



# The countryside charity Gloucestershire

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## **Stroud District Council Local Plan Review November 2019 edition**

### **Stroud and Berkeley Vale Districts of CPRE Gloucestershire comments**

Members of the Berkeley Vale District of CPRE Gloucestershire have discussed the latest Review and comment as follows:

We are grateful for the time members of Stroud District Council (SDC) staff have taken to discuss this with us.

#### **General Points**

1. We are supposed to be becoming a carbon neutral economy. This requires significant changes in lifestyle including reduced use of cars and growing more of our own food. The Severn Vale is an area of good, productive farm land. Unfortunately it is relatively flat which makes it an easy target for housing development in spite of many areas being liable to flooding. It has major lines of communication north-south which makes it even more attractive to developers. The River Severn is a spectacular, dangerous river. The Vale is not in the AONB but when viewed from the AONB or the Forest of Dean it is attractive, undulating farmland crisscrossed with hedges. We are now allowed by the planning system to promote 'beauty' as a requirement of our environment. We all should remember this. The beauty of the Vale is one of the reasons so many people wish to live here – we must protect this beauty.
2. We understand that SDC is required to build 638 homes for each of the next 20 years. We suspect this may be an unnecessarily high number as we do not know yet what effect leaving the European Union will have on net immigration.
3. We are very concerned that the scale of the proposed developments will swamp the current infrastructure. Experience has shown that improvements to infrastructure are implemented very slowly, usually around half way through a project, rather than at the outset of a project which exacerbates its effect on the local community.
4. We are pleased to note that Core Policy CP6 requires additional CIL contributions from a developer to mitigate effects on infrastructure beyond the development and that these

can be pooled with those of other developers to deal with an overall community infrastructure impact.

5. Drainage - This particularly applies to drainage both of surface water and sewage. SUDS on ground already saturated by heavy rainfall and/or waterways flooding do not deal with the problem. Most of the smaller villages have linked drainage systems, e.g. Whitminster and Frampton on Severn. This is relevant to proposed developments at Wisloe and Sharpness garden village.
6. The current motorway junctions are at over capacity during morning and evening commuting time. Traffic diverted by an accident on the M5 to the A38 rapidly seizes up.
7. The Sharpness bypass is still incomplete and the B4066 through Mobley is too narrow for the size of lorries using it. The junctions north and south from the B4066 on to the A38 cannot take more traffic. This should be dealt with before any development starts in Sharpness.
8. The railway system currently does not have enough capacity to cope with the proposed developments. The station platforms at Stonehouse and Cam and Dursley are too short for longer trains.

We understand that under the MetroWest project a half hourly train service is envisaged between Gloucester and Bristol and that this has been agreed in principle. We also understand that there is a feasibility study by WECA on reopening Charfield station. We consider that it is essential also to reopen Stonehouse Bristol Road station. Alternatively, consideration could be given to providing a new Stonehouse station accessing both the London and Bristol lines via the B4008 near the Horsemarling Lane roundabout where there is currently a foot tunnel under the railway lines and space for parking. This location could also be accessed by an extension of Oldends Lane. Access from the west by bike and foot would benefit the Great Oldbury site and the proposed Site PS19a Northwest of Stonehouse. If walking and cycling are to be promoted in Stonehouse the railway level crossing at Oldends Lane should have a pedestrian/cycle bridge over it. A major factor in encouraging rail travel is station parking and this needs to be addressed at an early point.

The following rail station usage figures have just been issued by the Office of Rail and Road and reinforce the need for provision of longer platforms, parking and expansion of services:

Cam & Dursley - Entries & Exits	191,426	1.3% increase on 2018
Stonehouse	166,144	8.2% "
Stroud	561,892	3.2% "

9. Some of these infrastructure problems arise from siting developments too far from centres of employment. The Berkeley Sharpness Garden Village site is at the maximum distance from all large centres of employment in the county inevitably making driving the preferred means of transport. There is a cautionary lesson to be learned from the

development of Portsmouth to provide housing for people working in Southampton. The two towns are linked by the M27. During commuting hours this motorway is now jammed solid with traffic and it takes 2 hours to do a 35 minute drive. This could easily happen on the M5 going into Bristol. Infrastructure needs to be planned regionally not local council by local council. Junction 14 on the M5 is a case in point.

## 10. Design of buildings:

- a. We understand that both Wisloe and Sharpness Garden Village are intended to be exemplars of excellence of planning and design. If these large developments are carried out by the usual large building companies how is the Council going to enforce this ambition for excellent design? (Point 22 page 17) The companies are likely to use their in-house designers and there will be the usual boring lego houses such as is the case with the very poorly designed houses on Canonbury Rise, Berkeley. These are a testament to cheap mass produced design by a profit seeking developer. SDC could take note of the development of Nansledon, Newquay, where houses are not jammed together and even the social housing units have space around them. SDC could emulate Norwich City Council and hold an architectural competition to design various types of mixed housing that are visually appealing, comfortable to live in, energy efficient and have sufficient accessible outdoor space for the less mobile and for families to run around safely. Perhaps G First LEP could sponsor this?
- b. Stroud District Council should insist that all new building, including industrial and agricultural, should incorporate solar panels in roofing. The price of solar panels is coming down and if purchased in bulk by a developer would be lower still – so cost should be no excuse.
- c. If homes are sited at significant distances from places of employment all adult occupants will need cars or motor bikes to get to work. Space must be made by, or under, each home for a minimum of 2 cars to be parked **off road**. Current developments do not provide roads that are wide enough to allow parking on both sides and the minor estate roads become too narrow with parked cars and so dangerous to pedestrians and cyclists. New estates on the continent have much wider roads with off road parking for two cars – we should emulate this.
- d. Provision should be made for wildlife to travel through new developments with permeable fencing and underpass tunnels for main roads – See Point 11.

## 11. Building with Nature

Gloucestershire Wildlife Trust are promoting this and other Local Councils in Gloucestershire are including provision for this. SDC as yet have made no mention of it. We quote below Gloucester City's Policy and urge SDC to include a similar policy.

Publication: Pre-Submission Gloucester City Plan

Actions

**Pre-Submission City Plan**

## Policy E5: Green Infrastructure: Building with Nature

**Development must contribute towards the provision, protection and enhancement of Gloucester's Green Infrastructure Network. Contributions should be appropriate and commensurate to the proposal. Major development proposals will be designed in accordance with 'Building with Nature' standards.**

3.5.21 JCS Policy INF3 and the associated JCS Green Infrastructure Plan (GIP) seek to connect the urban areas of Gloucester with the high-quality Green Infrastructure (GI) assets of the Cotswold's AONB and the Severn Vale. GI and its associated corridors and links are a vital component of maintaining and enhancing health and wellbeing. It also has functions regarding biodiversity, connecting the ecological network, surface water management, climate change adaptation and amenity value. Importantly, it also contributes to mitigating recreational impacts on European designated sites, including Cotswold Beechwoods.

3.5.22 Development should contribute towards this objective, and to the broader network of GI corridors and assets across the city using SuDS, open space, green roofs and walls and tree planting.

3.5.23 Development has the potential to block corridors resulting in the isolation of habitats from the ecological network which is a concern in an urban area such as Gloucester. The rivers, brooks, disused railway corridors, footpaths and open spaces form important corridors linking communities within the city and habitats to the wider countryside. These vital corridors need to be protected and where possible enhanced for their biodiversity value and as pedestrian/cycle routes through the city.

3.5.24 'Building with Nature' was developed by the Gloucestershire Wildlife Trust in partnership with the University of the West of England and MHCLG. It promotes a new benchmark for the design and maintenance of green infrastructure in housing and commercial development. Further information on Building with Nature is available at [www.buildingswithnature.org.uk](http://www.buildingswithnature.org.uk).

3.5.25 For major developments, the Council will expect developers to use 'Building with Nature' standards to inform development. Compliance should be demonstrated through the Design and Access Statement and/or a site-based green infrastructure strategy.

### Proposed Development Sites

#### Stonehouse

PS17 – we are pleased to see that a site for a pedestrian footbridge at the Oldends Lane level crossing is being protected. It is essential that this bridge is constructed quickly to protect pedestrian and cycle access to the centre of Stonehouse.

PS19a – we hope this is the end of expansion to the north west of Stonehouse. Sufficient trees should be planted in the landscaping section to absorb effectively the noise and fumes of the diesel trains on the adjacent railway.

As noted above consideration should be given to the construction of a new Stonehouse station and associated parking which assesses both the London/Gloucester and Bristol/Gloucester lines. A potential site is the existing railway underpass west of the Horsemarling Lane roundabout. Additionally it could be accessed on the west side of the Bristol Gloucester line by extending Oldends Lane to this point.

PS20 – This is a very large green field development beside Junc 13 on the M5 to include employment land, a football stadium and improvements to the Stroudwater canal.

We consider that development in the Southwest block is undesirable. It is in Eastington Parish (Tier 3A accessible with limited facilities). Eastington does not need industrial development of this size. It is in a flood zone. If development is permitted here at least half of the south west block should be strategic landscaping and water meadow to mitigate flooding. The south east end of the block should have thick screening of trees to absorb exhaust fumes and noise.

We consider that the proposed stadium on the north side is unnecessary and will impact adversely on Nailsworth's economy, also on the tranquillity of Eastington, Westend, Nupend and Great Oldbury.

Forest Green Rangers has a large number of supporters in Nailsworth and that is where it should stay in its existing excellent stadium where local people can walk to it. In its proposed new location it would not bring business to Stonehouse as it is too far to walk from the site to the town and it would take business away from Nailsworth. Eastington, Westend, Nupend and Great Oldbury would also be affected by stadium noise and traffic.

Great care and consideration should be given to the protection of William Morris College, a charitable enterprise, which was established in an accessible area of tranquillity to support vulnerable young adults who need quietness to thrive. No substantial financial settlement has been offered or made to allow the college to relocate to a quieter place. The noise surveys conducted on previous planning applications for this site are unconvincing.

If employment facilities in the NE block are permitted, great care must be given to site access from and to the A419. The south eastern end of the block should have thick screening of trees to absorb exhaust fumes and noise and protect residential areas to the east and north.

### **Cam and Dursley**

Cam and Dursley station is a victim of its own success. It does not have enough parking and rail use is likely to be suppressed as a result. Box Road is too narrow to park along and the bus connection to the station is frequently seriously held up by badly parked cars and must cause passengers to miss the train connection. Much more parking is needed possibly with pedestrian/cycle access from the west.

#### **Cam:**

PS24 – the map on Page 95 in the Nov 2019 edition of the Local Plan Review is inaccurate as permission has now been given for continuous development along the length of the NW of Box Lane as far as Cam and Dursley Station. A small provision has been made for extra parking in the development next to the station car park but this is unlikely to be sufficient to resolve the issue of inadequate car parking provision at the station (see above).

700 houses is a huge development for Cam on top of all the additional housing along Box Lane. The proposed layout does not appear to show much effort to coalesce these two developments, particularly as it is intended to include a new primary school and community uses. Cam's current primary school is too far to walk from the Box Lane developments. The northern block is not easily connected to the larger southern block and it will be difficult to grow a community in this area. Care must be taken not to make a dormitory for a lot of isolated commuters.

Care must also be taken to ensure that the heights of buildings do not obscure sight of Slimbridge's iconic church spire which can be seen for miles in the flat land of the Vale. Care must also be taken to break up the roofscape of this development with trees as it will be highly visible from the AONB. This point was also made by Cotswold Conservation Board about the blocks of development to the NE of Box Road.

PS25 – 180 houses

The points raised for PS24 apply to this development, particularly about breaking the roof lines with tree planting to improve the view from the AONB.

Progress on the proposed cycle track from Cam to Dursley would be welcome. We assume this will connect with the supermarket and surgeries.

### **Dursley**

PS28 – This is a logical place for development but it hosts a badger sett and had access problems.

### **Hardwicke and Hunts Grove**

PS32 – we hope that a significant buffer zone will be created to maintain clear separation of Haresfield from Quedgeley East with visual definition – perhaps a line of oak or other hardwood trees (not ash)

PS43 – Javelin Park – employment site. It is to be hoped that the waste heat discharged into the atmosphere by the incinerator will be harnessed to heat greenhouses and other activities requiring heat/hot water. We realise that the heat is also being used to generate electricity but this is only a 30% efficient use so 70% of the heat is discharged unused. Holland runs very efficient agricultural operations on this type of heat waste. We should do so too.

G1 – South of Hardwicke – this would appear to be a suitable site for development if enough space is left for water dispersal – this is a poorly-drained part of the county.

### **Waddon**

G2 – this is a marshy area in the flood plain, close to the AONB and visible from it and from Robinswood hill. It has poor communications into Gloucester and is better left undeveloped. The M5 and the main line railway on the boundaries will be major constraints.

## Berkeley

Berkeley is an important tourist centre with castle visitors from all over the world bringing business to the town. It is important that the town remains attractive and welcoming.

PS33 - North West of Berkeley. This is a very wet area and development, if allowed, should only take place on the higher ground. Note should be taken of the aquifers which are causing subsidence problems at the new development, Canonbury Rise, Berkeley, on the other side of the ridge.

## PS36 Sharpness Garden Village

This is a major development which would completely change the Berkeley Vale. It is sited on good, productive agricultural land. CPRE is not enthusiastic about it and fears that the necessary infrastructure to make it work properly would not be put in place quickly enough. Before building commences the Sharpness bypass must be completed at the A38 junction. The road through Mobley is not wide enough and the right turn at the A38 is dangerous. The alternative junction at Heathfield is equally dangerous and the lane connecting it at Mobley is not suitable for heavy traffic.

We are concerned that the Sharpness Garden Village would become a dormitory settlement with people commuting north and south via the M5. M5 Junc 14 does not have the capacity for more commuting traffic and the entry points to Bristol are congested now in peak hours – see page 2. We note it is proposed to resurrect the Sharpness-Berkeley Road railway line with stations at Sharpness and Berkeley. This would only provide a connection north to Gloucester and Cheltenham with the possibility to change at Cam and Dursley for the Bristol direction, or at Berkeley Road, if this station were reopened. The line connecting the Sharpness line towards Bristol has been removed. This project would require immense pressure on MetroWest and substantial government funding contributions to get anything moving within any reasonable time frame.

People living in a country Garden Village will need cars, even if good public transport alternatives are provided. It is likely that each member of a household will need a car or motorbike to get to work. Provision will therefore have to be made for adequate **off road** parking – not the usual 1.5 cars per household. Basements could provide garaging and also protect against flooding. Estate roads are never wide enough for parking, buses, traffic, bicycles and pedestrians. The more generous provision in new European developments should be matched.

Phase 1 of the plan has made better provision for flood water and rain run off than earlier plans. The internationally important Slimbridge Wetland Centre is about a mile away. The SSSI extends down the mud flats of the River Severn as far as Thornbury. Has there been sufficient consultation with them and has enough space been allocated within the development area for migrating and grazing birds? Do the proposals fully take account of potential climate change and rise in levels of spring tides, also the increase in water coming down the Severn from Wales as a consequence of higher rainfall.

Given that the overall District housing requirement may change once we have left the European Union and the need to deliver for 638 homes per annum may decrease, it will be important that if this development goes ahead site remains attractive and it is built out in completed blocks rather leaving fields of mud with the grass stripped off and no building started. The community elements will need to be built early, rather than half way through, in order to foster the 'village' feeling.

**Design of buildings** – see General Comments Point 10

What financial inducements will SDC offer to encourage businesses to move to the Garden Village? To discourage out commuting there needs to be local employment.

**A Green Buffer** needs to be established between Sharpness and Wisloe. This would protect the internationally important SSSI and a very damp part of the Vale with its ridge and furrow fields and associated wildlife. It would also ensure that the two proposed 'Garden Villages' remain 'garden' and rural. We suggest this should run in a line from Purton – Halmore – A38 across to Shepherds Patch – Moor End – Gossington – A38. It would be good also to protect the land between Slimbridge and Frampton on Severn which would mean the SSSI is encircled.

The RAMSAR Integrated Framework and guidelines for avoiding, mitigating and compensating for wetland losses (Resolution XI.9, 2012) supports the proposal of a Green Buffer:

> 5. Article 4.2 states that if a Contracting Party invokes "its urgent national interest" to delete or restrict a Ramsar Site's boundaries, then "it should as far as possible compensate for any loss of wetland resources". Although the Convention contemplates compensation in such a scenario, **the overriding and primary duty (in light of Article 3 and the rarity with which Contracting Parties have formally invoked urgent national interest) is to maintain the ecological character of Ramsar Sites and avoid the need for compensation in the first place.**

This need for care applies to Sharpness village as well as the land around Slimbridge and Frampton on Severn.

### **Wisloe Garden Village 1,500 homes**

This is a green field development on good quality farmland – mainly Grades 2 and 3 by MAFF in 1983, and the south site Grades 2, 3a, 3b and 4 in 1997. As we need to grow more of our own food to reduce food miles to become carbon neutral this seems a bad site.

The proposed site would continue the development of Cam right to the A38 and north up the A38 to Cambridge. It would create a huge block of sprawl from the far side of Dursley to the A38 and when viewed from the AONB and the Cotswold Way will be very depressing. Great care must be taken to break up blocks of roofing with trees so that there is an overall green look when seen from above. (Cotswold Conservation Board)

This would be a regrettable development but does have better transport links than the proposed Garden Village at Sharpness.

We have strong reservations about the triangular patch of land to the south west, part Ernest Cook Estate and part Gloucestershire County Council owned farm land. It is a large area and will be the most visually intrusive when developed.

We think the most appropriate area for development is between the old Dursley Road and the A38 and that this should be developed first. A cycle track could connect this without difficulty to the Railway Station via the old Dursley Road and allow people to access the facilities in Cam, particularly the proposed primary school at Cam - PS24.

The block to the east of the old Dursley Road could be built out more slowly starting from the north corner next to Cambridge. The rest should be held in reserve depending on the evolving housing requirement. When this block is finally developed it would be useful to have a pedestrian/cycle bridge over the M5 connecting it to the station via a right of way through the field to the west of the station – which by then might have become parking.

### **Design of Buildings – See General Comments Point 10 & 11**

When planning the Garden Village, developers should remember that beauty is now a planning requirement and the layout and house design are required to take this into account.

Design should also optimise views of Slimbridge church's iconic spire which can be seen for miles in the Vale.

Provision should be made for wildlife to travel through new developments with permeable fencing and underpass tunnels for main roads.

**Impact on Slimbridge Wetland Centre** – SDC must be aware of the obligation to protect the International SSSI and the grazing grounds for geese around it. This would be preserved by the implementation of a buffer zone around it (see Sharpness Village page 8).

This need for care also applies to the land around Slimbridge and Frampton on Severn.

### **Employment**

What incentives will SDC offer prospective tenants of employment sites to move to Wisloe? Some of these sites should be workshop sites for 1 or 2 people and starter units for self employed people.

### **Parking and transport**

The same points apply as said above in relation to the Sharpness Garden Village. People living in a country Garden Village will need cars, even if good public transport alternatives are provided. It is likely that each member of a household will need a car or motorbike to get to work. Provision will therefore have to be made for adequate **off road** parking – not

the usual 1.5 cars per household. Basements could provide garaging and also protect against flooding. Estate roads are never wide enough for parking, buses, traffic, bicycles and pedestrians.

### **Frampton on Severn**

PS44 – Developments in Frampton on Severn are currently suffering flooding due to inadequacies in the drainage system. The drainage system in Frampton will obviously need to be enlarged to cope with current rainfall and loss of land now covered by housing to absorb it. These improvements will need to be in place before any more building begins.

### **Whitminster**

The Frome valley below Whitminster is a key wild life site and also part of the Industrial Heritage Zone because of the canal. The Heritage Zone becomes more important with the improvements to the Stroud Water Canal which allow greater travel on the canal. PS45 and PS46 have been put up for development many times before and have been turned down because of impact on the Frome Valley and pressure on the sewage system. Whitminster's sewage and drains all go to Frampton for treatment. Unless the sewage system has been enlarged there will still be this problem.

### **Kingswood**

This village has had a lot of development in the past 10 years and there is pressure on unallocated green field sites for still more housing.

The current impact of Renishaw TTW traffic in Wotton under Edge and Kingswood is severe and also affects air quality.

#### **PS46 – Land South of Wickwar Road**

This site has been available for some time. It has difficulties with access and drainage. School capacity is also a problem.

PS47 – Land west of Renishaw, New Mills on boarder with South Gloucestershire Council Renishaw is a major employer in the county.

This site is in addition to the current application S.18/2368 for office space with significant parking. South Gloucestershire Council has questioned the impact of travel to work (TTW) figures on Junc. 14 of the M5. Highways England recently confirmed that TTW figures should not impact Junc. 14 significantly.

Presumably the effect of TTW numbers will also be significant on this proposed large development – the area proposed for development is similar to the existing site at Renishaw New Mills. The site is in the flood zone and protection will be needed at the north end of the site. Also important is provision and promotion of public transport between Renishaw

sites and Wotton, Charfield, Yate and Dursley. Any building will undoubtedly include solar panels. New building heights should not dwarf the listed mill buildings. Charging points for electric cars should be mandatory.

## **Core Policies**

**We particularly welcome the changes to CP8, CP9, DHC2, DHC4 and DEI1**

### **CPRE Stroud: COMMENTS ON STROUD DISTRICT COUNCIL LOCAL PLAN REVIEW JANUARY 2020**

The Campaign to Protect Rural England (CPRE) Stroud district would like to raise objections to the revised version of the Stroud District Local Plan on the grounds of its inadequate protection of the Cotswold Area of Outstanding Natural Beauty (AONB).

The revised plan states in several places that its ability to develop sites in the Cotswold AONB is restricted by the statutory protection placed on land with this landscape designation. We are therefore excessively concerned that the proposed plan flouts this protection by allocating 80 houses in the AONB in a green field site outside the settlement boundary in Minchinhampton. The Minchinhampton site is the only development within the AONB in the whole of the proposed Local Plan. Stroud CPRE wishes to know why the Council has chosen to promote development on this site while avoiding others in the Cotswold AONB.

It is also unacceptable that the proposals include two sites adjacent to the AONB in Nailsworth since developments here would have a damaging impact on the AONB. Stroud CPRE refers you to the independent Glover Report (Department of Environment and Rural Affairs Landscapes Review). This report recommends strengthening the protection of AONBs and in the case of the Cotswolds elevating it to National Park status to give this area even greater protection. Neither the Minchinhampton nor the two Nailsworth site allocations accord with the spirit of the Landscapes Review.

Our opposition to these sites is also based on the inadequacy of the road system to cater for the additional traffic that would result from the developments. In the case of Minchinhampton, 60,000 cars a week already cross the neighbouring Minchinhampton and Rodborough Commons (an SSSI and part of the Cotswold Commons and Beechwoods National Nature Reserve). These commons host 500 free ranging cattle for six months of the year, and adding to this traffic burden is clearly irresponsible and threatens the future of this highly-valued landscape. Furthermore the town centres of Minchinhampton and Nailsworth are already suffocated by traffic; additional traffic caused by these developments would be intolerable.

CPRE strongly recommends that Stroud District Council reconsiders the Minchinhampton and Nailsworth sites and advocates their removal from the plan.

