
RE: FW: Stonehouse Neighbourhood Development Plan

1 message

NIBLETT, Robert <Robert.NIBLETT@gloucestershire.gov.uk>

30 March 2016 at 10:25

To: Rachel Russell <stonehousenp@gmail.com>

Cc: "EXCELL, Simon" <Simon.EXCELL@gloucestershire.gov.uk>, "EDWARDS, Claire" <Claire.EDWARDS@gloucestershire.gov.uk>, "WATTS, Ben" <Ben.Watts@gloucestershire.gov.uk>, "SHIBLI, Emma" <Emma.SHIBLI@gloucestershire.gov.uk>

Hello Rachel

Thank you for giving Gloucestershire County Council (GCC) the opportunity to comment on an early draft of the Stonehouse Neighbourhood Development Plan (NDP). I have the following officer level comments to make.

Archaeology Comments

The NDP team may wish to assess the draft documents in the light of the Historic England Good Practice Advice note available at <https://content.historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/gpa1.pdf>, particularly paragraphs 28-32.

It is rare for neighbourhood plans to include a specific policy for the historic environment, in which case the district level local plan policies apply (specifically here, Stroud Local Plan 2015 Delivery Policy ES10). Nevertheless the Vision for Stonehouse includes the goal of protecting and enhancing the heritage assets of Stonehouse and the draft list includes policies covering the Stroudwater Canal Corridor (EM6) and Heritage Assets (ENV9), all of which are supported. It would be useful if any published evidence base included a list of designated heritage assets and referred to the Gloucestershire Historic Environment Record as the source of information regarding undesignated assets.

Flood Risk

The Lead Local Flood Authority will fulfil its statutory duty to provide advice to the Local Planning Authority when requested to do so regarding the management of surface water relating to major planning applications with the aim of ensuring related flood risk is managed as effectively as possible."

Ecology[SEA/HRA Screening advice for the Neighbourhood Plan](#)

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Looking at biodiversity alone as a theme the need for a Strategic Environmental Assessment (SEA) of the draft consultation version of the NDP appears unlikely. Our conclusion is also that a Habitats Regulations Assessment

(HRA) is not required for the NDP but this should be compared with the views of Stroud District Council and Natural England.

GCC Ecology Observations on the NDP Content

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The vision (includes 'environment –green space & recreation) and resulting policies promote the conservation and achievement of a net gain for biodiversity which is welcomed. The proposals have some consistency with the Local Nature Partnership's Strategic Framework for Green Infrastructure and the presence/close proximity of 'Frome Valley' Strategic Nature Area from the Gloucestershire Nature Map could also perhaps be referenced /warrants some consideration and is recommended – further details are to be found at <http://gloucestershirebiodiversity.net/index.php> .

Proposed Policy EM6 (Stroudwater Canal & Heritage Corridor) is appropriate and provides a mechanism to help protect and enhance the corridor for local biodiversity. Policy EM7 (Connectivity & Infrastructure) provides additional support for nature conservation. Policy ENV 1 (Local Green Space) is an important one for an area with much built development and important green infrastructure that is well used by people and wildlife. In defining the local green space in the policy text the following aspects of the Stonehouse area that could be taken into account are as follows:

Frome Valley Key Wildlife Site (KWS), Stonehouse Newt Pond KWS, Bond's Mill Bank KWS, Verney Meadows KWS

Frome Valley Strategic Nature Area (SNA)

Chipman's Platt - Newtown Conservation Road Verge (under review)

Further details on the KWSs plus notable species and habitats are available from Gloucestershire Centre for Environmental Records at <http://www.gcer.co.uk/> .The SNA above is part of the Gloucestershire Nature Map which can be seen at <http://gloucestershirebiodiversity.net/actionplan/imap.php> .

Policy ENV7 is the overarching policy which rightly highlights the importance of protecting and improving existing blue and green infrastructure in the Stonehouse area (and indeed surrounding areas including the Cotswolds AONB and Severn Vale). Policy ENV6 specifically covers 'Maintaining & Protecting the Natural Environment' and is consistent with the NPPF and Stroud Local Plan.

There are no compelling reasons to recommend any change to the wording of these biodiversity related NDP policies which seem to fit in with District and County objectives.

Comments on the proposed Transport (Traffic Management and Parking) policies.

It may be useful for the Town Council to align the Traffic Management and Parking policies with the County Council Local Transport Plan and to identify opportunities to fund and secure enhanced connectivity and transport investment through development proposals affecting the area around Stonehouse and the associated transport corridors

Policy T1: Loss of parking capacity

The adequate provision of public vehicle parking is one of the determinants of town centre viability. However, accessibility by all transport users can be a more important one. Over-provision of public car parking can undermine other mode shift policies. Car parking is 'invisible' transport infrastructure in that, whilst it obviously affects car use and access, it also affects levels of walking, cycling and public transport use. Therefore it may be more appropriate to state that 'equivalent' or 'increased capacity is provided elsewhere' where there is demonstrable need and to request an evidence base to that effect.

Policy T2: Parking in New Development

Agree

Policy T3: HGV Traffic

The LTP (to be adopted this summer 2016) seeks to pilot a 'Quiet Delivery Scheme' and a 'Last Mile Scheme' see

LTP PD 3.5 Managing domestic deliveries in urban or other sensitive locations

To minimise the impact of domestic deliveries in urban or other sensitive locations and of wasted delivery miles due to failed deliveries GCC will encourage local communities, Chamber of Commerce, Town and Parish Councils to consider the role of freight within their Neighbourhood or Town Centre Plans.

GCC will do this by implementing the following policy proposals:

- *To provide specific advisory guidance for local communities to consider the development of Last Mile Delivery Policy and route identification as part of the Neighbourhood/Local Plans process.*
- *To provide specific advisory guidance for the development of voluntary Quiet Delivery Service scheme as part of the Neighbourhood/Local Plans process.*

Stonehouse Neighbourhood Development Plan may want to develop a freight policy in this context, or to note that the County Council is seeking

to progress this initiative once LTP is formally adopted.

Policy T4: Pedestrian Routes

Sentence 1 should be within the context of the Gloucestershire Rights of Way and Countryside Access Improvement Plan.

Sentence 2 may be more effective if it refers to improved accessibility. Existing walking routes are important but they are only part of the picture in sustaining

and increasing levels of walking. As new development and increased transport demand affects the Stonehouse area and its transport corridor, the increased

permeability within new development layouts, connectivity between existing and new land uses, and the provision of new walking routes will be of great

importance. Walking trip numbers and lengths are a product of factors such as directness, coherence, sense of safety, surfacing, proximity to traffic, natural

surveillance etc. as well as sometimes offering a time and distance advantage over the car.

Sentence 3 this sentence appears to cloud the previous two. Is it referring to public rights of way or to footways within streets? Is it possible to clarify the

intention of this policy. Would it help to tie it into a general requirement for 'non-motorised access' or 'green infrastructure' with definitions of what those

would constitute?

Policy T5 Cotswold Way Loop

Is this a tourism economy policy? Are there any other linkages that should be listed here which strengthen key walk routes in direct support of the economy

(work/ school etc) and indirectly (long distance walks or walk routes of local importance) ?

Policy T6: New Development and Pedestrian Links to the Town Centre

A key rationale for locating a development near to transport connections and other land uses – such as schools and shops – is so that more people can walk for

more of their trips or for more parts of their trip.

Therefore, there should be a very strong support for pedestrian routes, not only 'where the location of the proposal suggests a need for such routes'. Existing

and new pedestrian routes should closely express pedestrian desire lines. The design and layout of new development should be fine grain and allow for

optimal levels of pedestrian permeability. New development should connect well to existing land uses. New development can create new opportunities for

more walk trips due to unlocking land and enhancing connectivity where it may not have previously existed.

These routes should ... add iii) so that 'MfGS' has a numbered point of its own.

Policy T7: Design of Pedestrian and Cycle Routes

Delete or clarify 'and viable'

Add point iii) for wildlife corridors

It will be important to tighten up the definition of the routes. For example cyclists are legitimate highway users with traffic. Some cyclists sometimes prefer to

use traffic free segregated facilities. This policy is talking about 'multi user trails. These could constitute green infrastructure and often make high quality wildlife

corridors. However, they aren't all pedestrian and cycle routes but they could be traffic free multi user paths which can contribute to mode shift, quality of life,

leisure and recreation, wildlife value etc.

Policy T8: Proximity of New Development to Facilities and Services

- i) Advise remove 'a 10 mile/ 800m' and just leave walking distance. Walking distances are different for school children as opposed to adults for example, and strongly affected by route directness and ambience.

Policy T10: Existing Cycle Routes

Refer to existing cycle routes such as Sustrans NCN r. 45. But then note that most cycle routes may not be identified – or else cyclists may be making a range of trip route choices in the way that motorists do – and often with motorists. This policy is confusing and needs re-working. It borrows from pedestrian and rights of way sections. Cyclists are not pedestrians although they sometimes valued shared use and traffic free facilities. The cycle route network needs to be identified before it can be protected or improved. Cycle routes may or may not also provide motor scooter accessibility; and, although cycle routes tend to be better for wildlife because their impacts are less than those of motorised traffic, the cycle routes themselves may be able to offer no more towards wildlife corridors than any other part of the highway.

Policy T11: New Development and Cycle Links to the Town Centre

There needs to more reference to connectivity to the wider area, not just Stonehouse town centre, particularly in the light of significant development proposals affecting west of Stroud.

This policy is referring to multi use tracks not cycle links. May benefit from reference to LTP Cycling Strategy.

Policy T12: Cycle Parking

The policy should not address the replacement of cycle parking. Cycle parking is provided in a different way to car parking and is more space efficient and more thinly distributed. Remove 'provision of additional' and, instead, refer to the provision of appropriate levels and locations of cycle parking (Sheffield stands) within and around the town.

Policy T13: Improving key pedestrian and cycle links

Add in the need to link to surrounding areas and to new development, including NCN 45, Stroud, Eastington, Nailsworth and any other locally important aspiration.

Policy T14: Improving access to and along the Canal

(add the full name of the canal – Gloucester & Sharpness Canal Towpath)

Propose amend to say '... to develop the canal as a navigable waterway and its towpath as a corridor for pedestrians, mobility scooters and cyclists ~~and boaters~~

Public Transport

It may be worth including a policy supporting the reopening of the railway station at Stonehouse Bristol Rd in the NDP. Once the NDP is adopted the policy will have added weight as part of the Development Plan and as such will lend support to any proposals/bids for the reopening of Stonehouse Bristol Rd as set out in the Objectives for getting around. It will be additional proof of local support for the project.

Policy T.9 Railway Stations is supported.

If you would like to discuss any of the officer level comments raised above please do not hesitate to contact me. I look forward to being kept informed of future developments regarding this matter.

Rob Niblett

Planning Officer

From: Rachel Russell [mailto:stonehousenp@gmail.com]
Sent: 29 February 2016 10:45
To: NIBLETT, Robert
Cc: Carol Kambites
Subject: Re: FW: Stonehouse Neighbourhood Development Plan

Dear Rob,

Stonehouse Neighbourhood Plan Group are currently working on finalising draft policies and aim to have a draft Neighbourhood Plan ready by the end of March. It would be very helpful to have your comments by mid March if at all possible; otherwise at the end of March would also be useful.

Regards

On 29 February 2016 at 10:38, NIBLETT, Robert <Robert.NIBLETT@gloucestershire.gov.uk> wrote:

Hello Rachel

Thank you for sending this through to GCC. Do you have a particular deadline in mind for comments from us?

I will coordinate comments internally and send them over to you.

Cheers

Rob Niblett

Planning Over

From: Rachel Russell [mailto:stonehousenp@gmail.com]
Sent: 26 February 2016 11:01
To: Local Transport Plan
Cc: ckambites@btinternet.com
Subject: Stonehouse Neighbourhood Development Plan

Dear Mr Watts,

Please find attached a letter regarding the Stonehouse Neighbourhood Development Plan together with attachments on the Plan's Vision and objectives, an overview of the Plan at February 2016 and a set of draft policies. I also attach a map showing key transport features provided by Stroud District Council.

Stonehouse Neighbourhood Plan Working Group would welcome your comments and advice, particularly on the draft transport policies,

Regards

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Rachel

Rachel Russell
Committee Clerk (Regeneration and Environment)
Stonehouse Town Council

01453 822070

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