



In general the aspirations and the policies in the plan are well considered and positive, and the document commendably clear and attractively presented. However, I am concerned about the site-specific allocations, and the degree to which they are consistent with the overarching goal expressed in Core Policy DCP1. Because my comments cut across many aspects and places, I did not attempt to answer on-line.

Timescale for carbon neutrality

Core Policy DCP1 aspires to deliver carbon neutrality, which in the context of the climate emergency I fully support. The stated timescale is 10 years, carbon neutrality by 2030. This contrasts with the government's timescale of 30 years, by 2050, which also accords with the carefully assessed guidance from the IPCC. 2030 is not possible to achieve. It would imply that all buildings in the District are retrofitted for near zero-carbon energy efficiency levels, all heating and electricity to be provided from renewables, all industries to use only renewable energy, all vehicles to be electric, from renewable sources, and existing petrol/diesel vehicles scrapped; plus any residual carbon emissions compensated by very extensive tree planting.

Most of this is beyond the power or remit of the local authority, let alone the Local Plan. The policies in the Plan would not begin to deliver it. The assumption has to be that Core Policy DCP1 in reality is a political or motivational statement, for public consumption, not a technical planning policy. However, the subtext of the policy has valuable statements, which I support. ***My recommendation is therefore to replace 2030 with 2050, in line with UK policy. This still provides a huge challenge, but is one that is appropriate in relation to the climate crisis and the wider policy context.***

Healthy and sustainable travel

Below the headline policy statement, DCP1 prioritizes, amongst other things, reducing the need to travel and discouraging private vehicle use, while promoting walking, cycling and public transport. These are sound policies and I want to focus on aspects of their implication in a moment. They are sound not only because of the climate emergency, but also for health and equity reasons, recognised in the plan. Physical activity is critical for health and well-being, relevant to tackling the obesity crisis, diabetes, mental illness, health inequalities and so on. The value of active travel - daily walking (and/or cycling) – has been attested by a huge amount of research. Stroud District is, however, a very car-dependent area. This is partly due to the relatively dispersed pattern of settlement. If the aspirations of the plan are to be achieved, any new development needs to be integrated with existing towns so that people have both the opportunity and the incentive to walk, cycle and use public transport.

There is ample evidence, from Europe and the UK, of what works and what does not. Most of the proposed new developments will not be able to achieve the modal shift required; they would be, for the foreseeable future, largely car-dependent.

I am of course aware of the process by which these sites have been identified, which is clearly explained in the document. The reliance on the call for sites from land-owners and developers at the outset is a fundamentally flawed process, for which SDC is not primarily to blame. Nevertheless, the resulting sites still need to fulfil the policies of the authority. If the result of such a call is sub-optimal sites, then there is a responsibility to make a renewed appeal and engage actively with land owners who own land in good sustainable locations.

I have not been in a position to undertake detailed locational and site analyses. Subsequent site-specific comments rely on the published statements, developer spatial frameworks and my own background knowledge. Apologies that I have not been able to evaluate all the proposed greenfield developments.

Stonehouse: residential development north of Great Oldbury

PS19a extends Great Oldbury northwards to the west of the railway line. It is cut off from the vital services offered by Stonehouse (retail, educational, etc), with inadequate connections, and too far (and not attractive) to walk for most people. There is no indication on the plan of any new bridge enabling the site to be more directly linked to Stonehouse, maybe with a high quality cycle route. In this it suffers in the same way as the already approved development of Great Oldbury itself. The more logical site for an urban extension east of the railway, immediately north of Stonehouse, has not been considered, despite much of it being in public ownership (GCC). Nor has the possibility, raised by the Stroud Futures group (Nicholas Falk, co-ordinator), of a new station near the Black Bridge, as an alternative to the proposed reopening of the old station on the Bristol line, been examined. Such a station would potentially offer the best rail connections of any station in the District. If PS19a is retained in the plan, the potential for such a station should be protected, the new development should pay for excellent pedestrian, cycling and potentially bus connections across the railway to Stonehouse. Even so, the relative distance of the site from existing services will inevitably mean that car use will be high. The aspirations of the Core Policy will not be achieved.

Stonehouse: commercial and leisure development at the motorway junction

PS20 fulfils the hopes of Ecotricity. While the designs for the stadium are exciting, it does not alter the fact that this location for business and leisure will be very largely private car and vehicle based. The scale of the car park proposed for the stadium is a simple indicator of the transport reality. The expectation is that the commercial element will take the form of a business park, with maybe some distribution facilities attracted by the motorway junction. Such business parks are profligate users of land because of their car parks, and typically at least 90% car dependent. There is no indication that the mould will be broken in this case. Both business and leisure activities would ideally be integrated into, or closely linked to, town centres offering good train, bus, bike and walking accessibility.

Cam and Wisloe Green

PS24, PS25 and PS37 together constitute substantial growth in the Cam area, but the sites chosen do not cohere into an integrated town. There is no indication of an overall plan or spatial framework that might begin to tie the rather disparate sites around Cam together. The proposed development of Wisloe Green is completely disconnected from the existing town (45 minutes walk), and therefore has to be seen as a new settlement. As such its eventual population is inadequate by itself to support many facilities. If it succeeds in attracting retail or other facilities because of its location on the A38, then that could bring wider benefits, though the risk is it undermines the viability of facilities in existing settlements. Given the house-price gradient from Bristol, the main function of Wisloe Green is likely to be as a commuter settlement, it could become an 'exurb' rather than a village. ***What is certain is that, despite the station nearby, Wisloe Green would be a highly car-dependent settlement, exacerbating congestion, with a heavy transport carbon footprint until electric vehicles become the norm, and would fail to fulfil the policies in the local plan.***

An alternative scheme for the growth of Cam would start from the long-term potential of Cam and Dursley station and the main-line rail connections acting as a trigger to concentrated business development and associated services, with a coherent spatial plan for Cam working from the needs of the settlement, transforming it eventually into a twin town to Dursley, rather than a suburban extension.

Sharpness Vale

Given its location and the housing pressure in the Bristol area, the Sharpness Vale proposal would also be satisfying Bristol-linked demand to a significant degree, and in early years be very car-based. However, it does have two advantages over Wisloe Green: first, the developer's plan is exemplary - very carefully thought through, taking on board all the issues of sustainable development, and likely to create a good place to live; second, the pace of development and the eventual scale (11-12,000 people) is sufficient to support a range of local facilities, including in the longer run a secondary school. It would become a small town with the potential for most local trips to be by foot or pedal. It is not clear how it would relate to the neighbouring settlement of Berkeley. Its transport carbon footprint, given dependence for many jobs and higher level services on Gloucester and Bristol areas, will be influenced by the quality of rail and bus services available, so that is key to achieving the aspirations of the Local Plan.

■ 17/1/20