

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

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

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.

The Planning Inspector
Ministry of Housing, Communities and Local Government


20/7/21

Dear Sir,

SDC Lack of Compliance with Planning Process

Please find attached a document titled 'Summary of SDC Compliance to Planning Process' which details observations made by Wisloe Action Group (WAG) regarding Stroud District Council's (SDC) compilation of the current Housing Local Plan. Significant process failures and biased behaviours have been found which, when viewed collectively, suggest malevolent activity i.e. it's deliberate not accidental.

WAG is a local organisation made up from concerned residents which has been active for around two years in opposition to proposed site PS37 (Wisloe). WAG are not experts, but our recent engagement with professional consultants to help compile our Regulation19 submission has confirmed our suspicions regarding SDC behaviours, specifically relating to the inclusion of PS37 within the Local Plan.

WAG would appreciate your oversight regarding our concerns expressed in the attached document to determine whether they are well founded and therefore whether PS37 should be withdrawn from inclusion within the Local Plan?

Yours faithfully

[Redacted signature]

C.C

[Redacted signature]

Summary of SDC Compliance to Planning Process

Wisloe Action Group (WAG) is a local organisation which has been active for around two years in opposition to proposed site PS37 (Wisloe). The Group is made up of concerned residents who are not experts in the field of planning, we have had to learn as we went along. When we started on this journey we were acting under the assumption that land owners/promoters and developers try to get large developments accepted and typically residents try to stop them. The planning authority, Stroud District Council (SDC) in this case, would perform a role of independent and unbiased mediator between the two sides to ensure the optimum solution was arrived at, and in so doing would be impartial. Councillors would be guided by the SDC planning experts but of course would have the additional political pressures of party and local constituents to observe. During the past two years WAG has uncovered numerous examples where SDC has failed to follow due process or has made elemental mistakes and not corrected them. We will not list them all here as many are set out quite clearly in the main submission and detailing them all again is not the purpose of this document.

This document does not look at each mistake or process error in isolation but tries to take a more subjective holistic perspective regarding the collective nature of the failings. Viewed in isolation each mistake can be explained away, but viewed collectively they suggest a more malevolent activity maybe at play i.e. it's deliberate not accidental. We cannot submit a document like this without reference back to certain examples to help illustrate the points we make. These have been broken down into certain themes based around behaviours:

- Basic Process Errors
 - o Not engaging WWU as a statutory body until omission highlighted by WAG.
 - o Accepting proposers' land downgrading from 2 to 3b without reference back to Natural England
- Cover-ups/not correcting errors when mistakes were highlighted/exposed
 - o Secretly submitting an application to Homes England for 5000 dwellings at PS37 and not sharing the reasons for rejection
 - o Not correcting the SA score after belatedly accepting the proposers' land assessment was seriously flawed and land remained Grade 2 (BMV)

- Delaying tactics
 - o Not engaging Natural England until immediately before Reg19 consultation, over one year after it was highlighted by WAG and SPC as an issue.
 - o Accepting the lack of a Masterplan from the promoters, which should address the mitigation actions required, and default to a position that issues will be addressed at the 'detail planning stage'.
- Misrepresenting the facts
 - o Reporting the Jan 2020 Reg18 consultation findings as being from all sources, but which actually failed to correctly analyse email and letter responses.
 - o Placing equal weighting on comments for and against PS37 even though responses were over 90% opposed to PS37.
- Minimise active engagement with residents
 - o Failure to ensure responses were provided to the SPC and WAG submissions to the Reg18 consultation submission which raised major concerns with the PS37 proposal.
 - o Not alerting all residents who previously submitted responses to the earlier consultation nor engagement in advertising/promotion of the latest Reg19 consultation.
- Not discharging a duty for impartial professional oversight
 - o Not alerting SDC's own consultants to the known risks of flooding in Slimbridge and Cambridge emanating from the watercourses running through Wisloe.
 - o Failure to acknowledge proposer's heritage assessment was out of date, more recent discoveries greatly increase significance of Roman presence on site.

Fortunately, WAG has been able to utilise the FoI system to good effect and coupled with extensive investigative research has uncovered multiple instances where SDC has not followed due process. Conversely, during this period we have failed to uncover any instances where mistakes have been made in a negative sense against supporting keeping PS37 within the Local Plan. WAG has a database detailing all the issues/mistakes we have managed to identify to date and are happy to share this with you at the appropriate time as part of the hearing, should you wish?

It should be highlighted that WAG has held meetings, in person and virtually, with the SDC planning leadership where we took the opportunity to present and discuss the issues we foresaw regarding PS37. When viewed alongside the various consultation submissions it would appear these activities were pointless as the line from SDC seems to be that everything will be addressed at 'the detail planning stage'. As we stated at the beginning, WAG are not experts, but we have held the view throughout that some of the issues with the PS37 site were virtually insurmountable without a very significant investment in infrastructure. This expenditure would, of course, make the site significantly less attractive to any potential developer who would have to take on the infrastructure burden before they could make a decent return. We are now using experts in the field to assist WAG and SPC with our Reg19 submission and they are all confirming our worst fears and suspicions that indeed there are numerous areas where process and procedures have not been followed by SDC and it would seem PS37 is not Viable or Deliverable. The only thing it is, it would seem, is Available!

The approach taken by SDC throughout the Local Plan consultation process has been to carry on regardless. Indeed, as highlighted in the main submission, it would seem SDC had provided its backing for PS37 before any assessment has been published. From the outset the main submission shows the consultation process has been consultation 'in name only'. Repeating the consultation process several times over a 4-year period and ignoring the substantive responses and data from bodies like SPC and WAG is not consultation, it just creates the impression of consultation i.e. box ticking. It is inappropriate and incorrect for District Councillors to assume SDC has accounted for the responses to its earlier consultations. It would seem there has been a strategy by SDC to undertake 'consultations' several times but to change nothing significant relating to site selection. The more consultations that are made and the later it is left to change the site selection the more it creates the impression that the iterative nature of the process has accommodated all views whereas, in reality, nothing has changed. As the 5-year period to submission of the next Plan approaches, pressure on councillors begins to rise to accept the Plan as submitted and consulted upon numerous times, which puts councillors in a very difficult position – accept what's proposed or go back to square one! WAG's view is that PS37 was included within the Local Plan process before a full and meaningful assessment of the site had been

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:

To summarise and clarify the shortcomings identified throughout the process in more detail using a WAG database. Detailing them all in this document would have reproduced many of the issues outlined in the WAG main submission and would have been duplication. It is far preferable to present and discuss them in person once the context of the issues are fully appreciated following submission of the main documentation opposing the inclusion of PS37 within the Local Plan.

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:

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Date:

21/7/21
