

1. Thank you for the opportunity to comment on your latest version of the Stroud District Draft Local Plan. Hamfallow Councillors have attended the exhibitions and discussions that have been arranged by yourselves and by Ridge, the developer of the proposals for new housing in our area. We have also attended meetings of the local action group, BASRAG, to gauge public opinion on your Plan.
2. In this regard, we would also point out that in our last joint **Hamfallow/Hinton Parish Plan**, on which we consulted parishioners, **less than 2% of respondents favoured clusters of over 100 houses in their parish**. As a result, our parishes committed in that Plan to fight large scale developments and to push for sizeable starter/affordable home components in any developments that do take place.
3. Please note that we also commented on the earlier "Emerging Strategy" a year ago and we are very disappointed not to have received any response to the detailed comments we made (attached for ease of reference). None of the concerns we expressed have been addressed in the current draft Plan and so all our earlier comments still apply as comments on the current draft plan. **We would like to have proper responses to the issues raised below, and those in our previous response, within 28 days of the close of this consultation.**
4. We are very disappointed that the essentials of the new Plan seem almost the same as the previous version we criticised, as in point 3 above.
5. However, we now see that at this very late stage it is proposed to double the size of the development by 2050, to 5000 houses in total. This was not made clear in the previous "Emerging Strategy" and we believe it is an abuse of the planning and consultation process to introduce such a major extension to the proposals at this late stage.
6. We are concerned about the apparent willingness of the owners of the Focus School (PS 35) to sell this land for development. Many of our older local residents feel that this is a misuse of land that they were promised would either be a community school or be returned to agricultural use if no longer required. Please could you confirm the legal agreements at the time the original secondary school was built and at the time of sale to the Focus School.
7. We now understand from discussions with the developers that they do not intend to provide any additional capacity for cars and so they see no need for the Berkeley bypass to be completed. See points 7 and 8 of our previous response for our views and objections on this.
8. The developers have also stated that they do not intend to provide electric car charging points for every dwelling. However, we observe that in a recent consultation Government has proposed provision for charging points should be made in all future residential developments and this is likely to be a legal requirement in the near future. It seems to us short sighted not to plan for this now.

9. The developers have been talking about using the old railway line and providing bus services and this is mentioned in the draft Plan. How will these be guaranteed? We also note that rail services to Cam and Gloucester are mentioned, when the main target for commuters is, and is likely to remain, Bristol. How will this be facilitated? We would be interested to see some example timetables for the major routes.
10. We note that there is no mention of the interactions, in terms of the inevitably increased road traffic, with the plans of South Gloucestershire Council. What consideration has been given in general to interactions with neighbouring authorities development proposals and what and mitigation measures are being planned?
11. Another concern we have is for how this proposal will affect Berkeley town. Although outside our parish, it is the centre for many activities for Hamfallow parishioners. So we would like to know what plans there are to improve Berkeley town centre and integrate it with this development.
12. Regarding development of infrastructure generally, including schools and community facilities as well as transport, we are concerned about partial development going ahead without the corresponding and promised infrastructure. Therefore, we wish to see a detailed timetable of exactly when each element of infrastructure is to be provided, both in time and relative to number of houses built.
13. A major feature of your Plan is increased local employment, through which you appear to justify not providing sufficient infrastructure for cars. On page 39 of the development consortium's prospectus we see the statement: *'market signals have indicated that this is an attractive location for business growth due to its accessible location as well as being flat, serviceable land.'* We see no evidence of a significant demand from businesses to invest in the area, apart from large/ low employment warehousing at Sharpness. Indeed, we would point out that in your 2011 "Potential locations for strategic growth" document, you questioned the viability of increased employment in the Sharpness area, in the following words: *'Very little market demand for employment development in this location: land has been allocated here... for more than 30 years and development has yet to happen.'* That latter statement certainly reflects our local knowledge and experience. What do you feel has changed to justify the developer's optimism now?
14. In the draft Plan on page 119, you refer to the national "Garden City Principles." However, at all other points in the plan you describe the Berkeley/Sharpness proposals as a "garden community" or "garden village." This is an obviously and intentionally misleading description of a development of 5000 dwellings and is, in our view, a clear abuse of the public information and consultation process. We believe that you should issue a correction to the Plan and an apology to consultees.
15. **In summary, we believe that this draft Local Plan is intentionally misleading regarding the proposed development of Berkeley/Sharpness, that it has been produced by a flawed consultation process, which has not responded to points made by consultees throughout the process, has not justified the proposal and that the assumptions made on**

employment and transport are plainly wrong. That said, our Council remains willing to consider sensible, realistic and proportionate housing development in this area.

- 16.** We request that a copy of this and our earlier response are provided to any Planning Inspector that may be appointed to review the Plan.

Hamfallow Parish Council
January 2020

CONSULTATION RESPONSE TO STROUD DISTRICT COUNCIL'S LOCAL PLAN AND EMERGING STRATEGY 2018, FROM HAMFALLOW PARISH COUNCIL

1. Councillors from Hamfallow Parish Council have attended public exhibitions on the review of the Stroud District local plan at Sharpness and Slimbridge village halls; and public meetings on the proposed local developments held at the Prince of Wales and Berkeley Arms hotels and at Sharpness village hall. This consultation response is based on feedback we have received from parishioners at these events.
2. Our concern is with the developments within and adjoining Hamfallow Parish, as set out in the "Emerging Strategy 2018," specifically developments PS33, PS34, PS35 and PS36.
3. Firstly, we wish to make clear that we recognize the need for new housing and that Stroud District has been given an allocation of 5700 new dwellings by central government, which it needs to provide for in its Local Plan. Secondly, we accept that most communities within the District must accept some further development if the District is to achieve the above housing allocation. **However, we wish to strongly object to the proposals for our area.**
4. These proposals, if realized, would see the building of at least 3000 new dwellings within and in close proximity to Hamfallow Parish. This is completely disproportionate to the size of the existing communities of Berkeley and Sharpness/Newtown. It would change this area, between the A38 and the River Severn, from being predominantly rural with small settlements into an almost totally built-up area with at least three times as many dwellings as we have now.
5. The "Emerging Strategy 2018" document is positively misleading about these developments, describing them as: "Growing two new villages and boosting local vitality by making the most of our natural resources, leisure and tourism..." This statement is wrong in every respect. 3000 plus almost contiguous dwellings are not growing villages but building a new town, largely on greenfield land. Nor is it a "garden village community" as described elsewhere in the document. It will not boost local vitality in any meaningful way, as it will not contribute significantly to local employment and will positively discourage tourism. Who will want to visit what will essentially be a massive housing estate?
6. We also question the wisdom of a major development housing upwards of 10,000 people within 1-2 km of a major intermediate level nuclear waste store. Although the development is outside the detailed planning zone for a nuclear accident, this waste will remain on the Berkeley site for the foreseeable future and the perception of prospective purchasers on risk levels may be very different from the reality. A factor like this, that could reduce the selling price of these properties could adversely affect the solvency of the developer and their ability to deliver agreed infrastructure improvements.
7. We have also reviewed the Sustainability Report with regard to the Berkeley Cluster. We find it rather misleading, inconsistent within itself and the results are not, we feel, properly reflected in your Strategy. For example, the comments on Page 101 regarding Sustainability Attribute 10 (SA10), air quality, arising from development of the Berkeley cluster, states that there will be a minor positive effect on air quality. This is contradicted by the results in Table 6.8 for SA10, which shows minor detriments to air quality resulting from PS33 and PS35 and significant negative effects to be likely from PS34 and PS36. We agree with the results in Table 6.8. They support the comments we make below, that there will be far more car

journeys made as a result of this development, resulting in much poorer air quality in the area. On another matter, employment and economic growth (SA,16 and 17), we strongly disagree with the findings, which show both as significantly positive in Table 6.8. This appears to be for no other reason than that the Sustainability Appraisal authors (para 6.66, page 101) have accepted the District Council's "vision" that small scale local businesses and low-impact tourism related activities will be encouraged. No doubt the District will encourage them, but we see no evidence from the Sustainability Report, the Emerging Strategy or our long involvement in this area, that it will be significantly successful. Far more likely that existing employment hubs out of the District will continue to grow and attract commuters from this development. We see no evidence for growth of significant non-car transport within the Berkeley cluster, even with a few more footpaths and cycleways (of which there are plenty already).

8. Finally, our main objection to the totality of this proposed development is that it is in completely the wrong place with respect to the road infrastructure. Again, the Strategy and the "Sharpness Eco Village Vision Document" seek to minimise this issue by referring to local employment (which will always be minimal) and cycleways/footpaths. The reality will be that the vast majority of these new dwellings will house two or three people working outside the area, most likely in Bristol, Cheltenham, or Gloucester, generating roughly an extra 10,000 return journeys per day. Being next to the river, there is only one way out of this area and that is onto the A38. Even were a new access road to be built (Berkeley bypass completion), this traffic would meet the increasingly heavy traffic from proposed developments to the north (Wisloe) and south (Buckover). Then, the only access to the M5 is via the already, and increasingly, heavily congested junctions 13 and 14. Although improvements to these junctions are mentioned in the Strategy, in our view no realistic improvements to these junctions could cope with this extra traffic, again added to that from proposed developments to the north and south. No such housing developments should be proposed until all of the necessary road improvements have been delivered.
9. We also note that the District Council has chosen not to propose development at large potential sites much closer to good road infrastructure, such as Whaddon, even though there appears to be no substantive proposals from Gloucester City Council for developments in that area.
10. **In summary, it is our submission that the lack of local employment and inadequate highway access are fatal objections to this ill-considered proposal.** Notwithstanding those inescapable facts, Hamfallow PC would not necessarily object to more proportional and realistic development in this area. It is clearly not for us to make proposals, but the 400-500 dwellings represented by PS33, PS34 and PS35 might be more acceptable to the local community.