

5th December 2017

Our ref: Stroud I&O/RN

Dear Sir/Madam

Stroud Local Plan Review - Issues and Options Paper 2017

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

Biodiversity

The key review areas listed for the Environment (18 to 26) are appropriate to consider as they may require modifications to the existing adopted Local Plan. Additionally across all themes there may be implications for the plan policy wording and supporting text of the UK's planned exit from the European Union in a few years time.

In respect of Question 1.0a & 1.0b all the environmental review areas are important and several of these are overlapping and interlinked. However considering the increase in the population predicted the plan will have an important role in assessing area 26 (strategies for protecting the natural environment from indirect effects on the natural environment). Providing sufficient green space within new developments plus accruing positive improvement to the natural environment beyond will be an increasingly important aspect of sustainable development. There is a cross-over here to Question 2.4a & 2.4b being posed by the Issues & Options Paper.

Question 4.1 – It is agreed that the main studies will include a refresh of the Habitats Regulations Assessment which will inform finalising any preferred options for modifying the adopted Local Plan. Also important will be a Sustainability Appraisal and the proposed Infrastructure Delivery Plan must include green infrastructure. All of these three studies will have quite a bit of interlinkage.

Archaeology Comments

We are supportive of the inclusion of key issue 21. It is important that protection of the historic environment in future plans is at least as strong as provided for by current plan policy ES10. We would be happy to provide up to date further information held by the HER where this would provide a strong evidence base for subsequent stages of plan preparation, once site options begin to be looked at in more detail.

Minerals and Waste Comments

No comments at this stage.

Transport Comments

Question 2.1a) what to you think are the biggest challenges facing the local economy in Gloucestershire for the future? How can we help to address these?

Maintaining and where possible enhancing physical and digital connectivity to internal and external markets will be essential to Gloucestershire's economy in the future. The key question for economic growth currently facing the Country is that of productivity.

An efficient transport system is a key driver to increase productivity and congestion, as and when it occurs, acts as an economic dis-benefit due to its negative impact on productivity. Every minute spent in traffic congestion is time that could otherwise be spent achieving productive outputs. For Stroud District this is an issue when accessing the strategic road network at M5 junctions 12, 13 and 14 and within the A419 corridor through Stonehouse and Stroud.

That said much of the transport network within the District is operating within capacity, but to avoid the impact of congestion at network pinch-points investment will be required to maintain long-term network resilience and productivity.

There are four key areas of transport connectivity which need to be understood within Stroud's updated transport evidence base they include:

- Understanding existing travel demand
- Understanding planned and future travel demand
- Understanding gaps in planned transport investment
- Prioritising connectivity investment

A further consideration in that of the county's demographics especially its ageing population. In time this will impact the economy in terms of productivity and will require increased revenue support from the local authority to maintain quality of life standards. In terms of transport an ageing population will require a greater level of support in terms of public / community transport schemes which will have an ongoing resource implication if subsidies are required to provide public transport access.

Question 2.1c) do you think locating growth adjacent to M5 junctions should be supported; or would continuing expansion of employment land at existing settlements/sites be preferable?

In terms of transport it depends on the location, the performance of the existing transport network and the affordability of increasing capacity within the network. A review of network performance should also be undertaken to identify likely pinch points and high level mitigation schemes to reduce the risk of transport investment delaying the deliverability of development sites.

There are pros and cons regarding the arguments for urban extensions and focussed delivery around transport hubs. Urban extensions facilitate the expansion of existing sites due to the shorter distances to link development sites to existing transport network and/or services. Please note the intentional change from the highway focussed question to a more sustainable transport hub concept.

Growth adjacent to the M5 highway would facilitate highway access to longer distance locations, but these would be typically made by single occupancy car and result in the need for ongoing investment to address highway capacity. This would inevitably result in a very expensive mitigation strategy. Subject to funding being available to increase the capacity of the M5 mainline through possible smart motorway operation and an increase in capacity at M5 junctions, there is a logic to locate certain employment sites within the vicinity of junctions to minimise strategic vehicle movements from the local network. It should be noted that those employees accessing the sites will also need to travel and these journeys are likely to be made by car, due to the limited public transport options available. Any proposals for growth in and around the M5 would need to be discussed with Highways England who manages the Strategic Road Network.

An alternative would be to explore the option of focussing residential development around transport hubs, such as railway stations (new and existing) or bus stops which are served by high frequency routes (i.e. a service operating at least every 20 minutes throughout the day) which would aid sustainable travel. Should the focus on railway stations be considered, a preference in terms of linkages to local employment centres would be those stations located on the Bristol to Birmingham mainline to facilitate travel to Cheltenham, Gloucester and the West of England. Access to nation and local cycle links should also be a consideration when determining the suitability of a site in terms of sustainable travel patterns and enhancing permeability through development sites and to transport hubs should be prioritised.

Question 2.1e) should the Local plan look to promote further homeworking, encourage development of live-work units and co working facilities?

Improvements to digital connectivity should be integral to the local plan. This would not only facilitate home working, but also service delivery as the scope of technology improves during the local plan period.

Homeworking and co working are likely to reduce work related trips typically undertaken during peak travel times (Monday to Friday 7:30 to 9:30 and 16:00 to 18:00). It is likely that demand for travel will not reduce overall as a result of increased homeworking as work related trips may switch to leisure based trips (to the gym or retail) during home working days. It is also likely these would occur at different times of the day. It is therefore likely that demand for travel will increase throughout the day instead of being focussed on the typical AM and PM peaks.

The Lifetime Homes initiative should be promoted in the local plan. Lifetime Homes are ordinary homes designed to incorporate 16 design criteria that can be universally applied to new homes at minimal cost. Each design feature adds to the comfort and convenience of the home and supports the changing needs of individuals and families at different stages of life.

<http://www.lifetimehomes.org.uk/pages/lifetime-homes.html>

The impact of technology on transport service delivery and infrastructure requirements is not fully understood in terms of how it will affect travel patterns. However, commuting distances may increase with people living further away from their employment base as regular commuter trips will be required on fewer days of the week. It is likely to assume that this longer distance commuting pattern may increase within Gloucestershire due to the benefits afforded by the high quality of environment on offer.

Question 2.2) do you agree with the options set out for improving our town centres?

Improved signage to assist motorists finding car parking has a positive affect on both air quality and congestion by reducing the number of vehicles driving around looking for spaces. Better signage for cyclists

and pedestrians is also very worthwhile, especially when promoting the viability of these modes of travel – for example, identifying travel times on foot or by bike.

Capacity constraints on the A419 corridor and M5 junctions should be considered when marketing towns for their proximity to the A38/M5 corridor.

In addition we cite the following issues with the accessibility of town centre in Stroud district:

- The lack of long-term parking to support business and leisure activity
- Merrywalks is a barrier to pedestrian and cycle movements in Stroud Town Centre
- Narrow street pattern within Stroud town centre results in transport conflicts
- Network resilience during adverse weather events or when M5 is closed
- Inadequate bus and rail services to Bristol, Cheltenham and Gloucester
- Limited transport links to Wotton-under-Edge
- Lack of bus timetable information
- Limited active travel routes linking communities
- Timing and reliability of bus/train connections

Question 3.1) How should we meet future development needs?

<p>Option 1: Continue to concentrate housing and employment development at a few large sites located adjacent to the main towns in the district</p>	<ul style="list-style-type: none"> • Focusing development to a few large sites adjacent to the main towns does facilitate the extension to existing transport services (e.g. bus and cycle) and it is often more affordable to extend existing transport infrastructure than building new. • Urban extensions often reduce travel distances to existing services and there is the potential for a greater uptake of sustainable travel use. • However, this does not always result in affordable solutions being identified and existing travel demand must be managed to accommodate sufficient capacity for new development and compromise if often required. <ul style="list-style-type: none"> ○ There may be existing capacity constraints on the highway network that will require mitigation ○ Existing bus services may be non-commercial and the scale of new growth may not justify a commercial service being viable. ○ Cycle permeability may be restricted unless this is considered at the outset of planning the sites • Should mitigation schemes be required to address the cumulative impacts of development it is important for the transport strategy to be incorporated into local policy to aid fully inform the phasing and use of developer contributions required to offset the impacts of future growth. • It is also worth noting that growth adjacent to Gloucester fringe development would likely require new local transport hubs and services due to the distance from the City centre. There are limited options in terms of access to rail connectivity unless new stations were considered as part of any mitigation strategy. Adopted LTP policy LTP PD5.1 Rail Infrastructure Improvements sets out the policy for potential new stations in Stroud.
<p>Option 2: Take a more dispersed approach with some medium sized housing and</p>	<ul style="list-style-type: none"> • Distribution shares the impact of growth across the District • The cumulative impact will be less within the immediate vicinity of development, but existing pinch-points are likely to get worse and there would be an increase of several smaller transport pinch points across the

employment sites on the edge of the larger villages, as well as towns	<p>district</p> <ul style="list-style-type: none"> • Broader distribution is unlikely to provide sufficient growth to finance commercially viable public transport services • Development would likely be car reliant • A likely funding gap would occur due to the dispersed development approach resulting in a failure to generate the critical mass of third party funding required to finance likely transport mitigation
Option 3: Disperse development across the district with most villages including at least one small to medium site allocated to meet local needs	<ul style="list-style-type: none"> • Very unsustainable in transport terms with limited ability to collect contributions towards transport • Only those on an existing financially viable Public Transport service routes are likely to have access to such travel choices • Will be reliant on car and community focussed schemes
Option 4: Identify a growth point in the district to include significant growth, either as an expansion of an existing settlement, or to create a new settlement	<ul style="list-style-type: none"> • One Supplementary Planning Document should be produced to manage transport requirements and provide a phased delivery plan managing the pooling of contributions and funding requirements • Development could be designed around transport needs from the outset. This provides the opportunity to have cycle facilities and Public Transport services in from the start of occupation • Public Transport subsidies may be required to kick-start any new service, but with the risk that they may not become financially viable until later in the build programme due to development phasing. Therefore, development may be reliant on public subsidy for longer. This is likely to be at the cost of other services as budget restrictions are ongoing • Transport investment will only support new development with no added benefits to other communities across the District.

Question 3.2a) should Gloucester's fringe be considered for development?

The importance of accessibility must be imbedded into new development from the outset and if Gloucester's fringe were to be developed, public transport rail opportunities, access for those with the protected characteristics, greenways (such as the Stroudwater canal) and sustainable travel choices, such as bus travel for those unable to afford private vehicles must all be considered.

It is also important to identify the socioeconomic group that developments will be targeting so that the right travel options are available. Additional background studies will be required to inform location proposals, taking into account any possible air quality issues, the location of transport infrastructure and development of new greenways.

For example, transport links to Gloucester city or Cheltenham, which are some distance from the southern fringe, will not be financially viable if shoppers and commuters are traveling to Cribbs Causeway and Bristol. However, education, health and food retailers may be required locally and will need good crosscutting links to encourage active sustainable travel choices. Adopted LTP Policy PD5.1 Rail Infrastructure Improvements sets out the County Council policy on possible new stations between Gloucester and Bristol (see below).

Question 3.3a) are there opportunities to improve transport links between areas within Stroud District and South Gloucestershire, Bristol and beyond?

Data from the 2011 Census indicates that there are over 5,000 daily work trips from Stroud District to the West of England. There are several opportunities to improve transport connectivity to the West of England including better highway (upgrade of M5 J14) and rail access (MetroWest).

Gloucestershire County Council is working with the West of England Combined Authorities (WoECA) to extend proposed services from Yate up to Gloucester as part of their MetroWest Phase 2 proposals. This would create a half hourly service between Bristol and Gloucester stopping at Cam and Dursley. This would improve connectivity for residents in Stroud District travelling north as well as south to the wider Bristol area and beyond.

This ongoing work is also looking at potential new rail stations between Gloucester and Bristol at Hunts Grove (HG) and Stonehouse Bristol Road (SBR) within Stroud District and Charfield in South Gloucestershire. The sites at HG and SBR should remain safeguarded until the ongoing studies demonstrate which, if any, of the stations are viable from both an operational and economic perspective.

The existing stations at Stonehouse, Stroud and Cam & Dursley provide sustainable transport opportunities and one of the key issues is to improve facilities at the stations in terms of access, ticketing, toilets, refreshments, parking etc. New development in the district will increase station usage which has already grown considerably over the past decade.

GCC continues to work with other stakeholders to improve experiences for people travelling by rail. SDC should include a policy encouraging station improvement and safeguard land where possible so future rail related improvements can be made. Cam & Dursley station is particularly important as it is the only station in the district to provide a direct link with Bristol. The existing car park is already oversubscribed, with cars parked on the road and this will be exacerbated by additional development in the surrounding area. The emerging local plan should identify a suitable site for additional parking, in conjunction with other stakeholders, for safeguarding.

With regard to Stroud station the emerging Local Plan should provide a supportive context for improvements to Stroud station as set out in the masterplan currently being worked up. The station occupies a key position in the town centre and has the potential to improve pedestrian access in the area by improving linkages across the railway. The station also has the potential to fulfil a community function which would increase activity at times when the station isn't staffed. These measures are likely to result in an increase in passengers travelling to and from Stroud and environs.

Question 3.3c) do you consider that there is more potential for further growth at Sharpness/Newtown?

There is significant potential for future sustainable growth at Sharpness / Newtown to function as a self contained settlement. However, due to the its limited transport provision in the area a full transport review would be required to identify the necessary significant transport infrastructure requirements and identify the scale of development necessary to enable delivery through third party funding. For example the scale of development should be to a quantum to support a commercial public transport service. If insufficient development is planned and the necessary transport infrastructure not delivered this would remain an unsustainable location reliant on the car for access.

Question 3.3d) are there specific community needs arising from Berkeley, Wanswell and Brookend that could be met at Sharpness/Newtown; and what safeguards could be put in place?

Parking, road safety and traffic management are known issues raised by local communities in connection to transport in the area.

Question 3.4) do you agree with the settlement hierarchy?

Yes, the settlement hierarchy is supported..

Question 3.5a) How should development proposals on the edges of our towns and villages be managed?

It is important to provide a robust transport evidence base through the Local Plan process to provide information on transport connectivity within Stroud District. Issues to understand include:

- Understanding existing travel demand
- Understanding planned and future travel demand
- Understanding gaps in planned transport investment
- Prioritising connectivity investment

Once this is understood, it will inform the production of transport mitigation strategy including delivery phasing. This will help manage the delivery of development proposals for edges of towns and villages.

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

Yours faithfully



Planning Officer