

HAMFALLOW PARISH COUNCIL RESPONSE TO STROUD DISTRICT COUNCIL LOCAL PLAN REVIEW ADDITIONAL TECHNICAL EVIDENCE, SEPT 2022

1. Thank you for the opportunity to comment on this additional information. We would point out that Hamfallow Parish Council embraces most of the proposed new development PS36 (Sharpness) in the draft Local Plan, and that we have commented before at every stage.
2. This additional information covers two important areas that we have commented on previously: The Sustainable Transport Strategy and flood risk assessment. Therefore, we are satisfied that we have the right to comment on this additional technical evidence.
3. Firstly, we note that EB108, The Sustainable Transport Strategy Addendum, provides very little new information regarding transport issues arising from the PS36 development. There is a repetition of earlier unjustifiably optimistic statements about reopening of the rail link from Sharpness for trains to Gloucester, but there is no supporting evidence for the feasibility of this. Indeed, we note that there is no response to the scepticism expressed in the earlier consultation by Network Rail on reopening this link, nor to the other responses on transport matters by Gloucestershire County Council and Stagecoach.
4. In the absence of any information from SDC dealing with the serious doubts raised by those statutory consultees we maintain that our earlier comments on the inadequacy of the STS in respect of PS36 still stand.
5. However, we now have **additional** serious concerns, in view of the comments in the document EB109 Transport Funding and Delivery Plan. In particular:
 - Table 1 and para 2.11, imply that the A38 improvement package, including the B4066, Alkington and Breadstone junctions may not be improved: “A38 corridor provides the opportunity to provide corridor based improvements to public transport and active travel modes”. We take this to mean that spending will be on public transport and cycling, instead of improved infrastructure
 - paragraph 4.1 indicates that National Highways (NH) are unlikely to fund the M5-J14 improvements. We have indicated in our previous responses that such improvement would be an essential pre-condition for this development.
 - paragraph 6.3 says that: “Due to the strategic nature of the mitigation required, there remains a level of uncertainty around the funding mechanisms and timing”. We interpret this to mean that no funding has been agreed. The following paragraph says that ... “it would not be appropriate for Stroud District to delay its Plan to allow external plans to develop”.
6. From the above points, it seems clear to us that there have been no significant developments in the STS that would address our concerns over the inadequacy of transport links and infrastructure for the PS36 development. The District seem determined to press on with their plan despite there being no evidence that the infrastructure improvements necessary for its successful implementation will be forthcoming. This is extremely unwise.

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7. The EB110 Infrastructure Delivery Plan (ITP) Addendum reinforces our concerns, expressed above, about lack of clear progress on transport infrastructure. Paragraph 2.1.1 admits that concerns about the capacity of A38/M5 corridor have been raised by South Gloucestershire Council and National Highways, without committing to any realistic solutions. Indeed, Table 1 suggests that sustainable transport strategies may avoid the need for physical mitigation measures. In our view, this is completely unrealistic.
8. The ITP also touches on one of the other issues that we have commented on before – flood risk and mitigation. Paragraph 3.6.2 recognizes that the site is only protected from a 1 in 100 year flood from the River Severn and essentially unprotected from flooding by the Little Avon. Such flooding has occurred in the recent past. No solutions are suggested, other than the developer contacting the Environment Agency. We are certainly not aware of any substantive proposals by the EA to improve these flood defences within the timescale of this proposed development.
9. In conclusion, we have found nothing in these new documents to reduce our concerns as previously expressed, particularly in respect of transport and flood risk. In fact, our concerns have increased as a result of your apparent determination to press on without any evidence that transport infrastructure will be adequate.
10. Finally, we wish this and our previous responses to be made available to the Planning Inspector, to have our response acknowledged, and also wish to attend the Planning Inquiry.

Hamfallow Parish Council
October 2022