

21st July 2021

Local Plan Review
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Dear Sirs

STROUD LOCAL PLAN REVIEW: PRE-SUBMISSION DRAFT LOCAL PLAN FOR PUBLICATION - EXTENSION TO ASTON DOWN

This representation has been prepared by Ridge and Partners LLP in response to Stroud District Councils pre-submission draft Local Plan consultation on behalf of [REDACTED].

As per previous representations, the site adjoins the Key Employment Site at Aston Downs ("EK21"). The Land subject to this representation is known as Land to the North of Aston Down (hereby referred to as "the Site") and is located between Minchinhampton (Tier 2 settlement) and Chalford (Tier 3 settlement) within the open countryside and the Cotswolds Area of Outstanding Natural Beauty (AONB).

For context, a copy of the proposed site location plan can be found at **Appendix 1**.

Throughout the Local Plan process, we have submitted layers of information that supports the opinion that the Site is sustainable. Our previous representations were accompanied by a separate Transport representation which demonstrated that the site is in accessible and sustainable location. Previous representations can be found in **Appendix 2**.

Available

The site is within single ownership and is being promoted on behalf of the landowner. There are no legal or control issues which would preclude the land from development. It can, therefore, be considered available now.

Suitable

Alongside previously representations for this site, we wish to reiterate and maintain our view that the site is suitably located for employment development with good accessibility to local services, facilities and employment

opportunities via foot and other sustainable modes of transport. The site is adjacent to an existing employment site and allowing an extension to an existing business park would be representative of sustainable development.

The pre-submission plan seeks to maintain the delivery of strategic employment growth at Aston Down through the proposed reallocation of KES21. However, it is our concern that the LPA have ignored the opportunity to regenerate a brownfield site and diversify the District's employment base. In ignoring this opportunity, the Council have also limited the opportunity for existing businesses to expand; conflicting with Paragraph 81 of the NPPF (2021) which encourages planning policies to help create the conditions in which businesses can invest, expand and adapt. It states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. This approach has not been taken and consequently restricts existing buildings to build on their strengths, counter any weaknesses and address the challenges of the future.

The allocation of this Site is logical given that it is brownfield and adjacent to an existing local employment site. In terms of transport, it is well connected to the local and strategic highway network, can be provided with safe a suitable access and has access to sustainable travel modes which reduce the reliance on private car trips. Furthermore, there are no highways issues with access being achieved from Quat Goose Lane.

The provision of local bus services within walking distance of the Site provides a sustainable travel alternative to the private car for employees or visitors to the Site.

The site is located within the AONB which would require development to be sensitive towards its landscape. However, the site is seen in the backdrop of an existing business park, hindering the Site's relationship with the AONB. Nevertheless, the site is sizable providing ample opportunity for the inclusion of instruments to dramatically enhance its immediate landscape and provide social betterment. It is anticipated that the additional land could provide significant benefits that are available to the future occupiers and nearby residents at Minchinhampton and Chalford.

Deliverable

Despite not being proposed for an allocation in the pre-submission plan, Ridge and Partners remain resolute in their case that development of the site and the extension of a recognised and well-established key employment site at Aston Down would be representative of sustainable development. The Site could provide approximately 3.8ha of additional employment land to an already allocated 19.2ha allocated site.

Conclusion

The above assessment demonstrates that the site remains available, suitable and deliverable. It is found in a suitable location for sustainable development. It has been demonstrated that employment development is achievable with

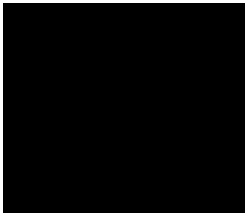
a realistic prospect of delivering quickly. The allocation and re-development of the Site would promote sustainable development by co-locating employment uses adjacent to an existing employment site which is served public transport.

Ridge and Partners LLP maintain the view that the 3.9ha site provides a logical, yet modest, opportunity boost to employment land supply. Equally, bringing forward the site will also provide social betterment for occupiers by integrating employment growth near to housing growth.

Significantly, allocating this would complement the continuation of the successful development strategy which remains highly effective, sustainable and in accordance with the Framework.

Please do not hesitate to contact me should you require further information or should you wish to discuss the site further.

Yours sincerely

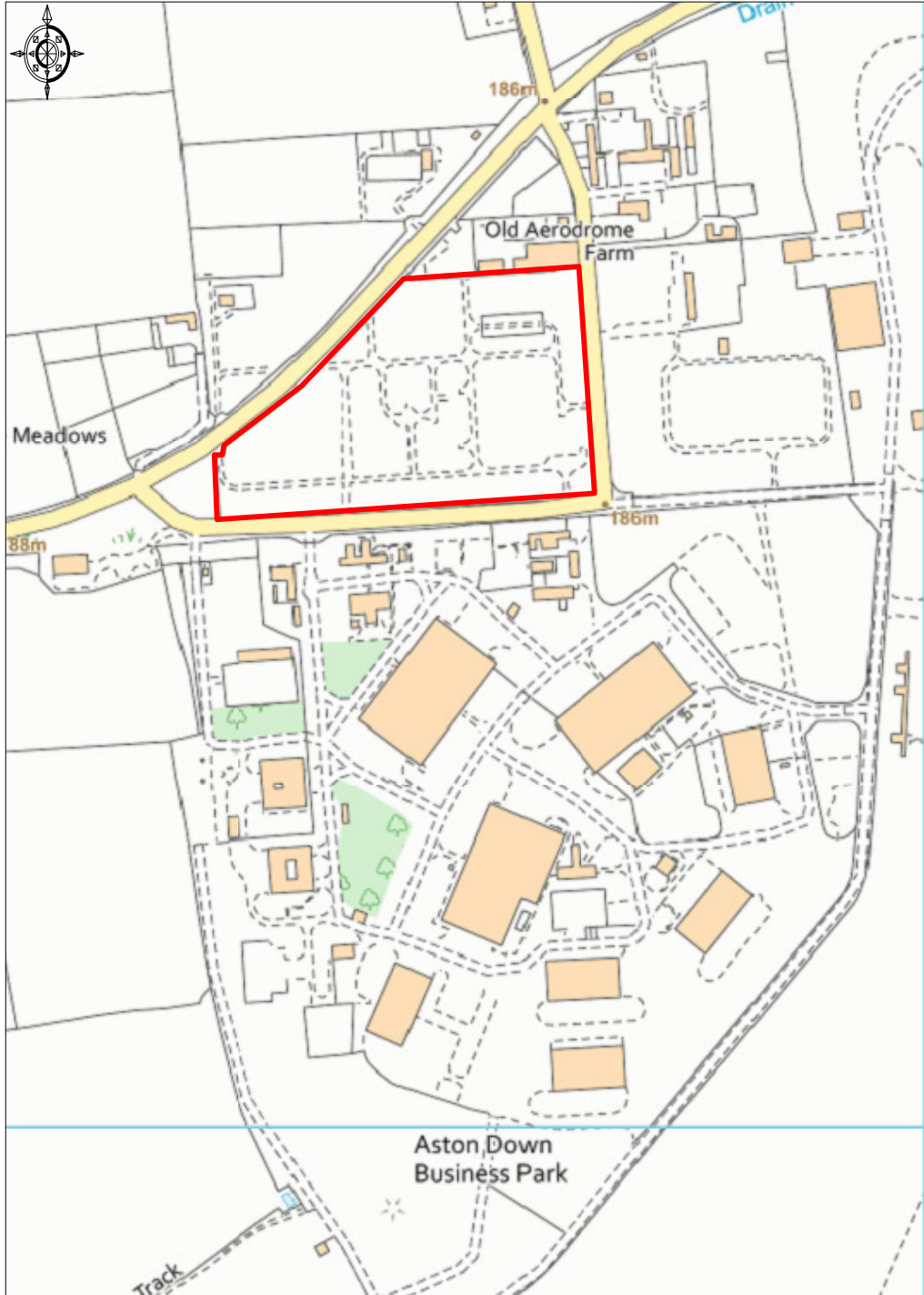


Planner
for Ridge and Partners LLP

APPENDIX 1

SITE LOCATION PLAN

Proposed new employment land allocation
Aston Downs, Minchinhampton



APPENDIX 2

SUBMITTED REPRESENTATIONS

22nd January 2020

Local Plan Review
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Dear Sirs

STROUD LOCAL PLAN REVIEW: EXTENSION TO ASTON DOWN

LAND NORTH OF ASTON DOWN

This representation has been prepared by Ridge and Partners LLP in response to Stroud District Councils Draft Local Plan consultation on behalf of [REDACTED].

Our representations are accompanied by separate Transport Representations which demonstrate that the site is in accessible and sustainable location.

The Land North of Aston Down (hereby referred to as "The Site") is located between Minchinhampton (Tier 2 settlement) and Chalford (Tier 3 settlement) within the open countryside. Immediately south of the Site is, key employment site ("KES"), EK21 Aston Down. In addition, the Site is within the Cotswolds Area of Outstanding Natural Beauty (AONB) - an area where development should be sensitive towards its landscape. Therefore, landscaping considerations would be given to the conservation and enhancement of the AONB whilst taking account of the biodiversity interest. The vision for the land is to propose a landscape buffer to help conserve and enhance the character of the AONB.

The Site appears to have been partially developed with visible access points, tracks and hardstanding as seen in Figure 1. There are no buildings present and the disused campsite has been abandoned. In the past, the Site was used for a local car boot sale, which utilised the hardstanding and surfaced access routes on site.



Figure 1 – Aerial image of the Site

The current boundary of KES EK21 is set out in Figure 2. As part of the Local Plan Review, it is recommended that this boundary is extended to accommodate the site in Figure 1.



Figure 2 – EK21 Aston Down

The Site could provide approximately 3.8ha of additional employment land to an already allocated 19.2ha allocated site. It has been noted that the Cotswold AONB Management Plan 2018-2023 does not rule out development within the AONB as long as it is compatible with conserving and enhancing its character.

The following businesses are considered to benefit from being in the AONB;

- Lifestyle businesses;
- Home working, small-scale rural office developments; and
- Knowledge-based businesses.

The Site would provide opportunity for these types of businesses to come to the area as the existing KES is currently not catering for such businesses.

Further, the Site has the capacity to provide parking provision to support employment uses and would result in the development of previously developed land. The accessibility via Cirencester Road (A435) would make this site attractive to potential occupiers.

Planning History

Planning permission was granted in February 1997 (LPA Ref.: S.96/1102) for a change of use from disused campsite to allow for the storage of topsoil. This application relates to a small proportion of the site under the site reference 17867 and establishes the land type as previously developed.

STROUD DISTRICT LOCAL PLAN REVIEW: DRAFT LOCAL PLAN

Stroud District Council are in process of reviewing the current Stroud District Local Plan. The District Council has approved a Draft Local Plan for the purposes of public consultation. On behalf of Mrs Priscilla Bayliss and Mrs Sarah Purkis, Ridge and Partners LLP submit the following representation with specific reference to:

- the draft development strategy,
- delivering Carbon Neutral by 2030,
- strategy growth and development locations,
- new employment development,
- key employment sites and development at existing employment sites in the countryside.

The Draft Development Strategy

The economic future of the District is set out in the proposed strategic objective SO2: Local economy and jobs, which 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”.

Ridge and Partners LLP support the proposed strategic objective and are of the opinion that the Site would contribute towards achieving this goal.

The draft employment strategy set out within the Draft Plan seeks to deliver economic growth and additional jobs on and adjacent to existing high value employment sites, with focus on regenerating large scale brownfield sites for employment. The Site is adjacent to KES EK21 and therefore would offer economic growth and additional jobs adjacent to an existing high value employment site.

Draft Core Policy 1: Delivering Carbon Neutral by 2030

Draft Core Policy 1 (‘DCP1’) introduces a new draft policy reflecting the Council’s commitment to become Carbon Neutral by 2030 ahead of the Government target of net Zero Carbon 2050. The policy sets the requirement to locate new development where the form and mix of development is in proximity to essential services and facilities to minimise the need to travel.

Ridge and Partners LLP broadly support the intention of the policy. However, this policy has a potential to significantly restrict rural employment opportunities in the District, contrary to paragraph 84 of the Framework. We believe that this policy has not been positively prepared, and the requirements are not justified. It has a potential to significantly impact the District’s ability to meet both housing and employment local needs.

A key aspect to adopting a carbon neutral strategy is to boost the resilience of homes, businesses and infrastructure. DCP1 would adversely impact the resilience of development proposals, especially rural employment sites, where private car use is favoured. We believe that the requirements proposed establish a sequential approach which would stifle the potential for employment growth in rural areas. It would further adversely impact on the sustainability of existing businesses in rural locations.

In addition, paragraph 2.50 of the Draft Plan recognises the Local Plan’s role in providing certainty to the business community to make long term investment decisions, while also providing the framework for creating an attractive environment including providing for a range and choice of sites and premises. However, the second requirement

set in DCP1 directly contradicts paragraph 2.50 and would discourage businesses, including businesses at EK21, to make long term investment decisions.

An extension to EK21 would encourage long term investment decisions by providing greater opportunities for current occupiers to expand and diversify the employment offer at this key employment location.

Draft Core Policy 2: Strategic Growth and Development Locations

The Draft Core Policy 2 ('DCP2') recognises a need to plan for between 2,300 - 6,300 net new jobs and provide at least 50 hectares of additional employment (use classes B1-B8) land (2020-2040).

Whilst Ridge and Partners LLP agree that there is a need for employment within the District, it is our opinion that additional employment land is identified within Minchinhampton Parish. The Employment Land Availability 2019 ('ELA') identifies that Minchinhampton Parish has lost 1.54ha of employment land on windfall sites; and further potential loss of 4.5ha on allocated sites was identified as at 1st April 2019.

Draft Core Policy 11: New Employment Development

Draft Core Policy 11 ('DCP11') relates primarily to the delivery of new employment development within the District. Proposed changes to this policy reflect locational requirements of different sectors. It is also acknowledged that rural business need cannot always be met in locations currently well served by public transport. The expansion of existing businesses and rural diversification is supported.

The draft policy also states that "*Permission will be granted for industrial or business development, or for the expansion or intensification of existing industrial or business uses, recognising the specific locational requirements of different sectors, provided that the proposals would:*

- 1. Be of a type and scale of activity that does not harm the character, appearance or environment of the site or its surroundings or to the amenity of occupiers of nearby properties*
- 2. Be readily accessible by public transport, wherever possible, and by bicycle and foot, or contribute towards provision of new sustainable transport infrastructure to serve the area, to make the development accessible by those modes*
- 3. Have a layout, access, parking, landscaping and facilities that are appropriate to the site and its surroundings.*
- 4. Use sustainable construction techniques and provide for renewable or low carbon energy sources in association with the proposed development*
- 5. Enable provision of infrastructure in ways consistent with cutting carbon dioxide emissions and adapting to changes in climate (including SuDS and green infrastructure)*
- 6. Demonstrate how the principles of industrial symbiosis have been considered".*

We support the intention of this draft policy. The extension of Aston Down key employment site would help provide greater opportunities and rural diversification. Furthermore, it would allow for the expansion space to accommodate current occupiers of EK21; for intensification of existing uses; and for introduction of new business uses to the site.

Draft Delivery Policy EI1: Key Employment Sites

Draft Delivery Policy EI1 enlists the key employment sites in the District which should be retained for B Class Uses, including EK21 Minchinhampton: Aston Down.

Ridge and Partners LLP strongly support the protection and development of employment site EK21 but suggest that the EK21's capacity and potential is increased by further extension which can be achieved through additional allocation of Land North of Aston Down.

Draft Delivery Policy EI4: Development at existing employment sites in the countryside

Draft Delivery Policy EI4 ('DDPE4') relates primarily to development at existing employment sites in the countryside. It details that *"the extension of existing buildings, site boundaries and the provision of new buildings, including infilling between existing buildings, will be acceptable providing that:*

- 1. The proposal facilitates the retention or growth of local employment opportunity*
- 2. The proposal would not cause an unacceptable visual impact on the local character in terms of its siting, scale, materials or site coverage*
- 3. There are no suitable alternative buildings or sites that can be used adjacent to the site or locality*
- 4. The proposal can avoid harm to local amenities and adjoining land uses, particularly where residential uses have been permitted on part of the site*
- 5. The proposal would not generate significant traffic movement and volume that would lead to unacceptable environmental impacts or detriment to road safety".*

Additional allocation of Land North of Aston Down would facilitate employment retention on the existing key employment site.

Further addition would not generate significant traffic movements or volume of traffic which would lead to unacceptable environmental impacts or would be detrimental to road safety. Our representations are accompanied by Transport Representations document concludes that the site is well connected to the local strategic highway network; is served by public transport and accessible through non-vehicular modes of transport.

SUSTAINABILITY

The sustainability of the Site has been assessed against the assumptions made in Appendix 1 of the Sustainability Appraisal (“SA”) report prepared by Land Use Consulting and published in August 2018. The assumptions have regard for the minor and significant effects for each SA objective.

SA Objectives	SA 1: Housing	SA 2: Health	SA 3: Social Inclusion	SA 4: Crime	SA 5: Vibrant Communities	SA 6: Services and facilities	SA 7: Biodiversity/geodiversity	SA 8: Landscapes/townscape	SA 9: Historic Environment	SA 10: Air quality	SA 11: Water quality	SA 12: Flooding	SA 13: Efficient Land Use	SA 14: Climate change	SA 15: Waste	SA 16: Employment	SA 17: Economic Growth
Land North of Aston Down	0	+	0	0	+	0	0?	--?	0	--?	--?	0	+	0	+?	+	+

Table 1: Sustainability Appraisal of the Site

It is found that the Site, much like all employment sites within the Draft Plan, has a negligible effect on the following objectives:

- SA 1: Housing;
- SA 3: Social Inclusion;
- SA 4: Crime;
- SA 6: Services and Facilities;
- SA 7: Biodiversity/geodiversity;
- SA 9: Historic Environment;
- SA 12: Flooding;
- SA 14: Climate Change.

In addition, it is found that the Site would have a positive effect on the following objectives:

- SA 2: Health;
- SA 5: Vibrant Communities;
- SA 13: Efficient Land Use;
- SA 15: Waste;

- SA 16: Employment;
- SA 17: Economic Growth.

Also, it is found that the Site could have negative effect on the following objectives:

- SA 8: Landscapes/Townscapes;
- SA 10: Air Quality;
- SA 11: Water Quality.

However, all negative aspects indicated within the sustainability appraisal can be appropriately mitigated. With regards to “SA 8: Landscapes/Townscapes”, the future development would seek to positively enhance the character and quality of the landscape, through appropriate the design of the built form and through emphasis on enhanced landscaping within the sit. We are of the opinion that significant enhancement of the landscape can be achieved.

The “SA 10: Air Quality” objective is judged upon sustainable transport modes and is also considered to be uncertain at the time of writing. A positive outcome regarding air quality would be achieved through the implementation of a travel plan which would be agreed during the future planning application stage. Due regard would be paid to any existing travel plans associated with the existing Aston Down key employment site.

As set out above, the Site has potential to significantly enhance the locality without inflicting a negative impact towards achieving social, economic and environmental objectives.

NEED FOR ADDITIONAL EMPLOYMENT LAND

As set out above, the draft policy DCP2 identifies a need for additional employment land of at least 50 ha within the plan period. The employment land identified in the Draft Local Plan is:

- Quedgeley East Extension: 5ha
- Javelin Park: 9ha
- Sharpness Docks: 7ha
- Sharpness: 10ha
- Stonehouse North West: 5ha
- Stonehouse Eco-Park (M5 J13): 10ha
- Wisloe: 5ha
- Renishaw New Mills: 10ha

The above sites collectively provide up to 61ha of employment land. However, we are of the opinion that additional sites should be identified to ensure sufficient flexibility of the Draft Local Plan and to ensure that the economic needs of the District are met.

Paragraph 2.56 of the Draft Plan recognises that the Stroud District is faced with a key issue relating to the number of people out-commuting to work. Therefore, access to jobs, services and facilities needs to be improved in the future. To counter the considerable challenge of out-commuting, the District needs to enable greater employment opportunities for the highly skilled and well qualified working population.

According to the ELA, which forms part of the Draft Local Plans evidence base, 6.5ha of employment land was lost at Site Allocation 1 ('SA1'), Stroud Valley. Additional potential losses of allocated employment land are identified and reach up to 9.3ha in Stroud District, of which 4.5ha could be lost in Minchinhampton Parish alone. This is highlighted as a concern within the ELA.

Such losses intensify the need to ensure that Minchinhampton's employment needs are met by allocating a further 3.8ha of employment land and extending the provision at Aston Down. We consider such addition to be essential to ensure a balanced community, where local job opportunities are provided, is maintained.

Allocating the Site would further cater for the District's changing employment trends and commuting imbalances, created by people travelling to towns and cities beyond the District for work. We believe this can be achieved by allocating the Site as an organic, and a logical extension to the existing and viable business location. In accordance with the paragraph 117 of the NPPF, allocating the Site, a previously developed land, actively promotes an effective use of land to meet the need for employment.

FUTURE GROWTH STRATEGY

As set out above, CP11 provides a clear recognition that the expansion of existing businesses and rural diversification is supported. The Local Plan highlights that, to stem out-commuting, Stroud will need to attract more knowledge-based industries alongside the capacity of employment sites to meet emerging opportunities within the green sector for clean growth and for supporting cyber-tech innovations.

SUMMARY AND CONCLUSION

Stroud District Council is reviewing its adopted Local Plan in accordance with paragraph 33 of the NPPF which requires policies in local plans and spatial development strategies to be reviewed at least once every five years. Such review should take into account changing circumstances affecting the area.

In this respect, we support the intention of the newly introduced policy DCP1, however we are of the opinion that its wording needs to be amended to prevent stifling of development in rural locations which generally suffer from lack of connectivity through alternative modes of transport. As such, we are of the opinion that in its current form the draft policy **DCP1 is not positively prepared** and **is ineffective** in supporting development in rural areas.

Furthermore, the introduction of sequential approach to prioritising modes of transport **is inconsistent** with national policy, particularly with paragraph 84 of the NPPF; and we find that wording of DCP1 is **not justified** within the evidence base provided.

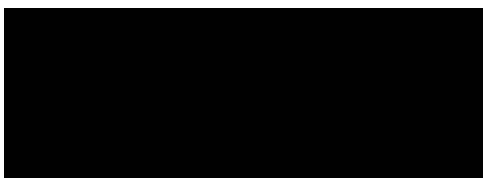
Contrary to requirements of paragraph 80 of the NPPF, there are further inconsistencies between draft policies DCP1 and DCP2 which restrict businesses who may want to invest, expand and adapt within the Stroud District. We believe that draft Local Plan needs to encourage further employment development to assure that local business and community needs in rural areas are satisfied.

In this respect we would like to put forward a site at Aston Down for employment land allocation, as this site forms a logical and organic extension of an existing key employment site in an area where provision of employment land is relatively limited. Further addition of employment land in this location would have positive impact towards achieving sustainability and overcoming out-commuting issues, and loss of employment land to alternative uses identified within Minchinhampton. Such allocation would also add greater flexibility to the Plan in case the delivery on other strategic employment site is delayed.

I trust that our comments will be taken into consideration during preparation of the submission version of the Stroud District Local Plan Review.

Please do not hesitate to contact me if you require any further information regarding the above.

Yours sincerely



Planner
For Ridge and Partners LLP



RIDGE

**STROUD DRAFT LOCAL PLAN – PROPOSED ALLOCATION
TRANSPORT REPRESENTATIONS**

January 2020

DRAFT LOCAL PLAN – PROPOSED ALLOCATION

21/01/2020

Prepared for

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CONTENTS

1. INTRODUCTION	4
1.1. Background	4
1.2. Site Location	4
1.3. Report Structure	5
2. PLANNING POLICY	6
2.2. National Planning Policy Framework – February 2019	6
2.3. Gloucestershire Local Transport Plan 4, 2015-2031	6
2.4. Stroud District Council Local Plan 2015-2031	7
3. EXISTING CONDITIONS AND ACCESS STRATEGY	9
3.1. Overview	9
3.2. Existing Highway Network	9
3.3. Public Transport – Bus	9
3.4. Public Transport – Train	10
3.5. Access by Walking	10
3.6. Access by Cycling	10
3.7. Proposed Access	12
3.8. Parking	12
4. SUMMARY AND CONCLUSION	13
4.1. Summary	13
4.2. Conclusions	13
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1. INTRODUCTION

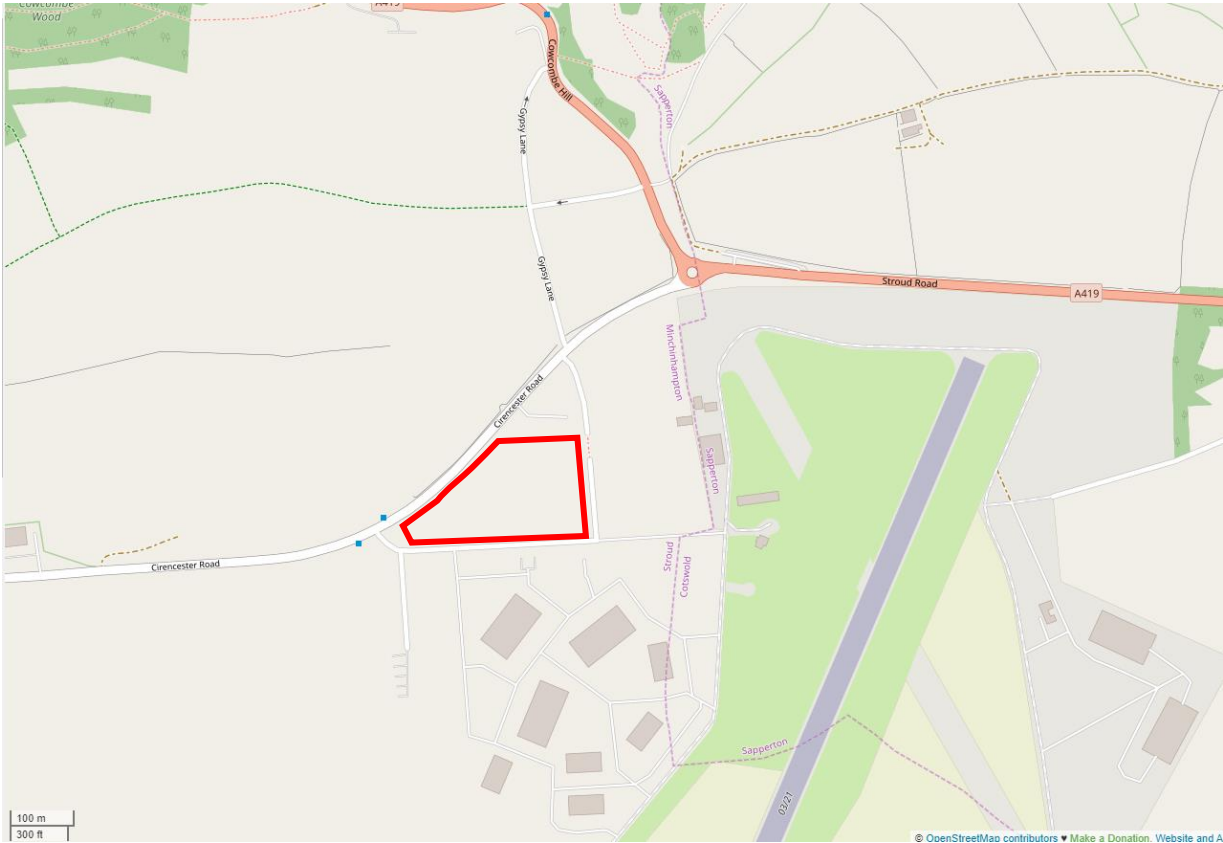
1.1. Background

- 1.1.1. Ridge & Partners LLP has been commissioned by [REDACTED], to provide transport planning consultancy services to support a proposed allocation on land adjacent Aston Down business park. This Site is not a proposed allocation in the Draft Local Plan (2019) but is presented as a logical extension to the existing business park to the south.
- 1.1.2. This Transport Representation should be read in conjunction with the Planning Representation also prepared by Ridge & Partners LLP.

1.2. Site Location

- 1.2.1. The Site is located to the south of Cirencester Road and to the north of the main access / Airfield Road into the Aston Down site from Cirencester Road. The Site sits in a triangle of land on the edge of the wider historic airfield site. It offers the opportunity for gateway development supporting the existing business park and employment uses already at Aston Down.
- 1.2.2. To the north the Site is bound by existing properties, to the east by the original alignment of Gypsy Lane to the Cirencester Road, to the south by the main access road (Airfield Road) into Aston Down airfield and to the west by Cirencester Road. The location of the site is illustrated below in Figure 1.

Figure 1: Site Location (Source: Open Street Map)



1.3. Report Structure

1.3.1. This Transport Representations Report prepared for the Site, considers the following:

- Chapter 2 provides a summary of the relevant policies from the NPPF (2019), Gloucestershire Local Transport Plan 4 (2015-2031) and Stroud District Council Local Plan (November 2015) in relation to the proposed re-development of the Site;
- Chapter 3 establishes the existing site context in terms of transport and considers a sustainable access strategy; and
- Chapter 4 presents a summary and conclusion in support of the site.

2. PLANNING POLICY

2.1.1. This section of the Representations Report considers Transport Planning Policy in relation to the Site.

2.2. National Planning Policy Framework – February 2019

2.2.1. The updated National Planning Policy Framework (NPPF) was published by the Department for Communities and Local Government in February 2019 to replace the NPPF published in March 2012.

2.2.2. The document states that Transport issues should be considered from the earliest stages of plan-making and development proposals so that the potential impacts of development on transport networks can be addressed;

- Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- Opportunities to promote walking, cycling and public transport use are identified and pursued;
- The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.

2.2.3. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

2.2.4. At a more detailed level, the NPPF states that developments should be located and designed in order to:

- Give priority to pedestrian and cycle movements and have access to high quality public transport facilities;
- Address the needs of people with disabilities and reduced mobility;
- Create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians.

2.2.5. A key tool to assist in facilitating all of the above will be through the provision of a Travel Plan. All developments which generate significant amounts of movement should be required to provide a Travel Plan.

2.3. Gloucestershire Local Transport Plan 4, 2015-2031

2.3.1. The Council's Local Transport Plan 4 (LTP) was formally adopted by the Council in 2016 and updated in 2017 to including the emerging work on the Joint Core Strategy. At the time of writing a review is underway to update LTP for a period up to 2041 and include recently produced Local Cycling and Walking Infrastructure Plans.

- 2.3.2. The current LTP (4) sets a plan for future transport of the county while supporting growth and economic viability while encouraging sustainable modes and a reduction in emissions. It is recognised that Gloucestershire is a geographical patchwork of travel corridors each with distinctive transport opportunities and pressures which are addressed through the six Connecting Places Strategies.
- 2.3.3. The main vision of the LTP is to provide: *'A resilient transport network that enables sustainable economic growth by providing door to door travel choices.'*
- 2.3.4. The relevant Connecting Places Strategies are CSP5 which covers Stroud at its centre and out along the A419 to Aston Down and CPS4 which covers the South Cotswolds around Cirencester. Within CSP6 most of the proposals focus on Stroud and the immediate vicinity but there are longer term proposals for highway improvements on the eastern section of the A419 towards Cirencester. Within CPS4 the focus is on Cirencester, but with the longer-term aim of improving access between Market Towns and reducing barriers of travel by all modes within and between centres. Within both CPS4 and CPS5 there are proposals to improve bus routes across the county.

2.4. Stroud District Council Local Plan 2015-2031

- 2.4.1. At the time of writing the adopted planning policy for Stroud District Council is the Stroud District Council Local Plan (2015-2031). There is an emerging Local Plan (2020-2040) which is currently open for public consultation. This Transport Representation is being made to the emerging plan but needs to consider the current transport policy within the adopted plan.
- 2.4.2. The Local Plan covers Transport in Chapter 5 – Economy and Infrastructure, with more detailed information such as car and cycle parking guidance in the Appendices.
- 2.4.3. One of the strategic objectives of the plan in Chapter 5 is SO4: Transport and Travel which specifies: *'Promoting healthier alternatives to the use of the private car and seeking to reduce CO2 emissions by using new technologies, active travel and / or smarter choices, working towards a more integrated transport system to improve access to local goods and services.'*
- 2.4.4. This transport approach aligns with planning policy CP11 to focus new employment development across the district to serve local need with priority to the expansion of existing employment sites. The requirement here is to ensure that the site can be accessed by public transport, bicycles and by foot to ensure that travel to the site is sustainable.
- 2.4.5. The approach to development from a transport perspective is set out further in Core Policy 13, which again focuses on alternatives to the private car, safe and suitable access and suitable site design picking up the core themes of the NPPF.
- 2.4.6. At a district level, promoting transport choice and accessibility is covered in policy E112, which focuses on connecting and improving existing infrastructure and enhancing accessibility. This policy also sets out the requirement at the planning stage for a Transport Assessment and Travel Plan.
- 2.4.7. Car and cycle parking guidance is set out in Appendix 2 of the Local Plan. The car parking standards set out for B classes uses are as follows:

- B1(a) & (b): Up to 1,000m²: 1 space per 25m² / Over 1,000m²: 1 space per 35m²
- B1(c) / B2: Up to 5000m²: 1 space per 50m² / Over 5,000m²: 1 space per 35m²
- B8: Up to 10,000m²: 1 space per 100m² / Over 10,000m²: 1 space per 200m²

2.4.8. Cycle parking standards are also set out in Appendix 2, as follows:

- B1(a) & (b): 1 space per 166m²
- B1(c) / B2: 1 per 330m²
- B8: 1 per 330m²

3. EXISTING CONDITIONS AND ACCESS STRATEGY

3.1. Overview

- 3.1.1. As set out above, this Transport Representation considers a brownfield site to the north of the current Aston Down business park between the main Airfield Road and Cirencester Road. This Site was historically part of the wider airfield site and was in MOD use prior to the current uses on site.
- 3.1.2. This section of the representations considers the existing highways network, sustainable travel options for accessing the site and the potential site accesses and access strategy.

3.2. Existing Highway Network

- 3.2.1. The Site is accessed from the existing main airfield and Aston Down business park access road which is subject to a 30mph speed limit.
- 3.2.2. The Airfield Road forms a junction with Cirencester Road to the west of the site. The Cirencester Road is subject to the national speed limit at this location, the priority-controlled T-junction is on the inside of bend with good visibility in both directions and provides safe and suitable access.
- 3.2.3. The Cirencester Road provides a connection to the west to Minchinhampton and to the A46 Bath Road via Culver Hill through Amberley. To the east Cirencester Road becomes the A419 at the junction with Cowcombe Hill. The A419 to the north links to Stroud via Chalford, while to the east the A419 connects to Cirencester before joining with the A417.
- 3.2.4. The site is well connected locally via the Cirencester Road and the A419. Further strategic highway connections are made to the A417 and A419 at Cirencester and south to the M4. The M5 can be accessed to the west of Stroud via the A419.

3.3. Public Transport – Bus

- 3.3.1. The closest bus stops to the Site are immediately adjacent the main airfield access junction on the Cirencester Road within 250 metres of the centre of the proposed allocation Site. These bus stops are unmarked but served by the 128, 861 and 869 local bus services.
- 3.3.2. The 128 service operates a Monday to Friday service between Nailsworth and Cirencester, providing one morning and one evening bus service in each direction. The service is operated by Cotswold Green.
- 3.3.3. The 861 service operates between North Nibley and Cirencester via Dursley, Tetbury and Avening. It provides a Monday to Friday service of one morning and one evening service in each direction. The service is operated by Stagecoach West.
- 3.3.4. The 869 service runs between Paganhill and Cirencester via Stroud, Rodborough Common, Amberley and Minchinhampton. It provides a Monday to Friday service of one morning and one evening service in each direction. This service is operated by Stagecoach West.

- 3.3.5. The provision of local bus services within walking distance of the Site provides a sustainable travel alternative to the private car for employees or visitors to the Site.

3.4. Public Transport – Train

- 3.4.1. The closest railway station to the proposed allocation site is Stroud Railway Station which is approximately 8.5km by road to the west of the Site.
- 3.4.2. The station is served by Great Western Railway services (Golden Valley Line), between Cheltenham, Gloucester and Swindon. These train services provide regional services with direct services available to London. Connections can also be made for services to Bristol, Birmingham and the south coast.
- 3.4.3. Stroud railway station has secure storage of 20 bicycles and car parking for 150 cars.
- 3.4.4. It should be noted that the Golden Valley Line runs less than 1km from the proposal Site and that the former Chalford Station would have been within 2.5 km of the Site. At the time of writing there are however no proposals to re-open this station to serve the local community.

3.5. Access by Walking

- 3.5.1. The Institution of Highways and Transport (IHT) guidance document 'Planning for Walking' (April 2015) states that 80% of journeys shorter than 1.6km are made wholly on foot. Furthermore, 26% of journeys that are 1.6km to 3.2km long area also undertaken on foot.
- 3.5.2. The National Travel Survey (NTS) (September 2016) identifies that walking is a favourable option for short trips, with the average person willing to walk for an average time of 18 minutes. Given the IHT guidance that pedestrians travel at a speed of 1.4m/s, pedestrians are therefore likely to walk to areas within approximately 1.5km of their origin. This puts the local bus stops identified on Cirencester Road within easy walking distance of the proposed allocation Site.
- 3.5.3. The NTS also identifies that 80% of all trips under 1.6km are made on foot, 31% for trips that are 1.6 to 3.2km in distance. These proportions are broadly similar to those put forward in the IHT 'Planning for Walking' document thereby verifying the results.
- 3.5.4. It should be noted that existing access road and local highway network do not have footways and that other than the existing business park and airfield close to the south of the proposed allocation there is not much within walking distance to the north of the site other than the bus stops on Cirencester Road.
- 3.5.5. If this Site is allocated, it could provide pedestrian improvements on the northern side of the Airfield Road which would improve pedestrian access to the existing business park, airfield and the bus stops on Cirencester Road.

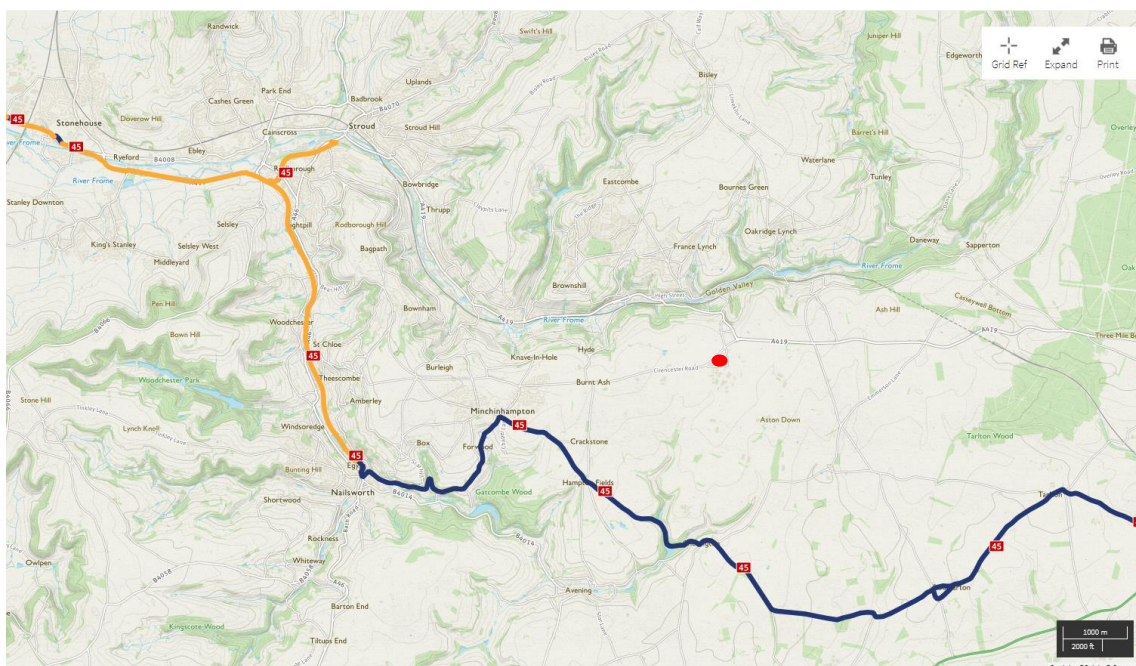
3.6. Access by Cycling

- 3.6.1. The Institution of Highways and Transport (IHT) guidance document 'Planning for Cycling' (October 2015) states the majority of cycling trips are for short distances, with 80% being less than 8km and with 40% being less than 3.2km. However, the majority of trips by all modes are also short

distances (67% are less than 8km, and 38% are less than 3.2km). The bicycle is therefore a potential mode for many of these trips.

- 3.6.2. The NTS 2016 identifies that cycling is a favourable option for short trips, with the average person willing to cycle for an average time of 24 minutes. Local Transport Note 2/08 'Cycle Infrastructure Design' (2008) states that cyclists usually want to be able to travel at speeds of 19kph, which is the average speed of a cyclist on a level surface.
- 3.6.3. It is therefore considered that 16kph is an appropriate average travel speed, given time spent negotiating road junctions, traffic etc. while cycling. It is therefore considered that the average person is willing to cycle an average of 6.4km (24 minutes).
- 3.6.4. The NTS 2016 identifies that 79% of all cycle trips are up to 8km in distance, which is broadly similar with the IHT recommendation that 80% of all cycle trips are less than 8km. It is therefore considered that since 6.4km is the average, it is reasonable to consider that some cyclists may cycle up to 8km.
- 3.6.5. 6km from the site would take you to Bisley to the north, to Coates to the east, to Avening to the south, to Minchinhampton and Nailsworth to the west and to the edge of Stroud to the northwest. It is worth noting that Stroud and Woodchester fall within an 8km cycle to the west, so are also accessible by bike for those willing to cycle up to 8km. Therefore, cycling offers the potential to substitute for short car trips locally.
- 3.6.6. In terms of local cycle routes, there are no segregated facilities close to the site and any cyclists would have to cycle on road. However, it is worth noting that National Cycle Route 45 runs to the south of the site at Cherington which provides an alternative route to Nailsworth, Woodchester and Stroud.

Figure 2: National Cycle Routes (Source: Sustrans).

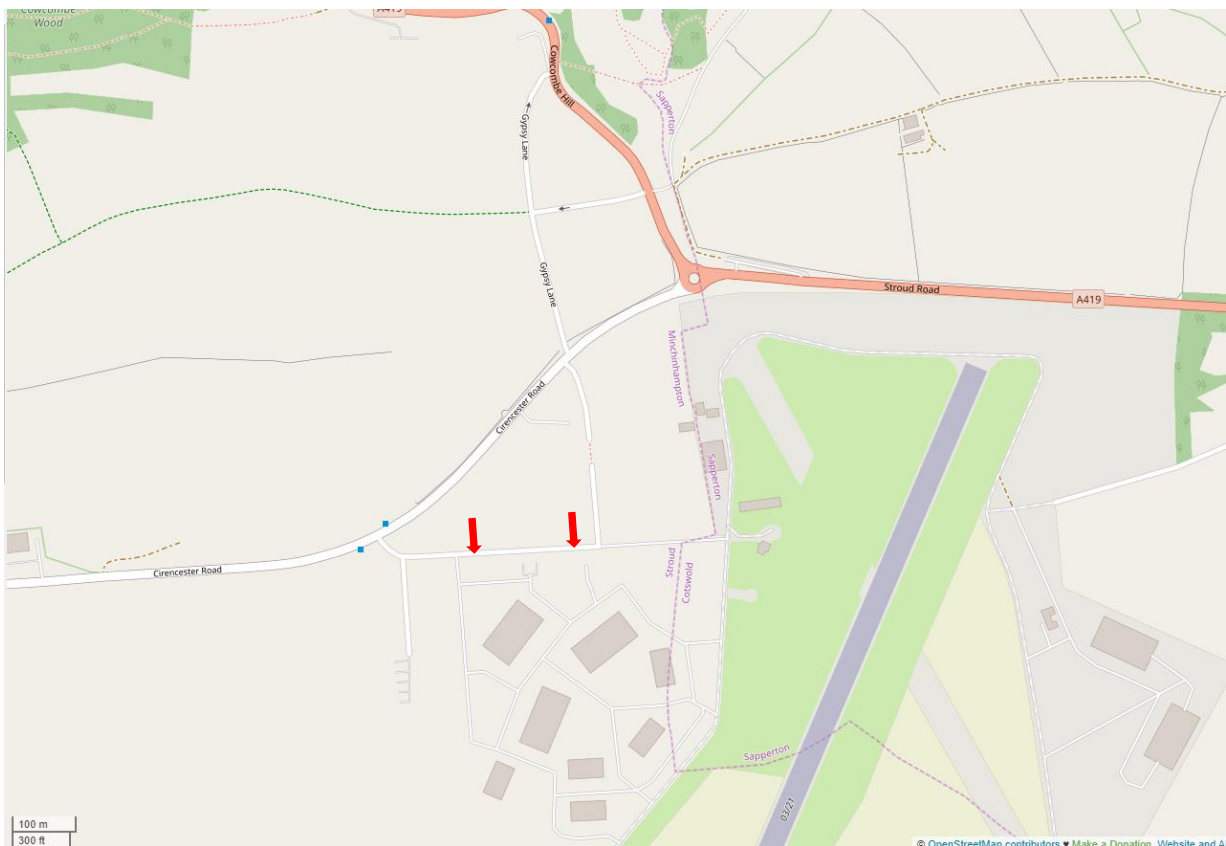


- 3.6.7. Figure 2 illustrates the context of the site to the local towns and villages and shows that cycling may be an attractive alternative to short car trips for users of the site who live within 6km to 8km.

3.7. Proposed Access

- 3.7.1. At this stage, it is proposed that access to the site would formalise one of the two existing field gate accesses on the Airfield Road. As detailed above the airfield access road provides a direct access onto the Cirencester Road.
- 3.7.2. Figure 3 below shows the location of the existing access in the context of the site.

Figure 3: Existing Access Locations (Source: Open Street Map)



- 3.7.3. An alternative option would be to provide a new access onto the Cirencester Road. This would be subject to further examination and review of a suitable location in terms of junction spacing against existing accesses and the provision of suitable visibility splays. An initial review indicates that access could be provided within the centre of the site frontage on Cirencester Road.
- 3.7.4. Pedestrian access into the site would be provided from the existing Airfield Road and Cirencester Road. Any proposals for the site would include a new footway to connect to bus stops on Cirencester Road to ensure a safe pedestrian route into the site.

3.8. Parking

- 3.8.1. Any car and cycle parking provision on the site would comply with the parking standards set out in the Stroud District Local Plan. This would include secure and covered cycle parking and if required electric vehicle charging points.

4. SUMMARY AND CONCLUSION

4.1. Summary

- 4.1.1. Ridge & Partners LLP has been commissioned by [REDACTED] to provide transport planning consultancy services to support the allocation of the proposal Site at Aston Down for employment use.
- 4.1.2. The allocation of this Site is logical given that it is brownfield and adjacent to an existing local employment site. In terms of transport, it is well connected to the local and strategic highway network, can be provided with safe a suitable access and has access to sustainable travel modes which reduce the reliance on private car trips.
- 4.1.3. Based upon the all relevant policy analysis the proposed allocation Site complies with core policies outlined within the NPPF, Gloucestershire Local Transport Plan and Stroud District Local Plan policies. The allocation and re-development of the Site would promote sustainable development by co-locating employment uses adjacent to an existing employment site which is served public transport.
- 4.1.4. The Site is in a sustainable location, adjacent to existing employment uses. It is located within walking distance of existing bus stops on Cirencester Road which are served by three bus routes serving the local towns and villages.
- 4.1.5. This document has also considered which towns and villages are within a 6km and 8km cycle of the proposed allocation and it is considered that cycling to the Site offers a viable alternative to short distance car trips. Cycle parking and changing facilities would be provided onsite as per local policy requirements.
- 4.1.6. Any development that comes forward on this Site would be supported by a detailed Transport Assessment and Travel Plan to ensure that it is acceptable in transport terms.

4.2. Conclusions

- 4.2.1. Given the review undertaken within this Transport Representation, it is considered that the proposed allocation is in a suitable and sustainable location from a transport perspective. It offers the opportunity to locate further employment locally close to an existing employment site and reuse a brownfield MOD site.
- 4.2.2. The site is accessible by public transport, being served by three local bus services and is within cycling distance of several local towns and villages which means that future employees and visitors have a sustainable alternative to short private car journeys.
- 4.2.3. It is therefore concluded, that in transport terms the allocation and re-development of this Site is acceptable in the context of the NPPF and local planning policy and there is no reason why the site should not be allocated for development.



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