

## Part B – Please use a separate sheet for each representation

Name or Organisation: **Falfield Parish Council**

3. To which part of the Local Plan does this representation relate?

Paragraph	2.3.7 2.3.20 2.3.24 2.9.10	Policy	CP2 CP4 CP5 CP6	Policies Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

This Local Plan is not sound and is not positively prepared in terms of the impact on existing communities. Whilst it caters for the need of the major new garden communities and employment areas created, it does not adequately mitigate the detrimental effects on existing residents and existing communities impacted by the proposals.

Road traffic generated by the two large housing developments located at Sharpness (2700 dwellings rising to 5000 by 2050), Wisloe Garden village (1500 dwellings), Cam (1080 dwellings) and Berkeley (170 dwellings) plus 22 hectares of the strategic employment growth ranging from large warehousing, distribution units, offices and industrial units is earmarked to rely the existing A38 to travel to access the M5. During construction and occupation, as the majority of journeys will be car dependant a significant proportion of this traffic will use the part of the A38 that lies to the south of these developments nearest existing M5 junction 14 or along the A38 itself to and from Thornbury and Bristol. South of Gloucester, it is the only major A road west of the M5 and east of the river Severn. Almost all other alternative road routes in the area are small rural lanes.

South of these proposed developments are a number of existing historic communities which are bisected by the A38, for example the villages and hamlets in and surrounding Newport, Woodford, Stone and Falfield. In parts it is a residential street and a significant number of dwellings are located directly beside the A38 with residents having to cross and rely on the A38 route for their daily needs.

The A38 bisects our parish and the village of Falfield and some residents live in very close proximity to the roadside. They currently report problems with increasing road noise, particularly at night, which is significant enough to disrupt their sleep and cause stress. At certain times traffic congestion affects their ability to cross the A38 safely, or access and egress their properties and plan their own activities during busy periods e.g. school and bank holidays or when part of the M5 is closed for scheduled maintenance or a traffic accident. The A38 is frequently used as the M5 relief road and can be brought to a standstill at such times. The recent removal of the road tolls for the two Severn Bridges into Wales has added significant HVG traffic onto the M5 and the A38 as a relief road.

Paragraph 2.3.24 identifies that ***“the increased levels of growth will put additional pressure on our roads” and that “the need for highways improvements at M5 junctions 12, 13 and 14 together with improvements along the A419 and A38 corridors. Such improvements will be required whatever the pattern of growth envisaged”***. Unfortunately, whilst being considerate of the highway system itself and the public transport offer, this plan does not consider the environmental amenity and quality of life needs of the existing communities further down the road from the new strategic sites who will bear the brunt of the cumulative output of the additional traffic generated by these new developments, i.e. increased road congestion, increased road noise and poorer air quality. Whilst noise attenuation measures and landscape buffers are within the plan for the proposed communities located near the A38 we are not aware of any mitigation measures or improvements for the existing established communities who will be adversely impacted.

For our existing communities located along the A38 the reverse situation of core Policy 4 Item 3 is likely to occur for them unless they are given the same environmental consideration as new residents i.e. *“Create safe streets, homes and workplaces: where buildings are positioned with landscaping to define and enhance streets and spaces.....reduce car domination of the street and reduce vehicle speeds; provide shared or social spaces on the streets”*. Addressing the environmental needs of existing residents impacted by the developments still needs to be addressed and designed into the plan.

Our parish of Falfield is located just south of the Stroud District Council border in the adjoining county of South Gloucestershire. We already experience negative traffic related

impacts from the recent increase in development in our own county in and around Thornbury. We are not aware of or have been asked to be involved in any cross border co-ordination regarding mitigation of the additional impact these significant developments north of our border will definitely have on our parish. We are located exactly at the pinch point where the traffic output from all the proposed developments at Berkeley, Cam, Dursley, Kingswood, Newtown / Sharpness, Wisloe and Renishaw New Mills gather to access the M5.

It is not an appropriate and justified strategy as it stands. Paragraph 2:3:30 states that the strategy will require improvements to the strategic infrastructure at M5 Junction 14, this junction is actually outside the Stroud District Council border, it is partly within our parish and our village of Falfield is located in very close proximity to this motorway junction. Drivers need to drive through our village to access and leave the motorway junction via the A38. This motorway junction is already operating at beyond capacity; our Parish Council have had no consultation on traffic volume modelling or on what the suggested improvements to this junction or the A38 in our parish will entail in terms of strategy, scale, timescale or the impact of prolonged construction works on us in terms of disruption.

We are disappointed that the possibility of creating another M5 junction nearer the new communities is not explored in the plan. Given the current overly long distance between M5 Junctions 13 and 14, the fact that junction M5 14 is already operating beyond capacity and the regularly frequency that this part of the M5 motorway needs to be closed due to accidents or maintenance requiring motorway traffic to divert onto the a38 this would make sense. A new junction would benefit to Stroud District Councils new residents and would help mitigate the negative traffic effects on existing communities.

We are not convinced that the plan is effective and deliverable over the plan period up to 2040. Paragraph 2:3:4 states that larger sites have more potential to fund major infrastructure schemes and are more likely to attract public funding. There is no proof of this assertion, no indication on whom will provide the funding and exactly what major infrastructure is proposed.

The creation of some new transport interchanges and additional rail stations at Stonehouse and Sharpness is welcomed; however the timeframe for implementing them is still unclear and given that we will bear the brunt of the road traffic this causes us concern. We are aware of other branch lines being promised in the region as a mitigation for major development e.g. at Portishead but 30 years on the housing arrived yet the rail connection is still awaited, a repeat of this scenario is unacceptable.

We stress that there must be a clear timetable and strategy for such key infrastructure to be in place prior to the strategic house building commencing. The effects on of not doing so in a timely way in terms of the adverse impact on our road system and existing residents and communities would be very detrimental. These railway station schemes or the changes to M5 J14 are yet to be added to the timetabled works plan for Highways England or Network Rail, they are clearly some way off implementation.

We strongly object to the premature inclusion of reference to the Buckover Garden Village within the neighbouring county of South Gloucestershire within the text in Paragraph 2.3.20. The JSP for the WECA region was previously rejected by examining inspectors and withdrawn and the emerging new South Gloucestershire Local plan is still in its very early stages where

proposed strategic locations have not yet been finalised or even tabled for consultation, this plan is some years off receiving its own examination.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Whilst noise attenuation measures and landscape buffers are proposed for the proposed communities located near the A38 we are not aware of any mitigation measures or improvements for the existing established communities further down the road who will be adversely impacted by the vehicular output of the proposed major developments .

For our existing communities located along the A38 the reverse situation of core Policy 4 Item 3 is likely to occur for them unless they are given the same environmental consideration as new residents i.e. *“Create safe streets, homes and workplaces: where buildings are positioned with landscaping to define and enhance streets and spaces.....reduce car domination of the street and reduce vehicle speeds; provide shared or social spaces on the streets”*. Addressing the environmental needs of existing residents impacted by the developments still needs to be addressed and designed into the plan.

Another M5 junction nearer the new communities could still be explored in the plan, given the current long distance between M5 Junctions 13 and 14, the fact that junction M5 14 is already operating beyond capacity and the frequency that this part of the M5 motorway needs to be closed due to accidents or maintenance this diverting onto the a38 it would make sense. As well as being a benefit to Stroud Districts’s new residents it would help mitigate the traffic effects on existing communities.

There must be a clear timetable and strategy for key infrastructure to help minimise road use in place prior to the house building commencing. The effects on of not doing so in a timely way terms of the impact on our road system and existing residents and communities cannot be mitigated.

2.3.20 Reference to Buckover Garden Village within the neighbouring county of South Gloucestershire needs to be omitted from the text. The JSP for the WECA region was previously rejected by examining inspectors and withdrawn and the emerging new South Gloucestershire Local plan is still in its very early stages where proposed strategic locations have not yet been finalised or even tabled for consultation, this plan is some years off having its own examination.

(Continue on a separate sheet /expand box if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:



Date:

21.07.21