



Stroud District Local Plan Review

**Draft Plan for Consultation
November 2019 Consultation Report**

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Planning
for our future



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1. Introduction

- 1.1 In November 2019 Stroud District Council consulted on its Draft Plan as part of the Local Plan Review. This report provides an overview of the Draft Plan public consultation including quantitative analysis and summaries of public comments submitted in response to the Draft Plan Public Consultation November 2019. A Council response to issues raised details how comments have been taken into account in the Pre-submission Plan.
- 1.2 Further focussed consultation on Additional Housing Options was carried out in October 2020, in response to proposed changes to the way the Government calculates the minimum housing requirement for each local authority area in the country and a potential need for additional land within the District for housing. A separate report analysing responses to the Additional Housing Options consultation is available to view on the Council's website at www.stroud.gov.uk/localplanreview



2. Draft Plan Consultation

Stroud District Local Plan Review

- 2.1 The Council started the process of reviewing the current Local Plan in 2017 with an Issues and Options consultation stage, followed by an Emerging Strategy consultation in 2018. Full details of previous consultation stages and accompanying reports on the main findings are available to view on the Council's website at www.stroud.gov.uk/localplanreview

Consultation document

- 2.2 Comments from consultation on the Emerging Strategy Paper helped inform the Draft Plan for Consultation which was published in November 2019. The document sets out the Council's preferred development strategy for meeting the District's needs for the plan period to 2040, the spatial vision for each of the eight parish cluster distinct parts of the District identified in the adopted Local Plan and policies for protecting and conserving the natural and built environment.
- 2.3 The paper was made available in hard copy to view at the 24 deposit point locations throughout the District, including Stroud District Council offices at Ebley Mill, town and parish council offices open to the public and public libraries.
- 2.4 The paper was published on the Council's website, www.stroud.gov.uk/localplanreview along with links to a range of background information and relevant online resources.
- 2.5 Public consultation on the Draft Plan took place over a period of nine weeks from 20th November 2019 until 22nd January 2020.

Making representations

- 2.6 Feedback on the Draft Plan was invited across a range of formats:
- By online questionnaire
 - Policies questionnaire
 - Sites questionnaire
 - Other sections questionnaire
 - By email
 - By letter
 - An online call for sites: site submission form



- 2.7 The online questionnaire comprised three short questionnaires seeking comments on distinct sections of the Draft Plan. The questionnaire was designed to make it easier to respond to the consultation online, in response to feedback from the Emerging Strategy consultation.

Publicity and notification

- 2.8 Advance publicity of the forthcoming public consultation was included in the SDC News; the Council's annual newsletter sent to every household in the District in September 2019.
- 2.9 The nine-week consultation was advertised in the local press in November 2019 and was also the subject of additional media coverage online and in print. Social media publicity of the Draft Plan press release achieved a reach of 5,000+ on Facebook.
- 2.10 Posters and leaflets were sent to all town and parish councils and deposit point libraries to give local publicity to the consultation and associated public exhibitions.
- 2.11 Email notification was sent to all statutory consultees, together with interest groups, local organisations, businesses, land agents, developers and local residents signed up to the Planning Strategy consultation database to be kept informed of the Local Plan process.

Public engagement

- 2.12 In line with the Council's Statement of Community Involvement (SCI) and previous consultation stages, a wide variety of methods were used to promote the consultation and engage with interested parties:

Public exhibitions

- 2.13 Eleven public exhibitions were held around the District during December 2019 and early January 2020, the first half of the 9-week consultation period. Events were located in town and parish offices or community halls and were held on weekdays (during the day and early evenings) and Saturdays to provide a variety of opportunities to attend. The exhibitions were designed for people to drop-in and read more about the Local Plan Review process, talk to officers and also to informally feed-back their views. Promoters of proposed strategic Draft Plan allocation sites were also invited to be part of the exhibition events, display promotional material and provide representatives to discuss their site proposals with people on the day.



2.14 Table 1 below lists the date, time and location of the 11 public exhibitions.

Date	Time	Venue	No. of people
Monday 02/12/2019	14:00 – 18:00	Brookthorpe Village Hall	26
Tuesday 03/12/2019	14:00 – 18:00	Stroud Sub Rooms	55
Wednesday 04/12/2019	14:00 – 18:00	Stonehouse Pavilion, Oldends Lane	13
Friday 06/12/2019	14:00 – 18:30	Cam Parish Hall	38
Saturday 07/12/2019	09:30 – 12:30	Cam Parish Hall	33
Tuesday 10/12/2019	14:00 – 19:00	Hardwicke Village Hall	41
Friday 13/12/2019	14:00 – 18:30	Sharpness Village Hall	51
Saturday 14/12/2019	09:30 – 12:30	Sharpness Village Hall	70
Monday 16/12/2019	14:00 – 18:30	Slimbridge Village Hall	71
Tuesday 17/12/2019	09:30 – 12:30	Slimbridge Village Hall	27
Saturday 11/01/2020	12:00 – 16:00	Berkeley Town Hall	229
Total attendance			654

Table 1: List of public exhibitions

- 2.15 Printed panels were set up at each exhibition, detailing the preferred development strategy and the spatial vision for each parish cluster area in response to local priorities, issues and needs. These were interspersed with interactive activities for people to leave comments on post-it notes. In response to a request from a member of the public, PDFs of the exhibition board content were published on the Council's Stroud District Local Plan Review pages for reference. Laptop computers were available at each venue with Wi-Fi capability for officers to provide guidance on completing the online consultation questionnaire and to show how to access supporting evidence base documents and resources.
- 2.16 Comment forms and site maps of proposed strategic sites were provided at each venue for people to record and submit their informal views. An additional map based activity was available seeking feedback on preferred broad locations in the District for tree planting, wind and solar power development in support of Stroud District Council's pledge and overarching priority of the Draft Plan to become carbon neutral by 2030.

Social media

- 2.17 A continued social media presence, to promote public engagement throughout the nine-week consultation period, included:
- Facebook diary dates for each of the public exhibitions, achieving a reach of 8,000 on Facebook;
 - Twitter, published #Stroud2040 content, highlighting specific elements of the Draft Plan and particular issues relevant to public exhibitions, achieving 10,000 impressions on Twitter.



Stakeholder meetings

- 2.18 At each stage of the consultation process to date the Council arranged individual meetings with a range of statutory consultees and other public bodies to brief them on the Local Plan review process and encourage their engagement. At the Draft Plan stage the Council met with the following:

Association of Severn Estuary Relevant Authorities (ASERA)
Council for the Protection of Rural England (CPRE)
Gloucestershire County Council (GCC)
Gloucestershire Transport Group
Highways England
Gloucestershire Local Authorities
Gloucestershire Severn Estuary Stakeholders Group
Kingswood Parish Council
Kingswood Primary School/ KLB School/ Gloucestershire Education
Local Authority Planning and Biodiversity Group
Local Nature Partnership (LNP)
Severn Estuary Coastal Group
South Gloucestershire Council
Stroud Building, Design and Architecture (BDA)

Health Impact Assessment (HIA)

- 2.19 A workshop was held on 16th January 2020 with Gloucestershire County Council Public Health to pilot Health Impact Assessment of the Draft Plan and its policies as part of developing a toolkit for wider use across Gloucestershire to support the creation of healthy communities at the plan making stage. The findings from the workshop have been included as part of the evidence base for the Draft Plan available to view on the Council's website at www.stroud.gov.uk/localplanreview

Other groups

- 2.20 Earlier stages in the Local Plan Review focused on engaging with young people in the District, working with Stroud District Youth Council and secondary school pupils at Katharine Lady Berkeley (KLB) and Rednock Schools. As part of the Draft Plan consultation, opportunities were investigated to work with health and well-being groups providing support in local communities to identify wider community needs and opportunities to be addressed in the new Local Plan.
- 2.21 Officers attended the Know Your Patch (Stroud) Network Partnership meeting at Forest Green Rovers conference facility on 30th January 2020 to promote the Draft Plan public consultation amongst Adult Social Care front line services and voluntary sector organisations.
- 2.22 A Planning for Inclusive Communities Workshop was held on 5th February 2020 with invited representatives from health and community groups working in the District. The session focused on



understanding the health and well-being needs of the District's local communities and identifying opportunities for creating integrated, successful communities. Group discussion and a facilitated exercise explored how to improve accessibility, create social interaction and promote physical and mental health and well-being in the design and layout of new strategic development, community facilities and Green Infrastructure.

- 2.23 Officers also met with local community groups including BaSRAG (Berkeley and Sharpness Residents Action Group) and WAG (Wisloe Action Group).



3. Key findings

Level of response

3.1 In total, 868 respondents submitted their comments on the Draft Plan consultation. Responses were received from a variety of stakeholders including individuals, town and parish councils, statutory and non-statutory organisations, landowners and developers and local community groups. The majority (80%) of responses submitted were made by individuals. The full breakdown is shown below in Figure 1.

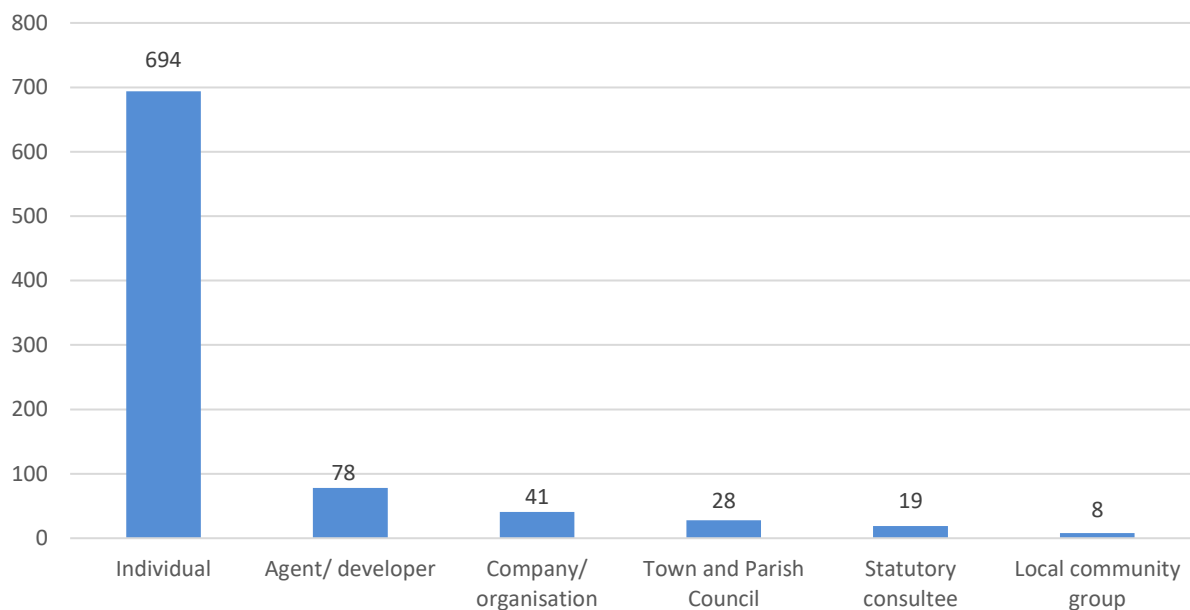


Figure 1: Type of response

3.2 Representations were received from 19 statutory consultees:

Canal and River Trust	Natural England
Cotswold District Council	Network Rail
Department of Education	NHS Property Services Ltd
Environment Agency	Nuclear Decommissioning Authority
Forest of Dean District Council	Severn Trent Water
Gloucestershire County Council	South Worcestershire Councils
Gloucestershire Joint Core Strategy (JCS) authorities	South Gloucestershire Council
Highways England	Sports England
Historic England	Wales & West Utilities Ltd
National Grid	



Representations were received from 28 town and parish councils:

Alkington Parish Council	Minchinhampton Parish Council
Bisley with Lypiatt Parish Council	Nailsworth Town Council
Brookthorpe Parish Council	North Nibley Parish Council
Cam Parish Council	Painswick Town Council
Chalford Parish Council	Rodborough Parish Council
Dursley Town Council	Slimbridge Parish Council
Eastington Parish Council	Standish Parish Council
Frampton Parish Council	Stonehouse Town Council
Ham & Stone Parish Council	Stroud Town Council
Hamfallow Parish Council	Uley Parish Council
Hardwicke Parish Council	Upton St Leonards Parish Council
Horsley Parish Council	Whiteshill & Ruscombe Parish Council
Kingswood Parish Council	Woodchester Parish Council
Leonard Stanley Parish Council	Wotton under Edge Town Council

- 3.3 Representations were received from 821 agents, developers, companies, organisations, local community groups and individuals.

Method of response

- 3.4 The submitted responses and comments were received in a variety of formats including three separate online questionnaires (Policies, Sites and Other sections), by email and by letter. In total 1,002 responses were received which includes respondents submitting comments to more than one online questionnaire and/ or choosing to reply by email and online. The figures do not take into account comments written on post-it notes at the public exhibition events. A full breakdown of responses can be seen in Table 2 below:

Method	No. of responses	Percent
Online 'Policies' questionnaire	72	7%
Online 'Sites' questionnaire	307	31%
Online 'Other sections' questionnaire	31	3%
email	521	52%
Letter	71	7%
Total	1002	100%

Table 2: Number of responses by method

- 3.5 Of the 1,002 responses; 52% were sent by email, 31% were submitted via the online 'Sites' questionnaire, 7% via the online 'Policies' questionnaire, 3% via the online 'Other sections' questionnaire and 7% by letter.
- 3.6 In addition to the 1,002 responses above, the Council received 19 valid forms via the online site submission portal. Any new sites, not previously assessed as part of the Strategic Assessment of Land Availability (SALA), together with new sites identified from other consultation responses, have been assessed as part of the SALA 2020 New Sites Update Report October 2020.



Key findings

Core Policies

- 3.7 The six 'Core Policies' in chapter 2.8 sit at the heart of the Plan. They are the principal means of defining and delivering the Draft Plan's proposed development strategy. Additional core policies relating to Homes and communities, Economy and infrastructure and Our environment and surroundings are analysed from 3.14 – 3.25 below.

Core Policies	Support		Object	
	Number	%*	Number	%*
DCP1 (new) - Delivering Carbon Neutral by 2030	92	94%	6	6%
CP2 - Strategic growth and development locations	57	55%	47	45%
CP3 - A hierarchy for growth and development across the District's settlements	61	82%	13	18%
CP4 - Place Making	43	83%	9	17%
CP5 - Environmental development principles for strategic sites	57	92%	5	8%
CP6 - Infrastructure and developer contributions	45	92%	4	8%

*percentage of response to question

Table 3: Level of support for core policies

- 3.8 In the Draft Local Plan consultation, we asked whether you supported the six core policies. The results are displayed in Table 4 and show considerable support (94%) for the new core policy for delivering Carbon Neutral by 2030, ahead of the Government target of net Zero Carbon 2050. How we plan for future built development and the patterns of movement generated will play a significant part in targets to reduce future carbon emissions.
- 3.9 Core Policy CP5 seeks to ensure that development at the strategic sites will meet the highest standards of energy efficiency; will incorporate on-site renewable and low-carbon energy technologies; will reduce the volume of waste going to landfill; and will mitigate against climate change. 92% of those who submitted a response to this question, supported the policy.
- 3.10 In order to create sustainable communities, the Council wishes to ensure that the necessary infrastructure is put in place to address community needs and ensure that transport improvements take place to address the traffic and travel consequences of new development. 92% of those who submitted a response to this question, supported the policy.
- 3.11 The Local Plan will meet the objectively assessed needs of the District by providing for the development of housing, employment, retail and other necessary development for the period 2020 – 2040. Core Policy CP2 sets out the strategic growth and development locations. 55% of those who submitted a response to this question supported the policy and 45% opposed.
- 3.12 Figure 2 illustrates the percentage of responses to the question which supported each Core Policy.



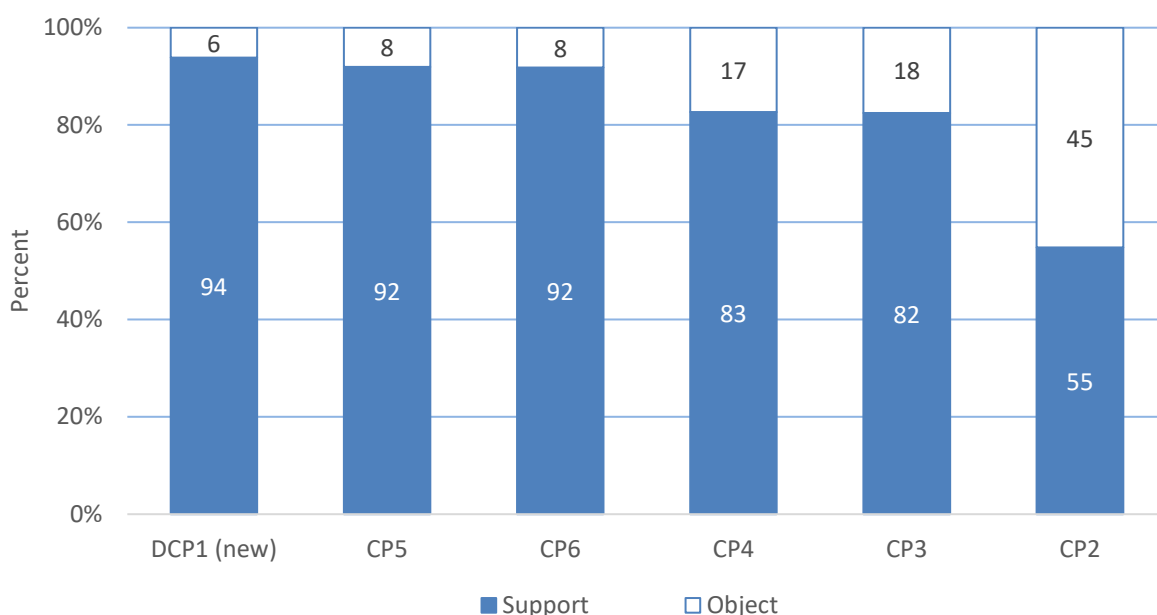


Figure 2: Percentage of responses supporting the six 'Core Policies'

- 3.13 All comments received on the six core policies have been read and **Section 4** of this report provides a summary of the key points raised and also details a Council response highlighting any changes proposed to the policies and supporting text.

Homes and communities policies

- 3.14 The homes and communities core policies and delivery policies within the Local Plan aim to deliver the District's housing target with a range of dwelling sizes, types and tenures, deliver more affordable homes and achieve mixed and balanced places, which have access to services and amenities that meet local needs and help build sustainable communities. In the Draft Local Plan consultation, we asked whether you supported these policies. The results are displayed in Table 4.

Home and communities policies	Support		Object	
	Number	Percent*	Number	Percent*
CP7 - Lifetime communities	45	94	3	6
CP8 - New housing development	52	93	4	7
CP9 - Affordable housing	51	86	8	14
CP10 - Gypsy, Traveller and Travelling Showpeople Sites	35	80	9	20
DCP2 (new) - Supporting Older People	55	98	1	2
DHC1 (new) - Meeting housing need within defined settlements	40	82	9	18
DHC2 (new) - Sustainable rural communities	49	89	6	11
DHC3 (new) - Live-work development	44	88	6	12
DHC4 (new) - Community-led housing	47	90	5	10
DHC5 (new) - Wellbeing and healthy communities	49	92	4	8
DHC6 (new) - Protection of existing open spaces and built and indoor sports facilities	50	94	3	6



DHC7 (new) - Provision of new open space and built and indoor sports facilities	45	92	4	8
HC1 - Detailed criteria for new housing development	37	86	6	14
HC2 - Providing new homes above shops in our town centres	44	94	3	6
HC3 - Self-build and custom build housing provision	46	81	11	19
HC4 - Local housing need (exception sites)	37	77	11	23
HC5 - Replacement dwellings	43	93	3	7
HC6 - Residential sub-division of dwellings	35	90	4	10
HC7 - Annexes for dependents or carers	39	98	1	3
HC8 - Extensions to dwellings	41	95	2	5

* percentage of response to question

Table 4: Level of support for Homes and communities policies

3.15 There was overall support for all existing and new housing and communities core policies and delivery policies. There was greatest support (98%) for a new policy DCP2, designed to support older people. Stroud District has an ageing population; the number of people aged 65 and over is estimated to increase by 12,227 over the Plan period. As the population ages, the occurrence of long-term health conditions is likely to increase, creating complex geographies of need and demand on various services. The prevalence of specific conditions, including physical disabilities, sensory impairments and dementia can trigger the need for specific types of housing. 98% supported policy HC7 - annexes for dependents or carers, which sets criteria for the conversion of an existing outbuilding within the curtilage of a dwelling house to a self-contained annexe.

3.16 Figure 3 illustrates the percent of people who answered the question who supported each homes and communities Core Policy and Delivery Policy.

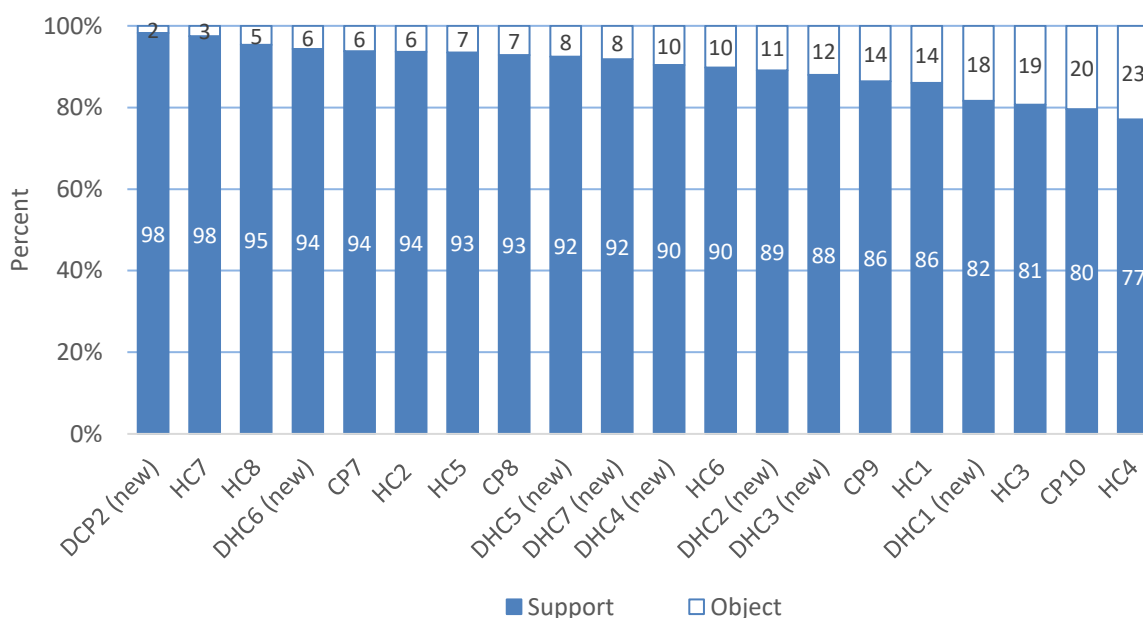


Figure 3: Percentage of responses supporting Homes and communities policies

- 3.17 All comments received on the homes and communities policies have been read and **Section 4** of this report provides a summary of the key points raised and also details a Council response highlighting any changes proposed to the policies and supporting text.

Economy and infrastructure policies

- 3.18 The economy and infrastructure core policies and delivery policies within the Local Plan aim to support economic growth by delivering a range and mix of employment uses, sites and types in the most appropriate location for the particular use, supported by and integrated with housing and other community infrastructure. In the Draft Local Plan consultation, we asked whether you supported these policies. The results are displayed in Table 5.

Economy and infrastructure policies	Support		Object	
	Number	%*	Number	%*
CP11 - New employment development	41	95	2	5
CP12 - Town centres and retailing	32	89	4	11
CP13 - Demand management and sustainable travel measures	42	93	3	7
EI1 - Key employment sites	34	94	2	6
EI2 - Regenerating existing employment sites	35	92	3	8
EI2a - Former Berkeley Power Station	31	91	3	9
EI4 - Development at existing employment sites in the countryside	30	88	4	12
EI5 - Farm and forestry enterprise diversification	32	86	5	14
EI6 - Protecting individual and village shops, public houses and other community uses	41	95	2	5
EI7 - Non-retail uses in primary frontages	28	85	5	15
EI8 - Non-retail uses in secondary frontages	30	91	3	9
EI9 - Floorspace thresholds for Retail Impact Assessments	28	90	3	10
EI10 - Provision of new tourism opportunities	36	90	4	10
EI11 - Providing sport, leisure, recreation and cultural facilities	38	95	2	5
EI12 - Promoting transport choice and accessibility	60	94	4	6
EI14 - Provision and protection of rail stations and halts	44	94	3	6
EI15 - Protection of freight facilities at Sharpness Docks	33	97	1	3
EI16 - Provision of public transport facilities	40	95	2	5
DEI1 (new) - District-wide mode-specific strategies	52	95	3	5

* percentage of response to question

Table 5: Level of support for Economy and infrastructure policies

- 3.19 There was overall support for all existing and new economy and infrastructure core policies and delivery policies. There was greatest support (97%) for Delivery Policy EI15 - Protection of freight facilities at Sharpness Docks. Stroud District includes significant port facilities at Sharpness Docks and to support the new vision for Sharpness Docks, the Council will continue to support the regeneration and rejuvenation of Sharpness Docks south of the lower swing bridge for dock related freight uses.



3.20 Figure 4 illustrates the percent of people who answered the question who supported each economy and infrastructure core policy and delivery policy.

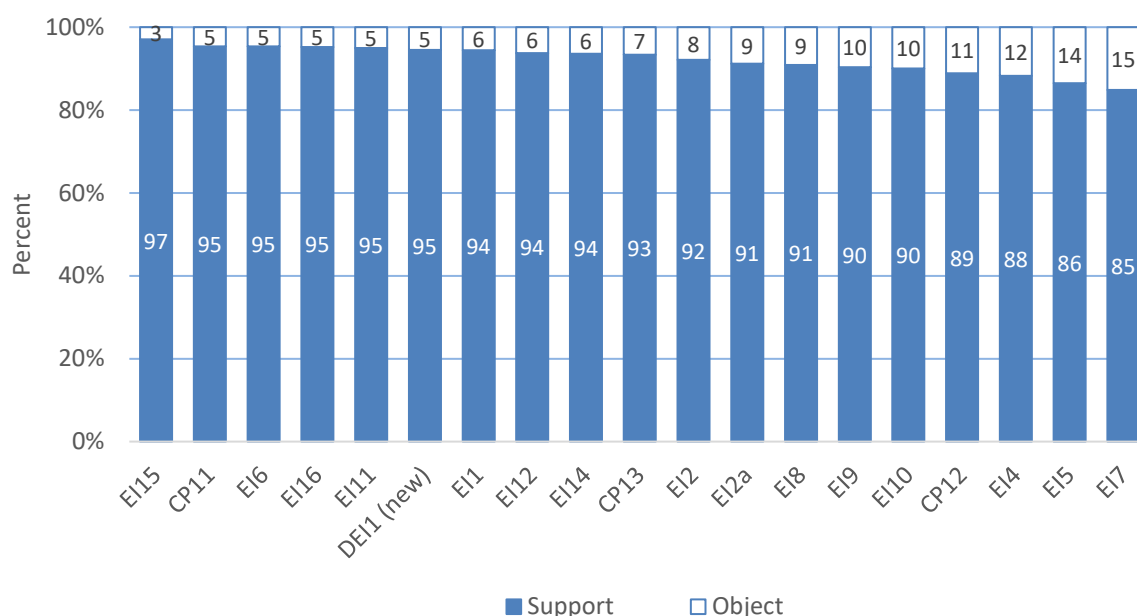


Figure 4: Percentage of responses supporting Economy and infrastructure policies

3.21 All comments received on the economy and infrastructure policies have been read and **Section 4** of this report provides a summary of the key points raised and also details a Council response highlighting any changes proposed to the policies and supporting text.

Our environment and surroundings policies

3.22 The environment and surroundings core policies and delivery policies within the Local Plan aim to move the District towards becoming Carbon Neutral by 2030, adapting to the effects of climate change and providing resilience for the future, whilst ensuring that development protects, conserves or enhances our local environment. In the Draft Local Plan consultation, we asked whether you supported these policies. The results are displayed in Table 6.

Our environment and surroundings policies	Support		Object	
	Number	%*	Number	%*
CP14 - High quality sustainable development	56	93	4	7
CP15 - A quality living and working countryside	49	94	3	6
DES1 (new) - Conversion of redundant agricultural or forestry buildings	41	93	3	7
DES2 (new) - Green Infrastructure	54	95	3	5
DES3 (new) - Heat supply	48	91	5	9
ES1 - Sustainable construction and design	62	93	5	7
ES2 - Renewable or low carbon energy generation	58	95	3	5
ES3 - Maintaining quality of life within our environmental limits	47	92	4	8
ES4 - Water resources, quality and flood risk	50	94	3	6



ES5 - Air quality	42	91	4	9
ES6 - Providing for biodiversity and geodiversity	50	96	2	4
ES7 - Landscape character	47	92	4	8
ES8 - Trees, hedgerows and woodlands	47	96	2	4
ES9 - Equestrian development	31	79	8	21
ES10 - Valuing our historic environment and assets	44	98	1	2
ES11 - Maintaining, restoring and regenerating the District's canals	45	94	3	6
ES12 - Better design of places	40	93	3	7
ES16 - Public art contributions	34	87	5	13
CP14 - High quality sustainable development	56	93	4	7
CP15 - A quality living and working countryside	49	94	3	6

* percentage of response to question

Table 6: Level of support for Our environment and surroundings policies

3.23 The results showed that protecting, conserving or enhancing our local environment through the range of core policies and delivery policies within the Local Plan is highly supported, with more than 90% support for all but two of the policies (ES9 - equestrian and ES16 public art). The greatest support (98%) was for delivery policy ES10 which sets principles to preserve, protect or enhance Stroud District's historic environment. The historic environment is important for its own sake. It is also central to the character and identity of the District. It is a source of immense local pride, as well as being a valuable educational and economic resource.

3.24 Figure 5 illustrates the percent of people who answered the question who supported each environment and surroundings Core Policy and Delivery Policy.

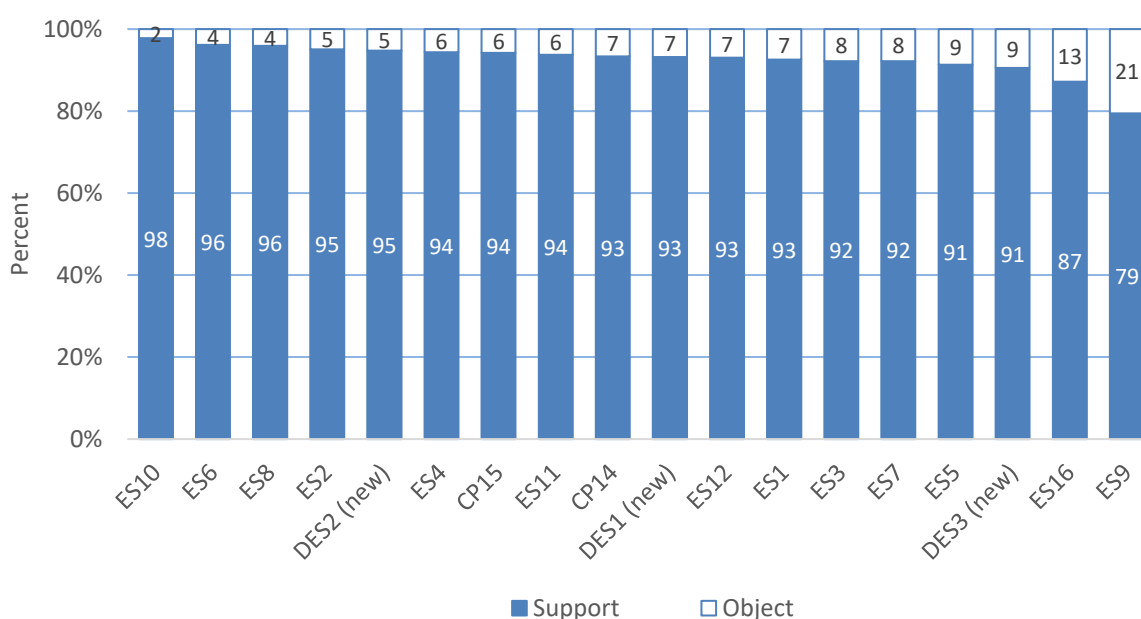


Figure 5: Percentage of responses supporting Our environment and surroundings policies

- 3.25 All comments received on the environment and surroundings policies have been read and **Section 4** of this report provides a summary of the key points raised and also details a Council response highlighting any changes proposed to the policies and supporting text.

Proposed site allocations

- 3.26 The Local Plan's development strategy will distribute at least 12,600 additional dwellings and 73 hectares of new employment land to meet needs for the next 20 years. Section 3 Making Places of the Draft Local Plan sets out the proposed development strategy for each of the District's distinct parish clusters and lists potential site allocations. The consultation provided an opportunity for you to state whether you supported or opposed the proposed housing and employment site allocations. The results are displayed in the tables below.

The Stroud Valleys

- 3.27 Table 7 shows the level of support for the nine potential site allocations in the Stroud Valleys. There was overall support for the potential site allocations in the Stroud Valley, with between 73% and 89% of respondents who submitted their response to each site, supporting it. The sites with most support were the brownfield sites with potential, with the redevelopment of PS11 Merrywalks Arches for housing and town centre uses being the most supported site (89%). The three least supported sites were the two greenfield housing sites; PS05 East of Tobacconist Road Minchinhampton and PS07 North of Nypmsfield Road, Nailsworth and the re-development of Forest Green Football club at PS06 The New Lawn, Nailsworth.

Proposed site allocations	Support		Object	
	Number	%*	Number	%*
PS01 - Brimscombe Mill	38	81	9	19
PS02 Brimscombe Port	37	86	6	14
PS05 East of Tobacconist Road, Minchinhampton	36	73	13	27
PS06 The New Lawn, Nailsworth	34	74	12	26
PS07 North of Nypmsfield Road	33	73	12	27
PS10 Railway land / car parks, Cheapside	41	87	6	13
PS11 Merrywalks Arches, Merrywalks	40	89	5	11
PS12 Police station / Magistrates court, Parliament Street	41	87	6	13
PS13 Central river / canal corridor	36	86	6	14

* percentage of response to question

Table 7: Level of support for potential site allocations in the Stroud Valleys

- 3.28 All comments submitted on sites within the Stroud Valley have been read and **Section 5** of this report provides a summary of the key points raised and also details a response from the Council highlighting whether the site is considered appropriate for allocation in the Local Plan.



The Stonehouse Cluster

- 3.29 Five sites were listed in the Draft Local Plan consultation as potential site allocations for development in the Stonehouse Cluster. Table 8 details the number of people who responded to the consultation stating their view on these sites. There was general support for PS19, a greenfield site north west of Stonehouse (86% support), PS17, Magpies site, a small brownfield development (84% support) and PS20, a strategic mixed use development including employment, sports stadium, canal and open space uses (75% support). The two greenfield sites in Leonard Stanley received lower levels of support with just over half of number of people who responded, supporting development.

Proposed site allocations	Support		Object	
	Number	%*	Number	%*
PS16 South of Leonard Stanley Primary School	29	56	23	44
PS17 Magpies site, Oldends Lane, Stonehouse	37	84	7	16
PS19 Northwest of Stonehouse	44	86	7	14
PS20 M5 Junction 13	45	75	15	25
PS42 Land off Dozule Close, Leonard Stanley	30	57	23	43

* percentage of response to question

Table 8: Level of support for potential site allocations in the Stonehouse Cluster

- 3.30 All comments submitted on sites within the Stonehouse Cluster have been read and **Section 5** of this report provides a summary of the key points raised and also details a response from the Council highlighting whether the site is considered appropriate for allocation in the Local Plan

Cam & Dursley Cluster

- 3.31 Five sites were listed in the Draft Local Plan consultation as potential site allocations for development in the Cam & Dursley Cluster. Table 9 details the number of people who responded to the consultation stating their view on these sites. PS27 1-25 Long Street and PS28 Land off Prospect Place were both identified for development comprising housing and town centre uses and were supported by 78% and 79% respectively. The three greenfield sites in Cam received support of between 62% and 69%.

Proposed site allocations	Support		Object	
	Number	%*	Number	%*
PS21 Land adjacent to Tiltdown House, Cam	40	69	18	31
PS24 West of Draycott, Cam	41	62	25	38
PS25 East of River Cam	40	63	24	38
PS27 1-25 Long Street, Dursley	38	78	11	22
PS28 Land off Prospect Place, Dursley	38	79	10	21

* percentage of response to question

Table 9: Level of support for potential site allocations in the Cam & Dursley Cluster



- 3.32 All comments submitted on sites within the Cam & Dursley Cluster have been read and **Section 5** of this report provides a summary of the key points raised and also details a response from the Council highlighting whether the site is considered appropriate for allocation in the Local Plan

The Gloucester Fringe

- 3.33 Five sites were listed in the Draft Local Plan consultation as potential site allocations for development in the Gloucester Fringe. Table 10 details the number of people who responded to the consultation stating their view on these sites. The two proposed employment allocations at PS32 South of M5 / J12 and PS43 Javelin Park received support from 83% and 87% (respectively) of those who gave their views. G1 South of Hardwicke and G2 Land at Whaddon were listed in the Draft Local Plan as potential sites to meet Gloucester's long term housing needs. 46 people (75% of the 61 people who commented) supported G1 and 46 (78% of the 59 people who commented) supported G2.

Proposed site allocations	Support		Object	
	Number	%*	Number	%*
PS30 Hunts Grove extension	41	85	7	15
PS32 South of M5 / J12 (employment uses)	39	83	8	17
PS43 Javelin Park (employment uses)	40	87	6	13
G1 South of Hardwicke	46	75	15	25
G2 Land at Whaddon	46	78	13	22

* percentage of response to question

Table 10: Level of support for potential site allocations in the Gloucester Fringe

- 3.34 All comments submitted on sites within the Gloucester Fringe have been read and **Section 5** of this report provides a summary of the key points raised and also details a response from the Council highlighting whether the site is considered appropriate for allocation in the Local Plan.

The Berkeley Cluster

- 3.35 Five sites were listed in the Draft Local Plan consultation as potential site allocations for development in the Berkeley Cluster. Table 11 details the number of people who responded to the consultation stating their view on these sites and shows that the total number of responses submitted on the Berkeley Cluster sites was considerably higher than in any of the other seven clusters. There was an overall objection to the five sites with particularly high levels shown against the two proposed new settlements at PS36 New settlement in Sharpness, where 275 (88%) of the 314 people who responded, objected and PS37 new settlement at Wisloe, where 241 of the 279 (86%) objected.



Proposed site allocations	Support		Object	
	Number	%*	Number	%*
PS33 Northwest of Berkeley	61	34	119	66
PS34 Sharpness Docks	63	32	132	68
PS35 Land at Focus School, Wanswell	58	34	113	66
PS36 New settlement at Sharpness	39	12	275	88
PS37 New settlement at Wisloe	38	14	241	86

* percentage of response to question

Table 11: Level of support for potential site allocations in the Berkeley Cluster

- 3.36 All comments submitted on sites within the Berkeley have been read and **Section 5** of this report provides a summary of the key points raised and also details a response from the Council highlighting whether the site is considered appropriate for allocation in the Local Plan.

The Severn Vale

- 3.37 Three sites were listed in the Draft Local Plan consultation as potential site allocations for housing development in the Severn Vale Cluster. Table 12 details the number of people who responded to the consultation stating their view on these sites and shows the most supported sites were PS46 Land west of School Lane, Whitminster (84%) and PS45 Land west of Upton's Gardens, Whitminster (83%). PS44 Northwest of Whitminster Lane was the site with the most objections as a number and percent.

Proposed site allocations	Support		Object	
	Number	%*	Number	%*
PS44 Northwest of Whitminster Lane	33	73	12	27
PS45 Land west of Upton's Gardens, Whitminster	33	83	7	18
PS46 Land west of School Lane, Whitminster	32	84	6	16

* percentage of response to question

Table 12: Level of support for potential site allocations in the Severn Vale

- 3.38 All comments submitted on sites within the Severn Vale have been read and **Section 5** of this report provides a summary of the key points raised and also details a response from the Council highlighting whether the site is considered appropriate for allocation in the Local Plan.

The Wotton Cluster

- 3.39 Two sites were listed in the Draft Local Plan consultation as potential site allocations in the Wotton Cluster. Table 13 shows that 46 people responded to the consultation stating their view on housing development and associated community and open space use on PS38 South of Wickwar Road, Kingswood and 32 (70%) supported and 14 (30%) objected. 46 people responded to the consultation stating they view on the extension of Renishaw New Mills (PS47) for new employment development and 36 (78%) supported and 10 (22%) objected.



Proposed site allocations	Support		Object	
	Number	%*	Number	%*
PS38 South of Wickwar Road, Kingswood	32	70	14	30
PS47 Land west of Renishaw New Mills (employment use)	36	78	10	22

* percentage of response to question

Table 13: Level of support for potential site allocations in the Wotton Cluster

- 3.40 All comments submitted on sites within the Wotton Cluster have been read and **Section 5** of this report provides a summary of the key points raised and also details a response from the Council highlighting whether the site is considered appropriate for allocation in the Local Plan

The Cotswold Cluster

- 3.41 PS41 Washwell fields was the only proposed site allocation within the Cotswold Cluster in the Draft Local Plan. Table 14 shows that from the 83 people who responded to the consultation stating whether they support or object to development on the site, 30 (36%) supported and 53 (64%) objected.

Proposed site allocations	Support		Object	
	Number	%*	Number	%*
PS41 Washwell Fields, Painswick	30	36	53	64

* percentage of response to question

Table 14: Level of support for potential site allocations in the Cotswold Cluster

- 3.42 All comments submitted on PS41 Washwell Fields have been read and **Section 5** of this report provides a summary of the key points raised and also details a response from the Council highlighting whether the site is considered appropriate for allocation in the Local Plan

Other sections of the Draft Plan

- 3.43 The Draft Plan consultation provided an opportunity to comment on other sections of the Draft Plan. Table 15 below details the response.

Section of the Draft Plan	Support		Object	
	Number	%*	Number	%*
1.1 Our District's issues, challenges and needs	35	92	3	8
2.1 Stroud District tomorrow - a vision for the future	21	95	1	5
2.2 Strategic Objectives for the future	32	94	2	6
2.3 An introduction to the development strategy	31	84	6	16
2.4 Our towns and villages	15	83	3	17
2.5 Housing	17	81	4	19
2.6 Local economy and jobs	13	81	3	19
2.7 Our town centres	19	95	1	5
2.8 Local green spaces and community facilities	24	96	1	4



3.0 Making Places - The Stroud Valleys	12	92	1	8
3.0 Making Places - The Stonehouse cluster	6	86	1	14
3.0 Making Places - Cam & Dursley	7	78	2	22
3.0 Making Places - Gloucester's rural fringe	10	91	1	9
3.0 Making Places - The Berkeley cluster	7	88	1	13
3.0 Making Places - The Severn Vale	7	88	1	13
3.0 Making Places - The Wotton cluster	6	86	1	14
3.0 Making Places - The Cotswold cluster	6	86	1	14
7.0 Delivery and monitoring	11	79	3	21
Appendix A - Potential changes to settlement development limits	16	76	5	24
Appendix B - Areas of search for renewable energy locations	17	85	3	15
Appendix C - Parking standards for vehicles and cycles	14	88	2	13

*percentage of response to question

Table 15: Level of support for other sections of the Draft Plan

- 3.44 Full analysis of all comments received relating to each of the chapter sections, including suggested wording changes and the Council's response, can be found in **Section 4** of this report.



4. What you told us....

- 4.1 This section of the report provides qualitative analysis of the comments received in response to each of the consultation questions and provides a Council response detailing how comments received have been taken into account in the Pre-submission Draft Plan (Regulation 19 Consultation) May 2021. The section headings reflect the sections in the Draft Plan document.
- 4.2 Quantitative analysis of the number of responses received and the level of support for the proposed policies, draft site allocations and other sections of the Draft Plan document is detailed in Section 3 above.

Section 1.0 Our District's issues, challenges and needs

Priority Issues

Support for prioritising the District becoming Carbon Neutral by 2030, improving the condition of nature, including Green Infrastructure and providing good quality homes for all. The priority issue “ensuring new housing development is located in the right place” should refer to housing and employment development. The natural environment priority should be reworded, removing the word ‘reduce’, to be more ambitious for nature’s recovery and better reflect the content of the bullet points.

Objections raised concern that transport should be considered as a separate key issue with achieving better walking and cycling provision further identified as a priority issue. Conserving and enhancing the natural beauty of the Cotswolds AONB should be identified as one of the ‘priority issues’ or ‘40 key issues’.

Key Issues

Economy

- Should refer to working with neighbouring authorities to meet the needs of Gloucestershire as a whole
- There should be an additional focus to ‘Promote a natural capital approach to help businesses build resilience to the impacts of climate change’

Affordable housing

- Support opportunities promoting a diversified housing market including self-build/custom housing, smaller sized developments and new models for housing delivery
- Include the need to provide new homes for young families, including affordable homes, in rural communities



Environment

- To be truly progressive, the local plan could allocate land for habitat restoration in a similar way to the allocation of land for development
- There should be reference to 'conserving and enhancing ecological networks'
- Should include the protection of the water environment
- There should be a specific mention of wider environmental benefits of well-designed SuDS

Health and well being

- Building houses in rural communities without considering local services has net effect of worsening local services for existing residents
- The draft plan makes very little reference to education needs arising over the plan period

Council's response

The Council considers the draft District's priority issues will help to deliver sustainable development and are in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Amend priority issue wording to ensure that all development is located in the right place
- Strengthen priority issue wording regarding developing strategies to avoid and mitigate the indirect impacts of development on the natural environment



Section 2.1 A vision for the future

Support comments

Support the Vision of the District becoming carbon neutral by 2030 and referencing the Cotswold Canals.

Objection comments

Concerned that the Vision fails to draw upon Stroud District's strategic position on the M5 corridor and its potential role in shaping the District over the plan period.

Suggested changes

- Amend wording to refer to continuing to proactively respond to climate change including projections for increased global temperature with spikes in local weather
- Include reference to the transition to the circular economy, facilitating high quality reuse and recycling of materials; and reducing the amount of waste being generated
- Include reference to the strategic location between Gloucester/Cheltenham, Bristol and Swindon
- Include reference to the motorway network shaping employment development and to the diverse range of employment opportunities for the local and highly skilled workforce
- Include reference to a vibrant and supportive agricultural community, including community food projects & allotment growers, supporting growing the Districts own food
- Recognise the delivery of new strategic-scale communities including new garden-village communities at Sharpness and Wisloe
- Should emphasise the need for economic growth, job creation and new homes to improve the vibrancy of the area and meet identified needs
- There should be an acknowledgement of the Gloucester & Sharpness canal

Council's response

The Council considers the draft vision will help to deliver sustainable development and is in conformity with national policy and in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, no changes are proposed.



Section 2.2 Strategic objectives

Support comments

Support for strategic objectives relating to reducing carbon impacts (SO5), including active travel pedestrian and cycle access (SO4), and conserving and enhancing biodiversity (SO6). Welcome explicit support for existing businesses alongside new enterprise (SO2).

Objection comments

Concerned that Objective SO1 is too imprecise as a basis for a sound planning strategy.

Suggested changes

SO1 – Accessible communities

- Consider differentiating between Affordable Housing and Social Housing
- Include explicit statement that the identified future housing requirement will be delivered in full to ensure that there is a choice and mix of housing to meet future needs

SO2 – Local economy and jobs

- Replace 'growth' with 'balanced intelligent economy' to be compatible with Carbon Neutral targets
- include reference to working with neighbouring authorities to meet the needs of the local and regional economy and potential as an additional strategic Objective SO2a for Employment development

SO4 – Transport and travel

- Include reference to working with neighbouring authorities to deliver strategic cross-boundary transport objectives

SO5 – Climate change and environmental limits

- Include to reference to supporting an increase in the volume and quality of waste recycling and transition to the circular economy
- It should include the role of green infrastructure and green space in the strategic objectives.
- The objective should identify the landscape capacity of the Cotswolds AONB as an additional key environmental limit

SO6 – Our District's distinctive qualities

- Biodiversity should be referred to as a foundational need, reflecting the extent of the ecological crisis, rather than a quality
- Include specific reference to the Cotswolds AONB



Council's response

The Council considers the draft strategic objectives will help to deliver sustainable development and are in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Add new bullet point to Strategic Objective 6 referring to the green infrastructure network

Section 2.3 An introduction to the Development Strategy

Support comments

Strategy options

- It makes good sense to seek to generally locate new development in close proximity to existing sustainable settlements
- The approach of concentrating housing growth at larger towns with lesser levels of growth in smaller settlements is supported
- It makes good sense to seek to generally locate new development in close proximity to existing sustainable settlements
- The approach of concentrating housing growth at larger towns with lesser levels of growth in smaller settlements is supported
- The delivery of 'new garden village communities' provides an opportunity to transform all services for both new and existing residents and businesses
- Broadly supports the proposed 'hybrid' strategy, though too much development is directed at 'Vale' settlements and not enough in the AONB areas
- Support smaller scale development to meet local needs within AONB
- in accordance with the NPPF, a robust approach has been taken to apportioning housing growth based on existing and future employment, services and housing needs.
- Support the strategy to provide new employment to meet the needs for the next 20 years and to concentrate employment growth within the A38/M5 corridor
- The transport strategy is supported subject to a review of the modelling and associated mitigation package(s) requirements
- The spatial strategy of providing major employment opportunities and housing along the A38/M5 corridor must not undermine the primary role of the strategic road network which is to facilitate the long-distance movement of goods and people

Strategic sites

- The Plan should adopt a realistic approach in terms of the lead in times and delivery rates for these types of developments
- It is important that the Council considers in detail the infrastructure requirements, overall viability and delivery timeframes for the proposed new settlements
- It is essential that additional services are provided in tandem with new housing development
- The connectivity of the sites to existing settlements, public facilities, key employment sites, educational facilities is very important

Other matters



- There should be a much stronger emphasis on improvements to rail services to support housing and employment growth - need to agree a clear vision and plan for stations and build into strategy
- Support for new stations at Stonehouse Bristol Road, and Charfield and better facilities at Cam and Dursley station
- It should be an objective of new development to the south of the Stroud area to not exacerbate existing congestion and to ensure impact on the M5 Junction 14 is minimised

Objection comments

Duty to cooperate

- Object to Stroud District having to accommodate housing for other districts in the county, e.g. Gloucester City, Cheltenham and Tewkesbury. Other districts should deal with their own needs

Strategy options

- The Council has ignored the wishes of the public and have chosen their own preferred options and sites
- There are a number of better sites which have been ignored with no assessment made
- In consulting on the issues and options paper of October 2017 the public's least favoured option was 4. Focus On a Single Growth Point, yet the plan includes Sharpness and Wisloe which together form that single growth point - the least favoured option
- There is an overreliance on the two new settlements to deliver a significant proportion of the required growth and due to their proximity there is likely to be a slow rate of delivery due to market saturation in the local area
- The strategy is to concentrate housing growth at the main towns but very little is proposed at Stroud given the town's size and importance and brownfield sites are difficult to deliver. There are other greenfield sites which could be delivered.
- Object to the siting of 80% of the additional houses in the southern half of the District
- There is low employment in the south of the District and so would render allocations here dormitory settlements. There is more employment within the north of the District where development should be located
- Strategy fails to capitalise on the good infrastructure, transport and employment that exists in the corridor north of M5 J.13
- Rebalancing can be achieved through dispersal, reassessment of Tier 4 and 5 sites and reassessment or removal of strategic sites in the south of the district to reduce impact
- Opposed to a 'hybrid option' to local housing needs specifically as the creation of a large new 'growth point' is inappropriate anywhere in the district
- Strategy fails to properly support the long-term sustainability of lower tier settlements.
- The strategy is premised on "lesser levels" of growth being directed to Tier 3a villages, even though many of these locations have a range of local facilities and / or benefit from good transport links to strategic facilities at nearby towns
- Smaller sites tend to be less encumbered by physical constraints and require less new or improved infrastructure to be provided in order for them to deliver housing swiftly



- Allowing some development sites adjoining settlement limits at Tier 1 to 3 settlements will need careful policy management to avoid exploitation by developers. In the absence of a Neighbourhood Plan, who will decide what the “specific identified local needs” are?
- The Severn Vale is an area of good, productive farm land, is liable to flooding and is an attractive landscape. The beauty of the Vale is one of the reasons so many people wish to live here – we must protect this beauty
- Object to housing allocations within the Cotswolds AONB, demonstrating an inadequate protection of the AONB and because of the inadequacy of the local road system to cope
- Existing infrastructure deficiencies in villages may require more development than proposed in the Plan to overcome them
- It would be far better to build on brown-field sites, especially those nearer to bigger urban areas, where there is employment and infrastructure in place

Strategic sites

- Concerned about the impact on our local secondary school and medical facilities (e.g. GP surgeries) and their capacity to cope with the proposed large sites in the south of the District
- Concerned about the increased traffic on the A38/A4135 and the additional pressure on the road network and parking facilities, including M5 junctions, aggravating existing issues
- Concerned that the scale of development will swamp the current infrastructure. Improvements are implemented very slowly, usually around half way through a project, rather than at the outset, which exacerbates impacts on the local community.
- Concerned that major development is proposed in areas with inadequate and linked rural drainage systems, e.g. Whitminster and Frampton on Severn.
- The motorway junctions are over capacity during commuting times. Traffic will increase, particularly with siting some of the developments too far from centres of employment
- It is unlikely that all of the proposed allocations in the south of the District will come forward as envisaged. Thus an alternative location for major development and/or addition dispersal will need to be brought forward within the emerging process of the Local Plan
- The Draft Plan does not propose any strategic scale employment sites which would help to meet national and regional needs

Suggested changes

- Hardwicke should be identified within the strategy’s draft headlines

Council’s response

The Council considers the section will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Update the process and evidence justifying a ‘hybrid’ approach to the development strategy based upon concentrated development at the main towns but including one or two growth points and additional dispersal to the smaller towns and larger villages
- Include references supporting regeneration of the canal corridor through the Stroud Valleys and at Sharpness, building upon the adopted Local Plan development strategy and clarify the strategy for Hardwicke



- Make additional references to regenerating previously used sites to support maximising the use of brownfield land
- Identify the strategic employment land quantum required and provide for additional strategic level growth at Javelin Park
- Strengthen support within the strategy for sustainable transport infrastructure improvements, including new interchanges at growth locations, new rail stations at Stonehouse and Sharpness and improvements to existing stations
- Provide support for enhancing the beauty of the AONB landscape, but reflect the need to support the social well-being of communities through housing where justified to meet local needs

Section 2.4 Our towns and villages

Support comments

- Support the overarching strategy of meeting needs by concentrating housing growth at the main towns of Cam and Dursley, Stonehouse and Stroud where there is best access to services, facilities, jobs and infrastructure
- Support the intention to consolidate growth to the north east of the Cam, linking the parish centre with improved facilities at Cam and Dursley railway station and completing the linear park and local cycling and walking network
- Strategy is successfully conveyed by threading detailed intention through sections 2.3 Development Strategy, 2.4 Our towns and villages, and 2.7 Our town centres.

Objection comments

- The basis for the Settlement Hierarchy is outdated: namely, the Gloucestershire Structure Plan (1991); hence it is founded on an outdated strategy which gives too much weight to retail provision
- The proposed new settlements (at Wisloe and Sharpness) are out of kilter with the scale and character of the District's existing Tier 2 and 3a settlements
- Wisloe and Sharpness will not function as Tier 2 or 3a settlements during initial development phases
- Object to disproportionate reliance on creation of new settlements as a means of meeting the District's needs, rather than growing existing sustainable settlements; this approach subverts the objectives of the development strategy and potentially curtails the ability of lower tier settlements to grow and thrive
- Paragraphs 2.18 and 2.36 allow for some development sites adjoining SDLs at Tiers 1 – 3. Policies in the plan must make clear who will decide what the "specific identified local needs" are, in the absence of an NDP; in deciding planning applications does this policy, or the local environmental constraints, take precedence?

Suggested changes

- The plan should refer to Cam as a village (not a town) and as distinct from Dursley

Council's response

The Council considers the section will help to deliver sustainable development and is in conformity with national policy. The evidence base for the settlement hierarchy is considered to be sufficiently broad to assess the roles and functionality of the District's settlements, relative to each other, and is not overly reliant on retail provision as a driver for the hierarchy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Clarify the role of local centres at new garden village settlements
- Bring together the description of "Garden City Principles" (in chapter 3 of the Draft Plan) with an explanation of how the new settlements at Hunts Grove, Sharpness and



Wisloe will sit within the Local Plan settlement hierarchy once complete, to clarify the envisaged character, role and function of the planned new settlements

- Provide clarification through the supporting text for policies CP3, CP8, CP9, DHC2, HC3, HC4, DHC3, HC1, DHC4, DHC7, EI10, EI11, CP15 and DES1 about the circumstances in which “exceptional” development may be permitted adjacent to (outside of) SDLs



Section 2.5 Housing

Support comments

Housing requirement

- Support the Council using the standard method as the basis for the calculation of housing need as this aligns with the latest national planning policy and guidance
- SDC is demonstrating a positive approach to delivering housing needs within the Severn Vale area and across the wider Gloucestershire housing market
- Support is provided to the level of growth although the figure should be viewed as an absolute minimum especially as the local housing need figure for Stroud will rise from 638 to 656 in the event that the current Local Plan becomes time expired in November 2020
- The Council should be open minded to the fact that this figure may increase further through Duty to Cooperate discussions and consideration of economic growth aspirations
- Support is given to Stroud's recognition of their Duty to Co-operate in assisting Gloucester City Council in meeting their un-met housing needs. This is likely to require a higher figure of housing provision than the standard method as it has already been identified that additional sites will be required to meet Gloucester's housing needs beyond 2028
- SDC is identifying approximately 15,300 dwellings in its emerging Local Plan, which provides flexibility and contingency of approximately 17% to deal with unforeseen changes in the numbers generated by changes to the standard method up to submission of the Local Plan
- The figures should be kept under review to ensure that this flexibility is maintained to deal with the changes that are likely over the next few months with the release of new 2018-based sub-national population and household projections and expected government-led changes to the Standard Method
- The standard method for calculating housing need is a minimum and that this should not be seen as a definitive target or cap on sustainable development being brought forward
- The Plan should provide sufficient contingency and flexibility for occasions when allocations do not come forwards as planned. The Plan should include a 10-20% flexibility factor

Particular needs

- More support for self build or custom build sites, these can deliver high quality homes often with high environmental credentials and help create communities
- Support provision to meet the needs of older people and urge the Council to ensure that the Local Plan includes a positive policy approach to ensure delivery

Objection comments

Housing requirement

- The standard method identifies a minimum annual housing need figure, it does not produce a housing requirement. Neither should this figure be referred to as a target



- The emerging Local Plan table 2 identifies a housing requirement for 13,216 homes which does not even meet the capped minimum housing need for 13,406, let alone meet the actual minimum housing need for 13,683 dwellings. Therefore, the Plan should increase the housing requirement to at least 13,406 dwellings and consider whether this should be increased to 13,683 dwellings or addressed through an early review
- Where the proposed housing requirement would deliver less than half of the affordable need, there is a strong case for increasing the housing requirement to deliver a greater number of affordable homes
- The Plan should be clear and include the unmet housing need for Gloucester in the overall requirement
- It is assumed that the Council has applied the definition of deliverable set out in Annex 2 of NPPF and adopted a 'realistic assessment' of delivery trajectories as required by NPPF paragraph 72
- The housing supply in the plan table 2 is about 2000 more than required. Why impose a requirement that is more than necessary?
- There is no track record of developers being able to build 638 homes per annum in Stroud and no indication that they will do so in the future

Particular needs

- Delivery of self-build sites primarily through a small allocation on large development sites, will not satisfy the demand for the right size, quality and pleasantly-located plots for those who are willing to take on the risks and hard work involved with self-build
- If more care home places are needed, why are care home sites not being identified strategically (and existing homes being closed)?
- This set of aims does nothing to indicate how "additional affordable homes working with parish councils, co-operatives, community land trusts and community housing groups" will be achieved given that such enterprises are often inexperienced and under-resourced. What support will be made available to these groups to purchase and develop land?
- It does not appear that the Local Plan Review has accounted for the NPPF update to the affordable housing definition. The Local Plan Review must recognise the updated affordable housing definition in order to ensure that all needs are properly considered
- In the current financial climate, there are many people forced into private rented accommodation at high rents comparative to their earnings because they neither qualify for social housing nor can afford market housing at today's prices. This is not necessarily about providing more intermediate housing, but rather about ensuring sufficient social housing within the allocation of affordable housing
- Nationally the number of boaters who now claim that their boat is their main home has increased. We suggest that the need to include this specific type of housing be considered when considering housing need



- The draft plan makes very little reference to education needs arising over the plan period. The provision of good school places alongside housing growth is not among the priorities and objectives of the plan, and DfE recommends that this is addressed in the next version

Suggested changes

- The Plan should increase the housing requirement to at least 13,406 dwellings
- Include the unmet housing need for Gloucester in the overall requirement
- Recognise the updated affordable housing definition
- Consider the needs of boaters
- More support for self-build or custom build provision
- More support to help local groups deliver affordable housing
- Make reference to education needs arising over the plan period

Council's response

The Council considers the section will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Clarify wording relating to the housing standard method and update housing need and housing supply figures
- Make reference to addressing unmet housing needs from neighbouring Gloucester City
- Refer to adaptable and accessible homes rather than lifetime homes
- Refer to Council support for affordable housing providers
- Refer to the provision of supporting infrastructure for those living within the District
- Update glossary to reflect changes to the definition of affordable housing

Section 2.6 Local economy and jobs

Support comments

- There needs to be more of an alignment between housing allocations and the provision of employment for the local population to reduce commuting
- It is believed Cam is not a primary employment location, and has a large proportion of commuters. Although support to local economy and jobs is welcomed, it is difficult to see how this is delivered in Cam where commuting is an easy option
- More needs to be done to retain existing businesses, and provide space for expanding businesses
- Needs clarification on how existing businesses outside of settlement development limits and not classed as employment sites, are able to expand operations within the framework of the proposed development policies
- Needs encouragement for small scale agro-ecological business to support employment, food production, carbon reduction, soil protection and biodiversity restoration
- Not enough employment land is put forward in the plan to strengthen local employment
- Employment provision needs to be balanced with housing provision to reduce commuting
- There is concern with previous allocated sites not coming forward
- Other factors that influence the economy need consideration, such as better broadband, parking, and transport links
- More co-working space is needed around the district

Objection comments

- There were no specific objections raised

Suggested changes

- There were no specific changes suggested

Council's response

The Council considers the section will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Reference to the draft Local Industrial Strategy (LIS) focus on attracting and retaining talent and the particular strengths of Stroud District
- A need to plan for an increased number of net new jobs of between 7,740 and 10,440 jobs (2020 – 2040)
- A need to provide an increased supply of employment land (offices, industrial and storage and distribution) of between 62 and 72 hectares (2020 – 2040)
- Recognise the need to review employment land requirements once the full impact of Covid-19 and Brexit has become apparent



- Reference to the six key sectors of market demand for employment land in Stroud District
- Include reference to Stonehouse, Cam/ Dursley and Berkeley/ Sharpness as key employment property market areas
- Include reference to specific employment opportunities at Javelin Park and Stonehouse



Section 2.7 Our town centres

Support comments

- Overall support for the findings of the “Future of Town Centres” report
- General support for strategies to support the evolution of the High Street
- Towns, other than Stroud, would benefit from investment to increase their market share
- Parking charges need to be tailored to each individual town and not applied at a blanket rate across the District
- The enhancement of Nailsworth and Minchinhampton centres must be coordinated so that both can flourish

Objection comments

- Object to public funds being used to improve Merrywalks, meaning other towns and independent traders lose out

Suggested changes

- There were no specific changes suggested.

Council’s response

The Council considers the section will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Recognise the changing role of town centres and impact of the COVID-19 pandemic
- Provide increased flexibility in the range of town centre uses outside primary shopping areas
- Refer to support for local independent retailer investment
- Clarify the role of local centres at new garden village settlements



Section 2.8 Local green spaces and community facilities

Support comments

Principle

- Support delivery of improvements to local open space, sport, recreation and community facility provision as part of housing growth
- Support working with neighbouring authorities to develop recreation strategies, including for the Severn Estuary, and deliver cross boundary green space, open space and community facilities
- Encourage the use of best practice guidelines in order to shape spaces that encourage physical activity and access to green space in particular for older adults and people with disabilities
- Support additional green space provision, including trees and woodland, with positive benefits for communities, health and wellbeing, biodiversity and place making
- Would support allocation of land for habitat restoration, guided by the Nature Recovery Network map to maximise biodiversity benefits
- Local Plan should meet local greenspace requirements set out in the NPPF and PPG
- Local Plan provision should support identified NDP green space and green infrastructure features

Green Infrastructure

- The production of a Green Infrastructure network has not met the requirements of the NPPF or the likely requirements of the Environment Act in terms of ecological networks
- Need to clarify the distinction and relationship between the Green Infrastructure network and wider ecological networks
- Support for Greenway projects and improved, traffic free active travel routes to work and school to improve access, promote healthy lifestyles and help reduce carbon emissions
- Support the aim to ensure net gains for the natural environment by extending, enhancing and delivering green infrastructure
- Support the protection and enhancement of green connections for people and wildlife

Specific projects

- The restoration of the derelict canal is crucial to the delivery of the adopted and emerging Stroud District Local Plan. The bid to secure the funding for Phase 1B of the canal restoration should be integral to the plan
- Support improvements to facilities at the Jubilee Field, Cam but need to address and improve non-pedestrian access to the site
- Support future development at Wotton Community Park



- Highlight potential of unused former rugby pitch at Marling School to address needs identified for 3G and additional rugby pitch provision in Stroud
- Need to make provision for the relocation of the skate park in Stroud
- Question the potential of Stratford Park Leisure Centre to meet the requirements of Stroud Hockey Club identified in the Open Space, Green Infrastructure, Sport and Recreation Study, including a separate clubhouse facility, if the skate park goes ahead?
- Should seek to proactively bring forward facilities for Stroud & District Athletics Club

Objection comments

- Concerns about the capacity of community facilities including secondary schools, and health facilities and the ability to cope with increased demand from strategic development
- Need to concentrate on integrating existing and new development and creating self-supporting communities minimising the need to travel
- Prioritise open spaces and places for children to play in their local area in new development
- Development should recognise the identified NDP Green Infrastructure network at Cam

Suggested changes

- Expand definition of GI and mapped GI network to include blue and green infrastructure.
- Include commitment to a mapped ecological network and an explanation of its relationship to the GI network
- Should include improvements to the Gloucester/ Sharpness Canal towpath to deliver its potential as a tourist and commuting cycle route
- Refer to restoration of the derelict canal between Stonehouse and Saul Junction, reconnecting Stroudwater Navigation to the Gloucester & Sharpness Canal, including creating 30 hectares of biodiverse habitat and *completing* the canal towpath
- Refer to continued protection *and enhancement* of identified areas of biodiversity, landscape and heritage importance

Council's response

The Council considers this section, together with changes to policies ES6 and DES2, will help to deliver sustainable development and is in conformity with national policy and in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, no changes are proposed.



Section 2.9 Core Policies

Core Policy DCP1 Delivering Carbon Neutral by 2030

Support comments

Principle

- Strongly support this policy
- Must be the core policy to guide future development
- The ambition and clarity is excellent
- This is a challenging but proportionate response to the Climate Emergency
- Support as changing climates present significant risks to both water availability and frequency of rainfall events amongst other impacts
- Strongly support although it will be particularly challenging to achieve in rural areas
- Equal consideration – and equal policy status - should also be given to the issue of climate change adaptation
- Important that the requirement for design to reduce vulnerability to and provide resilience from the impacts of climate change is retained
- Support, subject to viability considerations and a balanced approach to social wellbeing, the local environment and economic stability

Energy

- All new dwellings should be designed to be carbon neutral to receive planning consent or at least all new dwellings must rely solely on decarbonisable energy
- A defined standard for energy efficiency should be mandatory not reliant on viability
- No amount of efficiency will lead to carbon neutrality, invest in reducing carbon through investing in new renewable energy instead
- Support for retrospective installations to achieve optimal thermal efficiency
- Consider larger-scale renewable power generation (wind, solar, biogas etc.) as well as options for new development using district heating
- Local plans should integrate with energy plans such as renewable heating and provision for electric charging points for vehicles

Transport

- Support for new railway stations (Stonehouse and Charfield) to achieve modal shift
- Support for additional Greenway routes and better and more visible bus services
- Needs to be strong support for rural cycle routes and public transport links (bus routes and rail links) to underpin the policy
- We should support new electric vehicles not discourage the use of the private car. Carbon neutrality is about changing the source of the energy which powers our cars



- Need to recognise the challenges of reducing car use in rural areas where alternatives (such as public transport) may not always be available.

Natural Environment

- The maintenance and enhancement of open spaces with further protection and planting of trees and hedgerows are key to delivering these objectives.
- Sequestration and emission reduction needs to be encouraged and enabled across the agricultural and horticultural sectors. Opportunities should also be taken to promote community-based food growing initiatives.
- Highlight the role of trees and woods in building resilience, for example providing shade and urban cooling, alleviating flooding, improving air quality, supporting biodiversity and providing wellbeing benefits.
- Actively plant trees in proportion to the additional CO₂(e) Stroud area adds until true carbon neutrality is achieved. Either encourage private landowners to plant and become part of a scheme or tax or compulsory purchase.
- Enable residents to grow their own food or shop local (further allotments).
- Reduce emissions through land use (including tree planting initiatives).
- Achieving carbon neutral status should not be delivered at the expense of other key objectives, such as conserving and enhancing the natural beauty of our most outstanding landscapes, such as the Cotswolds AONB.

Built environment

- Reducing the amount of housing that has to be built will be the only way to achieve carbon neutrality by 2030.
- Houses that are exceptionally carbon negative should be given a presumption in favour of development, whether inside or outside settlement development limits. For example, requiring “exception sites” to be exceptionally carbon negative would put such sites out of the reach of profit driven mainstream developers and into the reach of smaller scale self and custom build homeowners, who will have a vested interest in long term home ownership costs.
- The carbon neutrality target can’t be achieved without addressing the carbon footprint of what we have already. For example, there is a need to retrofit existing housing and businesses to reduce their current carbon footprint (e.g. make properties more energy efficient; switch from gas boilers to solar and ground source heat pumps; encourage water collection tanks so less drinking water needs to be used for toilets etc. This should be encouraged and incentivised, either by grants, reductions in Council Tax / Business Rates, or penalised by increased local taxes.

Waste

- We need to adhere to the waste hierarchy and support efforts to 'reduce' waste as a priority.



- We should support Community Composting sites and support communities to develop voluntary schemes to deal with green waste almost at source. New development could be designed to facilitate these
- Reduce emissions from food waste (ensuring we continue the food waste collection scheme).
- We should be encouraging businesses to recycle more in house
- Provision of household waste services must try to reduce the need to travel by car

Green economy

- Reduce unnecessary single use plastic within the district

Community

- Parish councils should be encouraged to make the commitment
- Welcome the opportunity to collaborate across administrative boundaries on the issue, where possible and practical
- This policy has great potential to deliver positive impact across a number of health and wellbeing factors and to reduce inequalities
- There is the potential for issues of affordability if higher environmental standards are implemented which could impact the most vulnerable in society. Measures must be taken to ensure that the poorest in our district are not disadvantaged in delivering CN2030

Delivery

- Important that the development strategy, allocated sites and actual permitted development are in accordance with this policy
- The timely delivery of supporting infrastructure is required to encourage behaviour change and modal shift
- What mechanisms are available for sites with permission, under construction or on sites subject to resolutions to grant permission to move closer to being carbon neutral?
- More thought needs to be given to defining the baseline and setting out specific measurement and monitoring activities

Objection comments

- Far too ambitious. The District should stick to the government's more realistic date of 2050.
- The issue needs to be addressed at a National and international level only. Local policy should be no more onerous than current Building Regulations
- Electricity grid and generation totally inadequate to support mass electrification of transport.
- Achieving rural sustainable travel modes is unrealistic and therefore the policy is contrary to NPPF para. 103. There should be a more phased approach to becoming zero carbon
- 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

- It is not clear as to how all new developments are expected to support “local food production”. There are no prescribed standards in national guidance or indeed, in the Local Plan, as to what is expected

Suggested wording changes

- Achieving CN2030 should be stated as a target rather than a certainty
- Replace 2030 with 2050 which accords with Government policy and the carefully assessed guidance from the IPCC
- It is unclear if the list of requirements are all to be achieved. It would be more clear if the list of requirements ended with '; and' rather than just ';'.
- Add “equestrian” to active travel measures
- Amend point 3 to refer to the wider benefits of GI, including nature recovery and local food production
- Set a target of new development achieving 30% tree canopy cover
- Refer to the following waste-management related measures: - transitioning to the circular economy; reducing the amount of waste being generated; and supporting an increase in the volume and quality of waste recycling’
- 'New development' should be clarified to include renewable and transport infrastructure, not just buildings
- Include a climate change adaptation policy that sits alongside Core Policy DCP1. This policy could include references to measures to reduce the risk of flooding and establish coherent and resilient ecological networks
- Identify more detailed policies that encourage and enable more thoroughgoing adaptation and sequestering of carbon to take place. See TCPA/RTPI report ‘Rising to the Climate Crisis: A Guide for Local Authorities on Planning for Climate Change’ (sections 3.1 and 4.4)

Council’s response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Include reference to the benefits of green infrastructure in terms of nature recovery
- Add a criterion referring to reducing waste and promoting a circular economy
- Provide references to measures to adapt and provide resilience to climate change
- Update glossary and include explanation of approach in supporting text



Core Policy CP2 Strategic growth and development locations

Support comments

Duty to cooperate

- Support is given to Stroud's recognition of their Duty to Co-operate in assisting Gloucester City Council in meeting their un-met housing needs

Housing requirement

- Support the level of growth of at least 12,800 new dwellings up to 2040

Strategy

- Strongly endorse concentrating housing development at locations where there is currently the best access to services, facilities, jobs and infrastructure; creating new sustainable communities at locations where development can transform existing access to services and infrastructure and concentrating employment growth within the A38/M5 corridor and at locations in tandem with housing growth
- This strategy is considered to be sustainable, soundly based and appropriate, and will address a weakness in the existing Plan, which is premised on concentrating growth at a few locations, whilst unduly limiting growth in mid-tier settlements
- Support the building of new settlements and expansion of large sites next to Gloucester to provide the bulk of extra housing need. Protection of our countryside and green infrastructure is paramount. Not comfortable with pressure on smaller towns and villages, especially within or next to AONB
- Support the 'hybrid model' of distribution, which seems most appropriate and sustainable where housing concentrations are centred around the M5 corridor, close to important transport links and workplaces
- Whilst the spatial strategy poses potential issues for the strategic road network, we acknowledge that factors such as environmental constraints in the District, mean that allocations along the M5/A38 corridor are to be expected
- Support reinforcing the existing major growth locations South of Gloucester; at Stonehouse; and at Cam, which have the potential to deliver SMART growth by locating homes, access to sustainable transport and jobs and services in close proximity
- Support the move away from a trend based to a more proactive '*policy-on*' approach to the local economy and the proposed distribution of new sites which will provide an attractive range of accessible new employment opportunities within the District

Other matters

- It is vital to ensure that the growth locations are well joined-up with amenities (shops, schools, surgeries, hospitals etc.) and are designed to reduce reliance on the private car



- Support proposals to improve access to stations and rail services
- All new development should be built in conjunction with renewable power systems so that the total build is carbon-negative - to help offset existing emissions
- Any new or extended community should adhere to the waste hierarchy and be supported in its efforts to 'reduce' waste as a priority
- Locations must be reviewed according to long term (year 2100) flooding risk assessment
- Need to consider the potential impact of the proposed allocations on the sewer network

Objection comments

Duty to cooperate

- Sites on the southern edge of Gloucester should not meet Gloucester's needs. Whilst cooperation with the JCS over their housing/employment needs is necessary, it should be recognised that the needs of Stroud can/will also be met on the sites south of Gloucester
- The potential allocation of land to meet Gloucester's needs does not provide the level of certainty needed and may lead to need having to be met by other neighbouring authorities, which in turn, has implications for their ability to meet their own housing needs
- The scale of development could pose significant challenges for the operation of the transport network in South Gloucestershire

Housing requirements

- The Government methodology for calculating housing requirement is flawed and does not work for Stroud where house prices are driven by people migrating in (often to retire) and are not driven by affordability in relation to local wages
- Support the District becoming Carbon Neutral by 2030 but it is not clear that this is entirely compatible with the scale of strategic growth and locations outlined
- The Draft Plan identifies a Government target for a need of 12670 homes over 20 years. Why does the Local Plan show a plan in excess of 15000?
- The proposed allocation numbers excluding windfall is currently 8725. This is already nearly a 10% margin over the minimum which appears excessive in light of falling estimates of need
- The LHN assessment is only a minimum starting point and any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere may necessitate a housing requirement figure above LHN
- Due to the high affordable housing need in the District, the housing requirement should be increased to ensure the Plan meets in full the housing needs of the District
- The total allocation figure on identified sites of 8,725 is too low as it relies upon the overly-positive assumptions on 'commitments', windfall sites and brownfield sites, which are unlikely to deliver affordable housing and should therefore sit outside of the supply
- National policy permits an allowance for windfall sites only if there is compelling evidence that such sites will continue to be a reliable source of supply



Strategy

- There is a lack of allocated sites at Stroud and Dursley, the two largest settlements
- The overall plan puts a disproportionate burden on the southern part of the District and needs to be reconsidered. The majority of employment is in the north of the district and as such has the infrastructure to deal more effectively with increased number of developments
- Rebalancing can be achieved through dispersal, reassessment of Tier 4 and 5 sites and reassessment or removal of strategic sites in the south to reduce numbers and impact
- The entire plan needs to be reviewed to lessen the impact on strategic locations and spread the housing over more areas with smaller developments
- Dispersal should form the core of an updated Local Plan alongside a degree of concentration
- Dispersal is recognised as a way of supporting local builders, maintaining community sustainability, preserving a rural sense of place, diversifying housing type and providing a mechanism to speed up housing delivery
- Growth should be spread to include more at Tier 2 settlements and more of the Tier 3 settlements which are capable of taking a much greater proportion of housing and would support the long-term sustainability of lower tier settlements
- Those Tier 3 settlements directly on the Sustainable Movement Corridors are likely to represent much more appropriate locations for growth than those locations that are not.
- Advocate a broader range and more flexible range of sites to ensure that the supply of housing can continue to be delivered in the shorter term to maintain a 5YHLS
- The NPPF places new emphasis on small medium sized housing sites to come forward in order to boost housing supply and offer quick deliverability (circa 20 – 100 dwellings)
- Widespread dispersal on very small sites of less than 1 hectare is a requirement of the NPPF
- Development at larger rural settlements (Berkeley, Minchinhampton) and in vicinity of Cam should be reduced to avoid suburbanising the countryside setting
- Object to the proposed allocations in the Cotswolds AONB on the grounds the Council has not had due regard to the purpose of conserving and enhancing the natural beauty of the Cotswolds AONB and has not reflected requirements of NPPF regarding major development and accommodating unmet needs from adjoining areas
- The Local Plan Review should avoid an overly prescriptive inflexible approach to development proposals on the edge of towns and villages given the likely necessity to meet a higher housing requirement in the future
- There is a risk that in broadening the scope of what can be built outside settlement development limits inappropriate development becomes more difficult to resist
- Much more effort should be put into encouraging development of existing brownfield sites or redeveloping/ converting existing disused buildings
- There is insufficient evidence presented supporting the ability of the local housing market to absorb the magnitude of development which is being proposed
- The strategy focusses on employment on new employment sites or within settlement boundaries and does not appear to support business development on existing premises



- The strategy does not provide for strategic scale employment sites. Larger sites should be allocated suitable for national or regional warehouses of 266,000+ square feet
- Enormous pressure would be put on the existing Motorway junctions 13 & 14 and the A38, A4135 and B4066, which already reach capacity at peak times

Suggested wording changes

- The policy or supporting text should indicate how the housing target is to be spatially apportioned, either by settlement hierarchy tier or by 'Parish Cluster' area

Council's response

The District Council has a duty to cooperate with adjoining authorities to ensure unmet needs can be accommodated. Recent site assessment work has identified sites on the southern edge of Gloucester as having potential, along with other sites to the north of Gloucester within Tewkesbury Borough. The Council has therefore safeguarded the most appropriate site within Stroud District to help meet unmet needs should the site be needed and provided it is in accordance with the Joint Core Strategy Review strategy.

The impact of the Draft Local Plan on the local road network has been assessed. A combination of sustainable transport measures and highway mitigation can be delivered to address potential impacts. The Council will continue to work with South Gloucestershire Council to ensure cross-boundary impacts can be addressed.

The Draft Local Plan will meet minimum national requirements for additional housing and provide sufficient headroom to take account of deliverability issues. Neither housing nor economic growth studies have identified a need for an uplift above the minimum requirement. A breakdown of the final supply by parish area will be identified in the final Plan. Affordability issues are already taken into account in the Government methodology. Existing commitments have been discounted to take account of sites that will not come forward. A modest small sites windfall allowance is based upon robust evidence relating to historic windfall development achieved.

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.

The Draft Local Plan, together with the Council's Brownfield Register, identify many opportunities for small scale development, particularly on brownfield land, to ensure a good mix of sites to meet the housing requirement, in accordance with the NPPF. The Draft Local



Plan development strategy provides further opportunities for small scale development on the edge of smaller settlements to meet local needs.

The Draft Local Plan employment strategy envisages a range of new employment provision, including protecting existing key employment sites, allocating new sites including strategic sites for new provision, supporting town centres and rural diversification and tourism opportunities.

The topography of the District and landscape and flood risk constraints to the east and west of the District means that, inevitably, development will have some impact upon the main movement corridors unless mitigation is planned for. The Draft Local Plan development strategy and strategic sites have been subject to transport assessment to ensure that the development can be accommodated without adverse impacts upon the transport network and a range of sustainable transport and highway mitigation measures are proposed.

Core Policy CP3 Settlement Hierarchy

Support comments

- Support for the proposed classification of specific settlements is summarised over page (Berkeley, Cam, Dursley, Hardwicke, Hunts Grove, Minchinhampton, Nailsworth, Painswick, Standish, Stonehouse, Stroud, Whitminster)
- Several comments expressed support for the policy and the principle of the settlement hierarchy, subject to the re-assessment/re-classification of specific settlement(s)

The use of the hierarchy as a means of spatially distributing / apportioning growth and development:

- Support the principle of having a settlement hierarchy, in which development is steered towards the larger, more accessible settlements that have good facilities, services and employment opportunities
- Support for Tier 1 'Main Settlements' being the primary focus for growth and development.
- Support the statement that Tier 3a settlements are considered to offer the best opportunities for growth to improve self-containment, after Tier 1 and 2 settlements
- Tier 3a settlements can accommodate a level of growth needed to support the vitality of these communities and can provide for flexibility and diversity in the housing supply through the range and type of sites they can bring forward
- Support flexible approach to the use of SDLs, which recognises that there may be sites outside of these but well related to the built form, which could bring forward sustainable development
- Allocation of the following sites is consistent with the hierarchy and policy intent: PS05 (Minchinhampton), PS30 (Hunts Grove), PS43 (Hunts Grove/Hardwicke/J12); PS24 (Cam)
- Additional or alternative sites promoted as being consistent with the hierarchy and policy intent: Minchinhampton, Berkeley, Dursley, Painswick



CP3 diagram (fig.3):

- The diagrams (fig. 3) depicting how policy CP3 will apply to the different tiers are helpful; the visual articulation of the policy is commendable
- Welcome the explicit mention of education among the mixed uses of strategic sites at main settlements and local service centres (diagram fig. 3)
- Detailed and informative explanation of which type of settlement, and where within those settlements different types of housing will be supported; specifically, custom and self-build

Relationship to other Core and Delivery policies:

Due to the cross-cutting nature of **CP3**, some comments expressed support for aspects of the policy that effectively reiterate, articulate or link to details or criteria that are set out in other plan policies, including comments about: self-build / custom-build (**HC3**), exception sites, affordable housing and local need (**CP9, DHC2, HC4, CP15**) - particularly within the AONB (**ES7**) and particularly with reference to small sites adjoining settlement development limits. The points raised are summarised elsewhere in this report.

Objection comments

- Objections about the proposed classification of specific settlements are summarised over the page (Chalford, Frampton-on-Severn, Horsley, Kingswood, Painswick, Upton St Leonards, Whitminster)

Evidence: including settlement role and function

- The hierarchy is unsound because it is based upon outdated and inaccurate evidence
- Settlement Role and Function Study has too narrow a focus on how the role and function of settlements is determined; fails to provide an accurate assessment of individual settlements
- The evidence for the tiers has been applied inappropriately
- A health check of the 'Retail Centres' (specifically Painswick) must be carried out, and necessary adjustments must be made to the 2018 Settlement Role and Function Study
- Hierarchy classification fails to recognise the functional relationship / proximity of settlements lying south of Gloucester, a major urban area; and the future impacts of strategic developments in South Gloucestershire on settlements in the south, including Kingswood

The use of the hierarchy as a means of spatially distributing / apportioning growth and development:

- Objection / concern expressed about the implications of hierarchy classification on levels of growth and/or allocations at specific settlements:
- Tier 1: Dursley (too little); Cam and Dursley (too little)



- Tier 2: Minchinhampton (too much; too little), Wotton-Under-Edge (too much), Berkeley (too little), Painswick (too much; too little)
- Tier 3a: Frampton-on-Severn (too much), Whitminster (too little), Kingswood (too much, too little), Eastington (too little)
- Tier 3b: Bisley, Oakridge Lynch, Horsley (too much); North Nibley (too little); Upton St Leonards (too little)
- Tier 4a: Cambridge (Wisloe) (too much); Eastcombe
- Tier 4b: Haresfield (too little)
- Undefined / countryside: Standish (too much); Nupend (too little)
- Additional or alternative sites promoted as a means of improving the balance / consistency of growth distribution via the settlement hierarchy. Including sites at: Dursley, North Nibley, Cam, Berkeley, Hunts Grove/Hardwicke/J12, Whitminster, Kingswood, North Nibley, Eastington, Painswick, Nupend, Haresfield
- Unclear what “new development should be located in accordance with the ... settlement hierarchy” means in practice
- The hierarchy should be used to classify settlements, but should not be used as the means for locating new development: the policy should set out other factors which will determine the exact level of development appropriate at each specific settlement within the hierarchy
- Rather than a settlement hierarchy, growth points should be located to maximise use of existing infrastructure and services: this is where the demand is and would minimise impact on the environment and pressure on rural areas
- In the AONB (and its setting), the principle of the settlement hierarchy needs to be balanced with: (i) the statutory duty to have regard to the purpose of AONB designation; and (ii) national policy and planning practice guidance relating to AONBs
- Higher tier settlements within the AONB should not necessarily be expected to accommodate the same level of housing provision as they would if they were located outside the AONB. Development in AONB should primarily be based on: (i) robust evidence of need arising within the AONB, with (in the case of housing) priority being given to the provision of affordable housing in perpetuity; (ii) the capacity of the landscape to accommodate the proposed development
- The Hierarchy applies an artificial and unjustified constraint to genuine development opportunities at lower tier settlements; Excessive focus on growth at established top tier settlements and/or over-reliant on creating new settlements: this strategy curtails the ability of lower tier settlements to maintain population levels (due to reducing household sizes) and sustain services and facilities – much less to grow and thrive; There is scope to make allocations at Tier 3b settlements
- Aspects of CP2 and CP3 are unclear, inconsistent with national policy, not positively worded, or fail to maximise the development and growth opportunities available. Could be rectified by identifying indicative housing targets for each ‘Parish Cluster’ area, including a windfall allowance, based on each area’s respective sustainability credentials and capacity to accommodate development



- The plan is inconsistent / the intentions of the hierarchy are undermined by the strategic distribution of growth: e.g. whilst claiming to support, sustain and rejuvenate the services and facilities in the District's towns, the new settlement at Sharpness will pull resources away from the existing "Main Settlements" and "Local Service Centres", particularly Berkeley – which has not been identified as a main focus for support

Defined settlements and settlement development limits:

- Note: a small number of comments revealed a fundamental misunderstanding or confusion between the status of a 'defined settlement' / 'settlement development limit' in Local Plan terms, and the wider 'parish' / 'parish boundary', village or undefined hamlet
- Question the policy approach to settlement development limits in relation to sustainably located 'undefined' settlements, such as Nupend. All brownfield sites should be considered on their own merits; development in a small settlement should not be discounted just because the settlement does not have a SDL
- Tight drawing of SDLs stifles sustainable development: either significantly widen SDLs to allow growth, or provide greater flexibility in the housing policies to allow development adjacent to SDLs to come forward, where demonstrably sustainable

Relationship to other Core and Delivery policies:

The cross-cutting nature of **CP3** elicited objections about aspects of the policy that arise from, relate to or reiterate criteria contained in other plan policies, including: housing delivery and 5 year supply (**DHC1, HC1, DHC2, CP2**); strategic and local site allocations (**CP2** and individual sites); exception sites, affordable housing and local need (**CP9, DHC2, HC4, DHC4, CP15**), particularly within the AONB; the use of settlement development limits as a policy tool, particularly development outside / adjoining settlement development limits (**CP15, HC4, DHC2, DHC3, HC1**). The points raised are summarised elsewhere.

Suggested wording changes

- Suggested re-classification of specific settlements are summarised over the page
- Remove the statement about "exceptionally" permitting development outside the SDL, or provide greater clarification. This phrase is a green light for developers to manipulate and is open to misinterpretation, including through planning appeals. It is therefore a risk to villages like Leonard Stanley
- The distinction between 3a and 3b designations is not carried through the whole Plan document, which sometimes refers just to "Tier3"
- The application of "modest" to describe appropriate level of growth at Tier 2 settlements makes it appear that there is inconsistency within the Plan's strategy (i.e. proposal for 750 new homes at Hunts Grove). Clarify wording to explain that this "modest" allowance would apply to Hunts Grove once it has been fully developed in accordance with strategic site allocation(s)



- The scope of "Tourism/leisure and community uses" and "Tourism/leisure development" must be clarified in supporting text
- The Strategic Policies should be re-sequenced so that they are all in one section of the Plan. Core Policies should be considered as Strategic Policies, which set out the overall strategy for the pattern, scale and quality of development and address the strategic priorities of the area / any relevant cross boundary issues to provide a clear starting point for non-strategic policies.
- Clarify ambiguity and/or correct wording inconsistency throughout the Plan when referring to Minchinhampton Parish or town; and description of Painswick as town or village

Clarification / amendments to the CP3 diagram (fig.3):

- Combining Tier 3a and 3b is confusing. If the tiers are indeed distinct, with distinct development strategies, they should be visually separated
- The full working definition of the new term "affordable" is needed to understand the diagram, as this is an expanded term and encompasses various types of market housing
- Resolve apparent inconsistency in the housing allocation: "within and adjoining the SDL", Painswick is allowed "30% affordable housing"; whilst "adjoining the SDL" housing allocation will be restricted to "100% affordable housing"

Relationship to other Core and Delivery policies:

The cross-cutting nature of **CP3** elicited numerous suggested changes relating to wording that arises from / relates to other plan policies. Including comments about self-build / custom-build (**HC3**); exception sites, affordable housing and local need (**CP9, DHC2, HC4, CP15**), particularly within the AONB; town centres and retailing (**CP12**); tourism and leisure (**EI10, EI11**). There were also requests to re-draw or amend settlement development limits. The points raised are summarised elsewhere.

Settlement classification and impact on specific named settlements, including suggested changes

Berkeley

- **Tier 2** classification is correct: functions as a (small) District centre and 'Local Service Centre' – however, role and function is threatened by strategy (i.e. planned new town at Sharpness)
- Should be **Tier 1**: Berkeley / Sharpness will together become a "Main Settlement"

Bisley, Oakridge Lynch and Eastcombe

- Question the rationale behind designating Bisley and Oakridge Lynch as **Tier 3b** settlements when Eastcombe has been designated a **Tier 4a** settlement: the audit of services and facilities (and resultant tier classification) fundamentally misunderstands the character, nature,



facilities and services of the villages in this area; Eastcombe, being close to Manor Village, is a more sustainable location for development than higher tier Bisley

Bownham

- Consider defining Bownham (Rodborough) as a settlement

Cam and Dursley

- **Tier 1** classification is correct: Cam & Dursley is a high functioning settlement and suitable location for strategic housing growth. (However, dispute the notion that Cam has a very significant employment role/is a primary employment location. It is a dormitory commuter village with a local service centre)
- The policy is unsound because insufficient growth is directed to **Tier 1** settlements (such as Dursley), despite land availability

Chalford

- Should be **3b** not **3a**: Chalford Hill and Chalford Vale function as separate settlements; should be re-assessed and re-classified as two smaller, lower tier settlements

Frampton-on-Severn

- **Tier 3** classification is correct: lacks strategic services and facilities.
- Should be **3b** not **3a**: limited range of local services / facilities; very poor accessibility, with little scope for significant improvement; inappropriate, unsustainable location to allocate growth

Horsley

- Should be **Tier 4**: “basic” facilities, which do not meet day-to-day requirements; Horsley’s small population is comparable with Sheepscombe (**4b**); environmental constraints will prevent growth commensurate with **Tier 3**
- No need for employment growth at **Tier 3b** settlements, such as **Horsley**

Hunts Grove

- “Anticipated” **Tier 2** classification is correct
- Should be a **new Tier** ‘South of Gloucester’ (along with Whaddon / G2), which should be placed above **Tier 1** ‘Main Settlements’, as Gloucester is a city and major urban area

Kingswood



- Should be **Tier 2**: good accessibility, including proximity to **Tier 2** Wotton-under-Edge; KLB secondary school / Wotton Sport Centre make Kingswood a strategic service provider; employment role (and future growth including PS47) is significant and underplayed
- **Tier 3a** status is an artificial constraint on a high-performing, accessible, sustainable settlement; Contrary to the policy's claims, insufficient growth is directed to those **Tier 3a** villages (such as **Kingswood**) that have a range of local facilities and / or benefit from good transport links to strategic facilities at nearby towns, to fully compensate for the constraints faced by **Stroud** and **Wotton-under-Edge**
- Should be **3b** not **3a**: overemphasis on proximity to **Tier 2** Wotton: in reality, there is a lack of safe, sustainable transport links; infrastructure / services / facilities are limited (e.g. village school capacity); continued high rate of growth (via PS38) is unsustainable

Minchinhampton

- **Tier 2** classification is correct: functions as a (small) District centre and 'Local Service Centre'

Nailsworth

- **Tier 2** classification is correct: functions as a strategic District centre and 'Local Service Centre'; important employment role must be maintained and enhanced, including town centre's role

North Nibley

- As a **Tier 3b** settlement, **North Nibley** would receive no housing allocation; allocations (over and above "development to meet specific local housing, employment or community infrastructure needs") should be distributed more evenly to lower tier settlements like North Nibley, which are capable of meeting some day-to-day needs

Painswick

- **Tier 2** classification is correct; although constrained, there is potential for further growth, in line with **Tier 2** status; change to Tier 2 should be paired with amendments to the policy wording, to ensure the hierarchy is applied in a nuanced way when determining appropriate places for future growth
- Should remain **Tier 3**: justification for move is unclear or unsound; evidence base is outdated / incorrect re. retail provision; lacks multiple facilities, shops and varied employment opportunities seen in other Tier 2 settlements; Painswick has a dormitory function and is reliant on Stroud; inappropriate, unsustainable location to allocate growth; environmental constraints will prevent growth commensurate with **Tier 2**

Standish



- **‘Countryside’** status is correct: welcome clarity about the definition of Standish Parish (outside the strategic allocation PS19a) as “countryside” (para. 2.13); clarifies the previous ambiguity of Standish “parish” within the settlement hierarchy

Upton St Leonards

- Should be at least **Tier 3a**: has equal or better accessibility to facilities compared to 7 other higher-classified settlements (**Tier 2** and **3a**); and equal or better provision of community services and facilities than 10 of the **Tier 3a** settlements; **Tier 3b** status would constrain an accessible, sustainable settlement: allocations should be distributed more evenly to areas which have good access to strategic and local facilities such as Upton St Leonards

Whitminster

- Should be **Tier 2**: accessibility is underestimated / misrepresented (it is better than Tier 2 Frampton-on-Severn); well-located, benefits from proximity to higher order settlements and strategic services; scope for accessibility improvement due to A38 public transport enhancements; employment role; services, facilities and availability of land suitable for development make this a sustainable location for strategic housing growth; strategic growth could transform Whitminster into a Tier 2 settlement

Wisloe

- Should be “Anticipated” **Tier 3a**: within the lifetime of the Plan, Wisloe will begin to function as an established settlement. For consistency, the policy and/or supporting text should be altered to acknowledge its future role as a ‘Tier 3a Accessible Settlement with Local Facilities’

Council’s response

The Council considers the settlement hierarchy will help to deliver sustainable development and is in conformity with national policy. The evidence base for the settlement hierarchy is considered to be sufficiently broad to assess the roles and functionality of the District’s settlements, relative to each other, and no changes to individual settlements’ classification is proposed. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- In supporting text, clarify relationship between the settlement hierarchy and the development strategy’s distribution of growth to sustainable locations
- In supporting text, clarify that the hierarchy is based upon the roles and functionality of the district’s individual towns and villages, relative to each other; explain breadth of criteria used to assess and rank the settlements
- Carry out a light-touch review of existing settlement role and function evidence; specifically in relation to Chalford, Kingswood, Painswick, Frampton-on-Severn, Upton St Leonards, Horsley and Whitminster
- Amend settlement descriptions in Chapter 3 (Making Places): delete reference to “post office” at North Nibley; delete reference to “bank” at Nailsworth and replace with



“building society” (these updates make no material change to these settlements’ classification)

- In supporting text, the phrase “exceptionally” will be retained (in relation to development adjacent to SDLs); but expand to explain that the suitability, nature and extent of any such development will be defined through the Local Plan’s other Core and Delivery Policies
- Amend DHC2 (Sustainable Rural Communities) to extend the principle of allowing small schemes of up to 9 dwellings outside SDLs to Tier 3a settlements as well as Tier 4, providing a more balanced development strategy for Tier 3b settlements; alter fig.4 diagram for Tier 3 settlements accordingly
- Provide additional emphasis throughout the Plan on the duty to have regard to the purpose of AONB designation, but reflect the need to support the social well-being of communities through housing where justified to meet local needs
- Delete reference to some Tier 3a settlements outside the AONB potentially having scope to help meet the housing needs of more constrained Tier 1 or Tier 2 settlements
- Avoid reference to “Tier 3 settlements” throughout the Plan; refer instead to Tier 3a and Tier 3b settlements as appropriate
- Retain Hunts Grove as an “anticipated” Tier 2 Local Service Centre; but add supporting text to clarify the envisaged role and function of the planned new settlements at Sharpness and Wisloe, as well as Hunts Grove
- In Chapter 3 (Making Places), make reference to the anticipated Tier 2 status of the new settlement at Sharpness and the Tier 3a status of the new settlement at Wisloe
- Add supporting text to clarify the mechanism for defining Hunts Grove, Sharpness and Wisloe as new settlements with their own SDLs through future Local Plan Review
- Add supporting text to clarify that the scale and nature of growth and development at the planned new settlements is determined through their respective site allocation policies and subsequent planning applications (not through CP3)

Core Policy CP4 Place Making

Support comments

- Will have a positive impact on physical activity, active travel & social /community sustainability
- Give consideration to site topography as part of place shaping as it is not always given sufficient consideration particularly where land is raised near watercourses
- Excellence in design should be the aim
- Place shaping should recognise the protection of existing Public Rights of Way which are historic assets and the benefits of new multi-user tracks to the community
- Support community projects such as composting sites
- Should take account of made NDPs
- New development should embrace the concept of restoration

Objection comments



- Nice idea but the mini-visions are not realistic and need to be reconsidered in line with the true views of existing residents and businesses
- It is no good trying to minimise car ownership. A car is essential for any meaningful life
- Object to creation of new settlements that are really the joining up of smaller rural places
- It is contradictory to protect and enhance local character and yet at the same time propose new settlements that will change the character

Suggested wording changes

- It is unclear if the listed requirements are all to be achieved. It would be more clear if the list of requirements ended with '; and' rather than just ';'.
- Add "All development proposals shall accord with the Mini visions and, where relevant, neighbourhood development plans"
- Encourage an emphasis on reducing inequalities and making sure that places are inclusive.
- Require development in the AONB and its setting to have regard to (and be consistent with) the AONB special qualities, landscape and settlement character and policy, guidance and evidence
- Recognise the importance of providing particular uses (including schools) for place-making
- Revise to accord with the ten characteristics contained within the National Design Guide or adopt a local design guide and refer to it in the policy
- Remove references to guidance and SPD in the policy and if placed in supporting text refer to the Council only having regard to it
- Acknowledge the potential carbon reduction impacts of supporting the adoption of increasingly progressive waste management-related measures. For example, the latter part of point 3 could be revised to read; "...and provide adequate storage (but not exclusively external) space to facilitate efficient and effective high quality waste recycling and disposal..."

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed: Include reference to the National Design Guide (MHCLG, 2019) in the supporting text.

Core Policy CP5 Environmental development principles for strategic sites

Support comments

- Core Policy CP5 lacks any explicit reference to achieving carbon neutrality
- There are no "teeth" involved in this Policy to ensure that developments are low impact in terms of environment
- Item 1 "appropriate" and "acceptable" could be stronger to indicate that the highest standards are applied. Should be defined by those who already live within the area
- These sites need to have the supporting infrastructure and services scaled up to match the increased population



- It is vital that any site developed adheres to waste hierarchy opportunities at or near production. A community composting site will contribute to this
- Support policies that require SuDS and encourage water resource efficiency. We encourage the optional higher water efficiency target of 110 Litres per person per day within part G of building regulations
- Support the improvement of building quality and minimising environmental impact from developments, subject to balancing the need for sites to be deliverable
- Categories A to G are very good
- Would a strategic site not warrant a Construction Environmental Management Plan (CEMP) as a matter of course?
- How robust is this? Will developers be able to argue viability?
- The criteria are sensible but needs to be cross referenced to viability and the reality of the actual delivery of the end result

Objection comments

- There were no specific objection comments raised

Suggested wording changes

- CP5 should contain a principle that reflects the strengthened 'over-arching priority' to achieve carbon neutrality and requirements set out in delivery policies
- SO5 objectives should be included in the policy
- Criteria 1 and 2 should contain references to a measure in the policy for a which a developer can demonstrate accordance to, to avoid ambiguity for developers and decision makers
- Criteria 2 of the policy is vague and requires further explanation. By their nature, strategic development sites use large amounts of land resource, and are likely to have significant environmental effects, which can be either beneficial and/or adverse, and some of which can be offset by appropriate mitigation measures
- Criterion 5 should require future proposals to demonstrate accordance with either a locally adopted design code or the national model
- Add a criterion 6 to refer to enhancing flood storage, opening up culverted watercourses and improving water efficiency
- Require sites to provide high quality GI, citing the Building with Nature benchmark standards for Green Infrastructure as a way to demonstrate this
- Require sites to support a dark sites policy
- Amend A to read; "Sustainable sourcing of materials, which demonstrates a high degree of material efficiency through including recycled content and is efficient and durable..."
- Add to E "Minimising energy consumption and improving energy performance through maximising insulation ideally to Passivhaus standard
- Add "H - Minimise impact on the natural environment and optimise the multiple benefits of GI within and beyond the site"
- The criteria are sensible but needs to be cross referenced to viability and the reality of the actual delivery of the end result



- It is unclear if the list of requirements are all to be achieved. It would be more clear if the list of requirements ended with '; and' rather than just ';'.

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Add criterion H to refer to minimising impacts on the natural environment and maximising green infrastructure
- Expand supporting text to refer to the benefits of green infrastructure and support for the Building with Nature standards

Core Policy CP6 Infrastructure and developer contributions

Support comments

- Developers must be forced to deliver everything to the expected standard
- The delivery of infrastructure needs to be completed up front and before a development is occupied
- Infrastructure should be developed at the right time to support the development strategy
- Flexibility is required to include the phasing of payments / infrastructure in alignment with the delivery of housing on site, in order to minimise upfront costs and associated risk
- Support for community infrastructure including the set-up of community composting sites
- Support for a mix of CIL, S106 and other funding to deliver canal towpath improvements
- Pooled contributions are essential to deliver environmental infrastructure required
- CIL should be retained but only for greenfield sites to encourage brownfield development
- Local authorities should/ GCC will seek developer contributions towards the cost of new school places that are needed as a result of housing development
- 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
- Current infrastructure is often inadequate, including school, transport, broadband
- To avoid any confusion, it should be clear which stakeholder is responsible for the request and, where possible, the delivery of each contribution tied to a development
- Guidance should be provided at the pre-application process in order to aid efficiency of the determination process and allow for time for negotiation

Objection comments

- Infrastructure should be there first to support the growth of areas
- The locations of development are wrong if large and expensive infrastructure is required to make it sustainable
- There are limited powers to enforce developer promises/obligations



- Infrastructure is often the last thing to be developed resulting in disconnected communities and a sense of isolation

Suggested wording changes

- Revise to reflect the changes to the PPG on CIL (September 2019) and DfE's guidance on securing developer contributions for education
- Take account of the new requirement for Infrastructure Funding Statements
- Include carbon neutral objectives in policy to assist with prioritisation
- Explain that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth
- Refer to the infrastructure requirements set out in made NDPs: "...in accordance with the District Council's identified priorities and objectives or those of made neighbourhood plans, for delivering sustainable communities"
- Include reference to flood risk projects, green infrastructure and other environmental contributions
- Confirm that strategic allocations will be exempt from CIL owing to the substantial infrastructure costs to be delivered on-site and off-site through S106

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Update references to community infrastructure levy, infrastructure funding statements and the Government's intention to introduce a national infrastructure levy
- Explain that developer contributions can be secured retrospectively
- Refer to infrastructure priorities set out in neighbourhood plans
- Refer to the different types of infrastructure, including flood risk management and education



Section 3.0 Mini visions and priorities

A number of responders submitted supporting and objecting comments covering general themes and issues, which while relevant to one of the specific mini-vision or priority areas geographically, were more relevant to other sections of the plan. For example, while the comments made were specific to these locations such as traffic concerns or individual sites, these comments were not specifically relevant or required a change to the mini-visions or priorities themselves. On this basis all comments have been logged and assigned to the relevant themes or topic areas elsewhere in the plan where necessary. Only comments which were explicitly relevant to changes required in this section of the plan are recorded here.

Suggested wording changes

Stroud Valleys:

- Nailsworth no longer has a bank (although there is a building society)
- Add: “Some or all of the development areas fall within the Cotswolds South groundwater management unit (GWMU) where restricted water is available for abstraction licensing, there may therefore be potential water resource constraints”

Cam and Dursley

- Add: “Some or all of the development areas fall within the Cotswolds South groundwater management unit (GWMU) where restricted water is available for abstraction licensing, there may therefore be potential water resource constraints”

Berkeley Cluster

- The draft vision for this area should revert to the mini-vision contained in the 2015 Local Plan, thereby omitting references to new communities at Sharpness and Wisloe Green and the alleged transport 'improvements' that will flow from them

The Severn Vale

- The Gloucester & Sharpness canal should be mentioned as a multi-functional green infrastructure asset which links many of these disparate settlements together and brings a variety of health & well-being benefits to both residents and visitors to this area. It is implied that the opening of Cotswold Canal will bring new benefits to the area, with no mention of the benefits the existing canal already brings

Wotton Cluster

- Incorrectly lists North Nibley as having a post office



Council's response

The Council considers the section will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- The reference to a bank in Nailsworth has been removed
- Reference to the GWMU is not relevant to the mini-visions and is not appropriate in this section of the plan. The GWMU has been considered in the site assessment constraints and the evidence base relevant to individual sites
- Reference to new communities at Sharpness and Wisloe are relevant and remain in the plan
- Additional wording has been added to the Severn Vale mini-vision, 'The opening of the Cotswold Canal will bring new benefits to the area which will complement and add to The Gloucester & Sharpness canal, which is a multi-functional green infrastructure asset which links many of these disparate settlements together and brings a variety of health & well-being benefits to both residents and visitors to this area.'
- The reference to a Post Office in North Nibley has been removed



Section 4.0 Homes and communities policies

Core Policy DCP2 Supporting Older People

Support comments

- General support for the core policies and appear consistent with NPPF/G requirements
- This policy will have a positive impact on health and wellbeing and is closely aligned with current adult social care policy on lengthening independence within people's own community
- 3. "Promote active lifestyles" should be understood to include the many people still horse riding in their 50s, 60s, 70s and above
- Allow older people to build a house/bungalow in the garden so as to allow them to stay in their community and possibly release their existing house for younger families
- New developments need to improve the bus service to allow older people to access services
- Possibly include sites that offer mixed tenure housing or flexible living arrangements that encourage lifetime homes, including the provision of flexible 'annexes/affordable self-build houses at exception sites to offer independent living with close family support
- Care villages within larger allocations should be included in future master plans. This will reduce land value so they can actually be delivered
- Support for self/custom build homes that support inter-generational living, within new development allocations. Custom build needs to be interesting to drive innovation and good design
- Why promote this with new builds and yet knock down sheltered housing units for redevelopment?? Get control of your housing stock before you build more
- Such requirements will need to be factored into viability appraisals for strategic schemes when establishing what contributions the development can support

Objection comments

- Support principle but do not believe that Policy DCP2 is an effective policy which would result in the delivery of this specific element of housing need. The Council needs a robust understanding of the scale of this type of need across the District and an effective approach for the delivery of this

Suggested wording changes

- We would suggest that it could be strengthened with reference to intergenerational cohesion (i.e. not separate communities) – It should link to CP7
- We would suggest adding a definition of older people within the supporting text: with a reference to the assets older people bring to a community, including employment and volunteering



- Could there be a better description of 'hub' – what are the important connections? This could be drawn from the Barnwood Trust Social Sustainability toolkit
- Recommend that the Plan should include a specific policy in relation to the provision of specialist accommodation for older people (wording provided)

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Widen the policy to supporting people with mobility issues
- Add modelled demand for older persons' accommodation from the LHNA
- Add requirements for adaptable and adapted homes standards from the LHNA
- Update glossary and include explanation of approach in supporting text

Core Policy CP7 Lifetime communities

Support comments

- Support as a concept but the detail is not well developed
- B. needs of those with connections to the area - this is difficult to manage on a fair basis as it can be manipulated
- This is especially important for rural communities and could be adapted to apply in part to rural exception sites not just major development
- This policy will have a positive impact on health and wellbeing and is closely aligned with current adult social care policy on lengthening independence within your own community

Objection comments

- This policy is particularly vague in terms of how it is intended to be applied, resulting in the potential for burdens to be imposed on development that cannot be known by those seeking to bring sites forwards / purchase land and which cannot have been viability tested either in the past or presently

Suggested wording changes

- Suggest that there is further clarification of the meaning of 'lifetime' in this context, i.e. what would this look like in a development / planning application; where would developers get the 'identified long term needs'; who would define these needs?
- It may be useful to include a definition of both lifetime homes and lifetime communities and to clarify the differences between the two concepts



- The policy is unsound and should be deleted. The wording is more akin to that used to describe a strategic objective than a policy requirement and perhaps this is how it should be presented within the SDLPR

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Remove references to lifetime homes and replace with a broader reference to inclusive communities

Core Policy CP8 New housing development

Support comments

- The Local Housing Needs Assessment must be up to date
- More 1st time buyer and starter homes need to be identified for young people. Also more bungalows need to be built for the older generation
- Support for carbon neutral development and for increasing renewable energy opportunities
- Welcome specific reference to biodiversity on site and multi-functional green infrastructure
- Enhancements cannot always be achieved within the site alone and not all green spaces can be fully multifunctional
- The energy embedded in building materials should be considered in decision making

Objection comments

- Opposition to quantum and location of sites for housing and in particular the need for greenfield sites
- Para 5 is not required. This could impose unnecessary costs as climate change from greenhouse gas emissions is not sufficiently important in the context of an international problem

Suggested wording changes

- Change 5. To: "Enable provision of infrastructure in ways consistent with cutting greenhouse gas emissions through a network of safe, off-road multi-user tracks for walking/cycling /riding and motor scooters."
- Change final paragraph to: "Major residential development proposals will be expected to enhance biodiversity on site via a network of multi-functional green spaces and multi-user track corridors, which support the natural and ecological processes."
- Add criterion 6. "All new development shall be demonstrated to achieve carbon neutrality by 2030 without expensive retrofit and without carbon offsetting outside of Stroud District."



- Make reference to Sport England’s Active Design guidance on how the design and layout of new developments can be planned to make communities more active and healthier and some of the principles in this guidance could be incorporated into a new criterion in the policy
- More explicit reference to off-site as well as on site enhancements for biodiversity. Reasoned justification should ensure that ‘major development’ is defined

Council’s response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Supporting text to be amended to reflect points raised regarding major development supporting multi-user networks and design supporting active and healthier lifestyles

Core Policy CP9 Affordable housing

Support comments

- General support for policy which appears consistent with NPPF/G requirements
- Including a target is positive as it allows for measuring affordable housing delivery against need
- Support for 30% affordable housing requirement due to need
- Support the flexibility provided in terms of the tenure, size and type. This is important to ensure that the housing aligns with local needs and is appropriate for the site
- 30% of 4 houses is more than 1 and less than 2. Suggest % variation to achieve a whole number
- The approach should be more flexible so that where appropriate commuted sums for off-site provision is also acceptable
- There should be no requirement for on-site affordable housing where sites are less than 10 units. A cash sum should be secured in lieu for provision elsewhere
- Where there is a requirement for under 4 affordable houses, pooling to provide a larger site at a more sustainable location should be considered to avoid social exclusion and isolation
- Include discussion of ‘other affordable routes to home ownership’ as NPPF para. 64 requires major developments to provide at least 10% of homes for ‘affordable home ownership’
- Clarify that affordable housing is subject to viability and negotiations, to take account of the specific circumstances of sites, exceptional development costs, viability, the availability of public subsidy, or the realisation of other planning objectives which take priority
- Provide some recognition to the NPPF minimum requirement for 10% affordable provision on major development proposals, and how this may be taken into account where abnormal infrastructure costs would otherwise prejudice the site delivery
- The quantity of affordable housing provision can be increased by increasing the capacity of site allocations in the local plan review



- Within the Cotswolds AONB there should be 50% affordable housing on sites capable of taking two or more dwellings. It should be based on robust evidence and provided in perpetuity
- Due to need, landowners of sites on the edge of settlement boundaries and in small villages should be actively encouraged to come forward with sites for affordable housing
- Should acknowledge, identify, and include the full range of affordable housing tenures which are considered acceptable, including: Affordable housing for rent, starter homes, discounted market sales housing, and other affordable routes to home ownership (NPPF para.62/Annex 2)
- Consider differentiating between social and other forms of affordable housing as some 'affordable' housing is often still unaffordable for people in receipt of universal credit
- The situation will continue to worsen without effectively a 'presumption' in favour of affordable housing being set out within the policy
- There should be a minimum room size. Affordable housing can be small and cramped. Internal space is important to a resident's ability to live healthy lifestyles and mental wellbeing

Objection comments

- The Policy is unsound as the annual affordable housing need is more than 50% of the Plan's housing target. Therefore, the Policy cannot deliver enough affordable housing and fails as a whole to assist in "significantly boosting the supply of homes" (NPPF para. 59)
- There is no evidence in the LHNA as to how the different levels of affordable housing provision (i.e. the threshold sizes of development, either 4+ or 10+ dwellings above which contributions will be sought) have been derived
- Thresholds should not be raised. Rural communities want more not less
- Need to stop developers putting in multiple applications for 9 dwellings to avoid the threshold.
- Spend more time looking at shared ownership rather than local authority provision
- It is unclear as to how the identified need for affordable housing for those who aspire to home ownership, but cannot afford to, is to be met
- Provide affordable housing in towns where there is public transport and employment options, not in rural areas where lack of a car can lead to isolation, poverty and mental health problems
- The policy does not include any reference to a viability and deliverability testing mechanism to establish the ability of individual sites to make contributions towards affordable housing needs
- In the absence of an adequate viability assessment the targets presented are not supported by appropriate evidence and are therefore unjustified

Suggested wording changes

- Paragraph 1 should be amended to reflect the need in the LHNA of 344 dwellings per annum.



- The latter half of the second sentence in the second paragraph should be deleted
- The reference to the Cotswold AONB should be deleted from the start of the third paragraph.
- Need to clarify the list of rural parishes in paragraph 3 where the lower threshold applies. Amberley is listed as a rural Parish but it is in fact part of Minchinhampton Parish
- The words 'at least' should be deleted from paragraphs 3 and 4
- Add "subject to viability" to the end of Paragraph 4
- Add to final paragraph "The Council will negotiate...having regard to housing needs, viability, site specifics and other factors."
- Add - The provision of affordable housing is non-negotiable, unless it is to increase it
- Add at end: "In doing so, the Council shall seek to deliver at least 10% of the homes available on each site to be available for affordable home ownership (as part of the overall affordable housing contribution to the site) subject to the provisions of prevailing national planning policy in this respect."
- Add to end: "If it is demonstrated the site would not be deliverable with a 30% affordable housing provision, a reduced provision will be acceptable providing it is supported by a robust viability assessment."
- There is an inconsistency in reference to the lower site threshold in Designated Rural Areas which is referred to as either 5 or more or 4 or more dwellings. This should be corrected
- A definition of affordable housing is required
- Include an explanation of the rent to buy model within the supporting text
- Recommend wording on the distribution of affordable housing within developments and their integration within the overall design. Small clusters of approximately 10 to 15 dwellings is typically preferred by Registered Providers

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Update target requirements for affordable housing to reflect LHNA.
- Add supporting text wording to reflect NPPF para 64 seeking at least 10% affordable home ownership on major development
- Substitute the word 'area' for Parish – some designated rural areas are not parishes in their own right
- Add supporting text referring to the Council's council house building programme
- Update glossary and include explanation of approach in supporting text

Core Policy CP10 Gypsy, Traveller and Travelling Showpeople Sites

Support comments

- General support for core policy which appears consistent with NPPF/G requirements



- Support provision of traveller sites to comfortably meet traveller's needs
- Positive impact on health and wellbeing - specifically housing; access to services, particularly education and health. This is a group which can experience health inequalities
- Could there be less emphasis on these sites as a problem, and more on how to positively plan to tackle health inequalities, integration, community cohesion, etc.?
- Through joint working across boundaries, we would expect authorities adjacent to Stroud to be made aware of the evidence and outcomes of this work to help inform their own G&T policy and evidence base preparation

Objection comments

- Such sites if they must be provided need to be kept far away from established residential and commercial areas and properly policed.

Suggested wording changes

- Add text to say that we would engage with this community and the communities where sites are, to meet their needs and the needs of the communities where these sites exist.

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Update target requirements to reflect latest Gypsies, Travellers and Travelling Showpeople Accommodation Assessment and current supply position
- Refer to addressing cross boundary requirements
- Add wording to assess and address community needs and matters of community cohesion
- Update glossary and include explanation of approach in supporting text

Delivery Policy DHC1 Meeting housing need within defined settlements

Support comments

- Brownfield development must be made easier

Objection comments

- By restricting growth in some areas, you force unsuitable sites forward. Some places can grow outside the settlement boundary, so let them
- The statement above goes beyond the NPPF statement of "presumption in favour of sustainable development"
- Will lead to higher density of development within SDL's than is considered appropriate



- There may be sites adjacent to but outside of SDLs which are sustainable, would not result in material harm and would assist the Council in meeting their housing need
- A blanket restriction on new housing does not meet the requirement to boost housing supply and sustainable growth as sought by the NPPF and would render the policy unsound

Suggested wording changes

- Policy criteria that apply should be more clearly defined
- Any redevelopment of any house within a settlement should reflect the character, scale and setting of the houses within the immediate residential locality. Where there is clearly space for an additional house on the site, this should be considered, subject to environmental considerations as set out in HC1
- For the sake of clarity, land within strategic development sites should be included within the defined settlement boundaries for each corresponding settlement
- Make more flexible to allow new development adjacent to SDLs if there is a shortfall in housing supply against the plan requirement (failed 5YLS or HDT)
- Make policy more flexible for sustainable development. The Council would still have the ability to refuse planning permission for those developments that cause harm

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Add supporting text to explain the purpose of settlement development limits and link to criteria in policy HC1

Delivery Policy DHC2 Sustainable rural communities

Support comments

- Support the principle and aims of this policy.
- Positive impact on health in terms of housing affordability and availability and social sustainability in villages
- Accords with the NPPF and the contribution smaller sites can make to meeting needs.
- Could it be made even clearer that this only applies to Tier 4 settlements?
- Should be extended to Tier 3 settlements as these are more sustainable settlements than tier 4 settlements and do not include any proposed housing allocations in the SDC Draft Plan
- It would be appropriate to apply the criteria to all tiers of the settlement hierarchy
- Would like to see 40% affordable for schemes above 4 outside of SDLs
- Strongly support the requirement for schemes to be supported by NDPs/ parish councils
- Clarity is needed on exactly what is meant by 'at 2020' (for example, a specific date)



- Consider that if there is a proven need for more dwellings at a location, the development of more than 9 dwellings should be considered favourably to address the identified need for housing in that area
- The limit on the cumulative increase in settlement housing stock should be more restrictive for individual developments in the AONB

Objection comments

- Object to further development at small communities which will force locals out
- In terms of providing affordable housing, this is a weakening of the current situation where there is an assumption that all development outside the developments should be affordable in perpetuity
- Has the potential to undermine the rural exception site by giving fringe sites open market value and thereby squeezing out any future rural exception schemes
- In a small village made up of dispersed housing in undulating terrain within the AONB, a scheme for 9 new houses could look rather out of place
- This does not respond to the individual needs of local communities in anything other than a restrictive and numeric manner
- There is no material link with sustainability, which is what the policy suggests is its objective

Suggested wording changes

- Remove reference to up to 9 dwellings and refer to 'suitably proportionate' or 'proportional growth', relative to the size of the settlement to which they would relate or "small scale", allowing the DM process to consider the merits of the application or 'growth that needs a specific local need'
- Make explicit references to opportunities for growing food, sustainable transport and land based 'green' jobs as components of sustainable rural communities
- For settlements within the AONB the scheme size should be limited to 5% of the existing housing stock and a cumulative increase of 10%
- Add: "6. The proposal enables local land workers to plan long term to live and work on their holding, the permission conditional on continued land activity."
- Should be extended to allow for development within brownfield sites adjacent/ that relate well to all settlements including those without a settlement boundary
- Should be extended to Tier 3 settlements

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Extend policy to cover Tier 3b settlements
- Support the redevelopment of brownfield land on the edge of settlements, subject to satisfying the criteria



- Consider specific support for self-build, live-work and build to rent properties, subject to meeting demographic need
- Update glossary and include explanation of approach in supporting text

Delivery Policy HC2 Providing new homes above shops in our town centres

Support comments

- Support the potentially positive impact on health in terms of housing affordability and availability and sustaining vibrant communities
- Support provided the conversion results in a low carbon dwelling
- Should be flexibility in allowing ground floor uses to change too. Retail areas must contract as it is pointless to insist retail frontages are maintained when there is no demand
- Should consider extending the policy to converting whole shopping streets to residential uses. This would revive the ailing town centres and provide brownfield housing sites
- Bring the 1600 empty homes back into circulation first

Objection comments

- Will exacerbate parking problems in town centres as most houses have at least 2 cars

Suggested wording changes

- Add a caveat that in considering permission, account will be taken of any local parking problems
- Any potential impact on health in terms of noise, odour, community safety, community cohesion could be mitigated through enhanced wording in the policy to manage these concerns

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Amend to reflect parking and amenity issues raised

Delivery Policy HC3 Self-build and custom build housing provision

Support comments



- Support as policy likely to have a positive impact on health in terms of housing affordability and availability and social sustainability
- Support for cross subsidised multi plot self build adjacent to development limits
- Single plot self/custom build should not be limited to affordable only
- Self builds do not want to be limited to strategic allocation sites, as the design fabric can be limited
- Policy should be underpinned by allocations for sites either including self build and custom built houses or indeed exclusively of that category. Schemes could come forward with a mix of 50/50 and could be centred upon provision of affordable homes
- Thought should be given to the Exception Policy being broadened to provide self build and custom built within that description
- Need to embed the ambition for carbon neutral development
- 2% requirement will be challenging as strategic sites are promoted by volume housebuilders is likely to be challenging. Need for stronger policy on delivery
- How would this demand be demonstrated?

Objection comments

Needs

- The Council's Self & Custom Build Register alone is not a sound basis for setting a specific policy requirement. This should be supported by additional data from secondary sources to understand and consider future need for this type of housing
- Charging individuals to be on the self build register has clearly reduced the numbers on the register. This is not a true reflection of demand
- There is no evidence to demonstrate demand for 2% self-build or custom plots on the strategic allocations

Site requirements

- Policy is not supportive enough for those who do not qualify for affordable housing yet also do not wish to live on a huge new housing estate
- Decent (size, location, gradient) plots rarely come onto the housing market and when they do, they are far too expensive for average local families to 'win'
- Major housebuilders will allocate the smallest, most costly-to-develop plots on the site unless they are forced to do otherwise. These plots will not be an attractive proposition to most self builders, the developers will then argue there is no market demand for self build plots
- SDC could be far more engaged with the self build community, promoting sites owned by the authority as custom build sites
- The Council should use its own land, engage with landowners and work with custom build developers rather than require strategic sites to provide a proportion



- The Council should seek to allocate small to medium sized sites of between 5 and 20 units specifically for 100% CSB. Self-builders would rather build their own home on a small/medium sized site with other bespoke self-build homes than on the corner of a large housing estate
- Support affordable self-build plots having space for dependents or carers

Strategic sites

- The Government promotion for custom self-build is related to significantly boosting the supply of housing. By simply transferring the self-build provision to strategic sites, Policy HC3 will not have the intended objective of boosting housing supply
- Self or custom build provision will hinder delivery of allocated sites with uncertainty over take-up and scheme completion, which are critical elements for development funding and viability for schemes to progress
- This will sterilise land within strategic allocations which should be made available for standard forms of housebuilding (market and affordable)
- Custom built homes are normally bespoke in terms of site selection and design, which is not compatible within a strategic scale development site
- It is the Council's responsibility, not that of a land owner or developer, to ensure that sufficient permissions are given to meet demand

Settlement limits

- Outside defined settlement limits any development should be subject to Neighbourhood Plan/parish council approval
- Settlement development limits (SDL) must be maintained and strictly enforced. Permitting "suitable development adjacent to settlement limits" is an invitation to speculative development

Suggested wording changes

- Impact on landscape value should be added to the list of criterion
- Needs to be clear statement whether this policy applies to all allocations or just strategic allocations
- Should include a mechanism whereby if the self-build and custom-build plots are not brought forward within a given timeframe then the plots revert back to market housing
- Specific self/custom build allocations should be provided on site specific allocations
- Amend to support the provision of single plot custom and small to medium sized CSB proposals adjacent to settlement limits, where it will not result in an unacceptable protrusion into the open countryside
- The policy wording requiring 2% of strategic allocations to consist of self-build/ custom build dwellings should be deleted



- The Council should re-visit the decision to apply fees as this hides the true un-tapped demand and is therefore counter-productive to the district's strategic aims

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Clarify that self build and custom build housing can be appropriate on sites outside settlement development limits, in accordance with policies DHC2 and HC4
- Strengthen requirement for locally derived demand to be demonstrated
- Make clear that on strategic sites development briefs will set out how the plots will be delivered and integrated into the wider scheme
- Clarify in supporting text that other evidence of local demand will be considered
- Include within the supporting text ways in which the Council will actively support the provision of plots, including through investigating opportunities on Council owned land
- Refer in supporting text to the intention to produce a Supplementary Planning Document to provide more guidance and detail on the delivery of self-build and custom built housing

Delivery Policy HC4 Local housing need (exception sites)

Support comments

- Positive impact on health in terms of housing affordability and availability, space standards and social sustainability in villages, but a very broad policy
- Support principle of exception sites for affordable housing only and therefore suggest revert back to the current HC4 policy
- Consider differentiating between social housing and affordable housing. Social rents are pegged to local incomes to keep rents more affordable
- Exception sites should remain a primary opportunity for the provision of social housing, with any market housing including entry level housing
- By allowing types of market housing on rural exception sites there is a considerable risk that the price of land at the edge of settlements will escalate that will make the opportunities to buy land by Community Land Trusts far more limited if not impossible
- Does the reference to "some" market housing in line 1 of Local Plan para 4.13 imply entry-level and self-build or custom build as these are versions of market housing?
- Exception sites should not just be for affordable housing, but for self-build housing, older persons housing and small cheaper dwellings
- There are some very successful local plan policies that provide opportunities for affordable self-build, but the audience numbers are relatively limited
- Policy must take into account impact of development on the landscape value
- Do not support policy referring to viability which often means protecting developer profits. I would prefer this replaced with support for community land trust provision



Objection comments

- Does not explicitly quantify the percentage of affordable housing that should be provided on such sites or quantify the minimum percentage
- Does not distinguish between 'rural exception sites' (RES) and 'entry-level exception sites'
- Does not quantify what constitutes 'small sites'
- Does not specify that the housing must be affordable in perpetuity
- Support principle but object to weakening of policy opening up to market housing
- If a company cannot proceed with a site due to financial mismanagement, then the site should be sold on to another company or to the council for social housing or self-build only
- Allowing market housing leaves the door open to intrusive new developments and will encourage further speculative applications
- Should apply only to tier 3a and above
- Sites of this nature should not be within the AONB

Suggested wording changes

- Amend criterion 3 to put back in references to "in perpetuity" to comply with the NPPF.
- Add criterion for decision makers to take into account impacts on landscape value – e.g. should not exceed the capacity of the landscape to accommodate that provision
- Add "6. The proposed construction meets sustainability requirements for new build dwellings and appropriate additional measures to enhance the energy efficiency of the existing dwelling or unit are undertaken."
- Specify for the Cotswolds AONB a target of 100% affordable housing for exception sites.
- Specify that exception sites should not lead to a cumulative increase of more than 5% of the settlement housing stock/size at 2020, or be larger than one hectare (whichever is smaller)
- Specify that entry-level exception sites will not be permitted in areas or assets specified in footnote 6 of the NPPF, including the Cotswolds AONB
- Definition of local need should be expanded to include neighbouring parishes in order that those living in neighbouring areas, but with a local link, can be accommodated
- Supporting text should be explicit in limiting provision to affordable housing (mainly social rented), a small element of entry homes and affordable single plot self-build homes
- Define affordable housing in the supporting text and include the NPPF definition of Rural Exception sites in the Glossary
- The term de minimus (last sentence of the policy) should be explained in the Glossary

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Put back in references to "in perpetuity" to comply with the NPPF



- Consider defining what “some” market housing means in practice
- Consider refining the cumulative growth allowed, to reflect the location and size of settlement
- Refer to the intention to produce a Supplementary Planning Document to provide more guidance and detail on aspects such as the level of detail required to prove the need to include market housing on exception sites, and further information on self-build proposals brought forward under this policy
- Update glossary and include explanation of approach in supporting text

Delivery Policy DHC3 Live-work development

Support comments

- Support the positive impact this policy could have on health in terms of enabling people to live and work in a rural environment and in helping to build thriving sustainable communities
- Provides an enhanced opportunity for sustainable development on the edge of existing settlements in line with the NPPF paragraph 82
- Welcome support for flexible forms of accommodation with employment use
- Stroud is a perfect location for live/work units and the ability to deliver this as part of the creative community of the Stroud District is obvious. The delivery of live/work units should be encouraged within developments where appropriate
- Although there is theoretical and potential demand for this type of property the ability to purchase is almost impossible - pressure should be put upon politicians to allow those with a private pension pot to be able to purchase a property which is both commercial and residential. At the same time building societies and banks should be encouraged to provide a mortgage to a new owner occupying the property both commercially and residentially
- Need to embed the ambition for carbon neutral development

Objection comments

- Why shouldn't provision be allowed further away from settlement development limits? If they are live/work units they will be as sustainable as other locations
- Provision should only exceptionally be outside but adjacent to settlement development limits

Suggested wording changes

- Any development adjacent to SDLs must take into account its impact on the landscape value. This requirement should be added to the list of criterion
- The wording in criterion 2 is confusing

Council's response



The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. No changes are proposed in response to comments received from public consultation.

Delivery Policy HC1 Detailed criteria for new housing developments

Support comments

- Very good policy
- Support the need for criterion 1 considerations to be made in relation to the specific locality and note that site specifics may also have an influence on this
- Support the use of the term “where appropriate” within criterion 2 as it allows an element of flexibility and for proposals to be considered on a site by site basis
- Any losses of natural habitat should be catered for by an improvement in other natural habitat gains
- High density schemes are ugly and not nice places within which to live
- Need to embed the ambition for carbon neutral development

Objection comments

- Satisfying all criteria is very restrictive and less permissible than suggested by Core Policies CP2 and CP3. Suggest a more flexible policy approach should be applicable if the Council was unable to demonstrate a 5 YHLS and / or failed HDT
- Seems to contradict Policies HC3, HC4 and DHC3 by allowing general (rather than “exceptional”) development on adjacent to SDL locations. The policy needs strengthening
- Not all of the relevant Cotswolds AONB Landscape Strategy & Guidelines are included in the criteria, nor do the criteria adequately address the Cotswolds AONB Management Plan and other relevant guidance

Suggested wording changes

- Any redevelopment of a house within a settlement should reflect the character, scale and setting of the houses within the immediate residential locality
- "Green space" should encompass PROWs and would be better protected if clarified. Amend criterion 4 to read: "It would not cause the loss of, or damage to, any open space or PROW which is important to the character or community connectivity of the settlement."
- Amend criterion 4 to be more precise: “4. it would not cause the loss of, or damage to, any designated open space ~~which is important to the character of the settlement, unless it can be demonstrated the benefits of doing so outweigh the harm to its loss~~”
- Criterion 5 should be revised to state the developments should not lead to loss or degradation of important wildlife habitats or ecological networks and should deliver enhancements in-line with Biodiversity Net Gain requirements



- Criterion 5: Need to define what is meant by 'locally valued habitat'
- Criterion 5: Would like to see an explicit reference to the positive planning of biodiversity net gain, over and above the principle of no loss
- Refer to Sport England's Active Design guidance which sets out how the design and layout of new developments can be planned to make communities more active and healthier. Some of the principles could be incorporated into a new policy criterion
- The policy should also require that development proposals in the AONB and its setting have regard to (and be consistent with): relevant AONB special qualities; the Cotswolds AONB Management Plan and other relevant guidance produced by the Board
- Strengthen by changing the hierarchy of design that supports active travel and by including reference to access to walking and cycling routes where appropriate
- Advocate the inclusion of references to bike storage
- Include a requirement to support dark skies objectives
- Criterion 8 refers to the need for sites not to be subject to any other over-riding environmental or other material planning constraint. This clause is not necessary within this policy as it is covered by national planning policy

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Changes to criterion 4 to widen the definition of green space to include PROWs
- Changes to criterion 5 strengthening references to protecting habitat from degradation and supporting biodiversity net gain
- Changes to criterion 9 strengthening references to active travel
- Supporting the redevelopment of brownfield land and remediation of contaminated land
- Changes to the supporting text to support innovative and contemporary design
- Update glossary and include explanation of approach in supporting text

Delivery Policy DHC4 Community-led housing

Support comments

- Positive impact on health in terms of housing affordability and availability and social sustainability - but very broad policy
- Support as it will help to deliver more flexible housing provision, including affordable housing which is not subject to the right to buy
- Could be an appropriate way of providing smaller properties to allow for starter homes, homes for the elderly and for those wishing to downsize
- Self-build and custom build should be exclusively in this policy and removed from HC4



- Support for Community Right to Build as this allows affordable housing to be unencumbered by the right to buy, allowing affordable housing to remain in the community in perpetuity
- Welcome the support for innovative design, particularly where these contribute to the Council's ambition to deliver carbon neutral development

Objection comments

- This policy is not required. There is no reason to give a particular group special mention in a Local Plan unless they are to be given special treatment in decision making. They should not be given any special treatment
- If a site is sustainable and appropriate, then it is irrelevant who is bringing the site forward.
- Must be limited to within SDLs. Should not be allowed as exception sites outside the SDL
- Does not address the issue of achieving community housing in urban areas or provide a basis on which community led housing proposals can be favoured over private development, through, for example, a different application of planning, parking and/or design policies and standards
- Reads more like reasoned justification than policy

Suggested wording changes

- Needs to mention that a bespoke SPD and tailored S106 agreements will be required
- There is no mention of the circumstances within which an element of open market housing on a CLH site will be acceptable

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Consider further references to forms of development which would be enhanced by community led schemes, particularly meeting local rural needs (exception sites), meeting the needs of older people and supporting self-build initiatives
- Update glossary and include explanation of approach in supporting text

Delivery Policy HC5 Replacement dwellings

Support comments

- Potential positive impact on health in terms of maintaining appropriate dwelling size
- Support exceptional sustainable construction standards as a criterion but advocate that these standards should be required of more types of new and altered dwellings
- Whether a replacement dwelling enhances the local area depends on the original dwelling which is due to be demolished



- In certain circumstances it may be better to re-site the new dwelling to improve solar gain or its environmental credentials. These would need to be proven and measurable
- Need to embed the ambition for carbon neutral development
- Strongly support strict policy enforcement as past has seen growth in dwelling sizes

Objection comments

- There were no specific objection comments raised

Suggested wording changes

- Correct criterion 2 by adding a “not” in relation to heritage assets, to read "the building is not a designated or non-designated heritage asset"
- Suggest criterion 3 is amended to allow relocation if strong enough site/building quality improvement evidence provided
- Amend criterion 4 to delete “basic living standard” and replace with “to a high standard” or “higher space standards”
- Add criterion 6: “Replacement dwellings must meet or exceed latest energy and water efficiency and renewable criteria.”
- Include a requirement to support dark skies objectives.

Council’s response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Correct criterion 2 by adding a “not” in relation to heritage assets, to read "the building is not a designated or non-designated heritage asset"
- Reorder criteria and provide some flexibility over location if relocation within the existing residential curtilage would have positive flood risk, landscape or biodiversity benefits

Update glossary and include explanation of approach in supporting text

Delivery Policy HC6 Residential sub-division of dwellings

Support comments

- Support as this is a good way of providing smaller, cheaper housing to wider society
- Potential positive impact on health in terms of maintaining appropriate dwelling size

Objection comments

- There were no specific objection comments raised

Suggested wording changes



- Criterion 1 - Suggest addition of cycle storage
- Amend criterion 4 to delete “basic living standard” and replace with “to a high standard” or “higher space standards”
- Include a requirement to support dark skies objectives

Council’s response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Adding cycle storage to criterion 1

Delivery Policy HC7 Annexes for dependents or carers

Support comments

- Some positive impact in terms of supporting people to live independently for longer
- There is a case for outbuildings to be used for independent accommodation where they would otherwise fall into disuse

Objection comments

- It should be easier to get permission for mini homes in your garden
- The annexe must be part of the main property. Should not be allowed in outbuildings
- Support affordable self-build plots having space for dependents or carers

Suggested wording changes

- The annexe must be part of the main property. Should not be allowed in outbuildings
- Consider making outbuildings acceptable for independent accommodation where they would otherwise fall into disuse
- Consider allowing affordable self-build plots to have space for dependents or carers
- Include cycle storage, charging points, wildlife roosting, nesting, feeding, foraging and hibernation opportunities

Council’s response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Clarify that conversion of an outbuilding would not normally involve an extension to the building



Delivery Policy HC8 Extensions to dwellings

Support comments

- Strongly support as concerned that houses are often extended to such an extent that the original house is dwarfed by the extension
- Potential positive impact in ensuring cramped conditions are avoided
- Support any opportunity to enhance the energy efficiency of the existing dwelling or unit - consideration could be given to whether any local grant schemes exist or whether CIL money, or indeed the SDC carbon offset fund itself, could be put towards this

Objection comments

- There were no specific objection comments raised

Suggested wording changes

- Suggest policy is strengthened to include 'any extension must be subservient to the original property'
- Amend 4 to read “the proposed construction meets....*and appropriate additional measures* to enhance the energy efficiency ...*are taken...*”
- Strengthen item 4 to ensure the whole of the existing property is retrofitted and meets carbon neutral criteria in all but exceptional circumstances
- Recommend the use of permeable paving where there may be a loss of permeable area due to extensions and paving over gardens
- Include a requirement to support dark skies objectives
- Include cycle storage, charging points, wildlife roosting, nesting, feeding, foraging and hibernation opportunities

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Amend criterion 2 to clarify that 'any extension must be subservient to the original property'
- Strengthen criterion 4 to take opportunities to enhance the sustainability of the existing dwelling including the use of permeable paving

Delivery Policy DHC5 Wellbeing and healthy communities

Support comments

- Policy likely to have a positive impact on health and wellbeing



- Fully support this policy. Independent research shows that spending time by the waterways can make people happier and improve life satisfaction
- Support and scope exists to demonstrate the links between and opportunities arising from this theme and multifunctional green and blue infrastructure through the work of the Gloucestershire Local Nature Partnership
- Welcome the increasingly clear thought given to wellbeing and the role that sport and physical activity can play in achieving this

Objection comments

- There should be 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
- It is unclear how criterion 1 of the policy could meaningfully be satisfied as there are no metrics against which proposals could be assessed
- Doubtful whether it is realistic to expect all developments of 10 or more dwellings to meet the requirement set out in criterion 1
- It may be more appropriate to request a Health Impact Assessment to be produced to support planning applications, based on a framework that could be set out in a supplementary planning document

Suggested wording changes

- Amend 1 to read: “1. will provide “access to healthy, fresh and locally produced food *including provision of allotments*”
- Amend 1 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
- Amend 2 to read “...provide layouts that support and enhance the mental and physical well being of residents to encourage healthy, safe and active lifestyles *via safe, off-road multi-user tracks for walking/cycling/riding/mobility scooters.*”
- Amend final clause to read: ““Proposals for the multi-use and co-location of health facilities with other services and facilities will be supported *and should be in line with NHS Estates strategy.*”
- Should be explicit reference to the importance of the natural environment to wellbeing and seek opportunities to access and interact with nature
- Suggest the inclusion of social/community hubs and facilitating multi-functional space.
- Make reference to the ambitions of the Gloucestershire ‘We Can Move’ strategy – e.g. “including those with disabilities and those least likely to be physically active”
- The policy should also address the provision of walking and cycling routes (including easy access routes for the disabled)



Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Changes to criterion 1 to deliver specific measures
- Changes to criterion 2 to set out active travel measures (walking, cycling, riding, mobility scooters)
- Update glossary and include explanation of approach in supporting text

Delivery Policy DHC6 Protection of existing open spaces and built and indoor sports facilities

Support comments

- Welcome the increasingly clear thought given to wellbeing and the role that sport and physical activity can play in achieving this
- PROWs need better protection as outdoor recreation facilities
- Open spaces may not be "lost" physically but often suffer lost value to the community by a change of ambience or accessibility
- The community should have a say in whether open space/sports facilities might be available for development. This should not be based on a developer's assessment
- Welcome the role of NDPs in designating Local Green Spaces but other mechanisms should also be available
- Green spaces should not be reduced due to development. Open spaces are an intrinsic part of the character and setting of our communities
- Any replacement facility should be re-provided with a net benefit to the community
- Protect open space from proposals that compromise their use, quality or ecological value
- Support for policy to prevent the loss of open space (e.g. at Stratford Park)

Objection comments

- Including built and indoor sports facilities dilutes and devalues measures to protect and enhance green spaces and natural areas

Suggested wording changes

- It would be stronger if opening clause was amended to "Development proposals shall not involve the whole or partial loss *or devaluation* of open space within settlements, or of outdoor *sports and* recreation facilities, playing fields or allotments within or relating to settlements, or of built and indoor sports facilities unless:"
- Should be stronger to improve and enhance green spaces especially green corridors



- Should additionally provide support to parishes and community groups that wish to take such spaces out of private ownership and secure them as an ongoing community benefit
- Encourage the use of best practice guidelines in order to shape spaces that encourage physical activity in particular for older adults and people with disabilities

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Strengthen to address proposals that may devalue or cause a loss of accessibility to existing open space or sports facilities
- Update and expand supporting text to reflect recent evidence gathering and policy approach
- Update glossary

Delivery Policy DHC7 Provision of new open space and built and indoor sports facilities

Support comments

- Support as the requirements are clearer than the previous policies and are informed by the latest open space and GI study
- Positive impact on physical activity and food and natural environment/GI, in particular
- Good to see the linkages between recreation and the wider benefits of green infrastructure
- Open spaces can also provide multiple additional benefits to a site's drainage strategy
- New open spaces should include access corridors and accommodate the widest range of user types, ages and abilities
- There must be a plan and funding to manage the green space after the developer has left.
- Extend the policy to include cemeteries as there is a significant deficit in the District
- The criteria set out are worthwhile but need to consider the viability of the development
- It is helpful that the Draft Plan sets out standards which can then be used in the masterplanning of residential development proposals
- The presumption should be that on-site provision is always realistic and appropriate, and it should be up to the developer to prove otherwise

Objection comments

- There is an error in the total, which should be 3.92ha/1,000 population, not 3.22 ha/1,000
- Having such a large number of separate typologies is not only confusing but it is also unnecessary and there is some overlapping e.g. 'Amenity Green Space', 'Parks and Recreation Grounds' and 'Natural Green Space'



- The provision of indoor sports facilities should more appropriately be covered by CIL rather than by on-site provision or specific S106 contributions
- Facilities such as swimming pools and health & fitness studios are also typically provided by the private sector where market demand exists. It is not therefore necessary for the local authority to seek to provide these or to take contributions towards provision
- The need to provide contributions to build sports facilities unjustified in that no evidence has been provided to support any request
- The final paragraph of the Policy is in conflict with the statutory tests for contributions.
- The list of Open Spaces does not include PROWs, although they are vital to a vast number of people of all ages and abilities
- A more proactive approach and specific strategy for providing additional leisure/recreational facilities should be set out

Suggested wording changes

- Widen cases where financial contributions in lieu of on-site provision may be appropriate to cover non-strategic sites
- The final paragraph of the Policy should be changed to make it clear that provision will only be sought where development will create a deficit within the local area
- Encourage the inclusion of a comment which states that provision and design of new open space should be designed in conjunction with the site drainage strategy
- The specified 'quantity standard' for Natural Greenspace (ANGSt) relates specifically to the provision of (and access to) local nature reserves, not 'natural greenspace' in general
- The policy should include other relevant ANGSt accessibility standards
- Refer to best practice guidelines in order to shape spaces that encourage physical activity and access to green space in particular for older adults and people with disabilities
- Definitions of natural green space, and amenity space should be provided

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Amend total open space provision to correct previous error
- Clarify when on-site provision or off-site contributions will be required, and refer to financial contributions through a legal agreement or Community Infrastructure Levy
- Include references in supporting text to providing Supplementary Planning Document to provide more information on the protection of open space and sports facilities
- Update glossary and include explanation of approach in supporting text



Section 5.0 Employment and infrastructure policies

CP11: New employment development

Support comments

- The expansion and safeguarding of businesses and employment sites is supported
- Ensuring development is consistent with cutting carbon dioxide emissions and adapting to climate change is welcomed
- The mention of SuDs is welcomed

Objection comments

- The wording is too restrictive and does not allow for alternative uses within a site, contrary to NPPF

Suggested wording changes

- Remove or better define “industrial symbiosis”
- Make reference to a transformation to a carbon neutral and circular economy
- Add encouragement to green industries

Council’s response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Updating the supporting text to acknowledge the 2021 Employment Land Review and Gloucestershire Economic Needs Assessment
- Inclusion of a definition of “Industrial Symbiosis” in the supporting text

CP12: Town centres and retailing

Support comments

- The policy will bring some positive impacts for macro-economic factors and employment.
- Suggest review of the extent of Primary Shopping Areas
- Question specific reference to car showrooms (E2)?
- Should include reference to the requirement for impact assessment for all retail development above specified thresholds



Objection comments

- It is not accepted that Wotton is shown as the lowest priority. All town centres are of equal importance
- Concerned that given a retail hierarchy, Stroud will always benefit at the expense of other town centres
- New development at Sharpness will be the size of Dursley and should be included as such in the tables
- Concerned about the cumulative impact of planned new local centres

Suggested wording changes

- Amend text of Part C to read “*day to day* needs of the *local* residents”
- Amend text of Part C to read “Such centres should be of a scale appropriate to the site. *It must be demonstrated that they do not individually or cumulatively* undermine the role or function of other centres within the retail hierarchy *or have an unacceptable impact on them*, and should not become destinations in their own right

Council’s response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- List all planned Local Centres
- Classify Neighbourhood Shopping as Lower-order Local Centres
- Expand policy remit to include retail and leisure uses in town centres
- Amend sequential test to refer to primary shopping areas and out-of-centre accessible locations with good connections to town centres

Core Policy CP13: Demand management and sustainable travel measures

Support comments

- Better emphasis on sustainable travel is welcomed
- It will have a positive impact on active travel
- The policy addresses the needs of people with reduced mobility
- The policy is compatible with climate change mitigation aspirations

Objection comments

- Most people drive cars. The policy should not be so anti-car.
- Too vehicle orientated and should prioritise public transport and active travel



Suggested wording changes

- Include cycle parking
- Sustainable travel should include equine travel
- The policy should include electric car charging points

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. No changes are proposed in response to comments received from public consultation.

Delivery Policy EI1: Key employment sites

Support comments

- Provides a good range and distribution of sites across the district
- The expansion and safeguarding of existing sites is supported

Objection comments

- Stonehouse Eco Park will not come to fruition in the timeframe so further study and site identification needed

Suggested wording changes

- Should include further sites around Aston Down
- Renishaw site boundary needs to be updated
- The policy needs to incorporate protection for landscape and ecology

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Removal of EK20 Orchestra Works, Kingswood, to be moved to Delivery Policy Ei2
- Acknowledge the new E class use
- Updating the supporting text to acknowledge the 2021 Employment Land Review



Delivery Policy EI2: Regenerating existing employment sites

Support comments

- Regenerating existing brownfield employment sites is supported

Objection comments

- Daniels Industrial Estate should be removed as it has proved unviable

Suggested wording changes

- The list should include Ham Mills
- Wording relating to the provision of employment opportunities for the local community needs strengthening as it gives the developer too much room for wrangling.
- Brimscombe Port is not shown as a regenerated existing employment site

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Remove ER4 Dockyard works and ER5 Dudbridge Industrial Estate as they have active planning permissions
- Include ER10 Orchestra Works, Kingswood (moved from Delivery Policy EI1)
- Include ER3 Ham Mills as planning permission has lapsed

Delivery Policy EI2a: Former Berkeley Power Station

Support comments

- The continued proposed allocation of the Berkeley site is supported

Objection comments

- There were no specific objection comments raised

Suggested wording changes

- The de-licensed site is acceptable for alternative uses, including employment (B1 – B8) and related training and education
- For the licenced site, operations and uses associated with decommissioning, waste management and land remediation on the Nuclear Licensed Site in line with national strategies and policies and regulatory requirements



Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Changes to the supporting text to recognise the divergent nature of the de-licensed site and the licensed site/power station site

Delivery Policy EI4: Development at existing employment sites in the countryside

Support and Objection comments

- There were no specific support or objection comments raised

Suggested wording changes

- Development should be required to be net carbon neutral

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. No changes are proposed in response to comments received from public consultation.

Delivery Policy EI5: Farm and forestry enterprise diversification

Support and Objection comments

- There were no specific support or objection comments raised

Suggested wording changes

- The plans should be required to demonstrate that appropriate consideration has been given to the potential for sequestration, greenhouse gas emissions reduction and community-based initiatives
- The description of open countryside should be tested as there is a clear difference between true open countryside as against that which is already a location for businesses



Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Updating the supporting text to acknowledge the new E class use

Delivery Policy EI6: Protecting individual and village shops, public houses and other community uses

Support comments

- The policy is strongly supported for its potential positive impact on community cohesion and social infrastructure
- It will help maintain local access to services and community facilities

Objection comments

- There were no specific objection comments raised

Suggested wording changes

- The policy should include sports sites
- Amend text – remove the word 'all' from the last line in first paragraph to read "...will be supported where the criteria below are satisfied". Add the word 'or' to the end of criteria 1 and 2. Add the words "unless in the loss of facilities arises from an NHS service modernisation strategy following a rationalisation programme" at the end of criteria 3
- The text emphasises that development will be supported if conditions are met rather than emphasising that such buildings are key to community infrastructure and sustainable communities and should be maintained as far as possible

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. No changes are proposed in response to comments received from public consultation.

Delivery Policy EI7: Non-retail uses in primary frontages

Support comments

- Suggest a review of the extent of primary frontages
- Query scope for restricting the proliferation of take-away outlets



Objection comments

- The policy is unduly restrictive to Class A uses and ignores other appropriate primary frontage uses such as healthcare

Suggested wording changes

- There were no specific wording changes raised

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Replace with Primary Shopping Area policy
- Amend to reflect Use Classes Order changes and preferred Class E uses
- Include policy criteria for consideration of uses outside Use Class E within Primary Shopping Areas

Delivery Policy EI8: Non-retail uses in secondary frontages

Support comments

- Suggest a review of the extent of secondary frontages
- Query scope for restricting the proliferation of take-away outlets

Objection comments

- There were no specific wording changes raised

Suggested wording changes

- Clarification required to when frontages were last reviewed and whether they are still appropriate

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Replace with Town Centres policy
- Amend to reflect Use Classes Order changes and preferred town centre uses



Delivery Policy EI9: Floorspace thresholds for Retail Impact assessments

Support and objection comments

- There were no specific support comments raised

Objection comments

- Threshold should be reduced to 750sqm
- The policy could be more flexible with a figure of 1000sqm

Suggested wording changes

- There were no specific wording changes raised

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Expand to refer to retail and leisure Impact Assessment in accordance with the NPPF
- Include types of leisure development requiring Impact Assessment
- List all planned Local Centres
- Classify Neighbourhood Shopping as Lower-order Local Centres
- Reflect NPPF requirements for Impact Assessment

Delivery Policy EI10: Provision of new tourism opportunities

Support comments

- Tourism and especially eco-tourism are important
- Increasing tourism brings financial benefits for local and district wide stakeholders
- Support the need for sustainable tourism
- Stroud should aim for a reputation for low carbon tourism

Objection comments

- There were no specific objection comments raised

Suggested wording changes

- Amend paragraph 3 to read “the scale, design and use of the proposal is compatible with its wider landscape setting and would not detract from, *but will enhance and improve the* acknowledged biodiversity interest, character or appearance of the landscape or settlement



and would not be detrimental to the amenities of residential areas *nor interfere with the neighbouring residents' quiet enjoyment of their property*"

- Amend paragraph 4 to read "the site provides adequate access and infrastructure and opportunities, wherever possible, to make a location more sustainable - for example by enhancing local facilities or by improving access to local facilities by foot, *horse*, cycling or by public transport

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. No changes are proposed in response to comments received from public consultation.

Delivery Policy EI11: Providing sport, leisure, recreation and cultural facilities

Support comments

- It will have a positive impact on health and well being

Objection comments

- There were no specific objection comments raised

Suggested wording changes

- Include walking, cycling and riding as leisure and recreation
- Amend criteria 3 – "the development can *and will* be made readily accessible to adequate bus, cycling and walking links, for the benefit of non-car users"
- Amend criteria 6 – "any biodiversity interest is enhanced *or restored* by taking opportunities *including the creation* of a network of multi-functional green spaces, which support the locality's natural and ecological processes
- Suggest including an 8th bullet point to read "the proposals for sport facilities should be identified in the Playing Pitch Strategy's Action Plan and/or the Built Facility Strategy Action Plan". NB this is reviewed and update every year

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. No changes are proposed in response to comments received from public consultation.



Delivery Policy EI12: Promoting transport choice and accessibility

Support comments

- The policy rightly focuses on promoting modal transport shifts and the need to avoid encouraging private car use.
- Support cycling routes being included in the Stroud District Plan
- The area will benefit enormously from more provision for buses, trains, cycle tracks, secure cycle racks and better pedestrian pathways
- Support this policy and the objective that developments should be planned in line with the Sustainable Transport Hierarchy

Objection comments

- There were no specific objection comments raised

Suggested wording changes

- Amend first paragraph to read “... Masterplans should be designed to prioritise active travel modes, including emerging mobility options such as e-bikes and e-scooters, *as well as protecting existing sustainable travel through walking, cycling and horse riding*. Residential streets should be designed to a 20mph speed limit to enhance pedestrian, cycle *and horse rider* safety. *Community Connectivity may also benefit from new off-road routes and lower speed limits on rural routes as development increases*”
- Amend paragraph 3 to read “Where appropriate, new developments will be required to connect into the surrounding infrastructure and contribute towards new or improved walking, cycling, *equestrian* and rail facilities
- Amend paragraph 3 to read “Developers must take account of the proposals included within Stroud Infrastructure Delivery Plan, the Stroud Sustainability Transport Strategy Gloucestershire Local, Transport Plan *and where relevant, made Neighbourhood Development Plans*”
- There should be more emphasis on EV charging points

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. No changes are proposed in response to comments received from public consultation.

Delivery Policy DEI1: District-wide mode-specific strategies

Support comments

- Strong support for improved cycling and walking infrastructure
- Strong support for implementation of a Wotton, Kingswood, Charfield greenway, and the route from Dursley, Cam, Cam station and beyond
- The impact of delivery vehicles needs to be considered
- There should be a well-defined district-wide walking and cycling network linking all settlements, major employers and schools
- The policy should address commuting to Bristol which has high numbers but is poorly served by public transport
- More overall detail is needed

Specific projects

- There should be a connection from Minchinhampton to national cycling route 45
- Consideration should be given to a train station or halt in the Frome Valley
- A cycle way from Horsemarling roundabout (Stonehouse/Standish) through to M5 junction 12 roundabout should be included
- There should be safer pedestrian/cycle link over the A38 for access to Cam Station

Objection comments

- There were no specific objection comments raised

Suggested wording changes

- More emphasis is needed on improvements for vulnerable road users such as horse riders and cyclists
- More reference should be made to improving rail transport access
- The A38 should be identified as a key public transport corridor

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. No changes are proposed in response to comments received from public consultation.

Delivery Policy EI14: Provision and protection of rail stations and halts

Support comments

- Overall strong support for the re-opening of Bristol Road station, Stonehouse



- Land at Hunts Grove should be safeguarded for the provision of a train station
- Consideration should be given to a train station or halt in the Frome Valley
- Access to the main line at Berkeley Road
- More ambition would be welcome

Objection comments

- There were no specific objection comments raised.

Suggested wording changes

- Clarification is needed on whether 1 or 2 new stations on the Bristol/Birmingham line are proposed

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. Further rail assessment and feasibility work has justified more positive support for reopening the Sharpness branchline to passenger services and a new station at Bristol Road, Stonehouse. The policy continues to safeguard land at Hunts Grove.

El15: Protection of freight facilities at Sharpness Docks

Support comments

- The impact of increased lorry journeys on the amenity routes (Public Right of Way) crossing the roads needs to be considered

Objection comments

- There were no specific objection comments raised

Suggested wording changes

- There were no specific wording changes raised

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. No changes are proposed in response to comments received from public consultation.

El16: Provision of public transport facilities

Support comments

- Strong support for more public transport facilities
- Additional requirements for shelters and seating need to be considered
- Requirements for developer contributions to maintenance would encourage more robust shelters and seating
- Encouragement for low carbon buses and taxis, including electric and hydrogen charging facilities
- Autonomous vehicles could change the way we travel within the plans timescale

Objection comments

- There were no specific objection comments raised

Suggested wording changes

- There were no specific wording changes raised

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. No changes are proposed in response to comments received from public consultation.

Section 6.0 Our environment and surroundings Policies

CP14: High quality sustainable development

Support comments

Principle

- Welcome new elements of the revised policy CP14
- Support the extensive commitments to delivering environmentally sustainable development within the District

Carbon Neutral and Climate Change

- Carbon neutral should be an embedded part of high quality development
- Should also include consideration of the environmental impact of land contamination remediation
- Demand solar panels and water saving devices in new development

Landscape & Biodiversity

- The policy should require net-gains in biodiversity and specify the amount of net-gain that needs to be provided
- Support for a stronger worded policy and specific hydro morphological improvement advice, together with technical solutions such as SuDS, to help waterbodies achieve good ecological status
- Highlight the importance of providing green infrastructure, including nature-friendly features as part of new development and the 'Building with Nature' standards
- Consider light pollution, Dark Skies and implementation guidance as a separate policy aspect with benefits for AONB, countryside and biodiversity interests.

Design

- Welcome reference to adequate provision of water supply, foul drainage and sewer capacity.
- Support for taller buildings and vertical development in appropriate locations as space efficient and an effective means of reducing the carbon footprints of residents
- Require GI thinking to be embedded early in site layout considerations
- Should include neighbourhood accessible open space for health and wellbeing
- Unclear what is meant by: 12 It is not prejudicial to the development of a larger area in a comprehensive manner



Objection comments

- Developers are money driven providing low quality houses and leasehold common areas with estate charges
- There is never enough parking per property meaning estates resemble rabbit warrens. This is not high quality design
- CP14 Criterion 12 provides potential opt out for developers

Suggested wording changes

- Add rainwater harvesting and reuse of grey water to criteria
- Include compliance with the 'Building with Nature' standards
- Strengthen policy wording to 'will be required'
- Amend text of criteria 2 to 'the provision of *high quality innovative* SuDS'
- Criteria 4 is inconsistent the first half of the sentence is 'No increased risk of flooding' and then this is weakened in the 2nd half by 'reduce the causes and impact of flooding as a consequence of the development'
- Criteria 8 should specifically reference 'ecological networks' to align with national policy and legislation
- Criteria 8 - amend to 'retention, *conservation* and enhancement', to better reflect the purpose of AONB designation
- Criteria 8 and 9 must include existing and improved multi-user PROW networks.
- Add to criteria 9 - "...and amenity space *such as allotments, community orchards, community composting schemes* provision..."
- The final sentence of the policy is not sufficiently clear as to when such documents should be provided in support of proposals. It could be deleted without undermining the purpose or effectiveness of the policy
- The use of the restrictive phrase 'built heritage', except where the context is building specific, or 'built and natural heritage' (for example in the title above ES6 on page 185 or the vision for the Severn Vale), seemingly excludes historic landscapes and archaeology. More inclusive phrases such as 'natural and historic environment' would be far preferable throughout the plan

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Update glossary and include explanation of approach in supporting text including using terminology "net" carbon neutral, "natural and historic environment" phrase for consistency
- Consider Dark Skies as part of CP14 or as a stand-alone policy with accompanying implementation guidance



- Refer to grey water and rain water harvesting and other SuDS initiatives in policy and supporting text
- Consider language used to give greater weight and consistency to the policy criteria
- Consider further soil quality matters
- Consider inclusion of hydro morphological improvements e.g. removal and modification of barriers to habitat connectivity and fish movement such as weirs culverts etc
- Consider reference to the 'Building with Nature' standards (as SDC are a signatory to LNP GI Initiative)
- Consider inclusion of existing and improved multi-user PROW networks in policy criteria

Core Policy CP15: A quality living and working countryside

Support comments

Principle

- Support enhanced Policy CP15 to provide some flexibility for permitting development if there is a proven identified need in rural locations
- It must be clear in the policy and its supporting text that each principle listed stands alone and that the principles do not stand in a hierarchy
- Welcome measures to promote accessibility, grow own food, and provide land based green jobs
- Welcome flexibility for rural-based business and organisations to successfully operate
- Principles should be extended to enable development of brownfield sites well related to settlements/ existing communities, with or without a settlement boundary, to maintain the vitality of rural communities

Exceptional development

- Welcome criterion (ii) it does not have an adverse impact on natural assets and/or landscape character
- Barns that are no longer needed, put up within the last 30 years but never used as part of an agricultural business, should not be able to be automatically converted
- New farm buildings: need a test to show that new buildings are not within 800m of 'redundant' buildings converted within a specified period
- More explanation of affordability and replacement dwellings criteria is needed
- Clarify replacement dwelling criteria

Objection comments

- The policy is considered to be too restrictive
- The policy fails to support the development of existing business interests in rural locations
- The criteria should be revisited to reflect the actuality of rural business applications



Suggested wording changes

- 3. Rural exception site - Explain changes to what may be allowed as "affordable" in the supporting text and define rural exception site in terms of prioritising affordable social in perpetuity (as HC4)
- Add the NPPF definition of rural exception site in Annex 2 to SDLP Glossary definition.
- Add a new Principle 10. *Maintains the use and occupation of the land enabling the continuity of a local family within the community*
- Criterion ii) should include consideration of the impact on the public rights of way (PROW) network
- In order to provide consistency between policies CP15 and DES1 and to be consistent with National Planning Policy, criterion 'v' should also be amended to state: *"in the case of proposals to re-use redundant or disused rural buildings, these should be accommodate the new use. Any such conversion should maintain the character of the original building and provide an enhancement to its immediate setting."*

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Amend criterion 9 to include Tier 3b settlements
- Include in criterion (ii) a reference to public rights of way (PROW)
- Make amendments to criterion (v) to reflect the NPPF and address issues relating to local character

Delivery Policy ES1: – Sustainable construction and design

Support comments

Principle

- Support policy requirement for development to achieve net-zero carbon
- Support setting energy requirements for new development, energy efficient new development and renewable energy requirements

Carbon Reduction and Climate Change

- Water efficiency measures should be added
- Support measures to promote the maximum reduction in carbon generation and embedded energy in new development prior to the offset of residual emissions through payments to a carbon offset fund
- Support reference to electric vehicle charging provision



- Question how the lifetime impacts of proposed new development e.g. traffic are to be calculated and factored in to net-zero carbon calculations?
- Require that all new building, including industrial and agricultural, should incorporate solar panels in roofing
- Include Dark Skies guidelines on lighting
- Include provision for community composting sites in new development
- Include a requirement to meet Building with Nature standards
- Clarify when the policy is applicable to construction phase and when to finished build

Viability

- The clause 'viable for the developer' needs more explanation
- Imperative that the policy requirements, including satisfying all the proposed HQM standards, are considered as part of a viability assessment of the whole Local Plan to determine the impacts to a development and to ensure it would not affect the deliverability of sites coming forward
- Viability testing of enhanced building requirements and locally specific standards should be tested at the plan making stage alongside infrastructure requirements and affordable housing
- Suggest standards should be flexible to take account of sites with specific constraints where it is not possible or appropriate to achieve all of the standards
- A 'whole plan' viability assessment would assess whether there is scope to set higher standards

Objection comments

- The policy should align with national policy and Building Regulation requirements for a standardised approach to energy efficiency and to avoid undermining economies of scale for both product manufacturers, suppliers and developers
- The requirements are too onerous and prescriptive
- Energy efficiency in new builds and renovations should aim for passivhaus or energy efficiency (EPC) A which are values that can more easily be understood than the net-zero policy measures set out
- The financial implications of all policy requirements need to be tested through a robust up to date full plan Viability Assessment to ensure that the cumulative impacts of policy requirements do not render schemes undeliverable
- A viability assessment should consider not only the direct costs of this EVCP provision, but the full costs associated with any required upgrades to the electricity network in that area

Suggested wording changes

- Expand 4 to *'Development proposals should demonstrate that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day. Developments should*



demonstrate that they are water efficient, where possible incorporating innovative water efficiency and water re-use measures.'

- ES1 should include reference to SuDS design best practice and the SuDS hierarchy.
- Amend policy text to comply with Building Regulation Part L
- The requirement for EVCPs should be deleted
- Amend 8 to *"Enable electric vehicle charging- New development with off road parking should provide electric vehicle points (HQM or equivalent) in accordance with Local Plan Standards. An electric vehicle charging point/ socket will be provided at every new residential property which has a garage or dedicated residential car parking space within its curtilage"*
- Add criteria 10: *Major development applications, even building change, must include proposals for generation of renewable energy to contribute at least 50% of the building's energy use*
- Suggest strengthening supporting text with reference to health impacts

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Amend criterion 4 to refer to water efficiency and reuse measures
- Refer to the Government reviewing future regulation within this area in supporting text
- Refer to the production of detailed guidance, the need for developer statements and monitoring and review arrangements in the supporting text

Delivery Policy ES2: Renewable or low carbon energy generation

Support comments

Principle

- Support decentralised renewable and low carbon energy generation.
- Support the identification of suitable areas
- There should be a presumption in favour of granting permission to build low carbon renewable energy facilities
- Addressing climate change should be an overarching priority even within the AONB
- Support renewable energy proposals outside the AONB
- Potential for the policy to have a positive impact on the natural environment, biodiversity, air and water quality
- The policy could be strengthened to mitigate any risk to health - potentially by requiring a health impact assessment / HIA screening for this kind of development

Energy Generation and storage

- Support on-shore wind generation



- Wind turbines should not be placed within 800m of any residential building without the express permission of the owner/occupier
- Within the Cotswolds AONB and in the setting of the AONB, the scale and impact of proposals must be compatible with the purpose of AONB designation
- Would welcome more specific reference to renewable or low carbon energy generation opportunities within and on existing buildings as well as green field sites
- Need to clarify the meaning and identification of suitable areas for solar and wind development and the associated development thresholds
- Need to clarify what would constitute major renewable energy development in the Cotswolds AONB
- The approach to the consideration of renewable energy development proposals within the Cotswolds AONB should be consistent with the policy approach of ES7 prioritising conservation and enhancement of the landscape and only allowing major development where demonstrated to be in the national interest and in the absence of alternative sustainable development sites
- Energy storage capacity should be associated with each renewable energy project and by utilising the batteries of electric cars

Suitable areas for renewable energy development maps

- The supporting maps showing possible areas for solar energy and wind energy need to be at a larger scale for them to be interpreted or understood
- Further evidence may need to be commissioned regarding impacts and mitigation options in respect of birds and bats
- Further clarification is required regarding 'suitable sites' and the size categories of wind turbine dimensions Within the Cotswolds AONB

Objection comments

- The AONB should be given the highest protection which is referred to in the NPFF. Proposals for renewable energy production in these areas should be refused
- The provision of decentralised and low carbon energy schemes requires detailed viability testing as it will not be deliverable on all development schemes
- Concern expressed about the exact location of potential solar and wind turbine placements within identified 'suitable areas'
- The identification of suitable areas for renewable energy development includes the Severn Estuary SPA, SAC and Ramsar site, where there would be implications for the impact on birds.
- The policy requirement for renewable energy proposals within the Cotswolds AONB to *demonstrably outweigh any harm to the designated area* is a less stringent requirement than the requirement for the impact to be 'acceptable' for developments across the whole district, including areas outside the AONB
- The size thresholds for solar and wind development proposals exceed the maximum size recommended in the Cotswold Conservation Board's Renewable Energy Position Statement

- The most practical and successful renewable resource for generating renewable electricity at the current time is offshore wind power. SDC should be lobbying the Government to promote offshore wind, to address issue at a national level rather than providing local solutions
- The approach of using suitability maps that don't take account of landscape sensitivity or potential visual impacts as the basis for this decision making is wrong and indicates that large scale renewable energy development is appropriate in multiple locations in the AONB and its setting

Suggested wording changes

- Add *"All rooftops encouraged to have renewable generation from solar"*
- The policy wording should be amended to reflect:
 - (i) the additional policy constraints that apply in the AONB and its setting, including the presumption that planning permission should be refused for major development; and
 - (ii) the smaller scale of renewable energy provision that would be appropriate in the AONB and its setting
- For any wind and solar farm proposals in the AONB that are deemed by the local authority to be major development, consideration of such proposals should include:
 - (i) the need for the development;
 - (ii) the cost of, and scope for, developing outside the AONB, or meeting the need for it in some other way;
 - (iii) any detrimental effect on the environment, etc.

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Add references to ground-mounted solar being more likely to be supported within areas of lower landscape sensitivity
- Add supporting text to explain the approach taken to identifying suitable areas for solar and wind
- Add supporting text explaining how the policy relates to assessments of landscape sensitivity

Delivery Policy DES3: Heat supply

Support comments

Principle

- Support encouragement for communal low-temperature heating systems, where viable
- Highlight future potential of utilising sewer heat to provide a heat source for communal heating systems



- Heat networks need proper regulation to protect their consumers
- Should only apply to very large schemes of 500 or more units
- Potential positive health impact
- Support designing new development to allow connection to a local heat network in the future

Water based heating and cooling systems

- Developments proposing non-standard heat supply can have impacts upon the water environment. Any such developments brought forward should protect the water environment
- Developments close to the canal, including Local Plan allocations, should investigate whether canal water can be used for a district heating and cooling system

Objection comments

- Fossil-fuelled communal heat pumps are not supported
- Viability concerns regarding provision of infrastructure on development schemes to connect to 'planned' heat networks, including connections 'currently unviable'
- Heat networks are only one option to reduce carbon emissions and are not necessarily the most appropriate and achievable across the plan area
- Housing/Industry should be looking to a more flexible provision that allows use of current best available technologies
- Recommend greater flexibility to accommodate site constraints, the availability of connection to a local heat network, and viability

Suggested wording changes

- "Development proposals should include a communal low-temperature heating system where viable and feasible"

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Add supporting text to explain the technologies and how new development can act as a trigger for establishing a network



Delivery Policy ES3: Maintaining quality of life within our environmental limits

Principle

- Strong support
- Positive impact on health in relation to air and water quality, noise, odour, road hazards and community safety
- The policy should positively support developments that would help to address, or reduce, the identified adverse impacts

Additional criteria

- Strongly support the ecological flood storage approach
- Consider impact of development on the Public Rights of Way (PROW) network
- Recommend additional consideration of noise from marquees at anti-social hours

Objection comments

- The policy should protect fertile soils and best growing farmland of the District

Suggested wording changes

- Expand Criterion 5 to include impact on the PROW network as part of our highways, including safe linking between PROW routes
- The policy should explicitly address the issue of tranquillity by adding the following criterion:
Adverse impacts on tranquillity (particularly in relation to the relative tranquillity of the Cotswolds AONB)
- Traffic and tranquillity issues should also be addressed by adding the following criterion:
Traffic (including development that would increase traffic flows and / or HGV movements in the Cotswolds AONB by 10% or more)

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy and guidance. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Add public rights of way to criterion 5
- Add criterion 8 on best and most versatile soils and add this reference to the supporting text

Delivery Policy ES4: Water resources, quality and flood risk

Support comments

Principle

- Support effective green and blue infrastructure measures at a range of scales from catchment level to individual sites
- Will provide positive health benefits in terms of risk of flooding, water quality and climate
- Should have regard to the water framework directive requirements

Natural Flood Risk Management and SuDS

- Welcome reference to the provision of upstream rural SuDS projects
- Support the retrofitting of SuDS at all scales of development
- SuDS should be promoted as the most effective way of managing surface water flows whilst being adaptable to the impacts of climate change, and providing wider benefits around water quality, biodiversity and amenity
- Support promotion of water resource efficiency measures in new development, including the optional higher water efficiency target of 110 Litres per person per day within part G of building regulations where possible, through the use of water efficient fittings and appliances within new properties
- The dual function of SuDS including waterside, flood storage areas, or areas along known flow routes, as Green Infrastructure, should not compromise natural habitats
- Support in association with farm and woodland soil management
- Include measures to bring waterbodies to good ecological status including addressing the legacy of post-industrial infrastructure and water management
- Rural SuDS project should include 'Natural Flood Management' as it is a much more widely recognised term

Flood Risk and Climate Change

- A site drainage masterplan is important in ensuring that multiple developers across different development sites work together towards an approved overall drainage strategy
- Concerned that current flood risk assessments take account of what appears to be a near exponential rise in the rate of sea level rise and the frequency and intensity of rainfall
- Long term flood risk, at least to the end of this century, should be considered in the light of possible climate change scenarios
- Within the introductory text additional reference needs to be made with regards contributions to all types of flooding and the provision of mitigation measures by third parties such as flood warning or existing defences, in line with financial requirements that are being asked for other infrastructure and the canal regeneration
- Highlight the potential of the Stroudwater Canal as a balancing pond to alleviate potential flooding of the River Frome close to M5 Junction 13



Objection comments

- Object to building on any flood plain
- Viability concerns regarding the requirement for upstream rural SuDS projects outside of the development site boundary
- Insufficient attention is paid to the cross-policy benefits of SuDS in development areas
- Insufficient detail on the roles played by various partners and groups with a stake in water resource and flood risk management from LLFA to local flood action groups
- Insufficient attention is paid to surface and groundwater flood risk

Suggested wording changes

- Suggest amendment that all new developments shall incorporate appropriate Sustainable Drainage Measures (SuDs) *as a minimum*, in accordance with National Standards for Sustainable Drainage Systems
- Recommend reference to contribution to upstream rural SuDS projects be omitted from Policy ES4
- Requirements 1 -6 are not strong enough and need modification/deletion with suggested substitution: *New development in areas with known ground and surface water flooding issues will not be permitted due to risk on this site and additional exacerbated risk further down the catchment*
- Suggest amendment: 2. Open up any culverted watercourse where safe and practicable to create an asset of community *and ecological* value
- Recommend the inclusion of the following wording: *‘The development of an overall master plan for the development will enable strategic infrastructure to serve multiple development parcels to be designed appropriately looking to provide wider benefits and efficiencies in design that would not otherwise be possible. The masterplan should also outline key milestones that need to be achieved for critical infrastructure prior to the commencement of some phases. This will help to align programmes between multiple stakeholders.’*
- Beneficial to incorporate the following text from section 6.1 of the Level 2 SFRA between paragraphs 3 and 4. *“Flood risk should be considered at an early stage in deciding the layout and design of a site to provide an opportunity to reduce flood risk within the development”*
- Suggested amendment to 4th paragraph; *“For all developments in areas with known surface water flooding issues, appropriate mitigation and construction methods will be required including, where appropriate, contributions towards maintenance of existing defences that benefit the site, development or maintenance of existing flood warning services, development of future flood alleviation projects and/or provision of upstream rural SuDS projects”*
- The following paragraph, from section 6.1 of the Level 2 SFRA, could be incorporated at the end of the delivery policy introduction notes linking Policy ES4 to ES6: *“Waterside areas, or areas along known flow routes, can act as Green Infrastructure, being used for recreation, amenity and environmental purposes, allowing the preservation of flow routes and flood*



storage, and at the same time providing valuable social and environmental benefits contributing to other sustainability objectives”

Council’s response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy and guidance. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Policy and supporting text to refer to flood risk being considered at an early stage in the planning process
- Greater clarity on matters related to surface water flooding issues
- Add ecological value to Criterion 2 and new criterion 7 on measures to secure good ecological status to reflect Water Framework Directive
- Supporting text to reflect the need to consider hydro morphological and ecological improvements
- Supporting text to reflect multifunctionality of river corridors and link with Green Infrastructure
- Natural Flood Management reference placed in supporting text alongside SuDS references.
- Supporting text to refer to cumulative impacts of developments in a locality and the need to consider a site drainage masterplan or strategy

Delivery Policy ES5: Air quality

- Support measures to identify and mitigate air quality issues
- Managing and expanding the capacity of the natural environment is an essential part of the revised Delivery Policy ES5 to mitigate poor air quality
- Air quality guidance needs to keep pace with scientific evidence
- Should address air quality and noise pollution from M5 motorway and where possible seek to minimise and mitigate adverse noise effects alongside air quality
- Suggest mitigation measures could be strengthened to include infrastructure that supports more active travel means or low/zero carbon transport options and planting / Green Infrastructure solutions
- Should include specific consideration of traffic pollution through the centres of towns and villages, particularly the centre of Stroud, and potential traffic mitigation measures
- Support wider policy remit looking at air quality impacts from development not restricted to traffic pollution

Objection comments

- Does not include or take account of air pollution (CO₂, ammonia, methane, NO_x, particulates) from farming, particularly from livestock sheds. Combinations of these gases with traffic pollution cause serious harm to health and environmental harm
- Unnecessary bureaucracy in Stroud District
- Impact of Javelin Park Energy from Waste facility on air quality



Suggested wording changes

- Could include reference to the ambitions of the Gloucestershire Air Quality & Health Strategy

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy and guidance. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Supporting text to clarify air quality matters and reflect the range of sources of air pollution and associated health impacts
- Supporting text to specifically refer to Gloucestershire Air Quality & Health Strategy.

Delivery Policy DES1: Conversion of redundant agricultural or forestry buildings

Support comments

- Support conversion to uses other than open market housing
- Should only apply to buildings with a long period of demonstrable disuse
- Include an additional criterion for acceptable development where: *"Wildlife and biodiversity is not harmed but protected, encouraged and enhanced by the conversion"*

Objection comments

- Policy DES1 is not consistent with National Planning Policy or Policy CP15 relating to the re-use of existing buildings as a sustainable form of development
- The Policy should more positively promote the re-use of *all* suitable rural buildings, not restricted to redundant agricultural or forestry buildings, as a sustainable way to deliver new development
- Should not be so restrictive for open market housing - if this will economically reuse the building

Suggested wording changes

- Delete hierarchy of viable uses
- It is recommended that Policy DES1 should be re-written as follows:
The conversion of redundant or disused buildings outside of defined settlement development limits to an alternative use will be permitted where:
 1. *The original building is structurally sound and capable of conversion without substantial reconstruction or significant new extensions to accommodate the new use*
 2. *The provision of new openings, adaptation and modest extensions to the building to accommodate the new use will be acceptable, provided that this does not alter the overall character of the building;*



3. *The conversion of the building should provide an enhancement to its immediate setting; and*
4. *The existing vehicular access is suitable in landscape terms for the use proposed;*

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy and guidance. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Policy title and text amended to reflect NPPF rural building terminology
- Criterion 6 amended to reflect national guidance regarding their setting
- Supporting text updated to reflect changing farm practices and rural economy
- Supporting text changes to address concern on potentially circumventing planning policy controls in the countryside
- Supporting text to make reference to potential of ecological matters

Delivery Policy ES6: Providing for biodiversity and geodiversity

Support comments

Principle

- Support a policy well aligned with the ambitions of the NPPF and the 25 Year Environment Plan
- Support the protection afforded to international, national and local designations and to habitats and species of principle importance
- Support as a response to the continued decline in biodiversity nationally and beyond.
- Support clear policy presentation of the mitigation and sites hierarchies
- Will have a positive impact on health and wellbeing through natural environment / GI, biodiversity, climate, air and water quality impacts
- The policy should be applied pragmatically to achieve improvements to natural resources and biodiversity improvements, and should not act as a hindrance to applicants within the determination of planning applications
- Supporting text should be added to provide some context including the vision and work programme of the Local Nature Partnership, in particular on Nature Recovery Networks
- The policy should be re-ordered to 'front-load' the mitigation hierarchy and the hierarchy of nature conservation designations ahead of 'net gain' – this is because net gain potentially allows for some loss of biodiversity, at least in the short term, whereas there will be circumstances where any loss of biodiversity would not be acceptable (for example, development affecting international nature conservation designations)
- Will require cross boundary consideration working with neighbouring Local Authorities

Biodiversity net gain



- Strongly support the commitment to developments providing biodiversity net gain through the enhancement and creation of ecological networks
- 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
- The policy should also specify a minimum threshold for the amount of biodiversity net gain required (e.g. 10%); explicitly refer to – and provide an appropriate level of protection for irreplaceable habitats, including ancient woodland
- The creation of community compost sites and not mowing grass verges, other than for highway safety reasons, will encourage biodiversity through the creation of wildlife friendly sites and practices

Objection comments

- The policy should allow greater flexibility where the realisation of other planning objectives need to take priority
- Biodiversity net gain should take into account that many of the measures provided as part of the development will need to mature beyond the build period and should allow off site provision as an option
- More inclusive phrases such as ‘natural and historic environment’ would be far preferable throughout the plan
- Need to consider the direct and indirect impacts of developing individual sites, including from an increase in recreational use, as well as the cumulative impacts of development, on designated sites.

Suggested wording changes

- Suggest Amendment. Add criteria “v. Enhance” to the list

Council’s response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy and guidance. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- As the international site mitigation strategies are now well embedded in Development Management processes the supporting text has been edited down and updated to incorporate the Cotswolds Beechwoods SPA cross boundary work
- Policy specifies a minimum 10% threshold for the amount of biodiversity net gain required
- Supporting text amended to provide a context for the need for action on biodiversity matters
- Supporting text provides an insight as to how Biodiversity Net Gain is calculated using a nationally agreed metric system and how net gain can be delivered
- Supporting text explains Local Nature Recovery Strategy and Nature Recovery Networks being developed in collaboration with Gloucestershire Local Nature Partnership



Delivery Policy ES7: Landscape character

Support comments

Cotswolds Area of Outstanding Natural Beauty

- The conservation and enhancement of the Cotswolds AONB is a statutory duty in the national interest and should be regarded as a top priority for the Local Plan
- Recommend a comprehensive stand-alone policy specifically for the Cotswolds AONB, in addition to a landscape character policy that applies across the whole district
- No reference is made to the potential proposal to designate the Cotswolds as a National Park
- The policy should apply to all development and its impacts, including renewable energy installation not restricted to "major development" proposals
- Should be compatible with the policies DCP1 Delivering Carbon Neutral by 2030 and ES2 Renewable or low carbon energy generation
- Would welcome extension of the AONB around Nailsworth to provide added protection for remaining green spaces

Landscape Impact

- Support for the protection, retention and appropriate management of natural features including trees, hedgerows and water features that contribute to the landscape character and setting of development
- Should include reference to public rights of way (PROWs) as special features and the need to "conserve or enhance" the ambience of PROWs as countryside corridors
- Will have some positive health impacts
- Policies for the protection of the Cotswolds AONB (ES7) and countryside (CP15) should take precedence over policies CP3 Settlement hierarchy, HC3 self-build and custom build housing, HC4 Local housing need (exception sites) and DHC3 Live-work development
- Should refer to Neighbourhood Plan landscape evidence
- The value attached to the local landscape by local people should be taken into consideration on a site by site basis
- Should include specific protection for small existing green space within settlements, which may include gardens and small plots, essential to the character of a town, which should not be lost to development
- Should take into account changes to farm payment systems and climate changes as factors likely to drive changes in landscape character over the duration of the plan

Objection comments

- The protection of the Cotswolds AONB and Common land is vital. This protection does not come across in your draft Plan



- There should be a separate Cotswolds AONB policy which refers to the provisions of the Cotswolds AONB management plan
- Policy allowance should be made for progressive enhancement of landscapes which are in accordance with carbon reduction goals e.g. re-wilding, woodland planting and not require landscape characters to be frozen in time
- Include reference to Building with Nature standards

Suggested wording changes

- The wording of the policy should be changed “The Stroud District Landscape Assessment *and other landscape evidence* will be used when determining applications for development within rural areas

Council’s response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy and guidance. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Policy text amended to strengthen Cotswolds AONB Management Plan matters and to better reflect the Management Plan policies and accompanying guidance and advice
- Policy text applicable to all locations more closely reflects the economic, environmental, and social wellbeing benefits of the landscape and the importance of the diversity and sensitivity of landscape character areas in the District
- Supporting text is updated and clearer on landscape character definition and use
- Supporting text now provides a context to the Cotswolds AONB, its special qualities and relevance to the Local Plan landscape character impact considerations

Delivery Policy ES8: Trees, hedgerows and woodlands

Support comments

Principle

- Welcome aspiration for development to enhance and expand the District’s tree, hedgerow and woodland resource
- Support reference to ecological interests including green infrastructure networks
- Should include reference to biodiversity net gain and appropriate species in the right place
- Provides support for biodiversity conservation
- Should include drystone walls and key road verges
- Will have some positive health impacts

Trees, Hedgerows and woodlands



- Strengthen the policy by reference to the status of veteran trees and ancient woodland as ‘irreplaceable habitats’
- The Plan should identify strategic tree-planting sites to ensure that when trees are planted they are valued by nearby communities and contribute to ecological corridors and nature recovery networks
- Include promotion of tree-planting along both new and existing streets, in squares and in gardens
- Should seek effective, long term woodland management, including for existing woodland in the vicinity of the development, not just new woodland created as part of the development
- Ensure that any tree planting in the Cotswolds AONB uses appropriate, native species and is done at a scale that is consistent with the landscape character of the area
- Discourage the planting of conifers and encourage their removal and replacement with native species that are in keeping with the landscape character
- Address ash die-back for example, through the planting of appropriate tree species in appropriate locations specifically to address this
- The policy should specifically state no net loss of hedgerows, due to the importance of this feature as components of local ecological networks
- Hedgerow replacement should align with local ecological networks wherever possible
- There should be a policy precedent for hedgerow removal to take place outside of bird nesting season to avoid the need for exclusion netting
- Require a net-gain when development involves the loss of trees or hedgerows (e.g. 10%)

Objection comments

- Policies need to be written to promote tree-planting along both new and existing streets, in squares and in gardens

Suggested wording changes

- In the wording of the first paragraph, the words ‘*where appropriate*’ should be deleted so that it reads “Development should seek to enhance and expand the District’s tree, hedgerow and woodland resource.”

Council’s response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy and guidance. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Policy amended to reflect aims of the emerging LNP Tree Strategy and the benefits that trees, hedgerows and woodland can offer
- Policy explicit on no net loss of hedgerows as they form a key component of ecological networks and ecosystem services



- Supporting text to refer to using the Gloucestershire Local Nature Partnership (LNP) Tree Strategy to guide woodland conservation and creation
- Supporting text to refer to local ecological networks and ecosystem services
- Bird nesting and hedgerow removal matters are referred to in the supporting text

Delivery Policy ES9: Equestrian development

Support comments

- Provision for horse riders should match that for cyclists and walkers
- Rights of way should include more provision of bridleways and horse use and address recreational conflict with other users (particularly motorised leisure activities)
- Request consultation with local equestrian clubs and the British Horse Society

Objection comments

- Equestrianism has a significant carbon footprint and the change of use towards equestrian should be discouraged
- Loss of productive agricultural land to pony paddocks
- Impact on soil stability
- Impact and potential loss of scarce unimproved grassland habitats
- Development proposals for the location of stables should seek to reduce carbon emissions from the transport of horses and include facilities for low carbon vehicles on site

Suggested wording changes

- Amend policy wording to specifically refer to developments not having a significant negative impact on designated biodiversity sites or core components of the local ecological networks

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy and guidance. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Supporting text updated to reflect the need for further advice or a policy statement on equine development and activities including accessibility and location matters and management being appropriate to landscape character and biodiversity interests



Delivery Policy ES10: Valuing our historic environment and assets

Support comments

General Support Matters

- Support for the protection and enhancement of the historic environment with positive health impacts from benefits to the character and attractiveness of the area, the local economy, community identity and health and wellbeing
- The historic environment/ heritage assets should be considered throughout the Plan as a positive place shaping characteristic and an attribute that helps define local identity and inform change, not a constraint
- It should be understood that public rights of way (PROW) are a part of our historic environment and their ambience is part of the value

Carbon Neutral

- Need to address impacts of proposed 2030 ban on the use of fossil fuels Listed Buildings to ensure Heritage Listed dwellings are kept in good condition, occupied with at least minimum comfort and affordability levels and do not become empty “ancient monuments”
- Should have regard to Historic England best practice on applications for decarbonising Listed Buildings
- Should have regard to Commission for Dark Skies guidelines on lighting

Objection comments

- Policy ES10 should reflect national policy for the consideration of harm and the policy tests that apply in considering the impact of development on designated and non-designated heritage assets
- Recommend greater flexibility on the development of locally distinctive landmark features, such as mill chimneys, to take account of site specific circumstances and constraints

Suggested wording changes

- Suggest a Policy addition as follows:

Energy upgrades on Listed Buildings will be supported providing the following conditions are met:

-
- 1. *The energy efficiency measure is reversible when no longer necessary.*
- 2. *The change does not compromise the Listing Schedule.*
- 3. *The installation of double glazing will be encouraged but the frames must be made from sustainable materials and be of sympathetic design.*
- 4. *The installation of internal wall, ceiling and roof insulation will be encouraged as long as it does not harm the interior Listed features of the building.*



5. *Permission to install renewable generation measures would be encouraged as long it does not cause harm to the fabric or historic character of the building or cluster of buildings and their setting.*
6. *Where the Listed Building has a space, either on a roof or on the ground, that is not visible in the main building vista, installation of renewable measures will be encouraged.*

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy and guidance. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Policy criterion 5 updated to address issue of deliberate neglect or damage to heritage interests
- Supporting text updated to ensure conservation on heritage assets is in a manner appropriate to their significance
- Factual corrections on heritage and cultural asset numbers, production of a local heritage strategy in supporting text
- Supporting text provides more information on local heritage assets and using local listing criteria
- Supporting text to recognise the pursuit of carbon neutrality and energy efficiency in the historic environment

Delivery Policy ES11: Maintaining, restoring and regenerating the District's canals

Support comments

Principle

- Support specific policy that covers maintaining, restoring and regenerating the canals
- Maintaining, restoring and regenerating the District's canals will provide huge benefits to the area
- Every opportunity should be taken to ensure that the canals are treated as one and that the benefits or opportunities are perceived holistically
- Support restoration of the missing mile
- All developments adjacent to the canals must respect their character, setting, biodiversity and historic value as well as have regard to improving and enhancing views along and from the canals
- Provides support for biodiversity conservation
- Should emphasise the role of the canals in supporting the Council's vision to limit car use
- Suggest strengthening the supporting text with reference to health and physical activity benefits and links with the ambitions of the Gloucestershire Health and Wellbeing Strategy



- Highlight the potential of the Stroudwater Canal as a balancing pond to alleviate potential flooding of the River Frome close to M5 Junction 13

CIL and s106 Benefits

- Support CIL/s106 contributions towards the improvement or restoration of the related canal and towpaths
- Suggest that improvements to the towpath of the Gloucester and Sharpness Canal should be listed as potential projects for CIL /s106 funding to fulfil its potential as a tourist and commuting route

Objection comments

- CIL/s106 contributions should be used in much more impactful ways to benefit the wider community

Suggested wording changes

- Amend 3rd paragraph to read “...Environmental improvements to any canal's appearance will include enhancement of its historic and biodiversity value *and associated riverine and riparian habitats.*” The River Frome and its tributaries are closely linked to the canal and are very vulnerable to adverse impacts

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Delete “design” from references to guidance as the available guidance relates to a wider list of issues
- Refer to the relationship with the river network in terms of biodiversity and managing flood risk in the supporting text
- Identify opportunities for links to other walking and cycling routes in the supporting text
- Make reference to the forthcoming Canals Strategy in the supporting text

Delivery Policy ES12: Better design of places

Support comments

- Support policy which seeks to encourage good design
- Support potential for positive impact on physical activity / active travel, community cohesion and facilities; built and natural environment / Green Infrastructure; neighbourhood design; attractiveness of the area; and community safety, including road hazards



- Support delivery of high quality Green Infrastructure as part of major residential and employment development, citing the Building with Nature benchmark
- Recommend that development proposals in the Cotswolds AONB and its setting have regard to (and be consistent with) relevant AONB special qualities; the Cotswolds AONB Management Plan and other relevant guidance
- Should define what is meant by 'Better' design of places
- Should embed the ambition for carbon neutral development
- Should include provision for cycling linked with public transport hubs in order to secure modal shift
- Should include provision for sport and physical activity in particular targeted at priority groups e.g. young people
- Include reference to Commission for Dark Skies guidelines on lighting

Objection comments

- Neighbourhood Development Plans (NDPs) form part of the statutory Development Plan for Stroud District and are a material consideration in all decision making
- The references stipulated as part of thorough site appraisal should distinguish between adopted development plan documents, that have been subject to public consultation, and other guidance

Suggested wording changes

- Include specific reference to Building with Nature benchmark

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy and guidance. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Policy and supporting text updated to address issue of securing carbon neutrality
- Supporting text to encourage the use of Design Codes forming part of any Neighbourhood Development Plan

Delivery Policy DES2: Green Infrastructure

Support comments

Principle

- Support the new wider scope stand-alone policy for Green Infrastructure
- Support proposals for increasing the functionality of existing green infrastructure



- Support recognition of the need to link up existing and new green infrastructure
- Strongly support improvements to the quality of existing green infrastructure, including local networks and corridors, specifically to increase its attractiveness as a recreation opportunity and its value as a habitat for biodiversity
- Support as an opportunity to deliver Biodiversity Net Gain requirements
- Suggest a policy requirement for major new development to deliver high quality Green Infrastructure, citing the Building with Nature standards for Green Infrastructure
- Will have a positive impact on health from multiple benefits to health and wellbeing from maintaining and improving green infrastructure and could be referenced in the supporting text
- Support the Wotton, Charfield and Kingswood Greenway project
- Need to define Green Infrastructure

Policy areas

- Include provision for horse riders to match that for cyclists and walkers
- There should be something to benchmark and characterise the interaction of people with the various aspects of green infrastructure

Objection comments

- Should allow greater flexibility to take account of site specific circumstances and constraints.
- Will require improvements to the towpath of the Gloucester/ Sharpness Canal if it is to be used for tourist and commuting purposes
- Should include more detail on the development of walking and cycling infrastructure

Suggested wording changes

- Recommend strengthening the policy by deleting '*where possible*' and '*appropriate*'
- Make references to Gloucestershire Local Nature Partnership Nature Recovery Network
- Should explicitly reference protection of the Cotswold National Trail
- The text of this policy should be amended to include blue infrastructure

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Policy text strengthened in line with comments
- Supporting text provided to reflect sustainable development context
- Supporting text provided defines the term Green Infrastructure



Delivery Policy ES16: Public art contributions

Support comments

- Strong support for public art to help create a sense of place for new developments
- Will have a positive health impact from benefits to the character and attractiveness of the area, the local economy, community, cultural and spiritual identity, built environment and design

Objection comments

- The Council should provide evidence to justify the reasons that residential development without contributions to public art is unacceptable
- Planning conditions should only be imposed where they are necessary and relevant (para 55) whilst planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition (para 54)

Suggested wording changes

- The 2019 NPPF sets out three tests to be met when a planning obligation is sought (para 56). This policy requirement does not pass all three tests *and should be deleted*

Council's response

The Council considers the draft policy will help to deliver sustainable development and is in conformity with national policy. However, in response to public consultation, the results of Sustainability Appraisal and further evidence gathering, the following changes are proposed:

- Supporting text now provides a context for public art provision and the benefits it can provide
- Supporting text encourages the provision of new works of art as part of any development scheme

Suggested policy gaps

Suggested policies

- Reinstatement of the adopted Local Plan Policy CP1 presumption in favour of sustainable development
- Climate change adaptation policy
- Identify the delivery mechanism in the case of a housing shortfall
- Dark Skies policy
- Farming and land use policy
- Horse riding provision (as per walking and cycling policy)
- Control Air B&Bs; i.e. remove such sites from existing residential use and designate as commercial use
- Address “noise important areas” particularly existing housing close to motorways, to include a commitment to: upgrade noise acoustic barriers; implement a low noise surface to M5; full assessment of impacts prior to allocating land in proximity; and identifying appropriate measures to mitigate noise and air pollution

Suggested allocations and designations

- Allocate land for care homes
- Identify equestrian routes
- Allocate land for tree planting
- Provide for change of use/re-use of former employment areas

Council’s response

The Council has considered the case for including additional policies relating to the varied policy areas suggested but believes that there is insufficient justification for doing so. In summary, the policy matters raised are satisfactorily addressed in the following ways:

- The presumption in favour of sustainable development is set out in national policy
- Changes to policies DCP1 and ES1 now address adaptation issues
- The Council has considered the case for a reserve site(s) in the case of a housing shortfall. However, the preferred approach is a rapid review of the Local Plan
- Dark skies now addressed in policy ES7
- No need for farming and land use policy due to limits of planning system in controlling farming
- Various policies have strengthened the protection of rights of way (including bridleways) which provide appropriate routes for equestrian users
- The Council supports additional tourist accommodation and is not seeking to limit Air B and Bs
- Air and noise related issues are dealt with in a number of different policies including CP14, ES3, ES5 and in site specific policies



- Policy DCP2 now addresses the need for older person's accommodation and policy CP8 requires new development to provide for a range of different accommodation types to meet identified local needs.
- Areas for tree planting will be developed in cooperation with landowners and does not require allocation in a Local Plan
- Policy EI2 already provides for the regeneration of existing employment areas



Section 7.0 Delivery and monitoring

Support comments

- Welcome the clear message regarding the need for cross border and partnership/collaborative working, including on health and wellbeing
- A working group should be established to properly assess and mitigate the impact of development within the Local Plan on infrastructure within South Gloucestershire
- Please work with Gloucestershire Local Nature Partnership when devising a monitoring approach for the environmental outcomes of the Local Plan
- The delivery table will need updating over time
- The monitoring framework should include assessments of change in: local, sustainable transport networks; energy generation; food production; and ecological improvement

Objection comments

- Section is silent on how progress towards carbon neutrality will be measured, and what the current baseline is. To implement the target, more thought needs to be set out on measurement and monitoring
- Monitoring of employment land delivery should take place at earliest opportunity

Suggested wording changes

- Make reference to how the Council will deliver against carbon neutrality policies
- Identify ways in which cross boundary working will be delivered

Council's response

The section makes clear that a monitoring framework will be developed to assess the performance of the Local Plan over its course to 2040. The delivery of the Council's progress towards carbon neutrality is part of a wider series of proposals set out within the Council's approved CN 2030 Strategy and associated masterplan and monitoring of the Local Plan's contribution to meeting these objectives will form part of that programme. Certain policies include commitments to producing Supplementary Planning Documents which will need to consider the issue of monitoring as part of implementation proposals. Details of cross boundary working will form part of agreed Statements of Common Ground with adjoining authorities which are in preparation and will be published as soon as possible.



Appendix A – Potential changes to Settlement Development Limits

Support comments

- SDL-DUR01 at Shearing Close, Littlecombe, is supported
- Support SDL-HOR01 (Nupend development) and the other two small ones
- SDL-HOR06 is a sensible amendment on this property

Objection comments

- SDL-CBR01 The development was approved as an exception site and should remain as such for a reasonable period of time
- SDL-CAM01 The small alterations to accommodate development at Strawberry Field/Elstub Lane is insufficient
- SDL-WHI03 only incorporates a small area of the site proposed. There is no indication in the Draft Local Plan as to why this small area has been proposed to be included in the Settlement Development Limit and not the wider site area submitted

Suggested changes to Settlement Development Limits

- Berkeley: Consider that there are additional opportunities to the west of Berkeley for future development which could incorporate uses which are appropriate on the floodplain immediately to the west of the settlement boundary (i.e. open space/amenity space/nature conservation/community uses) and which could successfully deliver additional housing adjacent to the settlement
- Berkeley: The Canonbury Rise development, currently under construction, should be included within Settlement Development Limits
- Dursley: The Dursley SDL should be amended to include the garden of Hawthorn Villa, Woodmancote as defined by the hedge and fence line to the southeast of the main house
- Eastington: Expand settlement development limits to include land at Claypits Farm, Eastington to assist in meeting the housing needs over the plan period
- Hardwicke: Land allocated for strategic development should be included within the defined settlement boundaries for each corresponding settlement. In particular, Site G1 – Land South of Hardwicke should be included within the defined settlement limits of Hardwicke
- Hardwicke: Seek to promote a revision to the Hardwicke Settlement Boundary to include the SALA site ref. HAR014 Mayos Land Phase 3, east of Bristol Road, Hardwicke
- Horsley: Propose the inclusion of the residential garden at Manor Farm, Hollingham Lane within the Settlement Development Limits at Horsley
- Kingswood: The Settlement Development Limit for Kingswood needs to be updated to reflect the true extent of the existing built form and committed development sites



- Painswick: There should be a minor amendment to the Painswick Settlement Development Limit to include Briarfield House, Stroud Road and its associated curtilage
- South Woodchester: Suggest rationalisation of the settlement boundary at Woodlea, Bospin Lane, South Woodchester
- Whitminster: The Settlement Development Limit should be redrawn to include the current Parklands Orchard development, the field/land between Upton Gardens and the Village Playing Field and land to the south of Hyde Lane within the Whitminster Development Limits. This change of the Development Limit should gently increase the housing in future and keep it as a rural village

Council's response

The Council has reviewed each of the suggested changes to the settlement limits, assessing the existing development and natural feature characteristics of the locality and following any new development completion.

- The SDL proposed mapping changes in the 2019 Consultation Document Appendix A remain
- Parklands Orchard Farm at Whitminster completed and SDL will incorporate this within Whitminster SDL
- Chestnut Park Kingswood completed and SDL will incorporate this within Kingswood SDL
- Woodlea, Bospin Lane, South Woodchester change agreed with DM in 2020 to take account of existing buildings/elevated access at rear
- Betworthy Farm, Coaley completed and SDL will incorporate this within Coaley SDL



Appendix B – Suitable areas for renewable energy (solar and wind)

Support comments

- The development of renewable energy in the District will be essential to achieving the commitment to be Carbon Neutral by 2030
- It's good to see a local council identify potential areas for development. Areas not included should be subject to survey and where impacts can be made acceptable
- There should be as many sites for renewable energy generation as possible to generate as much as possible

Objection comments

Mapping Issues

- Given the importance of this medium for future power sources, the scale of the maps is too large, the maps are unreadable and hard to interpret
- Appendix B should be a chapter of the draft Local Plan identifying specific sites in the same way that the plan identifies residential and employment sites

Implementation Concerns

- Achieving carbon neutral status should not be delivered at the expense of other key objectives
- The renewable energy landscape sensitivity study should be updated to incorporate and address relevant Conservation Board guidance. The 'suitable area' maps should be reviewed and updated to take account of the landscape sensitivity study
- The Cotswolds AONB should not be considered as a suitable location for large scale wind and solar energy developments

Suggested wording changes

- Appendix B maps are titled as "*suitable areas for renewable energy*". Given the caveats/conditions within the related policy it may be helpful to rephrase as "*Potential suitable areas for renewable energy*"

Council's response

The maps of suitable areas for renewable energy will be provided on the Policies Map as detailed GIS layers which can be viewed at a variety of scales. Landscape sensitivity layers will also be shown on the Policies Map to allow the requirements of Policy ES2 to be addressed. The NPPF identifies the need to show suitable areas – addressing these as potentially suitable areas, builds in an element of confusion. Policy ES2 makes clear the purpose of these suitable areas



and the need for specific sites to satisfy a range of policy criteria, including the need to assess and address the impacts of the scheme.



Appendix C – Parking standards for vehicles and cycles

Support comments

- Welcome additional requirements for private cycle storage
- Welcome the flexible approach to parking spaces provision

Objection comments

- Promoting provision of ULEV charging points whilst also discouraging car use is inconsistent.
- The removal of vehicle parking standards will lead to on-street parking problems
- Reduced car use and parking is only viable with increased local employment or better public transport
- The need for electric charging points will increase the need for parking provision
- There should be provision for waste management in gardens to minimize use of highways and footpaths for wheelie bins etc.

Suggested wording changes

- It should state that allocated parking should be adjacent to the dwelling served

Council's response

The proposed changes to parking standards reflect recommendations arising from the Sustainable Transport Strategy and reflect changes within the NPPF, transport guidance and other national initiatives. Discouraging the use of the private car but requiring additional ULEV charging points for those that are required is not inconsistent. It is recognised that reduced car use does depend on a variety of factors including increased local employment and better public transport. Locating development in the best places to support active travel measures and public transport is also part of the equation. Detailed issues relating to the location of ULEV charging points and waste management facilities will be determined at the planning application stage, with reference to design guidance where appropriate.

4. Potential sites and alternatives

The Stroud Valleys

Brimscombe & Thrupp

PS01 Brimscombe Mill

Support comments

Support for urban, brownfield regeneration with opportunities for increased capacity and potential employment/ commercial development linked to the canal.

Key issues identified:

- Development should be linked to high quality cycling and walking infrastructure, road and junction improvements along the A419/ canal corridor and should maximise the opportunity to enhance blue corridor (water) linkages.
- Flood risk will require sequential test modelling
- Development will need to provide sufficient water space for boats to moor and turn around at the eastern end of the navigable section of the Cotswolds Canal.
- Impact on River Frome Local Wildlife Site will require detailed ecological appraisal and delivery of GI to Building with Nature standards

Objection comments

Delivery of the site questioned due to land ownership and drainage concerns.

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The site is allocated in the current adopted Local Plan and is located within the Stroud Valleys canal corridor where regeneration of this brownfield site would be in accordance with the development strategy. Whilst there are constraints such as heritage assets and potential flood risk which will need to be addressed at the planning application stage, there are no overriding constraints preventing allocation. The Council is actively progressing the regeneration of the adjacent site at Brimscombe Port and the restoration of the adjacent Thames and Severn Canal. The site is for sale and there is a reasonable expectation that the site will be taken forward during the lifetime of the Plan.

PS02 Brimscombe Port

Support comments

Support for brownfield regeneration with opportunities for increased capacity and potential employment/ commercial development linked to the canal

Key issues identified:

- Development should be linked to high quality cycling and walking infrastructure, road and junction improvements along the A419/ canal corridor, including improvements at the Brimscombe Corner Junction, and should maximise the opportunity to enhance blue corridor (water) linkages
- Flood risk will require sequential test modelling
- Development will need to provide sufficient water space for boats to moor and turn around at the eastern end of the navigable section of the Cotswolds Canal
- Medium sewerage risk - Further assessment and liaison with Severn Trent required
- Impact on River Frome Local Wildlife Site will require detailed ecological appraisal and delivery of GI to Building with Nature standards
- Potential impact on Rodborough Common SAC

Objection comments

The site is in active economic use. Viability questioned due to significant infrastructure costs and access difficulties.

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The site is allocated in the current adopted Local Plan and is located within the Stroud Valleys canal corridor where regeneration of this brownfield site would be in accordance with the development strategy. Whilst there are constraints such as heritage assets and potential flood risk which will need to be addressed at the planning application stage, there are no overriding constraints preventing allocation. The Council is actively progressing the regeneration of this site and the restoration of the Thames and Severn Canal basin with help and funding from various public agencies. Existing uses on-site have short term leases only and will need to vacate the site. A development partner will be selected by the Council shortly and delivery is expected as set out in the Local Plan.

Minchinhampton

PS05 East of Tobacconist Road

Support comments

Support for some development to meet local housing needs with opportunities to address specific local housing pressures, deliver community facilities and contributions towards improvements to local infrastructure.

Key issues identified:

- High sewerage risk - Further modelling required to assess scope for any sewerage capacity improvements in conjunction with high risk that surface water will be connected into the foul network
- Will require full ecological appraisal
- Impact on the Scheduled Ancient Monument and Minchinhampton Conservation Area should be mitigated in accordance with SALA Heritage Impact Appraisal recommendations

Objection comments

Key concerns identified:

- Contrary to national planning guidance for development within the Cotswolds AONB
- Scale of development
- Greenfield development and associated loss of campsite
- Car dependent development due to lack of employment provision and local employment opportunities
- Additional traffic adding to town centre congestion, pedestrian/ vehicle conflict and traffic using grazed Commons
- Access concerns
- Damaging impact on Cotswolds AONB and wider landscape character
- Impact on protected Commons SAC
- Impact on heritage/ archaeological assets

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The site is located at Minchinhampton a Tier 2 settlement and would be in accordance with the development strategy. The site will meet local housing needs arising from within the AONB and an 80 dwelling extension to Minchinhampton would not constitute major development within the AONB. The site has been assessed as being the best edge of settlement site in terms of landscape sensitivity to development and development will provide strategic landscaping to enhance the settlement edge in this location. The size of the site has now been reduced to only the northern portion of the draft site and vehicular access will now



be solely from the north, ensuring no impact on town centre congestion. Safe, convenient walking and cycling access to the centre will be from the west and south of the development. Whilst there are constraints such as the adjoining “Bulwarks” Scheduled Ancient Monument, the policy identifies the need to avoid direct impacts and mitigation measures can be dealt with at the planning application stage. There are no overriding constraints preventing allocation. The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation.

Nailsworth

PS06 New Lawn, Nailsworth

Support comments

Support for an appropriate scale of development, within urbanised area, with opportunities for improved community facilities in the Forest Green area and better public transport, cycle and walking linkages to Nailsworth town centre.

Key issues identified:

- Local need for small starter homes
- Further modelling required to assess scope for any sewerage capacity improvements in conjunction with high risk that surface water will be connected into the foul network.
- Impact on adjacent High Wood and Bowlas Wood Key wildlife site and Bunting Hill Key Wildlife Site

Objection comments

Key concerns identified:

- Loss of football stadium and impact on leisure/ tourism vitality of Nailsworth
- Car dependent location and will add to local traffic congestion
- Damaging impact on Cotswolds AONB
- Detrimental impact on High Wood and Bowlas Wood irreplaceable ancient semi-natural woodland

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. Development will be subject to the satisfactory relocation of Forest Green football club. The location of the site within Nailsworth, a Tier 2 settlement, is in accordance with the development strategy. Whilst there are constraints including ensuring existing community and sporting uses are replaced elsewhere and safeguarding and enhancing landscape boundary features and local biodiversity, which will need to be addressed at the planning application stage, there are no overriding constraints preventing allocation. Consultees raised issues relating to the impact on the Cotswolds AONB and High/Bowlas Woodland which will need to

be addressed at the planning application. The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation.

PS07 North of Nympsfield Road/Nortonwood Junction

Support comments

Support for an appropriate scale of development, on the edge of the urbanised area, with opportunities for improved community facilities in the Forest Green area and better public transport, cycle and walking linkages to Nailsworth town centre.

Key issues identified:

- Further modelling required to assess scope for any sewerage capacity improvements in conjunction with high risk that surface water will be connected into the foul network.
- Will require full ecological appraisal

Objection comments

Key concerns identified:

- Contrary to national planning guidance for development within the Cotswolds AONB
- Car dependent location and will add to local traffic congestion
- Damaging impact on Cotswolds AONB and wider landscape character
- Loss of rare species-rich hay meadows

Council's response

Land North of Nympsfield Road will not be taken forward in the Local Plan process. The site is located within the Cotswolds Area of Outstanding Natural Beauty (AONB) and national planning guidance advises that such a location is unlikely to be a suitable area to accommodate the unmet needs of adjacent areas, such as Nailsworth. The Council is intending to allocate a large site outside the AONB but within close proximity of this site that is more appropriate to meet the future housing needs of Nailsworth. This site is not associated with a settlement within the AONB and therefore is not a suitable location to meet needs arising from within the AONB.

Stroud

PS10 Railway land & car parks, Cheapside

Support comments

Support for mixed use, brownfield development with opportunities to improve access and connectivity to Stroud town centre and enhance land stability and sewerage infrastructure.

Key issues identified:

- Medium sewerage risk - Further assessment and liaison with Severn Trent required
- Impact on Stroudwater Canal Local Wildlife Site
- Impact on the Industrial Heritage Conservation Area should be mitigated in accordance with SALA Heritage Impact Appraisal recommendations

Objection comments

Key concerns identified:

- Viability due to significant site constraints
- Loss of town centre/ station parking and impact on Stroud Town Centre
- Impact on Industrial Heritage Conservation Area

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The location of the site within Stroud, a Tier 1 settlement, is in accordance with the development strategy. Whilst there are constraints such as neighbouring heritage assets and potential flood risk which will need to be addressed at the planning application stage, there are no overriding constraints preventing allocation. Consultees raised the issue of the loss of parking, however some parking to serve the town centre and station will be retained as part of the scheme. Whilst the site is not currently being actively promoted, there is a reasonable expectation that the site will be taken forward during the lifetime of the Plan.

PS11 Merrywalks Arches, Merrywalks

Support comments

Support for mixed use redevelopment of brownfield, under-used, town centre site.

Key issues identified:

- Flood risk will require sequential test modelling
- Will require full ecological appraisal



Objection comments

The site is more suitable for commercial development. Deliverability questioned due to significant level changes and associated ground stabilisation works.

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The location of the site within Stroud, a Tier 1 settlement, is in accordance with the development strategy. Whilst there are constraints such as the sites location within the Industrial Heritage Conservation Area, which will need to be addressed at the planning application stage, there are no overriding constraints preventing allocation. Consultees raised the issue of deliverability due to the level changes within the site, however this is not seen as a significant enough issue to prevent re-development on the site. Whilst the site is not currently being actively promoted, there is a reasonable expectation that the site will be taken forward during the lifetime of the Plan.

PS12 Police Station/Magistrates Court, Parliament Street

Support comments

Support for mixed use redevelopment of brownfield, town centre site with opportunities for good urban design respecting local heritage and for delivering improvements to surface water drainage.

Key issues identified:

- Will require full ecological appraisal

Objection comments

Need to resolve the provision of a replacement police station.

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The site is a centrally located brownfield site where the owners are working actively with the District Council to consider redevelopment opportunities in the longer term. The potential need for a replacement Police station is referred to in the policy. All sites will require ecological appraisal.



PS13 Central river/ canal corridor

Support comments

Support for brownfield regeneration close to Stroud town centre with opportunities to deliver comprehensive mixed use redevelopment including a small canal basin, green spaces, sports facilities, cycle and footpath infrastructure linked to the canal.

Key issues identified:

- Retention of Lodgemore Mills employment site
- Medium sewerage risk - Further assessment and liaison with Severn Trent required
- Impact on the Industrial Heritage Conservation Area should be mitigated in accordance with SALA Heritage Impact Appraisal recommendations
- Impact on Stroudwater Canal and River Frome Local Wildlife Sites will require detailed ecological appraisal and delivery of GI to Building with Nature standards

Objection comments

Key concerns identified:

- Deliverability questioned due to flood risk, access constraints and significant loss of B1 floorspace
- Loss of canal's natural setting and environment

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site has potential for partial redevelopment, maintaining and enhancing employment provision and enhancing the IHCA. However, there are major challenges, including flood risk, contaminated land and difficult access issues to address. Whilst landowners within the area are actively considering opportunities for redevelopment, it is premature to allocate the site for redevelopment in this Local Plan as too many issues remain unresolved. However, the area is identified within Policy EI2 as an area where there are opportunities to regenerate employment land for mixed use redevelopment and proposals which can satisfactorily address the outstanding constraints will be supported through the development management process.



The Stonehouse Cluster

Leonard Stanley

PS16 South of Leonard Stanley Primary School

Support comments

Support for small sustainable extension to existing village

Key issues identified:

- Will require full ecological appraisal

Objection comments

Key concerns identified:

- Greenfield development and associated loss of habitat
- Inadequate local services and facilities to cope with additional development
- Inadequate sewerage infrastructure
- Lack of public transport
- Access to development
- Loss of school expansion land
- Increased risk of surface water flooding

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The location of the site within Leonard Stanley, a Tier 3a settlement, is in accordance with the development strategy and the area has the facilities and services to ensure the development is a sustainable extension to the village. The County Council has confirmed that the land is not required for education purposes. The development will be required to address drainage and sewerage matters at the planning application stage and the Infrastructure Delivery Plan has not identified this as a major constraint within this area. The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation.

PS42 Land off Dozule Close

Support comments

Support for small sustainable extension to existing village

Key issues identified:



- Will require full ecological appraisal

Objection comments

Key concerns identified:

- Greenfield development and associated loss of habitat
- Inadequate local services and facilities to cope with additional development
- Inadequate sewerage infrastructure
- Lack of public transport
- Access to development
- Loss of school expansion land
- Increased risk of surface water flooding

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The location of the site within Leonard Stanley, a Tier 3a settlement, is in accordance with the development strategy. Whilst there are constraints including incorporating existing Public Rights of Way within landscaped open space, retaining the southern part of the site in open space uses, and safeguarding and enhancing local biodiversity, which will need to be addressed at the planning application stage, there are no overriding constraints preventing allocation. Consultees raised issues relating to access and foul and surface water drainage which will need to be addressed at the planning application. The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation.

Stonehouse

PS17 Magpies site, Oldends Lane

Support comments

Support for small scale brownfield redevelopment, safeguarding land for a future bridge across the railway at Oldends Lane, improving links to Stonehouse town centre, and enabling the delivery of improved community facilities.

Key issues identified:

- Will require full ecological appraisal



Objection comments

- Concern that development does not adversely impact existing sports pitches/ recreation facilities at Oldends Lane.

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The site is located at Stonehouse and would be in accordance with the development strategy. The boundary of the site is proposed to be extended to make explicit the relationship between the community facilities to be improved and the enabling housing development. The housing development would enable the Town Council to enhance existing community facilities and provide for new community uses at the adjacent Oldends Lane recreation area. The site lies adjacent to the Bristol-Birmingham main railway line and future plans for a pedestrian bridge across the railway line for pedestrians and cyclists will require land on this site to be safeguarded for these purposes. The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation.

PS19 North/northwest Stonehouse

Support comments

Support for extension to existing strategic development at Great Oldbury, including a primary school and employment, with good sustainable transport links and public transport access to employment, community facilities and services.

Key issues identified:

- Masterplanned integration with existing Great Oldbury development to maximise use of sustainable transport and access to local facilities and services
- Subject to sensitive phasing of new homes, infrastructure and local employment
- Should deliver new/ enhanced footpath and cycle links to Stonehouse, maximising connectivity to Stonehouse Station, and a financial contribution to reopening Bristol Road Station
- Will need to include any required mitigation due to increased risk from increased use of the Old Ends vehicular level crossing and Stagholt, Stonehouse 2 and Little Australia footpath level crossings
- High sewerage risk will require further modelling to assess scope of any capacity requirements in addition to the existing growth scheme
- Will require detailed ecological appraisal to minimise the impact on River Frome Local Wildlife Site. Strategic landscaping should include a substantial buffer of natural habitat to the Local Wildlife Site and should be delivered to Building with Nature standards
- Opportunity for significant tree planted buffers on the northern boundary and to the railway to integrate development into the wider landscape and mitigate railway noise



Objection comments

Key concerns identified:

- Area has already had significant development
- Car dependent development will result in increased traffic congestion on A419 and Oldends Lane/ Bath Road junction
- Insufficient sustainable transport infrastructure, including public transport, pedestrian routes and cycle linkages across railway to Stonehouse town centre and associated services and facilities
- Potential landscape and visual impact from Cotswolds AONB, including key views from Haresfield Beacon and Topograph Hill
- Increased recreational pressure on Haresfield Beacon and Standish Woods

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that this site is appropriate for allocation in the Local Plan. The wording of the policy and supporting text seeks to address specific concerns raised during consultation.

A hybrid development strategy based upon concentrated development at our main towns and well located new settlements performs much better than dispersal options. This urban extension will contribute to the District's housing and employment needs at a location which maximises the potential for residents to use active travel and public transport to access jobs, services and facilities.

The site performs relatively well in the Sustainability Appraisal against reasonable alternatives, using a range of sustainability objectives. The Habitats Regulation Assessment has not identified any issues or impacts on biodiversity sites which are not capable of mitigation.

Whilst there are constraints, including proximity to the Bristol-Birmingham rail line and visibility from the Cotswolds escarpment, strategic landscaping along boundaries will minimise any potential amenity or visual impacts. The development will enhance planned open space provision at Great Oldbury and will have no direct recreational impacts on Haresfield Beacon and Standish Woods. The development will link seamlessly with the adjoining Great Oldbury development whilst providing a well planted northern edge to the development.

There are positive benefits related to proximity to the local centre and services and facilities at Great Oldbury and employment at Stonehouse, with the development providing opportunities to improve walking and cycling links within the local area and to connect to bus services along the A419.

The transport assessment work has identified no major issues and opportunities for sustainable transport measures and modest highway mitigation works to address traffic and safety issues. The Infrastructure Delivery Plan has identified no major issues which cannot be addressed.



The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation. The scale of growth required in the District means that a number of strategic sites will be in delivery at the same time. The range of types of sites, locations, different promoters and delivery mechanisms will ensure there is no market saturation.

PS20 M5 Junction 13

Support comments

Support for key issues identified:

- Should deliver new/ enhanced footpath and cycle links to Stonehouse, maximising connectivity to Stonehouse Station, and a financial contribution to reopening Bristol Road Station
- Detailed development proposals will require robust Travel Plans which layout measures to reduce commuting on the M5
- The development brief for the site south of the A419 must include the restoration of the Stroudwater Navigation 'Missing Mile'
- High sewerage risk will require further modelling to assess scope of any capacity requirements in addition to the existing growth scheme and address potential surface water flood risk
- Will require detailed ecological appraisal to minimise the impact on Stroudwater Canal and River Frome Local Wildlife Sites. Strategic landscaping should include a substantial buffer of natural habitat between the watercourse and new development and should be delivered to Building with Nature standards
- Will require sensitive building design and strategic landscape screening, including tree planting, to minimise wider impact on Cotswolds AONB and key views from Haresfield Beacon and Topograph Hill

Objection comments

Key concerns identified:

- Greenfield development and associated impact on rural character and amenity, including the setting of the canal
- Over provision of employment land
- Detrimental impact on existing employment sites and regeneration of brownfield sites
- Car dependent location, unrelated to existing settlements or sustainable transport infrastructure
- Impact on M5 Junction 13, A419 and traffic congestion
- Relocation of stadium and impact on local amenity, including William Morris College



- Areas within the flood zone should be prioritised for strategic landscaping to provide flood risk and noise mitigation
- Impact on heritage assets including the Industrial Heritage Conservation Area (IHCA) and listed buildings

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The wording of the policy and supporting text seeks to address specific concerns raised during consultation.

The recommended employment strategy for the Local Plan seeks to provide for new employment land and support existing employment areas located at the key employment property market areas identified in the ELR: south of Gloucester; within the M5/A38 corridor, at Stonehouse, Stroud, Cam/Dursley, Berkeley/Sharpness; and the Stroud Valleys. The overall quantum of employment land is intended to meet labour supply requirements and to deliver the aspirations of GFirst Local Industrial Strategy.

The site performs relatively well in the Sustainability Appraisal against reasonable alternatives, using a range of sustainability objectives. The Habitats Regulation Assessment has not identified any issues or impacts on biodiversity sites which are not capable of mitigation.

Whilst there are constraints, including impacts upon the Industrial Heritage Conservation Area (IHCA) and flood risk, these are capable of mitigation through layout and design measures. A comprehensive mitigation package for impacts upon the IHCA will require a Canal cut, towpath and operational uses as part of the restoration of the Stroudwater Canal to navigable uses from Saul Junction to Stroud. The location of primarily grass training pitches within the IHCA will minimise flood risk, minimise the impact of built development on the IHCA and ensure uses are compatible with sensitive neighbouring uses including William Morris House.

There are positive benefits related to significantly improved facilities for Forest Green Rovers Football Club, a high quality business park focussed on green technologies in an accessible location and the potential to significantly improve sustainable transport services along the A419 corridor including multi-modal transport interchange facilities, enhancing local walking and cycling routes and contributions to the reopening of Stonehouse railway station.

The transport assessment work has identified no major issues and opportunities for sustainable transport measures and modest highway mitigation works to address traffic and safety issues. The Infrastructure Delivery Plan has identified no major issues which cannot be addressed.

The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation. The scale of growth required in the District means that a number of strategic sites will be in delivery at the same time. The range of types of sites, locations, different promoters and delivery mechanisms will ensure there is no market saturation.

Cam & Dursley Cluster

Cam

PS21 Land adjacent to Tilsdown House

Support comments

Support for small scale development within existing settlement development limits, well placed for public transport, walking and cycling to nearby services and facilities, including mainline rail services.

Key issues identified:

- Impact on Grade II Listed Tilsdown House should be mitigated in accordance with SALA Heritage Impact Appraisal recommendations
- Will require full ecological appraisal

Objection comments

Key concerns identified:

- Access on to A4135 and impact on traffic flow
- Increased surface water flood risk to existing houses on opposite side of Tilsdown
- Impact on historic setting of Grade II Listed Tilsdown House
- Loss of green space within built up area

Council's response

The site has now received planning permission and has been removed as an allocation in the Pre-Submission Plan.

PS24 West of Draycott

Support comments

Support for some development delivering a primary school and access/ parking improvements for Jubilee Fields Playing Field linked to high quality cycling and walking linkages, road and junction improvements along the A4135 and Box Road, and improvements to Cam and Dursley Station.

Key issues identified:

- High sewerage risk – Further modelling required to assess the scope of any capacity improvements at Coaley Sewage Treatment Works



- Detailed design should maximise bus routing potential and include provision of high quality bus shelters, secure cycle parking and dedicated parking spaces for “stop and drop” activities
- Will need to include any required mitigation due to increased risk from increased use of the level crossings Dursley 28 Level crossing – footpath crossing and Slimbridge 46 Level Crossing
- Development will be required to minimise the exposure of noise-sensitive receptors to strategic traffic including a landscape buffer and acoustic bund to be located to avoid encroachment onto highway land associated with the Strategic Rail Network
- Will require full ecological appraisal and delivery of GI to Building with Nature standards
- Development should include tree planting to minimise the impact of development when viewed from the Cotswolds AONB and should be designed not to obscure sight of Slimbridge’s iconic Church Spire

Objection comments

Key concerns identified:

- Coalescence with Slimbridge and proposed strategic development site PS37 Land at Wisloe
- Greenfield development and associated loss of agricultural land and natural habitats
- Overdevelopment and potential risk to deliverability due to strategic development concentrated in the south of the District
- Scale of development and impact on local amenity, services and facilities
- Impact on local and strategic highway network including traffic congestion
- Insufficient capacity of sewerage and drainage infrastructure to cope with additional development
- Noise pollution from proximity to railway line and M5 motorway
- Detrimental impact on the Severn Vale landscape, visible from the Cotswold Escarpment

Council’s response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that this site is appropriate for allocation in the Local Plan. The wording of the policy and supporting text seeks to address specific concerns raised during consultation.

A hybrid development strategy based upon concentrated development at our main towns and well located new settlements performs much better than dispersal options. This urban extension will contribute to the District’s housing needs at a location which maximises the potential for residents to use active travel and public transport to access jobs, services and facilities.

The site performs relatively well in the Sustainability Appraisal against reasonable alternatives, using a range of sustainability objectives. The Habitats Regulation Assessment has not identified any issues or impacts on biodiversity sites which are not capable of mitigation.



Whilst there are constraints, including proximity to the M5 motorway and visibility from the Cotswolds escarpment, these are capable of mitigation through layout and design measures. The location of the railway and M5, together with on-site strategic landscaping will ensure there is no physical or visual threat to coalescence with Wisloe or nearby settlements. Conformity with the Cam NDP design code will ensure integration with the rest of Cam.

There are positive benefits related to proximity to Cam & Dursley station, employment at Draycott and local services and facilities at Cam local centre, with the development providing opportunities to improve walking and cycling links within the local area and to connect to bus services along the A4135 and A38.

The transport assessment work has identified no major issues and opportunities for sustainable transport measures and modest highway mitigation works to address traffic and safety issues. The Infrastructure Delivery Plan has identified no major issues which cannot be addressed.

The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation. The scale of growth required in the District means that a number of strategic sites will be in delivery at the same time. The range of types of sites, locations, different promoters and delivery mechanisms will ensure there is no market saturation.

PS25 East of River Cam

Support comments

Support for some development linked to high quality cycling and walking linkages, road and junction improvements along the A4135 and Box Road, and improvements to Cam and Dursley Station.

Key issues identified:

- Flood risk will require sequential test modelling
- Medium sewerage risk – Further modelling required to assess the scope of any capacity improvements at Coaley Sewage Treatment Works.
- Will require sensitive design close to 50m contour line to minimise impact on wider landscape, including the setting of the Cotswolds AONB
- Will require full ecological appraisal
- Will require sensitive treatment of the River Cam corridor to safeguard protected species and manage flood risk

Objection comments

Key concerns identified:



- Greenfield development and associated loss of agricultural land and amenities, including well used public footpaths
- Scale of development and impact on local services and facilities
- Impact on local and strategic highway network including traffic congestion
- Lack of any access solution
- Potential flood and pollution risk
- Detrimental impact on Rackleaze wildlife area and River Cam corridor

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that this site is appropriate for allocation in the Local Plan. The wording of the policy and supporting text seeks to address specific concerns raised during consultation.

The site will complete a strategic allocation planned for through the current adopted Local Plan. This urban extension will contribute to the District's housing needs at a location which maximises the potential for residents to use active travel and public transport to access jobs, services and facilities.

The site performs relatively well in the Sustainability Appraisal against reasonable alternatives, using a range of sustainability objectives. The Habitats Regulation Assessment has not identified any issues or impacts on biodiversity sites which are not capable of mitigation.

There are positive benefits related to connecting the existing strategic development North East Cam back to Cam local centre and delivering an important section of the Uley-Dursley-Cam Greenway, connecting Cam local centre, via the disused railway cycle and walking route to Box Road, Cam & Dursley station. The design will ensure no adverse impact on the Rackleaze wildlife area.

The transport assessment work has identified no major issues and opportunities for sustainable transport measures and modest highway mitigation works to address traffic and safety issues. The Infrastructure Delivery Plan has identified no major issues which cannot be addressed.

The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation. The scale of growth required in the District means that a number of strategic sites will be in delivery at the same time. The range of types of sites, locations, different promoters and delivery mechanisms will ensure there is no market saturation.

Dursley

PS27 1-25 Long Street

Support comments

Support for mixed use redevelopment of brownfield, town centre site with opportunities for retail and recreation uses

Key issues identified:

- Will require full ecological appraisal

Objection comments

Key concerns identified:

- Access and loss of parking
- Impact on Dursley Conservation Area and Listed Buildings

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The location of the site within Dursley, a Tier 1 settlement, is in accordance with the development strategy. Whilst there are specific site issues, including impacts on designated heritage assets and local biodiversity, access and multiple ownership, which will need to be addressed at the planning application stage, there are no overriding constraints preventing allocation. The site is not currently being actively promoted however there is a reasonable expectation that the site will be taken forward during the lifetime of the Plan.

PS28 The Old Dairy / Land off Prospect Place

Support comments

Support for mixed use redevelopment of brownfield, town centre site with opportunities for environmental enhancement and improvements to servicing and access arrangements for local businesses.

Key issues identified:

- Will require full ecological appraisal

Objection comments

Key concerns identified:



- Impact on access and parking arrangements for existing residential and commercial properties
- Surface water drainage issues at junction with May Lane
- Protected species present on site
- Impact on Dursley Conservation Area and Listed Buildings

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The location of the site within Dursley, a Tier 1 settlement, is in accordance with the development strategy. Whilst there are specific site issues, including impacts on designated heritage assets and local biodiversity, access and multiple ownership, which will need to be addressed at the planning application stage, there are no overriding constraints preventing allocation. Consultees raised issues relating to the shared use of the private access lane off May Lane and the impact on existing residents and commercial properties at Prospect Place and Parsonage Street which have been taken forward in the policy wording as a requirement to deliver improved access, turning and servicing arrangements as part of allocated development of the site. The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation.

The Gloucester Fringe

Hardwicke and Hunts Grove

PS30 Hunts Grove extension

Support comments

Support for continued allocation as an extension to existing strategic development at Hunts Grove with good sustainable transport access, including public transport connections, to employment, community facilities and services and potential to reduce commuting by car.

Key issues identified:

- Development should include provision of community facilities, in particular space/ building for youth club and community group use
- Will require highway capacity improvements to M5 Junction 12 with A38 and surrounding road network in association with robust Travel Plans to reduce commuting on the M5
- Medium risk to sewer network and high surface water drainage risk will require further modelling and potential need for upgrades as part of an overarching area drainage strategy
- Impact on priority and protected species and on existing semi-natural broadleaved woodland will require detailed ecological appraisal and delivery of GI to Building with Nature standards
- Will require noise and air pollution mitigation

Objection comments

Key concerns identified:

- Potential risk to deliverability due to proximity to other strategic allocation proposals at G1 South of Hardwicke and G2 Land at Whaddon
- Role in meeting evidenced need for additional housing south of Gloucester
- Impact on peak hour capacity of M5 Junction 12
- Noise and air pollution from proximity to M5

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that this site is appropriate for allocation in the Local Plan.

The site will complete a strategic allocation planned for through the current adopted Local Plan. This urban extension will contribute to the District's housing needs at a location which maximises the potential for residents to use active travel and public transport to access jobs, services and facilities.



A hybrid development strategy based upon concentrated development at our main towns and well located new settlements performs much better than dispersal options. This strategic housing development will contribute to the District's housing needs at a location which maximises the potential for residents to use active travel and public transport to access jobs, services and facilities.

The site performs relatively well in the Sustainability Appraisal against reasonable alternatives, using a range of sustainability objectives. The Habitats Regulation Assessment has not identified any issues or impacts on biodiversity sites which are not capable of mitigation.

Whilst there are constraints, including proximity to the M5 and flood risk, these are capable of mitigation through layout and design measures.

Whilst the site is close to the edge of Gloucester, the site will complete the Hunts Grove development, which has recently been established as a separate Stroud District parish and will qualify as a Stroud Tier 2 settlement, once the planned local centre has been provided. There are also positive benefits related to supporting the local centre and range of community services to be provided at Hunts Grove, proximity to the A38 and the ability to connect to strategic bus services and proximity to jobs, services and facilities within the local area.

The transport assessment work has identified no major issues and opportunities for sustainable transport measures and contribution to highway mitigation works to address traffic and safety issues. The Infrastructure Delivery Plan has identified no major issues which cannot be addressed.

The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation. The scale of growth required in the District means that a number of strategic sites will be in delivery at the same time. The range of types of sites, locations, different promoters and delivery mechanisms will ensure there is no market saturation.

PS32 South of M5 / J12

Support comments

Support as a good location for strategic growth with sustainable transport access, including public transport.

Key issues identified:

- Potential for employment-led mixed use development including housing, local retail and community uses
- Will require highway capacity improvements to M5 Junction 12 with A38 and surrounding road network in association with robust Travel Plans to reduce commuting on the M5
- High sewerage and surface water drainage risk will require further modelling and potential need for upgrades as part of an overarching area drainage strategy



- Will require full ecological appraisal including impact on identified ancient oak trees and required mitigation measures

Objection comments

Key concerns identified:

- Greenfield development and associated landscape impact on Severn Valley corridor and southern approach to Gloucester
- Impact of development on identified ancient oak trees classified as irreplaceable habitat

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The location of the site, as an extension to an existing high value key employment site, is in accordance with the development strategy for strategic employment growth and there are no overriding constraints preventing allocation. The policy wording includes requirements for the development to ensure that the scale and bulk of buildings adjacent to the south eastern part of the site, the visual gap and the nature and extent of strategic landscaping, protect the heritage assets and their immediate settings at adjacent Haresfield and wider views from the AONB escarpment. Trees and hedgerows will be protected on the boundaries of the site. The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation.

PS43 Javelin Park

Support comments

- Good location for strategic employment growth and accessible via an existing frequent bus service between Gloucester and Stroud

Key issues identified:

- Any development should be net carbon neutral
- Opportunity to reuse heat discharge
- Subject to improved rail links from Bristol to Javelin Park
- Subject to full ecological appraisal
- Further liaison with Severn Trent and modelling required to determine the cumulative impact of proposed site allocations
- Subject to addressing capacity issues at J12 M5 and surrounding roads, robust travel plans in accordance with a sustainable transport strategy to reduce commuting on the M5
- Proposed size of allocation unviable. Larger site proposed for allocation offering capacity for large scale modern warehousing, not currently provided for in Draft Plan & opportunity for more meaningful structural landscaping/ Green Infrastructure (GI)



Objection comments

Key concerns identified:

- Greenfield development
- Further detract from Severn Valley corridor and approach to Gloucester
- Site allocation text should specifically reference the need to safeguard the efficient and effective operations of adjacent existing permitted / allocated waste management infrastructure

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The location of the site, as an extension to an existing high value key employment site, is in accordance with the development strategy for strategic employment growth and there are no overriding constraints preventing allocation. A southerly extension to the site will provide a more deliverable footprint for the development. Supporting text wording includes requirements for the development to ensure a high quality of design and landscaping that minimises any potential visual impacts upon the heritage assets and their immediate settings at adjacent Haresfield and wider views from the AONB escarpment. Additional wording will ensure that adjoining waste management infrastructure is safeguarded. The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation.

G1 South of Hardwicke

Support comments

Support as a good location for strategic growth with sustainable transport access, including public transport connections, to employment, facilities and services and potential to reduce commuting by car.

Key issues identified:

- Development should include provision of community facilities, including access to waterspace, linked to the Gloucester and Sharpness Canal, and improved facilities for Hardwicke Rangers Youth Football Club
- Will require highway capacity improvements to M5 Junction 12 with A38 and surrounding road network in association with robust Travel Plans to reduce commuting on the M5
- Development should provide high quality bus facilities on the A38 Bristol Road maximising active travel and facilitated 'last mile' access
- Development should deliver significant GI improvements and active travel connections with key linkages to the Gloucester and Sharpness Canal towpath, planned station at Hunts Grove and local strategic employment sites



- High sewerage risk and surface water drainage will require further modelling to assess scope of any capacity improvements and potential need for upgrades as part of an overarching area drainage strategy
- Subject to full ecological appraisal to determine presence of national priority habitat, impact on protected species and necessary mitigation with delivery of GI to Building with Nature standards

Objection comments

Key concerns identified:

- Greenfield development and associated loss of farmland, wildlife habitat and rural character
- Scale of development and impact on Hardwicke village and local community
- Potential risk to deliverability due to proximity to other strategic allocation proposals at PS30 Hunts Grove Extension and G2 Land at Whaddon
- Role in meeting evidenced need for additional housing south of Gloucester
- Impact on peak hour capacity of M5 Junction 12
- Capacity of local infrastructure, facilities and services
- Surface water flooding and potential impacts of pollution to Shorn Brook, including protected species
- Impact on heritage assets including Grade II listed St Nicholas Church

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that this site is appropriate for allocation in the Local Plan. The wording of the policy and supporting text seeks to address specific concerns raised during consultation.

A hybrid development strategy based upon concentrated development at our main towns and well located new settlements performs much better than dispersal options. This strategic housing development will contribute to the District's housing needs at a location which maximises the potential for residents to use active travel and public transport to access jobs, services and facilities.

The site performs relatively well in the Sustainability Appraisal against reasonable alternatives, using a range of sustainability objectives. The Habitats Regulation Assessment has not identified any issues or impacts on biodiversity sites which are not capable of mitigation.

Whilst there are constraints, including impacts on local heritage, flood risk and gas mains on-site, these are capable of mitigation through layout and design measures. Strategic landscaping buffers around the site and a strong design code will prevent adverse impacts on the countryside and Sharpness & Gloucester Canal.

Whilst the site is close to the edge of Gloucester, the site is directly related to the Tier 3a village of Hardwicke and development will provide a new local centre for the village and enhance other community services and facilities identified within the Neighbourhood Plan.



There are also positive benefits related to opportunities to remove through traffic from local rural lanes, proximity to the A38 and the ability to connect to strategic bus services and proximity to jobs, services and facilities within the local area.

The transport assessment work has identified no major issues and opportunities for sustainable transport measures and contribution to highway mitigation works to address traffic and safety issues. The Infrastructure Delivery Plan has identified no major issues which cannot be addressed.

The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation. The scale of growth required in the District means that a number of strategic sites will be in delivery at the same time. The range of types of sites, locations, different promoters and delivery mechanisms will ensure there is no market saturation.

Whaddon

G2 Land at Whaddon

Support comments

Support as a good location for strategic growth with sustainable transport access, including public transport connections, to employment, facilities and services and potential to reduce commuting by car.

Key issues identified:

- Will require highway capacity improvements to M5 Junction 12 and surrounding road network in association with robust Travel Plans to reduce commuting on the M5
- Development should be designed to maximise opportunities for the use of sustainable transport options, including bus services and active travel links, and improve connectivity across the railway line
- Development should be phased to ensure early delivery of sustainable transport choices
- High sewerage risk will require further modelling to assess scope of any capacity requirements in addition to the existing growth scheme for the south of Gloucester
- Will need to include any required mitigation due to increased risk from increased use of the Brookthorpe footpath level crossing
- Will require noise and air pollution mitigation
- Subject to full ecological appraisal with delivery of GI to Building with Nature standards including the potential to enhance the identified wildlife corridor linking Robinswood Hill Local Wildlife Site to wider countryside
- Impact on heritage assets, including Grade II* listed St May's Church should be mitigated with regard to SALA Heritage Impact Appraisal recommendations

Objection comments



Key concerns identified:

- Greenfield development and associated loss of farmland, wildlife habitat and rural character
- Scale of development and capacity of local infrastructure, facilities and services
- Potential risk to deliverability due to proximity to other strategic allocation proposals at PS30 Hunts Grove Extension and G1 Land south of Hardwicke
- Role in meeting evidenced need for additional housing south of Gloucester Impact on peak hour capacity of M5 Junction 12
- Additional flood risk from development within functional floodplain
- Impact on protected species
- Visual impact on setting of Cotswolds AONB
- Impact on heritage assets

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that this site is appropriate for safeguarding to meet the needs of Gloucester City in the Local Plan. The wording of the policy and supporting text seeks to address specific concerns raised during consultation.

This site is not associated with any established Stroud settlement set out within the settlement hierarchy. However, the site relates well to the urban edge of Gloucester and this site offers the potential to contribute to Gloucester City's housing needs at a location which maximises the potential for residents to use active travel and public transport to access jobs, services and facilities.

The site performs relatively well in the Sustainability Appraisal against reasonable alternatives, using a range of sustainability objectives. The Habitats Regulation Assessment has not identified any issues or impacts on biodiversity sites which are not capable of mitigation.

Whilst there are constraints, including proximity to M5, Cotswolds escarpment and impacts on local heritage and flood risk, these are capable of mitigation through layout and design measures. Strategic landscaping buffers will protect local amenity and adverse impacts on the AONB, accessible natural green space along Daniels Brook will assist with addressing wider flood risk in the area and a sensitive layout and design approach will conserve local heritage assets including Whaddon Church.

There are also positive benefits related to proximity to the A4173 and the ability to connect to strategic bus services and proximity to jobs, services and facilities within the local area.

The transport assessment work has identified opportunities for sustainable transport measures and contribution to highway mitigation works to address traffic and safety issues. The Infrastructure Delivery Plan has identified no major issues which cannot be addressed.

The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation. The scale of growth required in the District means that a number of strategic sites will be in delivery at the same time. The range of types of sites,



locations, different promoters and delivery mechanisms will ensure there is no market saturation.



The Berkeley Cluster

Berkeley

PS33 Northwest of Berkeley

Support comments

Support for small scale extension to existing settlement to meet local housing needs with opportunities to deliver community facilities and improvements to local infrastructure.

Key issues identified:

- Development should deliver improved sustainable transport options including public transport, pedestrian and cycle links and support for Vale of Berkeley Heritage Railway.
- Will require further assessment of capacity at the downstream pumping station (14388)
- Will require full ecological appraisal

Objection comments

Key concerns identified:

- Combined scale of development at PS34 Sharpness Docks, PS35 Land at Focus School, Wanswell and PS36 New settlement at Sharpness
- Greenfield development and associated loss of agricultural land, countryside and natural habitat.
- Car dependent development, remote from transport corridors and employment
- Impact on local and strategic highway network including traffic congestion
- Inadequate local infrastructure, services and facilities
- Impact on highway safety using rural lanes and designated National Cycle Route 41
- Local surface water flooding and increased floodrisk
- Poor housing sales within local area

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The site is located at Berkeley and would be in accordance with the development strategy. The site performs better than alternative locations around the settlement edge in terms of landscape sensitivity. Whilst there are constraints, including flood risk, development will provide a landscaped park to include flood risk attenuation and enhancements to support local biodiversity particularly connections to The Fishers woodland north of the site. The site will provide walking and cycling routes connecting to the local network and is close to main bus routes into Berkeley centre. The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation.



Newtown & Sharpness

PS34 Sharpness Docks

Support comments

Support for continued allocation and brownfield regeneration with opportunities for commercial and tourism development linked to the operational docks

Key issues identified:

- Impact on the Severn Estuary designated SAC, SPA and Ramsar site, Sharpness Docks Local Wildlife site and national priority species will require a detailed Environmental Impact Assessment before any decision is taken as to whether land is suitable for development.
- Development should be linked to local highway improvements and improved accessibility to A38 corridor.
- Development should deliver improved sustainable transport options including public transport, pedestrian routes and support for Vale of Berkeley heritage railway.
- Flood risk will require sequential test modelling
- Will need to include any required mitigation due to increased risk from increased use of Oldminster footpath level crossing
- Development will need to safeguard the efficient and effective operations of the working port and existing, permitted waste management infrastructure.

Objection comments

Key concerns identified:

- Scale of development and impact on local amenity, services and facilities
- Greenfield development and associated loss of natural habitats and rural setting of the canal.
- Area should be prioritised for recreation, tourism, natural flood management and to deliver Biodiversity Net Gain offset from other allocations
- Potential risk to deliverability due to proximity to other strategic allocation proposals
- Inadequate highway infrastructure and public transport access
- Flood risk
- Located within potential blast zone
- Impact on working port and future growth potential
- Ecological impact on designated sites and protected species from new development, flood protection and increased recreational pressure
- Impact on heritage assets



Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that this site is appropriate for allocation in the Local Plan.

The site is an existing allocation within the current adopted Local Plan and has been thoroughly assessed previously through the process of examining that Plan.

The site performs relatively well in the Sustainability Appraisal against reasonable alternatives, using a range of sustainability objectives. The Habitats Regulation Assessment has identified potential impacts on Severn Estuary designations but the policy and supporting text require substantial mitigation measures to ensure there are no significant impacts and potential benefits from allocation.

Whilst there are constraints, including flood risk, land contamination and proximity to a working port, these are capable of mitigation through layout and design measures. There has been detailed work on layout matters to ensure that development will be safe from any potential safety incidents at the southern Docks. The housing is specifically required to deliver the leisure and tourism led vision for the northern Sharpness Docks. The vision will positively enhance heritage assets within the area.

There are positive benefits related to the regeneration of the Berkeley/Sharpness area, with the regeneration of the Sharpness Docks complementing the regeneration of the former Berkeley Power Station for employment uses and the proposed new settlement, with the promoters working with the Berkeley Vale Railway to bring back passenger services to the Sharpness Branchline for both tourism and commuting purposes. An enhanced rail branch line also provides the opportunity to achieve a freight railhead at the Docks.

The transport assessment work has identified a range of highway mitigation measures to ensure traffic and safety issues can be addressed and also opportunities for sustainable transport measures to provide realistic options to the use of the private car. The Infrastructure Delivery Plan has identified no major issues which cannot be addressed.

The Canal and River Trust is actively delivering its vision for Sharpness and a current planning application is at an advanced stage within the decision making process.

PS35 Land at Focus School, Wanswell

Support comments

Support for small scale brownfield redevelopment to meet local housing needs with opportunities to deliver community facilities and improvements to local infrastructure.

Key issues identified:

- Development should deliver improved sustainable transport options including public transport, pedestrian and cycle links between Wanswell and Berkeley and support for Vale of Berkeley Heritage Railway



- Will require further assessment of capacity at the downstream pumping station (15432)
- Will require full ecological appraisal
- Potential for expansion to include adjoining parcel of land and other available land owned by TBE (The Berkeley Estate)

Objection comments

Key concerns identified:

- Combined scale of development with PS33 Northwest of Berkeley, PS34 Sharpness Docks and PS36 New settlement at Sharpness
- Loss of school site and associated playing fields
- Overdevelopment of site including greenfield development
- Inadequate local infrastructure and employment
- Impact on highway safety using rural lanes and designated National Cycle Route 41
- Poor housing sales within local area

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The site is located at Wanswell and would contribute to the provision of facilities associated with the proposed new settlement and would therefore be in accordance with the development strategy. Redevelopment of previously developed land for housing provides the opportunity to safeguard and improve existing open space on site to meet the recreational needs of the new community. Redevelopment can be accommodated without impacts on highway safety and development can connect to existing walking and cycling routes to Berkeley and the wider local area. The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation.

PS36 South and east of Newtown and Sharpness

Support comments

Support for Garden Village development, incorporating exemplar carbon neutral technologies, delivering strategic road, rail, and public transport connectivity and opportunities for growth linked to Berkeley Green UTC science and technology hub and canal related tourism.

Key issues identified:

- Impact on the Severn Estuary designated SAC, SPA and Ramsar site and national priority species will require a detailed Environmental Impact Assessment before any decision is taken as to whether land is suitable for development. The site includes two known areas of priority habitat which must be retained and expanded as part of the delivery of GI to Building with Nature standards
- Subject to sensitive phasing of new homes, infrastructure and local employment



- Will require improvements to M5 J14
- Development should deliver improved sustainable transport options, pedestrian and cycle routes including the Severn Way and Vale of Berkeley heritage railway
- Will require flood risk mitigation including the potential for managed realignment of the tidal flood defences along the Severn Estuary frontage of the site in consultation with the Severn Estuary Coastal Group
- Will need to include any required mitigation due to increased risk from increased use of Oldminster footpath level crossing
- High sewerage risk: Existing capacity not available and will require further assessment of potential for capacity improvements within existing environmental constraints and impacts from proximity to sewage treatment works

Objection comments

Key concerns identified:

- Coalescence of Berkeley, Sharpness, Wanswell and Brookend and associated rural hamlets
- Scale of development and impact on local amenity, services and facilities including secondary school provision
- Scale of proposed Phase 2 development beyond Plan period
- Combined scale of development with PS33 Northwest of Berkeley, PS34 Sharpness Docks and PS35 Land at Focus School, Wanswell and in conjunction with strategic allocations PS24 West of Draycott and PS37 New settlement at Wisloe
- Greenfield development and associated loss of agricultural land, countryside and natural habitats including wildfowl feeding grounds associated with Slimbridge WWT
- Insufficient proposed employment
- Impact on local and strategic highway network including traffic congestion and role of A38 as motorway relief road
- Car dependent development, remote from transport corridors and local and regional centres of services and employment
- Impact on highway safety using rural lanes and designated National Cycle Route 41
- Deliverability and viability concerns regarding public transport provision and proposed rail link
- Increased floodrisk
- Public safety implications from proximity to former Berkeley Power Station site and impact on operational requirements of the Nuclear Decommissioning Authority and Magnox
- Impact on Severn Estuary SAC, SPA and Ramsar site, Slimbridge WWT and protected species from new development, flood protection and increased recreational pressure
- Impact on the Sharpness Canal, Severn Way and Severn Estuary landscapes



Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that this site is appropriate for allocation in the Local Plan. The wording of the policy and supporting text seeks to address specific concerns raised during consultation.

A hybrid development strategy based upon concentrated development at our main towns and well located new settlements performs much better than dispersal options. This new settlement, developed in accordance with Garden City principles, will contribute to the District's housing and employment needs at a location which maximises the potential for residents to use active travel and public transport to access jobs, services and facilities.

The site performs relatively well in the Sustainability Appraisal against reasonable alternatives, using a range of sustainability objectives. The Habitats Regulation Assessment has identified potential impacts on Severn Estuary designations but the policy and supporting text will require substantial mitigation measures to ensure there are no significant impacts and potential benefits from allocation.

Whilst there are constraints, including flood risk, landscape and biodiversity impacts, these are capable of mitigation through layout and design measures. Infrastructure improvements relating to drainage and flood risk will also benefit existing residents within the area. The new settlement is being designed with strategic landscaping buffers, a network of multifunctional Green Infrastructure and with a strong design code to protect the separate character and identity of Berkeley, Sharpness, Wanswell, Brookend and rural hamlets. The site will have no adverse impact on the operational requirements of the Nuclear Decommissioning Authority and Magnox.

There are positive benefits related to the regeneration of the Berkeley/Sharpness area, with the new settlement complementing and supporting existing regeneration initiatives at Sharpness Docks and the former Berkeley Power Station. The development of 10 hectares of employment land will complement the growing employment opportunities at the Gloucestershire Science and Technology Park and adjacent to Sharpness Docks. Proximity to the historic market town of Berkeley will provide services and facilities for the new community in the early years and support the vitality and viability of the market town, whilst the final range of services and facilities at the new settlement will benefit existing communities, once established. There is a particular opportunity to provide passenger services on the Sharpness rail branch line.

The transport assessment work has identified a range of highway mitigation measures to ensure traffic and safety issues can be addressed and also opportunities for sustainable transport measures to provide realistic options to the use of the private car. The Infrastructure Delivery Plan has identified no major issues which cannot be addressed.

The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation. The scale of growth required in the District means that a number of strategic sites will be in delivery at the same time. The range of types of sites,



locations, different promoters and delivery mechanisms will ensure there is no market saturation.

Wisloe

PS37 Land at Wisloe

Support comments

Support for Garden Village development, incorporating exemplar carbon neutral technologies, delivering enhanced strategic public transport provision, including improvements to Cam and Dursley Station, and high quality cycling and walking links across the M5 motorway and mainline railway.

Key issues identified:

- Subject to no negative impacts on the Severn Estuary SPA and delivery of GI to Building with Nature standards
- Subject to sensitive phasing of new homes, infrastructure and local employment
- Will require improvements to M5 J14
- Opportunity to provide shuttle bus service to Slimbridge WWT
- Will need to include any required mitigation due to increased risk from increased use of the level crossings Dursley 28 Level crossing – footpath crossing and Slimbridge 46 Level Crossing.
- WWU high pressure gas pipeline will influence masterplanning of site
- Development will be required to minimise the exposure of noise-sensitive receptors to strategic traffic including a landscape buffer and acoustic bund to be located to avoid encroachment onto highway land associated with the Strategic Rail Network
- Development will require a new pumping station to pump sewage flows directly to Coaley Sewage Treatment Works. Potential high surface water drainage risk outside the scope of existing growth scheme
- Development should include tree planting to minimise the impact of development when viewed from the Cotswolds AONB and should be designed not to obscure sight of the iconic Slimbridge Church spire
- Will require archaeological evaluation

Objection comments

Key concerns identified:

- Fails to satisfy Garden Village principles or requirements
- Coalescence of Slimbridge, Cam and Gossington parishes and associated rural hamlets
- Greenfield development and associated loss of agricultural land, countryside and natural habitats including wildfowl feeding grounds associated with Slimbridge WWT
- Scale of development and impact on local amenity, services and facilities



- Insufficient proposed employment
- Overdevelopment and potential risk to deliverability due to proximity to proposed strategic allocations at PS24 West of Draycott and PS36 New settlement at Sharpness
- Impact on local and strategic highway network including traffic congestion and role of A38 as motorway relief road
- Impact on highway safety crossing A38 and using rural lanes
- WWU High pressure gas main – public safety and development capacity constraints
- Local sewage and surface water flooding and increased flood risk
- Noise and air pollution from proximity to M5 motorway and mainline railway
- Detrimental impact on the Cotswolds AONB, Cotswold Way and Severn Estuary landscapes
- Impact on Severn Estuary SAC, SPA and Ramsar site and protected species from development and increased recreational pressures
- Impact on archaeological assets

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that this site is appropriate for allocation in the Local Plan. The wording of the policy and supporting text seeks to address specific concerns raised during consultation.

A hybrid development strategy based upon concentrated development at our main towns and well located new settlements performs much better than dispersal options. This new settlement, developed in accordance with Garden City principles, will contribute to the District's housing and employment needs at a location which maximises the potential for residents to use active travel and public transport to access jobs, services and facilities.

The site performs relatively well in the Sustainability Appraisal against reasonable alternatives, using a range of sustainability objectives. The Habitats Regulation Assessment has not identified any issues or impacts on biodiversity sites which are not capable of mitigation.

Whilst there are constraints, including proximity to the M5 motorway and gas mains on-site, these are capable of mitigation through layout and design measures. Strategic landscaping buffers around the site and a strong design code will prevent physical and visual coalescence with neighbouring villages.

There are positive benefits related to proximity to Cam & Dursley station with opportunities to improve access to the station for walkers and cyclists, opportunities to link the Uley-Dursley-Cam Greenway with the Sustrans route at Slimbridge, the ability to connect to bus services along the A4135 and A38 and relative proximity to jobs, services and facilities at Cam & Dursley.

The transport assessment work has identified no major issues and opportunities for sustainable transport measures and modest highway mitigation works to address traffic and safety issues. The Infrastructure Delivery Plan has identified no major issues which cannot be addressed.



The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation. The scale of growth required in the District means that a number of strategic sites will be in delivery at the same time. The range of types of sites, locations, different promoters and delivery mechanisms will ensure there is no market saturation.



The Severn Vale

Frampton on Severn

PS44 Northwest of Whitminster Lane

Support comments

Support for small sustainable extension to existing village with opportunities to address specific local housing pressures and improved community facilities.

Key issues identified:

- Presence of overhead power lines
- Will require full ecological appraisal

Objection comments

Key concerns identified:

- Greenfield development and associated coalescence with Oatfield
- Impact on capacity of local services and facilities
- Access - potential conflict with access to doctor's surgery and playing field carpark, lack of public footpath/ cyclepath along Whitminster Lane
- Significant site constraints including overhead power lines, public footpaths, foul and surface water drainage issues

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that part of the site is appropriate for allocation in the Local Plan. The site area has been reduced to retain appropriate separation between Frampton and Oatfield, protect the rural setting of the adjacent Industrial Heritage Conservation Area and minimise the loss of agricultural land. The location of the site as a sustainable extension to Frampton on Severn, a Tier 3a settlement, is in accordance with the development strategy. Whilst there are constraints, including overhead power lines, public footpaths and the relationship with adjacent development, which will need to be addressed at the planning application stage, there are no overriding constraints preventing allocation. Consultees raised issues relating to foul and surface water drainage and appropriate community and open space provision which will be addressed at the masterplanning and planning application stages. The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation.



The Severn Vale - Whitminster

PS45 Land west of Upton's Gardens

Support comments

Support for small sustainable extension to existing village and as an opportunity for SME builders

Key issues identified:

- Will require full ecological appraisal to determine presence of priority habitat and development suitability
- Impact on heritage assets and their mature landscaped setting

Objection comments

Key concerns identified:

- Impact on sewerage/ water treatment capacity at Frampton on Severn
- Impact on the Frome Valley and associated Key Wildlife Site

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The location of the site as a small sustainable extension to Whitminster, a Tier 3a settlement, is in accordance with the development strategy. Whilst there are specific site issues, including impacts on designated heritage assets, wider landscape setting and local biodiversity, which will need to be addressed at the planning application stage, there are no overriding constraints preventing allocation. Consultees raised issues relating to foul and surface water drainage which will be addressed at the planning application stage. The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation.

PS46 Land west of School Lane

Support comments

Support for sustainable extension to existing village well related to existing development and local services and facilities.

Key issues identified:

- High or medium risk to the sewer network will require further modelling to assess scope for any sewerage capacity improvements at Frampton Sewage Treatment Works
- Will require full ecological appraisal

Objection comments



Key concerns identified:

- Impact on sewerage/ water treatment capacity at Frampton on Severn
- Impact on the Frome Valley and associated Key Wildlife Site

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The location of the site as a sustainable extension to Whitminster, a Tier 3a settlement, is in accordance with the development strategy. Whilst there are specific site issues, including public footpaths, and impacts on the wider landscape setting and local biodiversity, which will need to be addressed at the planning application stage, there are no overriding constraints preventing allocation. Consultees raised issues relating to foul and surface water drainage which will be addressed at the planning application stage. The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation.



Wotton Cluster

Kingswood

PS38 South of Wickwar Road

Support comments

Support for small scale development within Wotton Cluster with potential to address local housing needs and deliver local community benefits.

Key issues identified:

- Will require full ecological appraisal to determine presence of protected and priority species and development suitability
- Kingswood School capacity and potential for improvements, including provision of open space, alongside primary school capacity within wider planning area
- Improvements to pedestrian safety within Kingswood village and wider linkages to KLB School and Wotton under Edge
- Access onto B4060 Wickwar Road and associated local highway improvements
- Further assessment of cumulative development impacts on sewer capacity and liaison with Wessex Water required

Objection comments

Key concerns identified:

- Greenfield dormitory development
- Insufficient capacity at Kingswood School and limited capacity within wider planning area
- Future secondary school capacity at KLB School
- Distance and route for primary age pupils to access schools in Wotton Under Edge
- Lack of suitable, safe, sustainable transport choices to access primary schools and other local services and facilities in Wotton Under Edge
- Impact on traffic and parking congestion in Wotton Under Edge
- Inadequate infrastructure and local facilities to cope with additional new development
- Access and highway safety concerns within Kingswood village and wider linkages to Wotton under Edge
- Access to site and potential capacity

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The location of the site as a sustainable extension to Kingswood, a Tier 3a settlement, is in accordance with the development strategy. Consultees raised significant concerns regarding insufficient capacity at Kingswood School to cater for additional development together with wider school capacity issues and safe sustainable access to



Wotton under Edge. The Council considers that the proposed scale of development can be justified to meet Kingswood's local housing need for the Plan period, necessary to sustain the settlement's role, function and community vitality, and that moderate, planned growth will support the delivery of sustainable accessible pedestrian and cycling improvements within Kingswood and the wider local area, including the Wotton – Charfield – Kingswood Greenway. The County Council has indicated that there is existing capacity at local schools within Wotton. Whilst there are other constraints including impacts on local biodiversity, which will need to be addressed at the planning application stage, there are no overriding constraints preventing allocation. Consultees raised issues relating to access, open space and site capacity issues which will be addressed at the masterplanning and planning application stages. The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation.

PS47 Land west of Renishaw New Mills

Support comments

Support for high quality employment growth and training opportunities as an extension to the existing key employment site at Renishaw New Mills with opportunities to support delivery of the Wotton – Charfield – Kingswood Greenway and wider sustainable transport choices.

Key issues identified:

- Should be linked to highway/ sustainable transport improvement contributions to M5 Junction 14, Charfield Station and delivery of section of the Wotton – Charfield – Kingswood Greenway
- Access should provide an improved roundabout junction with the B4058 including a bus stop pick-up area
- The northern part of the site is within the flood zone and will require flood protection
- Sewerage requirements for significant length of off-site sewer or potential watercourse crossing
- Will require detailed ecological appraisal and natural habitat buffer to Marlees Brook
- Impact on Lower Barns Farm and Renishaw New Mills listed buildings should be mitigated in accordance with SALA Heritage Impact Appraisal recommendations
- Will require native planted structural landscaping to integrate development into rural location

Objection comments

Key concerns identified:

- Greenfield development and associated loss of agricultural land
- Impact on local and strategic road network at M5 Junction 14
- Visually sensitive countryside location



Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The location of the site, as an extension to an existing high value key employment site, is in accordance with the development strategy for strategic employment growth and there are no overriding constraints preventing allocation. The policy wording includes detailed requirements for the development brief to address site specific issues raised by consultees, including impacts on designated heritage assets, landscape setting and local biodiversity, together with wider requirements associated with strategic development to meet the District's needs regarding infrastructure provision, promoting transport choice and accessibility and enhancing sustainable travel opportunities for all. The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation.



The Cotswold Cluster

Painswick

PS41 Washwell Fields

Support comments

Support for additional housing in this location subject to the resolution of key issues.

Key issues identified:

- Restrictive covenant limiting developable area
- Provision of a safe and suitable access
- Will require full ecological appraisal

Objection comments

Key concerns identified:

- Greenfield development and associated loss of meadow habitat
- Deliverability concerns due to restrictive covenant
- Lower Washwell Lane unsuitable as an access to further development
- Additional traffic adding to local congestion and pedestrian/ vehicle conflict
- Increased recreational pressure on Cotswold Beechwoods SAC
- Visual impact within the Cotswolds AONB

Council's response

Having considered all consultation responses, background evidence, assessment work and reasonable alternatives, the Council considers that the site is appropriate for allocation in the Local Plan. The location of the site as a small extension to Painswick, a Tier 2 settlement, is in accordance with the development strategy. Consultees raised the principle of development within the AONB as a significant constraint, including concerns about scale, landscape impact and the existence of a restrictive deed of covenant on part of the site. However, the Council considers the points of principle can be justified, and potential impacts can be avoided, minimised and mitigated. The Council considers that the proposed scale of development can be justified as proportionate and specific to Painswick's local housing need (that is need arising from within the AONB here identified in 2020, which cannot be met elsewhere) and that moderate, planned growth is necessary to sustain the settlement's role, function and community vitality. Whilst consultees raised issues relating to ecological impacts, traffic generation, pedestrian/vehicle conflict and visual impacts, these matters can be addressed at the planning application stage and through policy wording limiting the developable area to avoid part of the site subject to the restrictive deed of covenant and establishing the need for ecological appraisal at an appropriate time of year. There are no overriding constraints preventing allocation. The site is being actively promoted and there are no known deliverability or viability matters which could prevent implementation.



Alternative sites

As part of the 2019 Draft Plan consultation, the Council asked whether people would like to promote alternative sites for consideration.

General suggestions for the location of alternative sites for allocated development to meet the District's needs for the plan period included:

- All Tier 3 and Tier 4 settlements
- Land between the A38 & M5
- East of M5 between J12 and J13
- Empty shops in cities
- Previously rejected sites assessed through the Strategic Assessment of Land Availability (SALA) process
- Brownfield sites
- Neighbourhood Plan sites
- Land south of Ebley bypass, Stonehouse

In addition, the table below lists specific sites suggested that have previously been assessed through the SALA process or potential sites (PS) previously consulted on in the Emerging Strategy consultation paper 2018. A list of suggested new sites, not previously assessed, can be viewed on the SALA page of the Council's website and have been assessed and reported on in the SALA New Sites Update Report October 2020, available on the Council's website at [www.stroud.gov.uk/strategic Assessment of Land Availability \(SALA\)](http://www.stroud.gov.uk/strategic%20Assessment%20of%20Land%20Availability%20(SALA)).

Settlement	Suggested alternatives
The Stroud Valleys	
Amberley	No alternative sites suggested
Brimscombe & Thrupp	BRI002, BRI015
Chalford	No alternative sites suggested
Horsley	No alternative sites suggested
Manor Village	No alternative sites suggested
Minchinhampton	MIN002, MIN003, MIN011, MIN016
Nailsworth	No alternative sites suggested
North Woodchester	No alternative sites suggested
Stroud	STR002, STR017, STR024, STR032, STR046
Whiteshill & Ruscombe	No alternative sites suggested
The Stonehouse Cluster	
Eastington (Alkerton)	EAS009, EAS011, EAS013, EAS014, EAS016, EAS17, EAS020
Kings Stanley	KST002/ PS15
Leonard Stanley	No alternative sites suggested
Stonehouse	STO06, STO014, STO015, STO017
Cam & Dursley	
Cam	CAM010, CAM011, CAM015, CAM016, CAM018, CAM021, CAM028, CAM024
Coaley	No alternative sites suggested

Dursley	DUR002, PS26, PS29
Uley	No alternative sites suggested
The Gloucester Fringe	
Hardwicke	HAR013, HAR014, HAR018
Haresfield	HFD005, HFD011, HFD012
Upton St Leonards	UPT012
The Berkeley Cluster	
Berkeley	BER008
Newtown & Sharpness	No alternative sites suggested
Slimbridge	No alternative sites suggested
Wisloe	CAM0015, CAM016
Severn Cluster	
Frampton on Severn	FRA001
Whitminster	WHI001, WHI002, WHI007, WHI008, WHI010
The Wotton Cluster	
Kingswood	KIN001, KIN007, KIN008, KIN013, KIN014, PS39
North Nibley	NIB004, NIB005
Wotton-under-Edge	WUE001
The Cotswold Cluster	
Bisley	No alternative sites suggested
Oakridge Lynch	No alternative sites suggested
Painswick	PAI002, PAI012, PAI013

Council's response

The principle of development at the above settlements has been assessed as part of the generation and selection of strategy options. In addition, all sites have been subject to initial assessment through the Council's Strategic Assessment of Land Availability (SALA) process. The results of this work have informed the preferred development strategy and the list of sites for allocation. Sites that are not considered suitable or available for allocation are set out in the SALA reports and the Sustainability Appraisal of alternative sites with reasons for not taking these sites forward.



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