CONSULTATION RESPONSE TO STROUD DISTRICT COUNCIL'S ADDITIONAL HOUSING OPTIONS CONSULTATION, FROM HAMFALLOW PARISH COUNCIL, DECEMBER 2020

- 1. Thank you for the opportunity to comment on the additional housing options proposals, as part of the review of the Stroud District Local Plan. We have discussed this with our district councillors and within our own Council. Given the short timescale, we have not been able to consult parishioners directly, but this response is broadly in line with our last Parish Plan.
- 2. We recognize that the options in this consultation have only a limited direct effect on our Parish; the proposed housing sites at Hook Street Farm (BER016) and Bevans Hill Farm (BER017), which are within Hamfallow, would add just 60 dwellings to the much larger numbers already proposed for the Berkeley Cluster in the draft Local Plan. We can say straight away that we have no specific objection to those two proposed sites. This is in line with the comment we made in the final paragraph of our response to your "Emerging Strategy" in January 2019 that: Hamfallow PC would not necessarily object to more proportional and realistic developments in this area.
- 3. However, you will know from the comments we made in January this year on the draft Local Plan, that that we have strong objections to the major new settlement proposed for the "Berkeley Cluster" (PS36 Phase 1 and 2). We appreciate that this consultation is not about that proposal, so we will not repeat our objections here, but our response to the Additional Housing Options needs to be seen in that context.
- 4. We firmly believe that the proposals for major new housing development in the Severn Vale at Grove End Farm, Whitminster (WH1014 2250 dwellings) and at Moreton Valence/Hardwicke (HAR006-009 and HAR015-016 1500 dwellings) are a far more sustainable solution for meeting Stroud District's future housing target than is the Berkeley Cluster proposal. We outline our justification for this view in the points below.
- 5. The Severn Vale proposal is a much better location for access to existing transport links. Much of the housing would be located between the existing two major transport arteries, the M5 and A38, with easy access to the motorway via junction 13 which, unlike junction 14 near Berkeley, is not already operating beyond its capacity. There is also easy access for rail travel to London, via Gloucester or Stonehouse stations. For rail access to the south and south west (Bristol, Bath, Exeter etc) there are firm proposals for reinstating the station at Stonehouse on the Bristol to Gloucester line, which are far more likely to be funded than the unrealistic proposals for building a new station at Sharpness, which anyway would have no direct access to the south.
- 6. The Severn Vale proposal is also a much better location for a major new centre of population that will live and work in Gloucestershire, rather than out of county, thereby minimising travel and boosting local industry. This contrasts with the development proposals further south near Berkeley, which would inevitably attract a large proportion of those who wish to commute to Bristol, using the already overloaded roads and junctions and not contributing to Gloucestershire industries.

CONSULTATION RESPONSE TO STROUD DISTRICT COUNCIL'S ADDITIONAL HOUSING OPTIONS CONSULTATION, FROM HAMFALLOW PARISH COUNCIL, DECEMBER 2020

- 7. Next, considering the environment, development in the Severn Vale south of Gloucester is far less damaging than development in the Berkeley Vale would be. The Berkeley Vale between the A38 and the River Severn is a very quiet and largely unspoilt rural area, whereas the area around Whitminster and Moreton Valence is already well developed, with the M5, A38, the waste incinerator and some significant industry like Smiths Waste, and Downton. Noise and pollution levels are already relatively high, and the housing development is unlikely to make a significant additional contribution. Biodiversity will already have been limited by decades of development in this area, from when Moreton Valence airfield and the M5 were built and, again, further housing development will give little additional detriment.
- 8. Finally, there is the issue of safety and, again, we need to make comparisons with the situation for the proposed Berkeley Cluster. The Severn Vale proposed development at Whitminster and Moreton Valence would not be at risk from any major industrial hazards that we are aware of. The Berkeley Cluster, however, would be at risk from the storage of explosive ammonium nitrate (AN) at Sharpness Docks and the intermediate level radioactive waste stored at the Berkeley Nuclear Site. We accept that these risks are currently assessed to be low, but that may not be how it is perceived by potential house buyers. We are also aware that the Health and Safety Executive are currently reassessing the risks from AN storage after the Beirut explosion. Turning to flood risk, this must be relatively high and increasing at Berkeley where the development is on the very edge of the flood plain. In contrast, the Severn Vale area is well above sea level and flood risk should be negligible for the foreseeable future.
- 9. In summary, we believe that this Additional Housing Consultation is misleading in trying to consider new proposals for development in the Severn Vale at Whitminster and Moreton Valence in isolation from the earlier proposals in the draft Local Plan. As set out above, we believe that it must be compared with the other proposals and it is our firm view that Severn Vale is very suitable for major housing developments and should be seen as a replacement for earlier proposals for the Berkeley Cluster. That said, our Council remains, as ever, willing to consider sensible, realistic and proportionate housing development in our area as a contribution to Stroud DC targets.
- 10. We request that a copy of this and our earlier responses are provided to the Planning Inspector when one is appointed to review the Plan.

Hamfallow Parish Council

December 2020