



To: Stroud District Council  
From: Wisloe Action Group (WAG)  
Date: 21<sup>st</sup> January 2020 (Hand Delivered)  
Subject: Wisloe Action Group's (WAG) Response to Stroud District Council's Draft Local Plan Consultation

### **WISLOE ACTION GROUP**

The Wisloe Action Group was formed to help represent our community's views in response to Stroud District Council's Draft Local Plan public consultation process.

Local people are deeply concerned about Stroud District Council's proposals in their draft Local Plan for a so called 'growth point' in the Slimbridge Parish. Stroud District Council and the developers jointly refer to the site as Wisloe Green, a new "Garden Village", which joins Cambridge, Gossington and Slimbridge together with Cam.

WAG (and Parish Council meetings) have been extremely well supported by Slimbridge Residents. A significant proportion of the community have been actively engaged throughout the consultation process and will continue to support WAG after the consultation period to ensure the proposed site is excluded from the Local Plan.

### **WISLOE ACTION GROUP'S POSITION ON THE DRAFT LOCAL PLAN**

- The Wisloe Action Group does not support Stroud District Council's preferred strategy for meeting Stroud District's future growth and development needs.
- There are significant issues and constraints relating to the proposed development within Slimbridge Parish which are outlined in this response and the impact of these cannot be mitigated.
- The proposed Slimbridge Parish development does not meet site assessment criteria and is not a sustainable site.
- Sustainable dispersal was the view of the people and the Draft Local Plan does not reflect this. The proposed Slimbridge site was submitted at a late stage in the process and Stroud District Planners appear to have gone above and beyond to gather evidence to support their view to include the site rather than properly assess the site on its lack of sustainable credentials.

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## SITE SELECTION

The site proposed within Slimbridge Parish (Wisloe) was not in the original 2017 consultation and therefore has not been selected in an evidence-based manner. Stroud District Council (SDC) selected Wisloe as a preferred site only after the Ernest Cook Trust (ECT) along with Gloucester County Council proposed the development. Stroud District Council (SDC), with the support of ECT and GCC then built an evidence base to support their preferences. Residents feedback and preference for dispersal has been ignored as have many of SDC's statements within the 2017 consultation. Proof of this is that many alternative and more suitable sites have been rejected without assessment as they are lower Tier settlements as are both Cambridge (Tier 4) and Slimbridge (Tier 3b). On this basis the proposed Slimbridge site (Wisloe) should either not be considered and all lower Tier Settlements should be reassessed by SDC. Furthermore, this development does not meet many of SDC's own sustainability objectives.

SDC's Sustainability Appraisal Report 2019 has a number of objectives:

*SA 5.2: Does the Plan help to improve the satisfaction of people with their neighbourhoods as places to live and encourage ownership? Villagers in Cambridge, Gossington and Slimbridge are appalled at the prospect of being subsumed into one large development and a number are considering selling up.*

*SA 5.3: Does the Plan safeguard and enhance the identity of the District's existing communities and settlements? The plan will destroy the identity of Cambridge, Gossington and Slimbridge*

*SA 8.1: Does the Plan protect and enhance the District's sensitive and special landscapes (including the Cotswolds AONB), and townscapes? The creation of an extended conurbation from Dursley, through Cam and Wisloe to Slimbridge will create a blot on the landscape for any views across the Severn Vale from the AONBs.*

*SA 8.2: Does the Plan prohibit inappropriate development that will have an adverse effect on the character of the District's countryside and settlements? No it does not, its will destroy the character and existing settlements.*

*SA 8.3: Does the Plan promote the accessibility of the District's countryside in a sustainable and well-managed manner? No. The increase in local traffic around the A4135 and A38 will reduce accessibility.*

*SA 8.4: Does the Plan prevent coalescence between settlements? No. Slimbridge, Cambridge and Gossington will be joined to Cam and therefore Dursley.*

*SA 8.5: Does the Plan protect and enhance the District's natural environment assets (including parks and green spaces, common land, woodland and forest reserves) public realm? No. It destroys Grade 2 agricultural land that provides an open green space between current settlements and the motorway.*

*SA 13.1: Does the Plan encourage the appropriate provision of housing development on previously developed land as opposed to greenfield sites? No. The proposed development is planned to be built on Grade 2 agricultural land.*

*SA 13.5: Does the Plan reduce the loss of soil and high grade agricultural land to development? No. The proposed development is planned to be built on Grade 2 agricultural land.*

The Strategic Assessment of Land Availability (SALA) Methodology February 2016 defines the process for identifying and assessing sites suitable for development.

### **Site submissions**

Section 4.6. states:

*All submissions will require the completion of a Site Submission Form, setting out the key information required, available as a downloadable proforma (Appendix C) on the Council's Consultation Hub during the Call for Sites period. An individual submission is required for each site submitted and will need to be accompanied by a site location plan, on an Ordnance Survey base, clearly identifying the site boundaries and access to the site.*

From the evidence on the SDC website, this process was not followed. The submission for all the Wisloe sites consisted of one e mail from GCC and two maps, one each for the GCC and ECT land.

### **Site assessments**

The three sites that make up the proposed Slimbridge site (Wisloe) have references SLI002(GCC land), SLI004 (ECT land) and SLI005 (ECT land). Each site was assessed individually in 2018 as having future potential.

All three assessments dismissed or did not consider major issues in line with the following SALA principles.

*In addition, the following factors will be considered to assess a site's suitability for development now or in the future:*

- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;*
- potential impacts including the effect upon landscape features, nature and heritage conservation, and impact on the existing transport network (including rail);*
- appropriateness and likely market attractiveness for the type of development proposed;*
- contribution to regeneration priority areas;*
- environmental/ amenity impacts experienced by would be occupiers and neighbours.*

The only references to these factors were that proximity to the M5/A38/A4135/railway may result in noise and visual amenity issues which would require mitigation.

The reality is that there **will be** noise issues which will be difficult to mitigate.

There was no reference to air pollution, impact on landscape, infrastructure, environment.

The three locations should have been assessed as one with full consideration of all the factors and particularly the impact on the landscape and it is subsuming Slimbridge, Cambridge and Gossington into one large site.

No consideration has been given to the further impact of the coalescence with the extension of Cam. The total of over 3000 new houses makes this the largest development in the draft Local Plan.

## **ENVIRONMENTAL - CARBON NEUTRAL 2030 (CN2030)**

The proposed development in the Slimbridge Parish will have a massive impact on the area across the full spectrum of environmental considerations.

The Draft Local Plan was produced in advance of CN2030 and the Proposed site in Slimbridge Parish falls short across numerous policies within CN2030.

### **The Stroud District Green Party state**

*“The current consultation was launched in advance of the District Council declaring a climate emergency and committing itself, alongside other progressive local authorities, to reaching carbon neutrality by 2030. Attaining carbon neutrality by 2030 will have challenging implications for our revised local plan. It will require setting aside sites and policies to encourage significant additional renewable energy generation, including in appropriate locations within the AONB. New houses will need to be future proof and carbon zero, which will also reduce future energy bills and boost our local skills base in low carbon building. Reducing travel and modal shifts in transport will be important, transport needs to have an inbuilt hierarchy, which prioritises those modes of transport with the least greenhouse gas emissions (walking, cycling, buses and trains, as well as enabling the growth of electric vehicles and upcoming new transport technologies). Additional high-quality agricultural land will need to be retained for human food production and other land for carbon sequestration.*

*If well planned all these changes can make our district a cheaper, safer, more attractive, more communal, more biodiverse and resilient place to live.*

*The Green Party objects to the Tory Government imposed demand that land is allocated for 12,800 additional homes by 2031. We believe this figure has been calculated using a flawed methodology and is undeliverable without significant damage to our environment and communities. We believe that if land is allocated within Stroud District to meet the housing needs of Gloucester City, then this number should be deducted from, rather than additional to, the numbers being forced upon Stroud District Council.*

*The Council needs more powers to force developers to build on brownfield sites and smaller, affordable homes. We are aware that the greatest need is and will be for both young people and young families as well as an increasing elderly population.”*

The proposed development will consume high quality agricultural land whilst increasing emissions through higher commute miles and private car usage.

### **SDC Policy CP14 High quality sustainable development states: -**

*High quality development, which protects, conserves and enhances the built and natural environment, will be supported.*

*Development will be supported where it achieves the following:*

- 1. Sustainable construction techniques, including facilities for the recycling of water and waste, measures to minimise energy use and maximise renewable energy production*
- 2. No unacceptable levels of air, noise, water, light or soil pollution or exposure to unacceptable risk from existing or potential sources of pollution. Improvements to soil and water quality will be sought through the remediation of land contamination, the provision of SuDS and the inclusion of measures to help waterbodies to meet good ecological status*
- 3. Adequate water supply, foul drainage and sewage capacity to serve the development and satisfactory provision of other utilities, transport and community infrastructure*
- 4. No increased risk of flooding on or off the site, and inclusion of measures to reduce the causes and impacts of flooding as a consequence of that development*
- 5. An appropriate design and appearance, which is respectful of the surroundings, including the local topography, built environment and heritage*
- 6. Re-use of previously developed land and/or the adaptation of existing buildings that make a positive contribution to the character of the site and surroundings, unless demonstrably unviable*
- 7. No unacceptable adverse effect on the amenities of neighbouring occupants*

8. *Contribute to the retention and enhancement of important landscape & geological features, biodiversity interests (including demonstrating the relationship to green infrastructure on site and wider networks)*
9. *Contribute to a sense of place both in the buildings and spaces themselves and in the way in which they integrate with their surroundings including appropriate landscaping, biodiversity net gain, appropriate open space, sport and amenity space provision*
10. *A design and layout that aims to assist crime prevention and community safety, without compromising other design principles*
11. *Efficiency in terms of land use, achieving higher development densities in locations that are more accessible by public transport and other non-car modes and where higher densities are compatible with the character of the area and the setting of the development*
12. *It is not prejudicial to the development of a larger area in a comprehensive manner*
13. *Safe, convenient and attractive accesses on foot and by cycle and suitable connections with existing footways, bridleway, cycleways, local facilities and public transport*
14. *It is at a location that is near to essential services and good transport links to services by means other than motor car.*

**The proposed site in the Slimbridge Parish falls short on items 2, 3, 4, 5, 7, 8, 11 and, in particular, 14 as the essential services are located in Cam and Dursley and the train station is only really accessible by car, and this facility is at full capacity.**

**Sustainability Appraisal Report for the Stroud Draft Local Plan 65 November 2019 SA10 possess the question**

*SA 10.2: Does the Plan promote more sustainable transport patterns and reduce the need to travel, particularly in areas of high congestion, including public transport, walking and cycling?*

*SA 10.3: Does the Plan promote more sustainable transport patterns in rural areas?*

**With the average commute distance being 17km and essential services being some miles away cycling or walking is not realistic. Public transport continues to be unpopular with only 3% of the population utilising it regularly so the car will remain a necessity not just for commuters but families, shoppers etc.**

**The proposed development In Slimbridge Parish falls significantly short in both areas.**

## **Conclusion**

The proposed development In Slimbridge Parish falls short in so many areas highlighted within CP14 and in particular CN2030 that it is difficult to see how it can conceivably stay within the local plan.

## AGRICULTURAL LAND CLASSIFICATION (ALC)

ECT and GCC commissioned Soil Environment Services Ltd to conduct an agricultural land classification at Narles, Slimbridge Estate, Wisloe in September 2019.

It is not clear why this report was commissioned as the land was already classified as ALC Grades 2 and 3 by the Ministry of Agriculture, Fisheries and Food (MAFF) in 1983 and the south of the site was graded more recently in 1997 (ALCB/87/97 and ALCB/88/97) as Grades 2, 3a, 3b and 4. This is acknowledged in the subject report at paragraph 5.1.

Curiously the findings of the recent report contradict both previous classifications and are also in sharp disagreement with the opinions of the people working the land. Mr. Moss, the current farmer, states:

***“I have farmed land at the proposed Slimbridge site since 2007 in which time I have grown numerous cereal crops. These have included maize (corn) for combining as a grain crop, maize for forage, wheat both first and second wheats and spring barley. Potatoes were also grown prior to my tenancy. We have had volunteer potatoes (from original planting) in our crops for many years. The land is easy to work, grows consistently well above average yields unlike other land we farm in the south of the Slimbridge Estate which is classified as Grade 3”.***

The implication of Mr. Moss’s statement is that this land cannot be considered Grade 3b if above average yields have been consistently achieved.

The finding at paragraph 5.2 is that the land is 98.9% Grade 3b. The only exception is the other 1.1% or 0.8ha of non-agricultural land belonging to the stables. However, the land is broken up into several fields. Some are regularly farmed, as stated by Mr. Moss, and others are merely pasture used for grazing horses and yet the assessment classifies all the land at the same grade. How can that be? How curious!

As far as we are aware, no local people were consulted, indeed no one living adjacent to the site, or tenants working the land or the livery yard, saw anyone conducting the two-day long assessment.

Professional sources at Hartpury College have reviewed the assessment and question the methodology. They made three observations:

1. They suggest we need to ask whether the soil type was hand textured as this method is open to personal interpretation and should nowadays be laser tested for accurate soil type analysis.
2. The fact that there is stone at 55cm means that, with drainage, the soil could be improved to produce higher levels of crop production and therefore raise the potential classification to 2 or 3A. This observation is at odds with the fact that parts of the land are fertilised and yet the assessor found no variation in grading.
3. There should been a soil analysis carried out to identify the soil fertility.

What is most disturbing is that the consultants failed to contact Wales and West Utilities (WWU) with regard to core sampling near the high-pressure gas line which runs diagonally through the site. According to the firm, Soil Environment Services, they were not informed by either ECT or GCC about the presence of a pipeline. It seems most unprofessional not to conduct a full pre-assessment health and safety check and simply rely 'on being told'. Similarly, either ECT or GCC didn't know there was such a potentially dangerous obstruction across the site when they drew up the plans, or they failed to notify the consultant they employed to conduct the assessment. The pipeline is clearly marked across every field and road crossing. An example can be seen in the photograph below. How could a professional assessor spend two days on site and fail to notice or understand the significance of such obvious markings?



How much has this significant restriction on development been taken into account in the plans which are being proposed?

WWU general conditions state the following:

### 13. BUILDING PROXIMITIES

*There are minimum proximity distances for buildings from WWU mains depending on both the operating pressure and the material of the main. Advice should be sought from WWU prior to building works taking place to confirm these distances. For High Pressure pipelines you must seek further guidance from the HSE and Local Authority Planning team regarding their PADHI distances regarding building proximities as these may be in addition to WWU proximity distances for a pipeline.*

*Temporary buildings should not be placed above any gas pipe or within 3.0 metres of mains operating above 75mbar (medium, intermediate and high-pressure mains) during construction activities and in no circumstances should permanent structures be built over any pipe transporting gas.*

WWU have informed us that the erection of permanent buildings is not only forbidden but is also accompanied by an easement which is typically between 6 and 15 metres either side of the pipeline. This will need to be applied diagonally across both parts of the proposed development. Hardly the fluffy image for a 'garden village'.

Aside from a serious health and safety violation, this whole saga is typical of so many areas of this proposal. Rushed, incomplete, incompetent and failing to consider even the most obvious clues to why it is not a viable plan.



We are sure it will have not escaped the potential developers' attention that it would be much more difficult to build on Grade 2 land than on Grade 3b. Indeed, SDC, with its green credentials, would surely not have condoned building on land which is relatively rare in this district and needs to be cherished and protected.

All in all, the findings of the assessment commissioned by the potential developers are dubious to say the least, particularly when considering the publication HM Government (2018): A Green Future: Our 23 Year Plan to Improve the Environment.

*The key area of relevance to the emerging Local Plan Review is:*

*Using and managing land sustainably:*

*Embed a 'net environmental gain' principle for development, including natural capital benefits to improved and water quality.*

*Protect best agricultural land. Improve soil health and restore and protect peatlands.  
Recovering nature and enhancing the beauty of landscapes:*

Given the potential conflict of interest we want a further, independent classification carried out. In order to promote fairness and balance, the company should be independently selected by the Wisloe Action Group and the classification funded by SDC.

## **COALESCENCE**

Slimbridge Parish contains two main villages, these being Slimbridge and Cambridge, plus the hamlets of Gossington, Moorend, Tumpy Green, Kingston, Troy Town and Shepherds Patch. The parish covers approximately 6.5 square miles. A huge concern of the parishioners is losing the identity, charm and individuality of these villages and hamlets.

SDC policy ES7. Paragraph 6.43 notes

*“the principle pressure on the landscape arising from new development is erosion of the separate identity, character and functional amenity of settlements and the setting, and impacts on the open countryside”.*

**The proposed site within Slimbridge parish will have huge impacts on the open countryside and result in the coalescence of Slimbridge, Cambridge, Gossington and indeed the M5 and Cam.**

*The Draft Plan 2019 goes on to state:*

*Core Policy CP15 A quality living and working countryside*

*In order to protect the separate identity of settlements and the quality of the countryside (including its built and natural heritage), proposals outside identified settlement development limits will not be permitted except where these principles are complied with:*

*1. It is essential to the maintenance or enhancement of a sustainable farming or forestry enterprise within the District; and/or 2. It is essential to be located there in order to promote public enjoyment of the countryside and support the rural economy through employment, sport, leisure and tourism; and/or 3. It is a ‘rural exception site’, where development is appropriate, sustainable, affordable and meets an identified local need; and/or It is demonstrated that the proposal is enabling development, required in order to maintain a heritage asset of acknowledged importance; and/or 5. It is a replacement dwelling or subdivision; and/or 6. It is a house extension; and/or 7. It will involve essential community facilities; and/or 8. It will involve the re-use of an existing rural building; and/or 9. It is a scheme of up to 9 dwellings at a designated Tier 4a or 4b settlement, supported by the local community.*

**The Proposed development within Slimbridge Parish doesn’t appear to fit any of the above criteria.**

Sustainability Appraisal Report for the Stroud Draft Local Plan 65 November 2019 asks:

*SA 5.3: Does the Plan safeguard and enhance the identity of the District’s existing communities and settlements?*

*SA8, 8.4: Does the Plan prevent coalescence between settlements?*

*SA 8.5: Does the Plan protect and enhance the District’s natural environment assets.*

**The proposed development within Slimbridge Parish doesn’t safeguard settlement identities, prevent coalescence and certainly does not protect or enhance the natural environment.**

*The Slimbridge Village Design Statement December 2016*

*Slimbridge Landscape and Natural Environment (SLN) Key Objectives: To conserve the identity of the separate villages of Slimbridge and Cambridge and the smaller hamlets surrounding these. The open and rural nature of the area should be conserved and encouragement for the natural environment to be preserved.*

*SLN 2 In order to protect the separate identity of the villages and hamlets and the quality of the countryside (including its built and natural heritage), proposals outside identified settlement development limits will not be permitted that do not accord with the principles in the Adopted Stroud District Local Plan (2015) and particularly where they also involve the loss of quality landscape features or result in an adverse impact on local character. It is important to prevent the areas merging into one another so as each hamlet can keep its own identity and preserve its setting and character. Relating to policy CP15 in the Local Plan referring to quality living and working in the countryside; and ES12 as this refers to site appraisal using local design statements and ensuring design and access statements.*

**In addition to this the coalescence with Cam creates one large urban sprawl from the Cotswold escarpment through to the Severn Estuary and therefore it should be removed from the draft Local Plan. The M5 motorway cannot be considered a natural and clear break between the two settlements. If the plan is adopted it will result in 3,500+ new houses either planned, in planning, or proposed to be built at Cam and Wisloe.**

**This makes it the single largest house concentration in the district and therefore when assessing the impact on the environment, service infrastructure and road infrastructure it is only right to consider this as one big development and not to dilute the issues by stating that it is two!**

**One of the defining characteristics of a 'Garden Village' (as Wisloe is described) is a 'new discrete settlement, and not an extension of an existing town or village'. This does not exclude proposals where there are already a few existing homes. Clearly therefore, the proposed Wisloe development, which joins Dursley/Cam with Slimbridge, Cambridge and Gossington is not a Garden Village.**

### **Conclusion**

The proposed site falls outside the settlement development limits of both Slimbridge and Cambridge and falls very short of protection the identities of the settlements of Slimbridge, Cambridge and Gossington. In addition to this, the issues with coalescence with Cam creates one large urban sprawl from the Cotswold Escarpment through to the Severn Estuary and therefore it should be removed from the draft Local Plan.

## **POSITION WITHIN THE DISTRICT**

The majority of the projected delivery of new houses are in the South of the district whilst the majority of employment places and services are located to the North of the district. This results in the creation of dormitory settlements thereby increasing the number of people commuting and also extending the length of their journeys.

*The National Planning Policy Framework (NPPF) February 2019 104 States*

*“Planning policies should: a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;”*

*NPPF also states*

*2.54 encourages local planning authorities to promote land uses, transport infrastructure and technologies that reduce the need to travel, greenhouse gas emissions and congestion. Developments that will generate significant movement are required to be located where travel can be minimised, and the use of sustainable transport modes maximised.*

*2.55 requires that “transport issues should be considered from the earliest stages of plan-making”. The scale, location and density of development should reflect “opportunities from existing or proposed transport infrastructure”. To help reduce congestion and emissions and improve air quality and public health the planning system should focus significant development “on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”.*

**The proposed development in Slimbridge Parish does not seem to be commensurate with the above with regards to current commuter trends.**

*Sustainability Appraisal Report for the Stroud Draft Local Plan 65 November 2019 poses the questions*

*SA 10.2: Does the Plan promote more sustainable transport patterns and reduce the need to travel, particularly in areas of high congestion, including public transport, walking and cycling*

*SA 10.3: Does the Plan promote more sustainable transport patterns in rural areas*

*SA 16.2: Does the Plan provide for accessible employment opportunities?*

*SA 16.3: Does the Plan support the prosperity and diversification of the District’s rural economy?*

**Again, the proposed development in Slimbridge Parish does not seem to be commensurate with the above with regards to current commuter trends.**

### **Furthermore**

SDC’s own Settlement Role and Functions Study in 2018 shows that the Berkeley Vale already has the highest commuter miles of the district, the fewest jobs, along with the lowest level of amenities and infrastructure and this results in the highest level of car ownership in the district. Alternative sites closer to the main employment centres would be more appropriate than large sites in the south which are equidistant from both major employment centres.

SDC’s Draft Sustainable Transport Strategy Document shows that the average commute distance in the area is 17km. This is consistent with the fact that people largely work away from the locality.

Even if public transport use and cycling to work was to be doubled there would be negligible impact on car use. The Cycling and Walking Investment Strategy (2017) is probably a useful reference for town dwellers, not rural communities.

The car is seen as a necessity not just for commuting but also to reach shops, entertainment facilities, etc. This is the economic and practical reality. Indeed, SDC itself recognises that public transport is infrequent and often unreliable.

### **Conclusion**

The proposed development in Slimbridge Parish is in an area of relatively low employment and therefore will become yet another dormitory settlement increasing commuter miles and therefore production of harmful emissions.

This is in direct contradiction to SDC's CN2030 commitment and fails to comply with other SDC and NPPF's policies on the location of developments in terms of employment, services and infrastructure and should therefore be removed from the local plan.

How can SDC justify building the majority of its housing commitment in a rural area with little local employment and infrastructure when other sites are available and are closer to work centres?

## **INFRASTRUCTURE**

This section assesses the issue of infrastructure relating to the proposed Slimbridge (Wisloe) site. Economic infrastructure aspects specifically relating to transport and water/sewerage are covered separately in other sections.

The proposed Wisloe 'Garden Village' development of 1500+ dwellings is immediately adjacent to potentially 2000+ new dwellings at the northern side of Cam. Wisloe is in the parish of Slimbridge whereas the Cam extension is within Cam's parish however the new residents will not recognise the invisible parish boundary. From an infrastructure perspective a new dwelling demand of circa 4000 should be used for any assessment. One of the defining characteristics of a 'Garden Village' is a 'new discrete settlement, and not an extension of an existing town or village. This does not exclude proposals where there are already a few existing homes. Clearly therefore, the proposed Wisloe development, which joins Dursley/Cam with Slimbridge, Cambridge and Gossington is not a Garden Village.

As occurred in the 1920s when New Towns were first introduced, many developers throughout the country are adopting the term 'garden village' in the branding of their developments, regardless of the extent to which there is a commitment to deliver in line with the Garden City principles.

Based on an average household rate of four residents/dwelling Wisloe alone could potentially increase to 6,000 residents, whereas inclusion of the new north Cam developments would swell the total to an additional demand of 14,000 inhabitants. This sudden influx will put enormous strain on the infrastructure in the local area. The following is an assessment of a few of the major infrastructure aspects (excluding transport and water/sewerage):

**Schooling** – The Wisloe proposal mentions provision for a new primary school, presumably to accommodate the children from both Wisloe and north Cam? Experience from other similar developments shows that new schools are constructed too late in the process which causes massive disruption during the initial period when there is a significant shortage of places at existing local schools. The tendency is also for new residents to housing estates to be young families which will have a disproportionately high number of children. Over time this will result in an initial bow wave of children passing through which will then be followed by a significant reduction. This fluctuation will put enormous strain on the existing surrounding primary schools. The local secondary schooling is at Rednock which is already at full capacity and there are no plans to increase capacity. Therefore, additional children beyond the Cam parish boundary, from the Slimbridge parish (Wisloe), will have to attend an alternative secondary school which will be much further away. In November 2018 GCC recognised they needed to increase the provision of secondary school places as a result of past birth rates alone. In addition, they noted that the then Cam developments required additional school places. If local children were to attend Rednock school this would necessitate a major investment and extension to the school building.

**Sports Centre and Leisure Facilities** – The Wisloe proposal currently mentions a 'community facilities' building which is likely to be similar to the one in the centre of Cam i.e. a café.

Major sports and leisure facilities (including a swimming pool) will continue to be provided in Dursley. The Pulse in Dursley is already near full capacity with very little flexibility to accommodate any additional Wisloe and north Cam residents. Demand from new residents will further reduce the accessibility for sports and leisure facilities for existing residents in the local area.

**Supermarkets** – The main centres of Cam and Dursley have sufficient supermarket capacity for the local area but parking is at a premium. The parking outside the Pulse and at Sainsburys in the centre of Dursley is particularly congested and will only deteriorate further with the significant increase in resident numbers wanting to use the facilities.

**GP Surgeries** – There are currently two GP practices at three sites (including Cam/Uley) and they are both full. An additional GP practice will need to be established in the north Cam/Wisloe area to cater for the increased demand or the existing practices extended to cope with the increased demand. The same applies to dental practices and pharmacies.

**Policing and fire service** - Policing is under great strain at the moment (nationally and locally), Cam police station is not continuously manned any longer and there is no mention of how this will be affected by the significant increase in local population or how it will be addressed?

**Transport** – This aspect is covered in more detail within a separate WAG response and is included here for completeness only. The Local Plan assumes there will be little impact on traffic volumes as people will use public transport or cycle.

Existing evidence shows that most people prefer to drive. Cam and Dursley railway station is not easily accessible so most people need to drive to it and so usage is limited by car park capacity, and even if more spaces were available, it's a matter of choice.

The service from the station is poor and is unlikely to be capable of improvement. It provides 2 & 3 carriage trains and there are no convenient stations near the major employment areas of Stonehouse and Quedgeley. Public transport is slow and infrequent to the same areas, so people prefer to drive to work. Access to the services in Cam and Dursley are only really possible by car because of the distance and the poor pedestrian provision on the A4135. This further increases traffic and pollution. There will be major issues accessing and using the A38 and there are no plans to deal with this. A significant financial investment in additional rail and road capacity is required to match the proposed resident increase to keep the area moving and to avoid massive congestion.

Access to these facilities will almost certainly be by car which will increase traffic flows, albeit no worse than the daily commute from these dormitory settlements, but there will be significant increase in demand for parking.

If past experience is anything to go by then it's most likely the local area will not receive additional funding from Government/county/district to invest in improving the local infrastructure to match the increase in local population. Recognising this reality means it would be more appropriate for SDC to adopt a dispersive approach to housing allocation which would share out the additional demands on infrastructure more equitably across the district.

The Wisloe proposal does not therefore comply with the NPPF 122 (c) requirement to account for appropriate levels of *availability and capacity of infrastructure and services* – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use. Furthermore, the Wisloe proposal is not compliant with SDC's Sustainability Appraisal report as it does not:

*SA 2.1: Plan to improve access to doctors' surgeries and health care facilities*

*SA 6.2: Promote the provision of new and the protection of existing services and facilities at sustainable locations*

*SA 10.2: Promote more sustainable transport patterns and reduce the need to travel, particularly in areas of high congestion, including public transport, walking and cycling*

**In summary, the assessment above shows the significant increase in housing proposed for Wisloe and north Cam would put enormous strain on the existing infrastructure as very little new infrastructure will be developed, it is not clear what options are available to meet the increased demand? Many of the existing facilities are already operating at full capacity and have no ability to increase.**

**Dispersing the housing requirement in a more equitable fashion across the district would avoid the bottleneck issues described above and save SDC from significant investment in new infrastructure. This WAG assessment concludes the Wisloe site proposal should not be included in the Local Plan.**



## TRANSPORT

### Road Traffic

There can be no doubt whatsoever that the building of up to 1500 new homes at Wisloe along with the large number of other proposed homes in both the Cam and Berkeley clusters will further stress the current road infrastructure in the immediate vicinity. Furthermore, the developments further afield such as at Hardwick and Falfield will only serve to accentuate this.

Transport and transport planning do not fall within the strict remit of the district council, but it has obligations through the planning process to consider the effects of developments on road infrastructure. The Department of Transport Circular 2/13 concerning The Strategic Road Development and the Delivery of Sustainable Development (a policy to be read by Authorities and developers alike) notes the following:

*'Development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the strategic road network, or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.'*

The A38 access to the M5 at Junction 14 already operates to capacity as noted by the Highways and Transport Technical Overview commissioned by Ernest Cook Trust and Gloucestershire County Council. It is a major cause of congestion at the busiest times of the day on the A38. We would suggest the cumulative impacts are already severe and will only get worse.

In November 2019 SDC published its Draft Sustainable Transport Strategy Document. Along with SDC's 'commitment' to be carbon neutral by 2030 there are many facets that are laudable. The document has seen much energy put in extolling the health benefits of cycling and walking and the provisions for improvement. However, for these aspirational policies to be taken seriously there needs to be acceptance of economic reality and an honesty with the public particularly with regards to proposed developments and the timeframes involved.

The STS document for the district notes the following commuter 'journey to work' statistics;

Work from home	9%
Walk	9%
Cycle	2%
Bus	2%
Train	1%
Car Passenger	5%
Self Drive car/van	70%
Other	2%

This is hardly surprising – we do live in a rural community. The average commute distance is 17km, again consistent with the fact that people largely work away from the locality. Even if public transport use and cycling to work was doubled there would be negligible impact on car use. The Cycling and Walking Investment Strategy (2017) is probably a useful reference for town dwellers. The car is seen as a necessity not just for commuters but families, shoppers etc. This is the economic and practical reality. Indeed, SDC itself recognises that public transport is infrequent and often unreliable.

The proposed Wisloe site of 1500 houses plus a further 2,000+ in Cam could see at least a further 3,500 vehicles 'on site' and possibly many more as 47.5% of SDC households have 2 or more vehicles. That is more vehicles (however green they may be in the future) taking people to and from work because the places of work are not in Wisloe!

Furthermore, the Sustainability Appraisal Scoping Report for the Stroud District Local Plan Review (LUC April 2018) notes the following with regards to transport issues.

#### *Transport*

*2.54 The NPPF encourages local planning authorities to promote land uses, transport infrastructure and technologies that reduce the need to travel, greenhouse gas emissions and congestion. Developments that will generate significant movement are required to be located where travel can be minimised, and the use of sustainable transport modes maximised.*

*2.55 The draft revised NPPF requires that “transport issues should be considered from the earliest stages of plan-making”. The scale, location and density of development should reflect “opportunities from existing or proposed transport infrastructure”. To help reduce congestion and emissions and improve air quality and public health the planning system should focus significant development “on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.” The draft revised framework also requires that planning policies support an appropriate mix of uses across an area to further help reduce the need to travel as well as the provision of high-quality walking and cycling network.*

**The Wisloe development proposal does not seem commensurate with the above with regards to current commuter trends.**

#### **Rail Traffic**

The proximity of the Cam and Dursley (C&D) train station may seem an attractive alternative to the car for the potential Wisloe dweller/commuter. However, access and parking at this station is now a major issue particularly with the further residential developments that have taken place along Box Road. C&D is a simple 2 platform station with no loops or sidings. There is evidence to suggest that the Gloucester/Bristol line is itself operating to capacity. Stopping services at C&D are generally served by two or three coach trains. They are frequently late and congested. Network Rail recently advised that there about 125 daily movements on the line including non-stopping express traffic and freight movements. They are currently engaged on a study to assess rail capacity.

Furthermore, there has been the suggestion that the Sharpness branch line could be reactivated to C&D as part of a travel plan for proposed homes in the Sharpness area. This, of course, will only stress the network further unless there were station modifications.

## **Pedestrian Traffic**

The A4135 crosses the main railway line. The current narrow pavement on the north side of the carriageway is the only pavement available to pedestrians and is not fit for purpose. The suggested increased pedestrian traffic would necessitate an alternative means of crossing the line, probably by a separate bridge. Furthermore, residents on the south side of the A4135 wishing to walk towards Cam will need a means to cross before reaching the railway bridge. To do so safely will surely mean a traffic light controlled crossing which again will hinder traffic flow at peak times.

## **SETTLEMENT TIERING**

This document assesses the issue of tiering for the villages immediately affected by the proposed Wisloe development.

The proposed Wisloe development is bounded by the M5, A38, railway line and river Cam and is entirely within the parish of Slimbridge. The settlements which would be affected by the proposal are the main villages of Slimbridge and Cambridge and the surrounding hamlets of Gossington and Wisloe. The Wisloe proposal is being marketed as a 'Garden Village' but that is irrelevant as far as this assessment is concerned which is purely based upon the impact to tiering resulting from introduction of a large housing estate.

The current Wisloe plan stretches from Cambridge in the north to Gossington in the south tracking the edge of the A38. The edge of Slimbridge village, in the centre of the proposal abuts the A38, Wisloe is completely surrounded in the proposal. One road width of separation is not sufficient delineation between settlements to distinguish between them. Essentially, the proposal joins all four settlements with Wisloe.

The draft Local Plan states Slimbridge to be Tier 3b and Cambridge to be 4a (was previously 5). Tier 3b states 'These small and medium sized rural villages provide a range of services and facilities for their communities, but some have poor access to key services and facilities elsewhere and they all face significant environmental constraints to growth'. Tier 4a states 'These small and very small villages provide a limited range of services and facilities for their communities. These settlements are relatively less sustainable for growth and most face significant environmental constraints. Both Tier categories state they are **not suitable for growth** yet the proposed Wisloe proposal would join them all up creating a single settlement three times the current size (from 500 to 2000 dwellings). This housing growth increase does not comply with the current Tier rating definitions for the villages contained in the Local Plan.

Furthermore, the current housing developments proposed for the north of Cam, if accepted, will join with the Wisloe development thus creating a single amorphous urban sprawl from the Cotswold AONB in Dursley through to the Severn Valley. The coalescence of the villages around Wisloe with Cam and Dursley (both Tier 1 settlements) will remove their individual identity and effectively make all the villages Tier 1 settlements as well. This new large Tier 1 urban conurbation which coalesces the villages of Slimbridge, Cambridge and Gossington with Cam/Dursley is contrary to SA8 of the SDC Sustainability Appraisal.

**It does not:**

***SA 8: Conserve and enhance the local character and distinctiveness of the landscape.***

***SA 8.1: Protect and enhance the District's sensitive and special landscapes.***

***SA 8.2: Prohibit inappropriate development that will have an adverse effect on the character of the District's countryside and settlements.***

***SA 8.3: Promote the accessibility of the District's countryside in a sustainable and well-managed manner.***

***SA 8.4: Prevent coalescence between settlements.***

***SA 8.5: Protect and enhance the District's natural environment assets (including parks and green spaces, common land, woodland and forest reserves***

**The WAG assessment of 'Tiering' concludes the Wisloe proposal does not comply with the level 3 and 4 tiering definitions for Slimbridge and Cambridge respectively defined in the Draft Local Plan and should not be accepted. The Wisloe proposal would result in major coalescence, loss of individual village identity and absorption into a significant new development which would grow the villages by a factor of four.**

## **IMPACT TO THE RURAL COMMUNITY**

SDC's Core Strategy states that it *"aims to protect and enhance the natural and built environment of the district"*. The Stroud area is officially designated a Rural District with the Severn Vale, in which the Slimbridge Parish is located, being its most rural part.

The Sustainability Appraisal Report states that the District is *"mostly rural in character with 51.6% of the land classed as rural. The population density in the most rural parts of the District is less than one person per hectare"*.

[www.openaccessgovernment.org](http://www.openaccessgovernment.org) states that a Garden Village *"By definition, it is a piece of brownfield land that is used to develop new areas for families and businesses"*.

**This is not true of the proposed Slimbridge site, which is primarily greenfield, apart from the Wisloe Farm site which resides directly below the A4135 and contains an arena and agricultural barns.**



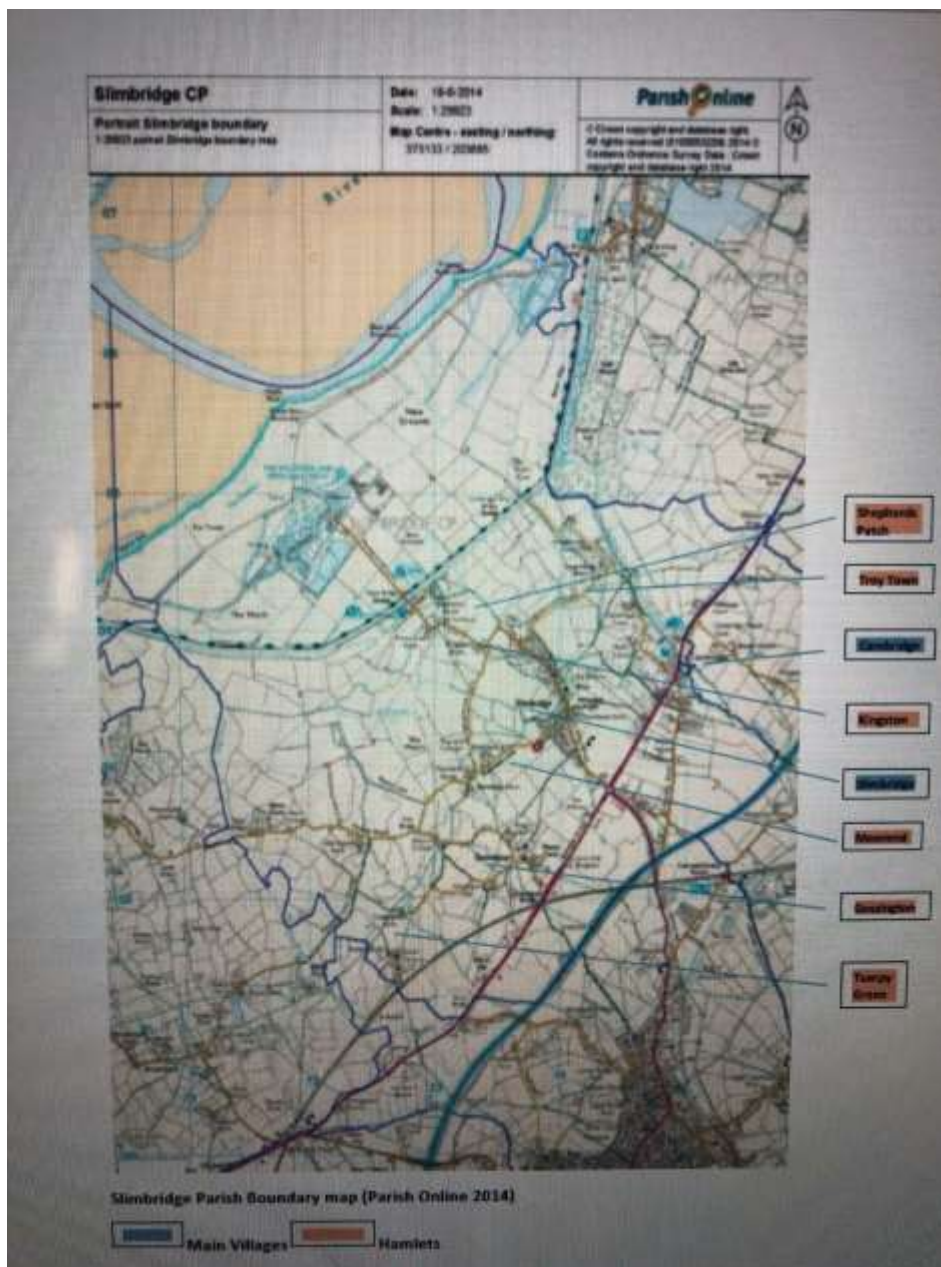
Photo 1 – North of the A4135



Photo 2 - South of the A4135

The Slimbridge Village Design Statement provides detail on how the parish has evolved over time with small developments and on primarily open, flat, farming countryside.

The Slimbridge Parish has developed organically and is linear in form with dispersed communities as shown in the map below <https://www.stroud.gov.uk/media/241059/2016-12-final-slimbridge-village-design-statement.pdf> .



Slimbridge Built Environment (SBE) Key objectives: To ensure any future development enhances the character and identity of the area, safeguarding traditional buildings and key features. Issues: Some recent developments have had little consideration for the appropriateness of the local settings with a danger of urbanising the rural parish that Slimbridge wishes to remain.

The proposed allocation of such a large site physically joins Slimbridge, Gossington, Cambridge and Cam and will fundamentally change the rural community forever as it will become a town. It is not in keeping with the current built form. The proposal to include a town sized housing estate in a very rural community will destroy the very nature, beauty and character of what makes it a wonderful place to live, work and play.

## EMPLOYMENT ISSUES

In respect of the Stroud economic strategy, there is an aspiration to create two jobs for every new dwelling. It is considered that this is an ambitious approach and there is insufficient explanation of how it will be achieved. The Berkeley ward currently offers little in the way of employment and the Local Plan doesn't address this issue.

*The Draft Local Plan 2019 states: -*

*2.56 There is considerable out-commuting to work, which presents a big challenge if we are to reduce our District's carbon footprint as a rural district, many people are car-dependent, so we also need to ensure that access to jobs, services and facilities can be improved in the future and our chosen strategy must enable more sustainable forms of transport to be used. In order to stem out commuting Stroud will need to attract more knowledge-based industries, enabling greater employment opportunities for the highly skilled and well qualified working population. This suggests a need for the District to both increase and diversify its employment base, in order to provide local job opportunities, appropriate to the workforce and to help reduce the number of people travelling to towns and cities beyond the District for work.*

Core Policy DCP1 discourages the use of private car and seeks to minimise the need to travel. Dursley, Cam and the surrounding area are already dormitory settlements and with little in the way of employment planned for the area it is inevitable that the use of private car usage will rise.

*Cam Parish Councils employment report 2019 is concerned about the number of residents travelling to work outside of the district and comments: -*

*Developers need to build significant numbers of larger (4- and 5-bedroom) housing to make developments viable, particularly with the significant infrastructure burden placed upon such developments. Yet these larger sized houses will house higher earners who typically will commute out to where the higher value jobs are located, i.e. Bristol and Gloucester.*

**Cam and Dursley are known dormitory settlements with workers often travelling to employment centres in Stroud, Stonehouse and outside of the District to Gloucester and Bristol. The proposed development offers little in the way of business premises and certainly will be well short of the target of two jobs for every dwelling.**

*The Sustainability Appraisal of Stroud District Council's Local Plan Review 2019 States: -*

*SA 16: To deliver, maintain and enhance sustainable and diverse employment opportunities, to meet both current and future needs.*

And poses the questions: -

*SA 16.1: Does the Plan allow for an adequate supply of land and the delivery of infrastructure to meet the District's employment needs?*

*SA 16.2: Does the Plan provide for accessible employment opportunities?*

*SA 16.3: Does the Plan support the prosperity and diversification of the District's rural economy?*

*SA 16.4: Does the Plan support equality of opportunity for young people and job seekers and opportunity for the expansion and diversification of business*

**The plan fails to address any of these questions.**



*SA 17: To allow for sustainable economic growth within environmental limits and innovation, an educated/ skilled workforce and support the long term competitiveness of the District.*

*And possess the questions: -*

*SA 17.1: Does the Plan seek to promote business development and enhance productivity?*

*SA 17.2: Does the Plan maintain and enhance the economic vitality and vibrancy of the District's town centres and tourist attractions?*

*SA17.3: Does the Plan promote the image of the District as an area for investment and will it encourage inward investment?*

*SA17.4: Does the Plan promote access to education facilities for residents?*

*SA17.5: Does the Plan help to support increased economic activity throughout the District?*

**Once again, the plan fails to address any of these questions.**

## **Conclusion**

The proposed development within Slimbridge Parish fails to delivery anywhere near the number of employment opportunities to meet with SDC's aspirations, current local requirements and certainly not for the 3000 plus new residents that will inhabit the new houses. The Berkeley ward is already a huge dormitory area where workers outnumber employment places by a factor of 3:1. This has already resulted in the average commute to work distance being 17km and car ownership being the highest in the district. The failure of the district council to meet the employment requirements of Cam, Dursley is already a problem and this can only be exacerbated with the proposed development.

## ECOLOGY

The proposed Slimbridge site does not meet the requirements of the NPPF which states;

*To contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

**The proposed Slimbridge site cannot contribute and protect the natural environment as building on this land will impact the wildlife that it currently sustains.**

### **Recreational Catchment Zone**

The proposed Slimbridge site is located within the identified 7.7km recreational catchment zone of the Severn Estuary which is designated as a Special Protection Area (SPA), a Special Area of Conservation (SAC) and Ramsar site (RS) for its overwintering birds, estuarine habitats and associated species of fish. Habitat Regulation Assessments (HRA) concluded that proposed residential growth identified in the Local Plan within Severn Estuary SAC/SPA/Ramsar could have a likely significant effect.

In 2016 a Visitor Survey Report concluded that Likely Significant Effects on the conservation status of the SPA could not be ruled out.

The Strategy for Avoidance of Likely Significant Adverse Effects on the Severn Estuary SAC, SPA and RS is based on the Stroud District Local Plan (2015) which did not include such a large proposed development so close to the estuary, and is based on housing commitments of 11,400 (not the current proposed forecast which exceeds requirements).

New residential development will further exacerbate pressure to the catchment zone of the Severn Estuary as it brings more people to the local area and will affect the sensitive area through recreational disturbance. As set out in the Habitat Regulations Assessment of the Stroud District Local Plan (carried out by URS in 2014), it was identified that recreational pressure had the potential to impact upon the qualifying features for which the Severn Estuary was designated, in particular through disturbance to the bird species which use the Estuary for feeding and roosting during the Winter. When this strategy was developed it was never envisaged that SDC would propose a site of such massive scale and proximity to the Severn Estuary.

### **Ornithology**

European Birds Directive (2009): Requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

European Habitats Directive (1992): Together with the Birds Directive, the Habitats Directive sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.

European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979): Aims to ensure conservation and protection of wild plant and animal species

and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

The Wildfowl and Wetlands Trust (WWT) is one of the world's largest and most respected wetland conservation organisations working globally to safeguard and improve wetlands for wildlife and people. The WWT has a network of UK visitor centres comprising 2,600 hectares of globally important wetland habitat.

WWT Slimbridge and the surrounding land is of significant International importance. The proposed site is flat open space only 2.75km from the WWT. Protected wildfowl are recorded on the proposed site and the surrounding areas. A development on this site would impact wildfowl feeding grounds and cannot be mitigated against as once the land is covered in buildings the wide and open space is lost forever.

## **Mammals & Reptiles**

It is not possible to include all details of sighting in this response. The report evidence records of water vole, otters and bats. All of these mammals are protected and attempting to make a more significant return. The water vole is a much-loved British mammal better known as 'Ratty' in the children's classic *The Wind in the Willows*. Unfortunately, the future of this charming riverside creature is in peril; the water vole needs urgent help to survive in the UK. Water voles are a vital part of river ecosystems. Their burrowing, feeding and movements help to create conditions for other animals and plants to thrive. Water voles have suffered huge declines as a result of habitat loss, pollution of waterways, housing development and predation.

Once a regular sight in ditches, streams and rivers across the UK, water voles are now absent across much of the country. Conservation groups are working hard to keep water voles in our rivers and streams and restore them to places where they've been lost. By developing at the proposed site, even if a buffer is put in place, the mammal will be impacted by human disturbance of such a large housing population, and the mammal is highly unlikely to remain at the location.

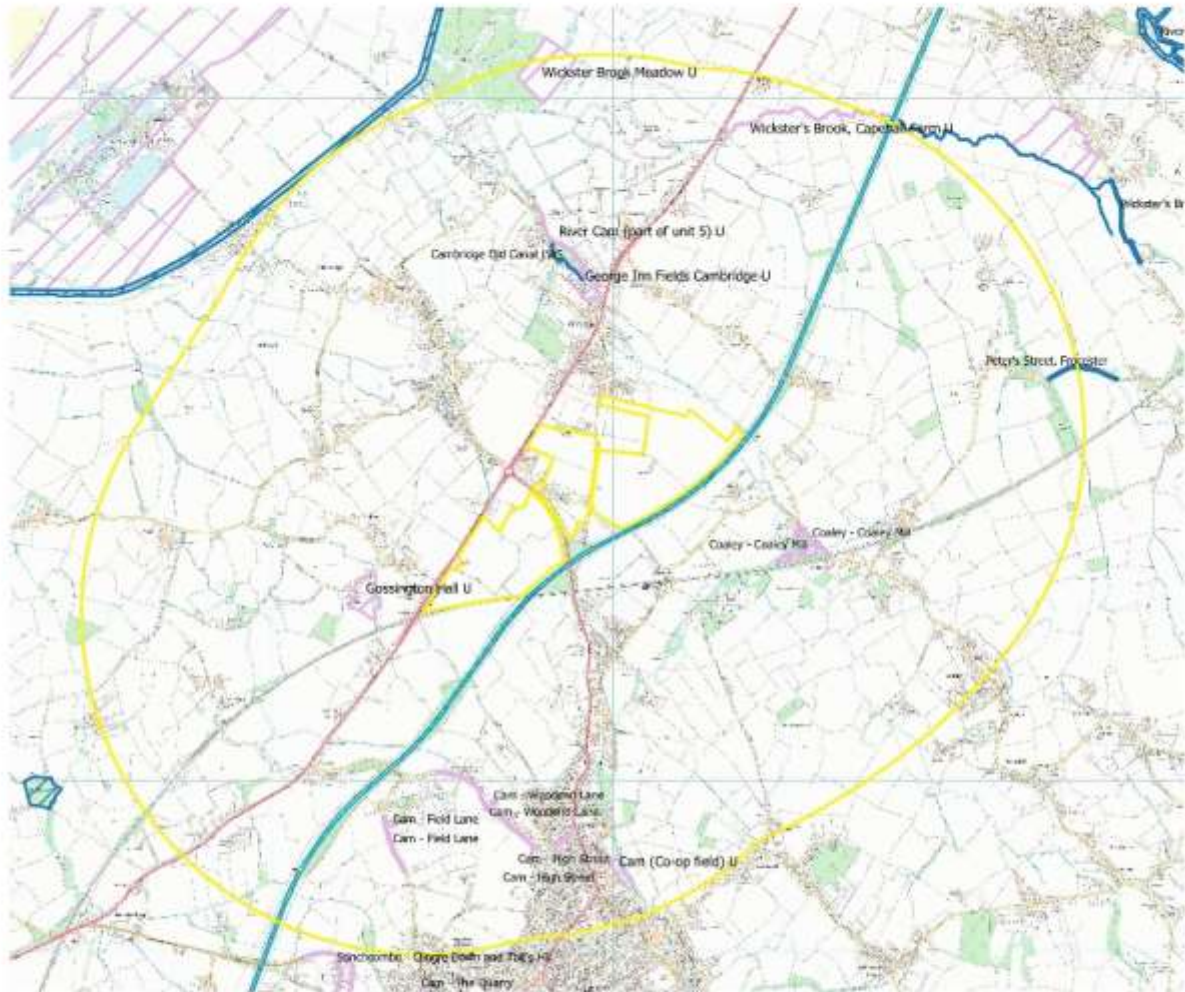
There are records of water vole at the proposed site and the surrounding area. There are also records of otters on the proposed site. The Eurasian otter is the only native UK otter species. It's fully protected as a European protected species (EPS) and is also protected under sections 9 and 11 of the Wildlife and Countryside Act 1981.

Bats are also a protected mammal. There are sighting at the site and a record of a roosting site in Slimbridge. There are also several species of reptiles that have been are recorded and sighted.

Gloucestershire Centre for Environmental Records (GCER)

GCER provide a unique source of information about the wildlife and natural environment of our county. Their database is updated continuously and forms a primary evidence base. The data below is based on an estimated 2km zone (see map below). However, as mentioned above the ecological impact should be considered for a much wider area (see this 7.7km recreational catchment zone section above).

## Overview of sites within 2km



Zoom in for more detail



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Date produced: 02/09/2019

Scientific name	Common Name	Date/Year last recorded	Status
<i>Falco peregrinus</i>	Peregrine	2014-04-06	Bern-A2, BirdsDir-A1, CMS_A2, ECCITES-A, WACA-Sch1_part1
<i>Larus canus</i>	Common Gull	2011-04-22	Bird-Amber, CMS_AEWA-A2
<i>Tyto alba</i>	Barn Owl	2012-09-24	Bern-A2, ECCITES-A, WACA-Sch1_part1
<i>Strix aluco</i>	Tawny Owl	2014-01-22	Bern-A2, Bird-Amber, ECCITES-A
<i>Motacilla flava</i>	Yellow Wagtail	2015-07-08	UK Priority Species 2007, England NERC S.41, Bern-A2, Bird-Red,
<i>Motacilla flava subsp. flavissima</i>	Yellow Wagtail	2011-04-22	UK Priority species-2007, Bern-A2, Bird-Red, England_NERC_S.41,
<i>Motacilla cinerea</i>	Grey Wagtail	2013-09-19	Bern-A2, Bird-Red
<i>Turdus philomelos</i>	Song Thrush	2014-01-10	UK Priority Species 2007, England NERC S.41, Bird-Red,
<i>Muscicapa striata</i>	Spotted Flycatcher	2013-09-22	UK Priority species-2007, Bern-A2, Bird-Red, CMS_A2, England_NERC_S.41,
<i>Falco tinnunculus</i>	Kestrel	2014-01-08	Bern-A2, Bird-Amber, CMS_A2, ECCITES-A,
<i>Emberiza schoeniclus</i>	Reed Bunting	2013-10-02	UK Priority species-2007, Bern-A2, Bird-Amber, England_NERC_S.41,
<i>Anas platyrhynchos</i>	Mallard	2011-05-12	Bird-Amber, CMS_A2, CMS_AEWA-A2
<i>Anser anser subsp. anser</i>	Greylag Goose	2011-07-29	Bird-Amber, CMS_A2, CMS_AEWA-A2,
<i>Passer domesticus</i>	House Sparrow	2014-03-09	UK Priority species-2007, Bird-Red, England_NERC_S.41,
<i>Turdus iliacus</i>	Redwing	2014-01-14	Bird-Red, WACA-Sch1_part1
<i>Falco subbuteo</i>	Hobby	2013-08-22	Bern-A2, CMS_A2, ECCITES-A, WACA-Sch1_part1
<i>Columba oenas</i>	Stock Dove	2012-03-10	Bird-Amber,
<i>Apus apus</i>	Swift	2015-05-08	Bird-Amber,
<i>Alauda arvensis</i>	Skylark	2012-01-15	UK Priority Species-2007, Bird-Red, England_NERC_S.41
<i>Delichon urbicum</i>	House Martin	2014-09-26	Bern-A2, Bird-Amber
<i>Pyrrhula pyrrhula</i>	Bullfinch	2011-06-21	UK Priority Species 2007, England NERC S.41, Bird-Amber,
<i>Anthus pratensis</i>	Meadow Pipit	2014-01-14	Bern-A2, Bird-Amber
<i>Milvus milvus</i>	Red Kite	2013-03-27	BirdsDir-A1, CMS_A2, ECCITES-A, RedList_Global_Near Threatened, WACA-Sch1_part1



<i>Numenius phaeopus</i>	Whimbrel	2016-07-11	Bird-Red, CMS_A2, CMS_AEWA-A2, WACA-Sch1_part1
<i>Larus fuscus</i>	Lesser Black-backed Gull	2011-05-24	Bird-Amber, CMS_AEWA-A2
<i>Turdus viscivorus</i>	Mistle Thrush	2011-05-24	Bird-Red,
<i>Prunella modularis</i>	Dunnock	2012-03-10	UK Priority Species 2007, England NERC S.41, Bern-A2, Bird-Amber
<i>Anser anser</i>	Greylag Goose	2014-02-24	Bird-Amber, CMS_A2, CMS_AEWA-A2,
<i>Linaria cannabina</i>	Linnet	2015-07-22	UK Priority Species 2007, England NERC S.41, Bern-A2, Bird-Red,
<i>Numenius arquata</i>	Curlew	2016-10-29	UK Priority species-2007, Bird-Red, CMS_A2, CMS_AEWA-A2, England_NERC_S.41, RedList_Global_Near Threatened
<i>Numenius arquata</i>	Curlew	2016-07-11	UK Priority species-2007, Bird-Red, CMS_A2, CMS_AEWA-A2, England_NERC_S.41, RedList_Global_Near Threatened
<i>Chroicocephalus ridibundus</i>	Black-headed Gull	2015-05-08	Bird-Amber, CMS_AEWA-A2,
<i>Turdus pilaris</i>	Fieldfare	2011-10-16	Bird-Red, WACA-Sch1_part1
<i>Sturnus vulgaris</i>	Starling	2015-05-08	UK Priority Species 2007, England NERC S.41, Bird-Red,
<i>Vanellus vanellus</i>	Lapwing	2012-02-12	UK Priority species-2007, Bird-Red, CMS_A2, CMS_AEWA-A2, England_NERC_S.41,
<i>Meles meles</i>	Eurasian Badger	2008-01-27	Bern-A3, Protection_of_Badgers_Act_1992
<i>Delichon urbicum</i>	House Martin	2011-06-11	Bern-A2, Bird-Amber
<i>Lutra lutra</i>	European Otter	2008-06-07	UK Priority species-2007, Bern-A2, ECCITES-A, England_NERC_S.41, HabDir-A2*, HabDir-A4, HabReg-Sch2, WACA-Sch5_sect9.4b, WACA-Sch5_sect9.5a, WACA-Sch5Sect9.4c
<i>Falco tinnunculus</i>	Kestrel	2014-10-26	Bern-A2, Bird-Amber, CMS_A2, ECCITES-A,
<i>Alauda arvensis</i>	Skylark	2014-10-26	UK Priority Species-2007, Bird-Red, England_NERC_S.41
<i>Lutra lutra</i>	European Otter	2008-06-07	UK Priority species-2007, Bern-A2, ECCITES-A, England_NERC_S.41, HabDir-A2*, HabDir-A4, HabReg-Sch2, WACA-Sch5_sect9.4b, WACA-Sch5_sect9.5a, WACA-Sch5Sect9.4c
<i>Lutra lutra</i>	European Otter	2007-05-05	UK Priority species-2007, Bern-A2, ECCITES-A, England_NERC_S.41, HabDir-A2*, HabDir-A4, HabReg-Sch2, WACA-Sch5_sect9.4b, WACA-Sch5_sect9.5a, WACA-Sch5Sect9.4c

<i>Alcedo atthis</i>	Kingfisher	2008-06-07	Bern-A2, Bird-Amber, BirdsDir-A1, WACA-Sch1_part1
<i>Arvicola amphibius</i>	European Water Vole	2008-06-07	UK Priority species-2007, England_NERC_S.41, RedList_GB_Endangered, WACA-Sch5_sect9.4.a, WACA-Sch5_sect9.4b, WACA-Sch5Sect9.4c

## Gloucestershire Bird Recorder

A full bird survey report over a significant number of years has been provided by the official Gloucestershire Bird Recorder. This is data for the one km grid square SO7402. It is not possible to provide the level of detail in this report (due to size of records) but this is available in excel format. This record contains protected birds including curlew, lapwing etc.

<https://www.curlewcall.org/>

## Ecotricity Report

The following report was submitted to SDC, published in January 2016. Chapter 8 provides ecological information for a 5km area surrounding the M5 Junction 13.

[https://www.ecotricity.co.uk/layout/set/popup/layout/set/print/content/download/977991/27070601/file/Volume%203%20-%20Figures\\_Part1.pdf](https://www.ecotricity.co.uk/layout/set/popup/layout/set/print/content/download/977991/27070601/file/Volume%203%20-%20Figures_Part1.pdf)

## The Developers Ecological Survey

The Ecological Survey conducted on behalf of the developers took place over two days in September 2019. The two days appear to include field walk taking photographs and a desk based summary drawn from one report in a limited zone around the site and is not representative of the site, and surrounding land, wildlife Mammals and birds are transient, this has not been taken into account by the developers' ecological assessment.

## Local Knowledge/Sightings/Records

In addition, there are sightings and records at a local level which can be provided separately.

A neighbouring landowner has commissioned a more extensive ecological assessment of their land. This will be made available when complete.

## NPPF Environmental Objective

A further requirement of the NPPF's environmental objective is that the planning system should contribute to protecting and enhancing the natural environment including helping to improve biodiversity and using natural resources prudently.

*In support of this aim the NPPF states that Local Plans should:*

*“identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks” and should also “promote the conservation, restoration and recreation of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*

Many species of mammal and birds require the open space and cannot be replaced. It is also stated in the vision that the protection of the area's distinct built heritage, estuarine landscape and habitats will remain a priority.

Specific reference is included relating to a variety of attractions which may help to raise the profile of this part of the district. While the vision identifies that the conservation of these features will be a priority, resilience to climate change and associated flood risk will also form part of the approach to the management of the area.



## DRAINAGE AND SEWAGE

The residents of Cambridge and Slimbridge are well acquainted with local surface water and sewage flooding which has been an ever-present part of life here for generations. Unfortunately, the incomplete and superficial desk-based appraisal prepared by Peter Brett Associates makes no mention of this or the close to £2 million remediation work recently completed by Severn Trent Water (STW) and GCC.

### **The Land**

It appears the developers are unaware of the full implications of building on such important land. Simply relying on the Environment Agency (EA) flood map is only part of the story. This only takes account of sea and river flooding, not surface water flooding. As we write this objection, the development land is waterlogged and in places, flooded. These pictures were taken as recently as 20 January 2020 and clearly show saturated soil conditions. This is particularly evident where the soil is compacted into a virtually impermeable condition similar to the effect of paving and construction.





Constructing impermeable surfaces on this land will result in increased flood risk for residents of Cambridge and Slimbridge. No amount of mitigating constructions can alter the fact that this land sits on a very high water table (again not mentioned in the appraisal) which, in storm conditions can rapidly flood. It is only the retention of water over the whole surface that limits the flow of water into the River Cam or Lighten Brook (the so-called unnamed brook to the south of the A4135).

### **Previous Drainage and Sewage Work**

The work completed by STW and GCC in 2017 was the result of years of study by both agencies in cooperation with the local community. The reason for this work was twofold. Sewage was backing up into houses and spilling out into the streets every time there was a combination of a high water table and heavy and persistent rain. Also, the surface water drainage system was medieval (literally) and incapable of coping with these same conditions and surface water was flooding properties.

The sewage system was working beyond its design capabilities due to excessive surface water infiltration and STW constructed a model to better understand how this could be addressed. The ideal solution was to replace the entire 1960s system, but this was deemed too expensive at around £6 million and STW opted for identifying the worst infiltration points and attempting to reduce the infiltration at these points. I believe the final bill for this was around £1.2 million. GCC Highways simultaneously installed a 300mm drainage pipe through the centre of Slimbridge village on St Johns road to bypass the old medieval culvert. This was at a cost of around £600k. The desired result was for infiltration to be reduced by 50%, not eliminate it. This is as yet unproven, although during the current flooding conditions residents of Ryalls Lane are reporting backups in the sewage system which suggests the work has not wholly been successful. This has been reported to STW on a number of occasions. STW and the Environment Agency (EA) are conducting a three-year study to assess the effectiveness of the programme after which further work may be required. As was mentioned earlier, flooding is a fact of life in this area and residents are fearful that thoughtless construction will almost certainly see the return of the pre-2017 conditions.

### **Where to put the extra water?**

There are glib assumptions in the appraisal that the flow of surface water into the River Cam and Lighten Brook can be held back through 'strategic attenuation features' in storm conditions. This is, frankly, preposterous and shows a lack of understanding of local conditions. Where we live is not a desk-based exercise!

By definition, the land adjoining the watercourses is already flooded when the greatest threat conditions exist. There is simply nowhere to hold the extra water generated by the construction of houses and roads. As one fire officer said when attending a flooded property in Slimbridge - 'we would pump the water out sir, but there is nowhere to pump it to'.

Lighten Brook is not a babbling brook and has historically been the cause of major flooding. It is a torrent in flood conditions and flows past the school and through the heart of Slimbridge village, sometimes piped and sometimes in an open culvert, through gardens and under a housing estate before it eventually reaches the River Severn. It is worth mentioning now that this objection draws attention to the implications of failing to prevent additional flow of surface water into both watercourses.

The developers and Stroud District Council (SDC) will be held jointly responsible for ignoring this warning should the development go ahead and result in damage to property and harm to residents' health.

### **Ongoing flood risk**

Cambridge residents routinely receive flood warnings from the EA. Clearly that agency does at least appreciate the precarious situation with regard to flooding in the area. Residents have already received six serious flood warnings this year.

An extract from the warning issued on 9 January 2020 reads:

*Other locations that may be affected include Chalford, Leonard Stanley and Cambridge. Flood water could be deep and fast flowing, and therefore pose a risk to life.*

These warnings will only increase in frequency and intensity with the onset of the effects of climate change. This will mean that the current EA flood risk areas will increase in size and the volume and velocity of the water will increase. How will SDC protect the children from the development when their lives will be at risk if they venture close to the ever-increasing flood zones?

*Some comments on the Sustainability Appraisal Report for the Stroud District Local Plan Review - Draft Plan prepared by LUC November 2019.*

*SA 8 states: To conserve and enhance the local character and distinctiveness of landscapes and townscapes and provide sustainable access to countryside in the District.*

*SA 8.2: Does the Plan prohibit inappropriate development that will have an adverse effect on the character of the District's countryside and settlements?*

**Answer: No, it does not. No amount of fluffy PR can disguise a housing estate of 1500 houses is proposed on surface water flood-prone land in Slimbridge parish.**

*SA 8.3: Does the Plan promote the accessibility of the District's countryside in a sustainable and well-managed manner?*



**Answer: No, this development builds on open countryside, is not sustainable and damages existing settlements.**

*SA 8.4: Does the Plan prevent coalescence between settlements?*

**Answer: No, it actually creates coalescence by creating uninterrupted housing from east Dursley to Slimbridge. Thereby enhancing flood risk for those downstream in Slimbridge parish.**

*SA 12 states: To manage and reduce the risk of flooding and resulting detriment to public wellbeing, the economy and the environment. The proposed development comprehensively fails all four objectives.*

*SA 12.1: Does the Plan reduce the risk of flooding from all sources including rivers, watercourses and sewer flooding to people and property?*

**Answer: No, it increases the risk.**

*SA 12.2: Does the Plan minimise development in areas prone to flood risk and areas prone to increasing flood risk elsewhere, taking into account the impacts of climate change?*

**Answer: No, it is being built in an area already prone to surface water flood risk and fails to account for the effects of climate change.**

*SA 12.3: Does the Plan increase the provision of sustainable drainage at new developments?*

**Answer: No, the proposals fail to take full account of current and historic difficulties with drainage and fails to provide sustainable solutions.**

*SA 12.4: Does the Plan promote flood risk reduction and improvement to the flood regime?*

**Answer: No, the appraisal is incomplete and provides no indication of effective flood risk reduction.**

## **Conclusions**

There are a number of conclusions:

The extensive work by STW and GCC completed in 2017 was very welcome but has reduced, not resolved, the flooding risk.

The development contravenes the SDC Sustainability Appraisal Report in a number of critical areas. How can SDC claim to be 'green' and respect the environment when it promotes flawed developments like this?

There is a complete failure to properly evaluate flood and health risks to both existing residents and potential occupiers of the development.

If you disregard the spurious placement of Wisloe in the Berkeley Cluster and replace the Wisloe Green name with what it really is, a Slimbridge parish development, it is easy to see that quadrupling the number of houses in a parish that already experiences an inadequate sewage system and regular flooding is nothing short of negligence.

The people of Slimbridge parish understand and work with the environment to best protect themselves from the ever-present threat of flooding. Lazy planning, like this proposal, reverses all the latest achievements and results in misery for the very people SDC claims to represent.

## AIR QUALITY

### **Objective**

To gather air quality data for the site PS37 and determine the likelihood of meeting National Air Quality Standards.

### **References:**

1. UK Air – Air Information Resource interactive map <https://uk-air.defra.gov.uk/data/gis-mapping/>
2. Stroud District Council, 2019 Air Quality Annual Status Report <https://www.stroud.gov.uk/environment/environmental-health/pollution-and-nuisance/air-quality>
3. Sustainability Appraisal of the Stroud District Local Plan Review – Draft Plan, November 2019, <https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/stroud-district-local-plan-review>

### **National Targets**

The UK government, based on EU requirements, has set limits for air pollution for a wide range of pollutants, covering gases such as NO<sub>2</sub>, heavy metals such as lead and particulates. The key pollutants which are measured at national and local level are NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>. The mean annual concentration limits are 40 µg/m<sup>3</sup> for NO<sub>2</sub> and PM<sub>10</sub> and 25 µg/m<sup>3</sup> for PM<sub>2.5</sub>. In addition, limits are set for one hour means.

### **Comments on references**

Reference 1 is an interactive map published by DEFRA, based on 2018 data. The map covers 1 km squares and gives concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> in the units required for comparison with the national limits.

Reference 2 is published by Stroud District Council and gives 2018 air quality data for the Stroud district. The Council deploys automatic instruments on two sites and non automatic instruments on 22 sites. The sites are mainly throughout the north of the district and four sites are reasonably close to the M5. The closest monitoring site to PS37 is site 37 near Westend Farm, Grove Lane, Westend and is approximately 150 metres from the M4 at Junction 13. Three other monitoring sites are reasonably close to the M5, site 31 at Upton St Leonards, site 33 at Hardwicke and site 35 at Haresfield.

### **Analysis of the data**

Analysis of the data from reference 1 for the PS37 site, gives the following results:

Mean annual concentration NO<sub>2</sub>, 12.23 µg/m<sup>3</sup>.

Mean annual concentration PM<sub>10</sub>, 15.04 µg/m<sup>3</sup>.

Mean annual concentration PM<sub>2.5</sub>, 9.33 µg/m<sup>3</sup>.

Analysis of the data from reference 2 for nearby locations gives the following results:

Site 37 mean annual concentration NO<sub>2</sub>, 20.34 µg/m<sup>3</sup>.

Site 31 mean annual concentration NO<sub>2</sub>, 22.52 µg/m<sup>3</sup>.

Site 33 mean annual concentration NO<sub>2</sub>, 32.83 µg/m<sup>3</sup>.

Site 35 mean annual concentration NO<sub>2</sub>, 21.35 µg/m<sup>3</sup>.

Unfortunately, relevant data from Reference 2 were not available for PM<sub>10</sub> and PM<sub>2.5</sub> as the two automated instrument sites were too far away from the PS37 site to be useful.

One hour mean data is not available but based on the annual means found, it is likely that the limits would be met.

### **Observations**

Current on site measurements for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentration levels are not available for the PS37 site but available data shows, with a low degree of confidence, that current limits for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentration levels are probably not exceeded.

The South of site PS37 is of particular concern because of the elevated nature of the M5 at this point. NO<sub>2</sub> is denser than air (1.83 vs. 1.0) and will tend to concentrate in this area of PS37.

Increased volume of traffic on the M5, A38 and A4135 are inevitable due to the development of site PS37 and future developments in Cam and Sharpness, leading to increased levels of pollutants. Queuing traffic at future roundabouts and traffic lights will also add to the problem. This view is supported by Reference 3, page 104, paragraph 5.27, which states: '*significant negative effect is expected for draft site allocation PS37 in relation to SA objective 10: air quality.*'.

SDC Core Policy CP14 states: '*No unacceptable levels of air, noise, water, light or soil pollution or exposure to unacceptable risk from existing or potential sources of pollution.*'.

SDC Core Policy ES3 states: '*Permission will not be granted to any development which would be likely to lead to, or result in an unacceptable level of:*  
*2. ...environmental pollution to water, land or air...*'.

SDC Core Policy ES5 states: '*Development proposals which by virtue of their scale, nature or location are likely to exacerbate existing areas of poorer or marginal air quality, will need to demonstrate (potentially by provision of a formal air quality assessment) that effective measures can be taken to mitigate emission levels in order to protect public health and wellbeing, environmental quality and amenity. Mitigation measures should demonstrate how they will make a positive contribution to the aims of any locally agreed air quality and/or transport strategies for Stroud District...*'.

SDC SA 10.1 states: '*Does the Plan avoid, minimise and mitigate the effects of poor air quality.*'.

As shown above air quality would be adversely affected by the development of site PS37 and may exceed national limits, mitigation measures are not specified and hence development of site PS37 would not meet the requirements of Core Policies CP14, ES3 and ES5 or SA objective 10

The effect of the increase in air pollution on the Natura 2000 site at Slimbridge, which is of world importance and less than 3 km from PS37, is unknown.

### **Conclusions**

Analysis of the referenced data for site PS37 shows that current data is sparse, and levels of air pollutants are not well quantified. Stroud District Council's own analysis for the development of site PS37 shows a significant negative effect on air quality. Core Policies CP14, ES3 and ES5 and SA objective 10 would not be met. Also, the effects on wildlife at a site of world importance are unknown. Therefore, site PS37 is not suitable for development because of its effect on air quality.

## **NOISE POLLUTION**

### **References**

1. Reference 7952/PR/BL, dated October 2019
2. BS 8233:2014, Design criteria for external noise
3. Review of EIS Application 2018/0758/EIAS
4. Auditory and non-auditory effects of noise on health, Basner et.al., *The Lancet*, Volume 383, Issue 9925, 12–18 April 2014, Pages 1270
5. Does noise affect learning? A short review on noise effects on cognitive performance in children, Maria Klatte, Kirstin Bergström and Thomas Lachmann , *Front. Psychol.*, 30 August 2013

### **Background**

Reference 1 is a noise impact assessment and environmental noise survey carried out on behalf of the ECT and GCC at proposed site PS37.

The main sources of noise were assessed as road traffic noise, railway noise and commercial noise. The survey was carried out to the appropriate standards using correctly calibrated equipment at six locations on the site.

Very high levels of noise were observed on the site caused by road traffic, reaching a maximum of 88 dB(A). Passing trains reached a similar level. Noise from the industrial site at Rocket Rentals was also observed to be high.

Modelling using the results obtained showed that the majority of the site had transport daytime equivalent noise levels of >65 dB LAeq (16 hour), night-time equivalent noise levels >60 LAeq(8 hour) and night-time maximum noise levels >75 dB LAFmax. This implies that in order to meet the required standard for internal noise the walls and roof can be of a conventional construction with double glazed windows and attenuated ventilation in the form of upgraded acoustic trickle vents or a mechanical ventilation system. Windows may be opened for ventilation, but for noise control should be sealed airtight to control external noise. The modelling also showed that, assuming buildings are placed along the boundaries and other measures implemented, the area exceeding the values shown above could be reduced. However, significant areas of the site would still have daytime equivalent noise levels of between 50-65 dB LAeq (16 hour), night-time equivalent noise levels of between 45-60 dB LAeq(8 hour) and night-time maximum noise levels of between 60-75 dB LAFmax.

Noise from the industrial site, Rocket Rentals was also shown to be a problem which would affect most of the Southern section of the site.

Reference 2, section 7.7.3.2 states: *'For traditional external areas that are used for amenity space, such as gardens and patios, it is desirable that the external noise level does not exceed 50 dB LAeq,T, with an upper guideline value of 55 dB LAeq,T .*

Reference 1 concludes that internal noise levels could be generally within the British Standard 8233:2104 criteria and *'the layout of the site is not known, however, the modelling indicates that with a carefully designed layout (which includes gardens facing away from the noise sources), acceptable external amenity space levels can be achieved across the site.'*



## Observations

It should be noted that measurements in dB are not linear and, for example, each 3 dB added doubles the sound energy and when 10 dB is added, the energy is increased ten-fold, while adding 20 dB is a hundred-fold increase.

Despite the conclusions in Reference 1, it is doubtful that the site could meet the permitted noise levels in Reference 2 for external areas. Reference 1 shows that, for significant areas of the site, daytime equivalent noise levels of up to 65 dB LAeq(16 hour), night-time equivalent noise levels of up to 60 dB LAeq(8 hour) and night-time maximum noise levels of up to 75 dB LAFmax. would be present. These noise levels exceed the permitted noise levels in BS8233:2014 for external areas.

Hardwicke Parish Council in their comments on Reference 3, regarding noise problems at Hunts Grove, noted that '*... a number of mitigation options that could be incorporated to try and achieve the 50 dB (LAeq, T) external noise level. However, the results of the modelling demonstrated that there are no practicable mitigation options available to achieve the 50 dB (LAeq, T) external noise level, but that it would be possible achieve 55 dB (LAeq, T) in all but 7 of the plots. These plots would experience levels of between 55 dB (LAeq, T) and 58 dB (LAeq, T)*'.

The noise levels are already very high and can only get worse because of the increased traffic density caused by the plans for housing and industrial development at PS37 and development of the Cam and Sharpness sites.

SDC Core Policy CP14 states: '*No unacceptable levels of air, noise, water, light or soil pollution or exposure to unacceptable risk from existing or potential sources of pollution*'. Site PS37 would suffer from levels of noise pollution which are unacceptable and exceed the requirements of BS8233:2014 and hence do not meet the requirements of Core Policy CP14

SDC Core Policy ES3 states: '*Permission will not be granted to any development which would be likely to lead to, or result in an unacceptable level of:*

*1. noise, general disturbance ...'*

Site PS37 would not meet the requirements of Core Policy ES3.

SDC SA5.1 state: *SA 5.1: 'Does the Plan help to improve residential amenity (including potential to reduce light, smell and noise pollution) and sense of place?' The plan for site PS37 will not help to reduce noise pollution.*

Warmer summers due to climate change are becoming more common and will result in residents keeping windows open at night to reduce internal temperatures. Given the ambient noise levels a good nights sleep would be most unlikely.

Noise pollution is acknowledged by many studies to cause a number of serious health and behavioural problems (See for example reference 4). Noise pollution is of particular concern in the case of children where noise pollution can have serious adverse effects on learning (see for example the review at reference 5).

## Conclusion

The results from Reference 1, previous experience at Hunts Grove, medical and educational studies and failure to meet the requirements of SDC Core Policies CP14 and ES3 and SA Objective 5, clearly demonstrate the unsuitability of proposed site PS37 for a new community.

## HERITAGE

Slimbridge parish, of which Cambridge and Wisloe are part, has long been recognised as having had a Roman presence, however, this has only recently been recognised as having far more significance than was previously known.

### **A little history**

*The Slimbridge Village Design Statement, December 2016 at 2.2 Historical Development states:*

*Some evidence exists to show that there was Roman occupation in Slimbridge. An example of this is the remains found in the field to the East of Lane's End Bungalow opposite the end of Gossington Lane. This was probably a resting area for travellers between Aust and Gloucester or Cirencester. Another Roman feature discovered is a ford across the River Cam at Old Ford Farmhouse.*

*There is a strong case for stating that the Vikings had a camp, possibly on the River Cam, when they made a major assault up the River Severn to the Midlands.*

The evidence of Roman occupation mentioned above, refers to a one-day field walk in 2001 when 387 sherds and a coin of Roman origin were found including building fragments and hypocaust tile used in the heating systems of Roman buildings. The full report was published in *Glevensis*, the journal of the Gloucestershire Archaeology Society. The significance of the finds is that they indicate that there was almost certainly at least one Roman building on the site. The A38 being acknowledged as the course of the Roman road this was hardly surprising. The chairman of the Slimbridge Local History Society at the time, Peter Ballard, was given permission by the tenant to simply walk the field again after 2001 and the attached photographs show further sherds which he recovered after the field walk. Amongst the sherds recovered there is clear evidence of the presence of a building or buildings on the site.

What is surprising is what has happened over the last two years.

### **Recent discoveries**

In the summer of 2017 permission was given for a detectorist rally on land behind Lancelot Close just north and west of the church. To everyone's surprise literally hundreds of Roman coins, brooches and artefacts were found. The detectorists were given permission to conduct three more rallies at other sites in the parish before it was realised that they were simply looting most of what was being found. The location of the finds was not being recorded and the vast majority were never seen again.

The rallies were stopped and, with the kind permission of the tenant and the landowner, Berkeley Estate, the Slimbridge Local History Society (SLHS) began coordinating a project to geophysically scan and systematically metal detect three fields in the parish. It soon became apparent that not only was there a significant Roman presence in the parish but also an Iron/Bronze Age settlement on the Lighten Brook. Hundreds of Roman coins and artefacts from around the second to third century AD have been recovered along with a whole range of items associated with Roman settlement and also a small number of Iron/Bronze Age coins. A Romano British double-ditch enclosure was found in Lynch Field close to Rectory Farm along with signs of an Iron/Age roundhouse next to Lighten Brook on Lightenbrook Lane.

All the finds were carefully mapped and shared with Kurt Adams the Gloucestershire and Avon Finds Liaison Officer based at Bristol City Museum & Art Gallery. Geophysical scanning was conducted by Tony Roberts of Archeoscan. Members of SLHS provided field support to the scanning and an educational programme was started by the society with local schools and

information shared with the local community. Tony Roberts' report is available from the Gloucestershire County Council (GCC) Heritage Team.

### **Possible Unexploded WWII Munitions**

One elderly resident recalls a German bomber dumping its bombs just off Dursley Road. He was in one of the six houses nearest the M5 and was sheltering under a table in one of the houses when the bombs were dropped, blowing out the windows of the houses. He recalls playing in the bomb craters but, given the overgrown nature of the soft ground at the time, he can't be sure that all the bombs exploded. He would be willing to pinpoint the location if asked.

### **Significance of the Discoveries**

The significance of the two discoveries, Lanes End Bungalow field and Lynch field, is that they are linked by Lightenbrook. Firstly, the brook would have been crossed by the Roman Road. Secondly, the gravel bed would have provided high quality drinking water for travellers and those living in Lynch field and, lastly, the brook would have given access to the River Severn. This almost certainly shows settlement occupation stretching between at least Lanes End Bungalow field on the Roman road and a settlement on what would have then been the banks of the River Severn and may well extend over all the land earmarked for development. The view that there is a larger archaeological landscape is enforced by aerial photographs showing distinct and as yet unexplored cropmarks in fields behind Tynning Crescent which would link the two sites. This is a far larger and more significant settlement than was previously recognised.

It also seems quite possible that this was also the site of a road junction leading not only to the Roman town of Corinium, present day Cirencester, but also the River Severn. Slimbridge would have been pretty much equidistant to all three major Roman towns, Bristol, Gloucester and Cirencester, and therefore a logical place for the interchange of materials and people. You could view this settlement area as a military and civilian settlement at a crossroads which formed a vital, major location for trade, manufacturing and the import of goods from across the Roman Empire. If this so, this would be an unprecedented discovery in the Severn Vale.

### **Heritage Assessment**

The heritage assessment conducted by Cotswold Archaeology on behalf of GCC and the ECT is accurate as far as it goes. What it does not include is the report on geophysical scanning prepared by Archeoscan on December 2019 as it was not available at the time the report was written. The sheer scale of the size of the previously unknown settlement and the enormous number of finds of Roman and Bronze/Iron Age artefacts clearly indicates prolonged settlement in the area. It is incomprehensible not to link this settlement with the finds of the same period at the development site. This is supported by aerial photographs of cropmarks between the two sites. The previous theories of a staging post at Lanes End Bungalow have been misleading. The current evidence demonstrates the presence of a major settlement close to the Roman Road on the course of the A38.

### **Next Steps**

Before any development work is even considered the whole site needs to be thoroughly geophysically scanned and metal detected. This is far more than just an inappropriate place to build 1500 houses. This is our community's heritage and conserving, understanding and enjoying what was here nearly 2000 years ago is far more important than making a fast buck building house. A view I would expect the trustees of the ECT to hold close to their hearts now that they are fully appraised of these discoveries. It is, after all, just what their founder set out to achieve and is their duty as trustees to see his wishes fulfilled. A unique opportunity exists to educate local children and the community at large and this is something which once again I would expect ECT and even the GCC to recognize and encourage. This is work that SLHS with its limited resources has already started and wishes to continue for years to come. We would welcome support from ECT and GCC.

### **Desired outcome**

From an archaeological viewpoint alone, this development should not go ahead.

Regardless of whether evidence of Roman or Iron/Bronze Age buildings are found it would be insensitive at least for SDC, which frequently espouses its views on the environment and the rich culture of this part of the English countryside, to ignore and desecrate a site which has remained untouched for thousands of years.

The GCC Heritage Team are encouraged to conduct a full geophysical scan of the entire site, supported by metal detection, to further establish the importance of this community's heritage.

### **Roman sherds recovered from the site**









## **IDENTIFYING SUITABLE ALTERNATIVE SITES**

This section addresses specific aspects relating to the need to identify suitable alternative sites in preference to the proposed site within the parish of Slimbridge.

### **Timing**

The development within the parish of Slimbridge was not included within the original submission of the Local Plan or SALA 'Call for Sites' in 2016 or the 2017 update. It was only in the 2018 update that GCC and the ECT first submitted outline maps introducing Wisloe as a potential site for circa 1500 houses in total. The introduction of the Wisloe proposal part way through the Local Plan cycle has resulted in insufficient remaining time being available to undertake a meaningful analysis of all the alternative sites in the district. Furthermore, by the time the Wisloe site was initially proposed in 2018 numerous alternative sites had been proposed and discounted from the Local Plan. These previously discounted sites were assessed prior to the 40% increase in Government requirement being introduced in 2018. Therefore, those proposals previously discounted prior to the 2018 requirement increase should be re-evaluated in light of the more stringent demands for additional housing.

### **Size**

The combined area for the Wisloe site is approximately 75 ha of which 75% (56 ha) is suitable for house building. Finding an alternative site elsewhere in the district for such a large proposal is not appropriate. The approach to identify alternative sites, up to say 50 houses, is appropriate for much smaller developments but the options for larger sites diminish rapidly with increase in size. The most suitable alternative to a large site of Wisloe's magnitude is therefore to distribute housing around other much smaller sites within the district (dispersal). It is considered inappropriate to apply the rule that alternative sites need to be identified for extremely large sites, like Wisloe, instead it is proposed that examples for alternative sites only need be identified. There remains an overarching requirement on SDC to find suitable alternative sites to deliver the total housing demand compliant with its own guidelines.

*Sustainability Appraisal Report for the Stroud Draft Local Plan 2019 poses the questions:*

*SA 13.1: Does the Plan encourage the appropriate provision of housing development on previously developed land as opposed to greenfield sites?*

*SA 13.2: Does the Plan maximise the provision of employment development on previously developed land as opposed to greenfield sites?*

*SA 13.3: Does the Plan encourage housing densities which would make efficient use of land?*

*SA 13.4: Does the Plan ensure land is remediated where appropriate?*

*SA 13.5: Does the Plan reduce the loss of soil and high grade agricultural land to development?*

The proposed development in Slimbridge Parish fails to meet these criteria.

### **More Equitable Distribution**

Page 39 of the Nov 2018 Local Plan identifies Stroud District as having the following settlement structure; 4 in Tier 1, 5 in Tier 2, 12 in Tier 3a, 11 (including Slimbridge) in Tier 3b, 5 in Tier 4 and 16 (including Cambridge) in Tier 5. A more equitable additional housing allocation is shown below.

Stroud District Settlement Distribution (Nov 2018)			
Tier	No of settlements	Proposed Equitable Housing allocation	Total
1	4	1500	6000
2	5	600	3000
3a	12	200	2400
3b	11	100	1100
4	5	50	250
5	16	25	400
		Sum total	13150

This more equitable distribution (dispersal) achieves the target housing requirement of 12760 over the next 20 years. Using this allocation Slimbridge will have to find the sites for 100 houses and Cambridge will have to accommodate 25 houses, which is far preferable to the 1500 dwellings planned for Wisloe. The other larger Tier 1 and 2 settlements will have to take their 'fair share' of additional housing to reflect their size within the district. An example of a suitable site within the Slimbridge parish is the proposal for 50 houses behind Tynning Crescent (ref SLI003). This proposal would not generate any of the major issues associated with the Wisloe proposal and would undoubtedly be fully supported by the parish. This proposal would be fully in-keeping with maintaining the village identity and would also avoid coalescence. It would also be feasible for some of the previously developed brown field land proposed for the Wisloe development to be used to help achieve this revised requirement. For example, the GCC owned land near the stables at Wisloe would be a suitable site for circa 75-100 houses and would not really impact Slimbridge or Cambridge. This would fulfil the proposed total village allocation for the next 20-years and avoid coalescence.

Any significant housing development identified, which is more compliant with the Local Plan policies e.g. nearer to M5 junction and employment on a brown field site etc, could be included within the Local Plan to help offset some of the more challenging allocations above. Significant development proposals in the areas of Moreton Valence and Standish have previously been proposed and discounted, these should be reassessed. There is also a current proposal to redevelop the site at the old Standish Hospital (150 dwellings). This brownfield site should be developed in preference to a green field site, particularly as it is close to employment, services and road networks.

To achieve this more equitable housing allocation it is proposed that a full review be conducted of all development sites (both accepted and rejected) in light of the 2018 Government increase which was introduced part way through the Local Plan cycle.

This approach would assist SDC to achieve its own NPPF target that at least 20% of the sites allocated for housing through the Local Plan should be half a hectare or smaller.

This appears not to be the case overall and is certainly not the case since the 40% increase requirement was introduced part way through the planning cycle which has majored all additional development on Wisloe/Cam and Sharpness.

### **Consistency**

An analysis of the SALA Appendix 4 (site rejections) data has been undertaken, the results are shown below.



Reasons for Rejection	Beyond T123, not assessed	Double counting	Active use, not available, community asset	Narrowing gap, coalescence, loss of green buffer	Loss of view, visible	Setting of village, lanscape sensitivity	Rural character	Harm to local heritage	Hilly	Listed buildings	Extension into countryside	Lack of facilities & infrastructure	Wildlife site	Flood risk	Lack of employment	Outside settlement boundary	Relates to another proposal	Access	Too small	Archaeology	AONB	Total
2017	22	11	26	29	14	8	11	8	16	6	2	2	6	13	0	16	0	6	4	1	30	231
2018	3	1	1	7	6	2	5	7	2	3	1	2	2	1	1	1	0	0	0	0	0	45
2019	4	0	1	12	6	1	6	3	1	9	4	1	0	1	0	4	1	0	0	0	10	64
Total	29	12	28	48	26	11	22	18	19	18	7	5	8	15	1	21	1	6	4	1	40	340

Grey = discounted, green= equally applicable to Wisloe, yellow= not applicable to Wisloe.

Of the 237 rejections 175 (74%) were rejected before the increased governmental targets were introduced. Of the general reasons for rejections (multiple/rejection) 74% are considered equally applicable to the proposed Wisloe development. The two main reasons for rejection which would not apply to the Wisloe proposal are AONB and a hilly topography. It appears a large proportion of the AONB rejections were for the Stroud area despite Stroud being a Tier 1 town. Stroud needs to take its 'fair share' of new housing as it is the largest town in the district, despite it being in the AONB region. The data suggests a lack of consistency in application of the reasons for rejection, this needs to be applied in an even-handed manner. If the Slimbridge site were to remain a viable option in the Local Plan, then the same rules should be consistently applied to those proposals which have already been rejected from the Draft Local Plan.

## Summary

The WAG assessment of aspects relating to 'alternative sites' concludes the Slimbridge site proposal should be rejected on the grounds that:

- There is insufficient time to identify alternative sites as the Wisloe proposal was introduced part way through the planning process.
- It is not necessary or appropriate to identify alternative sites for 1500 houses due to the very large size of the Wisloe proposal. Identification of alternative sites is only an appropriate requirement for much smaller proposals.
- A more equitable additional housing requirement can be achieved by dispersing the housing requirement around the district. There are numerous alternative smaller sites which have been previously rejected, many before the governmental increase was introduced in 2018, which could help achieve the total housing requirement.
- SDC appears to have not applied its own planning decisions in a consistent manner, previously rejected sites should be reassessed to identify opportunities to help spread the housing requirement load more equitably across the district (dispersal).

## **WATER QUALITY**

There are well known issues with the quality of the drinking water within Slimbridge Parish and the Sustainability Appraisal Report identifies that Drinking Water Safeguarding Zones are present in the River Cam and the surrounding areas.

*Sustainability Appraisal Report for the Stroud Draft Local Plan 2019:*

*SA 11: To maintain and enhance the quality of ground and surface waters and to achieve sustainable water resources management in the District.*

*SA 11.3: Does the Plan minimise inappropriate development in Nitrate Vulnerable Zones, Drinking Water Safeguard Zones and Source Protection Zones?*

**The answer is no because the report very worryingly goes on to states the following: -**

***4.68 Drinking Water Safeguarding Zones are present in the District around Cam where a high level of strategic growth is to be accommodated. A high level of growth in this area could adversely impact water quality in the area.***

***5.28 Only the new settlement at Wisloe is expected to have an adverse impact on water quality in the District given that it lies within an SPZ. As such a significant negative effect is expected in relation to SA objective 11:***

### **Conclusion**

It is clear that there SDC and the developers are aware of a with water quality problem for the Proposed development within Slimbridge Parish. The residents of Slimbridge Parish are very concerned about this particularly when considering the total growth of over 4000 homes between Slimbridge and Cam Parishes in a Drinking Water Safeguarding Zone.

## **EXECUTIVE SUMMARY**

The Wisloe Action Group has objectively assessed the Stroud District Local Plan Review, Draft Plan for Consultation, November 2019, with particular emphasis on the PS37, Wisloe Garden Village proposal.

The Group has revealed numerous shortfalls in planning, contraventions of sustainability principles, misleading and incomplete supporting assessments, all of which are set out above.

It seems the opportunity to achieve a quick win on planned government targets was too much of a temptation and has resulted in a rushed and ill-thought-out proposal.

This proposed settlement dwarfs its parent parish. The proposal quadruples the population and housing stock of Slimbridge by imposing a dormitory settlement offering no benefits and countless drawbacks.

The Ernest Cook Trust, Gloucestershire County Council and Stroud District Council are all prepared to turn a blind eye to their espoused principles of community, sustainability and preservation of the countryside to force through this proposal.

Ernest Cook, founder of his trust, would be horrified to know that his precious country estate was to be exploited in such a fashion for financial gain.

Stroud District Council planning department would have us believe they can find no alternative which does not speak well of its capabilities.

We find it hard to envisage how prospective buyers could possibly buy the garden village description when they are hemmed in by the M5, A38, A4135, a major railway line and find their homes are under pinned and bisected by a high-pressure gas pipeline. Their place of work, their children's schooling and their services and facilities will prove inadequate and generate many miles of car driving, and the resulting pollution, to reach.

Wisloe Garden Village, a misleading description if there ever was one, should be rejected by our elected representatives in order to preserve the reputation of their district.

## **No to Wisloe Village**

