

Strategic Infrastructure

**Shire Hall
Gloucester
GL1 2TH**

Date: 22nd January 2020

**Stroud District Council
Ebley Mill
Ebley Wharf
Stroud
GL5 4UB**

Dear Sir/Madam

Stroud District Local Plan Review: Draft Local Plan Public Consultation

Thank you for consulting Gloucestershire County Council (GCC) on the above matter. I have the following officer comments to make.

Archaeology Comments

General comments

Policy and strategy in relation to archaeology and historic landscape are included in the 40 key issues, the district vision, Strategic Objective SO6, Core policies CP4 and CP14, Delivery Policies ES2 and ES10, and the vision for Cam and Dursley (other local visions only refer to built heritage or don't mention heritage).

The use of the restrictive phrase 'built heritage', except where the context is building specific, or 'built and natural heritage' (for example in the title above ES6 on page 185 or the vision for the Severn Vale), seemingly excludes historic landscapes and archaeology. Whilst that is presumably not the intention, more inclusive phrases such as 'natural and historic environment' would be far preferable throughout the plan.

The commissioning by SDC of an archaeological desk-based assessment for the proposed Wisloe development provides an appropriate evidence base for plan allocation. It isn't clear, however, to what extent a heritage evidence base beyond the NHLE exists for other proposed allocations. For example, Sharpness is proposed as the largest single contributor to housing need in the district but although there has been some archaeological evaluation of various individual areas in relation to previously proposed development, to our knowledge there has not been any co-ordinated heritage assessment of the proposed garden village to feed into design proposals. HER information and draft archaeological advice for any existing or proposed allocations are offered to SDC on request.

Specific points

P24. The addition of heritage to SO6 since 2015 is supported.

P140. The addition of a specific reference to archaeology (since the 2015 plan) in the key issues for the Cotswolds Cluster is supported

P186. ES7 appears to only include 'natural' landscape features as being worthy of protection outside the AONB. Historic landscape features constitute equally to the value of landscape and should also be included.

Ecology Comments

We note there is an Habitats Regulations Assessment (HRA) Report to accompany this draft local plan and that it will be available soon. If it raises any significant concerns on HRA matters we will broach them at the pre-submission stage of the local plan review process (Autumn 2020).

It is good to see that conserving and enhancing biodiversity is quoted as one of 6 key issues that the local plan is trying to address. This is to be focused through Strategic Objective SO6 (Our District's distinctive qualities) but also in part through SO5 (Climate Change) and the other strategic objectives.

It is noticed that protecting and enhancing the natural and historic environment remains usefully embedded within the proposed Core Policy CP4 (Place Making).

We see that environmental impact of new strategic developments will be minimised through retained Core Policy CP5 (Principles).

Proposed new policy DHC7 (New Open Space - replacing ES14) is useful and reinforces a need for new accessible open green space near to new developments than link into existing Green Infrastructure (GI) provision.

Given the direction of government policy and intentions it is welcomed that revised Core Policy CP14 (High Quality Sustainable Development) includes an expectation for biodiversity net gain.

Reference to managing and expanding the capacity of the natural environment is an essential part of the revised Delivery Policy ES5 (Air Quality).

Delivery Policy ES6 (Providing for Biodiversity and Geodiversity) has been carefully updated to reflect the latest version of the NPPF and PPG. This is a detailed, informative and ambitious policy but is a warranted approach given the continued decline in biodiversity nationally and beyond. At the next stage of the plan supporting text should be added to provide some context including the vision and work programme of the Local Nature Partnership, in particular on Nature Recovery Networks. Revised Delivery policies ES7 (Landscape Character), ES8 (Trees, hedgerows and woodlands) and ES11 (Canals) are also supportive of biodiversity conservation and so are helpful.

New stand alone Design Policy DES2 (Green Infrastructure) is most welcome given District and wider County aspirations to preserve, improve and extend green space. New green infrastructure will help to mitigate potential increased recreational impact on designated sites in the District and beyond.

Education Comments

Further to the comments submitted in response to the emerging strategy report last year we have the following additional comments to make. :

Following a survey of recently completed housing developments across the county, GCC has revised its Pupil Product Ratios (PPR) for the numbers of additional pupils generated by every 100 additional dwellings as shown:

Phase of education	PPR / 100 dwellings
Pre-school	30
Primary	41
Secondary	20
Post-16	11

GCC will seek funding contributions from housing developers towards the additional school places generated by each development. In addition, where it is not possible to expand existing schools to meet the demand generated by new housing, GCC will request provision of suitable land for a new school site. Full details of education requirements for new housing developments are described in the GCC Local Developer Guide, which is published on our website.

Flood Risk Management Comments

Key Issues

- It is good to see mention of natural flood management in KI 25, but no specific mention of wider environmental benefits of well-designed SuDS;
- Welcome mention of flood risk in relation to public health under KI 35, but would benefit from specific mention of mental and physical health benefits of proximity and access to green space as a result of integrating SuDS / flood alleviation measures with green space provision and management.

Strategic objectives

- SO5: Welcome mention of flood resilience alongside water resources and quality.

Making places

- Decline to offer specific spatial comments on flood risk and mitigation as the majority of area-specific chapters refer to floodplain as principal physical constraints, and some areas refer to specific mitigation measure, e.g Severn Vale reference to River Sever defences (p126).

Core policies

- CP8 should include reference to SuDS;
- CP11 – welcome mention of SuDS, but fails to expand on multiple benefits; and
- CP14 – specific inclusion of SuDS and flood risk mitigation here are welcomed.

Delivery policies

- ES1 should include reference to SuDS design best practice and the SuDS hierarchy (Perhaps mentioning the CIRIA SuDS Manual); and
- ES4 is sufficiently comprehensive and the level of detail is welcomed (however mention of ‘Rural SuDS project’ should include ‘Natural Flood Management’ as it is a much more widely recognised term), but there is insufficient cross-referencing of this section elsewhere in the document.

General comments:

- The plan takes a comprehensive overview of flood risk and mitigation;
- The integration of flood risk management with other multiple benefits is welcomed;
- Insufficient attention is paid to the cross-policy benefits of SuDS in development areas;
- Detail on flood risk concentrates of floodplain and fluvial flooding, but insufficient attention is paid to surface and groundwater flood risk, especially within place-based sections and development opportunities; and
- Insufficient detail on the roles played by various partners and groups with a stake in water resource and flood risk management from LLFA to local flood action groups.

Minerals and Waste Comments

Please find below a suite of individual representations prepared by officers of Gloucestershire County Council in its capacity as Minerals & Waste Planning Authority (MWPA). The representations are concerned with the draft version of the Stroud Local Plan Review, which was published in November 2019.

Paragraph 1.11, page 7

Officers of the MWPA acknowledge the reference to the county's minerals and waste local plans and that the site allocations located in Stroud District for potential strategic residual waste recovery facilities are to be included on the Policies Map.

Key Issues for economy and environment, pages 15 and 17

Under the key issues for economy, officers of the MWPA strongly encourage that; '*...transitioning to the circular economy*' is effectively incorporated into one or more of eight issues identified.

In light of the headline statement mentioning recycling, officers of the MWPA strongly encourage that specific support is also afforded to relevant waste functions within one or more of the nine issues identified. For example, references should ideally be made to: - *minimising the amount of waste that is generated; facilitating an increase in the volume and quality of waste recycling; and utilising secondary and recycled materials in preference to primary, raw materials.*

Vision 2040, page 22

Officers of the MWPA consider that for consistency purposes with the other of changes advised, the 'Vision 2040' would benefit from including references to: -*the transition to the circular economy, facilitating high quality reuse and recycling of materials; and reducing the amount of waste being generated.*

Strategic Objective SO5: Climate Change and environmental limits, page 24

Officers of the MWPA broadly support the content of Strategic Objective SO5 and the references made to minimising waste and the recycling of building materials. However, the objective would be improved if it was expanded to incorporate; *‘...supporting an increase in the volume and quality of waste recycling and facilitating the transition to the circular economy.’*

New Core Policy DCP1, page 47

Officers of the MWPA are disappointed that the new proposed core policy doesn't offer specific support for any of the following waste-management related measures, which will undoubtedly have a significant influence upon achieving the local carbon neutrality ambition by 2030: - *transitioning to the circular economy; reducing the amount of waste being generated; and supporting an increase in the volume and quality of waste recycling’*

Core Policy CP4, page 53

It is noted that no significant changes are proposed to Core Policy CP4. It is also welcomed that part 3 of the policy makes reference to adequate waste and recycling storage. However, in light of the scale of change likely to be required to deliver the ambition of carbon neutrality by 2030, officers of the MWPA consider that the policy would benefit from a few additions. This would be in respect of acknowledging the potential carbon reduction impacts of supporting the adoption of increasingly progressive waste management-related measures. For example, the latter part of point 3 could be revised to read; *“...and provide adequate storage (but not exclusively external) space to facilitate efficient and effective high quality waste recycling and disposal...”*

Core Policy CP5, page 54

It is noted that no proposed change are being brought forward for Core Policy CP5. However, in light of the scale of change likely to be required to deliver the ambition of carbon neutrality by 2030, officers of the MWPA consider that the policy would benefit from a few additions. This would be in respect of acknowledging the potential carbon reduction impacts of supporting the adoption of increasingly progressive waste management-related measures. For example, part A of the 2nd section of the policy could be revised to read; *“Sustainable sourcing of materials, which demonstrates a high degree of material efficiency through including recycled content and is efficient and durable...”*

Draft vision to 2040: “Growing a sustainable community at Hunts Grove and preserving Gloucester’s rural hinterland...”, page 104

Officers of the MWPA acknowledge the reference to ‘Javelin Park’ as a potential positive stimulus for complementary innovative business opportunities and CHP. However, the terminology used to describe ‘Javelin Park’ (...the waste incinerator...) is pejorative. The planning and environmental licensing status of the facility is as an Energy-from-Waste (EfW) plant. This is how it should be described



Policy PS43: Javelin Park, page 107

In line with national planning and waste planning policy, officers of the MWPA advise that the site allocation text be revised so as to specifically reference the need to safeguard the efficient and effective operations of adjacent existing permitted / allocated waste management infrastructure.

Policy PS34 Sharpness Docks, page 118

In line with national planning and waste planning policy, officers of the MWPA advise that the site allocation text be revised so as to specifically reference the need to safeguard the efficient and effective operations of existing, permitted waste management infrastructure.

Policy CP8, page 151

Officers of the MWPA consider that the policy would benefit from further changes to assist with the plan's overall emerging ambition to support carbon neutrality in Stroud by 2030. There will be noteworthy benefits to achieving carbon reductions through the incorporation of policy support for the adoption of increasingly progressive waste management-related measures. In particular point 4 of the policy could be expanded. Example revised text for point 4 reads as follows; *"...Use increasingly sustainable construction techniques that incorporate durable materials with recycled content; facilitate efficient and effective high quality household waste recycling and provide renewable or low carbon energy sources in association with the proposed development and..."*

Core Policy CP11, page 164

Officers of the MWPA consider that the policy would benefit from further changes to assist with the plan's overall emerging ambition to support carbon neutrality in Stroud by 2030. There will be noteworthy benefits to achieving carbon reductions through the incorporation of policy support for the adoption of increasingly progressive waste management-related measures. In particular point 4 of the policy could be expanded. Example revised text for point 4 reads as follows; *"...Use increasingly sustainable construction techniques that incorporate durable materials with recycled content; facilitate efficient and effective high quality commercial waste recycling and provide renewable or low carbon energy sources in association with the proposed development and..."*

Furthermore, the requirement to demonstrate the principles of industrial symbiosis is broadly supported by officers of the MWPA. However, it may be better understood by future plan users if it is articulated through references to the 'circular economy'. The term 'circular economy' is already featuring heavily in emerging national environmental policy such as the government's Resource & Waste Strategy and supporting documents for the Environment Bill.

Please do not hesitate to contact the MWPA team at Shire Hall via our email: - m&wplans@gloucestershire.gov.uk if you have any queries or questions regarding the above representations to the emerging Stroud Local Plan Review (Draft Plan) consultation.

Public Health Comments

I understand discussions are taking place between our Public Health team and SDC and that a health impact assessment was held on 16th January.

Highway/Transport Comments

1. Do you support the Council's preferred strategy for meeting Stroud District's future growth and development needs?

The purpose of the planning system is to achieve sustainable development, and one of the primary manifestations of that sustainability is the extent to which the development facilitates reduced private car use and modal shift away from the private car through its location, design and layout and its role in increasing land use connectivity.

The draft Plan identifies a priority issue as "... Ensuring new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development, including by:

- Concentrating housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure;
- Creating new sustainable communities at locations where development can transform existing access to services and infrastructure;
- Concentrating employment growth within the A38/M5 corridor and at locations in tandem with housing growth"

GCC strongly endorses this. It also supports the new town centre section within the draft Plan, noting the changing role of town centres / streets and destination purposes within the plan period. The plan recognises that the role of settlement centres, in transport terms, in Stroud District will change dramatically as will trip purpose due to the changing role of town centres, less location-dependent lifestyles and the push pull factors for trip demand are likely to alter significantly.

GCC welcomes that the draft Plan is accompanied by a Sustainable Transport Strategy, however, it must be noted that the Highway Capacity Assessment outputs have not yet been provided. Therefore, support for the Local Plan is only in-principle at this stage and is subject to a review of the modelling and associated mitigation package(s) requirements. Details of how such mitigation package(s) will be funded should also be provided as this appears to be a critical piece of evidence required by the Planning Inspectorate. .

GCC would like to request opportunity to make a formal response on the Highway Capacity Assessment and the proposed transport mitigation strategy, once it becomes available, which may be after this current consultation period. We would welcome confirmation that SDC will accept this additional response from GCC.

2. Are there any additional issues or constraints relating to the proposed sites? And how should specific constraints, needs and opportunities be reflected in the final site allocation policies?

Stroud is a rural district containing market towns. It is traversed north/ south by a rail/ motorway transport corridor and there is high external transport demand in the authorities adjacent to it. These external transport effects will have significant impacts on transport provision and resilience within Stroud District, both with regard to local and strategic trips. Significant growth is occurring along the M5 corridor (focused on Gloucester, Cheltenham and Bristol) – which currently impacts on Stroud and which will impact more on Stroud within the emerging Local Plan period.

Stroud District Council proposes significant development sites in potentially sustainable locations. The strategy will concentrate housing growth at the main towns of Cam and Dursley, Stonehouse and Stroud, where there is best access to services, facilities, jobs and infrastructure, and where the potential role of the rail network and station hubs is most clearly realised. The County Council is supportive of this approach. Even so, the Highway Capacity Assessment of all the Local Plan proposals needs to be completed, interpreted and applied to mitigation measures in association with those development progressions. GCC will provide a response to SDC on the Highway Capacity Assessment once it has been received and analysed.

The transport sustainability will depend on various factors, and it will be useful to underpin them with an Indicative Access Strategy and a strong context of neighbourhood creation onto transport networks. This is particularly important in Stroud District where the geography and topography leads to ribbon settlement patterns which must first and foremost centre on places where people live.

The draft Local Plan proposes that the Housing and Employment growth will be centred at two new settlements at Sharpness and at Wisloe within the Severn Vale (A38/M5 corridor), with the intention to create new sustainable communities along garden village principles. Further strategic employment growth will also be concentrated at accessible locations within the A38/M5 corridor.

With regard to **Sharpness**, the basis of reinvesting in a port town is interesting. It is a highly distinctive area with very desirable characteristics. However, it is land locked to its west (by the River Severn estuary) and currently poorly connected to the M5/ A38 corridor to its east. If the resilience of this corridor is ever compromised or traffic demand exceeds its capacity then Sharpness may be isolated for periods of time in transport terms. It is recognised within the plan that development at Sharpness and other sites is likely to depend on improvements to M5/ junction 14. GCC previously also raised concerns about junction capacity issues with the relatively minor highway network links from this area to the A38 corridor, though as stated above, we are unable to comment further on these issues, until the Highway Capacity Assessment for the Plan is completed.

GCC previously raised concerns that, given its geographic location, transport options and solutions for a new settlement in Sharpness may remain limited. While there is potential to extend bus services, these would have to be commercially viable, while providing attractive frequencies and minimising journey times, to provide a viable alternative to the car. The promoter material published alongside the draft Plan, makes some suggestions for public transport provision to the site, however, Sharpness will need to comprise significant volumes of development before it can begin to create a critical mass for viable, multi-modal transport and service provision. Phase 1 of delivery proposes 2,400 dwellings by 2040 and Phase 2 an additional 2600 by 2050. This level of development is unlikely to be sufficient enough to create that critical mass for investment in measures to support transport mode shift that would see the high levels of sustainable transport accessibility aimed for by the plan.

In particular, demand for a Rail link at Sharpness will be inherently compromised. It is still not known whether there is sufficient network capacity to accommodate a new service to Gloucester from Sharpness or whether it is financially viable or value for money. In addition, the evidence provided suggests that

approx. 60% (AM) and 40% (PM) of trips would be made into south Gloucestershire and Bristol, which would not be served by the introduction of a direct link to Gloucester, but would have to change at Cam and Dursley Station. GCC is undertaking some further modelling work, to understand the viability of a new rail service from Sharpness to Gloucester via Cam and Dursley and we will feedback the outcomes of this modelling exercise, once available. It is also understood that Network Rail is currently looking at the line capacity between Sharpness and Gloucester for additional services which will also be crucial evidence to understand the viability of the proposed rail link. Even if it is demonstrated that there is network capacity, it must also be demonstrated how this would impact upon Gloucestershire's wider ambitions for increasing frequencies on other regional or high speed services.

If a rail based transport system is not forthcoming other means (such as express bus services utilising the A38) would need considering together with details provided of how this can be realistic and attractive, in regards to journey time and as an alternative to the private car. Viability of express bus services will also need demonstrating as, like with the proposed rail solution, there may not be the critical mass required to make the service work. As discussed above there is a requirement to set out in the emerging Local Plan, how all of the transport facilities and mitigation will be funded.

The Sustainable Transport Strategy states that measures would be provided to encourage higher levels of trip internalisation within the development site. The promoter details (Para 8.4 – 8.7) suggest 4,700 (AM) and 4,200 (PM) total person trips, with 2000 of them travelling to/from the Sharpness area. That suggests a high level of trips will remain in the Sharpness area. However, it is currently not clear, how this would be achieved. Phasing of development may have an influence on the success of internalisation and opportunities to support this would need to be in place from first occupation in order to shape travel behaviours. Questions remain on how the measures proposed for internalisation as well as other sustainable measures such as the rail/bus services, electric charging capability and Mobility as a Service (MaaS) solutions could be funded and delivered. Furthermore, it needs to be ensured that these measures are accessible for all including low income households.

These uncertainties detract significantly from the site's viability in transport terms. It may be that in delivering some potentially sustainable sites in the longer term – like Sharpness - there will be a significant period of time (the extent of the Local Plan time frame) during which the development will be highly car dependent and service poor. In this case key safeguards will be: -

- The need to ensure that development layout and delivery does not preclude opportunities for enhanced connectivity and mode shift in the future when demand can genuinely grow;
- The need to carefully consider the issue of social and digital connectivity. For example, in early delivery phases, it would be expected that there would be a higher level of car dependency rather than more public transport reliant socio-demographics;
- The need to note that much of the potential for cycle links is currently within the quiet road network serving this site. What will safeguard or replace those quiet qualities which invite walking and cycling?

At **Wisloe** there is the potential to provide a development stepping stone which helps open up access on the east/ west corridor, and unlocks sustainable transport opportunities between Cam railway station, Stonehouse (west) and Sharpness, if an in-depth masterplan approach is applied to the wider area. Therefore, the premise on which this is based needs unpacking around a potential shuttle service, footbridge and new crossing over the M5 motorway. Development located in proximity to Cam & Dursley station needs to maximise opportunities for sustainable connectivity to it and create a key strategic interchange location. This is particularly prevalent as Cam & Dursley station is the **only** rail station in the

district that provides access to Bristol and the South West. On a local level the need for these measures, in association with development at Wisloe, will be vital to creating opportunities for sustainable transport movements and overcoming barriers to movement and issues of severance that the current M5 and railway have upon this proposal. Without this planned approach and a clear strategy on how measures to link the site to sustainable transport options are funded, the potential for development at Wisloe to achieve these benefits could be severely compromised.

The site at **Whaddon**, south of Gloucester, is stated within the Draft Local Plan as a potential site to accommodate Gloucester's housing needs and requires more work as part of the JCS review. Nonetheless comments have been provided here for consideration should the allocation come forward formally.

Whilst Whaddon is located near a major settlement, i.e. Gloucester City, it is still constrained in terms of its geography of movement opportunities and access to services. This could create a situation where people living here will experience a suburban lifestyle with limited public transport links or services in their vicinity. There are few places to walk to which are not prohibited by the railway line to the west and M5 to the south. This convolutes any walk trips to adjoining local centres in Kingsway and Quedgeley and restricts city centre walk and cycle access to one route north (A4173) through the constrained A38/Stroud Road area.

The informal cycle network depends on the quiet lane network, which due to the limitations to movement may be subject to increased traffic flow. Vehicle trips from this development are likely to impact upon the A38 corridor which contains two key junctions (St Barnabas roundabout and Cole Avenue traffic signals junction) that were seen as exceeding capacity during the Gloucester, Cheltenham, Tewkesbury Joint Core Strategy adoption process (undertaken during 2015/2017). The results of the Highways Capacity Assessment for the Stroud Local Plan will show how these junctions would perform with the proposed allocation. Congestion and journey time delay on the principal local road network may also encourage residents to utilise the less suitable rural country lanes to access the Strategic Road Network (SRN), e.g. the M5 via Junction 12.

The potential Whaddon site has proposed a new rail halt and is stated as safeguarded in the draft Local Plan. Has this land been safeguarded and how? The provision of a halt here is in close proximity to the land safeguarded for a new railway station at the Hunts Grove development. Further evidence would need to be provided on the feasibility of this/these station(s) and how they can be funded and delivered.

With regard to other proposed sites:

Land at Hardwicke:

The Hardwicke site is less constrained than the Whaddon site and has better access to the A38 which offers public transport potential. However, the likely impacts upon the wider A38 corridor, particularly the two junctions exceeding capacity at Cole Avenue and St Barnabas roundabout, would still need consideration. GCC would request the ability to make further comments following review of the results of the Highways Capacity Assessment work. This site could also benefit from the Gloucester-Sharpness Canal and its tow path that offers direct access to the city centre. This would be a good walking and cycling link for perhaps the casual user or for leisure purposes. Other means to encourage additional cycling should be considered as well.

North/Northwest Stonehouse:

The Sustainable Transport Strategy states that development here should contribute to sustainable means. This is welcome, but further detail of what those measures could be should be provided, alongside costs and funding mechanisms. The A419 corridor has good scope to accommodate an interchange in proximity to M5 J13 and in combination with new or enhanced cycle links to Stonehouse/Stroud and north to

Gloucester. The lack of connectivity between Stonehouse and Bristol via Rail is raised as a key issue but no measures proposed other than cycling.

West Draycott:

Cam & Dursley station does have a lack of parking however, similarly to the Wisloe site the road network and railway line act as barriers to walking and cycling. Measures to overcome this are to be supported and encouraged in order to minimise short car based journeys.

Stroud Valley:

Topography creates constraints, but there are opportunities for mode shift. The Stroudwater canal offers opportunities for walk and cycle trips between Stroud and Chalford. However, the canal offers this opportunity for only some sector of the community. One of the issues this brings into relief is the need for an over-arching masterplan showing multimodal opportunities and measures needed to safeguard transport choice when it becomes more viable in the long term future.

3. Are any further changes to the proposed policies necessary? Are there specific things that should be included in supporting text?

In looking at the allocations, the dependence on mode shift transport opportunities is of paramount importance. This is the underpinning rationale. Understanding that there will be a 'transitional period' prior to achievement of such mode shift opportunities and goals, what will the contingency and mitigation measures comprise? How will phasing support this? And what innovations will be expected of developers and delivery agents? The findings and decisions arising from the Sustainable Transport Strategy modelling – work being undertaken as part of the current Highway Capacity Assessment exercise, will need to be brought into the supportive text and form the basis of the mitigation strategy. The transport sustainability measures proposed are supported in principle however, there needs to be evidence of how these measures are feasible, deliverable and funded, and the extent to which they will result in a positive reduction in Single Occupancy Car trips. It is also important to recognise the huge role of the digital economy, as highlighted in the Local Industrial Strategy, in enabling transport mode shift at all, and therefore the need for transport and digital inclusivity.

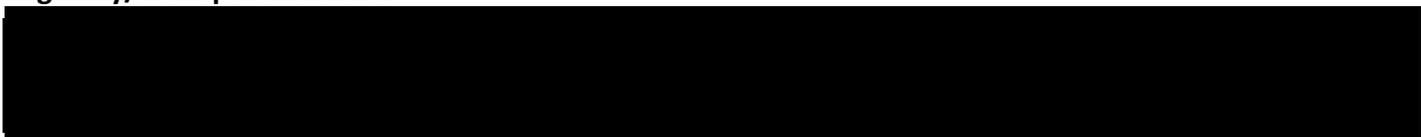
There is great potential for Transport Capacity Building in Stroud District, and significant need to do so. However, there will be important stages to achieving this which will rely on a clear vision, a transport masterplan and mode shift objectives in relation to development phased delivery.

Rail Comments

The stance set out for policy EI14 is supported. Given the number of proposed new stations/halts in the draft Plan it is unlikely that all of them will be viable/deliverable even over a long time period. As stated in the document, the Gloucestershire Rail Investment Strategy will provide a steer on future rail investment in the County and inform the emerging growth strategy for Stroud District.

Support for improvements to Cam and Dursley station is welcomed. The station has a key role to play in providing sustainable travel options to the south of the district for existing and planned new growth.

Highway/Transport Authors:



If you would like to discuss any of the points raised above please do not hesitate to contact me.

Yours faithfully

