

## **9. TRANSPORT**

### **9.1 GENERAL OBJECTIONS TO TRANSPORT CHAPTER**

#### **The Objections**

Tran/397/1328	Stroud District Task Force
Tran/388/1254	David Cheffings
Tran/424/1686	Stroud & Gloucestershire Green Party
Tran/424/1695	Stroud & Gloucestershire Green Party
Tran/424/1696	Stroud & Gloucestershire Green Party
Tran/397/1325	Stroud District Task Force
Tran/397/1326	Stroud District Task Force
Tran/1/0134-CW	Gloucestershire County Council

#### **Summary of Objections**

- (a) Road proposals may have archaeological implications
- (b) No provision to promote a motorway junction for Cam/Dursley
- (c) No targets for accessible and appropriate public transport service
- (d) Reduced parking standards or Home Zones could be explored further
- (e) Scope to develop strategy for network of pedestrian and cycle routes
- (f) Should consider impact of new housing on car journeys
- (g) Omission of Policy to create home zones or safe routes around schools

#### **Inspector's Reasoning and Conclusions**

9.1.1 Archaeological Sites of Local Importance are dealt with in the Built Environment Chapter at paragraphs 7.6.5 and 7.6.6. Road proposals would fall within the overall description of development and I see no particular reason to mention roads here.

9.1.2 The Structure Plan at Policy T10, which sets out the strategic road schemes for the plan period, does not include the provision of a new motorway junction for Cam and Dursley, because of the proximity of the Thornbury junction. I, therefore, consider it would be unrealistic to include it in a local plan.

9.1.3 Under national guidance in Planning Policy Guidance Note 12 – Development Plans – relating to transport policies, specific transport policies that directly involve the development or use of land should appear as a policy or a proposal in the Plan. It would also be appropriate to include proposals which have implications for the transport network and the management of traffic. However, targets for an accessible and appropriate transport service would be a matter for the Local Transport Plan which, at present, is co-ordinated on a county wide basis by the County Council.

9.1.4 The Council has now introduced a new policy for Home Zones into the Revised Deposit Plan at Policy T5A. I have commented on the wording of that policy. Although at the time of writing this report there is no clear definition of Home Zones in this country, I believe

the publication of a document is imminent and I see no reason why the Council should not adopt a policy which gives priority to pedestrians and cyclists and where traffic speeds are low. This would be in accordance with national guidance in Planning Policy Guidance Note 3 – Housing – to place the needs of people before ease of traffic movement in designing the layout of residential developments.

9.1.5 On the basis of current national guidance the plan has been revised to ensure that all parking standards are maximum. With maximum standards the Council has the flexibility to allow for significantly lower levels of off-street parking provision for developments in locations, such as town centres, where services are readily accessible by walking, cycling or public transport. It is clear from paragraph 9.13.1 that the Council will be encouraging non-car modes of transport in appropriate locations.

9.1.6 I accept that a strategy for a comprehensive network for cycle routes and footpaths is necessary. However, following advice in Planning Policy Guidance Note 13, these are matters which form part of the Local Transport Plan (and its appendices), which at present is prepared by the County Council to ensure a comprehensive approach to cycling and walking. Policies in the local plan complement this process by safeguarding existing or proposed routes and providing extensions to them. Policies T3 and T4, as revised, provide such controls and amended Policy R8 safeguards canal tow paths. The Proposals Map is to be revised to correct errors.

9.1.7 In my view Section 9.6 of the Transport Chapter of the Plan recognises the importance of integrating transport and land use planning. Policy T1, as revised, emphasises the need to locate development in locations highly accessible by public transport. Guidance in Planning Policy Guidance Note 3 advises on the creation of sustainable patterns of development which exploit and deliver accessibility by public transport. The objector considers that plans should demonstrate how the policies in the plan would help to curtail car movements. Monitoring of policies and allocations is now an integral part of the plan process. This monitoring should demonstrate the success or failure of policies and allocations. Whether specific allocations would curtail car movements will be considered elsewhere in this plan, particularly in the Housing, Employment and Town Centres and Retailing Chapters.

9.1.8 A policy on Home Zones has now been introduced. See Policy 5A. Although such zones could be an integral part of a new residential development, whether they would be appropriate around schools would depend on the location of the schools. The Council would need to look at the implications for a neighbourhood as part of a traffic management study to assess whether a Home Zone, or some other method of traffic calming, would be more appropriate.

#### **RECOMMENDATION 9.1**

Make no modifications to the Plan in response to these objections.

## 9.2 PARAGRAPH 9.2

### The Objections

Tran/para. 9.2./1/0147-CW	Gloucestershire County Council
Tran/para. 9.2./2/0170	Ebley Coach Services
Tran/para. 9.2./11/0182-CW	Stroud Cycle Campaign
Tran/para. 9.2.0./298/0795	CTC Right to Ride Network
Tran/para. 9.2.0./410/1442-CW	CPRE - Berkeley Vale

### Summary of Objections

- (a) Requires set of objectives and targets to increase public transport
- (b) Safe highway use for cyclists should be encouraged
- (c) A reduction in growth and absolute reductions in road traffic is confused
- (d) Need for more public information about alternative modes of transport
- (e) Need for increased perceived safety for walking and cycling
- (f) Allocate land close to Stroud town centre for transport providers
- (g) Objective 6 should give equal weight to encouraging walking and cycling
- (h) Uses in Objective 4 should be well served by public transport
- (i) Paragraph 9.2 should be reworded to reduce the overall length of journeys

### Inspector's Reasoning and Conclusions

9.2.1 Any setting of targets to increase public transport would form part of the Local Transport Plan prepared on a county wide basis. The objectives in paragraph 9.2 and the policies, as revised, emphasise the need for alternative modes of transport to the private car.

9.2.2 The promotion of safe highway use by cyclists would be a matter for the Local Transport Plan. This would be complemented by Policy T3 in respect of new development.

9.2.3 The Council has accepted the view, which I share, that the amended wording suggested by the objector would be more in line with advice in Planning Policy Guidance Note 13 and that it would also be appropriate to include an objective relating to pedestrian access. Information and public awareness of various modes of public transport, cycling and walking and their safety is a matter for the Local Transport Plan, together with its appendices, prepared on a county wide basis by the County Council.

9.2.4 There are often conflicting demands for land within town centres. As long as adequate provision is made for the dropping off and picking up of passengers, a bus transport depot, of itself, does not need to be located within a town centre. A full replacement facility would be likely to take up land which could be used to provide for more a compatible central area use. However, if, for example, a particular transport operator primarily serves Stroud Town Centre, then it seems to me that to locate a depot well outside the town on a site which would involve excessive non-operational mileage would not be sustainable. The Council should then consider whether an allocation is necessary within the town, but not in the town centre. I am not sure that I understand the objector's argument about paying premium rates for expensive land. Even if a site were allocated in the town for a bus depot, it would still have a particular market value.

9.2.5 It seems to me that Objective 6, as amended, and Policy T1, as amended, now adequately emphasise the importance of walking, cycling and public transport and as such reflect advice in Planning Policy Guidance Note13.

9.2.6 The Council would use Objective 4 to negotiate improved access to proposed development sites generating large numbers of people movements. The objector is also concerned that cycling and walking are not mentioned in Objective 4. However, Objective 3 requires all development proposals to provide for alternative means of transport to the private car, at an appropriate scale,

9.2.7 The Council has reworded paragraph 9.2.0 in the Revised Deposit draft. This is now more in accord with national guidance.

### **RECOMMENDATION 9.2**

Make no modification to the Plan in response to these objections.

## **9.3 PARAGRAPH 9.4.1**

### **The Objections**

Tran/para. 9.4.1./298/0796 CTC Right to Ride Network

### **Summary of Objections**

(a) Wish to see greater use of public transport, walking and cycling.

### **Inspector's Reasoning and Conclusions**

9.3.1 In my view this emphasis is already reflected in the objectives and policies in the plan, as revised. The policies of the plan would control the location of the various land uses to help reduce the need for travel, and provide for access by public transport, walking and cycling.

### **RECOMMENDATION 9.2**

Make no modifications to the Plan in response to this objection.

## 9.4 PARAGRAPH 9.5

### The Objections

Tran/para.9.5/397/1324            Stroud District Task Force  
Tran/para. 9.5.1./1/0166-CW    Gloucestershire County Council

### Summary of Objections

- (a) Integration of Plan with Local Transport Plan is unclear
- (b) Title of document is the Gloucestershire Local Transport Plan

### Inspector's Reasoning and Conclusions

9.4.1            The Transport Chapter includes those local transport issues which have land use implications in accordance with advice in Planning Policy Guidance Note 12. Only proposals that have a direct involvement of land use should be included. In the revised Deposit draft, paragraph 9.5.1 has been amended to emphasise this: in view of my recommendations when dealing with the Strategy Chapter of the Plan, it would be appropriate to set out in paragraph 9.5.1 a clarification of the relationship between this Local Plan and the Local Transport Plan. Paragraph 9.5.3 has been amended to mention some of the key targets in the Local Transport Plan.

9.4.2            Paragraph 9.5.1 has been revised to take the full title into account. This objection has been conditionally withdrawn.

### RECOMMENDATION 9.4

Modifications Paragraph 9.5.1 as indicated in paragraph 9.4.1 above.

## 9.5 POLICY T1

### The Objections

T01/11/0184	Stroud Cycle Campaign
T01/315/0911	Bloor Homes
T01/444/1953	Various Clients of Andrew Watton
T01/578/2532	The House Builders Federation
T01/577/2517-CW	NHS Executive South West
T01/543/2300	Government Office for the South West
T01/565/3833	Slough Estates plc
T01/1/3036	Gloucestershire County Council
T01/413/1491	Barratt Bristol Ltd
T01/106/0323	AONB Protection Group

T01/59/0254	Woodchester AONB Group
T01/409/1420	Buchanan Partnership
T01/444/3680	Various Clients of Andrew Watton
01/308/3201	Ministry of Agriculture Fisheries and Food (MAFF)
T01/413/1473	Barratt Bristol Ltd
T01/296/0771	Persimmon Homes (Wessex) Ltd
T01/408/1369	Hardwicke Court Estate

### Summary of Objections

- (a) Criterion 3 should require secure cycle parking and covered bus stops with seats
- (b) Extra traffic should not be generated by developments
- (c) Criteria 1 and 5 may prevent appropriate development in rural areas
- (d) Criterion 5 may not always be relevant
- (e) No definition of satisfactorily
- (f) Unclear whether policy can minimise need to travel and encourage alternative modes to the car
- (g) Policy is not matched by other Policies in the Plan
- (h) Criterion 6 may be at odds with PPGs3 and 13 in terms of relaxing parking standards
- (i) Ambiguity exists in provision of transport measures
- (j) Policy should provide clear locational guidance in respect of transport considerations
- (k) Delete Criterion 6, parking standards do not form part of the Plan
- (l) "Highly" in criterion 1 is ambiguous and contrary to other parts of Plan
- (m) Policy should be more positively worded
- (n) Criterion 5 does not accord with Circular 1/97
- (o) Large in Paragraph 9.6.4 should be defined
- (p) Delete Bullet 6 of Paragraph 9.6.5

### Inspector's Reasoning and Conclusions

9.5.1 In my view Policies T5 and T7 make adequate provision for secure cycle parking. Criterion 3 has been amended to encourage walking, cycling and use of public transport. Bus shelters with seats are covered in Policy T6.

9.5.2 I do not consider that it would be realistic to state that no extra traffic should be generated by a proposed development. Policy T1 of the Structure Plan merely requires new development to be located so as to *minimise the length and number* of motorised journeys, and does not state that extra traffic must not be generated. I consider that Policy T1, as revised, reasonably reflects the Structure Plan.

9.5.3 Criterion 6 has been revised to require appropriate levels of parking having regard to the Council's Parking Standards which have now been included in the plan. As maximum standards are adopted in accordance with national guidance there is built in flexibility not to require compliance with the maximum. The supporting text gives examples of situations where full standards would not be expected.

9.5.4 Criterion 5, as revised, merely requires the Council to consider the need to provide

for highway improvements. If there were no such needs the Council would not require them.

9.5.5 In the context of the wording of Policy T1 I do not consider the word “satisfactorily” needs to be defined in any detail. It seems to me that if the Council does not consider a proposal would meet the requirements of Policy T1 then the development could be refused.

9.5.6 I find the wording of Policy T1, as revised, to be sufficiently detailed to make it clear the criteria the Council would expect to be met prior to granting planning permission for development. Policy T1 is supplemented by other policies dealing with particular aspects of transport and traffic.

9.5.7 As revised I find the criteria in Policy T1 reasonable to encourage sustainable development. I have dealt with objections to the settlement strategy and the allocation of particular sites having regard to their sustainability elsewhere in this report.

9.5.8 Criterion 6 has been revised to require appropriate levels of car parking in accordance with the Council’s Parking Standards which are now included in the plan. I see no conflict between this criterion and national guidance as such.

9.5.9 It seems to me that as revised the criteria listed in Policy T1 are not ambiguous.

9.5.10 I do not see how Policy T1, of itself, can provide clear “locational” guidance having regard to transport considerations. It can only lay down a range of criteria which need to be met once a location is proposed. There are allocations elsewhere in the plan which do provide locational guidance for certain forms of development. However, I agree that the policy should be amended to take into account the guidance on location in Planning Policy Guidance Note 13. The Council has also agreed and this has been done.

9.5.11 Parking standards have now been included in the plan.

9.5.12 The term often used in development plans is “well served” by public transport which I consider is similar to “highly accessible” as the latter tends to imply “very good access” to public transport. This is what the Council is trying to achieve. To my mind the altered Criterion 1 has recognised that development will be focussed in the Central Severn Vale, Stroud Urban Area and Principal Settlements.

9.5.13 I do share some of the concern of the objector that Policy T1, if read in isolation, would conflict with Policy E1A, as suggested for revision by me, in respect of B8 uses. I consider it would be helpful to add to the end of Criterion 1 after “public transport” the following “(except in the case of those uses considered appropriate for rural locations in Policy E1A).” I believe this would make it clear that there are certain types of uses, and in particular large scale B8, where a location related to the main road network, might take precedence over integration in a settlement.

9.5.14 I am in favour of positively worded policies, but in this case the revised wording suggested by the objector “that permission be granted for development which deals satisfactorily with the following issues” would be misleading. Even if all of the criteria in Policy T1 were to be met, the proposal might not comply with other policies in the plan. Because of this planning permission may not be granted.

9.5.15 It seems to me that Criterion 5, as revised, would accord with tests of reasonableness in Circular 1/97. The provision of highway improvements might be an integral part of development proposals and, therefore, reasonable and necessary to serve that development.

9.5.16 Now that paragraph 9.6.4 has been amended to refer to developments attracting large numbers of people to be located where there is good public transport access, instead of “large new developments” I do not consider that “large” needs to be further defined. I agree with the Council that the key issue of importance is the location of large trip generators and not the

size of the development.

9.5.17 Sustainability is defined in Section 2.2 of the plan as revised. This 6<sup>th</sup> bullet point is linked to the Housing Chapter of the plan. However, with the revision which the Council has included, by adding “to provide opportunities for access by public transport” I do not find the wording of the bullet point unacceptable, particularly as I have supported the allocation at Hunts Grove.

#### **RECOMMENDATION 9.5**

Modify Criterion 1 by adding after “pubic transport” the words “(except in the case of those uses which are considered appropriate for rural locations in Policy E1A).”

## **9.6 PARAGRAPH 9.7**

### **The Objections**

Tran/para. 9.7.0./298/0798 CTC Right to Ride Network

### **Summary of Objections**

(a) Stroud town centre is unattractive for cyclists in terms of safety

### **Inspector's Reasoning and Conclusions**

9.6.1 It seems to me that paragraph 9.7.2 of the supporting text expressly addresses the need to improve environmental conditions within Stroud Town Centre to make walking, cycling and public transport more attractive and reduce accidents. This would be by means of the Local Transport Plan and a town centre transport strategy. The approach is reflected in Policies T3 and T7.

#### **RECOMMENDATION 9.6**

Make no modification to the Plan in response to this objection.

## **9.7 POLICY T2**

## **The Objections**

T02/444/1955	Various Clients of Andrew Watton
T02/409/1421	Buchanan Partnership
T02/618/2638	South Cotswold Ramblers Association Group

## **Summary of Objections**

- (a) Scale of development policy applies to should be clarified
- (b) Basis on which contributions are required Paragraph 9.8.2 should be explicit
- (c) Paragraph 9.8.3 diversions should not be an unreasonable increase in length

## **Inspector's Reasoning and Conclusions**

9.7.1 I do not consider that it is appropriate for this policy to define a scale of development. Location may well be more important to safe pedestrian and disabled persons access than scale. However, the revised wording of this policy only requires such provision outside of an application site in appropriate circumstances. Any such provision would then need to be in accordance with advice in Circular 1/97.

9.7.2 This paragraph has been revised to state that a contribution “may be required” Whether or not such a contribution is justified in relation to a particular development would depend on compliance with the advice in paragraph 7 (i) to (v) in Circular 1/97

9.7.3 The supporting text only states that a route may be diverted where appropriate. The reasonableness or otherwise of any such diversion would be a matter for the Council and the public to consider having regard to the particular circumstances of the case.

## **RECOMMENDATION 9.7**

Make no modifications to the Plan in response to these objections.

## **9.8 POLICY T3**

### **The Objections**

T03/297/0777-CW	Westbury Homes (Holdings) Ltd
T03/11/0187-CW	Stroud Cycle Campaign
T03/444/3681	Various Clients of Andrew Watton
T03/444/1956	Various Clients of Andrew Watton
T03/296/0772	Persimmon Homes (Wessex) Ltd
T03/331/1032	National Farmers Union, South West Region
T03/409/1422	Buchanan Partnership

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T03/298/0799  
T03/298/0800

CTC Right to Ride Network  
CTC Right to Ride Network

### **Summary of Objections**

- (a) Policy should state that contributions 'will' be sought
- (b) It will not be possible for all development to provide access to a limited cycle network
- (c) Policy could place undue burden on rural business
- (d) Policy should only apply to major development
- (e) Scale of development Policy applies to should be clarified
- (f) Cycle links fall outside the control of applicants
- (g) Crossing points on road junctions should have on road cycle priority
- (h) New technology means greater opportunity for access by bike
- (i) Cycle routes are highways. Suggest rewording of paragraph 9.9.1

### **Inspector's Reasoning and Conclusions**

9.8.1 The wording has been revised to state that contributions will be sought where appropriate. Such contributions would need to be sought in accordance with advice in Circular 1/97. This objection has been conditionally withdrawn.

9.8.2 Policy T3 has been revised to accept that it will not always be appropriate or possible to provide convenient cycle access to the surrounding area, where there is a poor existing cycle network. The objection has been conditionally withdrawn

9.8.3 The revised wording of Policy T3 would ensure that an undue burden is not placed on rural businesses having regard to the surrounding cycle network.

9.8.4 With the revised wording proposed by the Council, I do not consider that the scale of development is of overriding importance. The location of development may well be of more significance than scale to the safe and convenient access for cyclists.

9.8.5 Although cycle links fall outside of the control of applicants they are considered as part of the Local Transport Plan. The District Council would be aware of them. Where a link is necessary to serve development a Planning Obligation may provide for that necessary link.

9.8.6 A local plan policy should not contain such detailed matters as priorities at road junctions. This would be a matter for the highway authority to consider as part of its programme to improve cycle access and safety through the Local Transport Plan including its "Highway Requirements for Developers".

9.8.7 The greater opportunity for access because of the improvements in pedal cycles is a matter to be considered as part of the Local Transport Plan when future routes are proposed.

9.8.8 The Council has revised this paragraph. The changes make it clear that motor free, but convenient cycle routes are preferable.

### **RECOMMENDATION 9.8**

Make no modifications to the Plan in response to these objections

## **9.9 POLICY T4**

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## **The Objections**

T04/329/1012	Cotswold Canals Trust
T04/424/1579	Stroud & Gloucestershire Green Party
T04/11/0193	Stroud Cycle Campaign
T04/11/0181-CW	Stroud Cycle Campaign
T04/11/0191-CW	Stroud Cycle Campaign
T04/21/0206	Cam Valley Cycleway Campaign
Map/444/3690	Various Clients of Andrew Watton
Map/424/1699	Stroud & Gloucestershire Green Party
Map/424/1692	Stroud & Gloucestershire Green Party

## **Summary of Objections**

- (a) Existing and proposed cycle routes should be shown on Proposals Maps, particularly Chalford to Eastcombe and Cam to Dursley
- (b) Detailed design studies are needed to ensure cycle users can be accommodated on towpaths
- (c) Plan should include full cycle path network in relation to housing location strategy

## **Inspector's Reasoning and Conclusions**

9.9.1 The Council has recognised that errors were made in identifying cycle routes on the Proposals Map and has amended them.

9.9.2 I agree that such studies are necessary. I presume they would, at present, be carried by the County Council as highway authority as part of the Local Transport Plan. The Council is proposing to safeguard towpaths by revising Policy R8.

9.9.3 The proposal to introduce a full cycle network in relation to housing strategy goes beyond what is required in national guidance. However, under advice in Planning Policy Guidance Note 13 a local authority is required to prepare a cycling strategy as part of the Local Transport Plan. Also the local planning authority should, in preparing local plans and dealing with planning applications, identify networks and routes and seek the provision of cycle routes and priority measures for cyclists in major new developments.

## **RECOMMENDATION 9.9**

Make no modifications to the Plan in response to these objections

## **9.10 POLICY T5**

## **The Objections**

T05/444/1957	Various Clients of Andrew Watton
T05/409/1423	Buchanan Partnership
T05/543/2301	Government Office for the South West
T05/21/0203	Cam Valley Cycleway Campaign
T05/731/4005-CW	Mc Carthy & Stone (Dev.) Ltd
T05/731/4006-CW	Mc Carthy & Stone (Dev.) Ltd
T05/408/1376	Hardwicke Court Estate

## **Summary of Objections**

- (a) No reference is made to the size of development and whether the policy is to be implemented without consideration of its implications on site or financially.
- (b) The basis on which commuted sums are to be calculated should be included in the plan and be open to challenge.
- (c) The parking standards do not form part of the Plan and as such the Plan cannot require compliance with them.
- (d) All development should provide a minimum number of cycle spaces. Class D1 institutions should not be exempt from provision.
- (e) The basis for calculating cycle parking standards and commuted sums should be included within the Plan and not as supplementary planning guidance.
- (f) There are certain types of development which will not generate a need for cycle parking.

## **Inspector's Reasoning and Conclusions**

9.10.1 The secure parking would be in accordance with the Council's Adopted Standards now incorporated into the plan. The provision would vary depending upon the size of the development. Consequently if it were necessary to negotiate contributions by means of a Planning Obligation they would be related to the scale of the proposal

9.10.2 To attempt to provide in the Plan a basis for calculation of secure cycle parking would be contrary to advice in Circular 1/97. Such detail would be unduly prescriptive and would be based on a blanket formulation that would be unacceptable.

9.10.3 The parking standards do now form part of the plan.

9.10.4 It seems to me there are two alternatives in dealing with cycle provision in respect of D1 uses. These are to lay down a minimum standard, which may be inadequate for the particular use and a higher standard may need to be negotiated by the planning authority. Alternatively, the Council could investigate the particular use and negotiate a cycle provision appropriate to the development. I prefer the former as it provides a basis for negotiation, although both should lead to appropriate cycle parking to serve the development. The Council has now agreed that a minimum cycle provision should be made.

9.10.5 I do not find the adopted minimum standards to be unduly onerous. Even nursing homes and sheltered housing projects may well have staff and visitors who come by cycle.

## **RECOMMENDATION 9.10**

Make no modifications to the Plan in response to these objections.

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## 9.11 POLICY T5A

### The Objections

T05A/444/3682	Various Clients of Andrew Watton
TO5A/578/3880	The House Builders Federation
TO5A/362/3336	Colthrop Farm Limited
T05A/412/3458	Crest Strategic Projects Limited
TO5A/228/3134	Stroud Town Council
TO5A/578/3879	The House Builders Federation
T05A/362/3337	Colthrop Farm Limited
T05A/412/3457	Crest Strategic Projects Limited

### Summary of Objections

- (a) The policy should not only require 10 miles per hour zones but 20 miles per hour zones and previous restrictions, whether they are 30, 40 or whatever.
- (b) The policy should be deleted as it seeks to prevent the granting of permission for developments that do not incorporate Home Zones, which have no statutory place in the English planning system. It would be entirely unreasonable to assess development proposals against such an unfounded objective.
- (c) There is no clear definition of 'home zones' and this approach may not be appropriate to new development. The issue is best addressed through development briefs for proposed allocations.
- (d) The reference to converting residential streets into 'public spaces for residents' in paragraph 9.9.1a is tautology.

### Inspector's Reasoning and Conclusions

9.11.1 The proposed policy, as revised, would require Home Zones to be created regardless of the location, form or scale of new housing development. Home Zones as I have known them abroad, and similar projects under trial in parts of the UK, mainly relate to the improvement of existing areas of housing to improve pedestrian safety. The aim is to change the way streets are used giving greater emphasis to the quality of life. The layout is such that motorists perceive that informal priority should be given to other road users. I see no reason why the principle of these zones should not be incorporated into new housing schemes supported by a policy in the local plan. However, it would not be reasonable to require all new housing to incorporate Home Zones on all sites, in all locations, or at all densities.

9.11.2 I have considered whether the provision of Home Zones could be added to Policy T1 as Criterion 4 deals with traffic calming, but because of the supporting text which provides an explanation of the reasoning behind the Home Zones I favour a separate policy. This should be reworded to allow the Council to consider whether the Home Zone approach is relevant to a particular housing proposal. Assessment would take into account the government advice, which

is intending to generate a rapid growth in the number of zones and provide grants in appropriate circumstances.

9.11.3 I accept the view of objectors that on large housing proposals the need for Home Zones should be identified by means of a development brief, so that developers are aware of what is expected of them at the outset. This is, however, a matter of implementation and does not affect the principle of a policy on Home Zones.

9.11.4 I do not favour the inclusion within the policy a speed restriction of 10 mph because in some larger Home Zones a range of speeds would be more appropriate. I consider traffic speeds should be included in the text but a range of speeds between 10 – 20 m.p.h. should be mentioned.

9.11.5 The wording of paragraph 9.9.1a of the supporting text has been amended by Proposed Change 212. This has clarified its meaning.

### **RECOMMENDATIONS 9.11**

- a) Delete Policy T5A and substitute the following:  
“All proposals for housing will be assessed to establish whether there is a need to provide a Home Zone as an integral part of the development. Such provision will depend on factors including location, form, scale, density and local traffic conditions.
- b) Add after the words “a low speed” in the last sentence of paragraph 9.9.1A, the phrase “between 10 and 20 m.p.h”
- c) Modify paragraph 9.9.1a in accordance with Proposed Change PRO212.

## **9.12 POLICY T6**

### **The Objections**

T06/1/3037-CW	Gloucestershire County Council
T06/444/1958	Various Clients of Andrew Watton
T06/315/0912	Bloor Homes
T06/1/0115-CW	Gloucestershire County Council
T06/297/0776-CW	Westbury Homes (Holdings) Ltd
T06/296/0773	Persimmon Homes (Wessex) Ltd
T06/502/2113	British Waterways

### **Summary of Objections**

- (a) New development should contribute to bus services where appropriate
  - (b) ‘Attracting large numbers of people’ is too restrictive
  - (c) Scale of development this policy applies to should be clarified
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(d) Park and sail opportunities may exist

### **Inspector's Reasoning and Conclusions**

9.12.1 This policy requires provision “where appropriate” which would include those attracting a large number of people. Mention has also been made of contributions being sought to secure appropriate public transport provision. The objection is conditionally withdrawn.

9.12.2 The phrase “large numbers of people” is not defined numerically. In my view, in practice, if the impact of a new development were such that the existing public transport system could not cope with it, because of the number of visitors attracted, then there would clearly be a need for improvement to the public transport system. However, this phrase has been deleted under Proposed Change 214 as it is too restrictive having regard to advice in PPG13. In my view it is not the scale of development which is, of itself, the important issue but the number of journeys created and their implications for public transport.

9.12.3 The Council has revised this policy to clarify that development proposals should cater for the needs of bus and taxi operators and the provision of ancillary facilities, only where appropriate.

9.12.4 In some areas water buses and passenger boats are playing an increasingly important part in moving people. However, I have no evidence before me that such proposals are imminent and they should be considered in the first instance as part of an integrated transport system in the Local Transport Plan.

### **RECOMMENDATION 9.12**

Make no further modifications to the Plan in response to these objections but modify in accordance with Proposed Change PRO214.

## **9.13 POLICY T7**

### **The Objections**

T07/30/0216

J E Parsons

T07/444/1959

Various Clients of Andrew Watton

### **Summary of Objections**

- (a) The proposed capacity at the interchange is inadequate as there is an overall policy to increase bus usage.
- (b) The proposal is effectively a blight on the area if the scheme for the interchange is aborted. Provision for this should be included in the Plan.
- (c) Interchange would appear to have access implications for the Post Office

### **Inspector's Reasoning and Conclusions**

9.13.1 Although the details of the scheme would be subject to further consideration taking into account the needs of adjoining landowners, the proposal is for an interchange facility, with buses not remaining for long periods, and not a terminus. From my visit I consider that such a facility is clearly needed in this location to provide a link to the town centre by integrating sustainable transport modes.

9.13.2 The interchange is being actively promoted by the Council, who consider it to be realistic in land use terms. I can only assume the Council will proceed as quickly as possible to its implementation. According to the evidence the principle issues have been largely resolved. This would involve the provision of car parking spaces to the south of the station to compensate for the loss to the north. With a surface car park in Cheapside it appears that there would only be a limited area remaining for development. I have dealt with the development of Cheapside in the Town Centre and Retailing Chapter 6 of the Plan. From the most recent evidence at Inquiry there may well be more up to date information provided prior to adoption of this plan.

9.13.3 As mentioned in 9.13.1 the needs of adjoining owners will need to be considered prior to details of the scheme being agreed.

### **RECOMMENDATION 9.13**

Make no modifications to the Plan in response to these objections

## **9.14 POLICY T8**

### **The Objections**

T08/410/1443-CW	CPRE - Berkeley Vale
T08/543/2302	Government Office for the South West
T08/408/1370	Hardwicke Court Estate
T08/618/2640	South Cotswold Ramblers Association Group
T08/409/1424	Buchanan Partnership
T08/298/0801	CTC Right to Ride Network

### **Summary of Objections**

- (a) Heavy rail systems are inappropriate to meet demands of short commuter journeys
- (b) New station at Chalford would be attractive for ramblers walking in the Cotswolds
- (c) No justification is given for supporting stations at Quedgeley and Charfield
- (d) Redraft to make clear how the acceptability of potential new sites will be determined
- (e) What is the expected level of rail services at new stations? How is it to be achieved?

- (f) Transfer of freight from road to rail at Sharpness
- (g) “permit” should be replaced with “encourage” and prioritise opening of stations.
- (h) Rail freight line could be deactivated between Sharpness to Berkeley Road

### **Inspector's Reasoning and Conclusions**

9.14.1 Paragraph 9.11.4 does not state that heavy rail systems are ideal for short commuter journeys but recognises the importance to commuting of the re-opened Cam and Dursley Station and the existing infrastructure; also the potential for short journeys between Ebley and Stroud.

9.14.2 It appears unlikely from the evidence that there would be any opportunity to re-open Chalford. In considering the Strategy produced as part of the Local Transport Plan it has not been able to identify a suitable location for a new station.

9.14.3 Although Quedgeley has been deleted from the supporting text the Council is supporting a new station within the mixed use development at Hunts Grove. The supporting text makes it clear that the re-opening of stations, or the opening of new ones, in appropriate locations reduce longer car journeys for all types of trip. These stations would also provide rail access to serve new development sites. Charfield is outside the district and no reference is now made to it although discussions are taking place to open up the station. It would be helpful in paragraph 9.11.14 to give the reasons for this and the implications for towns in Stroud District.

9.14.4 As drafted the policy did not provide a clear basis for planning decisions. The Council has now clarified that the acceptability of potential sites for new stations will depend upon feasibility studies.

9.14.5 In my view an assessment of rail service by the operating companies in conjunction with the Council would need to have regard to employment and housing allocations. This could only be done on a station to station basis following a feasibility study.

9.14.6 There appears to be little use of the Sharpness freight line at present and I would not expect change to occur unless the particular development of land allocated in the Plan for employment use leads to a greater use of the line and freight facility. It is too early to determine the future use of the line.

9.14.7 I believe where possible a policy should be as definite as possible. I prefer “permitted” to “encourage”. In my view it would be unrealistic for the Council to incorporate a programme of openings as any priority will depend on commercial decisions outside the control of the Council.

### **RECOMMENDATION 9.14**

Modify by adding to the supporting text at paragraph 9.11.4 an explanation on how the opening of Charfield station will reflect on Stroud District.

## **9.15 POLICY T9**

## **The Objections**

T09/11/0189-CW	Stroud Cycle Campaign
T09/342/1099	Railtrack Plc
T09/410/1444-CW	CPRE - Berkeley Vale
T09/444/1960	Various Clients of Andrew Watton

## **Summary of Objections**

- (a) Policy should allow for other stations to be reopened
- (b) Policy is too restrictive and blights land
- (c) No mention of need to protect existing railroads from development
- (d) Redevelopment of land no longer required for operational purposes by rail companies should be allowed

## **Inspector's Reasoning and Conclusions**

9.15.1 Policy T8 already allows for the opening or re-opening of stations. A local plan should be realistic and unless the Council is satisfied that other halts are likely to come forward during the plan period, and are in a location where there is a clear need for rail services, they should not be included.

9.15.2 Public access to rail transport is becoming more important having regard to national guidance which encourages other modes of transport than the private car. Only two sites are identified in the policy and I consider it is important to safeguard them, unless alternatives come forward through development proposals. The explanatory text has been amended to indicate that optional sites might be acceptable.

9.15.3 The protection of track laying on existing railroads is not a matter for a local plan and it would be inappropriate to mention it in a policy dealing with the safeguarding of station sites, which are outside the district.

9.15.4 I believe it is now too simplistic to assume that the short term interests of operating companies, or Network Rail should determine that operational land is no longer required and should be made available for other forms of development. Any such decision needs to be related to allocations of land for development, as part of an integrated transport plan. However, the Council accepts in the explanatory text that alternative sites for stations may become available as part of new development proposals. If that were to occur the policy in the plan would need to be changed to recognise this. The re-opening of the former Stonehouse station is already identified in the Local Transport Plan as an improvement to links in the Stroud Valleys Area. Ebley awaits a feasibility study. In general, if following a study operational land is identified as no longer being required then it would not be safeguarded.

## **RECOMMENDATION 9.15**

Make no modifications to the Plan in response to these objections.

## **9.16 PARAGRAPH 9.12**

### **The Objections**

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Tran/para.9.12./499/2076      The Company of the Proprietors of the Stroudwater

### Summary of Objections

- (a) Omission of Policy relating to the potential of canals for freight transportation

### Inspector's Reasoning and Conclusions

9.16.1      I accept there is no policy which specifically refers to the potential of canals for freight. I am not sure what such a policy would achieve as it could only be written in general terms. From my visits it appears that little commercial traffic proceeds from Sharpness to Gloucester, and canals in the district are predominantly used for recreational purposes. The Council does accept in the supporting text at paragraphs 9.12.1 and 9.12.2 greater use of water borne freight in place of long distance road transport. However, unless there are particular sites or facilities along the canals which need to be safeguarded in the interests of encouraging freight, and I am not aware of any from the evidence, a new policy would be a statement of intent and would not be helpful in determining planning proposals.

### RECOMMENDATION 9.16

Make no modification to the Plan in response to this objection.

## 9.17 POLICY T10

### The Objections

T10/502/2114	British Waterways
T10/502/2115	British Waterways
T10/444/1961	Various Clients of Andrew Watton
T10/502/2116	British Waterways

### Summary of Objections

- (a) The policy should address a greater range of issues in addition to the protection of the viability of Sharpness Docks.
- (b) The boundary of the Docks should be specifically defined as the area leased to Sharpness Dock Limited.
- (c) The policy is too simplistic as it does not provide for alternatives should designated areas be needed for viable development.
- (d) The plan should include a new policy to address issues in the British Waterways document.

### Inspector's Reasoning and Conclusions

9.17.1      This policy is specific to the protection of the docks which is an important

component for sustainable freight transport. It is intentionally restrictive to protect the dock as part of a sustainable transport network, including a commercial canal and branch line. I agree that there are a greater range of issues to be considered, such as employment, but these are dealt with elsewhere in the plan.

9.17.2 It is not clear to me why the boundary of the docks should be specifically defined as the area leased to Sharpness Dock Limited. In land use terms the associated areas of employment are contiguous with the operational dock area and read as part of it.

9.17.3 The range of employment uses is to be assessed against a policy related to location and accessibility. I have dealt with this matter in the employment chapter of this report.

9.17.4 It seems to me that the policy is concisely worded to protect the docks from harmful development. A new policy “encouraging” water borne freight and the role of waterways would merely be a statement of intent and would not give clear guidance about how future proposals would be dealt with. However, although I am not aware of time scale it might be helpful for the Council to consider including in the supporting text that the canals when restored for navigation will be available for the transport of freight.

### **RECOMMENDATION 9.17**

The Council to consider including in the supporting text at paragraph 9.12.1 reference to the future use of the canals for the transport of freight. Otherwise make no modifications to the Plan in response to these objections.

## **9.18 POLICY T11**

### **The Objections**

T11/442/3624	South West RSL Planning Consortium
T11/409/3427	Buchanan Partnership
T11/228/3111	Stroud Town Council
T11/798/4101	Wm Morrison Supermarkets plc
T11/543/2303	Government Office for the South West
T11/341/3263	Kingswood Parish Council
T11/341/3264	Kingswood Parish Council
T11/444/1962	Various Clients of Andrew Watton
T11/442/1847	South West RSL Planning Consortium
T11/415/3541	Redrow Homes (SW) Limited
T11/1/0018-CW	Gloucestershire County Council
T11/226/3105	Mr S C Fowler
T11/424/1708	Stroud & Gloucestershire Green Party
T11/444/1963	Various clients of Andrew Watton

### **Summary of Objections**

- (a) The operation of Appendix 8 will increase on-street parking in rural parts of the District, where there is an inadequate transport system and no alternative parking facilities.
- (b) The standards do not comply fully with PPG13 or Circular 6/98, and have no flexibility to recognise the lower car ownership rates amongst housing association tenants.
- (c) The standards are over-generous and inconsistent with PPG3 and draft PPG13.
- (d) The operation of Appendix 8 will make the vehicle parking for retail developments in Stroud and Dursley town centres unnecessarily restrictive and may inhibit competition.
- (e) The parking standards do not form part of the Plan and as such the Plan cannot require compliance with them. The Plan should include parking standards in accordance with PPG13, as maximum parking standards. Parking policies should be set clearly within the context of providing for accessibility by a range of transport, and support overall location policies and not provide for development where accessibility requirements are only by car.
- (f) Reference should be made that parking guidelines will be subject to regular review.
- (g) Car parking requirements may be a burden to regeneration
- (h) The policy should actively encourage car free housing.

### **Inspector's Reasoning and Conclusions**

9.18.1 The parking standards have been revised in Proposed Changes PRO215, PRO216 and PRO217 from a minimum to a maximum to take into account national guidance in Planning Policy Guidance Notes 3 and 13 and the detailed standards recommended by the County Council in the Local Transport Plan. However, I am concerned that the parking standard for C3 Housing/Flats is a maximum of 2 per dwelling average throughout the district whereas the County recommendation is 1 per dwelling. National guidance in Planning Policy Guidance Note 3 advises that car parking standards that result, on average, in development with more than 1.5 off street parking spaces per dwelling are unlikely to reflect the Government's emphasis on securing sustainable developments; and policies which would result in higher levels of off street parking, especially in urban areas, should not be adopted. Although I accept from my visit that because of the particular character of some parts of the rural area that a standard of 2 spaces per dwelling may be appropriate I consider that to adopt it overall would be contrary to national guidance.

9.18.2 There is at present a discrepancy between the standards in the Local Transport Plan and those in Planning Policy Guidance Note 13 Transport. I understand that the County Council is at present considering whether national guidance should prevail. In my view it should, unless there are particular local circumstances which dictate otherwise.

9.18.3 The supporting text in paragraphs 9.13.1 and 9.13.2 have been amended to better reflect national guidance and the County Council's policy on parking. As the parking standards are now maximum standards, there is the flexibility to reduce them in appropriate circumstances. On housing Planning Policy Guidance Note3 advises local authorities not to require developers to provide more spaces than they themselves, or potential occupiers, might want.

9.18.4 The parking standards now form part of the plan in accordance with advice in Planning Policy Guidance Note 13.

9.18.5 It seems to me that the management of the overall parking provision in a town centre

is more important to its viability and vitality than the maximum parking standards for a single unit. In my experience, town centre development's parking should be shared, with priority given to short term shoppers. However, the requirements in this regard vary from one town to another and town centre management issues cannot be dealt with in detail in a local plan policy.

9.18.6 The Council has agreed that standards will be subject to regular review. This is part of the plan, monitor and manage process.

9.18.7 The standards generally are based on national guidance and in my view are an improvement on the arbitrary minimum standards previously used. There may well be some burden on development because of a need to provide some form of parking, whether operational or otherwise. Similarly cycle provision may be required. However, overall I consider the present approach is less likely to impose an unnecessary burden on urban regeneration than previous standards particularly in areas well served by public transport.

9.18.8 The supporting text has been amended in paragraph 9.13.2 to emphasise that in promoting the use of underused buildings to revitalise town centres no parking provision needs to be made. I do not consider a separate policy should be included to merely encourage car free housing subject to a Section 106 agreement, as any such decision would need to be dealt with on an individual basis having regard to national guidance on commuted payments.

9.18.9 I do not consider this policy, of itself, should encourage car free housing. Whether car free housing would be appropriate would depend upon its location and the easy access to an alternative means of travel. Policy T11 is intended to deal with all forms of development not just housing in town centres.

#### **RECOMMENDATIONS 9.18**

- a) Modify paragraphs 9.13.1 and 9.13.2 in accordance with Proposed Changes PRO215 and PRO216.
- b) Modify Adopted Parking Standards in accordance with Proposed Change PRO217 and further modify standard C3 Dwelling houses/Flats in Table B of Appendix 8 to comply with guidance in Planning Policy Guidance Note 3.

## **9.19 POLICY T12**

### **The Objections**

T12/543/2304  
T12/1/0017-CW

Government Office for the South West  
Gloucestershire County Council

### **Summary of Objections**

- (a) No basis for seeking commuted payments in lieu of parking not being provided on site
- (b) The policy does not take into account accessibility by non-car modes.

### **Inspector's Reasoning and Conclusions**

9.19.1 The Council has deleted this policy in the Revised Deposit Draft Plan. Having regard to national guidance on parking and non car modes of transport I see no reason to retain it as the Adopted Standards and the supporting text will set out circumstances where reduced parking requirements would apply. Developer contributions could be sought in accordance with other policies in the Transport Chapter.

### **RECOMMENDATION 9.19**

Make no modification to the Plan in response to these objections

## **9.20 POLICY T13**

### **The Objections**

T13/226/0525	Mr S C Fowler
T13/388/1259	David Cheffings
T13 (DurTC)/317/0924	Oxford, Swindon & Gloucester Coop Society Ltd.
T13 (DurTC)/317/0925	Oxford, Swindon & Gloucester Coop Society Ltd.
T13/444/1964	Various Clients of Andrew Watton
T13/428/1725	Newsquest (Wales & Western)
T13/537/2231	Mr & Mrs J Redfern
T13/428/1726	Newsquest (Wales & Western)
T13/141/0375	Mr G Moyser
T13/428/3548	Newsquest (Wales & Western)

### **Summary of Objections**

- (a) Line of relief road should be via Kingshill Lane and away from the centre.
  - (b) Land should not be blighted for the Plan period.
  - (c) Reference to new supermarket and housing are inappropriate in a Policy and paragraph dealing with road proposals.
  - (d) Funding of road is inappropriate matter for the Plan and presupposes that sufficient funds will arise from planning obligations.
  - (e) Policy gives no indication as to how the relief road is to be funded and at what cost.
  - (f) Amend Dursley Inset Map in favour of a more indicative alignment.
  - (g) Completion of the ring road towards the middle of the Plan period is misleading when its funding is not established.
  - (h) The proposal may prejudice access to the Delivery Office.
  - (i) Delete and take relief road through Lister Petter site.
  - (j) Proposed road will cause environmental problems by pollution and congestion and is not sustainable.
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### **Inspector's Reasoning and Conclusions**

9.20.1 The preferred route of the new outer relief, or new distributor road, is through the allocated sites MU3 and MU4 and no longer includes a relief road through the supermarket site. See the Dursley Chapter of this report. T13 has subsequently been proposed for deletion from the plan.

### **RECOMMENDATION 9.20**

See my reasoning and conclusions under Policy S7 in the Town Centres and Retailing chapter and Policy T13 in the Dursley chapter of this report.

## **9.21 POLICY T14**

### **The Objections**

T14/543/2305	Government Office for the South West
T14/444/1965	Various Clients of Andrew Watton
T14/408/1371	Hardwicke Court Estate
T14/222/0516	Mr Michael Warner
T14/1/0167-CW	Gloucestershire County Council
T14/423/1540-CW	Tewkesbury Borough Council

### **Summary of Objections**

- (a) The policy should reflect national guidance regarding exceptional need or safety grounds for permitting MSA at intervals of less than 30 miles.
- (b) There is a proven need for an MSA between Michaelwood and Stresham and the development would be economically beneficial to the Stroud Valley, and the Hunts Grove site is well suited to a MSA.
- (c) The location of MSAs is a sub-regional issue dealt with under national planning guidance and should not be included as a policy in a local plan.
- (d) Section 9.15 contains errors and omissions.

### **Inspector's Reasoning and Conclusions**

9.21.1 The policy has been amended to take into account a number of the objections. The outstanding objections relate to whether the policy should be in the Plan at all, and to contentions that there is a proven need for a Motorway Service Area in the District.

9.21.2 Quite clearly, much of the reasoned justification to this policy, in relation to PPG13 and the situation within Tewkesbury District, is out of date, and if the policy remains, would need modifying. However, I am firmly of the view that there is no need for this policy. Its starting point is that there is no need for an MSA within the Stroud District, but includes the caveat, which is included in national policy, that service areas at intervals of less than 30 miles may be permitted where there are exceptional need or safety grounds for doing so. In the event

that a planning application were to be made for an MSA, the terms of national guidance would be central to the decision, to which Policy T14 adds nothing, as would the other policies of this Plan, the contents of the Environmental Statement required under the Environmental Impact Assessment Regulations, and any other material considerations. Since development plans should not be over elaborate or long, this policy and its reasoned justification should be deleted.

**RECOMMENDATION 9.21**

Modify the Plan by deleting Policy T14 and its reasoned justification.