

Key Issues and Section 2.6

As I stated in my response to the Emerging Strategy, the opportunities for brownfield development are very limited in the District and whilst maximising the use of such sites is important this should not be one of the highest 5 priority issues in achieving sustainable patterns of development. More important is to balance housing provision with provision of jobs as close as possible to existing and proposed housing. Therefore I believe more important issues for the Council to address are those under the Economy heading on page 15 of the Draft Plan. Providing new employment opportunities and balancing these close to housing provision with a focus on reducing car commuting trips into and out of the District is surely of higher priority in a rural district such as Stroud. This should be addressed as a key issue and would do far more alongside your ambitious new Key Issue re Carbon Neutrality to achieve a carbon neutral District by 2030.

There remains no evidenced economic strategy in this Draft Plan that sits alongside the housing strategy. The growth points in the housing strategy at Sharpness and Wisloe have little relationship to current employment locations and do not contain a scale of new employment provision necessary to avoid further out-commuting. They will essentially be dormitory settlements dependant on car use to reach the main employment locations and higher level services provided at the higher level settlements in the District and beyond. As stated in the Draft Plan, work is ongoing to produce a Local Industrial Strategy and an Economic Needs Assessment. It appears the provision of housing is leading any economic strategy rather than working in tandem with it and there is little economic evidence to support the location for the growth points contained in the Plan. It is questioned to what extent any evidence, yet to come, will be made to fit the housing strategy.

The Emerging Strategy stated that it will seek to deliver a clear economic strategy to support sustainable economic growth. A year on from that undertaking there is still no clear evidenced economic strategy. That should have been in place before land allocations were proposed and not produced at the last minute alongside the Submission Version of the Plan as now seems most likely. Potential sites and alternatives as suggested later in the paper should be founded upon such a clear economic strategy allied to strategies for meeting housing need and environmental protection. This is a serious omission in putting forward the development locations in chapter 5..

Section 2.5 Housing

This section is still disingenuous in respect of the District Council's ability to deliver 638 new homes per year and the impression given that brownfield land may accommodate them to any great degree. It is developers that deliver housing in broad terms (with the exception of a few by the council) and very little of the requirement could be delivered on brownfield land in Stroud District as it simply does not exist in any great quantity. There is no track record of developers being able to build 638 homes per annum in Stroud and no indication that they will do so in the future. Large sites in Stroud allocated for housing in the past by and large have not delivered housing at the rate initially promoted by developers. Why should anyone believe they will do in the future?

There is nothing in the housing strategy that addresses the new key issue on Carbon Neutrality. Location of housing is important in this area and also its relationship to

employment, higher level services and facilities. No reference to or reasoning for the use of growth points at Sharpness and Wisloe is made in this section as a means to addressing this key issue. In my view the proposed growth points will harm that objective rather than help to achieve it. The housing strategy should address this issue head on and it should be explained how the locations for housing will help to address that issue.

As I stated in my previous response to the Emerging Strategy, Options 1 and 2 consulted upon in the Key Issues and Options Paper 2017 appeared to present the most sustainable options for housing growth and also gained the most public support. No further evidence has been produced to alter that view. I would continue to advocate consideration of a combination of those sites to provide the bulk of housing development together with a small measure of dispersal to support local needs in the lower tier settlements. To that end I welcome the introduction of the South of Hardwicke site (G1) as a far more sustainable location for housing into the Draft Plan though I do not understand the attached comment stating it is only included for consultation purposes. Is this in the Draft Plan or not and why should this site be singled out in this way? Surely all the sites proposed are in there for public consultation purposes or is there some expectation that other sites will be carried forward irrespective of what the public say whilst this site may fall?

With the focus of economic development in Gloucestershire being the proposed Cyber Park at Cheltenham and the Gloucester-Cheltenham 'super city' as proposed through the Gloucestershire Vision 2050 project and the GFirst LEP Gloucestershire Local Industrial Strategy 2019, it makes sense in terms of sustainable planning for the focus of housing to be orientated in that direction. Gloucester's housing needs should be met north of the City closer to the economic hub, whilst Stroud's housing growth should be focussed further toward the south of Gloucester at Hardwicke and Whaddon in addition to the Hunts Grove extension. Large scale extensions there meeting a large part of Stroud's housing need makes more sense in sustainability terms, being closer to jobs, high level services and facilities with extensions to existing infrastructure being far more sensible than starting afresh at the end of a cul-de-sac - the B4066 in Sharpness.

Core Policies CP2 / CP3

I remain of the opinion that the growth points advocated at Sharpness and Wisloe will not provide the most sustainable developments. In general all the settlements identified in Core Policy CP3 as having settlement boundaries are suitable for some level of growth. Notably Wisloe is not one of these and it isn't even a settlement defined in the LP! It is the level of growth that is critical to the residents and employers of these settlements. I believe most people accept that some level of growth is acceptable - but it is the scale and nature of that development that needs to relate to the existing settlement. This is particularly pertinent to Newtown/Sharpness and Wisloe - It is the scale of growth that is totally wrong. A proportionate level of growth at Sharpness would be acceptable bearing in mind the size of the settlement and the services/facilities it provides. Wisloe is not a settlement and would not qualify for any growth.

Sites on the southern edge of Gloucester should not meet Gloucester's needs. Whilst co-operation with the JCS over their housing/employment needs and allocations is necessary, it should be recognised that the needs of Stroud can/will also be met on the sites south of Gloucester. The Gloucester/Stroud boundary is an artificial construct for administrative

purposes and does not reflect people's desires in terms of a place to live or work. Some of the housing/employment needs for Stroud could/should be met in part on these sites. The strategies of both the JCS and Stroud should reflect this reality and the site at South of Hardwick (G1) should be included in CP2 and the site at Whaddon (G2) should not be reserved solely for Gloucester's needs but should address Stroud's needs.

Chapter 3,

Stonehouse Cluster

Sites WHI007, EAS009/ 011/ 013/ 017

I support further development in this cluster at the above sites as indicated on the plan on page 67 of the Draft Plan. They are in a more sustainable location than Sharpness or Wisloe - they are better related to higher order facilities and services, have better transport links and opportunities and are better related to employment opportunities than the proposed development at growth points.

Cam and Dursley Cluster

CAM010/ 011/ 015/ 016/ 018/ 021

I support further development in this cluster at the above sites as indicated on the plan on page 70 of the Draft Plan. These sites are in a more sustainable location than Sharpness and Wisloe - they are better related to higher order facilities and services, have better transport links and opportunities and are better related to employment opportunities than proposed development at growth points.

I object to the allocation of PS29. Development here would have adverse landscape impact especially on setting of the AONB. It is 'the wrong side of town' in relation to employment opportunities and accessibility.

The Gloucester Fringe Cluster

Sites G1 South of Hardwicke and G2 Whaddon

These sites can help to meet Stroud's needs and should not be reserved solely for Gloucester's needs. See answer to 4.2d. This site is in a more sustainable location - it is better related to higher order facilities and services, has better transport links and opportunities and is better related to employment opportunities than proposed development at growth points. See also my previous comments under Section 2.5 Housing.

Berkeley Cluster

The draft vision for this area should revert to the mini-vision contained in the 2015 Local Plan, thereby omitting references to new communities at Sharpness and Wisloe Green and the alleged transport 'improvements' that will flow from them.

In referring to improved transport links the emphasis should be on public transport. There is poor provision of bus services. Road links are adequate for current traffic levels with the exception of the incomplete Berkeley bypass that forces increasing flows of HGV's along Berkeley Heath. Pedestrian provision is poor connecting the communities of Sharpness-Wanswell-Brookend-Berkeley. Pavements are narrow with grass verges overgrown onto the poorly maintained footpaths and hedges often left to grow into the

footpaths. This makes walking between these communities difficult and dangerous at times as pedestrians get forced onto the roads.

Site BER008 (as shown in the Emerging Strategy paper but omitted in the Draft Plan) Whilst this site could round off housing development in Berkeley I believe it is better suited as an extension to the adjacent playing field and should be allocated to provide increased play space for the growing population of Berkeley.

Site PS35 Wanswell

I maintain my objection to the allocation of this site. It is currently in education use - it is a purpose built school building dating back to the 1960's and was a valued community asset until its sale by GCC to the Prospect Education Trust. Sadly, the community are now excluded from its use as the One School Global UK Bristol now occupying the site take no active community interest. Their SALA submission suggests the school configuration does not meet their needs. This seems bizarre in that they acquired the school only in 2012 and have improved the facilities since then to meet their needs. There are only 153 pupils at a school that once catered for 250 pupils. Their website suggests that the school continues to operate successfully. However, notwithstanding that, if the school is redundant to its current occupiers the school should first be offered back to public use and be retained as a community asset. In the, hopefully unlikely, event that a new 2,400 house development does go forward then a ready built community asset such as this would prove invaluable in meeting wider community needs and should not be redeveloped for housing.

PS36 New Settlement

I maintain my strong objection to the scale of development proposed here. It is accepted that some development is needed to help meet local demand for housing but that should be proportionate to the existing scale and nature of the settlement and located adjacent to the existing settlement boundary.

There are many reasons to object to this scale of development and you should also refer to the submission by BaSRAG for more detail which I support. Principally I believe this development is in an unsustainable location (relative to other locations in the District). The transport links are inadequate in all respects - see earlier comments re pedestrian facilities and bus services. It is located at the end of the B4066 cul-de-sac with only that road providing one way in and one way out. The section between the incomplete Berkeley Bypass and the A38 is inadequate for current levels of traffic with disturbance caused to adjoining residents by the ever increasing HGV traffic.

There are very few employment opportunities within the immediate area and despite efforts to attract employment for over 30 years, these have met with very little success. It is evident that the market is not interested in this as a location for employment. The allocation of 10 hectares of land for employment uses is totally inadequate to address the future employment needs of residents of 2,400 new dwellings in the plan period let alone the total of 5,000 new dwellings promoted to arrive by 2050. The last allocation of 9.8 hectares in the 2015 Local Plan has only recently been developed for a large warehousing facility that is likely to employ only around 200 people. The idea that more employment intensive uses will be attracted to a

site of 10 hectares to provide a higher level of self containment is without foundation. Evidence of the last 30 years indicate this will not happen.

A new settlement of 2,400 dwellings (5,000 by 2050) would exacerbate existing commuting patterns out of the area to workplaces and higher level services and facilities (shops, secondary and further education, hospitals etc) in Cam/Dursley, Stonehouse, Stroud, Thornbury, Yate, Bristol, Gloucester and beyond. It would place great pressure on the M5 junctions at j13 and j14 - probably to the extent that major upgrades to the junctions would be necessary.

The land proposed for development is productive farmland that forms part of the "beautiful landscape and valuable estuarine habitats, which are nationally and internationally protected" as acknowledged at para 3.60 of the 2015 Local Plan. Its development would have an adverse impact on that landscape and on the protected habitats of the Severn Estuary. The Habitats Regulation Assessment and Sustainability Appraisal accompanying the Draft Plan have both pointed to the potential adverse environmental effects and stated that the case is unproven to mitigate the potential environmental damage.

The area generally lies within a flood risk area and as the Sustainability Appraisal Addendum 2014 noted, there is uncertainty regarding the long term effects of climate change. The likely effects of climate change are unaddressed by the Plan, especially the potential impact of sea level rises on flood risk.

The sewerage facilities serving the area are inadequate for a development of this scale and would require significant upgrading and investment.

Current Local Plan policy seeks to protect the freight facilities at the Sharpness Docks. A development of this scale could harm those facilities through potential conflict between the noise and dust generated by dock operations and new residential development. This issue has not been addressed in developing the Draft Plan and should it arise if the development goes ahead could well lead to the closure of the Docks with resultant loss of employment.

Current Local Plan policy also seeks to enhance the tourism potential of Berkeley and Sharpness. In denuding the current landscape and natural environment and bringing increased traffic into the area this development would have an adverse impact on that potential.

This proposal does not meet the requirements of para 72 of the NPPF. The proposal is not well located and the design, whilst in its infancy, does not appear to address adequately the environmental harm it will bring. The infrastructure requirements for this proposed development are extensive and will be expensive putting the viability of the proposal, and hence delivery, at great risk. As the author of the Place Alliance/CPRE report (A Housing Audit for England) issued 21/01/2020 has acknowledged, many developers cannot be trusted to deliver on their 'promises' but put profit before design, including the delivery of appropriate amenities. No guarantees or safeguards have been put in place for this proposal about design, infrastructure, transport etc. There is little to no community support for this proposal. The economic potential of the area is poor relative to the more established towns in Stroud and in particular the Gloucester-Cheltenham focus of the wider County economic

strategy. There are unlikely to be net environmental gains. Employment within the proposed community itself is unlikely to attain a decent degree of self-containment. Access is not good to nearby larger towns and out-commuting is likely to continue or worsen. Garden City principles are referenced in the Plan but not enshrined in policy.

PS37 Wisloe

I similarly believe this is not a sustainable location for a development of this scale, relative to other locations in the District. It is unlikely to be a largely self contained community but would become a dormitory village/town exacerbating car commuting around and out of the district. It is unlikely to provide levels of employment sufficient to meet the needs of its population. Infrastructure costs would be extremely high as it is starting from scratch and not building upon any existing infrastructure. I support the Wisloe Action Group in their opposition to this proposal.