

January 2020

Slimbridge Parish Council recognises the constraints put on Stroud District Council by the Government to provide housing within the district; however, there are a number of objections from Slimbridge Parish Council with regards to the Local Plan Review Consultation and the impact this would have on the Parish of Slimbridge.

Slimbridge Parish is a medium sized rural parish in Gloucestershire which has a population of 1210 people (Mid-year estimates ONS 2017), covering just under 500 dwellings. Whilst small growth has occurred over the years, this has had minimal impact on the rural environment of this locality, with the area retaining a strong village identity. The countryside location with the views around ensure the feel of a traditional village with surrounding hamlets connected via country lanes and a network of Public Rights of Way.

Slimbridge Parish as a whole

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

Tiers

In relation to Slimbridge and Cambridge, 'Wisloe Green' will be a large development 3 times the size of the whole parish of Slimbridge. This is out of proportion for the parish and will be unsustainable to the local environment. Cambridge is in Tier 4a of SDC Local plan, and Slimbridge is Tier 3b. Both of these tiers have been altered and re-categorised. (previously: Slimbridge 3 and Cambridge 5) In SDC Local Plan Review, 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"* and 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 locations for growth, ..., and most face significant environmental constraints"*

Within Slimbridge parish both descriptions of the tiers state that there are *"significant environmental constraints for growth"* therefore, this should demonstrate that growth within the Parish of Slimbridge of a proposed 1500 houses would have environmental damage to the area in a number of aspects. This goes against the tier descriptions Stroud District Council are proposing in their review.

Merging of villages

The proposed land allocation and development will potentially result in merging the Parish of Slimbridge and the Parish of Cam into one urban sprawl with only the motorway acting as a buffer. This will take the individual identities of each parish away, losing their uniqueness in the countryside.

SDC Local Plan 2015 states *“The countryside in some locations may be important to avoid the coalescence of towns and villages and to retain their individual character. These areas should be protected to retain visual and physical separation”*. This will lose the character of the locality. This goes against SDC Local Plan policy ES13 which states *“Development proposals shall not involve the whole or partial loss of open space within settlements, ... within or relating to settlements. There should be no harm to spaces which contribute to the distinctive form, character and setting of a settlement”*.

The Local Plan Review (Nov 2019) policy HC1 states *“on edge of settlement sites, the proposal would not appear as an intrusion into the countryside, would be sympathetic in scale and location to the form and character of the settlement, would not lead to coalescence with other hamlets or settlements and would retain a sense of transition between the open countryside and the existing settlement’s core”* Furthermore, the same policy also talks about new housing development should not cause the loss of, or damage to, any open space which is important to the character of the settlement or result in the loss of locally valued habitat which supports wildlife. If the Wisloe site goes ahead, it will do just this. The proposed land allocation for Wisloe development would also be of a scale, density, layout and design that is incompatible with the character, appearance and amenity of the Parish of Slimbridge in which it would be located, and the density proposed is not acceptable within this rural location.

There needs to be a significant green barrier between parishes and any new development to ensure the historic identity and individuality of each area is retained.

This is supported by the Slimbridge Village Design Statement 2016 stating in the key objectives and guidelines:

“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.”

Slimbridge Cllrs support the inclusion of the South of Hardwicke site, which would deliver approximately 1200 houses. This would be an extension of an already urbanised area and wouldn't be out of character for this locality. This could then eliminate or significantly reduce the need for the development in Slimbridge. The Hardwicke site is physically well-related to an existing settlement, whereas the proposed Wisloe Green site is separate and will encourage merging of communities of Cam and Slimbridge with an impact of losing individual identities. In previous responses Slimbridge did support a much smaller site by Tynning Crescent which would fall in line with the public's preferred option for dispersal of houses in the Local Plan.

With no Role and Function study done on the Wisloe site due to its late submission, it is located within the parish of Slimbridge. Both Slimbridge and Cambridge have been included in the Stroud District Role and Function study 2018 and it states that both areas have no significant employment role, with residents working within 2km of home being low compared to the rest of the district, with the most common workplaces being Gloucester, Bristol/ South Glos and Cheltenham thus demonstrating that the majority travel outside the parish for employment.

It is noted that the Wisloe allocation is made up of 3 separate sites and were assessed individually in 2018, whereas in fact they should be assessed as one site with consideration to the impacts this has on landscape characteristics and coalescence with surrounding parishes such as Cam. With this site merging with Cam, the possible housing allocation would be in excess of 3000, so again this should be assessed as one large site to look at effects on infrastructure and all the mentioned issues within this objection.

Land usage

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

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

The land being proposed to be built on is good agricultural land.

Building on good agricultural land would mean a loss of potential economic resources of growing food and also that of local jobs for local people.

NPPF (Chapter 15 170b) states *“recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”*

The land being proposed has been used for farming for many years, and therefore should not be considered in the Local Plan review as acceptable for development. This also goes against SDC new proposed policy DCP1 which states that all new development must be *“designed to maximise green infrastructure to sequester carbon and to support local food production”* as building on agricultural

land that is capable of growing food does not support food production. It also contradicts the Stroud District's CN2030 policies to *"Protect the most productive agricultural land to allow conversation to production of crops for local consumption"* as the development will be built on good farmland with people having to travel resulting in greater exhaust emissions and commuter miles from those needing to access supermarkets for food instead of potentially purchasing local food grown from local sources.

Should it be that the land has degraded, then Stroud DC should be looking at Campaign to Protect Rural England's policies on restoring the soils health in their document *"Back to the land: rethinking our approach to soil"*. Within the Stroud CN2030 action plan, it states Stroud DC should *"incentivise good soil management practices that enhance soil's ability to deliver environmental benefits through future environmental land management schemes"*

Slimbridge Parish Council have noted the research done by Wisloe Action Group in this matter and support their findings and the fact that further independent soil surveys should be undertaken again.

"Farming has always played the central role in making the countryside what it is and the loss of a diversity of farm sizes threatens detrimental consequences for the economic, social and environmental health of the countryside". (CPRE, Does the loss of farms matter? 2017)

Traffic and roads infrastructure

The A38 is a major transport route through the Parish of Slimbridge connecting commuters to Gloucester or Bristol and the M5. Junctions 13 and 14 of the M5 are already either close to or at capacity (as noted in Highways and Transport Overview commissioned by Ernest Cook Trust and Gloucestershire County Council), and significant improvements are required to accommodate the additional vehicles from not only this development but also Sharpness, Hardwicke and further into the South of Gloucestershire as this particular network of roads are used by all. The A38 has multiple speed limits along the stretch, therefore where development is proposed, to ensure safe connectivity and to promote cohesion between the communities, the speed limits should reflect this requirement and be reduced to benefit the environment.

The additional traffic will also not provide a safe environment with additional pollution and lack of infrastructure to promote safe walking, cycling, horse riding and access to public transport according to Chapter 9 of the NPPF 2019 *"Promoting Sustainable Transport"*. This policy goes on to state that *"transport issues should be considered from the earliest stages of plan-making"*, and that the scale, location and density of development should reflect *"opportunities from existing or proposed transport infrastructure"*; Also 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."*

Despite SDC Local Plan review policy DCP1 stating developments should be *"designed to discourage the use of the private car, irrespective of fuel source, by prioritising in order of importance: walking, cycling and public transport"* there is no evidence to suggest how this will be enforced or done within this development. Slimbridge Parish currently has only 6% of households that have no car compared with 26% across England (Gloucestershire County Council Inform Parish Profile 2019). The proposed development will still be situated just off the A38 in the middle of commuting routes either side to larger cities of Gloucester and Bristol. There is no evidence to suggest that employment land being provided will be able to meet the needs of the new residents (potentially at least 3000 based on 2 working adults per household). The new houses are still likely to have a high car ownership rate, with the current rate in Slimbridge of 44% of homes having 2 cars compared

with 25% across England with 2 cars. Should any development go ahead then all houses should have a minimum of 2 car parking spaces off-road each. In line with Stroud's Carbon Neutral policies, each house should also have electric charging points for cars. Should development bring a new school, this will also need its own car park to accommodate parents dropping off and picking up so as to prevent the congestion that is so common around rural schools in small areas with the current primary school in Slimbridge as a prime example.

Whilst Cam and Dursley train station is only a short distance away, this is not safely accessible by foot or bicycle, and this would have to be addressed to provide those means of accessibility. The Cam and Dursley train station provides invaluable links to Bristol, Gloucester, Cardiff and Bath and with increased development in Cam this is being used more. However, the train station can only accommodate a limited number of carriages due to the size of the platforms and the car park is often full. This means parked vehicles are spreading out onto the road network (Box Road in Cam), creating congestion on the neighbouring roads which are not able to manage the additional traffic. This will only get worse with the Wisloe allocation and further development being proposed in Cam. Significant improvements are required in the upgrading of the station capacity, facilities and road infrastructure to cope with this.

Improved transport links are vital and would be welcomed as a priority to ensure safer routes are put in place to ensure those who walk and cycle can do so safely. This could be in the form of upgrades to the bridge on the A4135 over the railway, or an additional bridge over the motorway to create these links. It is noted that the Role and Functions study 2018 states that Cambridge has "good" accessibility to key services, this is not the case as there is no safe walking or cycling route to Cam, which therefore puts pressure on the use of cars to access these services. What will be done to ensure more buses and routes will be available to encourage use of public transport? A bus service to WWT would be beneficial to alleviate the mass of traffic that can only access this popular tourist site via the one country road in and out of the rural village of Slimbridge. The only bus service available runs through the A38; will buses be encouraged to have stops in the new development and also within the villages and hamlet around to promote public transport?

In the Stroud District Sustainable Transport Strategy it states that the average commute is 17km with essential services some distance away, this demonstrates why there is a high proportion of car owners in the area as reliance on the car is an essential mode of transport when there is limited other means of reliable and accessible public transport. The proposed location is in an area of relatively low employment opportunities and therefore it is likely to remain a dormitory location with people having to travel outwards to work - all of this contradicting Stroud DC's CN2030 policies.

To be included with the improved transport links should be The Dursley and Uley Greenway which is a publicly supported project with the aim to connect Uley through to Slimbridge and on to the National Sustrans Cycle Route (41) at the canal. This would take in the Cam and Dursley train station on route providing vital links.

Amenities and facilities:

How will Stroud District Council ensure that the development will bring forward facilities such as schools, doctors etc to accommodate the needs of the development?; already, everyone in the parish has to travel out of the area to access these services with only the post office and school within Slimbridge accessible on foot within a 15 minute time period. All other services are much longer to access if using public transport or are not safely accessible on foot or bicycle due to the nature of the road network. At what point will facilities such as schools, medical facilities, shops etc be built and functional within the development? – will this be too late with those moving into houses registering themselves at schools and doctors in neighbouring parishes, congesting these up

further, and having to be accessed via car? Infrastructure has to be built earlier in the development to have any chance of people reducing their car usage in line with CN2030 policies

Sewerage infrastructure, flooding and water quality

Slimbridge Parish has suffered from years of insufficient sewage capacity with much evidence of flooding in the past. Over the past number of years, the Parish Council have been working with Severn Trent Water (STW), to resolve this issue. This has involved much community consultation and working with the Parish Council, which resulted in STW undergoing several modelling exercises to understand the issues and how it could be addressed. Works were then undertaken by STW and Gloucestershire Highways upgrading the facilities (replacing them would have been ideal but this would have cost much more). There is now a 3year monitoring programme in place to see how these upgrades are coping and what may need to be done more of in the future. Wisloe Action Group have also gone into detail of the works, time and community involvement that was required to get this far in the process. This work has only reduced the risks not eliminated them.

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

The fields being proposed for allocation currently hold the rainwater to some extent with reports being received, even this month, of fields flooded at this time. How will the flooding from the rainwater be mitigated with all the development? The Parish has a number of ditch networks that also assist in managing the run-off water; what will be done to ensure these are maintained and sufficient systems put in place to guarantee that the proposed development and the surrounding areas will not be affected by flooding? The desk based exercise currently carried out is nowhere near sufficient to comprehend the flooding issues within the parish and what the fields proposed for development hold when weather is torrential, and the impact this will have of water run off in the parish if these fields are developed.

Cambridge residents already receive flood warning on a regular basis with the most recent being earlier this month, again demonstrating the potential flooding issues within the parish, none of which have been mentioned or addressed within this site assessment of Wisloe situated in the Parish of Slimbridge. The River Cam, many years ago, had an improvement scheme undertaken taking into consideration the houses at the time to assist in flood alleviation; it is doubtful that further full surveys, other than desktop surveys, have been completed in this area to assess the impact 1500 houses would have on the River Cam and its capabilities of taking on so much water run off from this.

It is noted that there is potential for adverse impact on water quality in the area in relation to the Wisloe proposal, this is very concerning with the addition of not only Wisloe but the surrounding proposals in Cam too. The concerns addressed in the Wisloe Action Group report are supported by Slimbridge Parish Council

Noise and pollution

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

Whilst noise impact assessments and air quality assessments have been carried out on the sites, this is not conclusive as the site layout is not known should any development go ahead, however initial indications are that mitigation will be required and some of this includes how the houses are built and requiring windows to be kept shut to eliminate noise with the houses having suitable ventilation built in.

Wildlife impacts

Information gathered from GCER by Slimbridge Parish Council for the Village Design Statement showed there are a number of species of wildlife in the area, including bats and newts. The destruction of this area for housing will destroy all the habitats and change the biodiversity of the area completely. Much mitigation in providing wildlife areas within the development would be required. Also, the development on the land could have adverse impacts on the many birds that migrate to the area, many accessing WWT as their local environment.

Amendment of parish boundaries

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

Visual impact

Slimbridge Parish, whilst not located within the AONB, is viewed from the AONB from a number of viewpoints. As stated in the Slimbridge VDS, the St Johns Church steeple can be seen from quite a distance. The impact of 1500 houses will have a significant impact on this view from all visual points. Strategic Objective SO6 in first consultation round of SDC Local Plan stated, *“the strategy seeks to minimise the impact of development on biodiversity and sensitive landscapes by prioritising sites that lie outside the Cotswolds AONB or the protected landscapes of the River Severn estuary.”* It is disappointing to see this has been changed, as parts of Slimbridge very much lies on the River Severn Estuary, and the landscape of this area will significantly change with 1500 house being proposed and could, therefore, have a damaging effect on the biodiversity, heritage and landscape of the parish.

Ernest Cook Trust

The selling off of land from The Ernest Cook Trust for such a huge potential development on greenfield land is disappointing. This goes against the principles of Ernest Cook with their website quoting that Ernest Cook’s aims were preserving not only buildings and landscape, but the social, economic, architectural and environmental elements of rural life. By creating an urban sprawl in the open countryside goes against this original ethos.

The percentage of people who work in agriculture in Slimbridge Parish is 9%, which is well above the district average. By selling off agricultural land, employment will be lost in this sector.

Conclusion:

In conclusion, Slimbridge Parish Council objects to this proposal of land allocation for this amount of housing development in a rural parish.