

PS34 Reg-19 Response to Stroud Local Plan 2021

PS34 - Sharpness Docks - is unsound. It is not justified, not effective, and not consistent with the National Planning Policy Framework (NPPF). It has not been positively prepared. BER016/17 is also **legally non-compliant**.

The reasons for all the above are outlined below:

1. Road Access to the Tourist Resort & Housing
2. Japanese Knotweed
3. Working Dock, Resort & Residential
4. Impact on Severn Way & Current Alternative Walking Route
5. Vindicatrix Camp Area
6. Sharpness Docks Local Wildlife Site
7. Severn SSSI, SAC, SPA & Ramsar Site and the Sharpness Shoreline
8. Storm/tidal Surges up a Funnel Shaped Estuary are Exponential
9. Ammonium Nitrate & Tsunami/1607 floods
10. Sharpness Picnic Site & parking
11. PS34 Not Suitable
12. Process
13. PS36 is Not Legally Compliant
14. Suggested Changes to Local Plan

***** IMPORTANT NOTE: This PS34 Response is accompanied by Photo Evidence which is to be uploaded in a separate PDF file** (and as separate image files if I can do that when I do the online Form).

1. Road Access to the Tourist Resort & Housing

Sole access to the 300 houses, retail, hotel, holiday lodges, campground, watersports, equestrian centre and other tourist infrastructure is to be via the Oldminster Road. Much of that traffic will rely on the High Level Bridge as the only route to the resort and housing on the island area.

1.1 Oldminster Road

Oldminster Road is a residential road running through Newtown and Sharpness villages. This is very much a family area (being relatively affordable). As well as many homes with only on road parking, many of the local amenities are on this road - the playground, tennis courts, football pitch, village hall and church hall. The entrance to this road passes under a railway bridge.

Oldminster road is no way suitable for an increase in traffic, let alone the level proposed. It is already tricky for cyclists.

1.2 High Level Bridge

The High Level Bridge is relatively narrow and not suitable for two-way traffic, nor for one way traffic plus a pavement and cycle lane. It will not support sustainable or healthy travel.

The High Level Bridge is a functioning swing bridge so at times there will be delays getting into and out of the resort and queuing traffic.

The High Level Bridge offers the best view of the docks and the estuary. Although open to cars, very few cars use it. It is in practice used mainly by pedestrians (and cats and dogs). With traffic going over the High Level Bridge, one of the main reasons to visit this area will have disappeared.

Between Oldminster Road and the High Level Bridge, there is another bridge which crosses over very low, wet ground and is closed to traffic but used by walkers and cyclists - it is part of the Severn Way. The Local Plan intends a new road to go down under this closed bridge - into the flood prone dip - and then steeply up to the High Level Bridge. I am not convinced this is realistic.

1.3 Dock Road to the Low Level Bridge

Despite it being a private road, the road around the dock to the Low Level Bridge is currently the access route used to all the island area. Not surprisingly, there are issues with larger numbers of the public using this road and so the Local Plan is proposing the Oldminster Road and High Level Bridge route instead.

In addition to the lorries, the dock road is particularly dangerous for cyclists due to rail tracks diagonally crossing the roads in more than one place. (I am not the only one who has become a cropper there.)

2. Japanese Knotweed

The High Level Bridge has a Japanese Knotweed problem below up against its base. There is also Japanese Knotweed in the area below the bridge by the canal where development is planned, and in the area by the track to the lifeboat station. The latter grew from soil that was dumped there from clearing a nearby area. The Local Plan ignores this issue though it affects deliverability.

3. Working Dock, Resort & Residential

There will inevitably be conflicts of interest between the working dock and residents and tourist businesses. The working dock can be noisy and dusty. Ships in dock sometimes have their engines running. The dock stores dangerous products. Houses near the Low Level Bridge were demolished as the area was considered unfit for residents due to health reasons (dust). The prevailing wind goes from the docks towards where the canal side development will be.

4. Impact on Severn Way & Current Alternative Walking Route

From Sharpness picnic site, the Severn Way going north takes a long roadside detour through Newtown before crossing the High Level Bridge which is almost traffic free and has superb views.

There is currently an alternative route which is not a right of way but used by locals. This goes over the lock gates and through pleasant brownfield sites gone over to meadows and scrub. With an increase in visitors during lockdown, the docks had problems with people straying and I saw threats of closing the route as a result. This seems likely to happen with the numbers from PS36 and visitors to PS34.

The development of PS34 will result in a degradation to the Severn Way and the loss of another local route of high recreation and amenity value.

5. Vindicatrix Camp Area

The area that was the Vindicatrix Camp has rewilded itself and is now wooded and has become a local amenity providing short woodland walks and heritage and botanical interest.

The Vindicatrix Camp was not a holiday camp as portrayed by the Local Plan. It was built there out of necessity after the Training Ship Vindicatrix was moved from the Thames to the relative safety of the Sharpness canal at the start of World War II. As the need for Merchant Navy crew grew during the war due to heavy losses, the ship was too small and so the camp was built to house the trainee lads. There is now a memorial to those lost by the entrance and Vindi Boys continue to visit. Some ruins and original pathways remain amongst the trees.

Other than this wooded headland/cliff, there is no other woodland along this side of the eastern the Severn shoreline for several miles north or south. It may act as an important steppingstone for Wildlife. Even if some trees remain, there will be a huge impact on the landscape. Due to a bend in the canal towpath, the site of the Vindicatrix Camp is a major landscape feature for many miles. **Please see Image 5 of my Photo Evidence.**

The site should not be cleared for a camp for heritage, memorial, landscape, local amenity, and wildlife reasons.

6. Sharpness Docks Local Wildlife Site

The Local Plan does not acknowledge the importance of the Sharpness Docks Local Wildlife Site which is within PS34. This Local Wildlife Site is special for its nationally rare plant species and is a core part of the Nature Recovery Network. This omission is not compliant with the NERC Act and NPPF policies 174 a & b. A development that destroyed or degraded the Local Wildlife Site would also not be compliant with the Council's own strategic policy SO6.

7. Severn SSSI, SAC, SPA & Ramsar Site and the Sharpness Shoreline

***** Please see Images 1, 2, 3 & 5 of my Photo Evidence *****

7.1 Concerns & Birds at Sharpness

It is sometimes forgotten that the Severn protections apply to fish species as well as birds. The quality and quantity of the whole food chain plus secure habitats - including supporting habitats on functionally linked land - are essential for survival. Recreation and Urban impacts of PS34 are a very real concern.

There needs to be allowance for the habitats to move or new ones to be found in adaptation to climate and coastal change.

Please see the 2021 HRA at 2.29, 2.30 & 5.6 for expansion of the above paragraph.

The Severn Estuary (Stroud District) Visitor Survey Report 2016 states in 5.6 that the area around Sharpness Docks has relatively high numbers of bird records and is subject to high levels of visitor pressure around the Marina and Picnic Site.

7.2 Shoreline from Severn entrance/Tidal Basin to Lifeboat Station/Old Dock

Much of the stretch of shoreline from the tidal basin to the old dock runs below a relatively low cliff edge. Along the top are brambles and shrubs obscuring most of the edge but there are a couple of excellent viewpoints. Although not marked as rights of way (although I understand the OS map is to be updated to show additional rights of way in the Sharpness area), there are several footpaths which are popular with locals walking through this area of scrub and wildflower meadows.

Below the cliff edge here is a stretch of saltmarsh with some reed bed. The bird survey used by the Visitor Survey 2016 identified this area as important for bird roosts. The current Local Plan and HRA more or less ignores it. Even if due to the working docks not all the Sharpness area is within all the designated zones, this area is certainly supporting habitat and functionally linked land. **Please see Images 1,3 & 5 of my Photo Evidence.**

7.3 Recreational & urban impacts in cliff area

There will be recreational and urban impacts from PS34 on this on this immediately adjacent bird habitat area and on the Severn estuary itself. There will be an increase in visitors from PS36 as well as within PS34. Mitigation methods are not detailed but pushed down the line. Drones are not mentioned. The HRA has not adequately considered this area despite PS34 being immediately adjacent to the Severn i.e., zero metres away. The HRA has overlooked the roosting area below the cliffs and any supporting habitat or functionally linked land role that the area above the cliff might have. At spring high tides, the area below the cliff may be flooded and birds will need to seek a new roost inland.

The Visitor Survey Report 2016 in the evidence does not include its maps but I found some here by googling: <https://www.stroud.gov.uk/media/2903/severnestuarymaps020616.pdf>

7.4 Mitigation for area below cliffs

The HRA is very dismissive of the threat of new urban and recreational impacts simply because there is already some dock activity in the area. Well, a) there is no dock, industrial or business activity close to these habitats; b) the dockside activity does not involve many humans, those humans are working rather than exploring the place, and the behaviour of people at work is vastly different to the behaviour of tourists, visitors, residents, and pets. The type of visitors at present are generally local walkers, birdwatchers, canal boaters and heritage visitors. The type of visitor attracted by a tourist resort and holiday camp will be hugely different in behaviour, including noisier, shrieking, and sometimes drunk.

Very few people go to the area below the cliffs, but it is quite easy to access if one knows how. There are some viewpoints overlooking it from the cliff edge and no doubt these will be a key attraction within the tourist resort, and so will draw noise, litter, and lights. Cats do go there, and I have seen that with my own eyes. I have also seen cats crossing the High Level Bridge and even with daytime traffic they will do so at night. **Please see Image 1 of my Photo Evidence.** It is not as if I am there much of the time or looking out for cats.

No doubt foxes and dogs can get there too. Once people see a trail or others there, more people will follow. The area has no beach, and the foreshore can be dangerous, especially with the mud and tides. Will the council now decide to erect barriers everywhere? It will look more like an MOD site than a tourist spot.

We have seen in lockdown the surge in litter and other impacts caused by an increase in visitors.

7.5 Old Dock Basin & Watersports

The Local Plan intends to turn Old Dock into a watersports facility. This area is on the Severn Way and for locals and visitors alike this area is a favourite spot with high amenity value. It is exposed with expansive views to the estuary northwards, has an edge of the world feel and provides a welcome escape from the daily grind. There are lilies on the Old Dock, currently used by water birds but not boats or swimmers etc. To turn this into a watersports tourist attraction will take away an important amenity for recreation and both mental and physical health. **Please see Image 5 of my Photo Evidence.**

*NPPF Section 15 - Conserving and enhancing the natural environment
180 (b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason;*

7.6 Shoreline from Old Dock to Purton

From Old Dock, the Severn Way follows the canal towpath past the marina and with expansive views of the estuary northwards. This is a great place to watch birds. Once past the marina, between the canal towpath's wall/sea defence, there is an area of reed bed and beyond that an area of Salt Marsh can be seen from satellite images to be peninsular. Waterfowl can be heard in the reed beds and there are also ground nesting waterfowl out on the salt marsh. Due to its very intertidal nature the salt marsh is a patchwork of sub habitats, each with its own plants, colour, and texture. There is a lot of expensive sea aster out there which will attract foragers. **Please see Image 5 of my Photo Evidence.**

7.7 Recreational & urban impacts in canal area

The canal area is particularly vulnerable to litter. Rubbish thrown over the wall cannot be retrieved but will be moved by high tides. **Please see Image 2 of my Photo Evidence.**

It is also easy to walk to this salt marsh if one knows how. Trails can be seen on satellite images. Once people are seen out there - and it is very visible from the towpath - more will explore.

The area of the Purton Hulks has become much better known and visited since the popularity of TripAdvisor. The footpath there has gone from being narrow grassy ways to a wide muddy mess. **Please see Image 8 of my Photo Evidence.**

It is also vulnerable to human disturbance and noise from visitors and residents - noise will easily carry across the canal.

I attach a photo taken of two swans comfortably roosting by the canal path wall/defence at a high tide. After I resumed walking along the canal path towards them – and another person came up behind me – the swans got up and left the area. Clearly the birds did not perceive that the wall kept them safe and out of my reach - what we think of as a safe space or sufficient mitigation may not seem so to the birds and so causes disturbance and loss of otherwise suitable habitat. E.g., Just the sight of a cat across the canal may have an impact. **Please see Image 2 of my Photo Evidence.**

7.7 Mitigation for area beside canal

The Local Plan and HRA are very bare of assessment and mitigation regarding urban and recreation impacts on this stretch of shoreline. There will be an increase in visitors from PS36 as well as within PS34. Mitigation methods are not detailed but pushed down the line e.g., construction noise. There will also be further impacts from increased use of the canal and expansion of the marina.

The Local Plan relies on cats being across the canal from the Severn. The waterside on the inland side of the canal and on the eastern side of the entrance to the docks are very much used by various species of water birds. Along the canal a little further north of PS34 there is a lake area off the canal on the inland side. Access to this lake area is blocked to boats and it is extremely popular with the waterfowl assemblage. It is within easy reach of cats, dogs, and foxes from PS34, being on the same side as where most of the housing will be. **Please see Image 1 of my Photo Evidence.**

7.8 Water pollution

2021 HRA states:

7.12 Natural England's Site Improvement Plan for the estuary identifies water pollution as a current threat and as a future pressure on the site.

7.9 Flooding & High Tide Roosts

The spring high tides are close to flooding the Old Dock and Marina area of the canal even without a storm surge. **Please see Image 3 of my Photo Evidence.**

For PS34, Stroud Level 2 Strategic Flood Risk Assessment Appendix P states:

Page 69 Flooding of the northern and eastern boundaries of the site is recorded to have occurred in July 1968 from the tidal River Severn.

Page 69 The northern boundary and western corner of the site, which border the River Severn are identified as at risk of integrated fluvial and tidal flooding during a 1 in 100, 1 in 200 and 1 in 1,000 tidal flood event on the River Severn.

Page 71 The site is likely to be impacted by climate change...climate change is likely to increase the risk of fluvial and tidal flooding to the site.

In a flood scenario, the birds will be forced to move to higher roosts inland i.e., on the opposite side of the canal. This is currently farmland but as part of PS36 it will be housing. PS34 will cause the loss of important supporting habitats.

PS34 will take away flexibility for the birds to find supporting habitats and new functionally linked land as sea levels rise and storms increase with climate change.

Looking at the flood maps, it could also be that when the River Severn is in flood (as opposed to tidal flooding), the mudflats and sand in this area on which birds go in the day for food or safety will not be exposed at low tide. Therefore, birds need nearby supporting habitats and functionally linked land in the Sharpness area, including farmland opposite the canal.

7.10 Mitigation pushed down the line

The urban and recreational impacts on the Severn SSSI, SAC, SPA and Ramsar Sites have not been adequately identified. The site is immediately adjacent to the Severn. The mitigation included is inadequate with most mitigation being unresolved and pushed further down the line with an assumption that anything and everything can and will be successfully mitigated.

With the government's proposed changes to the planning system meaning there may be no scrutiny late on, this leaves the Severn habitats and wildlife at threat.

8. Storm/tidal Surges up a Funnel Shaped Estuary are Exponential

The funnel shape of the Severn Estuary is what causes the second highest tidal range in the world. Research based largely on the Severn Estuary and published in 2018 has shown that this funnel effect also causes the additional tide height caused by a storm surge to increase exponentially as the surge moves upstream. This means that a storm surge combined with a high tide could be very bad at Sharpness.

See <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6203349/>

Uncertainty in estuarine extreme water level predictions due to surge-tide interaction

5. Conclusion

Variability in the storm surge component of total water level needs to be captured accurately to reduce uncertainty in site specific hazard assessments. This is especially the case in hyper-tidal estuaries, where the tidal range may exceed 6m, and the surges can be amplified towards the head of the estuary, increasing flood risk in that region.

This research has shown that maximum surge elevations increase up-estuary, with surge curves displaying greater magnitude and shorter duration. A total water level prediction for a location up-estuary, which is estimated using down-estuary tide gauge data, could lead to total water level being under-predicted, and will have consequence for the duration that flood water may be able to over wash coastal defences. Local forecasting systems, which rely on accurate estimations of storm surge, should consider changes in surge elevation and shape with distance up-estuary from nearby tide gauge sites.

Regarding the devastating Bristol Channel Flood of 1607, *“in attributing the flood to a storm surge in their 2006 paper, Horsburgh and Horritt show that those proposing a tsunami hypothesis underestimate the volume of water and coastal damage involved in storm surges,”* (Wikipedia)

Regardless of whether the cause was a tsunami or a storm surge, there is no doubt that it happened - so it could happen again.

9. Ammonium Nitrate & Tsunami/1607 floods

There are two potential risks which may well be argued as being very small. However, they would have such devastating consequences that they should be taken seriously.

The dock area is used to store Ammonium Nitrate in quantities larger than that involved in the Beirut explosion. I understand that a report is on the way with new rules regarding development within range of such storage. It would have been prudent for the council to await this.

The Bristol Channel floods of 1607 happened regardless of whether one favours the tsunami theory or the storms surge theory. Such a flood could happen again.

10. Sharpness Picnic Site & parking

The Sharpness picnic site by the Severn is a small waterfront area for the size of the PS34 or PS36 developments and will become overwhelmed by either one of those developments alone. The picnic site offers different views to the resort area and is a spot for watching ships enter and leave the dock.

The adjacent rows of terraced homes may suffer disturbance from increased use of the picnic site. Some frontages open directly onto part of the site and the Severn Way goes past them.

There is also the issue of the Sharpness Picnic Site being a local community amenity with only a small car park. Newtown and Sharpness villages are walkable but set some distance away. Obviously, this car park could not cope with PS34 or PS36. There are no toilets there. The car park is locked at dark. There is no mention in the Local Plan of how this would be handled with such a step change in visitors. If parking charges were introduced, for some that would be a loss of a particularly important local recreational amenity of value.

People come to the Picnic Site and Severn Way to see the sunsets all year round. The sun setting on the Severn estuary/river will not be visible from the SANG area.

11. PS34 Not Suitable

PS34 will take away most of what is attractive about the area to current visitors and locals. The employment will be low paid and seasonal. The tourist resort and the housing so close to the Severn will have urban and recreational impacts on the Severn and wildlife. Flooding is a risk to the housing proposed near the canal and to existing roosting habitats, meaning the land to be developed is needed as a supporting habitat on functionally linked land.

PS34 is highly unsuitable for a tourist resort and the Local Plan vision is disconnected to the reality on the ground.

12. Process

Issues raised by many residents have not been addressed or taken into account by the council.

The evidence has been unwieldy to navigate and find with much of it buried away. The council could have taken some little steps to make the evidence much easier to find and quicker to access. For example, on the website each heritage document could be presented with a list of which sites are included. Publication dates could be included by each document. There could have been an evidence index for each site/allocation. The HRA documents and flood appendices could be organised by area. Many documents are exceedingly long and do not have hyperlinked contents and require lengthy scrolling. E.g., the 336-page Stroud District Employment Land Review 2021 which has only a bare skeleton contents page.

During the 2018 consultation I asked the council if they could present an indication of the relevant site or area by each response document so that one did not have to open and read every single one for the whole district (an impractical task). The council responded that they could not do that due to data protection rules. That does not make any sense as it would not be publishing any more information.

The timing on the vote and the short Reg 19 consultation length (initially only 6 weeks, extended to 8 weeks part way through) was unacceptable considering the pandemic and covid restrictions. There was no information on how to fill in the response form or, for example, how to present photos. The document on how to respond and offering more flexibility regarding having to do the response form was added with just 3 weeks to the deadline - this guide is biased and unbalanced as it includes ticks by all the questions.

Please also see my 'Not legally Compliant' section below.

13. PS34 is Not Legally Compliant

Stroud District Council's Regulation 19 Pre-submission Local Plan published in 2021 is not legally compliant with regards to the inclusion of PS34.

This is because:

- a) The 2021 The HRA was published on 23 May 2021, after Stroud District Council voted to accept the Local Plan and its supporting evidence on 30 April 2021.
- b) The Stroud Level 2 Strategic Flood Risk Assessment was issued on 20 May 2021, after Stroud District Council voted to accept the Local Plan and its supporting evidence on 30 April 2021.
- c) The Stroud Level Strategic Flood Risk Assessment issued in May 2021 states in 3.1.3 that updated guidance for flood-risk modelling is due to be released in 2021 and should be incorporated. Meanwhile it has used 2016 guidance.
- d) There has been a lack of sufficient oversight of the maps published in the various Flood Risk Appendices. This is evident from the screenshots including the department's chat messages.
- e) In the circumstances, it was an abuse of powers, unreasonable and disproportionate for the council to hold the vote when they did because:
 - i) The council elections were long overdue due to the pandemic restrictions and the local elections were shortly coming up on 6 May 2021 (some councillors who voted were not re-elected).
 - ii) Due to covid restrictions since the last consultation, residents did not have the opportunity to campaign. They were not even informed the vote was happening, not even those who had registered email addresses to be kept informed. It took people by surprise.
 - iii) There was no urgent need to proceed so soon, the Local Plan will have major, far reaching and permanent consequences for people and the environment and makes allocations (PS36 phase 2) up to 2050 (further than necessary).
 - iv) The HRA evidence base was awaiting key documents which were still in the pipeline and would be subsequently published for consultation.
 - v) The Stroud Level Strategic Flood Risk Assessment issued in May 2021 states in 3.1.3 that updated guidance for flood-risk modelling is due to be released in 2021 and should be incorporated.
 - vi) Due to continuing covid restrictions there has not been the opportunity for the public to make full use of the consultation period.
 - vii) The Local Plan is being rushed through before government changes to planning policy which may rule out PS36 upfront or require more detailed and enforceable mitigation at the local plan stage due to the removal of scrutiny at later stages, and before the impact on the Local Plan of the Beirut explosion is known.

The late publication of the HRA is highly relevant to PS34 because:

- a) The HRA is extremely relevant to PS34 regarding the Severn SSSI, SPA, SAC & Ramsar site.
- b) It is a new 147-page document with new content.
- c) The mitigation strategy regarding the Severn and PS36 depends very heavily on the SANG. There are significant and serious contradictions between the May 2021 HRA and the Local Plan regarding what outcome is possible for the SANG as a recreation area.

The late publication of the Stroud Level 2 Strategic Flood Assessment is highly relevant because:

- a) Flooding is extremely pertinent to PS34 as the birds need supporting habitats and functionally linked land across the canal from the Severn.
- b) There is no earlier version of the Flood Assessment published in the evidence.
- c) The issued document is still incomplete i.e., *“Draft Final Report – Issue for consultation. Dialogue continuing with Environment Agency on SFRA outputs”*

14. Suggested Changes to the Local Plan

PS34 should be removed from the Local Plan.

THE END

