



Local Plan Review
The Planning Strategy Team
Stroud District Council
Ebley Mill
Stroud
GL5 4UB

14 February, 2020

Your Ref : Local Plan Review

Dear Sirs,

In my opinion, the Draft Plan has a number of shortcomings.

1. Road network. While one objective in the plan is to reduce the amount of car journeys, the limited extra employment opportunities in the area will mean the inevitability that the majority of people occupying the new housing will end up commuting by car to Gloucester, Bristol or other areas in the district. This will be further exacerbated by the land allocated for future employment not being located in the areas of proposed housing development. Para 2.28 in the plan recognises the increased pressure on the road network, but the plan seems to be lacking a strategic vision for the future other than possibly improving some junctions. Increased congestion will only increase the levels of CO₂. So why not be bold and declare that all the A419 from Fromebridge Mill to the east end of the Ebley by-pass should be made dual carriageway. Add an extra junction to the M5 at the A4135 or B4066. Make land provision for these in the plan to ensure it is not too late to do something about it. Doing it in 2040 or 2050 will be too late! Note this affects PS20, PS37, and PS24.
2. Employment. Strategic Objective SO2: Local economy and jobs – states: “Providing for a strong, diverse, vibrant local economy that supports existing businesses and encourages new enterprise – enabling balanced economic growth, coupled with enhancing skills and job opportunities across the District.” This would require that additional employment (and training) opportunities are created in areas of increased housing, but there is a mismatch in the plan between employment and housing locations. How will this be addressed? The current employment opportunities lie in Gloucester and Stroud, so these are the areas in which the extra housing should be accommodated – not to the south of the region.
3. Core Policy CP6 – Developer contributions. Anecdotally, in the past in the

district there have been several developer contributions where the developer has been able to delay, or avoid, or where contributions have been paid, but which have not been utilised for their intended purpose. There must be a much stronger and much earlier implementation of these requirements.

4. Housing requirements calculation. The housing supply in the plan table 2 is about 2000 more than required. Why impose a requirement that is more than necessary?
5. PS37 Wisloe and PS24 Cam. I have a number of issues with this proposal.
 - a. Sewerage / drainage. Every time we have a lot of rain in a short time (eg 20mm on 9th Jan 2020) our sewerage backs up meaning that the toilets do not flush properly. It will get so bad at times that I have had to call out Severn Trent at least once every year because it would not clear. I understand that the problem is partly that the pumping station in Ryalls Lane (which takes all of Cambridge and Slimbridge) is not able to cope with the flow, and also the main sewerage works in Coaley (where it is pumped to) is also unable to cope with peak flows. Therefore, no development should be allowed to start before there has been a major investment to ensure that the pumping station and sewerage works can cope with the increased flow.
 - b. Traffic. Due to the volume of traffic in both directions on the A38 in Cambridge, it can be very difficult – and dangerous – to attempt to turn right onto the A38 from Ryalls Lane. Any significant development at Wisloe or Cam increasing traffic will make this problem significantly worse, as people will not go without cars as highlighted in my comments about the road network above.
 - c. A4135. This road – especially at the railway bridge – is dangerous right now. There is almost no footpath over the railway bridge (I have seen a lady having to walk in the road with a pram as there is insufficient space). Furthermore motorists have difficulty (and therefore take increased risks) when passing cyclists going north due to poor visibility around the corner. All of the stretch between the motorway bridge and the Shell garage should be widened with dedicated footpaths and cycle lanes. This really needs to be done now and certainly before any development at Cam or Wisloe putting more traffic on that road.
 - d. Planning process. The Wisloe proposal has come ‘out of the blue’, and is completely at odds with the previous policy of ‘dispersal’. It is going to create a monster.
 - e. Wisloe lies in Cambridge, which is classified as a tier4a settlement where ‘very limited infill and re-development to meet specific local needs may be permitted’. Nothing has changed, except that someone wants to line their pockets by selling off some land.
 - f. This proposal would effectively merge Cam, and Cambridge, and Slimbridge into a large urban sprawl, losing their individual identities. This does not comply with Strategic objective SO6: Our district’s distinctive qualities.
 - g. Brownfield sites. Stroud has about 73 Ha of brownfield sites. These should always be used in preference to green fields. At a reasonable density this could be enough for 3,700 houses that would be far more suitable than building on fields. This could also give the opportunity to create a higher number of more ‘affordable’ homes.

- h. Services. If I want an appointment with my GP, today, the earliest that I can get one is one week from now. This is already unacceptable. Putting a lot more people in the area will make access to services such as GPs much worse. The area cannot support it. Dispersal would be more equitable to spread the load around the whole region.
 - i. Noise. We already get quite a lot of traffic noise at our house from the A38 and the M5, especially when the wind is blowing from the south or south-east – which is quite often. The Wisloe and Cam proposals will suffer from even greater noise as they are nearer, and at our house, we will suffer more noise from the extra traffic from these developments. The developers have stated that they will have to incorporate extra features to reduce noise in the houses, but what will they do to keep noise outside to an acceptable level? A few trees won't do it!
6. An alternative site for housing development is along the south side of the Ebley by-pass. This should be considered as a matter of urgency.

In conclusion, I do not support the Draft Local Plan in respect of housing growth.

Yours sincerely,

