



Dear Sirs,

I am writing to comment on the Draft Plan for Consultation November 2019 for the Stroud District Local Plan.

It is with dismay that we find, despite the representations of many members of the local community during the Emerging Strategy consultation where objections were raised specifically to the proposed development of Garden Villages at Berkeley/Sharpness (PS36), the proposal is now for an even larger development.

It is not surprising that there is a level of cynicism within the community about the value of responding to these proposals when it is perceived that people's opinions count for nothing in the overall scheme of things.

I remain opposed to the adoption of a 'hybrid option' to local housing needs specifically because I feel that the creation of a large new development ('growth point') is inappropriate anywhere in the district. The housing needs of the area remain for people to be able to buy homes near to where they already live and at a reasonable distance from where they work. Villages across the area all need some level of new housing to enable first time buyers and downsizers as well as larger families to stay in their own communities. Larger developments need to be sited in proximity to major employment areas to reduce the need for intensive car use.

Specifically I believe the proposed development at Sharpness/Berkeley (PS36) is misguided for the following reasons:

A new town of 2500 rising to 5000 homes is out of all proportion to the current settlements. The rural character of the area would be totally destroyed and the existing settlements would lose their identities.

The location is unsuitable having been identified by the council's own research as isolated - at considerable distance from major employment and poorly served by local amenities.

With little local employment, the vast majority of inhabitants of a new town would end up working in Bristol or Gloucester/Cheltenham.

The local road infrastructure is poor even for the current volume of traffic and entirely inadequate for the thousands of additional car journeys that would be generated. The cost of upgrading the road network would be considerable.

Public transport is poor with only basic bus services. The investment needed to create a transport system not only for commuters but for people simply wanting, for example to go to the cinema or leisure centre would be enormous.

Proposals to reinstate the local branch railway while seductive in theory seem at best unlikely to come to fruition and at worst entirely cynical. This view was compounded during a conversation with a representative of the developers at one of the roadshows. When I asked whether Network

Rail were really likely to take the Berkeley Branch line back into the National Rail Network he responded that he felt that the local railway enthusiasts group The Vale of Berkeley Railway would welcome the opportunity to maintain the line and would 'probably do a better job of it' than Network Rail. The notion that part of the UK's National rail network could be maintained by a small group of volunteers is laughable.

In the absence of massive investments in infrastructure there is a real risk of creating a new town in the image of some of the UK's most deprived communities – coastal areas with little employment, poor facilities and few opportunities.

The proposed development is not only not 'green' or sustainable in and of itself, it is also positively detrimental to a location of internationally recognised importance. To build a town of such a scale in proximity to a RAMSAR, SAC/SPA area goes far beyond negligence and into the realms of vandalism. The fact that the Habitats Regulations Assessment produced by Footprint Ecology, (published incidentally on 29th November 2019, 9 days **after** the commencement of this current consultation period), should highlight so many areas for further assessment and evidence gathering makes one question the process that has so far been undertaken. Surely this research should have been completed before the proposal for this development reached such an advanced stage.

Part of the available land is designated as flood plain and the developer's proposals naturally take that into account. However, the impact of climate change over the next half century is not known and it may not be unreasonable to suppose that a large development on low-lying land close to the River Severn is unlikely to improve the potential threat of rising water levels.

It has not been hard to come up with these objections as Stroud District Council has themselves said, and I quote directly:

"Whilst Sharpness has the theoretical capacity to achieve this scale of development (and more), it is relatively remote from main employment centres and primary facilities and services in the District, would require significant new infrastructure and has flood risk and landscape impact issues. Cam, Eastington or West of Stonehouse are all preferred as the more sustainable and viable options, should this scale of development be considered desirable.... The site is relatively remote from the major service areas, with relatively poor road links..... Land close to the River Severn is at risk from flooding and susceptible to climate change in the scenario of rising sea levels currently envisaged.

This proposal would effectively be the creation of a "new town" – complete with new services, facilities and employment opportunities. It would only 'work' sustainably as a location if there were sufficient onsite employment opportunities (in numbers and type of jobs) to enable genuine living and working within the community. The location is remote from any other major employment, retail or leisure hubs. As with other potential locations, it is likely that there will remain an element of both in- and out-commuting... but the remoteness may make this more of an issue here than at some of the other potential locations.... Very little market demand for employment development in this location: land has been allocated here (current Local Plan allocations EA3, 4, 5 and 6) for more than 30 years and development has yet to happen.... Berkeley could be dwarfed by its "new town" neighbour.

This location has a significant additional long term 'risk factor', not present at other potential locations: one of the objectives stated in the government's draft NPPF (paragraph 148) is to: "...reduce risk from coastal change by avoiding inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast".

Core Strategy Discussion Paper: Towards a Preferred Strategy – pros and cons of potential locations for strategic growth October 2011, produced by Stroud District Council, Planning Strategy Team.

Since that document was published nothing has changed to make this location more desirable as a site for a new town. A cynic would say that SDC having had imposed upon them the need to build many more houses than are actually needed locally have taken the line of least resistance and taken advantage of landowners willing to sell their land and developers keen to build and come up with a solution for which they now need to find justification. I question the way the process has been undertaken and I object most wholeheartedly to the current proposal.

Please ensure that this letter is made available to the Planning Inspector in due course.

Kind regards,

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