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Comment on Local Plan 2019

The plan promotes Wisloe as the site for a garden village with 1500 dwellings, five hectares of employment land and some local facilities, including a primary school.

The latest revision of the Local Plan appears to have ignored the consultation responses following the previous version which generally favoured the dispersal options over the options of concentrating housing at growth points.

The rationale for identifying and promoting the Wisloe site appears to be that it is within the A38/M5 corridor, not AONB or identified as flood plain, its proximity to Cam and Dursley Station, an easy option for the hard pressed planners and availability, the landlords of the site, GCC and the Ernest Cook Trust, having offered the land.

The plan for a garden village Wisloe should be reconsidered for the following reasons.

1. The proposed site for residential development is too close to the M5. The mitigation measure promoted by the plan to free residential areas from noise pollution are unrealistic, both operationally and achievably. The motorway is on a raised embankment for most of the route through the site. A bund would need to be substantially higher. Triple glazing is an effective measure, but as there is a proposal for a primary school, this suggests that the planners are anticipating children living here. The gardens of the properties will not be protected from noise pollution. Will families be expected to remain indoors with their children behind firmly closed triple glazed windows? If so, a health centre should be the first building to become operational on the proposed site, to provide the necessary care for children diagnosed with rickets.

Should SDC persist with this plan, members of the planning department should be encouraged to relocate their households to the properties nearest the motorway. (The site will benefit from rapid bus services, so no problems with carbon emissions on the way to the office.)

2. Although described as a garden village with its own facilities, Wisloe will effectively be an extension of Cam and Dursley. The 'landscape buffer' between Cam and the motorway will be the motorway itself, hardly an effective barrier to discourage the residents of Wisloe using Cam and Dursley as their social and commercial centres. The plan gives no indication of a new secondary school or leisure centre so the focus for these is likely to be Dursley.
3. It would be helpful if the Local Plan document could cite some recent UK successes in the development of garden villages of the scale proposed here. The site appears too large at 1500 dwellings to exist as a 'village', but too small, and too close to the communities of Cam and Dursley to function independently.
4. One of the criteria for 'garden city principles' is locally accessible work. SDC states that one of its priority issues is to locate employment growth at locations in tandem with housing growth. The proposed plan proposes only five hectares of employment land at Wisloe, whilst intending to construct 2350 new dwellings at Cam and Wisloe. This compares with Sharpness and Sharpness Docks where 5300 dwellings are proposed by 2050 with 17 hectares of employment land. This is not tandem growth, this is penny farthing growth.

The Dursley and Cam area already lacks sufficient local employment opportunities for its current population when compared with Stroud, Stonehouse and Nailsworth. (Ref Figure 11 Stroud District Employment Distribution, Stroud Sustainable Transport Strategy Benchmarking Report p28). Data from the 2011 census (cited in the Transport Strategy Benchmarking Report) suggests that residents living in the Wisloe area travel between 19-22 km to work. A high proportion of the existing working population of Dursley and Cam require to travel to employment beyond reasonable walking and cycling distances.

The 2011 census (Table A) shows that, for Dursley and Cam compared with the district as a whole, a lower proportion of the working population work mainly at home and a higher proportion are travelling to work by car.

Table A Method of travel to work, Dursley and Cam compared with Stroud District Overall (Census 2011)

Travel to work method	Dursley & Cam (East and West)*	Dursley & Cam (East and West)	Stroud District**
Mainly work at home	388	5%	9%
Walk	721	10%	9%
Cycle	106	1%	2%
Bus, Minibus or coach	119	2%	2%
Train	112	1%	1%
Car or Van passenger	433	6%	5%
Driving Car or van	5305	73%	70%
Other	124	2%	2%
Total	7308	100%	100%

Census 2011 Small area Stats.

** Table 3 Stroud District Employment Distribution, Stroud Sustainable Transport Strategy Benchmarking Report p29.

The 2011 data also shows that people living in the Dursley and Cam areas are making as much, if not more, use of the public transport available as the rest of the district. They are also walking more and car sharing for their journeys to work. At the time of the census, the bus services to Gloucester were more frequent, the train frequencies were almost as they now exist, yet those services were only used by less than 4% of the working population. This suggests that the services were not providing (whatever their frequency or speed) the necessary flexibility required for travel to work.

The Benchmarking Report reports that passenger traffic at Cam and Dursley Station has increased by 20% over the period 2010/11 and 2017/18. Whilst this is excellent news, road traffic surveys indicate a rise of 23% in road traffic on the A4135 close by Wisloe between 2011 and 2018, with a similar increase at Cambridge on the A38 over the same period.

Bus routes and rail lines cannot now fulfil the needs of many workers because of more flexible working hours, the staffing demands of the service and retail industries and the location of many employment opportunities outside the immediate centres of Gloucester, Cheltenham and Bristol. The Local Plan stresses the importance of Cam and Dursley Railway Station and the proposed improvements in the station. It promises improved cycle and pedestrian access and rapid bus services. Whilst these improvements, if forthcoming, will improve the travel to work options of the local population and a development at Wisloe, the majority of residents of any new development at Wisloe will be dependent on the car for their journeys to work unless more employment opportunities are located within realistic walking or cycling distance.

Any plan to develop land at Wisloe should consider a substantial increase from the five hectares proposed for business use. SDC should be working to relocate businesses to this area of the district if it wishes to achieve the substantial reduction in carbon emissions by 2030 to which it claims to aspire. Residential development should be limited until more employment opportunities are established here.

5. SDC identified the Slimbridge parish as an ideal location for any facility servicing the whole of its district when it chose to site its Waste Transfer Facility at Gossington. The local plan identifies the need for 650 care home bedspaces. Wisloe would be the ideal location for these. The residents would not be adversely affected by proximity to the M5, indeed views of the passing traffic might provide entertainment during daylight hours. It would create substantial employment opportunities close to Cam and Dursley, accessible via the many new walk and cycle ways proposed for the district. It would provide a boost to local small businesses. The current bus and train services operate within the hours when most visitors are likely to attend which, coupled with stiff parking charges, would fit well with SDCs carbon neutral policies.

Best wishes,

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