

RESPONSE TO STROUD DISTRICT COUNCIL'S DRAFT LOCAL PLAN CONSULTATION, NOVEMBER 2019.

1. Thank you for the opportunity to comment on your latest version of the Stroud District Draft Local Plan. I have attended the exhibitions and discussions that have been arranged by yourselves and by Ridge, the developer of the proposals for new housing in our area.
2. I am disappointed that the essentials of the new Plan seem almost the same as the previous version, except that, at this very late stage, it is proposed to double the size of the development by 2050, to 5000 houses in total. This was not made clear in the previous "Emerging Strategy" document **and I regard this as an abuse of the planning and consultation process to introduce such a major extension to the proposals at this late stage.**
3. I do understand the need for new housing and that Stroud District has been given an allocation of 5700 new dwellings by central government, which it needs to provide for in its Local Plan. I also accept that most communities within the District must accept some further development if the District is to achieve the above housing allocation. However, these proposals for PS36 would see the building of at least 2500 new dwellings which is completely disproportionate to the size of the existing communities of Berkeley and Sharpness/Newtown. It would change this area, between the A38 and the River Severn, from being predominantly rural with small settlements into an almost totally built-up area with at least three times as many dwellings as we have now, even by 2040. **I strongly object to these proposals for our area.**
4. I am disappointed about the apparent willingness of the owners of the Focus School (PS 35) to sell this land for development. I live only one field away from this school and I feel that this is a misuse of land that was only sold to be a community school or be returned to agricultural use when no longer required. **So I also object to the PS35 proposal.**
5. The developers now say that they do not intend to provide any additional capacity for cars and so they see no need for the Berkeley bypass to be completed. They have also stated that they do not intend to provide electric car charging points for every dwelling. However, Government has proposed provision for charging points in all future residential developments and this is likely to be a legal requirement soon. It is short sighted not to plan for this now. **I believe you have completely and intentionally ignored the road traffic implications of the proposed development.**
6. The developers speak of using the old railway line and providing extra bus services and this is mentioned in the draft Plan. Will you guarantee this? We also note that rail services to Cam and Gloucester are mentioned, when the main target for commuters is likely to remain Bristol. How will this be achieved? We would be interested to see example timetables for the major routes.
7. This proposed development is about as far as possible from major areas of employment as it possible to get, in Stroud District. Yet, there is no mention of the interactions, in terms increased road traffic, with the plans of neighbouring local authorities, South Gloucestershire Council for example. What consideration has been given to interactions with neighbouring authorities development proposals and what and mitigation measures are being planned to avoid congestion at "black spots" such as J14 of the M5 and the Almondsbury interchange?
8. There are other significant problems with this location. The proposed site is bordered by the River Severn and therefore access is constrained to a 180 degree arc, whereas most development sites have a full 360 degree arc of access. This, will reduce the attractiveness of the site to many potential employers and home owners. There are also two significant areas of risk associated with this location. Firstly, there is the risk of flooding of the development, as sea levels rise. So I would

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like to know what comments the Environment Agency on this in their statutory consultee response. Secondly it seems most unwise to propose such a large development within less than a kilometre of an intermediate level nuclear waste store on the old Berkeley Power Station site.

9. I am concerned about the risk of partial development going ahead without the corresponding and promised infrastructure. Therefore, I would like to have a detailed timetable of exactly when each element of infrastructure is to be provided, both in time and relative to number of houses built.
10. A major feature of your Plan is increased local employment and on page 39 of the development consortium's prospectus there is the statement: *'market signals have indicated that this is an attractive location for business growth due to its accessible location as well as being flat, serviceable land.'* I see no evidence of a significant demand from businesses to invest in the area, apart from large/ low employment warehousing at Sharpness. I would point out that in your 2011 "Potential locations for strategic growth" document, you questioned the viability of increased employment in the Sharpness area, in the following words: *'Very little market demand for employment development in this location: land has been allocated here... for more than 30 years and development has yet to happen.'* This statement certainly reflects my experience. What do you feel has changed to justify the developer's optimism now?
11. In the draft Plan on page 119, you refer to the national "Garden City Principles." However, at all other points in the plan you describe the Berkeley/Sharpness proposals as a "garden community" or "garden village." This is an obviously and intentionally misleading description of a development of 5000 dwellings and I believe is a clear abuse of the public information and consultation process. We believe that you should issue a correction to the Plan and an apology to consultees.
12. **In summary, we believe that this draft Local Plan is intentionally misleading regarding the proposed development of Berkeley/Sharpness, that it has been produced by a flawed consultation process, which has not responded to points made by consultees throughout the process, has not justified the proposal and that the assumptions made on employment and transport are plainly wrong.** That said, our Council remains willing to consider sensible, realistic and proportionate housing development in this area.
13. Please provide a copy of my response to the Planning Inspector at the appropriate time.


21st January 2020