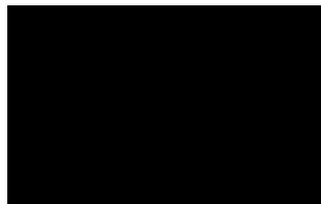


The Planning Strategy Team
Local Plan Review
Stroud District Council
Ebley Mill
Stroud
GL15 5UB



18 January 2019

Dear Planning Strategy Team

Stroud Local Plan Review Emerging Strategy – Public Consultation on the Emerging Strategy

I am writing to make representations in response to the Council's consultation on the Stroud Local Plan Review Emerging Strategy. Thank you for providing us with this opportunity.

Rather than complete the on-line survey, I wish to register this letter as my formal objection to the Emerging Strategy. This objection relates both to the Emerging Strategy as a whole, and to the specific proposals in the Strategy for the "Berkeley Cluster, Newtown and Sharpness", which are set out on page 81 of the "Stroud District Local Plan Review Emerging Strategy Document November 2018".

I also wish to give notice that I intend to participate in all subsequent stages of the Local Plan Review process including the Examination stage.

I recognise the value of the on-line questionnaire in ensuring that all key issues are covered and responded to in a structured way. But one purpose of writing this letter, rather than relying solely on the questionnaire, is to seek to ensure that my detailed points are expressly addressed by the Planning Strategy Team, rather than being grouped with other representations.

This letter and attached document set out my concerns regarding the Emerging Strategy, to which I would ask you to pay careful attention. I have included specific questions and specific clarification requests. I would ask you to reply to these questions and requests personally and in writing.

My comments and requests are intended to be constructive and will hopefully help the Council avoid some of the pitfalls that can beset the Local Plan process and to generate a sound and robust Plan suitable for adoption.

My principal objections can be paraphrased as follows:

Emerging Strategy - gaps and omissions in strategy development, assessment process and evidence base, which invalidates and renders premature the Council's emerging strategy choice and the site allocations upon which that relies.

Newtown and Sharpness – case not proven: gaps and omissions in strategy development and assessment and in evidence base relating to need, site related constraints, sustainability, deliverability and viability; conflicting capacity information; reasons why the site is unsuitable are well-articulated in the Council’s own SALA 2018 and include: greenfield, internationally important biodiversity impacts, heritage, countryside and settlement impacts.

By way of an observation and recognising the considerable challenges of carrying out an effective consultation, whilst you are to be congratulated on the quality and clarity of the Emerging Strategy document, I feel there are certain key omissions, including the absence of cross referencing to relevant supporting documents and information, which I consider will have made it more difficult for members of the public to generate a full and meaningful response.

For all of the above reasons, the Council needs to confirm that the emerging strategy and associated site allocations are provisional, draft and work-in-progress. It is essential that the Council does not commit to a preferred strategy or to specific sites until:

- it has had the benefit of all the additional studies,
- it has published and consulted on these studies; and
- it has produced and consulted on a revised emerging strategy.

Please see the attached document which forms a key part of my representations and should be read alongside this letter.

With many thanks and kind regards

