

**STROUD DISTRICT COUNCIL**  
**ENVIRONMENT COMMITTEE**

**AGENDA  
ITEM NO**

**20 APRIL 2021**

**7**

<b>Report Title</b>	<b>PRE-SUBMISSION DISTRICT LOCAL PLAN</b>			
	To approve a Draft Stroud District Local Plan (Draft Local Plan) for publication in accordance with Regulations 19 and 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012.			
<b>Decision(s)</b>	<p><b>The Committee RECOMMENDS TO COUNCIL that:</b></p> <p>a) The draft Local Plan (appendix A) is approved for publication in accordance with Regulations 19 and 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and subsequently to be submitted to the Secretary of State in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012;</p> <p>b) The public consultation reports (appendices B and C) are approved for publication, and</p> <p>c) The Head of Planning Strategy is delegated authority to make minor map, textual and formatting changes to the draft document before publication.</p>			
<b>Consultation and Feedback</b>	The Draft Local Plan has been through a series of public consultations during 2017, 2018, 2019 and 2020. A consultation report is set out in Appendix B which shows how views have been taken into consideration following the latest consultations in 2019 and 2020. There has been further internal consultation with relevant departments, and discussions held at Planning Review Panel. The Draft Local Plan has been amended to take account of points raised.			
<b>Report Author</b>	Mark Russell, Head of Planning Strategy Email: <a href="mailto:mark.russell@stroud.gov.uk">mark.russell@stroud.gov.uk</a>			
<b>Options</b>	There has been extensive consultation and analysis of alternative development strategies, policy and site options to determine the most appropriate for the District. A range of alternatives has been tested.			
<b>Background Papers</b>	The full evidence base and information on previous Local Plan stages can be found at <a href="http://www.stroud.gov.uk/localplanreview">www.stroud.gov.uk/localplanreview</a>			
<b>Appendices</b>	Appendix A: Pre-Submission Draft Plan April 2021 Appendix B: 2019 Draft Local Plan Consultation Report April 2021 Appendix C: Additional Housing Options Consultation Report April 2021			
<b>Implications (further details at the end of the report)</b>	Financial	Legal	Equality	Environmental
	No	Yes	Yes	Yes

## **1. BACKGROUND AND PROCESS**

- 1.1** Local plans sit at the heart of the national planning system, providing a framework for managing the use of land, to address local housing, employment and other needs whilst conserving and enhancing our local environment.
- 1.2** Council adopted the Stroud District Local Plan in November 2015. The Government expects local planning authorities to review plans regularly and to update them in whole or in part at least every five years. The adopted Local Plan is now more than five years old and the housing requirement set out in the Plan is no longer up-to-date. The Local Plan Review has recently been delayed due to the Covid-19 pandemic and any further delay increases the risks of planning by appeal and further delays due to changes to the planning system included in the Government's 2020 Planning White Paper. The Government's Chief Planning Officer has urged local authorities to continue with plan reviews despite the on-going pandemic and wishes to see all local authorities with an up-to-date Local Plan by 2023.
- 1.3** In September 2017 Committee approved a timetable for the Local Plan Review and approved an Issues and Options paper for public consultation. In October 2018 Committee approved an Emerging Strategy for further public consultation and in October 2019 Committee approved a Draft Local Plan for further public consultation. A final Additional Housing Options document was approved by Committee in October 2020 for public consultation.
- 1.4** Consultation to date has included four series of public consultation, with the first three stages including public exhibitions around the District, meetings with parish councils and key stakeholders and hard to reach groups. The fourth public consultation was undertaken online due to Covid-19 pandemic restrictions. Reports of the Draft Local Plan (2019) and Additional Housing Options (2020) public consultation activities and feedback on comments received are set out in Appendices B and C. Reports on earlier consultation stages can be viewed on the Council's website.
- 1.5** The Council's published timetable for producing the Local Plan is set out in the Council's approved Local Development Scheme. Engagement and consultation has been carried out in accordance with the approved Statement of Community Involvement.
- 1.6** All local plans must be accompanied by a Sustainability Appraisal (SA) of the plan. The purpose of this is to assess the likely social, environmental and economic effects of a plan and to inform the development of the plan. The SA of the Draft Local Plan has been fully integrated into the plan preparation process so that it has informed and influenced the Plan as it has developed. The SA carried out at earlier stages of the process tested each possible alternative strategy, site options and draft policies against a number of sustainability objectives. We have used the results of these tests in deciding the final strategy and the policies and proposals that support it. A pre-submission version of the SA will be published with the Draft Local Plan for formal consultation.
- 1.7** All local plans are required to assess whether any policies or proposals may affect any nature conservation sites of European importance and to suggest ways in which they could be avoided. A Habitat Regulations Assessment (HRA) has been carried out at key stages in the production of the Plan. The Draft Local Plan has been amended to reflect recommendations from the HRA. A pre-submission version of the HRA will be published with the Draft Local Plan for formal consultation.

**1.8** The Council has a duty to co-operate with neighbouring authorities and other prescribed bodies. The Council has commissioned evidence studies jointly with neighbouring authorities and with the County Council, has discussed strategic and cross boundary matters with adjoining authorities on a regular basis and has engaged with other prescribed bodies regarding the content of this draft Local Plan. A Gloucestershire Statement of Common Ground setting out our agreement on strategic planning matters is currently being finalised. Existing agreements are included on the Council's website.

**1.9** The Draft Local Plan is underpinned and informed by a whole range of studies covering local needs, infrastructure requirements, site assessments and viability assessments.

## **2. DRAFT LOCAL PLAN DEVELOPMENT STRATEGY**

**2.1** The Draft Local Plan has a major role to play in helping to tackle the climate and ecological emergency and to deliver on the Council's commitments set out within the recently approved CN 2030 strategy. The Draft Local Plan sets tackling the emergency at the heart of the Plan.

**2.2** The Draft Local Plan identifies the following as priority issues:

- Moving the District towards becoming Carbon Neutral by 2030, whilst adapting to the impacts of climate change and providing resilience for the future;
- Ensuring new development is located in the right place, supported by the right services and infrastructure to create sustainable development; and
- Conserving and enhancing Stroud District's countryside and biodiversity, including maximising the potential for a green infrastructure network across the District

**2.3** To address these issues, the development strategy set out within the Draft Local Plan aims to:

- concentrate housing growth at the main centres of population where there is best access to services, facilities, jobs and infrastructure and at new settlements where there is the potential to create new sustainable communities along garden city principles;
- support the regeneration of the canal corridor through the Stroud valleys and at Berkeley/Sharpness;
- maximise the use of previously developed land by allocating sites and supporting redevelopment within settlement development limits;
- focus strategic employment at accessible locations within the Rail/A38/M5 corridor, at key local market locations and integrated with housing where appropriate;
- support and improve existing services and facilities at smaller towns and larger villages by providing for lesser levels of development in accordance with a settlement hierarchy;
- support the social sustainability of smaller villages by allowing for small scale development provided there is support from local communities;
- prioritise the conservation and enhancement of the natural and scenic beauty of the Cotswolds AONB but support limited housing development to meet needs arising from within the AONB;
- enhance the natural environment wherever possible and protect the quality of the countryside from inappropriate development.

**2.4** A range of alternative development strategy options have been considered and the final strategy is a hybrid of those first proposed. Following public consultation in 2019 we have

looked again at the merits of concentrated growth v dispersal. However, sustainability appraisal and transport assessment work has identified the clear benefits of concentrating most growth in terms of maximising the use of infrastructure and minimising the need to travel. The development strategy does now include an element of dispersal to address local needs, responding to consultees and councillors, however the scale of the housing requirements (i.e. c.8000 additional dwellings) would mean that a pro-rata dispersal strategy would lead to significant growth even at the smallest settlement and unsustainable travel patterns, increasing carbon emissions.

### 3. HOUSING AND EMPLOYMENT REQUIREMENTS AND SUPPLY

**3.1** The minimum number of houses to be provided in the District for the Plan period is set by national Government not by the District Council. The current minimum requirement is 630 homes per annum, or a total of 12,600 for the Plan period. Neither the Gloucestershire Local Housing Needs Assessment (2019) nor the Gloucestershire Economic Needs Assessment (2020) recommend that figures be increased to take account of any other relevant factors. However, the supply needs to ensure sufficient headroom to address any sites not coming forward as planned. Generally, an oversupply of 10-20% is expected, including an allowance for small sites coming forward on unidentified sites (windfall).

**3.2** Table 1 below summarises the housing supply as set out in the Local Plan.

**Table 1: Recommended housing supply**

Existing deliverable permissions (as at 1 April 2020)	4,595
Recommended strategic sites	8,080
Recommended local development sites	985
Small sites allowance (75pa x 17 years)	1,275
<b>Total potential housing supply</b>	<b>14,935</b>
<b>Minimum requirement</b>	<b>12,600</b>
<b>% over minimum requirement</b>	<b>+(18.5%)</b>

**3.3** Employment land minimum requirements are not set by Government, but are dependent upon local studies. The Gloucestershire Economic Needs Assessment (2020) considered a range of scenarios and recommended a net increase in employment land (offices, industrial and storage and distribution) of between 62 and 72 hectares for the Plan period, to reflect the higher growth scenarios in line with the GFirstLEP Draft Industrial Strategy.

**3.4** Table 2 below summarises the employment land supply as set out in the Local Plan.

**Table 2: Recommended employment land supply**

Existing permissions (as at 1 April 2020)	52 ha
Recommended strategic sites	79 ha
Potential losses (average 2.03 ha lost per year since 2006x20)	- 41 ha
<b>Total potential employment supply</b>	<b>90 ha</b>
<b>Higher growth scenarios requirement range</b>	<b>62-72ha</b>

**3.5** The overall position is therefore that we have identified more than sufficient land to meet housing and employment land requirements, with some additional headroom. The supply reflects the available evidence, although uncertainty remains on the longer term impacts of Covid-19 and Brexit on the local economy and accommodation requirements.

## 4. STRATEGIC AND LOCAL DEVELOPMENT SITES

- 4.1 It is essential in producing a sound Local Plan that decisions on the choice of sites are transparent, logical and underpinned by evidence. The assessment of potential sites to meet Local Plan requirements has been rigorous. Promoted sites were assessed initially through the Council's annual Strategic Assessment of Land Availability (SALA) process (2017-2020). Potential sites were subject to public consultation and also put through the Sustainability Appraisal (SA) process. Sites have been selected that perform relatively well through the assessment process and which can deliver the Local Plan development strategy.
- 4.2 Table 3 below sets out the strategic housing and employment sites set out within the Draft Local Plan.

**Table 3: Recommended strategic sites**

Location	Employment (hectares)	Housing (no. dwellings)
Cam North West		900
Cam North East Extension		180
South of Hardwicke		1,350
Hunts Grove Extension		750
Javelin Park	27 ha	
Quedgeley East Extension	5 ha	
Renishaw New Mills	10 ha	
Sharpness Docks	7 ha	300
Sharpness new settlement	10 ha	2,400
Stonehouse North West	5 ha	700
Stonehouse Eco Park	10 ha	
Wisloe new settlement	5 ha	1,500
Small site allocations (total)	-	985
Existing commitments (net)	52 ha	4,595
Potential losses	- 41 ha	
<b>TOTAL SUPPLY</b>	<b>90 ha</b>	<b>13,660</b>
<b>Requirement</b>	<b>62-72 ha</b>	<b>At least 12,600</b>
Windfall allowance		1,275

- 4.3 A range of smaller local development sites are recommended for allocation in the Draft Local Plan. These are located at the Tier 1-Tier 3b towns and larger villages identified within the settlement hierarchy where most jobs, services and facilities are located. A comprehensive review of the role and function of settlements in the District was carried out in 2018 and underpins the Draft Local Plan development strategy.
- 4.4 Gloucester City has identified a shortfall of c.6000 dwellings to meet future housing needs from Gloucester and has asked neighbouring authorities to help meet these unmet needs. To meet our duty to co-operate requirements, a site at Whaddon for up to 3,000 dwellings has been safeguarded as the most appropriate site within the District to help address this shortfall, subject to evidence of need and being in accordance with the Joint Core Strategy (JCS) review. The expectation is that other neighbouring authorities will assist with meeting the shortfall having regard to the results of The Assessment of Strategic Development Opportunities in Parts of Gloucester: Interim Assessment) (2019).

## **5. OTHER POLICIES AND PROPOSALS**

- 5.1** The Draft Local Plan includes a wide range of other policies and proposals which seek to meet the strategic objectives of the Plan and to guide and manage development proposals. Some of the most significant include:

### **Housing and communities**

- Policy DCP2 Supporting older people - New standards for accessible/adaptable homes and providing a range of house types including bungalows;
- Policy CP9 Affordable housing – Requires 30% affordable housing provision on sites of 10+ dwellings in urban areas and 4+ dwellings in rural areas;
- Policy HC4 Local housing need – Support for entry level homes, single plot affordable self and custom built homes on rural exception sites;
- Policy DHC7 Provision of new open space – New standards for development to provide open space and contribute to indoor sports facilities;

### **Economy and infrastructure**

- Policy CP11 Town centres and retailing – Amended retail policy for shopping and other town centre uses to reflect changes to national policy
- Policy EI1 Key employment sites – Updated list of employment sites to be protected for E/B class uses
- Policy EI2 Regenerating existing employment sites – Updated list of employment sites where redevelopment for a mix of uses may be permitted
- Policy EI13 Walking and cycling routes – Proposals for extending the walking and cycling network including community supported greenway projects
- Policy EI14 Rail stations – Support for new station at Stonehouse and the reopening of the Sharpness branch line to passenger services;

### **Environment and surroundings**

- Policy ES1 Sustainable construction – Net zero carbon construction standards and carbon offsetting fund, other design requirements, electric vehicle charging points;
- Policy ES2 Renewable energy – support for renewable energy including solar and wind energy within defined suitable areas;
- Policy DES3 Heat supply – development to provide heat from non-fossil fuel sources: communal low temperature heating systems, using zero carbon renewable heat or ambient or secondary sources and pumps;
- Policy ES6 Local biodiversity – development to provide a minimum of 10% net gain in biodiversity;
- Policy DES2 Green infrastructure – increased requirements for providing green infrastructure to address climate change, biodiversity and recreation;
- Policy ES11 The District's Canals – support for restoration of canals, additional visitor facilities and developer contributions towards future restoration and improvements.

- 5.2** A policies map will be produced showing policy designations and allocated sites on an OS map base. At this stage, a list of consequential map changes to the 2015 Local Plan policies map is identified at the back of the Local Plan in Appendix A.

## **6. NEXT STEPS**

- 6.1** Once approved, the Draft Local Plan will be subject to six weeks of formal public consultation in accordance with Regulations 19 and 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012, commencing at the end of May/early June

2021. Depending upon Covid-19 restrictions at the time, this may be conducted entirely online or may allow for documents to be examined at public deposit points. The Draft Local Plan, together with consultation representations received and supporting documents, will then be submitted to the Planning Inspectorate, anticipated by September 2021.

- 6.2** An appointed Inspector will then examine the Draft Local Plan to determine whether it is a sound plan and can be adopted by the Council, or whether modifications need to be made. The examination process is likely to involve a number of public hearing sessions during 2022 at which objectors to the Plan will be able to propose changes to the Plan.
- 6.3** Depending upon progress with the examination, it is hoped that receipt of a favourable Inspector's Report will allow the Council to adopt the Local Plan by the end of 2022.

## **7. IMPLICATIONS**

### **7.1 Financial Implications**

There are no financial implications arising directly from this report. The adoption of the Local Plan will help to reduce the risk of legal challenge to planning decisions and associated costs to the Council. A final report will be brought to this Committee after the examination process has concluded.

Adele Rudkin, Accountant

Tel: 01453 754109 Email: [adele.rudkin@stroud.gov.uk](mailto:adele.rudkin@stroud.gov.uk)

### **7.2 Legal Implications**

The Council is required to have an up-to-date Local Plan. The Draft Local Plan has been prepared in accordance with the relevant legislative, regulatory and policy framework as explained within the body of this report. This requires that Council resolves to submit parts of its Development Plan to the Secretary of State and that public consultation be undertaken at prescribed stages of its preparation.

Specifically, Section 20 of the Planning and Compulsory Purchase Act 2004 requires that the Council must submit the Draft Local Plan to the Secretary of State for independent examination, having complied with the requirements of The Town and Country Planning (Local Planning) (England) Regulations 2012 ('the Regulations') and being satisfied that the Plan is ready for such examination.

Regulation 22 prescribes the documents which must accompany the Plan when it is submitted to the Secretary of State. These include the sustainability appraisal report (SA), a statement of the consultation responses received under Regulation 18 and how these were taken into account and a statement of the consultation responses received under Regulation 20.

Regulation 22 also prescribes the publicity requirements once the Plan has been submitted for examination.

The examination will determine whether the Plan:

- is sound (i.e. is positively prepared, justified, effective and consistent with national policy);
- is legally compliant;
- satisfies the legal duty of cooperate;
- requires modification.

### **7.3 Equality Implications**

The Draft Local Plan has been subject to Sustainability Appraisal (SA) during its preparation which has included assessing the contents against the objective of encouraging social inclusion, equity, the promotion of equality and a respect for diversity. The Draft Local Plan has taken account of any SA recommendations during its production. A submission version of the SA will be taken into account at examination.

### **7.4 Environmental Implications**

The Draft Local Plan has been subject to Sustainability Appraisal (SA) during its preparation which has included assessing the contents against a range of environmental objectives. The Draft Local Plan has taken account of any SA recommendations during its production. A submission version of the SA will be taken into account at examination.