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Local Plan Review
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18 December 2019

Dear Sir / Madam

Stroud District Local Plan Review - Draft Plan November 2019

INTRODUCTION

Rapleys LLP (Rapleys) is instructed by Crest Nicholson (Crest) to submit representations to the Stroud District Local Plan Review Draft plan for Consultation - November 2019. Representations were submitted in January 2019 to the preceding Local Plan Emerging Strategy Paper - November 2018; the comments contained herein should be read in conjunction with the previous submission.

This submission is made in respect of Crest's land interests, comprising the major component of the land identified under draft policy PS30 - Hunts Grove Extension, Policy PS30 carries forward the existing allocation within the adopted Local Plan under Policy SA4, which identifies the land to the south of Haresfield Lane for a 750 dwelling extension to the main Hunts Grove site. Crest appeared at the previous Local Plan examination and provided evidence in support of the allocation and has also liaised regularly with the planning authority regarding the proposed delivery trajectory. As set out within the current five year housing land supply document - "Stroud District Five Year Housing Land Supply - August 2019" the allocation is forecast to begin contributing to housing supply in 2022/23 with completion scheduled for 2030.

Crest has already held pre-application discussions with officers of Stroud District Council and is in the process of preparing an outline planning application to bring forward the land under its control falling within the existing Policy SA4 allocation. These representations should be considered in this context. The comments contained herein are made in respect of the allocation itself and with regard to those policies and provisions within the Plan relevant to Crest's interests. They are made in the order in which they appear within the consultation document, with policy and page references provided to assist. The comments are framed against the broad consultation themes set out on the Draft Local Plan Review web page:

- **Do you support the Council's preferred strategy for meeting Stroud District's future growth and development needs?**

Crest is broadly supportive of the Council's proposed strategy, which is balanced and seeks to deliver development across the district, subject to the comments set out within the representations.

- **Are there any additional issues or constraints relating to the proposed sites? And how should specific constraints, needs and opportunities be reflected in the final site allocation policies?**

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Crest supports the main components of the proposed strategy, including the reinforcement of the existing major growth locations South of Gloucester; at Stonehouse; and at Cam, all of which have the potential to deliver SMART growth by locating homes, access to sustainable transport and jobs and services in close proximity, but emphasises the importance of ensuring that strategic partners are engaged fully in plan preparation to ensure that the approach to infrastructure delivery is addressed constructively and pro-actively in the interests of the continuous delivery of growth at the major strategic locations.

- **Are any further changes to the proposed policies necessary? Are there specific things that should be included in supporting text?**

Crest’s detailed comments are outlined within the representations below, which are submitted in the interests of achieving a sound plan able to consistently and fully meet the growth objectives that the local plan needs to address. Where the approach to a policy objective appears to be out of step with the current national policy position this is highlighted, albeit it is recognised that during the formulation of the Local Plan, which is scheduled to take place over the next two years, the wider national context may change and the Local Plan will need to reflect any such changes.

PUTTING IT INTO PERSPECTIVE - OUR DISTRICT’S ISSUES, CHALLENGES AND NEEDS

Stroud District Today - Paragraph 1.30 (p.12) (Comment / Support subject to changes)

The bullet points under paragraph 1.30 highlight that there are low levels of unemployment within the district, but too few job opportunities precipitating high levels of out commuting. This is characterised as an issue to be addressed through policy-making, the aspiration being to reduce levels of out-commuting and promote greater self-containment. This should not function as a key driver of Local Plan policy. The district is well-connected to important economic centres to the north (Gloucester/Cheltenham and Birmingham); the south (Bristol) and the south-east (Swindon) by road and rail and the Local Plan should recognize and embrace this rather than seeking to work against it. The Strategic Economic Plan 2.0 (G-First LEP) identifies the connectivity of the County as a key strength to be developed and the Local Plan should ensure it is aligned with the SEP and the emerging Local Industrial Strategy (LIS) in accepting the M5 corridor acts as a key economic artery that can deliver prosperity and higher standards of living to residents.

The significant growth levels occurring within the corridor should be embraced and planned for through the provision of sustainable travel planning, support for bolstering sustainable travel opportunities and then the provision of appropriate strategic infrastructure to support development and to increase the efficiency of the hub locations that occur at and around junctions on the strategic road network. Planning to support and deliver sustainable infrastructure investment at junctions 12 and 13 of the M5 should be a key objective of the Local Plan in support of the overall strategy to compliment, where necessary, a progressive sustainable approach to managing travel demand and the widening of sustainable travel choices.

40 Key Issues - Priority Issues (p.14) (Comment / Support)

The ambition to achieve carbon neutrality across the district by 2030 is acknowledged and reflects ambitions being expressed by a number of Councils across the country in the face of the widely declared climate emergency. Crest recognises the need to plan for development in a responsible and sustainable manner and supports an integrated approach to development. However, a number of the draft policy provisions contained within the document are not currently supported by national policy

and therefore are likely to encounter soundness challenges at the time the Local Plan is examined; unless the national policy position changes in the interim. In absence of changes that support the Plan's stance amendments should be made to ensure consistency with national policy.

Crest supports the Plan in seeking to co-locate housing and employment growth in the interests of sustainable development and also supports the objective to build upon the strategic growth corridor formed by the M5 and A38. In support of this key objective the Plan must work to ensure that relevant statutory agencies are committed through engagement with the plan-making process and through the formulation of their investment plans to support the delivery of growth in accordance with the Plan's emerging strategy. This should be achieved through a combination of pragmatic and realistic cooperation and through the identification of, and support for, strategic improvements to infrastructure that are necessary to support growth having examined fully opportunities to manage travel demand and to promote sustainable travel alternatives.

Economy (p.15) (Comment)

Addressing the high level of commuting referred to should include measures to improve the efficiency and safety of the strategic road network through travel and traffic management and the deployment of engineered solutions as appropriate in support of this objective. As set out above the location of the district between key employment centres to the north, south and south east is a factor that should be planned for positively. The attractiveness of the district as a place to live will naturally lead to employees from within these centres choosing to live within Stroud district, while continuing to work within higher order urban locations. The Plan's strategy should be realistic in recognising this condition and include measures to support sustainable commuting.

STROUD DISTRICT TOMORROW - A VISION FOR THE FUTURE

Vision to 2040 (p.22) (Comment / Support subject to changes)

The Vision as expressed is too vague and does not relate closely enough to policies contained within the Plan. Policies should be clearly informed by the Vision, and manifest themselves as the conduit via which the outcomes sought by the Vision can be achieved. Therefore the Vision should be completely clear that if the policies are successfully applied, the state of the district described by the Vision is the natural conclusion. Consequently the key development proposals subject to policy provisions within the Plan should form part of the described outcomes, expressed in specific terms such that there can be no mistake that this Vision relates to Stroud District and is the product of an effective Local Plan. As drafted it is too generic and vague, and by this fact is not capable of being measured. It is therefore not effective.

Pursuant to the above, it should articulate the key aspects of the district that the Plan's policies seek to build upon; referring to the strategic location between Gloucester/Cheltenham, Bristol and Swindon and the existence of important transport connections by road and rail to these locations and to Birmingham and London beyond. There should be recognition that the Plan seeks to deliver new strategic-scale communities to the south of Gloucester, at Stonehouse, at Cam and new garden-style communities at Sharpness and Wisloe, and through these policies there will be an improvement in health and well-being; improved access to housing and greater sustainable prosperity for all.

As currently expressed there is no clear connection between the policies that flow from the vision, which are designed to facilitate development and to influence and deliver growth sustainably. To be effective the Vision and the policies should be seamlessly connected so it is clear to the reader how the policies will fulfil the Vision and how the Vision gave rise to the policies.

Strategic Objective SO4: Transport and Travel (p.24) (Comment / Support subject to changes)

As currently drafted there is too great a focus on the private car, which is identified throughout the Local Plan as a mode of transport to be specifically marginalised, with the curtailment of car-use expressed as an active objective. This is considered to be both unrealistic and to adopt a focus that is too mode-specific, within a policy that should properly be seeking to increase the availability and attractiveness of sustainable travel choices, not to penalise a particular mode. It is also considered to be unrealistic within a predominantly rural district, where mass-transit solutions are largely unfeasible and where for many residents there will be no realistic alternative to car use. In addition, in a Plan that looks forward to 2040, there should be acknowledgement that alternative fuel sources and developing technologies may lead to changing perceptions regarding the use of private vehicles.

The policy should be re-cast to reflect the approach taken by the NPPF (paragraphs 102 - 104 particularly), which advocates recognition of the potential future role of alternative technologies; the promotion of walking, cycling and public transport; the assessment and mitigation of any adverse impacts of traffic and transport infrastructure and the promotion of patterns of development that reduce the need to travel. Focus on a particular mode of transport is not currently supported by the NPPF and should not form part of a strategic objective within the Local Plan. The objective should concentrate on encouraging SMART growth by designing developments in ways that reduce the need to travel and then on promoting sustainable travel choices.

AN INTRODUCTION TO THE DEVELOPMENT STRATEGY

Paragraph 2.10 (p.25) (Comment / Support subject to changes)

The paragraph is supported in its recognition of the close interrelationships between Stroud district and the surrounding sub-region, including the higher-order centres of Gloucester and Bristol and the wider regions expanding across the South West and the Midlands. As set out above, the SEP 2.0 recognises this as a strength and an opportunity (SWOT Analysis p.12). The strategy should seek to support these established commuting links by ensuring that strategic growth is planned in close proximity to strategic transport connections. The Plan should seek to influence such connections positively as part of a hybrid approach that acknowledges and embraces these strengths while seeking to facilitate remote working and employment growth within the district.

The Draft Strategy's Headlines (p.26) (Support subject to changes)

The headlines fail to mention the planned strategic residential growth at the Hunts Grove extension and South of Hardwicke, which will jointly deliver almost 2,000 new dwellings. Alongside the planned employment growth around junction 12, this is a key growth location that is not adequately referenced in this section of the Plan; or sufficiently on the Development Strategy diagram on the facing page (p.27). A casual observer of the map would conclude that this is not a key location for growth, which would be misleading when the contribution made by the south Gloucester fringe area is placed into context (see below).

What this strategy means for where you live Paragraph 2.23a (p.28) (Support subject to change)

This paragraph should be reworded to emphasise that the growth plans to the south of Gloucester are in fact part of a balanced strategy involving both housing and employment that will continue the long-established strategic growth policy to the south of Gloucester realised through successive Local Plans. Hunts Grove is a continuing committed scheme that is being delivered; the extension of 750 dwellings

is an allocation in the adopted Local Plan that is being carried forward, while planned development south of Hardwicke represents the continuation of growth to the west of the A38, linking existing neighbourhoods within Hardwicke to the Quedgeley West employment park adjacent to Cross Keys roundabout. The planned employment growth to the east of the M5 forms the third component of a balanced approach to delivering new homes and jobs adjacent to the principal urban area of Gloucester and with ready access to the M5 at junction 12. The paragraph underplays the significance of this location within the Local Plan strategy overall; its important role and SMART growth credentials should be highlighted more clearly.

What are the key challenges to this emerging strategy? Paragraphs 2.27-2.31 (p.29) (Comment / Support)

The broadly-based strategy is supported and represents a pragmatic response to the challenges facing the district; there is also welcome recognition that the components that form the Plan’s delivery strategy have different trajectories. It will be important to ensure that sites, which are already committed and allocated, such as the Hunts Grove extension, should not be made subject to any delivery hurdles or encumbrances arising as a consequence of the scheduling of necessary infrastructure improvements or reinforcement. The Council should work with the statutory agencies and other partners to ensure that the key junctions on the motorway network that may require improvement to support development are programmed to accord with the Plan’s objectives. It is notable that the initial phase of development (2020-25) identified on p.193 shows the Hunts Grove extension coming forward within this period and therefore it will be important to ensure that any improvements to junction 12 identified as necessary to facilitate housing and employment growth are programmed to occur in this window. The Local Plan strategy should prioritise early delivery of existing allocations to ensure there is a steady and even delivery trajectory across the Plan period, acknowledging that the new settlement proposals at Wisloe and Sharpness will likely be more challenging to deliver than established locations such as Hunts Grove.

It should be noted that the obligation to safeguard land for a new rail station at Hunts Grove via the outline planning permission has lapsed and the site has now been built out around this location. While the land subject to the Local Plan safeguarding notation remains undeveloped, the residential phases surrounding this area have been completed in absence of any station proposal. Access arrangements in this area have not specifically anticipated provision of a station and this should be recognised via the emerging policy.

HOUSING

Stroud District’s housing distribution up to 2040 Table 3/Paragraph 2.47 (p.33) (Comment)

It is important that the explanation of the development strategy, insofar as it relates the edge of Gloucester, makes clear that the allocations within the Local Plan represent continuation of a long-established growth strategy, the culmination of which will be the development of new neighbourhoods on a scale similar to that (in terms of population) found at Stonehouse. Hunts Grove, when complete, will comprise 2,500 dwellings (5,875 pop.), while South of Hardwicke will number 1,200 new homes (2,820 pop.); in addition the proposed employment allocations to the south of the M5 (PS32, PS43) will provide a further 14 hectares of employment development. The edge of Gloucester component of the development strategy is of central importance to the Local Plan and its delivery should be prioritised early in the Plan period, with necessary support given to facilitating its delivery.

CORE POLICIES

Core Policy DCP1 - Delivering Carbon Neutral by 2030 (p.47) (Comment)

The policy will need to acknowledge the current national planning policy position set out within the Climate Change Act 2008, the 2015 Written Ministerial Statement and reflected within NPPG (003 ID:6-003-20140612; 012 ID:6-012-20190315). It should also reflect the relevant provisions within the NPPF - Promoting Sustainable Transport (paragraphs 102-104). As drafted the policy is punitive rather than progressive in its approach; the wording focuses on marginalisation of private car use and the prioritisation of walking, cycling and public transport use over private transport modes, which the NPPF does not support. Opportunities to promote walking, cycling and public transport should be sought when plan-making, but there is no support for promoting these modes at the expense of other forms of transport. The NPPF advocates the widening of choice and active management of patterns of growth so that travel demand is reduced; it does not include provisions that discourage the use of the private car, irrespective of fuel source. As worded the policy is out of step with the NPPF and is therefore likely to be found to be unsound.

Core Policy CP2 - Strategic Growth and Development Locations (p.48) (Support/Comment)

The inclusion of the Hunts Grove Extension within the policy setting out where strategic growth should be directed within Stroud is supported by Crest as this policy commitment was established via the Stroud District Local Plan November 2015 under policies CP2 and SA4. The Hunts Grove Extension remains an important strategic development site that will help to meet the needs of the District within the early years of the plan period. Hunts Grove is sustainably located in close proximity to major employment, existing and planned, and established and improving public transport connections. Crest strongly supports the continued allocation of the site as part of the sustainable new community being delivered at Hunts Grove.

Crest does not have view on the overall quantum of development planned via the Local Plan, other than to observe that the target of 12,800 dwellings is the minimum figure identified to meet the needs of the district calculated using the Government's standard methodology. The Hunts Grove extension is a component of this 'baseline' requirement and is therefore a core requirement of the strategy. The policy also includes a reserve allocation at Whaddon to cater for the potential unmet needs of Gloucester City, further emphasising the strategic significance of the Gloucester fringe, while acknowledging at paragraph 2.45 that these figures may need to increase via the anticipated review of the standard methodology. The plan strategy is considered to be pragmatic and sufficiently flexible to respond to additional demands that may arise during the formulation process via the inclusion of the Whaddon allocation and the caveat that additional provision to that already allocated may be required.

Core Policy CP3 - Settlement Hierarchy (p.50) (Comment / Support subject to changes)

The application of 'modest' as a description of the level of growth deemed appropriate at Tier 2 Local Service Centres - including Hunts Grove - is considered to be inconsistent with the strategy of the Plan, which makes provision for 750 new homes at Hunts Grove. This level of growth, within the context of the Local Plan, is clearly not 'modest' and it should be made clear through the wording that this allowance applies to Hunts Grove once it has been developed fully in accordance with the existing permission and the existing allocation.

Core Policy CP4 - Place Making (p.53) (Comment / Support subject to changes)

The policy is not clearly expressed in its intention and should be revised to accord with the provisions contained within the National Design Guide. It is recommended that the policy should draw upon the ten characteristics of well-designed places set out within the guide and which are developed within it. This is an appropriate reference point for place-making policies and CP4 should now be re-drafted to bring it into line with its provisions.

Core Policy CP5 - Environmental development principles for strategic sites (p.54) (Support subject to changes)

Criterion 5 relating to design coding should be revised to reflect the future requirement for planning authorities to publish their own local design codes, or adopt the national model design code which is due to be published in 2020. The policy should require future proposals to demonstrate accordance with either the locally adopted code or the national model.

Core Policy CP6 - Infrastructure and developer contributions (p.55) (Comment / Support subject to changes)

It is noted that there are no changes proposed to the wording of Policy CP6. However it is critical that the Council ensures that the infrastructure improvements required to deliver the overall strategy are identified clearly and are timetabled so that development can occur without impediment. This is a fundamental requirement of soundness.

The Infrastructure Delivery Plan (IDP) should identify clearly the infrastructure, funding and delivery mechanisms that are needed to support the Local Plan, without transparency regarding the suite of infrastructure improvements that are required, the cost of such improvements and the sources of funding to ensure delivery, there will be uncertainty regarding the effectiveness of the policies within the Local Plan. The draft IDP is not currently available for scrutiny; it is important that the Council provides this detail as a priority to support the robustness of the Plan.

MAKING PLACES - A SPATIAL VISION FOR STROUD DISTRICT

Vision Diagram (p.59) (Support subject to changes)

The extract describing development at the Gloucester Fringe is insufficiently thorough to reflect the strategic significance of this location. The extract should refer also to the strategic housing allocation planned at South Hardwicke and employment growth adjacent to M5 junction 12, which, when considered cumulatively alongside development commitments already being delivered, will establish a balanced strategic scale extension to the Gloucester principal urban area of around 3,700 homes and 27 hectares of employment land. It is vital that the importance of the location is reiterated throughout the Plan to ensure that public funding is directed towards reinforcing the infrastructure network (as required) so that development is facilitated.

Draft vision to 2040 (p.104) (Support subject to changes)

As set out above it is important that the Vision articulates clearly the level of change that is anticipated within this area. It should describe fully the position that will be reached once the development proposals contained within the Plan are realised. As has already been described this should note the scale of existing commitments (1,750 dwellings at Hunts Grove and 13 hectares of employment land at Quedgeley East) and describe these alongside those that are allocated within the

emerging Plan (1,200 dwellings South of Hardwicke, 750 dwellings at the Hunts Grove extension and 14 hectares of employment land at Javelin Park and Quedgeley East).

Policy PS30 - Hunts Grove Extension (p.106) (Support subject to changes)

Crest fully supports the continued allocation of Hunts Grove Extension for 750 dwellings. The draft wording indicates that the policy criteria to be applied to the allocation are yet to be finalised, although the allocation is a continuation of policy SA4 contained within the adopted Local Plan. As a consequence the adopted policy criteria should be carried forward, with the exception of criterion 13, which does not relate to the extension site.

There is no reasonable basis on which to require the provision of a development brief to control delivery of the site; the current policy does not contain any such requirement and it is strongly contended that there is no reason to impose such a requirement now, the imposition of which would add an unnecessary stage to the approval process. It is accepted that a comprehensive masterplan demonstrating how the proposal will be integrated into the main site is justified and this should be maintained.

Policy G1 - South of Hardwicke (p.108) (Comment / Support subject to changes)

The policy should ensure that any access proposals to the site from the A38 are compatible with the approved main site access to the Hunts Grove new community.

CORE POLICIES

Policy DHC5 - Wellbeing and healthy communities (p.159) (Comment / Support subject to changes)

Crest recognises that place making can have a positive impact on the health and wellbeing of communities. However, there is no requirement to provide separate health impact assessments (HIA) for strategic scale schemes and it is considered unnecessary to mandate such for all schemes of this nature. The policy should be re-worded to remove specific reference to HIA, albeit it is appropriate to retain the requirement for proposals to demonstrate how they have been designed to encourage health and wellbeing.

It is unclear how criterion 1 of the policy could meaningfully be satisfied and whether it is realistic to expect all developments of 10 or more dwellings to meet this requirement. While it is understood that the planning process should encourage the promotion of health and wellbeing generally this aspect of the policy is unclear. NPPG (004 ID: 53-004020190722) makes clear that planning can have a role to play in limiting the proliferation of fast-food outlets in particular locations, in close proximity to schools for example, and can support opportunities for communities to access healthier food choices, but this does not reasonably extend to requiring all major proposals to demonstrate how access to healthy, fresh and locally produced food can be achieved. This aspect of the policy should be reworded to require major proposals where feasible to incorporate opportunities for on-site small scale food production through the provision of allotments; edible streets; community orchards etc. (refer to Policy DHC7).

Policy DHC7 - Provision of new open space and built and indoor sports facilities (p.160) (Support subject to changes)

The proposed revisions to the open space requirements set out within policies ES14 and ES 15 of the adopted Local Plan are welcomed; the requirements are clearer than the previous policies and are informed by the latest open space and GI study. However there is an error in the total, which should be 3.92ha/1,000 population, not 3.22 ha/1,000.

With regard to the provision of indoor sports facilities the policy is inappropriately worded insofar as it requires the provision on site (*'new residential development shall be accompanied with'*) of increments of space under four specific categories. The only caveat relating to off-site provision via financial contributions applying to strategic allocations. This implies that non-strategic development must make provision on-site. This is unlikely to be practical.

In any event given that the Council intends to operate a CIL the provision of indoor sports facilities should more appropriately be covered by this, than by on-site provision or specific S106 contributions. To illustrate this point a 25m swimming pool has an area of 300 sqm; which would necessitate a 30,800 person increase in population, equivalent to the delivery of over 13,000 houses (based on average household size in Stroud), which is more than is planned for during the whole of the Plan period. Indoor sports facilities, by their nature, cater for much wider catchments and therefore it is appropriate that their provision should be covered via CIL.

Policy EI12 - Promoting Transport Choice and Accessibility (p.172) (Comment / Support subject to changes)

The provisions within the policy relating to the prioritisation of active travel modes over car use are not consistent with the relevant provisions within the NPPF, as currently expressed. The objective should be to facilitate and encourage the development of sustainable modes of travel that limit their impact on the environment. The policy should be expressed on the basis of encouraging and supporting viable and realistic alternatives to car use through demand management, active travel planning, support for public transport and walking and cycling, rather than specifically setting as a primary objective the reduction of car use. This outcome will naturally be the result of a successful policy framework that supports alternative modes and manages travel demand.

The provision within the policy that requires the use of travel planning to positively address impacts on the highway network as a first response, prior to requiring engineered solutions that increase capacity, is supported. The Council should ensure that this approach to addressing transport infrastructure requirements and accessibility enhancement is pursued throughout the plan-making process and in discussions with the statutory agencies when assessing the scale and requirement for infrastructure reinforcement. In particular this approach should be taken when determining the nature of interventions required at the junctions of the M5 around which development is concentrated within the Local Plan.

Policy DE11 - District-wide mode-specific strategies (p.173) (Support subject to changes)

The wording of DE11 does not present a clear policy, it merely describes what the Council intends to do in pursuit of developing different transport strategies across the district. If required it should be included as supporting text introducing the Council's approach to the promotion of sustainable transport choices.

Policy EI14 - Provision and protection of rail stations and halts (p.174) (Comment/Support subject to changes)

See earlier comments relating to the safeguarding of land at Hunts Grove for the provision of a station facility.

Policy CP14 - High quality sustainable development (pp.178-179) (Support subject to changes)

The final sentence of the policy is not sufficiently clear as to when such documents should be provided in support of proposals; in any case it could be deleted without undermining the purpose or effectiveness of the policy.

Policy ES1 - Sustainable construction and design (p.181)

The draft policy should be consistent with the national policy approach that is set out currently by the Written Ministerial Statement from March 2015, which advises that additional standards over and above Building Regulations, which provide the baseline technical standard for all new homes, should be required only if they address a clearly evidenced locally occurring need, justified by locally specific data and where their impact on viability has been considered. This position is reinforced by NPPG, in particular paragraphs 007 Reference ID: 56-007-20150327; and 020 Reference ID: 56-020-20150327. It is acknowledged that Stroud District Council has an ambition to accelerate the move towards carbon neutrality as a proactive response to climate change. Crest recognises the importance of delivering development that is truly sustainable and appreciates the role that the development industry has to play in this respect. Through the Local Plan formulation process it will be important to ensure that the policies and ambitions that are set out within the Plan are in step with the national agenda and can be fully justified through the examination process. This will necessarily require a full and thorough assessment of the potential impacts on delivery of the Local Plan strategy, the viability of which will be affected by any application of locally specific standards..

Policy ES6 - Providing for biodiversity and geodiversity (p.185)

It should be made clear within the policy whether there is an intention to require a particular quantum of net gain to be achieved, whether this will be a locally derived target, or one reflecting the anticipated national approach, and how any such gain will be measured. It should also be clarified as to what aspects of site design and provision may contribute towards net gain; for example through the provision of natural green space and other forms of informal open space required under DHC7.

Appendix C - Ultra low emissions vehicles (p.209)

There is considered to be a degree of internal inconsistency within the Local Plan insofar as the Council is seeking provision of ULEV charging points for every new dwelling through application of this policy, while actively seeking to discourage the use of cars, elsewhere within the Local Plan, irrespective of fuel source.. Through these representations it is advocated that the approach to policies on transport should be consistent with the NPPF and should not actively discourage the use of any particular mode.

Development Viability of Local Plan Policies (Comments)

In summary it is important that the emerging draft policies contained within the Local Plan have due regard to the need for the document to be positively prepared, justified, effective and consistent with national policy. In every respect there is an overarching requirement set out within the NPPF to ensure that the deliverability of the plan is not undermined through the imposition of policies or obligations that undermine the viability or achievability of the plan strategy. In this regard consistency with national policy is a critical factor in preparing and delivering a Local Plan that is able to effectively deliver sustainable development.

Yours sincerely,

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Partner - Town Planning

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