

Stroud District - Pre-submission Draft Local Plan: Regulation 19 consultation - response form

General Advice

Declaration

I have read and understand the general advice

Contact details

The Council can not accept your representation without a first and last name. Any representations received without this will be marked invalid. Putting an X in the E-mail required field is a declaration that you do not have an email contact address and have provided alternative telephone contact details necessary for the administration of the Local Plan Examination. *these fields are required

Title	Mr
First name	Tim
Last name	Knight
Organisation	Berkeley and Sharpness Residents' Action Group (BaSRAG)
Client name (if applicable)	-
E-mail	contact@basrag.com
Phone number	-
Address 1	-
Address 2	-
Town	-
Postcode	-

Site allocations - Berkeley Cluster

Q1. Would you like to make comments on one of the site allocations in the Berkeley Cluster?

Yes. Please go to Q2

Q2. Do you consider the site allocations within the Berkeley Cluster section of the Stroud District Pre-submission Draft Local Plan to be:

	Yes	No
Legally compliant (see definition on Council web page)		
Sound (see definition on Council web page)		X
Complies with the Duty to co-operate (see definition on Council web page)		

Q3a. Do you support or object to site allocation BER016/17 Land at Lynch Road, Berkeley?

I do not wish to make a comment. Please go to next question

Q4a. Do you support or object to site allocation PS33 Northwest of Berkeley?

I do not wish to make a comment. Please go to next question

Q5a. Do you support or object to site allocation PS34 Sharpness Docks?

I do not wish to make a comment. Please go to next question

Q6a. Do you support or object to site allocation PS35 Land at Focus School, Wanswell?

I do not wish to make a comment. Please go to next question

Q7a. Do you support or object to site allocation PS36 Sharpness new settlement?**Object**

Please give details why you support or object to PS36 Sharpness new settlement, referencing any legally compliance, soundness or duty to co-operate matters. Please be as precise as possible, referencing specific wording, paragraphs, policies or maps, as appropriate.

The Berkeley and Sharpness Residents Action Group (BaSRAG) is an action group representing the concerns of local people about development proposed in the Stroud District Local Plan Review between Berkeley and Sharpness in the Berkeley Cluster We are particularly concerned about the Council's proposals for a 'growth point' between Sharpness and Berkeley - allocation PS36 - in a so-called "garden village" of initially 2,400 houses but leading to 5,000 houses by 2050. The group was formed following locally organised residents' meetings held in both Sharpness (Dec 2018) and Berkeley (Jan 2019). A website has been set up by local residents to help keep the local community informed of local planning and developments - <https://basrag.com>.

We believe that meeting the housing needs of the district is poorly served by the proposal to allocate approximately 1,000 acres of greenfield land for a new settlement of 2,400 houses (rising to 5,000 houses by 2050), at Berkeley-Sharpness. This approach does not accord with the second key issue, (set out on page 11 of the Pre Submission Plan), of concentrating housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure. It lies outside the key movement corridor of the A38/M5 identified in the Local Plan. Furthermore, it is not consistent with concentrating employment growth within the A38/M5 corridor and at locations in tandem with housing growth.

This proposal does not meet the requirements of para 72 of the NPPF. The proposal is not well located and the design, whilst in its infancy, does not appear to address adequately the environmental harm it will bring. The infrastructure requirements for this proposed development are extensive and will be expensive putting the viability of the proposal, and hence delivery, at great risk. As the author of the Place Alliance/CPRE report (A Housing Audit for England) issued 21/01/2020 (see <https://indd.adobe.com/view/23366ae1-8f97-455d-896a-1a9934689cd8>) has acknowledged, many developers cannot be trusted to deliver on their 'promises' but put profit before design, including the delivery of appropriate amenities. No guarantees or safeguards have been put in place for this proposal about design, infrastructure, transport etc. There is little to no community support for this proposal. The economic potential of the area is poor relative to the more established towns in Stroud and in particular the Gloucester-Cheltenham focus promoted in the wider County economic strategy (see <https://www.gfirstlep.com/downloads/2018/sep-2-update2018v3.pdf>). There are unlikely to be net environmental gains. Employment within the proposed community itself is unlikely to attain a decent degree of self-containment. Access is not good to nearby larger towns and out-commuting is likely to continue or worsen. Garden City principles are referenced in the Plan but not enshrined in policy.

In addition we have had concerns about the whole process of plan making conducted by the District Council. These are expressed in our Annex 1 to this representation. We are also aware that through previous Local Plan examinations in other parts of the country Local Plans have been found to be unsound. Annex 2 to this representation refers to cases that in our view have similarities with this Local Plan Review and we ask the Inspector to bear these decisions in mind when considering the Stroud Local Plan Review.

We expand upon our concerns in the attached representation titled 'BaSRAG - PS36 Response Final and Annexes'.

Q7b. Please set out any modification(s) to PS36 Sharpness new settlement, you consider necessary to make the site legally compliant and sound.

We have outlined above our concerns regarding many aspects of infrastructure, transport, employment and environmental factors. These lead us to the view that this development is not sustainable. It is unlikely to be viable. It will not be deliverable within the timeframe proposed in the Local Plan. There has been virtually no community engagement through the process to date and there is very little if any community support for it. We therefore respectfully ask the Inspector(s) to reject this proposal and seek to install one of the other more sustainable options for meeting Stroud's housing needs to 2040 and beyond.

Q8a. Do you support or object to site allocation PS37 Wisloe new settlement?

I do not wish to make a comment. Please go to next question

Site allocations - Cam and Dursley Cluster

Q9. Would you like to make comments on one of the site allocations in the Cam & Dursley Cluster?

No. I would like to comment on another section of the plan. Select and press 'next page' at bottom of this page

Site allocations - Cotswold Cluster

Q15. Would you like to make comments on the site allocation in the Cotswold Cluster?

No. I would like to comment on another section of the plan. Select and press 'next page' at bottom of this page

Site allocations - Gloucester's rural fringe

Q18. Would you like to make comments on one of the site allocations in the Gloucester's rural fringe?

No. I would like to comment on another section of the plan. Select and press 'next page' at bottom of this page

Site allocations - The Severn Vale

Q26. Would you like to make comments on one of the site allocations in the Severn Vale?

No. I would like to comment on another section of the plan. Select and press 'next page' at bottom of this page

Site allocations - Stonehouse Cluster

Q31. Would you like to make comments on one of the site allocations in the Stonehouse Cluster?

No. I would like to comment on another section of the plan. Select and press 'next page' at bottom of this page

Site allocations - The Stroud Valleys

Q38. Would you like to make comments on one of the site allocations in the Stroud Valleys?

No. I would like to comment on another section of the plan. Select and press 'next page' at bottom of this page

Site allocations - The Wotton Cluster

Q49. Would you like to make comments on one of the site allocations in the Wotton Cluster?

No. I would like to comment on another section of the plan. Select and press 'next page' at bottom of this page

Promoting an additional or alternative site

Q53. Would you like promote an additional or alternative site?

No. I would like to comment on another section of the plan. Select and press 'next page' at bottom of this page

Section 1. Setting the Scene - Why do we need a plan?

Q54. Would you like to make comments on Section 1. Setting the Scene - Why do we need a plan?

Yes. Please select and move to Q55

Q55. Do you consider Section 1. Setting the Scene - Why do we need a plan? to be:

	Yes	No
Legally compliant (see definition on Council web page)		X
Sound (see definition on Council web page)		X
Complies with the Duty to co-operate (see definition on Council web page)		

Q56a. Do you support or object to the contents of Section 1.0 What is a Local Plan for?

Object

Please give details why you support or object to section 1.0, referencing any legal compliance, soundness or duty to co-operate matters. Please be as precise as possible, referencing specific wording, figures, paragraphs, policies or maps, as appropriate.

Paragraph 1.0.18 of the pre-submission Draft Local Plan states: 'The Sustainability Appraisal (SA) of the Stroud District Local Plan has been fully integrated into the plan preparation process, so that it has informed and influenced the plan as it has evolved. The SAs done at earlier stages of the process tested each possible alternative strategy against a number of sustainability objectives. We have used the results of these tests in deciding on our final strategy, as well as the policies and proposals that support it.'

The Sustainability Appraisal (https://www.stroud.gov.uk/media/1485646/sa-report-for-stroud-district-local-plan-review_-_pre-submission-may-2021.pdf) is inconsistent in its approach and outcomes, with the result that it fails to deliver an objective assessment.

Stroud District Council's reliance upon it therefore does not meet the test of soundness in relation to being 'justified'.

Further as the Sustainability Appraisal is a required part of the 'proposed submission documents' under Regulations 17, 19 and 20 of The Town and Country Planning (Local Planning) (England) Regulations 2012, its inadequacy must bring into question the legal compliance of the local plan and its development.

In particular the Sustainability Appraisal:

- Conflates Phases 1 and 2 of the site allocation PS36, rather than considering the potential sustainability of PS36 (Phase 1) as presented in the pre-submission Draft Local Plan;
- Is inconsistent in scoring in relation to PS36 - considering the potential sustainability at the conclusion of Phases 1 and 2 interchangeably, presenting the 'optimal' result to support positive scoring;
- Does not consider site allocations on a 'like for like' basis – none of the other strategic sites are considered for their sustainability beyond the plan period;
- Is inconsistent in the appraisal method: with some appraisals considering policy implications and others being policy agnostic;
- Does not appraise impact on education facilities, which will be significant considering the strategy adopted by Stroud District Council to deliver volume housing via large sites, requiring infrastructure and community investment;
- Does not adequately consider mitigation, in particular in relation to recommendations within the Habitat Regulations Assessment; and
- Is reliant on assessment methods which are questionable in their accuracy and consistency.

We expand upon our concerns in the attached representation titled 'BaSRAG - Sustainability Appraisal response - Final'

Q56b. Please set out any modification(s) to Section 1.0, you consider necessary to make the Plan legally compliant and sound.

Stroud District Council has asserted they have relied upon the Sustainability Appraisal to decide their final strategies, policies and procedures within the proposed Local Plan.

We believe the Sustainability Appraisal to be fundamentally flawed. Stroud District Council's reliance upon it has created a Plan which is inherently unsound and should be reconsidered.

We recommend Stroud District Council revisit the scoping, methodology and assumptions in relation to the sustainability appraisal; consider the accuracy of the evidence base and data on which it relies; and undertake a new sustainability appraisal to recommend appropriate strategic site(s).

Q57a. Do you support or object to the contents of Section 1.1 Putting it into perspective: Our District's issues, challenges and needs?

I do not wish to make a comment. Please go to next question

Section 2. Making Places - the development strategy

Q58. Would you like to make comments on Section 2. Making Places - the development strategy?

No. I have no further comments to make and would now like to submit my response. Select and press 'next page' at bottom of this page

Section 3. Making Places - Shaping the future of Stroud District

Q74. Would you like to make comments on Section 3. Making Places - Shaping the future of Stroud District?

No. I would like to comment on another section of the plan. Select and press 'next page' at bottom of this page

Section 4. Homes and communities policies

Q85. Would you like to make comments on Section 4. Homes and Communities policies?

No. I would like to comment on another section of the plan. Select and press 'next page' at bottom of this page

Section 5. Economy and infrastructure policies

Q107. Would you like to make comments on Section 5. Economy and infrastructure policies?

No. I would like to comment on another section of the plan. Select and press 'next page' at bottom of this page

Section 6. Our environment and surroundings policies

Q129. Would you like to make comments on Section 6. Our environment and surroundings policies?

No. I would like to comment on another section of the plan. Select and press 'next page' at bottom of this page

Section 7. Delivery and monitoring

Q149. Would you like to make comments on Section 7. Delivery and monitoring?

No. I would like to comment on another section of the plan. Select and press 'next page' at bottom of this page

Section 8. Appendices

Q152. Would you like to make comments on Section 8. Appendices?

No. I would like to comment on another section of the plan. Select and press 'next page' at bottom of this page

Policies Map

Q159. Would you like to make comments on the Policies Map (including changes)?

No. I have no further comments to make and would now like to submit my response. Select and press 'next page' at bottom of this page

Uploading supporting documents

Please upload any relevant supporting documents (maximum 6). Please ensure each document is no larger than 10mb. The supporting documents should be redacted of all personal information before they are uploaded and they will be published on the Council's web page as part of the representations for publication. If you need to submit more than 60mb, please get in touch and we will facilitate a file transfer. If you do not wish to upload any documents, press 'next page'

- File: BaSRAG - Sustainability Appraisal response - Final.pdf
- File: BaSRAG - PS36 Response Final and Annexes.pdf

Notifications

Q162. Would you like to be notified about any of the following next steps?:

	Yes	No
Submission of the Local Plan for public examination by an independent Inspector	X	
Publication of the Inspector's recommendations	X	
The adoption of the Stroud District Local Plan.	X	

Participating in an examination hearing session

Q163a. If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)? Please note that this provides an initial indication of your wish to participate in the hearing session(s). 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 again to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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

If you wish to participate in the hearing session(s), please set out the particular objections and outline why you consider this to be necessary:

The Berkeley and Sharpness Residents Action Group (BaSRAG) is an action group representing the concerns of local people about development proposed in the Stroud District Local Plan Review between Berkeley and Sharpness in the Berkeley Cluster. We are particularly concerned about the Council's proposals for a 'growth point' between Sharpness and Berkeley - allocation PS36 - in a so-called "garden village" of initially 2,400 houses but leading to 5,000 houses by 2050. The group was formed following locally organised residents' meetings held in both Sharpness (Dec 2018) and Berkeley (Jan 2019). A website has been set up by local residents to help keep the local community informed of local planning and developments - <https://basrag.com>

As outlined in our details responses in relation to PS36 and the Sustainability Appraisal (and the reliance upon it in paragraph 1.0.18) we believe the Local Plan to be unsound.

We would welcome the opportunity to participate in the hearing sessions to represent the views of our community.

Q163b. If you selected that you wish to participate in the hearing sessions please indicate which particular sections of the Plan you would like to raise objections to at the hearing(s).

Site allocations

1.0 What is a Local Plan for?