-riding constraint to development. The assessment recommends further archaeological evaluation however, in order to provide further information on the character and value of any such remains. As a part of this process of staged further work, a Method Statement for a geophysical survey of the site has been approved by the Gloucestershire County Council archaeology officer. The heritage assessment also assessed the role of the site with regard to the 'setting' of designated heritage assets in the wider environs. The report concludes that the site does not form a part of the setting of any designated heritage assets that contributes to their significance, and therefore that the 'setting' of designated heritage assets is not anticipated to comprise a significant constraint to residential development of the site.

29. The site lies within a Minerals Safeguarding Area. What steps, if any, will need to be taken prior to any development to ensure that this issue is mitigated? If extraction is required prior to any development taking place will this affect the viability or timescales for developing the site?

5.29.1 A number of allocations in the SDLP are located within Minerals Safeguarding Areas. This is a secondary constraint where the effects upon the mineral resource can generally be mitigated by the extraction of minerals prior to development taking place (if the mineral is economically valuable). Impacts on

MSAs are taken into account within the Sustainability Appraisal (CD3 and appendices) and The Assessment of Strategic Development Opportunities (EB17). Gloucestershire County Council's Minerals Local Plan contains policies to address non-mineral development within an MSA.

5.29.2 The site promoters have recently undertaken a minerals assessment to provide an indication of potential viability of mineral extraction at the site. The assessment indicates that extraction of mineral resources at the site are unlikely to be economically viable due to the limited depth and poor quality of the resources present. Where practicable, underlying mineral that is extracted as part of any cut/fill engineering works will where suitable be used positively within the proposed development replacing any need to import an equivalent volume of primary aggregate. The assessment is currently being reviewed by Gloucestershire County Council.

30. Is the policy approach to the application of local standards for sports provision justified and effective? Should the policy define the required local provision depending on the size of development?

5.30.1 The Council has included requirements for on-site sports provision and contributions to off-site facilities in criterion 6. As Delivery Policy DHC7 sets out comprehensive local open space standards, in terms of quantum and accessibility, by population size, the Council does not consider it necessary to set out detailed site requirements within each site allocation policy.

5.30.2 As well as complying with local standards, the site promoters propose to progress discussions with Slimbridge AFC to consider how the football club could be better integrated within the masterplan, enabling the new development to contribute positively to existing community facilities.

31. Does the policy sufficiently ensure that the risk to existing flood risk management assets (due to climate change, rising sea levels and natural deterioration) will be addressed?

5.31.1 The Council has carried out SFRA Level 2 which considers the impact of climate change on flood risk in the future and contains an assessment of the cumulative impact of development. The Council has agreed a SoCG with the Environment Agency, which is set out in the Duty to Cooperate Statement (EB3). The SoCG acknowledges that none of the changes required to the Level 2 SFRA "call into question any of the site allocations in the PSD; neither do we consider the changes necessitate any alteration to policy wording in the PSD." (Pre-Submission Document). The SFRA 2 identifies that only a minor part of the site is impacted by fluvial flood risk and the IDP recommends that development on the site is sequentially located away from areas of higher flood risk and located within Flood Zone 1.

5.31.2 The site promoters have prepared a flood risk and surface water appraisal for the site (EB96). All proposed development will be outside the Environment Agency's Flood Zones and areas at risk of flooding from all sources i.e. a sequential

approach to flood risk management and development layout will be adopted. Finished floor levels for buildings within the proposed development will be set at least 300mm above the Environment Agency modelled flood level for the 1 in 100 year fluvial (plus allowance for climate change), the 1 in 200 year tidal event (plus allowance for climate change) or 150mm above surrounding ground levels, whichever is higher.

- 5.31.3 It is understood that the primary flood risk downstream of the site is from foul sewer flooding, brought about by groundwater ingress into the foul network. The development will not introduce surface water flows to the foul network.
- 5.31.4 The surface water drainage strategy proposes to limit discharges from the proposed developed in 1 in a 100 year storm event (plus allowance for climate change) to the equivalent present-day QBAR greenfield rate i.e. a 1 in 2.3 year event or the mean annual average runoff rate. This represents a reduced discharge from the site into watercourses (for all events between a 1 in 2.3 year storm event up to the design storm event) when compared to maintaining the undeveloped status quo. This will provide minor downstream flood risk benefit, bearing in mind the context of this site within the wider hydrological catchment in which it sits.
- 5.31.5 In order to manage surface water runoff from site, Sustainable Drainage Systems (SuDS) will be used. These seek to mimic natural drainage processes i.e. reducing surface water flow rates on and off site and provided water quality treatment. They will be designed to integrate with the developments proposals, providing amenity to occupants, and enhance biodiversity.

32. Has the potential of canal towpath degradation due to increased usage by future occupants of the development been considered? How would this issue be mitigated and addressed if necessary?

- 5.32.1 The potential for canal towpath degradation has been considered, mainly in relation to the proposals at Sharpness. Criterion 15 of Policy PS37 recognises that contributions will be required from Wisloe to support safe pedestrian and cycle accessibility between the site and local facilities. The Council would accept a modification to reference contributions to maintain the canal towpath at Shepherds Patch.

33. Reference has been made to footpaths across the site that cross the railway. What is Network Rail's view on this issue? Are there any safety implications that the proposed development would need to take account of? Does the policy need to refer to this?

- 5.33.1 Network Rail has raised concerns relating to the proximity of a number of strategic allocations in the SDLP to public railway crossings. As a result, NR and SDC are completing a Statement of Common Ground which will recommend some modifications to the SDLP examination. This will involve adding a new clause to Policy PS37 requiring "Safety improvements to, or the closure of,

footpath level crossings where development may result in a material increase in usage, in consultation with Network Rail.”

34. Are there any barriers to the site coming forward as anticipated by the housing trajectory? Are delivery assumptions realistic?

5.34.1 The Council and site promoter are confident, based on the scheme design and due diligence undertaken, that there are no barriers to the site coming forward. The promoter’s consultant team has undertaken comprehensive analysis of the site which has involved detailed consideration by LHC from a design perspective, Stantec from a planning and technical perspective, Savills from a marketing and feasibility perspective, and Ward Williams Associates from a cost review perspective. They believe the site will be delivered as anticipated by the realistic housing trajectory set out in the updated Statement of Common Ground.

2020-2025	2026-2030	2031-2035	2036-2040	TOTAL
/	356	524	620	1,500

5.34.2 The housing trajectory estimates delivery of 50 units in year 1 (2026), increasing to 144 dwellings per annum at peak. The anticipated trajectory is within the range typically seen on sites of this scale and nature. The location of the site is deemed by Savills New Homes estate agents to have the fundamental attributes that are necessary to generate strong interest from the housing market. The site is capable of hosting multiple developers selling open market and private rented homes, along with affordable homes, providing several routes to market to support delivery rates.

5.34.3 The site specific geography lends itself well to residential development parcels being presented to the market from an early stage in the delivery programme without the requirement for significant enabling infrastructure as these parcels are located in relatively close proximity to existing infrastructure. Development will be located centrally first (and adjacent to the A38), before spreading south and north, allowing for varying character areas to be built out in unison.

5.34.4 Movements in the national housing market will naturally fluctuate over the course of the development lifecycle, but Savills do not envisage any barriers to the total unit numbers being delivered over the course of the housing trajectory timeline referred to above.

5.34.5 Cost consultant Ward Williams Associates has undertaken a cost review of the scheme. This analysis includes careful consideration of the specific abnormalities arising from the scheme design such as the diversion of a gas main which will be moved to the site perimeter, the inclusion of a pedestrian and cycle bridge over the M5 enhancing transport connectivity, and the delivery of a soil bund running the length of the eastern boundary. These costs are in line with the quantum of

cost typically expected for a feasible scheme of this scale and we therefore are confident that the site will come forward as anticipated by the housing trajectory.

- 5.34.6 Savills is confident that strong interest will be received from development partners once the site's allocation is confirmed. On behalf of the landowners, Savills is undertaking a soft market testing exercise with development partners known to operate at this scale. This process is building on informal expressions of interest already received and will help to inform the formal marketing process which is due to commence later this year. The agreed strategy is to market the opportunity in the first half of 2023, in line with the Local Plan timetable, with a view to incorporating a development partner (or partners) into the project once the Local Plan has been formally adopted. This process will facilitate the delivery assumptions as estimated.