

The Planning Strategy Team  
Local Plan Review  
Stroud District Council  
Ebley Mill  
Stroud  
GL15 5UB



21 January 2020

Dear Planning Strategy Team

### **Stroud District Local Plan Review – Draft Plan for Consultation**

I wrote to you a year ago at the Emerging Strategy stage expressing a number of key concerns about the proposed development at Sharpness (PS36). I know that some of the views I expressed were by no means unique and there was a reasonably healthy response from the Berkeley and Sharpness area according to your own data. Yet no account appears to have been taken of (or any response given by the Council to) any of the responses to the so-called consultation.

I could, therefore, simply copy what I said last year with some minor alterations, but for ease I will summarise my arguments and also attach my original submissions.

My principal objections can be paraphrased as follows:

Emerging Strategy - gaps and omissions in strategy development, assessment process and evidence base, which invalidated and rendered premature the Council's emerging strategy choice and the site allocations upon which that relied. The lack of evidence was explored in detail in the schedule (your reference 550b) accompanying my letter last year. Although some of the requested evidence has now been provided to accompany the Draft Plan, I firmly believe it should have been available at the Emerging (sometimes referred to as Preferred) Strategy stage.

Sharpness (PS36) – case not proven: gaps and omissions in strategy development and assessment and in evidence base relating to need, site related constraints, sustainability, deliverability and viability; conflicting capacity information; reasons why the site is unsuitable are well-articulated in the Council's own SALA 2018 and include: greenfield, internationally important biodiversity impacts, heritage, countryside and settlement impacts. The 'top 5 key issues' you identified as the public's main concern (without supporting evidence) in the Emerging Strategy paper would render PS36 as completely unsuitable.

Presentation of information – little or no cross referencing to relevant supporting documents and information in the Emerging Strategy Paper and the Draft Plan for Consultation, making it more difficult for members of the public to generate a full and meaningful response. Many studies were rushed out in November and placed unannounced on the Council website. This supporting evidence should have been available at the time of the publication of the Emerging Strategy. The maps both in the

main documents and those at the roadshows were unclear and difficult for residents to properly gain a perspective.

'Hybrid' option selected at Emerging Strategy stage was not subject to a full Sustainability Appraisal at the time and was therefore not accurately tested against the four original options. The subsequent SA has been produced after the fact in an attempt to justify a decision already made. By not publishing key studies until shortly before (or at the same time as) the Draft Plan, this option had effectively morphed into the Council's settled position and from which it was therefore unlikely to reverse, whatever the evidence, with all the time and cost consequences, given that PS36 is at the heart of the strategy.

Lack of transparency and detail – in marked contrast to other sites, at the Emerging Strategy the Council relied almost entirely on developer marketing material with all the hyperbole that entails. Since then, there are many contradictions between the statements made by planners and developers as to, in particular, any infrastructure improvements.

Democratic deficit – for many of the reasons given above, consultees have been asked to comment on a strategy and sites without being given enough information in a timely fashion to properly understand or challenge the Council's position.

This is supposed to be a democratic exercise but you have turned it into a box-ticking exercise simply going through the motions to push through what you had already intended. However, it appears you have ticked the boxes in the wrong order, or missed some out. Previous evidence demonstrating that the area was unsuitable for large scale development has been ignored or changed at the last minute to suit. Quite frankly, it smacks of complete arrogance on the part of the planners, and a complete contempt for the views of the public.

There is a strong impression that this development is a fait accompli and some of the local population, especially those in the older generation, feel there is no point in objecting as it will just happen anyway. I sincerely hope they are wrong as I am convinced the scale of the proposals is quite inappropriate for the area but just as importantly what is supposed to be a public exercise in genuine consultation has been turned into a mere sham.

I would ask that this submission is placed before the Inspector at the appropriate time.

Yours faithfully,

 