

Slimbridge Parish Council
23 Tennyson Road, Dursley, Glos, GL11 4PZ
Tel: 07943 894637
E-mail: clerk@slimbridge-pc.gov.uk
Website: www.slimbridge-pc.gov.uk

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Slimbridge Parish Council response to the Additional Housing Options paper

Slimbridge Parish Council will respond to the paper by answering each question within this report.

Slimbridge Parish Council has contracted JB Planners to assist with advice in putting together the following responses.

Before addressing the questions Slimbridge Parish Council wish to note the future housing requirements with reference to the fact that in August 2020, the Government published a consultation document 'Changes to the current planning system' which proposed changes to the way the Government calculates the minimum housing requirement for each local authority area in the country. It is noted that this revised standard method has proposed increasing the requirement for Stroud District from the level set out in the 2019 Draft Local Plan of 638 houses per annum to 786 houses per annum, indicating SDC will have to find land for an additional 1050 – 2400 homes between now and 2040.

It needs to be emphasised that there is currently considerable uncertainty regarding future housing provision requirements at district level. It now appears to be the case that the Government will be re-evaluating its earlier proposals. There have been indications that efforts will be made to re-focus some of the proposed growth towards cities and areas of the country requiring significant regeneration.

Consequently it would be wrong for the District Council to automatically assume that the much higher annual housing requirement will actually be required.

Question 1: Which strategy option(s) would you support, if additional housing land is required?

Slimbridge Parish Council would support Option E – a hybrid / combination option

Question 2: Please explain which of the spatial options you would like to see combined in a hybrid strategy, and why?

Slimbridge Parish Council would support a combination of options A, B, C and F

With Option A, the urban extensions identified total 2,280.

- CAM North West – 700
- CAM North East – 180

- Hunts Grove Extension – 750
- Stonehouse Northwest – 650

The consultation paper suggests that these have planned average densities of around 30 dwellings per hectare (dph). If the average density of these urban extensions is increased from 30dph to 35 dph, which is typical for edge of settlement urban extensions, these allocations could potentially deliver 380 more homes (in total), as identified below:

- CAM North West – 117 additional
- CAM North East – 30 additional
- Hunts Grove Extension – 125 additional
- Stonehouse Northwest – 108 additional

If this was then combined with the sites the Council have identified under Option B (which we understand to be those listed in question 7 which provide a further 115 homes) then around 500 new homes could be delivered.

Option C, growth points at Whitminster and Moreton Valence, providing a further 2,250 and 1,500 (combined total of 3,750 new homes) would be supported.

Along with Option F, where Slimbridge Parish Council also consider that SDC should adopt a brownfield first approach to future housing provision (i.e. Option F). Regard must be had to the NPPF, which stipulates at paragraph 117 that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.

We note that the Stroud Five Year Housing Land Supply (August 2019) identifies that historic evidence demonstrates that small site windfall deliveries have averaged 75 dwellings per annum.

Furthermore, it is evident from Tables 4A-D (Actual and Potential Loss of B-Use Employment Land) that significant amounts of brownfield housing provision have been, and are likely to continue to, come forward from current and former employment sites. The District Council's development strategy must seek to maximise brownfield development opportunities in order to reduce the need for development needing to occur on greenfield sites.

Question 3: Do you support the approach of identifying a reserve site or sites, if housing development on the sites that will be allocated in the Local Plan should fail to come forward as envisaged?

Slimbridge Parish Council do not believe that it is either necessary or desirable to identify a reserve site. Instead, the Parish Council believes that SDC should ensure that suitable and deliverable sites are identified from the outset in the Draft Local Plan.

It is felt that SDC's proposed strategy could be dependent on too many new major developments within one particular area, and it needs to be recognised that only so much development is capable of being delivered at the same time within one area. It is therefore felt that the removal of Wisloe Green (PS37) would help alleviate the risk, with replacement provision, such as Whitminster and Morton Valence, being identified elsewhere in the district, where market absorption would not be an issue.

Furthermore, with regard to the need for any reserve site, it is believed that SDC is required to review its Local Plan at least every five years, so any delivery concerns would be able to be reviewed through this process.

Question 4: Which strategy option(s) would you support, if a reserve site (or sites) is required?

Based on the response in question 3, Slimbridge Parish Council, do not support reserve sites.

Question 5: N/A

Question 6: What should trigger a reserve site (or sites) coming forward?

Slimbridge Parish Council do not believe that the identification of any reserve sites is necessary. Consequently, there will be no need for any such triggers

Question 7 Do you support or object to the development of the sites identified?

- **7a BER016 Hook Street Farm, Berkeley**
- **7b BER017 Bevans Hill Farm, Berkeley**
- **7c HAR017 Land at Sellars Road, Hardwicke**
- **7d STR065 Beeches Green Health Centre**
- **7e WHI012 South of Hyde Lane, Whitminster**

Slimbridge Parish Council supports these small to medium sites that have a capability of delivering 115 new dwellings, based on the requirement of paragraph 68 of the NPPF for local planning authorities to recognise the important contribution that small and medium sized sites can make to meeting the housing requirement of an area, as can often be built relatively quickly.

Paragraph 68 identifies “to promote the development of a good mix of sites local planning authorities should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved”.

Question 8 Are there any other sites that you would like to be considered for future housing development?

No

Question 9: Do you support or object to the development of the potential growth points identified, or any sites therein?

- **9a PGP1 Land at Grove End Farm, Whitminster. Including SALA sites WHI007 and WHI014**
- **9b PGP2 Broad location at Moreton Valence / Hardwicke. Including the SALA sites HAR015, HAR016, HAR006, HAR007, HAR008 and HAR009**

Please explain why you support or object to the development of these broad locations. If your comments relate to a specific site within the broad growth area, please reference the SALA(s) site number

Slimbridge Parish Council supports both of the above sites as growth points.

Both Hardwicke (PGP2) and Whitminster (PGP1) are in Tier 3a, which are classified as “generally well-connected and accessible places, which provide a good range of local

services and facilities for their communities. These villages benefit from their proximity and/or connectivity to higher tier settlements or transport corridors, which enables access to employment and key services and facilities elsewhere, and which may offer some scope for further transport and accessibility improvements” as per the statement in the draft Local Plan. These sites are therefore in a tier more suitable to accept a growth point than Wisloe Green (PS37) which is in Slimbridge Parish and classified as Tiers 3b and 4 (Slimbridge and Cambridge) which is stated to have limited facilities and poor access to key services.

Both Hardwicke (PGP2) and Whitminster (PGP1) are not going to have any significant impact on merging different parishes into one and coalescing of communities, which the Parish Council believe is a high concern for Wisloe Green (PS37) coalescing with Cam and Dursley, and therefore in danger of both Slimbridge and Cam losing their identity becoming one urban sprawl instead of the small rural community that it currently is.

With regards to land usage, both Whitminster (PGP1) and Hardwicke (PGP2), whilst included in the 7.7km catchment zone of the 'Strategy for Avoidance of Likely Significant Adverse Effects on the Severn Estuary SAC, SPA and Ramsar Site' document, are not as close to a large wildlife area, e.g. the WWT, and therefore will have less impact on wildlife and the surrounding protected sites.

Both Whitminster (PGP1) and Hardwicke (PGP2) only have moderate to good agricultural soil, compared to very good agricultural soil, at the Wisloe Green (PS37) site, making PGP1 and PGP2 more sustainable to develop on and not losing land to farming potential on very good agricultural land. This is demonstrated on the Natural England website on an Agricultural Land Classification map for the South West.

For traffic and road infrastructure, both Hardwicke and Whitminster are closer to the M5 with junctions 12 and 13 very accessible with train stations in Stroud and Stonehouse accessible on commuter routes. Wisloe Green (PS37) is further away from these junctions and employment site, therefore making it less sustainable and the need to travel further higher.

Question 10: *Are there any other sites that you would like to be considered as a future growth point?*

No

Question 11: *Do you have any comments to make about the Sustainability Appraisal that accompanies this consultation document*

Slimbridge Parish Council recognise the need for the Sustainability Appraisal (SA) for these sites and would request that before the final Local Plan goes out to consultation in the Spring, all the major growth points would be assessed alongside each other using the same methodology for each sites, so as a fair comparison can be made in their sustainability aspects.

The Parish Council support the A419 as the most sustainable of the 3 travel routes.

Growth points should ideally be sited near employment regions which will therefore minimise travel for work purposes. Therefore growth points situated on the major link roads close to the larger settlements of Stroud / Stonehouse and Gloucester are more self-contained than those further afield such as Wisloe Green (PS37) which has less access to employment and will result in higher commuter journeys.

From looking at the 2 new growth points in comparison to Wisloe Green (PS37), the Parish Council wish to raise the following comments:

- SA5 Noise pollution – the topography of Wisloe Green (PS37) demonstrates varying height levels in relation to the M5, the railway line and the A4135 flyover and will have a significant impact on noise levels for this growth point compared to the Whitminster (PGP1) and Hardwicke (PGP2) growth points that have more natural sound barrier with the way the land lies in those areas.
- SA8 Conserving character and distinctiveness – the development of a growth point at Wisloe Green (PS37) is not a stand alone development as it would result in coalescence of parishes, joining Slimbridge Parish with Cam Parish, and therefore becoming one urban extension resulting in a loss of its rural identity and character.
- SA9 Conserving historic environment – a number of archaeological digs have occurred within Slimbridge recently by the local history society, identifying many archaeological items. Wisloe Green (PS37) is likely to be no different, and with the recent discovery of the Roman Villa in Cam, just a short distance away, the site would require significant consideration to its historical value in the community, with a suspected presence of further Roman buildings on site.
- SA10 Air quality – with Wisloe (PS37) based in the rural south of the district and therefore likely more commuter travel will be required than at Hardwicke (PGP2) or Whitminster (PGP1), it is likely to produce the worst air quality outcome with higher pollution from car usage as being further away from employment sites.
- SA11 Water quality – the Sustainability Assessment fails to state that Wisloe Green (PS37) falls entirely within a Drinking Water Safeguarding Zone, as opposed to being near one.
- SA12 Flood risk – it is disappointing to see that this document says about Wisloe (PS37) being mostly free of higher flood risk as there seem to be no background research done on the past years of Slimbridge Parish Council and local parishioners (with very local knowledge) working with Gloucestershire County Council and Severn Trent Water on the parish wide flooding issues and the lack of capacity of the sewage works for the area. Whilst much work and monies have been put into rectifying these issues, the area is still under review by STW with regards to the effects of sewage capacity and dealing with surface water flooding. Therefore it is believed that significant more in depth studies are required on this and these should include professional site surveys.
- SA13 Protection of soil quality – It is believed that Wisloe Green (PS37) is of Grade 2 quality soil and should therefore be protected, as this is of high quality with little of this soil elsewhere in the district. Evidence of this has been mentioned in the above paragraphs under Q9.
- SA16 Employment – whilst some employment will be included at Wisloe Green (PS37) it is still likely that this site will result in higher commuting to access jobs at the main employment centres which are more accessible by having growth points at Whitminster (PGP1) and Hardwicke (PGP2).

Slimbridge Parish Council overall concludes that a hybrid approach is likely to be the best sustainable option that will achieve the required housing numbers for SDC. The Parish Council believes that large scale growth points are more sustainable on the travel routes of C1 (A38) and / or C2 (A419) rather than at C3 (A4135).

The Parish Council believes that the 2 new growth points at Whitminster (PGP1) and Hardwicke (PGP2) are more sustainable than the growth point at Wisloe Green (PS37) with the main reasons being:

- Commuting miles for employment

- High quality soil
- Coalescence
- Archaeological and historical sensitivity
- Noise and air quality
- Flood risk and water quality.



Clerk to Slimbridge Parish Council

16th December 2020