

**Comments on Stroud Local Plan of Nov 2019
with particular reference to the Berkeley Cluster
and the overall Stroud District strategy**

I wish and request that all my comments below are forwarded to the Planning Inspector unless at that stage I have been able to submit a fresh document which will be submitted instead.

Environment

Estuary Habitats and HRA

1. Much is rightfully said about the challenges and various effects of climate change but it is often overlooked that the UN's IPBES Global Assessment Report on Biodiversity and Ecosystem Services (May 2019) puts the main cause of biodiversity loss down to "Change of Land and Sea Use (including coastal infrastructure development)".
2. In particular, the report finds that wetlands are the habitats that have been worst affected. On top of that, wetlands are rare habitats anyway. It is imperative that the internationally important Severn estuarine area is valued and protected in practice, not just in words.
3. Stroud District Council's plan for large scale housing development within the RAMSAR/SAC/SPA/SSSI protected zones - much of it within 400m, most within 1km, some adjacent - amounts to unnecessary urbanisation of the area and a deliberate disregard for the environment. It is also going in the face of new knowledge, wide concern and the direction of opinion.
4. Urbanisation will inevitably lead to more urbanisation due to the demands of the urban area for more buildings, services, improvements, roads etc.
5. I have read through all of the Habitat Regulations Assessment and although it is a well written document, I am struck by how little substance the authors had to draw on regarding the Severn area. In particular, there has been very limited research regarding the wildlife and habitats between Berkeley Pill and Purton. The effects of urbanisation were discussed but the ideas regarding mitigation were vague, and evidence of strategies used successfully elsewhere is absent.
6. Some studies may now be underway but considering the council has to prove there will not be negative impacts, I question why the plan has proceeded to such a late stage without supporting evidence. The HRA points out how much needs to be done here and warns that mitigation may not be achievable - but elsewhere in the council's documentation there is a presumption that the plan will be adopted.
7. The list of references near the HRA report's end shows that the evidence is not available.

Visitor Survey (and the area from Sharpness to Purton)

8. The Severn Estuary (Stroud District) Visitor Survey (June 2016) does reference some research regarding overwintering birds. However, the research here needs extending, updating and validation. The information revolves around the disturbance of overwintering feeding birds during fine weather daylight in Dec-Jan. No study was done into bad weather roosts.
9. The effects of urbanisation and visitors on the habitat, food chain, other wildfowl, their spring/summer breeding season, insect life, soil, and the salt marshes and estuarine ecosystems as a whole and in all seasons has not been addressed. The knowledge base to do so does not seem to be available.

10. The Visitor Survey report has not been updated with a later Natural England study as promised by that report. Searching elsewhere online, it looks like there has been a more recent study into high tide roosts but this is not available without a freedom of information request which time does not currently allow. Why is this study not referenced in the HRA and included in the evidence?
11. The Visitor Survey is wrong in its statement that the Severn is not accessible from the relatively busy stretch between Sharpness Marina and Purton. The wild grassy area salt marsh beyond the reeds and visible from the canal path can be very easily accessed in ordinary flat footwear as it is actually a fairly firm peninsular. This is currently very little known but a trail which was not there previously can now be seen on Google Map's satellite view. The ship graveyard's increased public profile (including TripAdvisor) has caused an increase in visitors as can be seen from the ever widening muddy footpath and erosion near the ships. Once there are more visitors, see lovely photos online or copy others, more will trample out there. There are ground nesting birds out there. There is also an abundance of expensive sea aster which makes the area very vulnerable to foraging.
12. The flora in the area mentioned above demonstrates very well how the habitat can alter a lot with just slight underlying changes. Different patches have very different vegetation for no obviously apparent reason. This indicates the fragility of the salt marsh habitats to small changes in sea levels and other factors. This affects the food chain for all wildlife. It also affects cover and breeding as well as food. It is not just the current Salt Marshes which need to be conserved: the fields which could in future become salt marshes or high tide roosts need to be conserved too.

Changing Severn and Man-Made Infrastructure

13. The river and its surrounds will change over time anyway but with climate change and rising sea levels changes will happen more quickly. There will also be erosion, especially of salt marshes. Land that is now 400m from the Severn will become closer. The open green space which is intended to separate the new town from the Severn may become unsuitable as a green space or it may need to be given over to nature. Drainage and flood management will squeeze out nature. There will be increasing conflicts between the needs of the settlement and nature conservation. There will also be conflicting pressures due to flood management of rain water as well as tidal water.
14. The Severn already lacks breathing space to adapt since much of it is already bounded by man-made infrastructure. The western bank has the railway line, a tunnel, cliffs/banks and a different geography without the wider flatness of the eastern side. On the Stroud side, there are the docks, the power station and the college area. Going north from Sharpness Marina there is the canal path wall for quite a way. The salt marsh beyond will eventually be squeezed out, as will high tide roosts between the windmill and the lifeboat station. Going south from the Power Station, there is a short area of grazed grass and salt meadow before a very long stretch of high concreted rock sea wall with mainly mud below and farm land immediately behind. The area around Slimbridge may be ideal for birds at present but that might not hold true as sea levels rise. It is also now acknowledged that wildlife areas need to be bigger, closer and better connected. Relying on Slimbridge is not enough.
15. The area between Sharpness and Berkeley Pill is the one other current stretch of grassy shoreline and salt marsh in the area. This area currently has a grass bank dyke which carries the Severn Way and is open to the water and very big skies. The dyke is only as high as the very high tides and there will be conflicts between protecting the area from flooding, thus squeezing the intertidal area, or allowing nature space to survive. Some of the fields behind this dyke have recently been lost to warehouse development and huge hedgerows ripped out. (This building work will have already affected wildlife and may even have affected recent survey results.). The fields, especially nearer the Pill end, are already used by flocks of water birds such as geese for feeding. It is imperative that the remainder of this area is not developed or urbanised, or compromised due to nearby development. A new town so close to this area is completely inappropriate.

Berkeley Pill to Sharpness Area (and other green spaces)

16. I agree with the visitor survey that the Berkeley Pill end has very few visitors. However, this is a unique, beautiful and wild area with great light, colourful grasses and a real sense of space, peace and remoteness (the power station is beyond the Pill which acts as a barrier). The Berkeley Pill has good wildlife habitats all the way to the road. This area is little visited and not well known: access from any road currently requires a long walk, one that is also not easy from the Berkeley end - the path from the power-station road gets muddy, brambly, and subsides down a steep slope. There is no parking near the Berkeley end and the roadside path to the Power Station has got into a bad state with traffic too close for comfort. There are stiles at both the Berkeley and Sharpness ends, and a particularly difficult one half way from Sharpness. With housing close by and an increase in visitors, the number of visitors to this part of the Severn will increase enormously even if there are other green spaces within the development.
17. In very recent years there has been a significant spread of sea aster in the Sharpness to Pill area. This area is therefore also very vulnerable to foraging.
18. The majority of visitors to the Sharpness Picnic site do not go to the dyke and grassy/salt marsh area, and those that do tend to be dog walkers and do not go far. I call this area Sticky Heaven as the driftwood contains an endless supply of sticks which are beloved by dogs. The area has a marine and sea front feel to it and with urbanisation is likely to suffer from noise and parties. There is already evidence of bonfires. There have in the past been a few events with mud hovercraft type boats which are noisy.
19. Stroud District has a shortage of 'wild areas' for human access and it is recognised that these areas are important to wellbeing and mental health, and for some offer an essential escape. The Severn area towards and around the Pill is a rare wild place that will lose that special character if it is backed by an urbanised area.
20. The number of visitors to the wilder areas cannot be measured by the number to the picnic site. The Sharpness area is very well endowed with a number of open green areas which are easier to walk, very good for letting dogs off leads and have nearby parking. The area has a very relaxed and informal feel. However, many of these open walking areas are within the docks and the marina development zones and will be lost. The number of visitors to the estuarine areas will increase exponentially as other areas are lost and some people try to find solitude.

Water Voles

21. The Berkeley Pill leading toward the Severn estuarine area is home to much wildlife - there are animal tracks. In particular there are water voles and I know this for certain because I came across one near the path; the water vole was suffering from a head cut which seemed to have been caused by nearby discarded metal.

Ancient Green Lanes and Woods

22. There are also other locally important wildlife habitats which will be immediately adjacent to the development and within the green spaces area. This includes the footpaths/green lanes bounded by ditches and hedgerows and traversed by animal tracks, some leading into the wood. In the spring and summer this area is an explosion of a variety of wildlife - plants and insects. It is another magical place. A new development will not only directly threaten this area and the biodiversity of the whole area but will cut off this area from other wildlife areas in most directions. This especially matters as it is already bounded by the Severn area.
23. In the late summer, Hemlock Water Dropwort is a very prolific plant in this area. This is great for insects but bad for humans and pets (dogs can dig it up to eat). It can be mistaken for turnips but is incredibly

poisonous in all its parts. It cannot be removed without destroying the lane and hedgerows too. It may spread naturally or by contamination to gardens. It may appear elsewhere due to long dormant seeds. This is an area where there may be conflict between nature and humans.

24. An increase in visitors and pets to this area will also cause unacceptable habitat damage and disturbance.

Urbanisation and Visitors

25. It is becoming more and more apparent that the effects of human activity have been far, far greater than previously known or anticipated. It isn't just about endangered species but also about numbers of insects, soil quality, plants, food chains etc.
26. I am very concerned about the threats of urbanisation of the area and the increase of visitors to the Severn due to urbanisation, and also the council's intended promotion of tourism.
27. These are many and include:
 - Direct loss of habitat, drainage, flooding, barriers, water/soil/air pollution, litter, noise, parties, bonfires, fireworks, pets, vermin, litter, trampling, wilful disturbance, invasive species, tourism, footpath erosion, fly tipping, and more.
28. Even with the current relatively low level of visitors, litter and plastic, especially food packaging, can be seen blown beyond fences and in the areas of high tide roosts.
29. There will also be a lot of effects from the construction which will go on for years. There has been a lot of litter and all sorts of rubbish (some large) blown from the current Persimmon site.

Cats and other predators

30. Cats are a particular concern. The evidence of my own eyes is that some cats do wander a long way from home. Very recently, in late December, I took a photo of a domestic cat that I spotted scurrying into the high tide roosting area between the docks and the marina. On my next visit, I saw a different domestic cat prowling around and a long way from any homes.
31. I have previously seen a fox going along by the water edge below the dyke to the south side of the power station. This is away from the proposed development but does show foxes will visit the estuary area and urbanisation may attract more foxes to the Sharpness area.

Access, Conflicts and Mitigations

32. There will inevitably be conflicts between urbanisation, leisure and nature. Education will only be able to achieve so much and not enough - otherwise many ills would not exist on the scale they do. And there will simply be too many people in the area. If the council is thinking of restricting access to areas which are currently open, or charging for parking or to visit areas which are currently free, then the council should be upfront and honest with the public and locals at this stage. The same applies to dogs on leads and owning cats. Is the council thinking of putting up more fences and barriers? If there is a warden, how will that be funded? The council is very silent on mitigation methods.
33. Paying money towards a beneficial project to make up for damaging effects is not necessarily mitigation. The project may happen anyway and the damage has been done and may not be undone by the project.
34. There is a conflict in using an attractive location by the Severn to justify a new town but then denying access to most of that area because it needs protecting.

35. There is conflict and dishonesty in promising open green spaces as new if there will be a loss of other open green spaces due to development and urbanisation. Furthermore, the new open spaces will be much busier, not so close to the water, not so wild, not so extensive, and without the sense of freedom.
36. The only sensible solution is to keep the area's population low and not to encourage tourism.

Overall Planning Strategy

37. Berkeley is currently having a new housing estate built which is a large addition relative to the size of the town and surrounding area. The PS33 area of land which is on the northern edge of Berkeley and before the road to Sharpness is an acceptable site for development to meet the area's own future needs (if there will be no worsening of flooding). This area is walkable to Berkeley's facilities. If the school building at Wanswell is no longer required, new housing or a new school on that site seems reasonable.
38. The other areas around Sharpness, Newtown and Berkeley are unsuitable - in so many ways - for large scale development, a new town or urbanisation. This refers to PS36 stages 1 and 2 and PS34.
39. This is for reasons:
 - Environmental
 - Economic
 - Social

Housing Demand, Allocation Formula and Location

40. There is no evidence that people want to move in large numbers to the Berkeley area. House prices do not support the idea that there is significant demand to move to the area. The area currently has a high score for access to housing.
41. The policy to build a large number of houses in the Sharpness-Berkeley area does not reflect the intention of the government's policy and formula. The area looks mainly to South Gloucestershire and Bristol for employment and many services. House prices in Berkeley are lower than comparable places to its south. Sharpness in particular is a relatively affordable area compared to prices in other locations in the district (especially rural ones) despite the better paid jobs in Bristol and South Glos compared to Stroud and Gloucestershire. Given the idea of the formula is to build where houses are less affordable relative to earnings, choosing Sharpness-Berkeley for a large number of houses does not make sense. This is especially true given the large number of houses to be built in the nearby Thornbury area.
42. From Berkeley it is 14 miles to Aztec West, 18 miles to Gloucester, and 25 to Cheltenham. That is too far away from the large urban areas and facilities for most people. It is an expensive commute for low paid jobs. There are not enough jobs in Stroud and Dursley/Cam for their residents already. Urbanising a rural hinterland midway between Bristol and Gloucester is not going to improve the situation.
43. The country already has lots of small market towns which rely on commuting out for employment, have struggling high streets and shops, and poor public transport. Yet Stroud wishes to build another small town with yet more shops in a rural hinterland and expects it not to have the same small town issues.
44. The topology of Berkeley's location and connectivity to other places means it does not make sense to locate a new town in the area. The town is close to the Severn on a dead end spur from the A38. The A38 junction is halfway up a corridor bounded by the Severn to the west and the Cotswold edge to the east. There are only two directions to go: north or south.
45. The aims of the eco town are admirable but very idealistic and ambitious. The concepts need to be tested and proven. A remote rural area with restricted geographical connectivity is not the place for that, or an ordinary new town.

Transport

46. Many people will not walk or cycle far, or at all in bad weather. Buses work better in large urban areas with shorter distances. They need to run very frequently, at all hours and be cheaper before people will abandon cars. Public transport initiatives need to be proven in existing urban areas first. Being called an eco town will not make the majority of people any different, especially given its distant location. Social engineering and changing behaviour needs to be proven in existing urban areas first. People will still get old, have young children, have heavy shopping and loads, be adverse to bad weather, adverse to other passengers, and want to travel around and out of the wider area for various purposes. In a rural area, many leisure destinations are well away from main roads. The Sharpness/Berkeley new town area (PS36) area is very exposed and windy. I say this as someone who has cycled to work and is willing to walk far more than most. I am also actively trying to encourage local use of the limited public transport we do have.
47. Electric cars may ultimately encourage more journeys. Self driving cars are likely to encourage more and particularly longer journeys, and to encourage taxi rather than bus use. It is difficult to predict and wrong to make sweeping assumptions to justify a major development in a rural area. Sharpness-Berkeley is not the place for an experimental or vanity project.

Local Road and Rail Issues

48. There are a lot of shortfalls with the local roads already:
- a) The footpath to the power station and college area has fallen into a very unfit state despite the new 'flagship' sites there. The path is unpleasant to walk along: being single file, muddy, flood prone and splash prone. Cars come by too fast and close. Hardly anyone walks it and I've not seen cyclists using this road. Upgrading this path and creating a cycle way here would be a good starting point for the council to show that it can get people out of cars before making such claims.
 - b) The narrow, historic Berkeley High Street will become a nightmare rat run. Closing this road would be very tricky (which is probably why that has not been done).
 - c) Traffic from the new development to the power station and new college area will pass through Berkeley town centre along with all other traffic to that area. This will be detrimental to the historic town. The college has a fair number of 'racers' already.
 - d) There is currently no train line. If Berkeley station is reopened, it has now been confirmed that trains will not be able to run to Bristol. Being off the mainline, the services will be more restrictive in hours and frequency.
 - e) Cam & Dursley station is already at capacity with more housing planned there. This is already deterring people from using the trains.
 - f) The A38 and the M5 junctions will not cope and will need huge investment. This is especially true of the Falfield junction. (However, I do not support a road building program but a different allocation strategy.)
 - g) The access to the A38 from Berkeley is already unsuitable for the Sharpness lorry traffic.
 - h) There is no footpath to the A38 or Newport. It is too dangerous to walk that road..
 - i) Alkington lane with its blind bend and constant roadside subsidence is frankly dangerous already.
 - j) The quickest route from Berkeley to the A38 south is down the High Street via the narrow back road to Stone. That route has its own blind bend at the junction to Rockhampton.
 - k) The other country lanes through areas such as Breadstone will become busy rat runs.
 - l) Due to Slimbridge's geography, the road routes north are dependent upon the A38.
 - m) When the M5 is closed, the A38 is the only alternative route.

Employment

49. There is no evidence that the area can attract employers and jobs in significant enough numbers. There are not that many people employed in the Sharpness Docks area. There are already many, many more workers living in the area than there are jobs. The developer told me that these people work in Bristol and employers have not been attracted to the area because they are not the right type of people! Apparently, the developer has employers interested in his eco village but would not even give me any clues as to their business/industry sectors. Oh no, can't do that but, "Trust me, I'm a planner"! The power station / college area and the docks area have struggled to fill capacity and use land already set aside for economic use. The new warehouses at Sharpness do not appear to have many people there but do get lots of lorries.
50. The clear long term trend is one of increasing urbanisation around the large urban centres and big cities. This is where employers most want to be and also where most people, for various life stage and career reasons, want or need to be. It's a reinforcing thing and a Catch-22 that will make it very difficult to create a significant number of new jobs in the Berkeley area, especially skilled jobs or in the tech sector. There are many examples but here are just some:
- a. The difficulty of recruiting GPs in rural areas, especially remote ones
 - b. GCHQ opening an office in Manchester because Cheltenham does not appeal enough to the young.
 - c. HMRC closing many offices in quite large towns and opening larger offices in city centres so they can recruit despite those cities being much more expensive
 - d. The way tech and engineering companies cluster geographically despite competing with each other for the same skill sets - employees move to where they have multiple options and employers to where they have a large recruitment pool. Jobs changes are more frequent. Most small tech employers either disappear or get consumed by large ones who close the small sites.
 - e. The job market is less secure and much more transient now, with more frequent job changes and more contracting or temp work.
51. Even if the council does attract sufficient employers to the area, people will still commute out of the area but will also commute in, further adding to traffic. The developer's idea that the people who live in the new settlement will largely be the same people as work in the settlement is very unlikely to happen.

Planning Strategy and Site Selection Policy

52. The original decision to identify the Sharpness-Berkeley area for a new settlement should be revisited because a number of things have changed or were not in place when that decision was made.
- a. There were Gloucestershire CC talk and plans regarding a new Severn crossing which would be road and rail and have a new M5 junction. That road bridge has now been ruled unviable, so the M5 junction is no longer planned.
 - b. A rail/cycle bridge to Lydney is now being explored but is uncertain. Since the main driver for a rail bridge is to have a backup to the rail tunnel under the Severn near Bristol, even if viable it may not be the preferred solution and get funding.
 - c. The evidence required regarding the Severn estuary habitats (effects and mitigation) is not in place.
 - d. The evidence, knowledge and public conversation regarding the environment, climate change and biodiversity has moved on at a fast pace in recent years.
 - e. The site was first chosen for an allocation of around half the number of houses now proposed (5,000).
 - f. The government is about to replace the EU farming subsidies with a different system which will encourage nature, new habitats and biodiversity. This means the feasible alternative and best uses of the land should be revisited. This particularly applies to the area closer to the Severn.
 - g. The change in the public mood regarding the environment also means that the best potential use of the existing flat farmland bordering the Severn area should be reassessed. A nature reserve could happen without the development.
 - h. The plan did not take into account that the Sharpness and Berkeley area looks mainly toward South Gloucestershire and Bristol for employment and other journeys.

- i. The plan has not taken into account the very large number of houses to be built in the Thornbury area just a few miles to the south of Berkeley, and the extra pressure that will create on the route into Bristol.
 - j. The Severn bridge tolls have been removed. This has resulted in moving housing demand from Bristol to South Wales and increasing traffic into Bristol from the M4/M5 interchange. This affects the feasibility and demand for housing in the Berkeley area.
53. Given all of the above, the drastic effect of a new settlement and the timescales to 2050, it does not make sense to go ahead without reassessment and reconsideration.
54. The site comparison and selection seems to have not been based on a comprehensive assessment of any potential sites in the district to find the best solutions, but sites in an 'available' list which seem to contain sites primarily put forward by developers and landowners with a self interest.
55. The SA objective ratings show a number of reds and other negatives but there are no scores: there are a number of question marks. Given the missing scores and evidence, I do not see how the assessment and comparison of sites and options can be valid.

Alternative Strategies and Locations

56. A policy of dispersal mixed with concentrations of housing close to a) the main, large towns (employment centres) and b) the two mainline train routes and the motorway junction would be much more appropriate.
57. Concentration as above would provide housing near to jobs and public services, better attract employers and skilled employees, and help Gloucestershire to attract/keep young people in the county. It also makes providing good public transport much, much more viable.
58. Dispersal can provide more affordable housing in many small settlements which are relatively expensive but need invigorating. It can be used to support rather than strain existing services.
59. Unless any new settlement away from the main centres is built quickly and with a lot of funding for infrastructure, schools and other services to be delivered upfront (when low utilisation will make it expensive to run), then the settlement is not going to be a good place to live for most types of households. It will also overwhelm existing small centres like Berkeley and the local schools (Dursley) and have a wider detrimental effect. There is no evidence the new settlement will have such funding and investment, neither from the outset nor further down the line.
60. An eco settlement would have a much greater chance of success if placed close to a larger town centre where the new settlement would be less isolated and less distant from existing employers and services etc, and where there is a larger established urban area better able to absorb shocks and growing pains.
61. If Gloucestershire is concerned about attracting and keeping young people in its workforce and economy instead of losing them to places like London and Manchester, then it makes much more sense to build a place within or adjacent to Gloucester or Cheltenham which can have a modern city vibe with higher density housing and can genuinely not require cars. I suggest that Stroud look at something like this in Whaddon, and look at working with Gloucester to use the area to house more people by using mid-rise apartments. This would also provide the one bed and two bed homes which the growing number of small households need. Apartments with lifts and views could also attract people who want but cannot afford a bungalow. If the incinerator can be built, why cannot mid rise? If Gloucestershire wants to create a super city, then mid rise or higher should be considered - and how it can be done well and tastefully.
62. There is also no evidence that Stroud District Council has done enough to try to secure Whaddon for Stroud's housing quota, or done enough to try to get the quota for Stroud reduced due to special circumstances (including geographical and environmental).