

## **BaSRAG Response to the 'Additional Housing' consultation as part of SDC's review of the Local Plan**

You will be aware from our consultation response to the Draft Local Plan that we believe that it makes no sense to build the vast majority of the new housing in the south of the District, when there is envisaged significant growth between Gloucester and Cheltenham for economic and industrial development (ref: Vision for Gloucestershire 2050).

At that time we added that while we understood that the Council has a Duty to Co-operate, and that a significant area of land at Whaddon is preserved for Gloucester's use, it would appear to make more sense to build at areas such as Whaddon and Hardwicke, close to existing employment zones and infrastructure, to help Stroud's need. Then, from a County perspective, concentrate Gloucester's growth to the north of the city.

Building upon those views and in response to the 'Additional Housing' consultation we support the strategies A and C as presented - namely to intensify housing at the locations shown - i.e Hardwicke, Stonehouse and Cam - and to provide new growth points at the two locations named - PGP1 in the Severn Vale and PGP2 on Gloucester's urban fringe. In line with our previous comments we believe these locations to be more sustainable than the location identified in the Draft Local Plan (DLP) at Sharpness. A hybrid approach combining Option A and Option C is entirely consistent with our argument that any development should be sustainable in terms of employment, transport links and other infrastructure. Increasing densities at sites adjacent to existing urban areas and the new potential growth points further up the A38 and more accessible to the county's economic growth centre at Gloucester and Cheltenham tick those boxes far more than 5,000 houses built on the banks of the Severn, remote from any significant employment opportunities or major transport links.

However, we do not see the new locations in the Severn Vale and intensification of existing allocations as simply the answer to the potential need for additional housing. The new locations in particular should be seen as more sustainable alternative sites to the Sharpness allocation identified in the DLP. There is uncertainty as to whether additional housing will be required following the outcry - not least by many Conservative MP's including Siobhan Baillie for Stroud - against the unfair, poorly evidenced and undemocratic proposals contained in the Planning for the Future White Paper. There is the opportunity to revisit the whole Local Plan strategy taking into account the latest evidence and the whole range of sites now 'available'.

Your own Sustainability Appraisal shows the new settlement options at Whitminster and Hardwicke/Moreton Valence in the Severn Vale to be at least equally sustainable as those at Sharpness and Wisloe. The table at Appendix 1 compares the sites with a simple substitution of scores for the symbols used in your version. As can be seen, when those scores are totalled all the sites are closely comparable. However, as noted in the SA, much of the comment leading to those conclusions is subjective and we do not necessarily agree with those conclusions. Many of the assertions regarding Sharpness for example, seem to assume that infrastructure, new services and facilities and adequate employment will all come forward in a timely manner to match the housing provision. That is not the experience we see in the delivery of large housing sites, where often the provision of infrastructure for transport, education, health etc lags considerably behind housing provision, if delivered at all, leading to poor sustainability of developments. Given the isolated location of Sharpness, (as noted often in the SA), relative to the newly proposed settlements in the Severn Vale, its sustainability is relatively poor.

The Severn Vale proposals are far better located for access to existing employment opportunities, primary retail, health and education facilities via existing transport links. These sites are well located in close proximity to two major transport arteries, the M5 and A38, and have easy access to the motorway via junctions 12 and 13. Nearby rail stations in Gloucester and Stonehouse also provide for easy access by rail travel to all parts of the country. There are connections west into Wales, north to Birmingham, east to London and south to Bristol. Rail access to the South and South West (Bristol, Bath, Exeter etc) would also be improved by the proposals for reinstating the station at Stonehouse on the Bristol to Gloucester line and the potential exists for a rail halt/station nearer at Hunts Grove where land for a station is reserved. In our view these proposals are in a better position to receive funding than the unrealistic proposals for reopening the Sharpness branch line and building a new station at Sharpness which would only have direct connections to the North, the branch line to the South having been closed and removed in the 1960s. As we understand things, the developers application to the Restoring Your Railway Fund for feasibility study funding has failed on two occasions indicating a lack of government support for this scheme.

By the way, we find it entirely disingenuous that you have included the proposed rail link from Sharpness on your diagrams of the main options, when there is little or no realistic possibility of it coming to fruition in the short to medium term, if at all. No other proposed transport links are indicated, so why is this one? Its inclusion is misleading.

The Gloucestershire Vision 2050 envisages the major focus for economic growth in the County to lie between Gloucester and Cheltenham. The Severn Vale proposals are in a much better location to serve and benefit from that growth, whereas the Sharpness/Wisloe proposals are more likely to depend on employment opportunities out of the county

towards Bristol. The Severn Vale proposals can help to minimise travel and support local industry both nearby at Stonehouse and Gloucester and at the growth hub between Gloucester and Cheltenham. This contrasts with the development proposals at Sharpness and Wisloe, which would serve to house a population that looks to the South for work, a large proportion of whom are likely to commute to Bristol along existing congested roads and junctions making little contribution to the economic growth of Gloucestershire.

With regard to potential environmental damage we believe that the proposed Sharpness Garden Village (SGV) would be far more damaging than the proposals for development in the Severn Vale at Whitminster and Hardwicke/Moreton Valence. The SGV sits in the Berkeley Vale between the A38 and the River Severn in the estuarine grazing marshes and sandstone ridge landscape characters. This a peaceful, remote and largely unspoilt landscape that is sensitive to change and is visible across a wide area from within Stroud District and from across the Severn estuary in the Forest of Dean. In contrast the area around Whitminster and Moreton Valence lies within the extensive rolling agricultural plain landscape character area. This landscape has been partially degraded by relatively recent developments, with the M5, A38, the waste incinerator and significant industry such as Quedgeley West Trading Estate, Smiths Waste, and Downtons making prominent incursions into the landscape. The Sharpness proposals are in close proximity to protected wildlife assets of the Severn Estuary (RAMSAR, PSAC, SSSI) that will be adversely affected by the scale of development proposed. However, the Severn Vale proposals are not in close proximity to such major environmental assets and the biodiversity has been degraded by the various developments in this area referred to above. In our view further housing development in this area will have far less environmental impact than that proposed at Sharpness.

Finally, we support the views of the Hamfallow Parish Council in that 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.

Given the above it follows that we do not support the identification of a reserve site or sites. We believe a review of the overall strategy and re-assessment of the differing site

options should be undertaken immediately. Circumstances have changed significantly since the Council set out on the Local Plan Review, particularly in the context of the housing requirement, new sites having come forward and emerging evidence that was not available at the outset of the process. A strategy has been followed that was not adequately evidenced and there is now the suspicion that the evidence is being made to fit the strategy rather than leading it.

In addition, it is difficult for the public to understand the need for a reserve site when developers are so adamant in putting forward their proposals that they can and will deliver the housing they propose. There is in any case the option to review the plan every five years. Interestingly, if the government brings forward its proposals in the White Paper, then sites allocated in the Local Plan will effectively receive planning permission and the need to trigger bringing a reserve site forward would be negated for that reason.

Of the five new sites suggested in the consultation only two have direct relevance the supporters of BaSRAG. The proposed housing sites at Hook Street Farm (BER016) and Bevans Hill Farm (BER017) closely relate to the west of Berkeley and would contribute just 60 dwellings to the much larger numbers (4,590dw to 2040; 7,190dw to 2050) already proposed for the Berkeley Cluster in the draft Local Plan. Whilst we have no particular objection to those two proposed sites we are not convinced of the necessity for them. This comment aligns with our previous comments in which we ask for sensible and sustainable levels of development in the Berkeley and Sharpness area.

In summary ...

- If additional housing is required, we support a hybrid solution of options A (intensify housing within urban extension sites) & C (additional growth points)
- These new growth points at Whitminster and Moreton Valence / Hardwicke are far more sustainable in terms of employment potential and infrastructure than the one proposed at Sharpness
- We do not support the approach of identifying a reserve site or sites in case allocated sites do not come forward. Instead you should be reviewing the whole Local Plan in the light of the significant potential new sites and evidence that has belatedly emerged since the original proposals.

Please ensure all our submissions are placed before the Inspector.

# APPENDIX 1

Summary of sustainability effects of potential growth points

	SA 1:	SA 2:	SA 3:	SA 4:	SA 5:	SA 6:	SA 7:	SA 8:	SA 9:	SA 10:	SA 11:	SA 12:	SA 13:	SA 14:	SA 15:	SA 16:	SA 17:		
	Housing	Health	Social Inclusion	Crime	Vibrant community	Services & facilities	Biodiversity/geodiversity	Landscape/townscape	Historic environment	Air quality	Water quality	Floodin	Efficient land use	Climate change	Waste	Employment	Economic growth		
PS36: Sharpness Garden Village	++	++/- ?	0	0	+	+	- /+ ?	--?	-?	++/-	0	--	--?	+	0	++	++?		
PS37: Wisloe Green	++	++/-	0	0	+	+	+/-?	?	0	- /+?	--?	-	--	+	0	++	++		
WH1014: (PGP1) Whitminster	++	++/-	0	0	+	++	-?	--?	-?	--?	--?	-	--	0	0	++	++?		
HAR006-009/015-016: (PGP2) Moreton Valence	++	++/-	0	0	+	++	-?	?	-?	--?	0	-	--	0	0	++	++?		
					Key to symbols and colour coding used in the SA of the Stroud District Local Plan Review														
							score												
					++	Significant positive effect likely	8												
					++/-	Mixed significant positive and minor negative effects likely	7												
					+	Minor positive effect likely	6												
					++/- -? or +/- ?	Mixed minor or significant effects likely	5												
					-? or -- or -	Minor negative effect likely	4												
					- /+ ?	Mixed significant negative and minor positive effects likely	3												
					--?	Significant negative effect likely	2												
					0	Negligible effect likely	1												
					?	Likely effect uncertain	0												
PS36: Sharpness Garden Village	8	5	1	1	6	6	3	2	4	5	1	2	2	6	1	8	8	69	
PS37: Wisloe Green	8	7	1	1	6	6	5	0	1	3	2	4	2	6	1	8	8	69	
WH1014: (PGP1) Whitminster	8	7	1	1	6	8	4	2	4	2	2	4	2	1	1	8	8	69	
HAR006-009/015-016: (PGP2) Moreton Valence	8	7	1	1	6	8	4	0	4	2	1	4	2	1	1	8	8	66	