

**Submission on behalf of BaSRAG
(Berkeley and Sharpness Residents' Action Group)**

Following public meetings in December 2018 and January 2019, BaSRAG (Berkeley and Sharpness Resident's Action Group) was formed to represent the views of local residents.

Our position was, and remains, that:

1. We believe the Berkeley and Sharpness area is not a suitable location for the scale of development being proposed in the Emerging Strategy Paper (Nov 2018) of the Stroud District Local Plan Review.
2. We believe the council has not provided robust evidence to support its proposals for new development in this area under the Emerging Strategy of its Local Plan.
3. We want sensible and sustainable levels of development in the Berkeley and Sharpness area.

As a result of that position, we have the following objectives:

1. To be the voice of concerned residents of Berkeley/Sharpness with regards to the Local Plan review.
2. To ensure a fair process is being followed and local people are made aware of new developments in the Local Plan review process.
3. To ensure all the evidence put forward by the council to justify any revisions of its Local Plan is clear and robust.

Following the end of the previous consultation (to the 'Emerging Strategy' phase) we engaged with the Council's planning officers over various issues. Unfortunately, this has not resulted in any – from our point of view – improvement in the proposals for our area; in fact, quite the reverse, in the sense that you have added a further 2,600 houses to the so-called Sharpness Garden Village, to be delivered in Phase 2 up to 2050.

To summarise our objection to the proposals for site PS36, we believe the key issues include:

- Process
 - o There is confusion between an Emerging and a Preferred Strategy which we have discussed at length. We believe the omission of a Preferred Strategy stage is detrimental in the whole process.
 - o The original four positions described in the original Issues and Options consultation and which had been subject to sustainability appraisals and other studies were replaced in the Emerging Strategy with a 'hybrid' strategy, which had not received the same level of detailed scrutiny.

- At the Emerging Strategy stage, the Council relied entirely on the developer's marketing material for their description of the Sharpness development.
- There has been a lack of response to the previous consultation round, not giving the public the opportunity to understand the Council's attitude to the opinions they had expressed, other than some anodyne comments in the Emerging Strategy Consultation Report – Part Two which was published at the same time as the Draft Plan for Consultation.
- This report was one of many apparently rushed out in the weeks preceding the Draft Plan for Consultation, which gives the strong impression of an attempt at providing post facto evidence to justify the Council's proposals.
- It cannot be congruent with feedback previously given to the Council with those consulted favouring a dispersal option, that there should be two growth points in the south of the District.
- We do not understand why SDC has chosen to include in the plan the extension of the period of the plan to 2050 from 2040 for a second phase of development at Sharpness. You assume the same building rates as defined in 2020. The demand for housing in that decade is not likely to be the same as the current demand as the population of the UK is declining (ref Office for National Statistics).
- All of the above suggests a strong democratic deficit, denying the public proper opportunity to examine and discuss any evidence that might support the Draft Plan proposals in a timely fashion. It appears that the Council has arrived at a settled position which includes having the Sharpness development as the centrepiece of their strategy. To make any significant changes to the proposals at this relatively late stage would be highly undesirable for the Council, whatever the public view.

- Employment

- In an area previously deemed by the Council to have very limited opportunity for employment growth, how can 10 hectares of land dedicated to business use, together with some element of people working from home really provide enough work in the area to prevent a very significant increase to commuter traffic (see below)? As stated in the 2015 Local Plan, "the former employment allocations have not been taken up as envisaged in the 2005 Local Plan and accessibility remains an issue."
- Also due to the remoteness of the proposed site your assessment in the Core Strategy Discussion Paper: Towards a "Preferred Strategy" Potential locations for strategic growth (2011) was that there was "Very little market demand for employment development in this location." Nothing has changed since then!

- Transport

- There is only one road in and out of the proposed Garden Village. That road is considered barely adequate for existing needs. There is real confusion between the position of the planners, who say the current Berkeley by-pass will be extended to the A38 as proposed in the 1980's, and the developers, who say they will not provide any improvement to roads, as that will only encourage residents to use their cars. How can residents reach an informed view without clarity on this point of huge present and future local concern?
- The studies shown in the Issues and Options paper deemed that the transport infrastructure in the Berkeley/Sharpness area was the least suitable of all those considered.
- Located where we are in the District, the majority of commuters currently travel south to the Bristol area, competing for access to the already heavily congested junction 14 of the M5, while those travelling north join the M5 at junction 13 which also has considerable congestion issues. These junctions are likely to require considerable upgrading work at considerable cost.
- The proposed railway station or halt and link to the main line at Berkeley Road will, even if it happens sometime in Phase 2, post 2040, only provide a potential solution for those commuters travelling north to Gloucester.
- It is unrealistic to think people travelling to Bristol for work will catch one train to Cam and then wait for a further connecting train south, when they can reach the city more easily - and quickly - by car. In addition, no evidence has been provided by the council or the developers to prove that reopening the railway line is viable and/or affordable. It is therefore, in our view, misleading for the council to say at this stage that this will happen.

- Environment

- We copied you in on our communication with Natural England regarding our concerns regarding the potential impact on the Severn Estuary SSSI, SPA, SAC and RAMSAR site. Those concerns remain having not been addressed to date.
- In turn, we note from the Habitats Regulation Assessment dated 29th November 2019 that adverse effects cannot be ruled out and that it was recommended to 'establish the extent and nature of the impacts, and their combined effects on the site, and then what avoidance and mitigation measures may be possible, and how they can be justified and supported by evidence' before it is decided whether it is possible for a settlement to be developed at Sharpness.

- We note also the cursory mitigation measures the developers are proposing in their updated documents and suggest that these are totally inadequate.
 - It is not possible to mitigate against the loss of green fields once they are built on. The loss will have a negative impact on uptake of CO2, habitats for wildlife and birds, who will also then have to suffer building noise and light pollution, and the mental health of local residents in a landscape being radically transformed for 25 years.
 - It is acknowledged that part of the area is in a flood risk zone but that no dwellings will be built there. However, it is unclear whether the effect of a likely rise in river levels due to the climate emergency has been taken into account.
- Education
- A Secondary school is not planned until Phase 2, after 2,400 houses have been built with resulting demand for education, when existing secondary schools are already full and families already in the area are struggling to place their children in a school of their choice. What provision would be available for secondary school age children in the intervening years?
- Local housing need and communities
- We understand, of course, that a development of this size is to help satisfy the housing requirement of the District as a whole, rather than to meet any need of the immediate locality. However, we have seen nothing that provides comfort that the type of housing would be affordable for young people in the area hoping to buy their first home.
 - Indeed, a member of the team representing the developers advised us that one can have infrastructure or 'affordable housing', but not both!
 - Effectively, the character and nature of the separate communities of Berkeley, Sharpness, Wanswell and Brookend would be destroyed by them being joined up in a new town approximately five times their current combined size.

We remain of the opinion that the proposals for PS36 represent a politically expedient solution providing a high proportion of the District's housing requirement in an area which is totally unsuitable from an employment, infrastructure and environmental point of view.

It also does not appear to reflect SDC updated priority issues, i.e.

- Moving the District towards becoming Carbon Neutral by 2030.

- Ensuring new housing development is located in the right place and supported by the right services and infrastructure.
- Conserving and enhancing Stroud District's countryside and biodiversity.
- Maximising the potential of brownfield sites to contribute to housing supply.
- Developing strategies to avoid, reduce and mitigate the indirect impacts of development on the natural environment.
- Addressing the lack of affordable housing the District.

This political expediency, at the outset, may have been partly driven by a misperception that the community here would offer little resistance. The responses to this consultation, along with those in the last round, show that is certainly not the case.

We believe that it makes no sense to build the vast majority of the new housing in the south of the District, when there is envisaged significant growth between Gloucester and Cheltenham for economic and industrial development (ref: Vision for Gloucestershire 2050).

While we understand that the Council has a Duty to Co-operate, and that a significant area of land at Whaddon is preserved for Gloucester's use, it would appear to make more sense to build at areas such as Whaddon and Hardwicke, close to existing employment zones and infrastructure, to help Stroud's need. Then, from a County perspective, concentrate Gloucester's growth to the north of the city.

For the record, we have no significant objection to the proposals at PS33, PS34 or PS35. when set apart from PS36.

We would ask that our previous correspondence be reconsidered as part of this consultation, as well as documents 550 and 550b (submitted by one of our members), as these documents explore the above issues in greater depth. We would also request that our submissions are made available to the Inspector in due course.

21st January 2020.