

Additional Technical Consultation – Limited Consultation – response from BaSRAG (Berkeley and Sharpness Action Group)

We welcome the opportunity to comment on the updated technical documents relating to transport, infrastructure and viability and new background evidence on the accessibility of sites to services and facilities. We would point out that BaSRAG objects to the scale of development proposed in the allocation PS36 (Sharpness) in the Pre-Submission Local Plan, and that we have commented before at each stage of the preparation of the Local Plan.

We note that on recent viewing of the Examination Library hosted on the SDC website that there are a number of other “additional” documents that have been placed there since the submission of the Local Plan for Inspection. It would appear that these appear to now form part of the ‘evidence base’ for the LP but they have not been made available for public consultation. Is there a reasonable explanation for this?

BaSRAG has previously commented on the poor accessibility of PS36, its lack of infrastructure, the timing and cost of new infrastructure and the unrealistic proposals for opening the Sharpness Branch line, a new railway station and new bus services. We have considered the new documents **EB108** The Sustainable Transport Strategy Addendum and **EB109** Transport Funding and Delivery Plan. We find that there is very little new evidence about the transport solutions to address our concerns about the accessibility of PS36. Indeed it appears that the developer’s/Council’s solutions appear to diminish spending on road/rail infrastructure and focus it on “public transport” solutions. There remains no evidence to support the feasibility of the rail proposals necessary and the transport concerns expressed by other experts (Network Rail, Gloucestershire County Council, Stagecoach) remain unanswered. We therefore maintain our objections to PS36 on these grounds.

The **EB110** Infrastructure Delivery Plan (IDP) Addendum is a highly technical document that we, as a voluntary organisation without the detailed expertise, find it difficult to comprehend and comment upon, especially in the short time afforded to us. However, suffice to say that we find nothing in it that reassures us that the proposed infrastructure is viable, deliverable or adequate to address a development of the scale proposed at PS36.

With regard to the **EB112** series of documents on SALA Transport Accessibility we find that our views over the lack of consistency in the appraisal method within the Sustainability Appraisal and the deficiencies in assessment data are only reinforced by the publication of this data.

Specifically we note that in regard to PS36 there has been an alleged ‘improvement’ in its accessibility score that can only be explained by the use of a “policy-on” approach as nothing has significantly changed in the area to account for the ‘improved’ accessibility scoring. Indeed, the accessibility has worsened if anything by the withdrawal of some bus services to the area since the LP was submitted for Inspection. We believe a similar policy-on approach has not been applied to other SALA sites and is therefore an inconsistent appraisal method that treats PS36 unfairly. The table below indicates the apparent improvement in the accessibility of PS36 (with lower scores supposedly indicating better accessibility and therefore a lesser environmental impact):

LP allocation	SALA ref	SALA 2018 score	SALA 2019 score	SALA 2020 score	Difference
PS34	NEW001	98		97	-1
PS35	NEW006	74		70	-4
PS36	NEW002	85		67	-18
PS36	NEW002a	-	93	82	-11
PS36	NEW003a	77		70	-7
PS36	NEW003b	85		68	-17
PS36	NEW005	74		74	
SA5a (2015 LP)	NEW004	89		69	-20
-	NEW007		90	69	-21

Furthermore, we dispute the validity of some of the “destinations” used to assess accessibility:

- Key Employment Site: Whilst the Rigestate Industrial Estate and the Severn Distribution Park have that planning policy status, they are both relatively small employing less than 500 people between them. They do not provide adequate employment opportunities for the existing population, let alone the occupants of another 2,400 (or possibly 5,000) homes.
- Library: The Berkeley Library - whilst much valued in the area - is a community run, part-time venture inadequate to serve the needs of the proposed 2,400 homes.
- Secondary School: The nearest traditional secondary schools are either over 6 miles away at Rednock in Dursley or over 9 miles to Katherine Lady Berkeley in Wotton-Under-Edge and are not served by conventional public transport. They require special school buses to serve the area. The SGS Berkeley Green UTC is a 14-19 school with a curriculum specialising in Engineering, Design and Digital/Cyber and is not a traditional secondary school. Again it relies on school buses to transport most of its students.
- Bank: The Coventry Building Society in Berkeley is an agency. There is no traditional banking service available in Berkeley other than a Nat West mobile bank that visits Berkeley once a week for a 2 hour period.
- Leisure Centre: The nearest leisure centres are in Dursley and Thornbury and not at Berkeley Primary School as suggested. This school has a small volunteer run open air swimming pool that opens for limited periods in summer months and cannot by any stretch of the imagination be classed as a leisure centre.
- Supermarket: The only supermarket in Berkeley is a Co-op of approx 2,500 sq ft. Whilst having the “major brand” title it does not have the range or scale of goods to adequately serve the needs of the local population. Most people travel to sores in Dursley, Thornbury and other bigger towns for their convenience shopping.

If actual destinations were factored in for the accessibility scoring rather than these theoretical 'destinations' we believe the area would score significantly worse in the SALA Assessments - reflecting the true lack of accessibility of the PS36 proposal. This would appear to be yet another example where the evidence has been adapted to support the Plan rather than it being driven by the evidence.

In the light of the above, we maintain our objections to the Sustainability Appraisal as previously set out in our comments on the pre-Submission Local Plan.

We would also like to associate ourselves with the comments made by Hamfallow Parish Council about reports EB108, EB109 and EB110.

25 October 2022