

STROUD TOWN COUNCIL RESPONSE TO LOCAL PLAN REVIEW – DRAFT PLAN FOR CONSULTATION AUTUMN 2019

The following table refers to the [Draft Plan for Consultation](#) November 2019

Page	Paragraph	Item	Question/comment
12	1.30	Acknowledges poor public transport	
14	1.33	Carbon neutral is top priority	
15	1.33	Sets proportion of affordable homes in urban/rural areas	Are the numbers of dwellings appropriate?
17	1.33 Priority 18	Emphasis on limiting car use	
17	1.33 Priority 23	Energy efficiency vs traditional character and local distinctiveness	Very hard to reconcile and there is nothing in the policies that covers this.
17	1.33 Priority 32	“ensuring public open spaces are adaptable and capable of accommodating multiple uses”	How?
18	Text about Rush photo	Assumes relocation to Stratford Park is a done deal.	Is this appropriate, given that planning permission has not even been sought yet? There is no allocation in the plan for this development.
19	1.33 Priority 35	Health and wellbeing – “well designed and insulated homes”	How will “well designed and insulated” be defined?
22	Vision to 2040	Tourism is identified as a key industry.	How are SDC going to support this (other than in planning terms)?
23	SO1	Accessible communities	Affordable and accessible housing for local needs required.
24	SO5	Zero carbon development	How will this be defined and enforced? See p179
28	2.23	Public realm improvements in Stroud; local walking and cycling routes	How and where? There is no specific policy covering how this will be achieved and funded in Stroud.
28	2.25	Improved access to Cam and Dursley station	How will this benefit residents in the 5 Valleys?
29	2.28	Assumes a need to improve key network junctions on M5, A419 and A38, whether or not development goes ahead.	What assessment has been done of the potential for pre-emptive introduction of better public transport and walking/cycling facilities? Does not support Priority 18 (page 17).

Page	Paragraph	Item	Question/comment
29	2.29	New station at Stonehouse	Which is the best location for a new station on the Bristol/ Birmingham line? Or are both proposed?
112	G2	New railway halt at Whaddon	What impact would it have on road traffic?
32	2.43	Need for extra care homes identified	GCC say fewer are needed! What does the evidence say? Are any particular sites identified for this?
34	2.51	"The Draft Plan also seeks to enable young people to be able to stay within rural neighbourhoods..."	GFirst LEP have identified a significant issue relating to keeping young people in the County. This is not just a rural issue. How specifically will the LP help mitigate this?
35		"additional affordable homes working with parish councils, co-operatives, community land trusts and community housing groups"	What support will be made available to these groups to purchase land and develop it? How realistic is this without financial and practical support?
35		"minimum development sizes, subject to evidence of need, to avoid town cramming"	How big? What evidence? What does cramming mean? Which policy achieves this?
35		Proportion of affordable housing is different for urban and rural sites.	How are urban and rural defined?
35		Housing mix depends on "identified local needs"	How will local needs be identified?
35		Design guidance for 'lifetime homes'	What does this mean? Needs a definition.
35		Plan aims to deliver: <ul style="list-style-type: none"> • self/custom build • older people • gypsies/travellers • local people 	But there are no specific site allocations for this.


Page	Paragraph	Item	Question/comment
38	2.59	Co-location of employment/housing	How will the Plan ensure that the jobs match the houses to reduce commuting? (expensive houses need well paid jobs and vice versa)
40	2.65	“clawback convenience goods capacity which is currently being lost to other settlements (including Stroud)”	Evidence?
40	2.66	Refer to “evolution of the high street”	What is SDC’s strategy for supporting this evolution? What will it evolve into?
40		Future of Town Centre Report	<p>Disappointing that this dated and highly subjective report is still being referred to as evidence. It needs urgent updating with more robust independent research.</p> <p>If a retail threshold is going to be set, SDC need to reassess Stroud needs.</p> <p>Cheapside and Church Street car parks could be more imaginative by adding housing on a deck above – a modern take on Alms housing for local people.</p>
42		“integrated transport hub” in Stroud	<p>Needs much more detailed research, but could form part of review of NDP.</p> <p>It would good to have proper cycle track commitment.</p>

Page	Paragraph	Item	Question/comment
44		Refers to <u>“Open Space, Green Infrastructure (GI), Sport and Recreation Study”</u> .	<p>States that:</p> <p>“A minimum of four additional 3G FTPs (Football Turf Pitches) are required in the Stroud Study area to meet training requirements now and up to six to meet demand to 2040. A priority is to provide a 3G FTP in Stroud – Archway School or Marling School are potential sites.”</p> <p>However, there is a former rugby pitch at Marling which is allocated for housing development! In the current LP this land is designated as Protected Outdoor Play Space. With regard to rugby:</p> <p>“any expansion at Cainscross RFC may also require additional pitch space. The most pragmatic solution is to try to obtain pitches at schools with community use agreements although there are none nearby to the former two clubs.”</p> <p>The unused rugby pitch at Marling is very close to Cainscross RFC!</p>
44		Refers to <u>“Open Space, Green Infrastructure (GI), Sport and Recreation Study”</u> .	<p>There is also a requirement for “Stroud Hockey Club to be able to meet all its training and matchplay needs and to have a separate clubhouse facility at Stratford Park Leisure Centre”. How would this be accommodated, especially if the skate park goes ahead?</p> <p>No mention of relocation of skate park in the study, although it is acknowledged that the current site is unsuitable.</p>
47	DCP1	Requires developers to achieve “highest viable” energy efficiency	Developers will inevitably argue the case unless a defined standard is mandatory.
54	Core policy CP5	Sustainability objectives (A to G)	See p181
59		Focus on “strategic conservation and regeneration” of Stroud and Dursley town centres?	How?

Page	Paragraph	Item	Question/comment
60	SALA		See attached extract of Stroud sites that have gone through the SALA process. See p.74 below.
61-80	The Stroud Valleys		Each settlement has its own section and vision, but there are no sections for Cainscross and Rodborough, which are lumped in with Stroud. Neither has any allocated development. Maintaining and improving the vitality of Stroud town centre, including 'managing' the night time economy should be changed to 'enabling' or 'supporting' the night time economy.
61			Walking and cycling should be added to the priorities.
62	Draft Vision		Walking and cycling should be added to the vision. (as a normal way of getting around, not just for leisure)
64-65		Development strategy and site allocations for Brimscombe and Thrupp	-"-
66		Development strategy for Chalford	-"-

Page	Paragraph	Item	Question/comment
74-77		Development strategy and site allocations for Stroud	<p>Does not mention NDP!</p> <p>The following NDP sites were ruled out in SALA process:</p> <ul style="list-style-type: none"> • Merrywalks (beyond shopping centre) • Beeches Green • Fromeside <p>But there is no explanation as to why the Market Tavern is not included.</p> <p>Good that SDC are planning to do detailed development briefs for the sites that are allocated in Stroud – we are already working on this for the NDP review. We should offer to collaborate.</p> <p>Where NDP sites are included the areas don't always marry up:</p> <ul style="list-style-type: none"> • Bowls Club – does not come all the way down to the A46 • Railway land/Cheapside – excludes station forecourt, Brunel Mall and London Road Car Park • Police station – small corner of site on Ryeleaze omitted. Why? • Canal basin – included in allocation PS13 (page 77) which also includes whole of WSP textiles site and former Marling rugby pitch. Whole allocation is in the IHCA.
75		Changes to SDL	See Appendix A for proposed changes to settlement boundary to include Bowbridge Wharf and Margaret Hills Close
150	New policy DCP2		Support for older people is welcome

Page	Paragraph	Item	Question/comment
151		Housing needs to be assessed at cluster level	Is there potential for this to be done at parish level where suitable evidence is available? There is a definite need to carry out continuous housing assessment need – STC have already commissioned one for Stroud to support the by NDP review which can be offered as evidence.
151	CP8 – 2	New housing development – accessibility	Welcome support for walking and cycling
151	CP8 – 4	New housing development - construction	See p181
151	CP8 – 5	New housing development – biodiversity	Remove “where appropriate”
154	4.12	Self-build and custom build	Welcome support for this.
154	4.14	DHC3 – new policy Live-work development	Welcome support for this.
157	HC5	Replacement dwellings	Why does this only apply to heritage buildings? Missing “not”?
157	HC6 – 1		Suggest addition of cycle storage
158	HC8 – 3		Suggest addition of cycle storage
159	DHC5	Wellbeing and health	Welcome support for this.
159	DHC6	Protection of existing open spaces...	The allocation of the rugby pitch at Marling is directly contrary to this policy. (See page 44 above.)
160	DHC7	New Delivery policy	This is very welcome. Could it be extended to include provision of cemeteries? There is a significant deficit in the district.
164	CP11 - 6	Industrial symbiosis	Very welcome, but needs a clear definition of what this means.
165	CP12	A - Stroud	When was the Primary Shopping Area last reviewed? Is it still appropriate?
166	CP13	Demand management and sustainable travel measures	Too vehicle oriented – needs to prioritise public transport and active travel over cars. Should require contributions to infrastructure to support this. ii) include cycle parking

Page	Paragraph	Item	Question/comment
167	Key employment sites	EK31 Fromeside EK32 Salmon Springs EK33 New Mills/Libby's Drive	<p>Are there any sites missing? Only part of Fromeside is allocated as a Key Employment Site.</p>  <p>Should the whole site be included? Or would it be more appropriate for the whole to be included as a "Regenerating Existing Employment Site"?</p>
168	Regenerating Existing Employment Site	ER8 Stafford Mills Industrial Estate ER9 Lodgemore & Fromehall Mills	Are there any sites missing?
170	EI7 Non-retail uses in primary frontages	Limits changes within use class A	<p>When were the frontages last reviewed? Are they still appropriate?</p> <p>Is there any scope for restricting the proliferation of take-aways?</p>
170	EI8 Non-retail uses in secondary frontages	Limits changes within use class A	<p>When were the frontages last reviewed? Are they still appropriate?</p> <p>Is there any scope for restricting the proliferation of take-aways?</p>
171	EI19 Delivery policy	Retail floorspace threshold (gross) – Principal Town Centre - Stroud	We would like the threshold reduced to 750 sq m

Page	Paragraph	Item	Question/comment
172-173	EI12 Promoting transport choice and accessibility	Sustainability by design – “Development should be located in areas which are already well served by public transport and have access to a range of local facilities within walking and cycling distance.”	Not acceptable – we should be planning for development that improves or creates new public transport and walking/cycling facilities. Not just cannibalising existing services/facilities which are already inadequate. ¹
172-173	EI12 Promoting transport choice and accessibility	Delivering transport infrastructure contributions “where reasonable and viable”	Too much wriggle room. If the infrastructure is not there developers must be required to provide it or build somewhere else!
173	Parking standards	Cycle/vehicle	See Appendix 3 for standards. See p208 below.
173	DEI1	District-wide mode-specific strategies	Very welcome but does not consider the impact of delivery vehicles. Missed opportunity to tackle issues relating to local parcel and goods deliveries.
174	EI14	Provision and protection of rail stations and hubs	See 29 above.
175	EI16	Provision of public transport facilities	And pay for shelters and seating – including contribution to ongoing maintenance?
179	CP14	High quality sustainable development	Define “high quality” in terms of sustainable construction. “12. It is not prejudicial to the development of a larger area in a comprehensive manner” – what does this mean?

¹ Recent example – the Stroud to Dursley bus route has been changed to accommodate the new development west of Stonehouse. The journey now takes 1.5 hours!

Page	Paragraph	Item	Question/comment
181	ES1	Sustainable construction and design	<p>How robust is this? Will developers be able to argue viability? Is offsetting really sustainable?</p> <p>We object to the references to percentages attached to the building regulations as a measure of sustainable design. It is unclear how SDC would measure and value the level of offsetting that they would propose be charged on less energy efficient buildings. How many years, what charging scale etc? Instead we want energy efficiency in new builds and renovations to aim for passivhaus or energy efficiency (EPC) A which we think are values that can more easily be understood.</p> <p>Good to see charging points required.</p>
181	ES10	Valuing our historic environment and assets	Need to make hard decision on how to resolve decarbonising Listed Building applications. Properties should meet at least A plus standard. Suggest look at best practice on Historic England website.
182	ES2	Renewable or low carbon energy generation	Good that suitable areas have been specifically identified. Hard to tell if any are in Stroud.
183	DES3	Heat supply	Good that potential for communal heating systems is recognised.
188	ES10	Valuing our historic environment and assets	Missed opportunity to provide for exemption for improving carbon footprint?
189	ES11	Maintaining, restoring and regenerating the District's canals	Good that CIL/s106 is anticipated for "contributions towards the improvement or restoration of the related canal and towpaths". But is the policy robust enough?
189	ES12	Better design of places	Define "better"!
190	DES2	Green infrastructure	Good that scope of green infrastructure is now wider.
190	ES16	Public art contributions	We welcome this.
194	7.12	Monitoring framework	How will carbon neutrality be monitored?

Page	Paragraph	Item	Question/comment
208-209	Appendix C	Parking standards	<p><u>Vehicle parking</u> 2 - new text relating to oversupply.</p> <p><u>Ultra low emissions vehicles</u> Covers both new development and retrofitting</p> <p><u>Cycle parking</u> Welcome additional requirements to provide private storage and either provide or fund public cycle stands, plus showers and lockers at significant developments.</p>
210	Table A	Minimum standards	Is there a typo? Heading refers to “cycle and motorcycle parking”, but the table says “car parking”