



18 January 2019

Local Plan Review
The Planning Strategy Team
Stroud District Council
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Dear Stroud District Council,

Comments in response to the
Stroud District Local Plan Review Emerging Strategy Paper
with regard to
The Berkeley Cluster

On first seeing the plan, I did not immediately form an opinion. My initial thought was that a cycle path over the Severn would be fun and convenient for walks in the forest. However, the more I looked into the plans, considered it in depth and visualised how the various scenarios could play out, the more reasons I found to object to the plan. The reasons are diverse as well as many. I have also struggled to find anything much in the way of benefits for the local community or the wider communities of Stroud and Gloucestershire (and South Gloucestershire and beyond).

The plan for major development in the Berkeley and Sharpness area is unsuitable and vastly disproportionate for each of the reasons listed below. Large scale development beyond that needed to sustain the area will be hugely detrimental in many ways to the area and its residents (and those in the wider local area). Moreover, it will very badly serve the needs of the incoming population who will have to be drawn from outside the local area in large numbers.

The only winners will be the developers and the selling land owners. There will be lots of losers.

Quotes from the Stroud District Local Plan Paper

- i) 2.1 The lack of jobs within Stroud District is a great concern for local people, meaning that many people living within the area need to commute to larger city areas for employment.
- ii) 2.1 Most respondents stressed the importance of controlling development in rural areas in order to prevent adverse impact on the countryside and to ensure that sufficient farmland is retained for future food production.

Geography and Transport

- a) The geography of the Berkeley Cluster / Sharpness area is such that it is a rural area midway along a narrow vale sandwiched by two physical barriers: the Severn to the west and the Cotswold edge to the east. For the vast majority of purposes, there are only two directions of

travel out: north towards Gloucester and south towards Bristol. The roads up the edge to the east are steep country lanes and there is no major town or destination accessed in that direction (other than the completely out-of-the-way council tip). There is nowhere at all accessed to the west due to the location on the Severn. The wetlands at Slimbridge act as an additional barrier forcing even further reliance on the A38. The Berkeley and Sharpness area is not a sensible place to build a substantial new settlement in the modern world.

- b) The Berkeley/Sharpness area is not only some miles away from the motorway junctions and Cam train station, it is a few miles away from the A38. The roads to the A38 are already inadequate for the Sharpness lorry traffic and are dangerous for cyclists and completely inadvisable for pedestrians. The roads to the A38 will need to be upgraded for safety alone. Alkington Lane is not fit for purpose being narrow, prone to road edge collapse, and having a blind bend: It can be unnerving when facing one of the frequent lorries coming the other way. The other route out involves the junction at Berkeley Heath which has been recognised as inadequate for decades. The original plan to extend the Berkeley bypass to the A38 has never happened.
- c) The additional traffic on the A38 will be an unacceptable burden to those using the road and to those living beside it. Many older houses front closely onto the A38. The A38 in either direction (to the Stroud or Falfield junctions) is no longer a fast route and is now a local artery passing through numerous 30, 40 and 50 mph zones and housing areas. Those areas include Stone primary school and the dangerous bend at Cambridge amongst others. In recent years, new houses have been built adding to a fair number fronting directly and closely onto the A38.
- d) The A38 will need substantial upgrades to cope with the traffic and for safety reasons. For example, it is already very tricky to turn right onto the A38 when coming from Frampton-on-Severn.
- e) The Falfield M5 junction consists of two crossroads rather than a roundabout. South Gloucestershire has already had major problems with traffic management via traffic lights at this junction. There are plans for huge numbers of new houses by the A38 near Thornbury. In addition, to the additional traffic from the Berkeley Cluster heading south and the additional Thornbury traffic heading north, much of the new Thornbury traffic heading south will also use the Falfield junction at peak times: the A38 towards Bristol is already a choked bottle neck with long queues at Almondsbury.
- f) When the A38 is closed for repairs or accidents, there are no clear, easy or suitable diversion routes. This is true of both north and south directions. The A38 is an essential artery for the area due to the geography. The evidence of this is the diversion that was created when the bridge over the railway line near the Prince of Wales was closed for repairs. The area of Berkeley and Sharpness can easily be cut off. This also happened during the floods a few years ago when the area became an island as far as cars were concerned, with the roads impassable in a number of places. Due to the barrier effect of Slimbridge and the wetlands, there is no road route north without using the A38.
- g) When the M5 is closed, the A38 is the only alternative route. If the A38 were to have even one lane closed at the same time, there would be a major problem.
- h) The shortest and quickest route from Berkeley to the Falfield junction is already via Berkeley's historic High Street and the back roads to Stone. As the A38 gets busier and slower, more traffic will take the shortcut down the highly unsuitable High Street.
- i) The train station at Cam is several miles away and has only slow trains stopping. The car park is already oversubscribed with more houses planned for Cam and Dursley. The route to Cam

station is unpleasant, dangerous and dark for even those cyclists otherwise willing to do the mileage. (The Berkeley and Sharpness area are also particularly windy and this can be a real challenge to daily cycling.) Recently published statistics show that the number of cycling journeys is not growing, with safety being cited as one hindrance.

- j) The major employment hubs and towns are way too far to be commutable by bicycle for the vast majority. The main urban centres of Bristol and Gloucester/Cheltenham are too far and costly for commutes to lower paid jobs. Even Stroud is 14 miles.
- k) The Berkeley area is on the edge of Stroud district and the edge of Gloucestershire. Stroud Districts Council's plan treats the district as an island and the positioning of such major development does not take in to account the large number of new houses planned for the Thornbury and wider South Glos areas.

Public Services and Facilities

- l) In the 2017 plan, Stroud District Council rated the level of access to services in the Berkeley area as poor. In the 2018 plan, there is a slight change of wording and that is rating is increased to good. However, there have been no additional services and a pub in Berkeley has closed. There is no explanation or justification regarding this improved rating. I request to see a breakdown of the way this rating has been calculated for 2018, 2017, and for previous years.
- m) There are very limited public services within the area. For example, there is no state secondary school, no community hospital, no bus station or taxi rank (there are barely any buses), no job centre or benefits office. The nearest tip and adequate recycling facility is at Horsey, many miles and an inconvenient drive away. The residents are strictly forbidden from using South Gloucestershire's services (enforced by number plate cameras and fines). There is already a shortage of parking for the existing shops and the primary school and GP surgery have no space to expand. There is already a new housing estate currently being built and this will add to the demand on the existing resources.
- n) There is very limited public transport at present.
- o) The area is a long way from any A&E (c20 miles). There is no ambulance station, no fire station and no police station.
- p) The developments are unlikely to help the Berkeley shops much due to walking distances and lack of parking. New shops will threaten the survival and vibrancy of the town centre. There should be caution about how many shops and retail jobs will be created. Shops are closing down and shopping is becoming more centralised. For example, online deliveries to this area by Tesco come from Bristol despite there being much closer stores in Cam and Thornbury. So the number of jobs and the level of consumer spending in the area will not be as high as could once have been assumed.
- q) Whilst there is a need for much more social housing, those in social housing are less likely to own a car or be able to afford to commute long distances, and are more likely to need easy access to main services such as hospitals, schools etc as well as needing to be near their existing support circle for general assistance, child care etc. Even if more buses are run, the journeys will be too long and expensive and will not be possible outside of bus hours which even in towns are usually restrictive. People generally wish to live close to everything they need, and for most people that means living in urban areas. Building more social housing than is required to meet

the existing demand of the area will leave people isolated and struggling to cope. The policy is socially irresponsible and lacks consideration as to how people will cope.

- r) What is going to come first: the houses or the infrastructure and public services? To avoid creating a huge social, economic and environmental mess, the infrastructure and public services have to come first but will that happen? Given the fact that even basic services and infrastructure have been run down in recent years and the councils can't even provide a pedestrian and or cycle way from Berkeley to the A38, it is impossible to visualise the level of investment required being put in at any point in time, let alone upfront.

Employment Opportunities, Housing Demand and Social Issues

- s) There is no evidence that sufficient employers will be attracted to the Berkeley area or that businesses and industries are wishing to relocate or expand into the area. The evidence is to the contrary. As large numbers already commute out of the district, why does Stroud District Council not address that lack of employment in the district before deciding it can attract employers to a new town in what it calls a 'rural hinterland'. How about first bringing sufficient jobs into the area for the new houses already being built in Berkeley, Cam and Dursley if doing this is anticipated to be so straight forward? It is not going to be the developers or housing associations problem to create jobs for their buyers and tenants. Given the out-of-the-way location and the distance from established employment zones and major population pools, the area will struggle to create many jobs, and will especially struggle to create specialist or skilled jobs.
- t) Employers setting up new sites look for areas where there is already a base of potential employees with the skills required, even if they will be competing against other employers for their staff. Likewise, employees tend to stay within the geographical area in which they are already established: if they do move, they tend to be willing to only move to an area where they will have alternative future employer options. Hence the clusters of IT companies that choose to set up in the Slough/Reading area, or aerospace in Bristol, or financial services in Edinburgh, even though salaries and offices would be a lot lower in other regions. This catch-22 situation is difficult to overcome and it isn't one Stroud District should choose to ignore or think it can buck.
- u) Employees are increasingly unlikely to move home for a job change: the financial cost and logistical hassle is too high (even if renting and childless) and job security is too uncertain. Employees are much more likely to travel further if need be than to move home. In my professional life, I have spoken in detail with thousands of job seekers and have a good understanding of the general mindset which is pretty ubiquitous. Also, employers generally prefer local candidates and that can put people in an area without enough jobs at a disadvantage even when able and willing to commute or even relocate. (The truth is that recruiters generally try to avoid candidates who would have to relocate.) It should also be remembered that due to caring commitments and children, many people do not have the time or flexibility to commute, and these days both in a couple go out work. Those who work at home are usually aware of the danger of becoming cut off from the outside world that they know.
- v) Even if sufficient new jobs are attracted to the area, Stroud District Council should not assume that there will be a large overlap between those taking up employment in the area and those living directly within the area. The reality is that there is likely to be little overlap. If the houses come first then the jobs, the residents will already have jobs elsewhere (unless they are unemployed). So there will be a large number of people commuting out of the area each day and many people commuting the other way into the area. This will be especially true if the jobs

are specialist or skilled. If the jobs are low wage, the housing will need to be pretty cheap indeed in order to attract people into the area.

- w) If there is to be significant social housing beyond the current needs of the area, then the picture is of many people who have no choice being shipped by the authorities out to an area which Stroud District's plan describes as a "Rural Hinterland". Being realistic, the lower wage jobs will not come first and the public services will not be built first. Old people will be far from their children and young parents will be far from their family support system. There is a huge social problem in the making which will not be the responsibility of the developers to try and fix.
- x) Will employers be paid grants to set up in the area, as had to happen in the past in areas such as South Wales and Sunderland? What happens if one or two large employers move in then subsequently close the site? There is a real risk of creating a poor, isolated town which struggle to attract other employers. Look at the problems of certain towns in South Wales and elsewhere.
- y) Although house prices are too high and are unaffordable for many, the prices in the Berkeley area are lower than in South Gloucestershire, and are even lower in the Sharpness and Newtown area. Prices are at the current level not because of a housing shortage in the area but because of higher prices in surrounding areas, including Thornbury, Stroud and Cheltenham. The Berkeley area is very rare in that it currently offers a much more affordable opportunity to live in a small country town or a quiet rural area than anywhere else I can think of this side of the Severn. For instance, it is significantly cheaper than places like Uley and North Nibley let alone further into the Cotswolds. The few new houses recently built in places like Nympsfield are incredibly expensive. Who can be buying those, I have wondered. Retirees from the South East? Why were no smaller, cheaper houses built there? The majority of small houses in the countryside have already been extended into more expensive, bigger houses. Destroying the rural nature of the Berkeley and Sharpness area will be acting to reserve a rural way of life for only the wealthy and already property rich. It does not serve the people of this area at all. It destroys why they chose to be here. Stroud District Council is supposed to serve the best interests of the people in the district, not sabotage their way of life.
- z) There are huge housing developments already approved for the Thornbury area. With even more in the pipeline, those developments will have huge downward impact on the demand for houses in the Berkeley area. When we moved here, like many others we did so only because it was substantially cheaper than areas in South Gloucestershire which are closer to Bristol or Bath, particularly Thornbury.
- aa) In addition to the thousands of new homes in Thornbury, the removal of tolls on the Severn bridges has opened up the Chepstow area to those employed in the Bristol area. The outward ripple effect on house prices is already in evidence since South Wales is cheaper than Bristol. If the tolls had not been in place when we moved here, we would certainly have looked at the Chepstow area.
- bb) Given the massive new availability of houses elsewhere due to new houses in Thornbury and the opening up of South Wales to Bristol commuters, there will be subdued demand for the houses in Berkeley. One scenario is that the housing development is left incomplete due to the low returns for the developers: remember the abandoned, messy building sites in Bradley Stoke in the 90s. The promised infrastructure and services will not arrive, with excuses made that they can no longer be justified.

Reality Check on New Infrastructure

- cc) There needs to be a reality check on whether projects like a new motorway junction and a new bridge are truly realistic or likely to happen. Where will the money come from? Now that the existing Severn bridges are toll free, it is inconceivable that a new bridge could be funded by tolls. Lydney is a small town and has a similar geography to Berkeley. The hills to its west are steep, and the only main places to go onto are to Chepstow or Gloucester; exactly the two places that can already be reached just as easily by free routes.
- dd) Currently there is no bottleneck of traffic trying to get from Berkeley to Lydney or vice versa. In fact, the traffic level is absolutely zero. The rail bridge was not replaced even when there were strong community links between the two sides: those links have long gone. There is no problem here to be solved by building a bridge. Given the struggles to fund and plan major roads required to solve problems, believing there will be funds to build a bridge from Sharpness to Lydney is fantasy land. It seems that the idea is to create enough problems for the area that forever bigger solutions are needed until the area is totally urbanised.
- ee) Noise levels from a bridge would completely change the nature of the areas on both sides of the Severn. Anyone who has ever walked along the Severn Way on either side within a fairly large vicinity of the Severn Crossings will know how incredibly noisy they are and how far the noise will travel as there is no land or trees to absorb or block the sound. A bridge would not serve the area and the people are not asking for one.
- ff) A new motorway junction would create more noise, more pollution and more traffic as well as cut up some of the local environment. The motorway is already intrusively noisy when up on the Cotswold edge. As it stands at present, the junction would save some driving time at first for non-local journeys but as that will soon encourage longer journeys and more journeys, the saved time will be wiped out, maybe get worse, and the extra pollution and noise will have reduced the quality of the area. Where is the wish for this junction coming from? It will just be used as an excuse to further urbanise the area.

Natural Environment, Flora and Fauna, Pollution and Climate Change (CO2 Emissions)

- gg) The plan completely overlooks the value of the natural environment of the land to the west and north west of Berkeley (PS36). There is a network of ancient green lanes and public footpaths which are bordered on both sides by hedges and in the summer these ancient and undisturbed green lanes are thick with wildflowers and wildlife. There is a huge range of plants and a great many insects and animal tracks across the now narrow paths into the nearby copses. The Berkeley area may not be within the area of outstanding natural beauty but that is beauty defined by a particular and narrow way of looking at and valuing the landscape. The woods on the Cotswold edge are brilliant in many ways but the value to nature and the attractiveness of the large, bare, monoculture fields which dominate much of the Cotswold landscape is not only questionable but we already know the answer. The value is very low and we now know that conservation and biodiversity is not really about pretty rolling hills and big fluffy mammals but is more and more about the detail and the small and the tiny: pollinating birds and insects and the life that humans cannot even see: fungi, microbes, soil quality.
- hh) The soil type and habitats of this area are entirely different to that of the Cotswolds and most of elsewhere in Gloucestershire. This results in different species. The area is also very damp and typical of habitats that are most under threat and disappearing fast due to drainage and development. These old green lanes provide habitats desperately needed by British wildlife, much of which is disappearing at a very alarming rate. The green lanes are also part of the

history of the area. In the future, it will be seen as criminal that these habitats have all been destroyed. They will be gone forever.

- ii) The soil type in the Sharpness docks area is different again and there are many unusual wild flowers growing there which I have not seen elsewhere. The Sharpness area is a unique place which is underestimated and should be preserved. There are some areas that I know of within the Sharpness development area which have established Japanese Knotweed growing. A large area of strong growth has recently appeared after soil was recently dug and spread from another area which had not appeared affected.

- jj) Water Dropwort Hemlock grows in large tracts along some of these green lanes to the NW of Berkeley. Not only is this an indication of the regular bogginess of some of the terrain, whilst Water Dropwort Hemlock is great for many insects, it is very bad news for humans, dogs, horses etc. It is the most poisonous plant in the British Isles and all parts of the plant are incredibly poisonous, deadly in small amounts, and quickly fatal. It smells and tastes nice and it can be mistaken for parsley or celery and its roots for turnips (dogs can dig them up). It seeds prolifically and will spread beyond its natural damp habitat into cultivated gardens. Disturbing its roots or transferring the soil will cause further spread. It will not be possible to remove it without either deep soil removal of the green lanes and hedgerow areas or cutting down all of the plants for many years until it has gone. Either way, the lanes and all the wildlife will be no more. Seeds can survive in the ground for 50 years so digging the drained fields may well cause eruptions of this plant. Furthermore, Water Dropwort Hemlock remains just as poisonous once the plant is dead, cut and dried, and so specialist disposal is essential. I am not exaggerating: in some parts of the lanes, Water Dropwort Hemlock is the dominant plant in high summer. You really don't want it growing in gardens or public areas.

- kk) Given the pressures on the environment, health and climate change caused by car emissions (Co2 and pollution), and the loss of bio diversity and wildlife habitats, it would be irresponsible and reckless to go ahead with developing a new settlement in such a rural area.

Stroud District Council's Legal Fight against the Current Development opposite Berkeley Castle

- ll) Stroud District Council appealed against the government decision to override the council's local plan. The council argued to the council tax payers that the legal cost was justified because the council had already spent much greater resources creating what it considered to be the best plan for the district. The Berkeley development had not been included because the location was considered unsuitable by the council due various issues including many of those addressed above. The current development is tiny in comparison to the planned one. As the council considered that development unsuitable, then it is incomprehensible how the council can be seriously considering this plan.

The End (phew)