

Response to Stroud District Council Local Plan Review June/July 2021

Objection to site allocation **PS36 Sharpness new settlement**

I believe **the Local Plan is not sound because it is not Justified.**

Infrastructure

- Roads – there is only one road into the development from the A38 which is entirely inadequate now, let alone for 5,000 new households. There is no proposal to extend the bypass from Mobley to the A38.
- Alternatives – As the District councils plan is to develop a “powerhouse” of work opportunities between Cheltenham and Gloucester the obvious action would be to build more homes in the north of the district to reduce commuting/access better infrastructure (in line with Stroud District Council Policy DCP1). At present 80% of the required housing is being proposed in the south of the district.
- Traffic impact – there is bound to be significant commuter traffic to Bristol and Gloucester, having a massive impact on the already heavily congested junctions 13 & 14.
- High cost of infrastructure delivery (re roads, education provision, flood risk mitigation, rail) likely to make it unviable
- No indication that the required infrastructure will be delivered early in the site development, even though this is an essential element of Garden City principles
- Evidence from consultees who would need to deliver the infrastructure such as Stagecoach, Network Rail, Gloucestershire County Council and Wessex Water cast doubt on the viability
- Rail link which forms a major part of the proposals for PS36 is highly unlikely to come into existence during the Plan period, if at all. Only goes north, no direct link to Bristol.
- Roads – would need considerable improvements to overcome current capacity issues. J14 of M5 – where majority of outbound commuting would go – already at capacity
- Late evidence – seems written to justify the plan – difficult for public to understand
- Buses – practically non-existent currently.
- Rail Links – Is it achievable to build a new station halt in Sharpness, with regular services to Gloucester? This would be extremely expensive including the additional work required on the line itself for it to be able to accommodate passenger trains. It is acknowledged that there won't be a direct link to Bristol. How would the already full to capacity station at Cam & Dursley deal with a further influx of passengers?
- Sustainability – are there are more sustainable locations in the District for development than Sharpness – with better transport links and access to jobs, services and facilities.
- Infrastructure – there is no evidence or guarantee that public transport, a new railway station, road improvements, health facilities, schools etc can or will be delivered.
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Education

- Local secondary schools already full
- No commitment to providing a new secondary school during the early phases
- no secondary school has been proposed until the second phase, i.e. after 2040. As anyone with school age children will know, secondary schools in the area are already full to bursting. The existing school at Wanswell would be demolished for housing despite new schools being needed if the 'garden village' development goes ahead.
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Health

- No dental surgeries or secondary or tertiary care providers in Berkeley Cluster currently and no provision in the Plan
- No social care provided for

Transport

- Area relatively remote, expected to lead to increased car use for commuting
- Almost non-existent public transport. No evidence that the plans for public transport are deliverable
- Unsupported claims that there will be fast coach connections

- Plan entirely reliant on rail link which would be northbound only, away from the main direction of current commuting; the council has provided no substantive evidence that the line and new station is viable and their first bid to government for business case funding failed; would require major investment at Cam & Dursley
- Would require major mitigation measures on highways, particularly at connections with A38
- Junction 14 at M5 already at capacity. Would add further pressure to Almondsbury interchange for commuters to Bristol
- The relevant parts of the highways network already under pressure and that is before other developments to the south of the district are completed
- Even if the claims for commuting via public transport were realised, how are residents to travel in the evenings and weekends for shopping and leisure?

Employment

- Employment – the Council has previously suggested this is not a good area for creating employment. What has changed? The long term plan for the district is for employment to be created between Cheltenham and Gloucester.
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- Wrong location for employers, given its relative isolation, too far from Bristol or Gloucester and the M5, constrained by River Severn to the west
- PS36 does not adhere to Garden Village principles, by the lack of employment opportunities in its immediate vicinity
- There are better existing and planned sites for a knowledge based business park, which is the aspiration for the land set aside for business use
- The more likely use for that land is warehousing, which only provides a relatively low number of jobs, and at low wages
- The developers have no established record of delivering commercial developments
- Site at the furthest point from the anticipated employment growth point between Cheltenham and Gloucester

The Environment

- The development will cover over 1,000 acres of greenfields. This is inconsistent with the climate emergency agenda. There is a general lack of evidence regarding the resulting impact on the environment
- Site is in close proximity to the Severn Estuary which is a Site of Special Scientific Interest (SSSI), a Special Area of Conservation (SAC), a Special Protection Area (SPA) and a Ramsar site – all of which should provide the area with protection against negative impacts. Insubstantial evidence provided as to how the impact will be avoided / mitigated
- The SSSI extends down the mud flats of the Severn as far as Thornbury, and this area should be included in the due consideration of the Plan's soundness
- Site is c. 1 mile from the internationally important Slimbridge Wetland Centre
- Proposed wind energy development could have impact on the birds and wildlife
- Limited evidence provided on the impact of increase in recreational use
- Likely decline in air quality through increased car use, in the absence of a realistic public transport option. The council rated this site as having no impact on air quality
- Wessex Water have concerns, saying they have no plans to improve sewerage treatment works that would be required
- Detraction from Berkeley as an historic centre. Coalescence with Sharpness and surrounding villages.
- Green fields – the whole development is on green fields and no brownfield land will be used. There is an irony of the developers promising to create a farm – on former farmland! In addition they can no longer take up CO2 or be used to feed the local population (again this contradicts Stroud District Council Policy DCP1)
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- Landscape – significant urbanisation impact on the unique estuarine landscape
- Coalescence – Existing communities will lose their character and identity as they merge into one large urban area.

Scale of development – this is out of all proportion to the area's needs. Some small scale development would be acceptable adjacent to Sharpness and Berkeley to meet local needs.

Flood risk

- Needs more detailed evidence
- Costs of flood mitigation unknown
- Some projections show flood risk likely to be far higher by 2050
- Current Environment Agency maps do not take into account rising sea levels as a result of the climate emergency
- Flood risk – although just outside a flood risk zone now, have the effects of climate change been taken into account? Once the fields have been built on they can no longer absorb rain water (again contradicting Stroud District Council Policy DCP1)
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Process

- The normal run of events is to collect evidence, from which a strategy emerges leading to selection of location. It appears the process has been reversed to make land that is available fit the Plan
- Consistent lack of reports delivered at a time or in a manner that would enable residents to digest and reach reasonable conclusions
- Lack of consistency or objectivity in the sustainability appraisals of the various sites, some changing over time
- Some appraisals based on the aspirations of the developers compared with existing facilities on other sites
- Appraisals of existing communities changed over time despite no change in circumstances
- Is the scale of the development deliverable in the Plan period, i.e. the number of houses to be built per annum achievable?
- The relatively remote location will add to logistical difficulties in building the site within the required period, while adding to the congested highways network
- Description in earlier stages of the Plan relied entirely on developers promotional material rather than objective assessment
- Lack of proper engagement with the public: only short periods of consultation, maps and diagrams opaque and confusing, public exhibitions were poorly advertised, lack of engagement with recognised public interest group, little attempt to make the process of submitting responses user-friendly, disenfranchising older or technophobic residents
- Results of consultations only produced many months after the end of that phase, consisting mainly of statistics and bland responses to main concerns