

I do not support the local plan to meet the future housing growth of Stroud District and have the following comments to make regarding the proposed development at 'Wisloe Green'.

Development in Slimbridge /Cam& Dursley/Berkley

The proposals in the plan are to build over 6000 houses in Wisloe, Cam and Dursley and Berkeley . This represents 80% of the total requirement for Stroud District, all located in the south of the district.

SDC's Settlement Role and Functions Study in 2018 shows that the Berkeley Vale has the highest commuter miles of the district and the fewest jobs. Car use and ownership is the highest due to the lowest levels of amenities and infrastructure.

The majority of employment is in the north of the district and as such has the infrastructure to deal more effectively with increased number of developments

The favoured option of residents was dispersal rather than large settlements as infrastructure already exists around established centres .

This is a disproportionate spread of new development in the south of Stroud District given the current infrastructure in the area

Coalescence

As a result of these proposals Slimbridge and Cambridge will cease to be villages in their own right as the development will coalesce Slimbridge, Cambridge, Gossington and Wisloe into one large town . 1500 houses is more than all three villages combined and will overwhelm them and strip them of their individuality.

The developments proposed for Cam and Dursley will expand Cam down to the M5 where it will border on the proposed development at Wisloe. Thus making a large urban sprawl from Dursley to Slimbridge and Cambridge . The M5 should not be considered as a natural boundary between the developments .

The Draft Strategic Plan also states SDC's Vision to 2040 - 'We enjoy a high quality of life within our healthy, vibrant and diverse communities, which have a strong sense of their own identity and local distinctiveness' – This is clearly being ignored in proposing the development at Wisloe SDC Policy ES7.Paragraph 6.43 states that '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 the impacts on the open countryside'

SDC rejected sites and sited coalescence as a reason for doing so :-

'Upthorpe has been rejected as a 'housing development would erode the separation between Cam and Upthorpe'

'Development would encroach on the sensitive visual gap between WOT and Kingswood eroding the separation and distinct nature of the two settlements '

Can SDC please justify why they are suggesting development which against their own policy and inconsistencies in decision making ?

Rural Settlement Classifications

SDC have classified Slimbridge as Tier 3b and Cambridge Tier 4a which comes with recommendations for limited development to meet local housing needs .

SDC also recommends that the priority for larger scale development should be at Tier1 and Tier 2 areas, which are towns and larger villages.

As SDC are considering building in or near Tier 3b and 4a areas (Slimbridge and Cambridge)then there must be other similar areas that were originally rejected that fall within these Tiers that could be looked at again . This would allow SDC to follow a Dispersal policy as favoured in the consultation feedback and demonstrate a fairer and more consistent approach.

It would appear that Wisloe has not been selected on an evidence based process. It did not appear in the original 2017 consultation as an option.

It was only when Gloucestershire County Council and the Ernest Cook Trust proposed the development that Wisloe appeared as an option. Under SDC policy the area would have been rejected as it was Tier3b and 4.

Will SDC now consider a dispersal policy in similarly classified areas and revisit previous rejected Tier3/3b/4 sites ?

Noise

The proposed site is situated between two of the busiest roads in the area , the M5 and A38, and will be divided by the A4135.

SDC 's Settlement and Function paper identifies Slimbridge and Cam as dormitory areas for people working in Bristol, Gloucester and further afield ,so it is likely that commuting traffic will increase greatly with the developments at Cam and Wisloe. There will also be an increase in commuting from Sharpness/Berkeley to Gloucester and junction 14 of M5 with the proposals in Sharpness for 3000 extra homes .

The Department of Transport website shows that year on year there has been an increase in traffic using the A38 between Cambridge and the A419 .This is without the large scale proposed development and at least another 3000+ vehicles using the A38 and A4135

The recent survey undertaken on behalf of Gloucestershire County Council and the Ernest Cook Trust show noise levels of 80db, where permitted levels are 50db. It is unacceptable to expect residents to keep windows and doors closed as recommended in that survey, especially during the summer months .Trickle vents in windows do not provide adequate ventilation in warm weather. SDC state that their vision for 2040 'high quality of life within our HEALTHY vibrant and diverse communities ' , How can residents do that when they will have noise above permitted levels and the inability to enjoy gardens and open spaces due to the constant high levels of vehicular noise which exceed normal limits together with the fumes from the surrounding roads and M5.

There is a huge risk that this site will become another 'Hunts Grove ' with difficult issues to resolve and houses that don't sell.

The M5 has an elevated bank of approx 10m and it has been suggested by the developers that a huge huge and unsightly bund would be built and required in an attempt to deal with the noise emanating from there. Is this really a feasible option ?

How do SDC intend to mitigate the noise levels and they support development on this site

Transport and Pollution

As mentioned in a previous paragraph there will be a vast increase in traffic not only from the area highlighted but other developments along the A38, such as those in the South Gloucestershire area such as Thornbury and Falfield.

It was recognised in the report commissioned for the developers of the Wisloe site that Wisloe and Cam are too far away from employment areas such as Bristol, Gloucester and Stroud for them to walk or cycle to work and it is expected that residents will use their cars to commute.

The train station at Cam is already suffering from an issue with commuters parking in the road due to over capacity and no doubt when the development at Box Road is completed commuters will use that estate to park, which will have a detrimental effect on the residents there. There is also a question as to whether the station is large enough to deal with the anticipated numbers of extra commuters , given that there will be a need for extra carriages.

There will be major strain on an already problematic road system .Department of Transport figures shown that there has been a year on year increase of traffic along the A38 between A4135 and A419 and as well as cars, there has been an increase in light and heavy good vehicles.

Dangerous emissions will increase for new and existing residents due to the increased traffic flows and this is in conflict with SDC's 2030 carbon neutral policy and their commitments to residents' health. This will decrease the standard of living for existing residents who currently enjoy less issues with toxic fumes.

Does SDC intend to conduct a thorough transport study with suggestions for improvement or

consider a more sensible and less impactful alternative and build homes closer to where people work ?

What plans do SDC have to improve the transport network around the site to reduce traffic congestion and pollution from emissions ?

Does SDC have any plans to conduct a thorough emissions study to assess the likely impact of increased traffic and also the impact of building houses along the M5 corridor ?

How does SDC justify the impact that this will have on new and existing residents' health?

Infrastructure

We have real concerns that the developments at Cam and Wisloe will have a huge impact on existing services such as Doctors, Dentists etc and are concerned that developers of the sites are not under an obligation to provide these services. Whilst the site is under construction there will be an increased demand until such services are provided by the developers, if at all.

SDC have not included any plans in the Strategic Local Plan to improve parking facilities at Cam and Dursley where most of the services are located.

It is too far to walk to these services and there is no safe cycle route. It is likely that cars will be used to visit the services and shopping facilities.

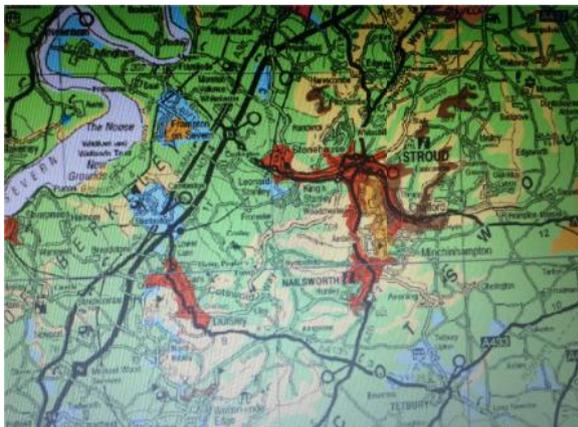
Schools will become an issue with increased demand for places. GCC have recently announced that they will build a new secondary school at Sharpness, which is beyond a walking or cycling route from Wisloe .

What are SDC's plans for dealing with the increased demand on services whilst the development is being built?

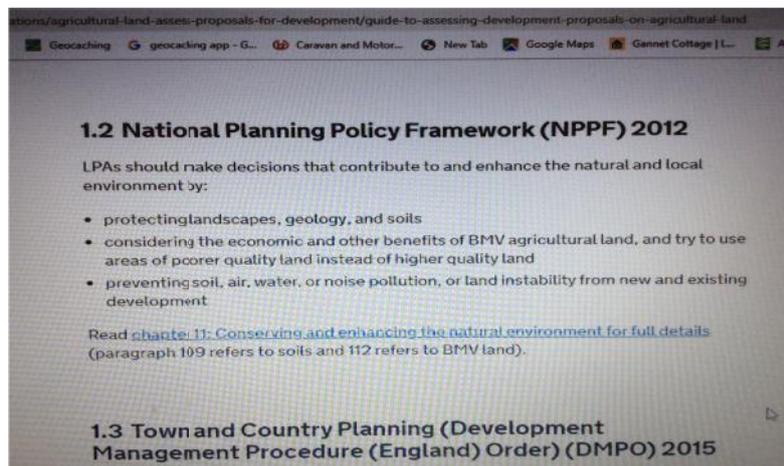
What can SDC do to guarantee that the developers will provide the infrastructure on the proposed site to meet needs of the residents ?.

Agricultural Land classifications

The land at Wisloe is classed by Natural England as Grade 2-very good agricultural land, and is amongst a very small number of sites with that classification in this area. As such Natural England classifies it as land that should not be considered for development.



<u>Grade</u>	<u>Description</u>
1	Excellent
2	Very Good
3	Good to Moderate
4	Poor
5	Very Poor



We live adjacent to this land and know that there is a high yield of crops so the land appears to be of good quality.

We cannot therefore understand why this land has been downgraded by the recent survey conducted by the Ernest Cook Trust and GCC.

At Prime Minister's Questions on 8/1/20 the Prime Minister stated that development should take place on Brown Field sites.

How do SDC justify the loss of such good agricultural land when there is lesser graded agricultural land and brown field sites available ?

Housing Needs

It would appear that there are 1000's of empty properties in Gloucestershire that could freed up for homes and this should be explored further by both SDC and GCC.

SDC have shown in their plan to build 15,000 homes when their current government target is 12,760 over 20 years. Population growth is estimated to increase in that time to be 20,000, so 15,000 houses seems excessive.

Why are SDC building more houses than needed and do they actually need Wisloe to meet the current government target?

Drainage and Flooding

There will be a huge impact in terms of surface water at this site and that is because there is a high water table all across the proposed site and the adjoining land. The attached photographs were taken on Thursday 10th January 2020 after a night of moderate rainfall. They show the run off from the fields into the northern end of Dursley Road. This run off continues along the road beyond Barton Fields. There is real concern that this will increase with the large scale building of houses, roads and pavements and cause a flood hazard with the difficulties regarding insurance that will occur for new and existing residents.

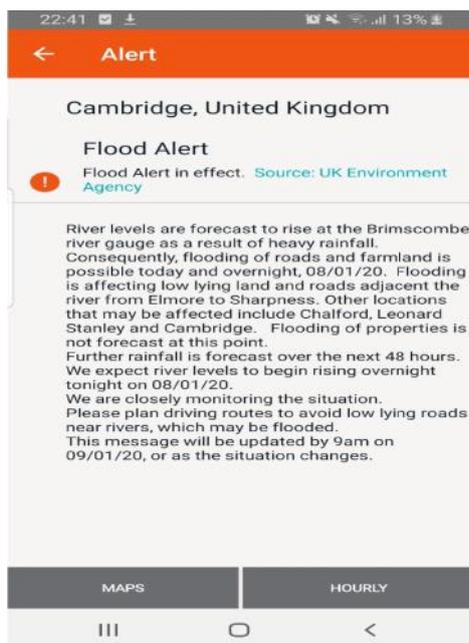




Slimbridge has already experienced problems with foul and water run off and these are well documented over many years .

It is disappointing to see that the report commissioned by GCC and ECT was merely a 'tabletop' exercise and no one has actually spoken with residents or visited the site.

The natural land drainage will be removed by the building of 1500 houses, roads and pavements . On 8/1/20 a flood warning was in place for the River Cam at Cambridge , issued by the environment agency. This is without an extra 1500 dwellings at Wisloe and the development at Box Road being completed.



There is little mention of these issues in the proposal and the cost of ensuring that these are mitigated for both new and existing residents could be enormous.

How can SDC ensure that drainage and flooding issues will not be exacerbated for existing residents ?

Impact on our 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 as a Rural District with the Berkeley Vale being the most rural part of that district.

This proposal goes against the philosophy that SDC are telling the residents they wish to pursue and will destroy the very nature of why it is a lovely place to live.

1500 houses will swamp the three existing villages (Slimbridge, Cambridge and Gossington) and change the landscape, environment and rural atmosphere for existing residents .

How can SDC allow this when they wish to maintain the areas rural nature ?

SDC state in the Local Plan that ' We have considered community views expressed through parish plans and other documents. We have taken into account all of the views expressed during these consultations in preparing the Local Plan.

41 sites were identified in the Emerging Strategy in ?????? and only four of those sites received overwhelming opposition. One of those sites was Wisloe.

Residents in Berkeley Vale overwhelmingly did not support the 'Mini Visions and Priorities' and 'Key Issues and Priorities ' for the area.

Yet in writing this I can see that SDC have ignored many of its own policies , recommendations and requirements and consultation feedback in proposing this site at Wisloe.

Dispersal was the favoured option and this seems to have been ignored in favour of a large quick fix site with easy access to the A38.

There are opportunities for a more dispersal approach and these should be revisited using the other 37 sites and in doing this SDC will show that the democratic process has been followed.

Houses in the 'Wisloe' area are still classed as being in Cambridge and their postcodes and addresses indicate that. This development appears to be a huge extension to Cambridge and given it's status as Tier 4b is totally inappropriate .

However, if SDC are determined to build larger settlements in Tier 3b and 4 locations then there should be a transparent, consistent and independent appraisal of all similar tier areas before the Local Plan is finalised.