



24 January 2019

Local Plan Review
The Planning Strategy Team
Stroud District Council
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Dear Stroud District Council

Additional Comments in response to the
Stroud District Local Plan Review Emerging Strategy Paper
with regard to
The Berkeley Cluster

I phoned the council on Monday morning to check my email had been received. I mentioned that I had run out of time last week and so unfortunately had not been able to complete my environment section. I was informed that the council would process any additional comments received this week and that the council are keen to acquire local knowledge.

As someone who is a frequent walker along the banks of the Severn and has been for a fair number of years, I do have particular local knowledge to impart.

The Severn and its Foreshore, Wildlife Areas, Protected Areas (European Marine Site, SAC, SPA, Ramsar and SSSI) and immediately adjacent areas.

1. The large, wild grassy area on the shoreline beyond the ship graveyard and reed beds (between Sharpness Marina and Purton) is currently largely undisturbed by people but is much more accessible than it looks from the canal path. It is actually quite easy to walk out there to the water's edge and tramp over a large area, much of it being firmer ground than one might expect. There are ground birds nesting there as well as in the reeds. Within this area, there are various sub habitats which are extremely localised as can be seen by changes in vegetation. In the last few years, the ship graveyard has had more visitors (unfortunately, it is now on TripAdvisor) and as a result it has changed a lot - from grass to mud - and I have photos to prove it. With a greater population in the nearby area, this wild area will rapidly be under great threat, especially with online photo sharing and the like.
2. The large area of wild, grassy shoreline between the Sharpness picnic site and Berkeley Power Station is only lightly walked at present. Most walkers are dog walkers at the Sharpness end. It is very rare to see non local people there. Regular access for locals is currently limited by the initial walk required from the Berkeley end (housing areas, college, power station, and parking) plus the tricky footpath (slippery, muddy or overgrown, subsiding) from the road to the fields. At the Sharpness end, there are currently lots of other good open spaces which are more accessible and better drained. There is also a high stile on entering the shoreline area, and another one half way along that is more a gymnastics challenge than a climbing aid. What I am saying is that the number of human visitors to this area is currently pretty low but this will change drastically once there is a) new housing closer to the Severn, let alone the amount of

housing planned, and b) the alternative footpaths and open spaces which are in the development areas at Sharpness and NW of Berkeley are gone.

3. There are extensive parts of the grassy shoreline and protected area that are in danger of becoming victim to foragers and badly damaged. I can point to at least two areas where an expensive and fashionable wild food is freely growing over a wide area and would be very lucrative and easy to gather. This would disturb wildlife, including ground nesting birds, and the ground would be widely trampled away from paths. (I can be more specific only in strict confidence.) Furthermore, there will be further as yet unrecognised and unknown threats e.g. foraging of the common reed which is highly edible, especially in spring, but hasn't had much publicity yet (presumably because its habitat doesn't exist in many places).
4. I read in an academic research paper that the evidence is that the earliest humans to settle in the UK settled in upper estuary/low river flood plains because the abundance of food - plants and animals - was such that it outweighed the danger and devastation of frequent flooding. The common reed is thought to have been a key food staple. The flood plain areas of the vale should be treated with at least the same respect as the Cotswold AONB.
5. Housing so close to the Severn will create problems of:
 - a) noise pollution for wildlife (the building site then traffic, music, people);
 - b) garden chemicals - pollution carried into the ground and affecting insects;
 - c) vehicle pollution;
 - d) fire and barbeque smoke and pollution;
 - e) fly tipping;
 - f) chlorinated water run off into sensitive environment (from hosepipes etc)
 - g) water run off carrying pollution into the Severn;
 - h) depletion of local ground water due to development and diversion of rainfall to sewers;
 - i) predatory pets (cats, dogs, etc);
 - j) other problems I haven't thought of yet;
 - k) and other problems no one is aware of yet.
6. In the relatively short period of two decades that I have lived in the Berkeley area, I have observed some changes in the ground levels of parts of the foreshore and nearby areas, noticeable by changes in vegetation. The bands of habitats as seen by different vegetation can be quite narrow as they are dependent on the underlying wetness or the frequency of tide cover. I have observed that the habitats can be rather niche and their differences are subtle and often seemingly the same to humans. As the river naturally changes its course over time or rises due to rising sea levels, if there is development close to the Severn, or more sea walls or paved areas are built, then certain habitats will have nowhere to go and will get squeezed out of existence.
7. The local plan may claim the people of the district think development should be in the M5 corridor but the questions that need to be asked are:
 - a) How many know very little of the area beyond what they see whilst passing along the M5 (or the A38 at best)?
 - b) How many are trying to divert development away from the most populous area where the majority live?
 - c) How many meant or interpreted the M5 corridor to mean areas more adjacent to the M5 and close to existing junctions, not the banks of the Severn or a quiet, rural hinterland?
 - d) How many know that the Severn is a protected area, and that this protection puts onto the local authorities special, stringent responsibilities which extend into zones 400m and 1km beyond the protected area? And that there is an even wider mitigation zone?
 - e) How many know and how many understand why the Severn is of international importance and environmentally protected?

- f) How many would continue to support the creation of the new settlements - or even any development so very close to the Severn – if they were better informed of the environmental issues and the protection situation?
 - g) How many would support the council committing to further pursuing a strategy which will knowingly involve spending large amounts of council tax payers' money on environmental consultancy and legal fees in an attempt to meet the obligatory research and mitigation requirements and ultimately has a very uncertain and precarious outcome?
 - h) How many within a 'green aware' district support the council being cavalier, uncaring or overly optimistic towards an internationally protected environmental area?
 - i) How many would support going down a route by which the authorities will eventually be faced with the inevitable and divisive dilemma of forbidding public access to riverside and countryside areas or allowing further irreversible and illegal environmental damage?
8. The Habitat Regulations Assessment (HRA), pages 21, 24 and in particular page 25 have maps 1, 2 and 3 that show just how adjacent and close the Berkeley Cluster development area is to the protected areas: it is almost entirely within the 1 km zone and about half is within the 400m zone (with some of it adjacent). These maps are buried deep in the information and show the threat to the protected area much more clearly than does the main local plan document. Looking at map 3 on page 25, the Berkeley Cluster plan just beggars belief. How can the council be serious?
9. The table on page 31 and 32 clearly confirms that the Sharpness Docks and nearly all of the other Berkeley Cluster areas are within the 400m zone which means that the development plans will need in depth assessment and screening for likely significant effects on the protected areas.
10. Section 6.4 of the HRA states, "It is for the competent authority to gather the information and evidence necessary for the appropriate assessment to give them certainty that adverse effects will not occur." So the onus is on the authorities and the bar is going to be very high: it is generally far more difficult to establish that something doesn't exist than it is to establish that it does. The question is how far does Stroud District Council intend to go down this road and how much money will it spend in doing so?
11. Section 5.4 of the HRA states, "There is now a strong body of evidence showing how increasing levels of development, even when well outside the boundary of protected wildlife sites can have negative impacts on the sites and their wildlife interest. Work ongrasslands....estuarine and coastal sites... demonstrates links between housing, development and nature conservation impacts. Sections 5.6 and 8.4 are admissions that there is a lack of a sufficient evidence base for the Severn Estuary functionally linked land.
12. Stroud District Council should note that between Gloucester and Severn Beach/Chepstow, there is currently little development close to the Severn on either side, and there is no large settlement. That shows a wisdom of the past that should be retained. Compared to the new settlement plans, Thornbury, Berkeley, and even Lydney are all set relatively well back from the Severn. The docks had to be on the water. Newnham is quite small and on a cliff top. The new developments planned for around Thornbury are well away from the Severn. Stroud should take note as the new settlements will be out of place and out of character for the area.
13. The Stroud District Council should take note of the direction of travel of scientific research and evidence, and growing concerns about rising sea levels, bio diversity, climate change and habitat loss. Given how much has changed in the last 20 years, things will harden a lot before 2040.

Yours faithfully, ██████████