

Text of Hamfallow response to Stroud DC S19 Local Plan (extracted from online response form)

Question 7a

Firstly, we wish to make clear that we recognize the need for new housing and that Stroud District has been given an allocation of 5700 new dwellings by central government, which it needs to facilitate in the Local Plan. Secondly, we accept that most communities within the District must accept some further development if the District is to achieve the above housing allocation. However, we wish to strongly object to the specific proposal for the PS36 development at Sharpness.

This proposal, if realized, would see the building of 2500-5000 new dwellings within and in close proximity to Hamfallow Parish. This is completely disproportionate to the size of the existing communities of Berkeley and Sharpness/Newtown. It would change this area, between the A38 and the River Severn, from being predominantly rural with small settlements into an almost totally built-up area with at least three times as many dwellings as we have now. To call this a "garden village" is

intentionally misleading and is one of the reasons that we believe the Plan is not legally compliant.

Another reason for our objection is that it is clear that this Plan was modified, part way through the process, to include this proposal from the developers, rather than emerging from the principles, policies and data of a proper planning process. We now draw the Inspector's attention to how the "Emerging Strategy" which first included PS36 did not logically follow from the consultation responses SDC received at the "issues and Options" stage, but appears to have been manipulated at a late stage to "shoe-horn" in the PS36 proposal. Again, we believe this was an abuse of process and not legally compliant with the NPPF planning process.

Furthermore, we believe that the Plan as it relates to PS36 is unsound in several respects and that it has failed to justify this development. The grounds of our objections are as follows:

- Employment - A major feature of the Plan is the claim of increased local employment, through which it appears to justify not providing sufficient infrastructure for cars. On page 39 of the development consortium's prospectus, we see the statement: 'market signals have indicated that this is an attractive location for business growth due to its accessible location as well as being flat, serviceable land.'

We see no evidence of a significant demand from businesses to invest in the area, apart from large/low employment warehousing at Sharpness and the Berkeley Green college on the old nuclear site.

Indeed, we would point out that in SDC's 2011 "Potential locations for strategic growth" document, you questioned the viability of increased employment in the Sharpness area, in the following words:

'Very little market demand for employment development in this location: land has been allocated here... for more than 30 years and development has yet to happen.'

- Road infrastructure – as mentioned above, the proposed Sharpness settlement is relatively remote from any good road infrastructure. We wish to draw the Inspector's attention to the comments on the previous plan from the Highways Authority, Gloucestershire County Council: Text of Hamfallow response to Stroud DC S19 Local Plan (extracted from online response form)

- o "With regard to Sharpness, the basis of reinvesting in a port town is interesting. It is a highly distinctive area with very desirable characteristics. However, it is land locked to its west (by the River Severn estuary) and currently poorly connected to the M5/ A38 corridor to its east. If the resilience of this corridor is ever compromised or traffic demand exceeds its capacity, then Sharpness may be isolated for periods of time in transport terms. It is recognised within the plan that development at Sharpness and other sites is likely to depend on improvements to M5/ junction 14. GCC previously also raised concerns about junction capacity issues with the relatively minor highway network links from this area to the A38 corridor, though as stated above, we are unable to comment further on these issues, until the Highway Capacity Assessment for the Plan is completed."

The M5/A38 corridor is itself in poor shape to cope with the undeniable large increase in traffic from the development, particularly M5 Junction 14, as highlighted in the response of Highways England to the previous version of the draft Plan:

- o "The Council will no doubt be aware of the challenges and delays the preparation of the WoE JSP has encountered. This has the potential to impact on the delivery of proposed improvements to the M5 J14 associated with the proposed development in South Gloucestershire. However, we are not currently aware of any commitments by the relevant rail and bus operators regarding the new infrastructure and services, which raises concerns that the new settlement may be heavily dependent on the private car. This risks creating further pressure on the SRN particularly at M4 J14 and conflicting with the aforementioned objectives of the Draft Plan to reduce reliance on the private car and work towards a more integrated transport system as per Strategic Objective SO4. We would also suggest that the policies associated with this development allocation should reflect the requirement for the infrastructure to be secured prior to development commencing. This is to avoid a partial development being opened without the intended sustainable transport infrastructure being

provided."

So, it is clear that the authorities with responsibility for highways were highly sceptical about the viability and impact of the proposal for Sharpness, in the face of the unjustified optimism of SDC. We have looked at the latest Sustainable Transport Assessment published with the Plan but unfortunately, that gives very little confidence that the concerns above have been adequately addressed. Our specific concerns with that assessment are:

- Firstly, it is remarkable (page 32) that the greatest vehicle to capacity (V/C) reductions happen to be where the roads from the Sharpness development meet the A38, at Breadstone and on the A4066. We are invited to believe that the largest development in the District gives the greatest traffic reduction!
- Secondly, the reductions are minimal, 7% for the morning peak for the A4066 and 6% for the evening peak at Breadstone. This brings these junctions only just below full capacity.

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- Thirdly it is clear from the STS, that the reductions come almost exclusively from "modal shift", ie getting people out of their cars onto public transport. Apart from being inherently unbelievable, this is against all the evidence provided by GCC, Highways England, Network Rail and Stagecoach in response to the previous version of the Plan (of which, more later).
- Finally, there is a comment in the STS (page 31) that is revealing about the improbability of all this: "The STS sets out a strategic approach to achieving modal shift, with detailed measures to be developed by sites through the planning application process". So nothing is guaranteed in advance. The claimed "strategic approach" is nothing more than a vague aspiration to get this proposal through this stage of approval, with any possible realization of the claimed reductions depending on how firm Stroud District planners are with the developer when they receive a formal application. History gives us little confidence on that, otherwise we would now have the rail link that was a condition of planning for the Howard Tenens development at Sharpness some ten years ago.

- Public transport – as mentioned above, SDC appear to recognize that justification of this development (PS36) critically depends on demonstrating transport modal shift, walking, cycling or

use of public transport instead of private cars. Considering public transport, the developers, supported by SDC, have proposed a major modal shift to rail and bus for commuting. It appears to be conceded that the major employment hubs will remain in the Bristol and Gloucester/Cheltenham areas for the foreseeable future, requiring journeys of some 15 miles in either direction. We would point out that there are not just a few major employment hubs; businesses are widely dispersed around the towns of Bristol, Gloucester and Cheltenham in many industrial and retail parks. This does not facilitate use of public transport, which would require at least one change of transport from, say, Cheltenham Railway Station via bus to an industrial park, introducing further uncertainty and cost to such a journey from Sharpness. However, the major objection to the reliance of the developer and SDC's Sustainable Transport Strategy on modal shift to rail and bus comes from the suppliers of those services, as expressed in their responses to the previous Plan, below.

o Gloucester County Council comment: "GCC previously raised concerns that, given its geographic location, transport options and solutions for a new settlement in Sharpness may remain limited. While there is potential to extend bus services, these would have to be commercially viable, while providing attractive frequencies and minimising journey times, to provide a viable alternative to the car. The promoter material published alongside the draft Plan, makes some suggestions for public transport provision to the site, however, Sharpness will need to comprise significant volumes of development before it can begin to create a critical mass for viable, multi-modal transport and service provision. Phase 1 of delivery proposes 2,400 dwellings by 2040 and Phase 2 an additional 2600 by 2050. This level of development is unlikely to be sufficient enough to create that critical mass for investment in measures to support transport mode shift that would see the high levels of sustainable transport accessibility aimed for by the plan. In particular, demand for a Rail link at Sharpness will be inherently compromised. It is still not known whether there is sufficient network capacity to accommodate a new service to Gloucester from Sharpness or whether it is financially viable or value for money. In addition, the evidence provided suggests that approx. 60% (AM) and 40% (PM) of trips would be made into south Gloucestershire and Bristol, which would not be served by the introduction of a direct link to Gloucester, but Text of Hamfallow response to Stroud DC S19 Local Plan (extracted from online response form) would have to change at Cam and Dursley Station. GCC is undertaking some further modelling work, to understand the viability of a new rail service from Sharpness to

Gloucester via Cam and Dursley and we will feedback the outcomes of this modelling exercise, once available. It is also understood that Network Rail is currently looking at the line capacity between Sharpness and Gloucester for additional services which will also be crucial evidence to understand the viability of the proposed rail link. Even if it is demonstrated that there is network capacity, it must also be demonstrated how this would impact upon Gloucestershire's wider ambitions for increasing frequencies on other regional or high speed services."

o Network Rail comment: "I see from the Sharpness Vale: natural neighbourhoods plan that you are looking to re-open the rail line at Sharpness to passengers and build a new station. It should be noted that whilst Network Rail is happy to work with the Council and developer to progress this, until the various feasibility (sic) studies have taken place, including how this would fit within the timetable we can not guarantee (sic) this would be plausible (sic). Should the provision of this service and station be feasible (sic) this would be subject to third party funding."

o Stagecoach are extremely sceptical about the developer's proposals for an express bus/coach service: "We note the comments at paragraph 3.55 regarding Sharpness: "However, Sharpness is isolated in its location so would require a range of transport modes to serve external trips" (our emphasis). We have already made plain to the Councils, as a major rail and bus operator (including of trams and tram-trains) that we see no business case for such links, principally because this very isolation means that they could not credibly offer enough residents a sufficiently attractive and relevant choice to begin to defray the very high fixed costs of operation, whatever delivery model was used.

We agree with the statement in the document that the score for Newtown and Sharpness is "surprising" and suggests, along with a wide variety of other anomalies discussed in Section 3.26- 3.30, that the methodology actually obfuscates rather than exposes the important distinctions in accessibility. So concerned are we with the methodology, that we have no confidence whatever in the SRFSU, with regards to sustainable accessibility.

Thus, the clear test set out in NPPF paragraph 102 is that the overarching strategy and strategic allocations must demonstrate that this "genuine choice" of sustainable modes exists or demonstrably can be provided. If not, the strategy, or site option, can only be considered car dependent, and this demonstrably unsustainable.

We have significant problems with the factual accuracy of some of the SRFSU data and scoring. Whitminster is seen as “poor” while Berkeley, Sharpness and Newtown are seen as “good”.

At PS36, Sharpness, the site was assessed on the basis of a rail station (with indeterminate level of service) and express bus routes. The Sharpness promoter now accepts that neither is deliverable in the Plan period to 2041. The result is, most importantly, the conclusions of the SALA and the SA about the sustainability impacts of the proposed Sharpness allocation PS36 are now open to the most fundamental challenge, from first principles.

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Rather than pursue a “dead end” option at Sharpness, the wider deliverability of which must also be considered immensely challenging, we urge the Council to return to the core logic set out in its own evidence base: to examine the case for growth at the most sustainably located Tier 3a settlements, alongside the identified Sustainable Movement Corridors, where these demonstrably can meet the requirements set out at Paragraph 102-103 of the NPPF 2019."

(Further, informal, contacts with Network Rail indicate that there are unlikely to be any additional paths for passenger trains from the Sharpness branch.)

- Flooding – As a Parish Council for the area of proposed development PS36, we are well aware that parts of it have a history of flooding, some very recent. We are also aware that there are no plans to improve the flood defences of this part of the River Severn and the current flood banks only give 1 in 100-year flood protection. The flood risk assessment supporting the Plan makes clear that flooding will become more frequent in reasonable climate change scenarios, which will substantially increase flood risk for this proposal:

- o The site is at low to moderate risk of groundwater flooding, with a 25-50% chance of groundwater emergence within a given 1km² grid square, during a 1 in 100 event.

Along the western boundary of the larger site there is an embankment that protects against fluvial/tidal flood risk from the River Severn, which entirely defends the southern land parcel against flooding from the 1 in 100 flood event on the River Severn. The limit of defence does not extend to the northern land parcel. The south west of the site remains at risk of flooding from the Little Avon.

The site is likely to be impacted by climate change. The extent of the 1 in 100 + climate change flood event for the upper end (+70% and +80% fluvial / to 2125 tidal) is greater than

that of the 1 in 100 event within the site, which indicates that climate change is likely to increase the risk of fluvial and tidal flooding to the site.

Environment - This development will destroy over 1,000 acres of valuable agricultural land. This is inconsistent with the climate emergency agenda and is contrary to sustainable development principles. Once lost this can never be replaced even if it later becomes needed for local food production, as seems increasingly likely. The mitigation proposed will not compensate for the encroachment on the SAC, SPA and RAMSAR sites and the presence of some 10,000-15,000 new people in close proximity. The proposed diversion of the Severn Way national footpath inland to the east of the development will not provide significant mitigation but will seriously detract from the amenity of the footpath for walkers.

As mentioned in our earlier response to the 2018 "Emerging Strategy", we found that the air quality assessment relating to this development was plainly wrong and showed every sign of being forcefitted to a desired outcome. It is a matter of common sense that there will be significant reduction in

air quality as a result of increased car journeys arising from the development, rather than the fictitious "minor improvement" cited in the Sustainability Report following the aspirational, but unbelievable, major modal shift scenario it espouses.

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☒ Safety - In our earlier response to the "Emerging Strategy" we raised the important issue, not mentioned in that or any subsequent version of the Plan, of the location within 1 km of a major intermediate level radioactive waste store. While we are not suggesting this presents a major safety risk, it is clear from the response of the Nuclear Decommissioning Authority to the previous version of the Plan, that they are concerned by SDC's clearly deliberate decision to exclude any mention of it in their plans:

"Having reviewed the available information, the NDA and Magnox have significant concerns regarding this element of the Draft Local Plan. These concerns include the following:

- A lack of evidence and assessment of the potential impacts arising from the proposed housing allocation on the operational requirements of the NDA and Magnox in the short, medium and long term;
- The potential pressure on transport links in the area arising from the proposed housing allocation which may reduce or restrict movement of large plant or materials from the NDA's Berkeley site; and

- No consideration of the long-term intergenerational requirements and impacts of activities on the NDA Berkeley site over the next 70 – 100 years which will include remediation activities which may be regarded as a nuisance to sensitive new developments – such as housing.

On the information provided within the consultation there is no information on how the proposed housing allocation will respond to and mitigate these requirements."

"It should also be noted that the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPiR 2019) categorise the Berkeley site (the former power station part of the site) as "Category 4" meaning an Outline Planning Zone (OPZ) extends 1 km from the site, with a Strategic Offsite Plan managed by Gloucestershire County Council. Given the relative closeness of the proposed Newtown/Sharpness settlement to the Berkeley site it has been assumed that the proposed allocation has been discussed with the Gloucestershire County Council Emergency Planning team – although there is no evidence to suggest this has taken place."

We also raised wider, non-safety, concerns in our previous response, as follows: "...this waste will remain on the Berkeley site for the foreseeable future and the perception of prospective purchasers on risk levels may be very different from the reality. A factor like this, that could reduce the selling price of these properties could adversely affect the solvency of the developer and their ability to deliver agreed infrastructure improvements."

Finally, there remain real safety concerns over the storage of ammonium nitrate fertiliser at Sharpness docks. This is regulated as a lower tier site under the Control of Major Accident Hazards (COMAH) Regulations, even though the quantities of Ammonium nitrate stored are greater than that which caused the massive explosion in Beirut in 2020. We have been raising this worrying discrepancy with the HSE and Department of Business, Innovation and Skills for the past year, but have yet to receive a satisfactory explanation.

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These are further regrettable examples of important matters being completely excluded from this Plan where they are inconvenient and show that this proposal has not arisen from careful consideration of all the factors relating to this site, but rather the proposal has been inserted midway through the process and piecemeal assessments done subsequently in an attempt to justify it.

The NPPF (paragraph 67) requires that local planning authorities should have a clear understanding of the land available in their area and should prepare planning policies which identify a sufficient

supply and mix of sites – taking into account their availability, suitability and likely economic viability. Given the lack of evidence in respect of the Sharpness site it is not clear how the Council have met this requirement.

To summarise, it is view of Hamfallow Parish Council, for all the reasons outlined above, that the Plan is unsound and that the proposal for development PS36 has not been justified.

Question 7b - Modifications suggested to make the Plan legally compliant and sound

This proposal is fatally compromised by the incompetent way in which it has been pushed into the Plan despite not being favoured in the first consultation and without a supporting evidence base.

Therefore, the only acceptable solution is to restart the Local Plan Process from the beginning, implement it legally and appropriately, and see if anything like PS36 emerges.

These are the aspects that would need to be established to give any prospect of approval for PS36 by the Inspector, as part of the Stroud Local Plan:

- Full costing and commitments to delivery of the necessary transport infrastructure, specifically improvements to M5 Junctions 13 and 14, completion of the Berkeley bypass and roundabouts onto the A38;

- Assessment of flood risk as less than 1/1000 years in accepted climate change scenarios over the next 100 years;

Commitment of the key infrastructure providers, ie Wessex Water, Severn Trent Water, Western Power, BT, Gigaclear etc to provide the necessary infrastructure for the full development before or as it is built;

- The commitment of Western Power must be to provide rapid electric car charging points for each dwelling;

Commitment from public transport providers (Stagecoach, Network Rail etc) to provide a high level of service to the development from the start of build to 10 years after completion;

- Full protection of the Severn Estuary SPA, SAC and Ramsar sites without diversion of the Severn Way footpath.

- Inclusion in Gloucestershire County Council's emergency response plan for the Berkeley Nuclear Site under the REPIR 2019.

Hamfallow Parish Council – July 2021