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To: _WEB_Local Plan
Subject: Local Plan comments - Site location PS36

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To whom it may concern

I have the following comments in relation to site location PS36 within the Draft Local Plan and object to its current allocation and scale.

Evidence base – Scale of development

The Strategic Allocation Assessment suggests fewer than 2000 homes to be suitable yet the Local Plan is for 2400 with a further 2600 as Phase 2 beyond the Local Plan period. Where is the assessment and evidence base to support this scale? There is no Feasibility Study / Options Appraisal / Site suitability? Additional material has been provided for the smaller Wisloe proposal yet this is absent for PS36. Where are the surveys to support the proposal of a settlement of this scale? Where is the evidence to support the population density?

Evidence base – Suitability of allocation

How does the Sharpness allocation align with the SA recommendation that: *'...in selecting site options to allocate, there would be a need to avoid settlements where negative environmental effects on biodiversity/geodiversity, landscape/townscape, historic environment, water quality and flooding are more likely'*?

Landscape

'The large areas of rural countryside which surround the main and more peripheral settlements, play a large role in influencing the landscape character of Stroud District as well as the townscapes of those settlements.'

'Seven sites at Brimscombe and Thrupp (PS02), Minchinhampton (PS05), Nailsworth (PS07), Stonehouse (PS20), Cam (PS22), Newton and Sharpness (PS36) and Painswick (PS41) are located at locations which have been identified as having medium/high or high sensitivity to development. Development at these locations could have significant negative effects on landscape character in the district.'

Where is the evidence to support that the location and scale of development proposed at PS36 is 'likely to help promote a high quality of design and the protection of existing green space and landscape character'? They are clearly at odds.

Flood risk

'Development at the draft site allocations at Brimscombe and Thrupp (PS01 and PS02), Stroud (PS13) Stonehouse (PS20), south of Hardwicke (G1) Whaddon (G2) Berkley (PS33), Newtown and Sharpness (PS34) and the new settlement at Sharpness (PS36) would result in increases in the number of residents who have potential to be affected by flooding in Stroud. As such, it is expected that the development of these sites would have significant negative effects in terms of flood risk in the district.'

Where is the detailed flood risk assessment to support the suitability of site allocation?

Biodiversity

There is acknowledged potential for a detrimental impact on the Seven Estuary and local key wildlife sites.

Where are the biodiversity and ecological assessments to inform the appropriate boundaries of development, scale and impact?

Environmental impact

Carbon standards concern design, construction and utilisation but what about the impact of development itself? What about embodied carbon for all the freight journeys to allow for such large scale development via one single, B road?

What about the air quality implications in relation to development over a significant period of time (likely to be decades)? What about the environmental implications of the loss of such a high volume of greenfield land?

How will all that be off set?

Type of development

The SA states:

'Delivery policies could include the requirement for residential development not to be sited in close proximity to unsuitable neighbouring uses (e.g. waste management facilities, the strategic road network or railway lines), which might otherwise have impacts on the residential amenity of the new development.'

Yet the proposals for Sharpness include:

- two phases bisected by a railway line
- the arterial route to development being the B4066 – a primary freight route to Sharpness Docks

Transport and Access considerations

The Transport Strategy acknowledges that the transport hierarchy is unrealistic until sustainable options exist, therefore transport infrastructure must be prioritised. Realistically car is the only option in the Berkeley cluster – the 'walkable' and 'cyclable' commutes do not even reach Dursley, there is no public transport connection to Cam & Dursley railway station and the transport evidence does not even list the Berkeley bus service, poor as it is.

The main artery into the new settlement is a poorly maintained, heavily used B road. It is acknowledged as a primary HGV route into the Sharpness docks, accessed via heavily trafficked freight runs on the M5 and A38. Yet there is no proposal to make improvements or alterations to this route with the exception of an improved junction/roundabout from A38 to B4066 and alterations to accommodate buses. What about options to divert traffic? To create a better junction to the A38 south of Berkeley?

There is a further acknowledgement that the new employment growth at Gloucester and South Gloucestershire (most notably at Thornbury) is likely to prove particularly accessible to residents of Stroud District considering that the strategic road (M5 and A38) network runs directly through these areas. However the Transport Strategy also clearly states that the motorway junctions in the area (from J12 to J14) are already at capacity.

Infrastructure – Priorities and availability

Education

The SA states: *'The most notable increases in educational demand are likely to occur at the new settlements at Sharpness and Wisloe.'*

Appreciating that increasing population will influence education requirement where is the detail from Gloucestershire County Council and South Gloucestershire Council (as the existing Katherine Lady Berkeley secondary school in Wotton under Edge includes intake from South Gloucestershire villages)? How will education provision be maintained for the Berkeley cluster if plans for development in Charfield (a feeder location for KLB School) go ahead? It is clear from the Local Plan and development proposal that the secondary school is not an early priority for development.

Health

There is a need in the Berkeley cluster for better NHS facilities in the form of general practice and dental already – this volume of development will place a significant strain on the existing facilities.

The SA states : *'There is also potential for there to be inadequate health related service provision in the early stages of development at the new settlements at Sharpness and Wisloe. As such there is potential for adverse impacts in terms of access to healthcare facilities at rural locations and the new settlements particularly in the short term.'*

Furthermore huge swathes of open space will be lost with development of this scale, how does that accord with priorities for health and access to open space?

Adequacy

'There is also potential for there to be inadequate service provision in the early stages of development of the new settlements at Sharpness and Wisloe, which may limit the potential for this development to address the issue of social inclusion.'

'A significant amount of growth is also to be directed to new settlements at Sharpness and Wisloe, which will provide new services and facilities as part of development ... However... there may be potential for service and facility provision to be inadequate during the early stages of development at the new settlements.'

Garden Village Principles

The Sharpness Garden village is clearly envisaged as a distinct settlement in the Local Plan. The Town and Country Planning Association guidance states:

'New garden villages may be developed as 'distinct settlements' only where there are sufficient employment and community facilities provided within the development to support the population and where there is an affordable and easily accessible public transport system linking the new garden village with its 'parent' town or city.'

Please can it be explained how the new settlement is linked to the 'parent' town or city? The sustainable transport options to Berkeley appear to rely on walking and cycling and the transport system appears to be wedded to commuter transport options linking to major employer locations or to Cam & Dursley railway station. What about trips for leisure? What about access to Stroud itself as centre of the district?

The Local Plan aspirations talk about 'coherent relationships with existing settlements' yet the Sharpness proposal is a standalone, it eclipses the smaller Berkeley Tier 2 settlement and will completely change the hierarchy of places in the area.

Thank you for consideration of the above.

Kind regards



Berkeley resident