

Matter 6 Site allocations

Issue 6 - Are the proposed housing, employment and mixed use site allocations justified, effective and consistent with national policy?

Our questions on the Council's methodology for site assessment and selection are set out under Matter 2.

The results of the site selection process are set out in various SALA reports and updates produced from 2017 to 2020 (EB19-EB26).

Matter 6a Site allocations - General questions

1. What is the purpose and status of the guiding principles for growth for each of the eight defined areas in Chapter 3 of the Plan?

6a.1.1 The wording of Core Policy CP4 requiring that development proposals shall accord with the mini visions, have regard to the guiding principles and shall be informed by other relevant documents reflects the approach set out in the adopted Local Plan for Core Policy CP4, which was supported by the Local Plan Inspector in 2015 (EB115, para. 78). The mini-visions "unpack" the District's vision for each parish cluster area and the guiding principles demonstrate how the mini-visions are to be achieved, unpacking the development strategy for each parish cluster area. They are therefore justified by the need to implement the vision and strategy locally and will be effective in delivery.

2. Within the Plan, what is the status of the maps and diagrams for each defined area and site allocation? Are the maps in the Plan accurately duplicating the policies map?

6a.2.1 The NPPF (Para. 23) suggests that broad locations for development should be indicated on a key diagram, and land-use designations and allocations should be identified on a policies map.

6a.2.2 The Council considers that Map 3 The Development Strategy (on page 24 of the Plan) and Map 4 The Spatial Vision (on page 67) should be regarded as the Plan's key diagrams. These maps use abstract polygons and symbols (which don't appear on the Policies Map) to identify broad locations for growth and development. Map 3 also accurately reproduces the individual site allocation polygons that do appear on the Policies Map, to add a sense of scale and context to the abstract broad locations.

6a.2.3 Smaller abstract diagrams appear as an accompaniment to Table 3 (p34) and Table 5 (p40), using the same broad location polygons that appear on Map 3 and Map 4 to highlight employment growth locations and housing growth locations specifically. These are illustrative, thematic 'extracts' from the key diagrams.

6a.2.4 The Council considers the eight spatial 'mini vision' diagrams that appear throughout Chapter 3 | Making Places (Maps 5-12) to be 'zoomed in' extracts from

the District-wide spatial vision (Map 4). These are for illustrative purposes and include a combination of abstract symbols and shapes, plus site allocation boundaries and settlement development limits that are drawn using the same GIS polygons that appear on the Policies Map. They are not intended to accurately duplicate the Policies Map in its entirety.

6a.2.5 The status of the site allocation policy maps within Chapter 3 | Making Places is that they form part of the allocation policy and should be read as a whole. These site allocation maps accurately duplicate the red-lined site boundaries that appear on the Policies Map, as referenced in the wording for each of the Strategic and Local Site Allocation Policies. However, these maps do not reproduce all the other information that appears on the Policies Map. The Strategic Site Allocation maps also include some additional symbols and information which is indicative of the policy requirements, as the map keys make clear, and is intended for illustrative purposes.

6a.2.6 The settlement maps that accompany each of the settlement summaries within Chapter 3 | Making Places are for illustrative purposes. They accurately duplicate the site allocation boundaries and settlement development limits that appear on the Policies Map. But they also include some information that is not on the Policies Map (such as listed buildings and locally-designated key wildlife sites) for context, to illustrate what the settlement summaries say, particularly in respect of constraints and designations.

3. Core Policy CP5 sets out environmental development principles for strategic sites.

a. How does the policy relate to the strategic site allocation policies, which specify the location of the site, the density of development and set out detailed requirements including the production of a masterplan? What are the reasons for duplicating these elements?

6a.3.1 The Council acknowledges Core Policy CP5 duplicates elements of the Strategic site allocation policies such as location, density and masterplanning. However, over the lifetime of the Local Plan to 2040 other strategic sites may come forward which may have not been identified or have been altered to overcome previously identified constraints or issues. CP5 can usefully provide a consistency of Local Plan approach in considering strategic sites should an appropriate opportunity for development arise that was not already identified.

6a.3.2 Core Policies sit within the Development Strategy for the Local Plan. The strategy indicates broad principles about acceptable levels of development in both towns and countryside in the future and creates a policy framework for development management decisions to be made as required by paragraph 17 of the NPPF.. The specific allocation policies usefully show the applicant as to what issues must and remain to be resolved particular to that location. This may not negate future opportunities for development arising. The application of CP5 could facilitate these opportunities to be taken and give a degree of consistency in approach so

that the Local Plan can create places, homes and workplaces that positively influence peoples lives.

- b. How does the policy relate to other Plan policies e.g. Core Policies DCP1 and CP14 and Delivery Policies ES1, ES2 and ES3? What are the reasons for any duplication and is this justified?

6a.3.3 The relationship with other policies is explained at Paragraphs 1.02 – 1.04 (inclusive) of the submitted Local Plan where broadly the development strategy is articulated through a number of core policies and more detailed delivery policies manage and direct development. The NPPF paragraph 19 recognises that the development plan for an area comprises the combination of strategic and nonstrategic policies. Paragraph 28 recognises that non-strategic policies should set out more detailed policies for specific areas, neighbourhoods or types of development including establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies. The Local Plan should be read as a whole and the relationship of the policies to the strategic objectives is also provided.

- c. How will the requirements A-H in the policy be measured and how will a decision-maker know if the required statement accords with the requirements? What are the benchmarks for assessment?
- d. Is it clear that the policy applies to all strategic sites set out in the Plan? Are all the requirements relevant to residential and employment strategic sites and are they justified and viable?
- e. Is the policy and supporting text clear on what a Construction Environmental Management Plan would contain and how will a decision-maker determine when this would need to be produced? Is this approach justified?
- f. Overall, is the policy consistent with the Framework and is it clear how it relates to national planning guidance including the National Design Guide and National Model Design Code?

Answers c-f combined

6a.3.4 The Council considers the requirements set out in Policy CP5 (including the need to support strategic proposals with an indicative masterplan, a statement of sustainable construction techniques and a design code) are justified and consistent with national policy – in particular paragraphs 17, 37, 38, 57, 58, 59, 66 of the NPPF; as well as 93-98, which urge local authorities to adopt proactive strategies and ‘local requirements’ to aid decision-makers in assessing development proposals’ sustainability credentials. One of the fundamental principles of development plans is to actively manage patterns of growth (NPPF, paragraph 17) and masterplans design statements and other mechanisms are important tools to ensure policies can be implemented effectively.

- 6a.3.5 The Council considers that requiring developers of the strategic sites identified in CP2 to produce an indicative masterplan is certainly not unduly onerous; rather it is essential to enable the Council (and affected communities) to gauge the scale, character and likely impact of proposals, in accordance with NPPF paragraph 66.
- 6a.3.6 Indeed, many (if not all) of the proposed strategic site allocations will already have been subject to some form of indicative masterplanning exercise. The policy retains flexibility so, for example, an indicative masterplan can be agreed at the preapplication stage or submitted with a planning application.
- 6a.3.7 Another Pre-Submission criticism was that the policy wording is too general and unnecessarily repeats criteria set out more succinctly elsewhere in the Plan. Some suggested that Core Policies CP4 and CP5 might be combined into a single policy, addressing general design and sustainability considerations; while others pointed to the individual site allocation policies as the most appropriate place for them.
- 6a.3.8 The Council considers that, whilst the criteria and requirements contained in CP5 are justified, reasonable and necessary for strategic development, it would not always be appropriate to apply them to all types and scales of development: to do that might indeed adversely affect deliverability and viability.

4. Site allocations that include housing development specify dwelling capacity figures.

- a. Is it clear how these have been determined for each site allocation? Are they based on the suggested yields from the SALA, or have they been updated to take account of more recent developer evidence or detailed assessments?

6a.4.1 The yields of site allocations started off based on the suggested yields set out in the SALA, but then amended where necessary in cases where further studies suggested amendments to address site constraints or infrastructure requirements or where promoters carried out more detailed masterplanning work or where changes to the boundaries during the plan making process have required a review of yields. In addition, at the Additional Housing Consultation Reg.18 stage in 2021, the Council reviewed the strategic site allocation housing capacities in the light of the SA work which identified making the most effective use of land at existing allocations performed well.

- b. Is the scale of housing for each site allocation justified having regard to any constraints and the provision of necessary additional infrastructure?

6a.4.2 The scale of housing has taken account of constraints and infrastructure requirements as well as the need to make effective use of land and to reflect the nature of the location of that allocation.

- c. Do the site allocations achieve appropriate densities and make effective use of land, in accordance with the Framework?

6a.4.3 The sites make the most effective use of land whilst taking account of locational characteristics. All strategic sites have average yields of over 30 dwellings per hectare (net), although neighbourhoods within those allocations will include a range of densities, depending whether they are close to services and facilities or on an urban edge.

- d. What are the reasons for using different terms for setting out the number of dwellings within each policy, such as 'comprising', 'comprising up to' and 'comprising approximately'? Is there a particular explanation as to why some sites are restricted by an 'up to' number and is this approach consistent with national policy?

6a.4.4 Where evidence suggests a site has an environmental capacity (for example, landscape, character and setting) or policy capacity (for example Site PS05 at Minchinhampton in the context of what constitutes major development in the AONB), the policy includes the term "up to". Generally, the strategic site allocations use the term "approximately" to reflect the scope for variation within large sites and to support flexibility.

- e. Overall, is the development density and capacity for each individual site justified?

6a.4.5 The Council considers the SDLP will deliver yields and densities which make the most efficient use of land whilst seeking to ensure sites reflect local constraints, the capacity of infrastructure and that they maintain or achieve an effective settlement character to deliver well-designed, attractive and healthy places (NPPF, para. 124).

- 5. Many of the site allocations propose a mix of development but only the number of dwellings is specified. Where other uses such as employment are also sought, why is the size of that other use (i.e. floorspace or land area) not also specified? How will a decision-maker determine if a future development proposal meets the policy and identified needs, if the requirements are not clearly defined?

6a.5.1 Where the number of houses and the amount of employment land is expected to deliver the strategic growth requirements set out in Core Policy CP2, the allocation policy specifies the amount of housing and/or employment to be delivered. Where other complementary or ancillary uses are to be provided, the allocation policy or other delivery policies will either specify a size based on infrastructure levels determined through the IDP process (for example the size of primary school) or the size will be determined by standards set out in other policies of the Plan (for example, open space standards).

6a.5.2 In cases where these matters are not set out in the SDLP, the precise quantum and mix on site of ancillary uses is a matter to be determined during the development management process, having regard to place-making principles and more detailed assessments of site requirements. The Council considers prescribing quanta for every ancillary land use is not appropriate for the level of detail required within a local plan allocation policy.

6. As regards the assessment of development impacting on the landscape and scenic beauty of the AONB, we note the Council's document on Development in the Cotswolds AONB dated May 2021 (EB39). This seeks to assist in justifying the two site allocations for housing development in the AONB (Policy PS05 and Policy PS41). Whilst our questions on these specific sites are set out below, we have the following general queries about the assessment of development impacts on the AONB:

- a. Are the conclusions set out in EB39 justified and consistent with national policy?
- b. Have all relevant impacts on the AONB from proposed development in the Plan, including sites not within the AONB, been suitably assessed?
- c. How does the Plan's approach relate to the AONB Management Plan?
- d. Are the site allocations impacting on the AONB justified and is this clearly set out in the Plan?

6a.6.1 At the Draft Local Plan stage (November 2019) the Cotswolds Conservation Board asked the Council to undertake an assessment of major development considerations for the proposed AONB allocations before any of these sites were taken forward (Rep.487). The Board recommended an assessment that South Downs National Park Authority undertook for their potential site allocations in October 2015.

6a.6.2 As a result, the Council undertook an assessment (EB39) using the same approach as carried out by the South Downs National Park Authority. The assessment looked at how to assess compliance with national policy requirements as set out in paragraph 172 of the NPPF (now paragraphs 176 and 177) including whether the proposed sites could be regarded as major development and whether they could be justified by evidence of local need. The document took account of relevant evidence developed during the preparation of the SDLP. Section 3 of document EB39 sets out the methodology used and section 4 (and Appendix A) sets out the findings.

6a.6.3 The Council considers the conclusions of the document EB39 are justified by the evidence and the approach taken is consistent with national policy. The Role and Function Studies (EB71 and EB72) and referenced Local Needs Surveys demonstrate a clear case for some limited development within the AONB settlements of Minchinhampton and Painswick whilst the landscape and related

biodiversity and heritage assessments demonstrate that development could be accommodated with suitable mitigation.

- 6a.6.3 Following the publication of the assessment (EB39), the Conservation Board withdrew their objections to the remaining sites proposed to be allocated within the AONB at the Regulation 19 Pre-Submission stage (CD5a, Rep. 688). Their representation states in relation to the Painswick site PS41 “The site allocation contributes to meeting local housing needs without adversely affecting the natural beauty of the Cotswolds Area of Outstanding Natural Beauty”. In relation to the Minchinhampton site PS05, the representation states, in its conclusions that “we consider that Stroud District Council has provided sufficient evidence and proposed sufficient mitigation for the allocation to be legally compliant and sound. We therefore withdraw our previous objection and, in effect, support the allocation.”
- 6a.6.4 All locations around Tier 1-Tier 3 settlements were subject to landscape sensitivity assessment through the preparation of the Stroud District Landscape Sensitivity Assessment (EB36) in 2016 and potential Local Plan sites were assessed having regard to the results of this assessment work and incorporated within the Strategic Assessment of Land Availability (SALA) assessments (2017-2020). This landscape assessment work took account of previous Cotswolds AONB landscape assessment work. In addition, the SALA process included appropriate ecological and heritage assessment work. The wider Assessment of Strategic Development Opportunities in Parts of Gloucestershire (EB17) included consultation with the Cotswolds Conservation Board during the finalisation of the landscape sensitivity assessment methodology.
- 6a.6.5 Following the Emerging Strategy stage in 2019, further landscape assessment work was carried out on those sites either within or within the setting of the Cotswolds AONB. The Council worked with the Cotswolds Conservation Board and Natural England to scope out the assessment work that needed to be done and to review the findings. The process is set out within the Topic Paper – Assessment & selection of sites (EB9) (paragraphs 2.4.4-2.4.7). The results of the Evaluation of Site Landscape and Visual Issues (EB38) informed the selection of sites at the Draft Local Plan stage.
- 6a.6.6 In summary, the Council considers it has properly assessed all sites set out in the SDLP and taken account of landscape matters in the drafting of their policies. The Council has had regard to the Cotswolds AONB Management Plan and its policies (EB119, including CE10 and CE12) in determining the policies and proposals in the SDLP and explicitly references the Management Plan as a material consideration in paragraph 6.58 of the SDLP. The Council has worked constructively with the Conservation Board during the plan making process to resolve outstanding matters.

7. Which sites are located on the best and most versatile agricultural land and is the loss justified?

- 6a.7.1 The strategic allocations at Cam North West (PS24), Wisloe (PS37) and Javelin Park (PS43) contain areas within them classified as best and most versatile land.
- 6a.7.2 The NPPF states that Plans should “allocate land with the least environmental or amenity value, where consistent with other policies in this Framework” (paragraph 175). Within this context, “where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality” (footnote 58).
- 6a.7.3 All potential sites have been assessed through the SALA process and the sustainability appraisal process, which have looked at their suitability having regard to a range of environmental and amenity factors, as required by the NPPF.
- 6a.7.4 Whilst the Council has looked at the potential for development on sites located on land of poorer quality land, other factors including landscape, heritage and biodiversity must be considered at least of comparable importance. There is no priority given to agricultural land quality matters over other environmental factors in the NPPF.
- 6a.7.5 In correspondence with the Council, Natural England made clear that selecting lesser graded ALC sites should be subject to other material considerations and that selection would rarely rely solely on ALC/BMV considerations.
- 6a.7.6 Having considered the suitability of all sites, against a range of policy requirements, the Council considers that the development of a limited number of sites identified to contain best and most versatile agricultural land is justified by the need for development and for the distribution of growth to reflect the locational qualities of these identified sites:
- Cam North West represents one of the most sustainable extensions to Cam - a Tier 1 settlement;
 - Wisloe is a well located new settlement given its proximity to Cam and access to public transport and active travel corridors;
 - Javelin Park is a key commercial market location for employment uses within the District.
- 6a.7.7 Natural England has not objected to the allocation of any of these sites and has confirmed that safeguarding soils can be achieved on site through good design and a soil management plan, or can be exported elsewhere to enable their conservation as a last resort.
8. Does the Plan clearly identify which site allocations are within the SAC, SPA and Ramsar core catchment zones and have suitable assessments been carried out to identify any impacts and appropriate mitigation measures where necessary?
- 6a.8.1 The Local Plan does identify which site allocations are within the SAC, SPA and Ramsar core catchment zones. The allocation policies/supporting text make

reference to their location within a core catchment zone where appropriate and the need to address SAC, SPA and Ramsar biodiversity issues. Furthermore the Council's GIS mapping identifies the SAC/SPA and Ramsar core catchment extents should any query arise.

6a.8.2 HRA Screening identified likely significant effects alone for example with the Severn Estuary SAC/SPA/Ramsar as a result of allocations PS34 and PS36 (within the Berkeley Cluster), these are both large allocations adjacent to the European site. Likely significant effects were also identified as a result of the cumulative level of growth within the Plan within 15.4km of the Cotswolds Beechwoods SAC, within 3.9km of Rodborough Common SAC and within 7.7km of the Severn Estuary SAC/SPA/Ramsar. These distances reflect the distance bands used in existing mitigation schemes (the 7.7km for the Severn Estuary SAC/SPA/Ramsar) or recent visitor survey data and distance within which 75% of visitors had originated.

6a.8.3 Existing strategic approaches to address recreation impacts are in place for Rodborough Common SAC and for the Severn Estuary SAC/SPA/Ramsar and have been running for a number of years. The relevant Mitigation Strategies are published and have been agreed with Natural England. These identify the impacts, potential impact pathways and the appropriate mitigation measures. Existing strategic approaches to address recreation impacts are in place for Rodborough Common SAC and for the Severn Estuary SAC/SPA/Ramsar and have been running for a number of years. These have provided an established means to address the cumulative impacts from recreation and are cross-referenced within the Plan. The Cotswold Beechwoods Mitigation Strategy was adopted in October 2023 and will start to provide a means to address cumulative impacts from recreation. This enables the Council to be confident that adverse effects on integrity, alone or in combination, can be ruled out as they deliver sufficient mitigation to address the scale of growth in the Local Plan for Rodborough Common SAC and for the Severn Estuary SAC/SPA/Ramsar.

9. Some of the site allocation policies require the provision of 'accessible natural green space' and 'outdoor playing space' and either on-site sports facilities or contributions to off-site facilities, all to be 'in accordance with local standards'.

a. What are these local standards, are they based on up-to-date assessments of need, and do they form part of the Plan?

6a.9.1 The local standards referred to in the site allocation policies link with New Delivery Policy DHC7 – Provision of new open space and built and indoor sports facilities. This does form part of the Local Plan and the policy was drafted in response to The Council's Open Space, Green Infrastructure, Sport and Recreation Study (2019) (EB41, EB41a- j, EB42, EB43, EB43 a- s) that provided in our evidence base. It is a comprehensive audit of recreation provision across the District. Having regard to existing provision, local views through surveys and stakeholder engagement and national best practice, this major up to date study has recommended defining new local minimum standards for play, recreation space and built and indoor sports facilities and incorporating these within the Local Plan.

The Study has used the Local Plan's 'parish clusters' set out in Chapter 3 to assess provision across the District. In summary the study work identifies new quantity, quality and accessibility minimum standards of provision for the District. Many areas of the District are currently deficient against these standards. New residential development will add to the demand for recreation facilities in an area and needs to be provided in step with new housing.

b. Is the approach to use 'local standards' in this context, consistent with paragraph 98 of the Framework?

6a.9.2 The Council believes the approach is consistent with paragraph 98 of the NPPF. Paragraph 98 states policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. More people than ever before are participating in both organised and informal recreation activities and there is an increasing awareness of the importance recreation facilities play in the life of the community. In accordance with paragraph 98 the Council will clearly have regard to the Open Space, Green Infrastructure, Sport and Recreation Study data and delivery policy DHC7 when determining whether development proposals which may affect existing open space and built and indoor sports facilities are acceptable. In this way the information gained from the assessments will be used to determine what open space, sport and recreational provision is needed with a development.

10. What amendments are necessary to reflect the latest Use Classes Order?

6a.10.1 The Council reviewed the changes to the Use Classes Order which came into force on 21 April 2021. The principal change made to the SDLP at pre-submission stage was to remove references to B1, replacing with references to "offices" and to review the retail policy framework, with particular reference to Class E. Having made changes to the SDLP at pre-submission stage the Council considers it has made all of the necessary changes required. The Council is happy to consider any further changes which the Inspectors feel need to be made to reflect the latest Use Classes Order.

11. The Local Site Allocation Policies include an open list of 'particular issues to address' but these are mostly generic in nature. Limited site-specific details are provided of what is required from development. Paragraph 16 of the Framework identifies that policies should be 'clearly written and unambiguous, so it is evident how a decision-maker should react to proposals' and should 'serve a clear purpose, avoiding unnecessary duplication of policies'.

a. Whilst we set out our specific questions for each site allocation below, we would like to understand why the policies are written so generally, whether the duplication of any policy wording is justified, and how this approach accords with the above national policy?

- 6a.11.1 The approach of the SDLP is for matters of broad policy and principle to be set out within Core Policies and for more specific policy to be provided through the various Delivery Policies set out in the SDLP. In this case, the Site Allocation Policies contain strategic requirements or signpost to consider the more detailed matters which are covered elsewhere in the Delivery Policies. This is not considered ambiguous when the SDLP is read as a whole, and the Council considers this meets the requirements of Paragraph 16 of the Framework.
- 6a.11.2 The Council does not consider there is any duplication between the Site Allocation Policies and the more detailed Delivery Policies and the SDLP is sound in this regard.

- b. Is there sufficient detail in the supporting text to clarify what is required or should this be included in the policy?

The Council considers there is sufficient clarity in the individual Site Allocation Policies supporting text when read in conjunction with the Detailed Delivery Policies. Including further details in the Site Allocation Policies in addition to the supporting text and Delivery Policies would add unnecessary duplication.

12. Can the Council confirm which sites in the Plan have been allocated in a previous plan and explain why these sites have not been successfully delivered? Do the same reasons exist now, and if so, why does the Council consider the sites will be delivered during this plan period?

- 6a.12.1 The following sites were allocated in the adopted Stroud District Local Plan (2015). All of these sites are being actively progressed and significant progress has been made but have yet to receive planning permission. They will form an important part of the future housing supply in the District and should be confirmed in the new SDLP:

1. Brimscombe Mill (PS01) – The ownership of the site has changed since 2015 and the two new owners are now working together to bring the site forward in a co-ordinated manner.
2. Brimscombe Port (PS02) – The District Council has spent time de-risking the site and getting funding for and permission in place for the enabling infrastructure. The Council has now appointed St. Modwen to be the developer of the site. The developer is currently consulting the community on the plans and a planning application is expected in 2023.
3. Hunts Grove Extension (PS30) – The developers of the wider Hunts Grove development have been busy building out many of the housing phases and establishing the main access into the site since 2015. This extension is the final stage and pre-application discussions have been held. There are no reasons why this final stage will not come forward.

4. Sharpness Docks (PS34) – A planning application is expected to be approved by the Spring 2023. A Statement of Common Ground with the Canal & River Trust sets out progress with the scheme and their continuing commitment to delivering the site.

13. The site allocation policies refer to the production of masterplans and/or development briefs but no further details are set out.
 - a. Does the Plan clearly define what masterplans and development briefs are required to be informed by and what they need to include? Is this set out in policy?
 - b. Is it appropriate for every site allocation to require a masterplan and/or development brief, particularly the smaller sites? Is this justified and proportionate to the scale of development?
 - c. Is the process by which the masterplans and development briefs would be approved by the Council, clearly defined in the Plan? How long would this process take? Are they to be approved before decisions on planning applications are made? If so, what impact, if any, would this have on site delivery timescales?
 - d. Has the proposed delivery of each site taken appropriate account of the timescales for producing and approving masterplans and development briefs, particularly for those sites to be delivered during the first five years from adoption, and the larger or more complex sites?

6a.13.1 The NPPF makes clear that masterplans have a role in ensuring land is used efficiently and developments make optimal potential of the site to meet the needs of different groups and to secure a design vision for the site (see NPPF, paragraphs 73 (c), 125, design code in glossary).

6a.13.2 National planning practice guidance emphasises the role masterplans can play at a strategic policies level, in taking forward the key design requirements set out in strategic policies (Paragraph: 003 Reference ID: 26-003-20191001) and in setting out more detailed design principles where non-strategic policies provide a policy hook (Paragraph: 004 Reference ID: 26-004-20191001).

6a.13.3 Consequently the SDLP sets out in strategic and non-strategic allocations a requirement for a masterplan to detail the way in which land uses and infrastructure will be developed in an integrated and co-ordinated manner. It is for developers to produce these masterplans, having regard to the detailed policy requirements set out within the respective strategic allocation policies, any identified local specific issues to address and the wider objectives established through the NPPF and planning practice guidance.

6a.13.4 In most cases, it is expected that a masterplan drafted by the developer will be approved by the District Council at the planning application stage. There are therefore no implications on timescales, as there is already an expectation that

pre-application consultations with local communities have informed site proposals and that a concept masterplan is provided together with a planning statement at the application stage.

6a.13.5 The SDLP does not prescribe the exact format and scope of the necessary masterplan/development brief and therefore it is for the developer and the local planning authority to ensure the document is proportionate to the scale of development at the planning application stage. Both development briefs and masterplans are broadly defined in the Glossary to the SDLP (CD1, Appendix E) to guide prospective developers and decision makers.

14. Has an appropriate lead-in time and delivery rate been used when determining the delivery timeframe for each site (whether residential, employment or mixed use) and is this realistic?

6a.14.1 The site selection process for allocations in the draft Plan has been informed by the Strategic Assessment of Land Availability (SALA) including assessment of the achievability of sites and the prospect of a particular type of development coming forward at a particular time.

6a.14.2 The SALA Methodology (EB18) sets out the measures for the assessment of achievability based on the latest available evidence from the local property market and the views of landowners, developers and local agents regarding lead-in times, build out rates by year and the economic viability of sites.

6a.14.3 The projected delivery of strategic and local residential and mixed-use site allocations was subsequently updated in the draft Plan to reflect evidence from site promoters with regard to site progress and local property markets and provide a realistic picture of lead-in time and delivery rates.

6a.14.4 Projected delivery rates for all strategic residential, employment and mixed use allocations have been further updated as part of the latest Statements of Common Ground (SoCG) to reflect Infrastructure Delivery Plan (IDP) requirements (EB69 & EB110), site progress and current market conditions. Site specific delivery information has also been updated by site promoters/ developers of local site allocations for residential development, as at December 2022, based on latest site progress and market conditions.

6a.14.5 The Council consider that robustly evidenced, projected delivery information from site promoters and developers constitutes an appropriate approach to lead-in times and delivery rates and provides a realistic assessment of delivery timeframes informed by latest site progress and industry understanding of current market conditions.

15. Overall, is each site allocation justified, viable and deliverable or developable (in accordance with the Framework definitions)?

- 6a.15.1 As stated above, the site selection process for allocations in the draft Plan has been informed by the Strategic Assessment of Land Availability (SALA) to provide a clear understanding of the land available in the area and to be able to identify a supply of specific deliverable and developable sites.
- 6a.15.2 The SALA Methodology (EB18) sets out the expected outputs from the assessment including the identification of sites considered 'deliverable' or 'developable' in accordance with the Framework definitions in place at the time and as subsequently updated.
- 6a.15.3 The published SALA reports set out the site assessment for each site identified as meeting the Framework definitions for 'deliverable' and 'developable' including a summary of the availability and viability evidence supporting the identification of sites as 'deliverable' or 'developable'. Appendix 2 – Deliverable and developable sites (EB19b, EB20b, EB21b & EB22b) comprises those sites also considered suitable for development in accordance with adopted Local Plan policies whilst Appendix 3 – Sites with future potential (EB19c, EB20c, EB21c & EB22c) comprises developable sites that may be considered suitable for planned growth as part of the Local Plan review.
- 6a.15.4 The Council consider that the SALA has provided a clear understanding of the land available in the District to enable the allocation of specific suitable, deliverable and developable sites, in accordance with the development strategy, and provide a supply of justified, viable and deliverable or developable sites as required by the Framework.
- 6a.15.5 The Stroud Local Plan Viability Assessment (EB70) and 2022 Refresh Report (EB110) provide further viability evidence for each strategic site allocation together with typology evidence supporting local site allocation delivery based on the latest review of market conditions.

16. Our questions about housing supply and the trajectory as a whole are under a later matter. However, to assist us in understanding the delivery timescales for each housing site allocation, we would like the Council to provide the trajectory in a single table/spreadsheet, so that we can clearly see how many dwellings each allocated site is expected to deliver in each year of the plan period.

The table/spreadsheet should include a comments column at the end summarising in bullet form the evidence to justify the delivery information it contains. This should also provide an update on the planning status of each site (for example are there pre-application discussions, is there a PPA in place, does the site have outline or full planning permission etc), and it should also summarise any existing uses or known constraints.

Moreover, if it is a previously allocated site that has not been delivered, we wish the Council to set out the reasons for this and to explain why they consider it will be built during this plan period. For completeness, the table/spreadsheet should also include completions (as a total) since the start of the plan period, the timescales for the delivery of commitments that are

uncompleted/under construction, and windfall allowances for each relevant year.

6a.16.1 The trajectory is provided at Appendix 1

NOTE: In addition to the above general site allocation questions, where we have additional specific questions for each site, these are set out below.

Our questions on the identification of safeguarded land are also included under relevant sections.

Matter 6b Stroud Valley site allocations

Local Sites Allocation Policy PS01 Brimscombe Mill

17. The site is allocated for 40 dwellings, employment uses and associated community and open space uses and enabling infrastructure.

a. What type and scale of employment use is proposed?

6b.17.1 The Site Allocation Policy needs to be read in conjunction with Core Policy CP11, which sets out the detailed delivery criteria for employment scale and use. The precise mix is a matter to be determined during the development management process, having regard to place-making principles and more detailed assessments of site requirements. The Council considers being more prescriptive is a higher level of detail than required within a local plan allocation policy and is best decided at development management stage.

b. What type and level of community and open space uses and enabling infrastructure would be required or are these covered by other policies?

6b.17.2 The site allocation policy refers to “associated community and open space uses, together with enabling infrastructure”, and then goes on to specify that development will include a restored mill pond and new or improved access from Brimscombe Hill / A419. The access is a critical piece of enabling infrastructure, without which the site cannot be comprehensively developed. The existing vehicular access to the southern part of the site will be lost once canal restoration is completed here. The policy also references the need to address flood risk, which may also involve enabling infrastructure to ensure the site is safely developable.

6b.17.3 In terms of community uses, open space and enabling infrastructure, no other specifics are set out in either the policy or supporting text. However, the Council considers Local Sites Allocation Policy PS01 has usefully signposted the developer to the issues that need to be addressed and does not consider there is a need to cover these matters in greater detail within the site allocation policy.

6b.17.4 Whilst the Council expects that the form of future development here will be guided principally through the site allocation policy, the ‘whole plan’ approach means that more specialist policies (including DHC5, DHC7, ES4, ES6, ES11, ES12, DES2) provide specific criteria in relation to accessible recreational and natural green space; other community spaces and open spaces, including play space; canal side access; flood risk management; green infrastructure, and landscaping, which must be addressed by developers and considered by decision makers.

c. Are the requirements to restore the mill pond and create a new or improved access from Brimscombe Hill/A419 justified and viable?

6b.17.5 As explained above in response to Question 17(b), the Council considers the creation of new or improved access to be a critical piece of enabling

infrastructure, without which the site cannot be comprehensively developed. The SALA assessment for site BRI008 noted that site access will require a solution that does not impact upon the planned route of the reopened canal (SALA 2017 Appendix 2 for sites BRI008 and BRI0022, EB19c).

6b.17.6 The Council considers the requirement for development to create a restored mill pond is justified for heritage, biodiversity and flooding reasons. The site allocation policy wording identifies “*conserving and enhancing heritage assets, local biodiversity and non increasing flood risk either on or off site*” amongst particular issues for development to address. The SALA Heritage Impact Appraisal 2017 (EB50, pages BRI 6 and BRI 17) identifies the mill pond as a contributor to the conservation area’s character and significance. The SFRA identified that the mill pond provides opportunities for flood risk betterment, storing flows from the River Frome during times of flood, to reduce peak flow and delay the time at which it reaches communities downstream (SFRA Appendix P: SFRA Level 2 Site summary tables, EB54q, page 16).

6b.17.7 Site viability is assessed in the EB111 Stroud Local Plan Viability Assessment 2022 Refresh.

d. Which heritage assets need to be conserved and enhanced and is the wording in the policy consistent with national policy?

6b.17.8 The policy wording states that “*Particular issues to address include conserving and enhancing heritage assets...*”. The Council considers this wording to be consistent with national policy. NPPF Chapter 16 (paragraphs 189-208) is entitled “Conserving and enhancing the historic environment” and covers diverse aspects of positive heritage asset management. National Planning Practice Guidance explains what is meant by the conservation and enhancement of the historic environment (Paragraph: 002 Reference ID: 18a-002-20190723). The Council considers the intent behind Local Sites Allocation Policy PS01 accords particularly with the advice (Paragraph: 003 Reference ID: 18a-003-20190723) that;

“...plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area.”

6b.17.9 The allocation policy does not itself specify which heritage assets need to be conserved or enhanced; nor does the policy’s supporting text (3.1.6).

6b.17.10 Whilst the Council expects that the form of future development here will be guided principally through the site allocation policy, the ‘whole plan’ approach means that more specialist policies, including ES10 (Valuing our historic environment and assets), provide specific criteria to be addressed by developers and considered by decision makers.

- 6b.17.11 ES10 supporting text (para.6.71) sets out what the Council considers to constitute a heritage asset, ranging from sites and buildings of local historic value to those of the highest significance, consistent with national policy (NPPF para. 189). ES10 Criterion 1 requires a heritage statement to be produced for any development proposals involving any one of those things, to ensure the impacts of potential development can be properly considered.
- 6b.17.12 The Council considers Local Sites Allocation Policy PS01 has usefully signposted the developer to the issues that need to be addressed.
- 6b.17.13 Scope for conservation or enhancement of heritage assets formed a key part of the Strategic Assessment of Land Availability and is evidenced for this site through the SALA Heritage Impact Appraisal 2017 (EB50, pages BRI 6 and BRI 17), which identifies the site's location within the Stroud Industrial Heritage Conservation Area (IHCA) as key. EB50 highlights key features of the site and its surroundings that contribute to the character and significance of the IHCA and advises on how these features might influence the scale, massing and design of new development.
- e. The policy states that 'local biodiversity' issues need to be addressed for this site. A list of ecological issues has been provided by the Gloucestershire Wildlife Trust, who also advise that the allocation contains part of the River Frome Local Wildlife Site. Why have these specific issues not been included in the policy or supporting text and should they be, for effectiveness?
- 6b.17.14 GWT identified the following key ecological and biodiversity issues in their representation at regulation 19 stage (summarised in Summary of Regulation 20 responses to the Pre-Submission Draft Plan (Regulation 19 Consultation) PART 1:Site Allocations, SLP-01a, page 7): waste water, maintenance and restoration of a natural channel structure, creating a substantial buffer of natural habitat between the watercourse and the development, retention of the large pooled area, minimal outside and street lighting and no lighting directed at the river.
- 6b.17.15 The Council considers the policy wording has usefully signposted the developer to the fact that conservation and enhancement of local biodiversity needs to be addressed. The supporting text for PS01 does specify that development must achieve the creation of a restored millpond (the large pooled area, referred to by GWT), which is expected to be a cornerstone of conserving and enhancing the site's biodiversity.
- 6b.17.16 The Council believe further specific requirements do not need to be set out in the site allocation policy or supporting text, as more specialist policies in the Plan provide specific criteria to be addressed by developers and considered by decision makers - principally ES6 (Providing for biodiversity and geodiversity), but also ES4, ES7 and ES8. Together these policies will effectively address waste water management, the desirability of opening up culverted watercourses to achieve ecological benefits, potential impacts on the local wildlife site, and biodiversity and habitat enhancement through landscaping and detailed site design.

- f. As design and flooding are covered by other policies is it necessary for these issues to be duplicated in this policy? Are there any specific site reasons for this?

6b.17.17 The Council considers Local Sites Allocation Policy PS01 usefully highlights particular issues that need to be considered on this site and signposts developers and decision-makers towards the Plan's more specialist policies (including CP4, CP8, HC1, CP14, ES10, ES11, ES12 and ES4) which provide specific criteria to be addressed in terms of design, place-making and flood risk management.

6b.17.18 The Council does not consider this to be duplication of the Plan's more detailed policy criteria. However, some reference to design and flooding matters is justified by the evidence base and is necessary due to site specific reasons and policy drivers within the Plan, aimed at regenerating brownfield land in the historic industrial valley bottoms and restoring the Cotswold Canals (CD1: Vision to 2040, page 19; Stroud valleys mini vision, page 70; development strategy para. 2.3.6 and 2.3.17; Key Issues 25, 37).

6b.17.19 Given the site's sensitive historic environment context (as evidenced by the SALA Heritage Impact Appraisal 2017 EB50, pages BRI 6 and BRI 17), the Council considers the specific reference in Local Sites Allocation Policy PS01 to "delivering high quality locally distinctive design" is in accordance with national Planning Practice Guidance on plan-making (Paragraph: 003 Reference ID: 18a-003-20190723): the allocation policy seeks to ensure "*...the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area.*"

6b.17.20 Flooding is similarly identified as a particular issue, specific to this site (SFRA Appendix P: SFRA Level 2 Site summary tables, EB54q, page 13), as the site is partially within Flood Zones 2 and 3. The site allocation policy requirements seek to deliver wider sustainability benefits to the community (aligned with policy drivers referred to above) that outweigh the flood risk, whilst ensuring the development will be safe for its lifetime, in accordance with national policy (NPPF para. 164). The Council's response to Matter 2 Question 29 provides more detail.

- g. The supporting text to the policy at paragraph 3.1.6 of the Plan sets out specific restrictions for the site's development relating to the adjoining Cotswold Canal and a flood risk assessment, but these are not set out in the policy. What are the reasons for this and are the restrictions justified? What impact does this have (if any) on the viability and deliverability of this site?

6b.17.21 "Not increasing flood risk either on or off site" is identified within the allocation policy as a particular issue to address. The supporting text (3.1.6) expands upon this policy requirement, pointing to the site-specific circumstances of its physical proximity to the ongoing Cotswold Canals restoration (which presents both risks and opportunities in terms of future flood management in the vicinity) and the need to demonstrate that the site can be safely developed with more vulnerable

development being located within Flood Zone 1. The wording of 3.1.6 repeats key requirements for the site as set out in the current Adopted Local Plan 2015 (EB114, supporting text paragraph 3.13).

6b.17.22 SFRA Appendix P (EB54q) contains the Level 2 SFRA detailed site summary table for PS01 and recommends that the Plan should require a site-specific flood risk assessment because the site is partially within Flood Zones 2 and 3 (EB54q, page 17). It is also noted that “... *planned canal regeneration works at Brimscombe Port will include provision of additional storage for water within the reinstated canal, as well as ground raising in areas of the site, which are proposed to manage and reduce existing flood risk to the site from the River Frome and mitigate potential effects.*”

6b.17.23 The Council therefore considers a requirement to carry out a specific Flood Risk assessment is justified and that an assessment that takes into account the actual or potential effects of nearby canal restoration is sensible.

6b.17.24 The site promoter has provided information stating that the site is available, deliverable and viable, including build-out projections as set out in the Annual trajectory December 2022 (APPENDIX 1).

h. We understand this is a previously allocated site. Why has it not been successfully developed and do those same reasons exist now?

6b.17.25 The site was allocated through the 2015 SDLP, as Stroud Valleys site SA1d Brimscombe Mill. Land ownership has been the principal barrier to the site’s development. Subsequent to the 2015 allocation, the site was subdivided, with land to the north and south of the mill pond falling into separate ownership. However, the site’s constraints (particularly access and flood risk) are such that it can only successfully be re-developed in an integrated and co-ordinated manner, requiring cooperation over the distribution of land uses and infrastructure across both halves of the site. The Council has engaged with the current landowners and we are confident that both parties are now committed to working together to generate a masterplan, and to bring the site forward as soon as possible.

6b.17.26 The site promoter has provided information stating that the site is available, deliverable and viable, including build-out projections as set out in the Annual trajectory December 2022 (APPENDIX 1)

Local Sites Allocation Policy PS02 Brimscombe Port

18. The site is allocated for 150 dwellings, canal related tourism development and employment uses and associated community and open space uses and enabling infrastructure.

a. Does the supporting text appropriately identify the scale and type of canal related tourism development envisaged for the site? Does this need to be set out in the policy?

- 6b.18.1 The Site Allocation Policy needs to be read in conjunction with Delivery Policies EI10, EI11 and ES11, which set out detailed delivery criteria for determining appropriate scale and types of tourism, leisure and cultural development, as well as for canal access and canal-side development. The Council considers duplication in the supporting text of the Site Allocation Policy unnecessary.
- 6b.18.2 The supporting text for PS02 highlights that the reinstated canal and port basin provide opportunities for canal-related facilities, visitor facilities and moorings. The precise mix is a matter to be determined during the development management process, having regard to place-making principles and more detailed assessments of site requirements. The Council considers being more prescriptive is a higher level of detail than required within a local plan allocation policy and is best decided at development management stage.

b. What type and scale of employment use is proposed?

- 6b.18.3 The Site Allocation Policy needs to be read in conjunction with Core Policy CP11, which sets out the detailed delivery criteria for employment scale and use. The precise mix is a matter to be determined during the development management process, having regard to place-making principles and more detailed assessments of site requirements. The Council considers being more prescriptive is a higher level of detail than required within a local plan allocation policy and is best decided at development management stage.

c. What type and level of community and open space uses and enabling infrastructure would be required or are these covered by other policies?

- 6b.18.4 The site allocation policy refers to “associated community and open space uses, together with enabling infrastructure”, and then goes on to specify that development will include a reinstated canal and port basin and a new access from the A419. The access is a critical piece of enabling infrastructure, without which the site cannot be comprehensively developed. The existing main vehicular access off Brimscombe Hill will be lost once canal restoration is completed here and the excavation of the canal basin will mean that access to the eastern part of the site will be restricted (this is explained in the supporting text para.3.1.7). The policy also references the need to address flood risk, which may also involve enabling infrastructure to ensure the site is safely developable.
- 6b.18.5 In terms of community uses, open space and enabling infrastructure, no other specifics are set out in either the policy or supporting text. However, the Council considers Local Sites Allocation Policy PS02 has usefully signposted the developer to the issues that need to be addressed and does not consider there is a need to cover these matters in greater detail within the site allocation policy.
- 6b.18.6 Whilst the Council expects that the form of future development here will be guided principally through the site allocation policy, the ‘whole plan’ approach means that more specialist policies (including DHC5, DHC7, ES4, ES6, ES11, ES12, DES2) provide specific criteria in relation to accessible recreational and natural green space; other community spaces and open spaces, including play space; canal

side access; flood risk management; green infrastructure, and landscaping, which must be addressed by developers and considered by decision makers.

d. Which heritage assets need to be 'conserved and enhanced' and is the wording in the policy consistent with national policy?

6b.18.7 The policy wording states that *"Particular issues to address include conserving and enhancing heritage assets..."*. The Council considers this wording to be consistent with national policy. NPPF Chapter 16 (paragraphs 189-208) is entitled "Conserving and enhancing the historic environment" and covers diverse aspects of positive heritage asset management. National Planning Practice Guidance explains what is meant by the conservation and enhancement of the historic environment (Paragraph: 002 Reference ID: 18a-002-20190723). The Council considers the intent behind Local Sites Allocation Policy PS01 accords particularly with the advice (Paragraph: 003 Reference ID: 18a-003-20190723) that;

"...plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area."

6b.18.8 The allocation policy does not itself specify which heritage assets need to be conserved or enhanced; nor does the policy's supporting text (3.1.6).

6b.18.9 Whilst the Council expects that the form of future development here will be guided principally through the site allocation policy, the 'whole plan' approach means that more specialist policies, including ES10 (Valuing our historic environment and assets), provide specific criteria to be addressed by developers and considered by decision makers.

6b.18.10 ES10 supporting text (para.6.71) sets out what the Council considers to constitute a heritage asset, ranging from sites and buildings of local historic value to those of the highest significance, consistent with national policy (NPPF para. 189). ES10 Criterion 1 requires a heritage statement to be produced for any development proposals involving any one of those things, to ensure the impacts of potential development can be properly considered.

6b.18.11 The Council considers Local Sites Allocation Policy PS02 has usefully signposted the developer to the issues that need to be addressed.

6b.18.12 Scope for conservation or enhancement of heritage assets formed a key part of the Strategic Assessment of Land Availability and is evidenced for this site through the SALA Heritage Impact Appraisal 2017 (EB50, page BRI 7), which identifies the following assets as key:

- The site's location within the Stroud Industrial Heritage Conservation Area (IHCA)

- The presence of Grade II listed buildings on site: Port Mill, the salt warehouse and the port walls
- The site affects the setting of multiple listed buildings at neighbouring Bourne Mill (the Grade II* wool stove and Grade II Bourne Mill, Small Mill, canal bridge) and buildings on Port Lane and Brimscombe Hill (White House / Terrace House, Cleeve House, Corner Cottage / Brentwood / Cleevedale and some lesser impact on the Wesleyan Methodist Chapel)
- Archaeological potential associated with the former port, foundry and mill.

6b.18.13 EB50 identifies that there are *“Potentially very positive heritage benefits from redevelopment, including valuable opportunities to enhance the character and appearance of the conservation area and to better reveal and interpret this site’s great historic significance – particularly through the reinstatement of the canal channel and the excavation of the former port area”*. EB50 highlights key features of the site and its surroundings that contribute to the character and significance of the IHCA and other heritage assets identified and advises on how these features might influence the scale, massing and design of new development.

- e. The policy states that development will include a reinstated canal and port basin and a new access from the A419. Are these requirements justified, viable and deliverable?

6b.18.14 As explained above in response to Question 18(c), the Council considers the creation of new access to be a critical piece of enabling infrastructure, without which the site cannot be comprehensively developed. The SALA assessment for site BRI009 noted that new access to the A419 at the eastern end of the site would improve site accessibility (SALA 2017 Appendix 2 for site BRI009, EB19c).

6b.18.15 The Council considers the requirement for development to reinstate the canal and port basin is justified for heritage and flooding reasons and would bring wider community benefits for Brimscombe and the District as a whole. Restoration of the Cotswold Canals is a strategic priority for Stroud District Council. Development focused around the reinstatement of this unique historic port reflects key policy drivers within the Plan, aimed at regenerating brownfield land in the historic industrial valley bottoms and restoring the Cotswold Canals (CD1: Vision to 2040, page 19; Stroud valleys mini vision, page 70; development strategy para. 2.3.6 and 2.3.17; Key Issues 25, 37).

6b.18.16 The site allocation policy wording identifies *“conserving and enhancing heritage assets, local biodiversity and non increasing flood risk either on or off site”* amongst particular issues for development to address. The SALA Heritage Impact Appraisal 2017 (EB50, page BRI 7) identifies the reinstatement of the canal channel and excavation of the former port area as *“valuable opportunities to enhance the character and appearance of the conservation area and to better reveal and interpret this site’s great historic significance”*.

6b.18.17 The SFRA identified that the site provides opportunities for storing water from the River Frome and the Thames and Severn Canal during times of flood and that *“...proposals to reinstate the canal and create a new online basin are likely to*

increase the capacity for conveying flow within the canal” (SFRA Appendix P: SFRA Level 2 Site summary tables, EB54q, page 22).

6b.18.18 The site allocation policy requirements seek to deliver wider sustainability benefits to the community (aligned with policy drivers referred to above) that outweigh the flood risk, whilst ensuring the development will be safe for its lifetime, in accordance with national policy (NPPF para. 164). The Council’s response to Matter 2 Question 29 provides more detail.

6b.18.19 Site viability is assessed in the Stroud Local Plan Viability Assessment 2022 Refresh Report (August 2022) (EB111). The Council has spent time de-risking the site and getting funding for and permission in place for the enabling infrastructure and is confident that the site is available, deliverable and viable, as set out in the Annual trajectory December 2022 (Appendix 1).

6b.18.20 Due to the high infrastructure costs, the scheme requires public funding. The Council has secured (and will match fund) £2m from Homes England. A further £776k of grant funding has been secured through One Public Estate for the Land Release Fund. Planning approval for the infrastructure design including the new access road from the A419, the reinstatement of the canal, basin and road and bridge works and demolition of the buildings was granted on the 24 March 2021. The Council has now appointed St. Modwen to be the developer of the site. The developer is currently consulting the community on the plans and a planning application is expected in 2023.

f. The policy states that ‘local biodiversity’ issues need to be addressed for this site. The allocation also contains part of the River Frome Local Wildlife Site. Why have specific biodiversity issues not been included in the policy or supporting text and should they be, for effectiveness?

6b.18.21 The Council considers the policy wording has usefully signposted the developer to the fact that conservation and enhancement of local biodiversity needs to be addressed.

6b.18.22 The Council believe further specific requirements do not need to be set out in the site allocation policy or supporting text, as more specialist policies in the Plan provide specific criteria to be addressed by developers and considered by decision makers - principally ES6 (Providing for biodiversity and geodiversity), but also ES7 and ES8. Together these policies will effectively address biodiversity and habitat enhancement and will ensure that potential impacts on the local wildlife site are properly considered.

g. As design and flooding are covered by other policies is it necessary for these issues to be duplicated in this policy? Are there any specific site reasons for this?

6b.18.23 The Council considers Local Sites Allocation Policy PS02 usefully highlights particular issues that need to be considered on this site and signposts developers and decision-makers towards the Plan’s more specialist policies (including CP4,

CP8, HC1, CP14, ES10, ES11, ES12 and ES4) which provide specific criteria to be addressed in terms of design, place-making and flood risk management.

- 6b.18.24 The Council does not consider this to be duplication of the Plan's more detailed policy criteria. However, some reference to design and flooding matters is justified by the evidence base and necessary due to site specific reasons and policy drivers within the Plan, aimed at regenerating brownfield land in the historic industrial valley bottoms and restoring the Cotswold Canals (CD1: Vision to 2040, page 19; Stroud valleys mini vision, page 70; development strategy para. 2.3.6 and 2.3.17; Key Issues 25, 37).
- 6b.18.25 Given the site's sensitive historic environment context (as evidenced by the SALA Heritage Impact Appraisal 2017 EB50, page BRI 7), the Council considers the specific reference in Local Sites Allocation Policy PS01 to "delivering high quality locally distinctive design" is in accordance with national Planning Practice Guidance on plan-making (Paragraph: 003 Reference ID: 18a-003-20190723): the allocation policy seeks to ensure "...*the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area.*"
- 6b.18.26 Flooding is similarly identified as a particular issue, specific to this site (SFRA Appendix P: SFRA Level 2 Site summary tables, EB54q, page 13), as the majority of the site lies within Flood Zone 3. The site allocation policy requirements seek to deliver wider sustainability benefits to the community (aligned with policy drivers referred to above) that outweigh the flood risk, whilst ensuring the development will be safe for its lifetime, in accordance with national policy (NPPF para. 164). The Council's response to Matter 2 Question 29 provides more detail.

h. Has an appropriate lead-in time and delivery rate been used when determining the delivery timeframe for the site in the housing trajectory and is this realistic?

- 6b.18.27 The Council has done work to determine lead time and delivery rate. The site is available, deliverable and viable, as set out in the Annual trajectory December 2022 (Appendix 1) and the Council has now appointed St. Modwen to be the developer of the site. The developer is currently consulting the community on the plans and a planning application is expected in 2023.

Local Sites Allocation Policy PS05 East of Tobacconist Road

19. The site is allocated for up to 80 dwellings and associated community and open space uses and strategic landscaping.

a. As regards the site's location within the AONB our queries are as follows:

i. Has its allocation within the AONB been robustly justified?

ii. Is this suitably recognised within the policy including the policy requirements?

- 6b.19.1 The Council considers that the allocation of land here, for the specified scale, type and mix of development, is justified as part of the Plan's strategic approach to meeting development needs arising from within the AONB. The Cotswolds AONB covers almost half of the District's total land area and this is a key policy driver for the Plan's development strategy.
- 6b.19.2 Paragraph 2.3.13 (part of Chapter 2.3 | Introduction to the development strategy) states that in order to *"support the social wellbeing of AONB communities, the strategy supports limited housing development to meet needs arising from within the AONB"*. This strategic approach is to be effected through two targeted Local Sites Allocations (PS05 at Minchinhampton and PS41 at Painswick) plus a small number of other Plan policies and individual criteria within them. This approach is explained in greater detail in response to Matter 2 Question 25.
- 6b.19.3 Justification for the role of both Minchinhampton and Painswick in the development strategy and the allocation of sites PS05 and PS41 to meet identified local needs arising from within the AONB is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4). In particular, EB39 explains the Council's process for assessing whether development of these two sites could be regarded as major development in the AONB and whether they could be justified by evidence of local housing need.
- 6b.19.4 As Tier 2 Local Service Centres, Minchinhampton and Painswick are the highest functioning AONB settlements within Stroud District and have (in the words of Core Policy CP3) *"the ability to support sustainable patterns of living in the District, because of the facilities, services and employment opportunities they each offer"*. EB39 explains the Council's strategic approach to allocating sites at Tier 2 settlements within the AONB, in order to meet identified housing needs arising solely from within the AONB. EB39 sets out why the Council considers this approach to accord with paragraphs 176 and 177 of the NPPF, with National Planning Practice Guidance and with the Cotswolds Conservation Board's AONB Management Plan 2018-2023 (EB119).
- 6b.19.5 The policy wording for both site allocations PS05 and PS41 specifies *"affordable housing will be for those with a local connection to address local housing needs within the AONB"*; and Core Policy CP9 (Affordable housing) is clear that *"the Council will negotiate the tenure, size and type of affordable units on a site by site basis, having regard to housing needs, site specifics and other factors"* – the supporting text for CP9 sets out that local needs will be evidenced through Local Housing Needs Assessments and that the Council will prepare a Supplementary Planning Document to provide detail of how the policy will be implemented.
- 6b.19.6 The site allocation policies for PS05 and PS41 do not specify that market housing on these sites will meet needs arising from within the AONB. That is, however, the

Council's expectation – as the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39, paragraphs 4.12 – 4.14) explains.

6b.19.7 In addition to limiting the scale of development and specifying that affordable housing must address local needs within the AONB, the Local Sites Allocation Policy identifies a number of issues to be specifically addressed:

- Minimising landscape impacts within the Cotswolds AONB
- Conserving and enhancing heritage assets and local biodiversity
- Delivering high quality locally distinctive design
- Incorporating the existing PROW within landscaped open space

6b.19.8 The supporting text provides further detail of the requirements to ensure development takes account of heritage impacts and the role that the site can play in enhancing the settlement edge through strategic landscaping and locally distinctive design. The Council considers that these requirements suitably recognise the requirement for great weight to be given to the conservation and enhancement of the AONB and will ensure that the scale and extent of development within it is limited, in accordance with NPPF paragraph 176. The strategy will meet proven needs, whilst avoiding the need for major development in accordance with paragraph 177.

6b.19.9 The Council has provided further detail about its approach to allocating development within the AONB in response to Matter 6 Question 6.

iii. How will a decision-maker determine that 'landscape impacts within the Cotswolds AONB' will be minimised when determining future applications for the site?

6b.19.10 Following the Emerging Strategy stage in 2019, the Council worked with the Cotswolds Conservation Board and Natural England to agree the scope for and review the findings of specific landscape assessment work in relation to potential sites either within or within the setting of the Cotswolds AONB. The process is set out within the Topic Paper – Assessment & selection of sites (EB9) (paragraphs 2.4.4-2.4.7). The results of the Evaluation of Site Landscape and Visual Issues (EB38) informed the selection of sites at the Draft Local Plan stage, including this site, and the formulation of policy requirements.

6b.19.11 Whilst the Council expects that the form of future development here will be guided principally through the site allocation policy, the 'whole plan' approach means that more specialist policies, particularly Delivery Policy ES7 (Landscape character), provide specific criteria in relation to landscaping, massing and design, which must be addressed by developers and considered by decision makers.

6b.19.12 The Council considers the framework of criteria contained within the allocation Policy and supporting text, together with other Plan policies (including Delivery Policy ES7) will ensure that landscape impacts within the AONB will be properly considered.

- iv. Is the Council's conclusion that the site does not constitute major development, in the context of paragraph 177 of the Framework, justified?

6b.19.13 The NPPF makes clear that:

“For the purposes of paragraphs 176 and 177, whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined”. (NPPF footnote 60 to paragraph 177).

6b.19.14 Determining whether or not development is ‘major’ within an AONB is a matter of judgement, based on the circumstances of the case – there is no set definition. The national definition of major development (as set out in Annex 2 to the NPPF) does not apply within an AONB.

6b.19.15 The Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) explains how the Council has concluded that development of this site (for the specified scale, type and mix of development), does not constitute major development within the AONB.

6b.19.16 At the Draft Local Plan stage (November 2019) the Cotswolds Conservation Board (CCB) asked the Council to undertake an assessment of major development considerations for the proposed AONB allocations before any of these sites were taken forward (Rep.487). As a result, the Council undertook an assessment (EB39) (using the same approach as carried out by the South Downs National Park Authority in 2015, as recommended by the CCB).

6b.19.17 The assessment looked at how to assess compliance with national policy requirements as set out in paragraph 172 of the NPPF (now paragraphs 176 and 177) including whether the proposed sites could be regarded as major development and whether they could be justified by evidence of local need. The document took account of relevant evidence developed during the Local Plan Review. Section 3 of document EB39 sets out the methodology used and section 4 (and Appendix A) sets out the findings.

6b.19.18 The Council considers the conclusions of the document EB39 are justified by the evidence and the approach taken is consistent with national policy. The Settlement Role and Function Studies (EB71 and EB72) and referenced Local Needs Surveys demonstrate a clear case for some limited development within the AONB settlements of Minchinhampton and Painswick, whilst the landscape and related biodiversity and heritage assessments demonstrate that development could be accommodated with suitable mitigation.

6b.19.19 Following the publication of the assessment (EB39), the Conservation Board withdrew their objections to the remaining sites proposed to be allocated within the AONB at the Regulation 19 Pre-Submission stage (CD5a, Rep. 688). Their representation states that “we consider that Stroud District Council has provided sufficient evidence and proposed sufficient mitigation for the allocation [of PS05] to be legally compliant and sound. We therefore withdraw our previous objection and, in effect, support the allocation.”

- b. Evidence appears to identify that the site is also located within the Rodborough Common SAC and Cotswold Beechwoods SAC core catchment zones and the Severn Estuary SAC, SPA and Ramsar core catchment zone, but this is not clearly set out in the policy or supporting text. Representations have also been made regarding impacts of the site's development on Minchinhampton Common SSSI designation.
 - i. Can the Council please confirm which designations and catchment zones are relevant to this site allocation and clarify how these have influenced the policy approach in the Plan and any policy requirements?
 - ii. Is the approach justified, effective and consistent with national policy and if not, what modifications would be necessary to make the Plan sound in this regard?

- 6b.19.20 The site does not lie within or directly adjoining a designated area. Minchinhampton Common SSSI lies some 1000m to the west (the other side of the Minchinhampton settlement) and Rodborough Common SAC and SSSI lies more than 2km away to the northwest, at its nearest point.
- 6b.19.21 The site does lie within the core catchment zones for the Rodborough Common SAC, the Cotswolds Beechwoods SAC and the Severn Estuary SAC, SPA and Ramsar, as do many of the Plan's other site allocations (the only site allocations unaffected by one or more of the SAC / SPA / Ramsar core catchment zones are located in the Wotton Cluster and the south of the Cam & Dursley Cluster).
- 6b.19.22 The core catchment zones have been defined to reflect patterns of recreational activity on these designated sites. Development proposals within these core catchment zones are required to contribute towards mitigation measures to address any resultant increase in recreational pressures, either individually or cumulatively (delivery policy ES6). The Plan's approach to the use of mitigation strategies to address recreational pressures on the District's SACs, SPA and Ramsar sites is explained in response to Matter 6a Question 8 and Matter 10c Question 28. The relevant Mitigation Strategies are published and have been agreed with Natural England. This enables the Council to be confident that adverse effects on integrity, alone or in combination, can be ruled out as they deliver sufficient mitigation to address the scale of growth in the Local Plan.
- 6b.19.23 The catchment zones are not specifically referenced by the policy wording or supporting text for PS05, but the catchment zones are shown on the Plan's Policies Map. Whilst the Council expects that the form of future development here will be guided principally through the site allocation policy, the 'whole plan' approach means that more specialist policies, including ES6 (Providing for biodiversity and geodiversity), provide specific criteria to be addressed by developers and considered by decision makers.
- 6b.19.24 PS05 does identify "conserving and enhancing ... local biodiversity" amongst a small number of particular issues for development to address. The Council considers this a necessary on-site requirement (in terms of design and

landscaping) and a useful signpost to the detailed requirements set out in ES6, which are designed to address both on-site and off-site requirements.

- 6b.19.25 ES6 states that development that would adversely affect SSSIs shall not be considered sustainable development and will not be permitted.
- 6b.19.26 The Council considers the Plan's approach to addressing both on-site and off-site requirements through a combination of the site allocation policy and the more specialised delivery policy ES6 to be justified, effective and consistent with national policy.
- c. The policy seeks to incorporate the existing Public Right of Way within the landscaped open space. How much open space is sought and what other types and levels of community and open space uses and strategic landscaping would be required, or are these covered by other Plan policies? Are these justified?
- 6b.19.27 The Council considers Local Sites Allocation Policy PS05 has usefully signposted the developer to the issues that need to be addressed and does not consider there is a need to cover these matters in greater detail within the site allocation policy.
- 6b.19.28 Whilst the policy refers to the PROW and the provision of landscaped open space, community uses and strategic landscaping in general terms, the supporting text (3.1.8) provides further clarification, setting out the following development requirements and expectations:
- 6b.19.29 Development should take account of the proximity to Minchinhampton Conservation Area and the role that the site can play in enhancing the settlement edge through sensitive strategic landscaping and locally distinctive design, avoiding buildings that exceed two storeys and incorporating strategic landscaping to the south and east.
- 6b.19.30 The Council consider the identification of these particular issues and development requirements in the policy and supporting text is justified due to the site's sensitive edge-of-settlement and AONB location and its heritage and natural environment context.
- 6b.19.31 Whilst the Council expects that the form of future development here will be guided principally through the site allocation policy, the 'whole plan' approach means that more specialist policies (including HC1, DHC5, DHC7, ES6, ES12, DES2) provide specific criteria in relation to accessible recreational and natural green space, other community spaces and open spaces (such as allotments), green infrastructure, public rights of way and landscaping, which must be addressed by developers and considered by decision makers.
- d. The evidence in EB39 Appendix A includes statements that, in regard to this site, there are 'Very significant heritage constraints' and that this is 'a highly sensitive site which directly adjoins The Bulwarks designated Scheduled Ancient Monument (SAM)'. The policy only states that

heritage assets need to be 'conserved and enhanced' and provides limited further detail.

- i. What assessments have been carried out of the impact of the proposed development of the site on the significance of relevant heritage assets? How has this informed the decision to allocate the site and what are the development requirements?
- ii. Is the approach in the Plan, in this respect, justified and is the wording in the policy consistent with national policy and legislation on the historic environment?

6b.19.32 The policy wording states that “*Particular issues to address include ... conserving and enhancing heritage assets*”. The Council considers this wording to be consistent with national policy. NPPF Chapter 16 (paragraphs 189-208) is entitled “Conserving and enhancing the historic environment” and covers diverse aspects of positive heritage asset management. National Planning Practice Guidance explains what is meant by the conservation and enhancement of the historic environment (Paragraph: 002 Reference ID: 18a-002-20190723).

6b.19.33 Whilst the Council expects that the form of future development here will be guided principally through the site allocation policy, the ‘whole plan’ approach means that more specialist policies, including ES10 (Valuing our historic environment and assets), provide specific criteria to be addressed by developers and considered by decision makers.

6b.19.34 ES10 supporting text (para.6.71) sets out what the Council considers to constitute a heritage asset, including archaeological remains and ranging from sites and buildings of local historic value to those of the highest significance, consistent with national policy (NPPF para. 189). ES10 Criterion 1 requires a heritage statement to be produced for any development proposals involving any one of those things, to ensure the impacts of potential development on the significance of any affected heritage assets can be properly considered at planning application stage – including through Development Management consultation with the County archaeologist.

6b.19.35 The Council considers Local Sites Allocation Policy PS05 has usefully signposted the developer to the issues that need to be addressed. Whilst the policy refers only to “heritage assets” in general terms, the supporting text (3.1.8) provides adequate clarification, setting out the following development requirements and expectations:

- Development should take account of the proximity to Minchinhampton Conservation Area and of the role that the site can play in enhancing the settlement edge through sensitive strategic landscaping and locally distinctive design, avoiding buildings that exceed two storeys and incorporating strategic landscaping to the south and east.
- Particular care must be taken to avoid direct impacts on the adjoining “Bulwarks” Scheduled Ancient Monument, including through any new

pedestrian link to the Old Rectory Field, and to mitigate any indirect impacts on its significance.

- 6b.19.36 The Council considers this to be effective and justified guidance about what is required from the development in this context and considers that it reflects the Plan's proportionate evidence base. A rigorous site selection process (as evidenced through Topic Paper – Assessment and selection of sites, October 2021, EB9) has included assessment of potential development impacts on a range of heritage assets across Stroud District and informed the Council's choice of sites where there is scope for development to be achieved alongside the conservation or enhancement of heritage assets.
- 6b.19.37 The text in evidence document EB39 Appendix A (The Cotswolds AONB Policy Assessment of Draft Allocated Sites, May 2021) quotes directly from the Council's Strategic Assessment of Land Availability: this site was subject to the SALA Heritage Impact Appraisal 2017 (EB50, page MIN 2), which identifies the site's location immediately adjoining the Bulwarks scheduled monument (SAM) and flags up some archaeological potential due to this proximity.
- 6b.19.38 EB50 also advises on how these features might influence the layout, scale and massing of new development. It recommends that there is scope for development to be planned so that "some kind of green infrastructure or community use" could be incorporated in a way that would "conserve the site's open character could mitigate any impact on the setting of the SAM or any subsequently discovered archaeology".
- 6b.19.39 It concludes that: *"subject to archaeological investigation, the impact on the setting of the SAM is likely to influence the scale and massing of any new development, rather than to preclude any development at all"*. (EB50, page MIN 2)
- 6b.19.40 Additionally, the site promoters have provided material to demonstrate how they have addressed the issues identified in the SALA and SA and how the Plan's heritage-driven requirements have shaped the emerging proposals and indicative masterplan for the site: PS05 Heritage Note r006a (EB89e); Concept Plan (EB89b).
- 6b.19.41 The promoters' Heritage Note explains that ecology, arboriculture, landscape, archaeology and heritage reports, were produced in connection with a (subsequently withdrawn) 2015 planning application for the site (ref. S15/2567/FUL), including consultation with Historic England and Gloucestershire County Council's archaeology service* (EB89e, para. 2.1-2.2). Research undertaken to establish the archaeological potential of the site, which included a geophysical survey, has confirmed that it is highly unlikely that buried archaeological deposits that relate to the scheduled area are present within the site. (EB89e para. 2.6). The Heritage Note also recounts that consultation was previously undertaken with Historic England regarding the possibility of a pathway or footbridge across the monument to the playing fields to the west, but to date this option has not been pursued and does not form part of the outline masterplan (EB89e, para. 3.3).
- 6b.19.42 The site promoters' Heritage Note concludes:

“...the need for further investigation is noted as is the need for a sensitive layout. The assessments provided by EDP have fully investigated the impact of the development of the site for housing and have concluded, in line with the consultation responses* received from Historic England and the archaeological advisor to Stroud District Council, that the site can be developed without harm to heritage assets and specifically the Scheduled Monument.” (EB89e PS05 Heritage Note r006a, para. 4.6)

e. What design and other biodiversity issues need to be addressed or are these covered by other policies?

- 6b.19.43 The policy wording identifies conserving and enhancing local biodiversity and delivering high quality locally distinctive design amongst a small number of “*Particular issues to address*”.
- 6b.19.44 The Council considers Local Sites Allocation Policy PS05 has usefully signposted the developer to the issues that need to be addressed and does not consider there is a need to cover these matters in greater detail within the site allocation policy.
- 6b.19.45 Whilst the policy refers only to biodiversity and design in general terms, the supporting text (3.1.8) provides further clarification, setting out the following development requirements and expectations, which link to the site’s sensitive AONB, heritage and natural environment context:
- Development should take account of the proximity to Minchinhampton Conservation Area and the role that the site can play in enhancing the settlement edge through sensitive strategic landscaping and locally distinctive design, avoiding buildings that exceed two storeys and incorporating strategic landscaping to the south and east.
- 6b.19.46 Whilst the Council expects that the form of future development here will be guided principally through the site allocation policy, the ‘whole plan’ approach means that more specialist policies (including CP4, CP8, CP14, ES1, ES6, ES7, ES8 and ES10) provide specific criteria in relation to biodiversity, design and placemaking which must be addressed by developers and considered by decision makers.

f. Is the inclusion of a sustainable drainage solution justified and is it clear this is a requirement?

- 6b.19.47 The Council considers this requirement is clearly set out in the allocation policy wording, which states that “*Particular issues to address include ... delivering a sustainable drainage solution*”. Detailed matters of design will be managed through Delivery Policy ES4. The requirement is justified, following consultation with Severn Trent and the Environment Agency throughout the Local Plan Review. The council is aware of water stress in this locality

g. Is the inclusion that affordable housing will be for those with a local connection justified? How will this be determined?

6b.19.48 The Council does believe this requirement is justified, as explained in response to Question 19, above, and evidenced through the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021).

6b.19.49 The policy wording specifies that "*affordable housing will be for those with a local connection to address local housing needs within the AONB*"; and Core Policy CP9 (Affordable housing) is clear that "*the Council will negotiate the tenure, size and type of affordable units on a site by site basis, having regard to housing needs, site specifics and other factors*" – the supporting text for CP9 sets out that local needs will be evidenced through Local Housing Needs Assessments and that the Council will prepare a Supplementary Planning Document to provide detail of how the policy will be implemented.

6b.19.50 Neither Local Sites Allocation Policy PS05 nor Core Policy CP9 provides clear advice on how local connection will be determined. But delivery policy HC4 (which deals with rural exception sites and does not apply to PS05) does provide some guidance.

h. Some of the representations raise concerns about other issues affecting the site including site access, traffic, loss of grazing land and accessibility to local services and public transport. Have these and any other relevant factors been suitably assessed as part of the process to allocate this site?

6b.19.51 Topic Paper: Assessment and selection of sites (EB9) sets out in detail the site selection process at each stage of the Local Plan review and how this has been suitably informed by evidence base studies, Sustainability Appraisal (SA) and representations received through Regulation 18 and Regulation 19 public consultation on the emerging Local Plan. Consultation reports for the Pre-Submission Plan (SLP-01a) and Draft Plan 2019 (CD4d) set out the concerns highlighted by representations and detail the Council's response to the issues raised.

6b.19.52 Justification for the role and function of Minchinhampton in the district's settlement hierarchy and the allocation of an appropriate level of growth based on transport links and accessibility to a range of local facilities is set out in the Stroud District Settlement Role and Function Study 2014 (EB71), its Update 2018 (EB72) and Topic Paper: The Development Strategy (EB4).

6b.19.53 The Habitats Regulations Assessment (HRA) (EB85) identifies appropriate mitigation measures to rule out adverse impacts on internationally important wildlife sites from development of sites individually or in combination.

6b.19.54 Having considered other possible options (including the rejection of vehicular access via Tobacconist Road, following representations about pedestrian safety and town centre congestion at Emerging Strategy and Draft Plan stage, as

referenced in the Regulation 18 Draft Plan Consultation Report, April 2021, CD4d, page 141), the current proposed vehicular access is considered the best available solution. An access via the Bulwarks / Glebe estate has the benefit of linking to the Cirencester Road beyond the High Street. A pedestrian/cycle only link will be provided to Tobacconist Road for convenient access to facilities. Detailed design, including on-site specifics and any necessary off-site mitigations to ensure safety, will be agreed at the planning application stage with Gloucestershire Highways.

6b.19.55 The Council considers that other issues relating to the development of the site have been suitably assessed as part of the process to allocate this site.

- i. A number of additions to the policy have been suggested in some representations. Are any of these necessary for soundness and if so why?

6b.19.56 The Council does not consider any suggested additions are necessary for soundness.

6b.19.57 Consultation reports for the Pre-Submission Plan (SLP-01a) set out a small number of suggested changes and additions made by representors and detail the Council's response to the issues raised. Aside from modifications based on fundamental objections to the suitability of the site, the following additions and modifications were suggested:

- Expand the PS05 allocation to take in PS05a as well (or allocate PS05a in lieu). The Council maintains that the size and nature of development, as set out in Local Sites Allocation Policy PS05, is sufficient to meet current identified needs at Minchinhampton. The allocation of further land and/or allocation for a greater number of homes would not constitute sustainable development within the AONB.
- Masterplan should be required to cover both PS05 and PS05a, as well as the land connections north and south. The Council considers it would be inappropriate to require a single comprehensive masterplan for both sites, since PS05 is not allocated for development during the Plan period. Nevertheless, the Council does recognise that the effectiveness of Local Sites Allocation Policy PS05 might be improved by requiring the layout and design of the site to have regard to future potential access and links to the adjoining site, to ensure any development here does not compromise the ability to develop PS05a in the future, should it be required to meet future needs.
- The site name / description is wrong – it should be called “North East of Tobacconist Road”. The site name “East of Tobacconist Road” is a legacy from the 2018 Emerging Strategy, which included both PS05 and PS05a within a single red-lined potential allocation. The Council acknowledges that this is now a less accurate descriptor of the site's location.
- Various representations suggested alternative vehicular access points, including via Woefeldane Bottom to the Tetbury Road; via Tobacconist Road; and creating a new link road north east of the SDL to Cirencester Road. The original site access proposed by the site promoters was via Tobacconist

Road. Following public consultation (Draft Plan), this was rejected as a suitable vehicular access point and restricted to pedestrian and cycle access only. Having considered other possible options, the current proposed access (via the Glebe estate) is considered the best available solution. Detailed design, including on-site specifics and any necessary off-site mitigations to ensure safety, will be agreed at the planning application stage with Gloucestershire Highways.

6b.19.58 In addition, Minchinhampton Parish Council (rep.504) suggested a series of specific mitigation measures, which they believe should be included as requirements:

- The establishment of significant wildlife corridors and enhanced PRow.
- Tree planting to soften landscape impact and aid mental health and wellbeing.
- Any development must be fully compliant with the Minchinhampton Parish NDP.
- Inclusion of allotments on site
- Enhance recreational opportunity within the parish
- Dark skies: any new development should be conditioned to specifically exclude external floodlighting after say 11.00pm, and limit fenestration in proposals.

6b.19.59 The Council considers that all these matters will be fully addressed through the application of relevant Core and Delivery policies within the Plan as a whole (particularly CP4, CP8, CP14, HC1, DHC5, DHC7, ES1, ES6, ES7, ES8, ES12 and DES2), as well as existing development requirements set out in the allocation policy and supporting text. Development of PS05 will be required to address relevant NDP policies through masterplanning and at planning application stage.

20. The 'Safeguarded Land PS05a East of Tobacconist Road' site lies within the AONB and is identified in the Plan as being safeguarded 'with potential to meet the future housing needs of Minchinhampton, if required'. However, we are confused as to what the site's status in the Plan is, as it is not a designation or allocation set out in policy. It is not required to meet any identified needs for the Plan period and it is uncertain as to whether it would be required to meet future needs beyond 2040. Indeed, the Plan specifically states that the principle of development and its allocation will be considered at the next Local Plan Review, 'subject to evidence of local housing need and the site performing best against reasonable alternatives'.

- Why is it necessary to identify the site within this Plan, when it may or may not be required in the future and will be considered at the next Local Plan Review? As the site is not allocated within a policy, what is its status in the Plan?
- As a site located within the AONB, has the impact of its development on the landscape and scenic beauty of the AONB been robustly assessed?

c. What about any impacts on other heritage and biodiversity designations and other relevant planning factors?

- 6b.20.1 Site PS05a is not a site allocation. This land is not required in order to meet currently identified needs for the Plan period, up to 2040. Site PS05 is allocated to meet Minchinhampton's development needs for the Plan period, as explained in response to Matter 6b Question 19, in combination with modest infill within settlement development limits (CD1, supporting text paragraph 3.1.9).
- 6b.20.2 However, the Council considers it helpful to the Plan's effectiveness, particularly in the exercise of Delivery Policy HC4, to identify this land as 'safeguarded' to meet any future development needs at Minchinhampton, should specific needs be identified through the next local plan review. Policy HC4 deals with local housing need, allowing for 'exception sites' to come forward outside of settlement development limits.
- 6b.20.3 During the Plan period, the Council anticipates that permission will be sought for exception sites (and potentially other forms of speculative development) around the Minchinhampton settlement. Supporting text for PS05a explains that land to the south of allocated site PS05 has been assessed in landscape terms as the most appropriate location for future housing growth at Minchinhampton, if further greenfield land should be required in the future (CD1, para. 3.1.10). This is reflected in the Settlement Summary for Minchinhampton (CD1, page 81) which sets out that the preferred direction for housing growth in landscape terms is to the east of the settlement, and that there is no identified preferred direction of growth for employment development (due to constraints and sensitivities around the settlement).
- 6b.20.4 This 'preferred direction' is justified through the Plan's evidence base. All locations around Tier 1-Tier 3 settlements were subject to landscape sensitivity assessment through the preparation of the Stroud District Landscape Sensitivity Assessment (EB36) in 2016 and potential Local Plan sites were assessed having regard to the results of this assessment work and incorporated within the Strategic Assessment of Land Availability (SALA) assessments (2017-2020). PS05 and PS05a sit within a wider parcel of land (M06) that has been assessed to have medium sensitivity to housing development, compared to high or high/medium sensitivity in all other landscape parcels around Minchinhampton.
- 6b.20.5 In addition, the SALA process included appropriate ecological and heritage assessment work. The Council believes that the process of site assessment and selection throughout the Plan's preparation demonstrates a robust assessment of potential development impacts on the landscape and scenic beauty of the AONB, as evidenced through the Topic Paper – Assessment and Selection of Sites (EB9).
- 6b.20.6 The Council considers that the 'safeguarding' of land here, to the east of the Minchinhampton SDL, reflects the objectively assessed preferred direction of future growth and seeks to deter unsustainable alternatives. This safeguarding demonstrates that the Plan has a long term vision for the settlement, for at least the next 17 years (up to 2040), which provides direction for the delivery of development to meet future needs in this sensitive AONB context. The supporting

text does, however, acknowledge that other sites, as yet unknown, might come forward on the eastern side of the settlement and therefore acknowledges that future allocation will be “subject to evidence of local housing need and the site performing best against reasonable alternatives”.

d. What is the relationship of this site with the adjacent PS05 site allocation?

6b.20.7 The adjoining site PS05 is an independent allocation within this Plan. It does not rely upon land at PS05a for its design, layout, access or comprehensive delivery in accordance with the requirements set out in Local Sites Allocation Policy PS05. However, PS05a would rely upon the development of PS05 in order to provide site access. The Council do not consider it would be possible to develop PS05a in isolation.

6b.20.8 The allocated site PS05 Land East of Tobacconist Road comprises part of a slightly larger site that was originally promoted through the local plan review: MIN005 Land at Glebe Farm was subject to SALA assessment in 2017. The red line allocation site covers a reduced area, to better reflect the nature and scale of development that will meet Minchinhampton’s current needs (i.e. the southernmost part of the site does not form part of PS05, as evidence indicates that this would be excessive to meet current needs within the AONB). Safeguarded site PS05a comprises surplus part of MIN005.

e. Overall, how is the approach to identifying this land in the Plan for ‘safeguarding’ justified, effective and consistent with national policy?

6b.20.9 The Council intends that allocating PS05 and ‘safeguarding’ this land at PS05a will together serve to achieve long term sustainable development at Minchinhampton, within the AONB, without compromising the ability to meet future needs. In this regard, the approach accords with the overarching objective of national policy, as set out in the NPPF (paragraphs 1-9). The development strategy for Minchinhampton provides a positive vision for the future and a framework for addressing housing needs and other economic, social and environmental priorities, for the Plan period and beyond (NPPF para. 15).

6b.20.10 The Council considers safeguarding in this instance to be an effective mechanism to ensure land that has been identified as having future potential for sustainable development can be protected from conflicting development, and to ensure that this potential is taken into consideration when assessing other less sustainable alternatives.

Local Sites Allocation Policy PS06 The New Lawn, Nailsworth

21. The site is allocated for approximately 90 dwellings and associated community and open space uses and enabling infrastructure.

- a. The site's delivery is subject to the relocation of Forest Green football club and the retention or relocation of associated community uses. What progress has been made on this?

6b.21.1 The relocation of Forest Green Rovers Football Club (FGRFC) is at an advanced stage. In summary a relocation site has been secured and a planning application for the Club's new stadium and associated facilities has been submitted and approved by the Council. The relocation site also features as allocation PS20 of the Local Plan, the location and content of which has been through extensive consultation which has provided the Council with sufficient confidence to approve FGRFC's initial planning applications.

6b.21.2 The intention of the promoter is to relocate the Stadium and consolidate the Club's training facilities to a single location at M5 Junction 13, (which is allocated for this purpose under site allocation PS20 of the SDLPR), as well as employment land and other ancillary uses. This will provide the Club with a ground which is more accessible to the District, where it will have the ability to consolidate its activities, grow the sport and its community function, future proof the Club and ensure that it has a healthy and sustainable future. The Club has improved its stature both within the community and within the football league and its relocation is essential for FGRFC's continued growth and development.

6b.21.3 Planning permission has been granted for the stadium as well as training pitches on the PS20 allocated site at M5 Junction 13. Specific applications of relevance are as follows:

- Outline planning permission was granted for *'a 5000-capacity football stadium and other ancillary uses (use Class D2); one full-sized grass pitch and one full-sized all weather pitch and a goal practice area (use class D2); car parking for cars and coaches and highway improvements to the A419 including a signalised site junction and combined cycle/footway'* at Land at M5 Junction 13. Zaha Hadid Architects and a full consultant team has been instructed and are currently preparing the Reserved Matters for submission this Summer, which includes detailed design of the Stadium.
- Outline Planning Permission was submitted in January 2022 (reference S.22/0206/OUT) for the *'proposed Eco-Park development comprising a 5,000 capacity football stadium, indoor and outdoor playing pitches, an Academy building, up to 37,700 sq.metres of Class E offices and 18,000 sq. metres of B2/B8 employment floorspace with up to 2,750 sq. metres of ancillary Class E food/retail/creche, a hotel with up to 100 beds, a Care Village including a 70 bed Care Home, as well as associated access, parking, landscaping and other ancillary works'*. This application is pending consideration.
- Planning permission was also granted in May 2021 for *'the change of use of land and Dutch barn from agricultural to D2 to allow for two football training pitches, with associated access, parking, landscaping and other ancillary works'* (S.20/1256/FUL) in respect of the southern parcel of the site east of the M5. A revised application for these pitches was also permitted in April 2022 which amended the location of the training pitches (S.21/1739/FUL). The

conditions on this planning permission were subsequently discharged in September 2022 (S.22/1068/DISCON), and work on the archaeological investigation has begun on site. A further application has been submitted to relocate the parking area associated with the approved training pitches, which is pending consideration (S.22/1952/FUL).

6b.21.4 The promoter states that they are confident on the delivery of a new stadium for FGRFC in a timely manner, which will free up the site at New Lawn for housing in line with the allocation and within the plan period. The Club anticipate that their new facilities will be completed in 3-5 years.

6b.21.5 The redevelopment of the New Lawn site for housing is dependent on the Club's relocation and they will remain in situ until the new premises has been completed.

b. Particular issues to address, as set out in the policy, include 'enhancing local biodiversity and enhancing the landscape on this AONB edge of Nailsworth'. What are these issues, what will be required from development on this site and should they be set out in the policy?

6b.21.6 It is vital that all stages of sustainable development are informed by relevant ecological and landscape information. The Council has a range of documents and information sources to help understand and inform key considerations on a site.

6b.21.7 The Local Plan comprises strategic and local policies. The strategic policies provide a broad context and direction, whilst the local policies add detail to that locality. In this case, policies CP14 (strategic), ES6, ES7 and ES8 are relevant. It is considered that biodiversity and landscape do not need to be explicitly set out in this policy but instead, the Plan should be read in full.

6b.21.8 In addition to the Council's comments, the promoter has provided the following commentary:

The New Lawn Site has been the subject of 2 planning applications. Firstly, application reference S.17/0850/OUT was submitted for *'the demolition of The New Lawn Football Stadium (Forest Green Rovers FC) and re-development to provide the erection of up to 95 dwellings, up to 0.11 hectares of community uses (which may include D1/D2/A3/B1 uses), landscaping, open space, associated access, parking and infrastructure.'* This was withdrawn in November 2017, whilst discussions progressed on the new Stadium application. This application was resubmitted in April 2018 (application reference S.18/0815/OUT for 95 dwellings), and this application is awaiting determination by Stroud District Council.

6b.21.9 For the above applications, a suite of technical documentation was prepared and submitted. These reports conclude that the site is well located to the existing local services, free of technical constraints, and can be effectively integrated with the existing built form and surrounding countryside. As part of the original application submission, an illustrative masterplan was prepared which shows how 95 dwellings could be accommodated on the site. This Masterplan has been submitted with the representations prepared on behalf of Ecotricity Group Ltd to the Draft Plan Consultation, dated 20th January 2020.

6b.21.10 Regarding the landscape constraints, the site contains a number of mature trees and hedgerows around the periphery of the site which were assessed within the Arboricultural Report submitted with the application. The site can be developed for housing whilst ensuring no removal of any mature trees. If any limited removal of hedgerows or scrub does take place then these can be more than compensated for by a suitable landscaping scheme. In respect of trees, the Council's Arboricultural Officer raised no objection to the above application.

6b.21.11 The Landscape Visual Impact Assessment submitted with the application also highlighted that there would not be an impact on the openness or setting of the surrounding landscape. Given the existing use of the site, the LVIA concluded that there will be a neutral to slight beneficial impact on landscape fabric and landscape character. It also recognised that there will be no significant effects or harm to the Cotswold Area of Outstanding Natural Beauty (AONB) and, in certain instances, enhanced at a localised level. Key mitigation and enhancement measures proposed as part of the application included:

- Retention of existing landscape features including existing shrub and tree vegetation to the boundaries of the Site (including species rich hedgerow to the western side);
- New tree and shrub planting to further reinforce existing levels of vegetation;
- Replacement of the larger block form of the stadium and hardstanding areas with a more varied pattern of buildings interspersed with gardens, planting and multi-functional spaces;
- Reduction in the maximum height of the proposed development, to reflect nearby existing buildings. This form of development would be considerably lower than some vertical elements on the site at present (e.g. floodlights);
- Whilst footpaths adjacent to the Site would not be affected directly by the development of the site, proposed landscape improvement to the Site boundary areas, adjacent to the paths (including improved accessibility) could provide a physical and visual enhancement;
- Creation of publicly accessible open space and species rich/biodiverse areas would provide enhancement of and connection with GI networks across the Site and beyond;
- Features within the immediate surroundings such as the adjacent woodland that is characteristic of the Cotswolds AONB would remain unaffected by the development of the site.

6b.21.12 In terms of biodiversity, an Ecology Survey was undertaken as part of the above application which concludes that the redevelopment of the site for housing will have no significant effect on statutory designated sites, particularly Rodborough Common SAC. The main ecological receptors on site were the historic hedgerow along the western boundary combined with a verge of species-rich grassland, and protected species identified in that area were slow worms, bats, birds and badgers. The retention and enhancement of this area, as well as the creation of new habitat along the other boundaries of the site, will ensure that biodiversity of

the site can be protected and enhanced. Specific mitigation measures during the construction phase would also ensure that impact on protected species is minimised.

- 6b.21.13 The promoter considers issues identified within the policy can be appropriately addressed through the masterplanning of the site in response to site constraints.
- c. The supporting text states that the 'historic hedgerow along the western boundary and the semi natural grassland parcels should be retained with no adverse impacts on adjacent wildlife sites'. Should these specific requirements be set out in policy and are they justified?
- 6b.21.14 The Council believe specific requirements do not need to be set out in Local Site Allocation policy as this matter will be resolved through Delivery Policy ES6, ES7 and ES8 considerations. The Council has usefully signposted the developer to the issues that need to be addressed.
- 6b.21.15 In addition to the Council's comments, the promoter has provided the following commentary:
- 6b.21.16 The masterplan prepared as part of the above application looks to retain the historic hedgerow. This matter can be appropriately addressed through the masterplanning of the site in response to site constraints. It is not considered that this needs to be explicitly set out in policy as these issues are covered by other policies of the Plan (namely Core Policies CP5 and CP14 and Delivery Policy ES6); however, no objection is raised if the Inspector's feel it is appropriate to add in.
- d. Some of the representations raise concerns about other issues relating to the development of the site, including congestion and road access. Have such factors been suitably assessed as part of the process to allocate this site?
- 6b.21.17 The Council considers that other issues relating to the development of the site have been suitably assessed as part of the process to allocate this site.
- 6b.21.18 Topic Paper: Assessment and selection of sites topic paper (EB9) sets out in detail the site selection process at each stage of the Local Plan review and how this has been suitably informed by evidence base studies, Sustainability Appraisal (SA) and representations received through Regulation 18 and Regulation 19 public consultation on the emerging Local Plan.
- 6b.21.19 Consultation reports for the Pre-Submission Plan (SLP-01a) and Draft Plan 2019 (CD4d) set out the concerns highlighted by representations and detail the Council's response to the issues raised.
- 6b.21.20 Further justification for the role and function of Nailsworth in the district's settlement hierarchy and the appropriate level of growth based on transport links

and accessibility to a range of local facilities is set out in the Stroud District Settlement Role and Function Study 2014 (EB71), its Update 2018 (EB72) and Topic Paper: The Development Strategy (EB4).

6b.21.21 In addition to the this, the promoter has provided the following commentary:

6b.21.22 As part of the application on the site, a Transport Assessment was prepared by PFA Consulting which considers highway safety, trip generation and junction modelling. Whilst the Transport Assessment noted that there would be a reduction in traffic movements on match days, for the purposes of robustly assessing the application, only the non-match days have been used to understand traffic conditions. GCC raised no objection to the application stating:

'The National Planning Policy Framework (NPPF) states at paragraph 109 that "development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe". The Highway Authority considers that this development will not have a severe impact on the local highway network. The NPPF also states that "safe and suitable access to the site can be achieved for all users", "appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location", and that "any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree". It is considered that the development proposals will meet these criteria. The Highway Authority recommends that no highway objection be raised subject to the following conditions being attached to any permission granted.'

6b.21.23 As such, the factors identified above are considered to be acceptable and there are no issues in respect of congestion, access or other highways related matters.

Local Sites Allocation Policy PS10 Cheapside, Stroud

22. The site is allocated for approximately 75 dwellings and town centre uses.

a. Does the policy clearly set out what type and level of town centre uses would be required and are they justified?

6b.22.1 The Site allocation Policy PS10 should be read as a whole with other policies. Town centre uses will be located according to the Retail Hierarchy as set out in CP12.

6b.22.2 This is justified through The Stroud Town Centres and Retailing Study 2010, as amended by the Retail Study Update 2013 and Retail/ Town Centre Planning Policy Advice 2021, identifies and assesses the higher levels of this hierarchy and this is reflected in Core Policy CP12. The hierarchy reflects the scale, nature and role of the centres and their importance within the retail and leisure offer in the District.

- b. The development proposes to include an improved bus/rail interchange, improved access to the station and the retention and improvement of community uses around the Brunel Goods Shed. Are these requirements justified and are they viable?

6b.22.3 PS10 forms part of the One Public Estate (OPE) programme. The Council has entered into a 12-month Memorandum of Understanding with Network Rail (NR) and London Continental Railways (LCR), who are a government owned body, with the remit of exploring mixed used development around the railway network. This site is within the red line boundary of exploration and would enable a comprehensive master plan to be prepared for the whole area. The site was purchased by the Council in December 2022.

6b.22.4 There is an agreement in principle from Network Rail to dispose of The Brunel Goods Shed, currently leased for community uses, and the land adjacent to it and outside Brunel Mall car park to the Council to facilitate the wider regeneration plans for this area.

6b.22.5 The site also falls within Zonal Policy 3 of the Stroud Neighbourhood Development Plan (NDP) which supports improved access between the station and town centre, as well as mixed use development across the site.

- c. The policy requires the Town Centre Conservation Area to be addressed. What is actually required from the development in this context and is the wording in the policy consistent with national policy? Does this requirement duplicate other Plan policies?

6b.22.6 The policy wording states that “*Particular issues to address include location within the Town Centre Conservation Area...*”. The Council acknowledges that other local sites allocation policies have referred more broadly to “*Particular issues to address include conserving and enhancing heritage assets...*”, which might be a more consistent reflection of national policy (the NPPF’s use of the term “Conserving and enhancing the historic environment” covers diverse aspects of positive heritage asset management).

6b.22.7 However, the Council does not consider the specific identification of the site’s location within a conservation area to be inconsistent with national policy – although the site actually falls partly within the Stroud Industrial Heritage Conservation Area (IHCA) and partly within Stroud Station Conservation Area, so a factual correction would be appropriate.

6b.22.8 The Council considers the intent behind Local Sites Allocation Policy PS10 accords particularly with the advice in National Planning Practice Guidance (Paragraph: 003 Reference ID: 18a-003-20190723) that;

“...plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or

reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area.”

- 6b.22.9 Whilst the Council expects that the form of future development here will be guided principally through the site allocation policy, the ‘whole ‘plan’ approach means that more specialist policies, including ES10 (Valuing our historic environment and assets) and others dealing with design and placemaking, provide specific criteria to be addressed by developers and considered by decision makers.
- 6b.22.10 The Council considers Local Sites Allocation Policy PS10 has usefully signposted the developer to the issues that need to be addressed and is not an unnecessary duplication of other Plan policies.
- 6b.22.11 The allocation policy refers to the site’s conservation area status and highlights the listed Brunel Goods Shed, another significant heritage asset. The supporting text (3.1.12) requires the retention and enhancement of the Brunel Goods Shed by providing better access and public open space. The importance of the station as a gateway to the town (including the Town Centre conservation area and the Stroud Station conservation area) is also highlighted in the supporting text, which requires high quality urban design around the station, taking into account the surrounding heritage assets, such as the (unlisted) Hill Paul building, the listed station buildings and the listed goods shed.
- 6b.22.12 The Council considers this to be effective and justified guidance about what is required from the development in this context and considers that it reflects the Plan’s evidence base. Scope for conservation or enhancement of heritage assets formed a key part of the Strategic Assessment of Land Availability and is evidenced for this site through the SALA Heritage Impact Appraisal 2017 (EB50, page STR 13), which identifies the site’s location within the Stroud Industrial Heritage Conservation Area (IHCA) and the Stroud Station CA and the presence of the Grade II* listed Goods Shed on site as key, as well as the site’s potential to affect the setting and significance of other listed buildings nearby. EB50 identifies that there are *“potentially positive heritage benefits from redevelopment, including opportunities to secure the long term future of the listed Goods Shed and to enhance the character, appearance and significance of the conservation area(s)”*.
- 6b.22.13 EB50 highlights key features of the site and its surroundings that contribute to the character and significance of the conservation areas and other heritage assets identified and advises on how these features might influence the layout, scale and massing of new development.

- d. The policy also seeks ‘the provision of a sufficient level and quality of public parking’.
- i. How is this to be determined and is it justified by robust evidence? Where is the evidence to confirm the necessity for public car parking in this location (for instance, is there a town centre car parking strategy)?

6b.22.14 Policy EI12 sets out Parking Standards Vehicular and cycle parking standards and principles for new development should be provided in accordance with adopted standards, as set out in Appendix C of this Local Plan. This includes a requirement for the developer to justify their own car parking provision with evidence accompanying any planning application. Evidence will need to demonstrate that the level would not have a detrimental impact on the local road network.

6b.22.15 London Continental Railway (LCR) will also be completing a Parking Strategy by August 2023 which will provide further evidence of the role that the site will play in Strouds town centre parking provision.

- ii. If it is unclear how much public parking is required within the site, how can the Council be sure that the other development proposed, is viable and achievable?

6b.22.16 Policy EI12 sets out Parking Standards Vehicular and cycle parking standards and principles for new development should be provided in accordance with adopted standards, as set out in Appendix C of this Local Plan. This includes a requirement for the developer to justify their own car parking provision with evidence accompanying any planning application. Evidence will need to demonstrate that the level would not have a detrimental impact on the local road network.

6b.22.17 This site is being proposed by the Council and it has carried out its own assessment and considers the site to be viable and achievable.

6b.22.18 London Continental Railway (LCR) will also be completing a Parking Strategy by August 2023 which will provide further evidence of the role that the site will play in Strouds town centre parking provision.

- e. Some of the representations raise concerns about other issues relating to the development of the site, including the adjacent Stroudwater Canal Local Wildlife Site and access links. Have such factors been suitably assessed as part of the process to allocate this site?

6b.22.19 The Site allocation Policy PS10 should be read as a whole with other policies. Development will be in accordance with Delivery Policy ES6 which requires development proposals to:

"...provide a minimum of 10% net gain in biodiversity through enhancement and creation of ecological networks within and connecting with those beyond the district by:

1. *Incorporating and enhancing existing and creating new biodiversity features within their design; and*
2. *Maximising opportunities to enhance and create links between ecological networks and habitats of principal importance. Links should be created both on-site and, where possible, with nearby features; and*

3. *Biodiversity within a development needs to be managed, monitored and maintained; and*
4. *Development proposals within, or in close proximity to, an ecological network corridor should enhance the functionality and connectivity of the corridor. Development that would impact on the strategic ecological network causing fragmentation or otherwise prejudice its effectiveness will not be permitted."*

6b.22.20 The site also forms part of a wider development area incorporating an adjacent site on the canal known as Bath Place, and recently acquired by the Council. This site has previously been approved for residential development prior to the Council's acquisition and included an Ecological Impact Assessment (Appendix #) as part of the application (Application number: S.20/0684/FUL).

Local Sites Allocation Policy PS11 Merrywalks Arches, Stroud

23. The site is allocated for 25 dwellings and town centre uses.
 - a. Does the policy clearly set out what type and level of town centre uses would be required and are they justified?

6b.23.1 The Site allocation Policy PS10 should be read as a whole with other policies. Town centre uses will be located according to the Retail Hierarchy as set out in CP12.

6b.23.2 This is justified through The Stroud Town Centres and Retailing Study 2010, as amended by the Retail Study Update 2013 and Retail/ Town Centre Planning Policy Advice 2021, identifies and assesses the higher levels of this hierarchy and this is reflected in Core Policy CP12. The hierarchy reflects the scale, nature and role of the centres and their importance within the retail and leisure offer in the District.

- b. Development is to be centred around the re-use of the local heritage asset. The site is located within the Industrial Heritage Conservation Area and the policy requires conserving and enhancing heritage assets. What is actually required from the development in heritage terms and is the wording in the policy consistent with national policy? Do these requirements duplicate other Plan policies?

6b.23.3 The policy wording states that "*Particular issues to address include location within the Industrial Heritage Conservation Area [and] conserving and enhancing heritage assets...*". The Council considers this wording to be consistent with national policy. NPPF Chapter 16 (paragraphs 189-208) is entitled "Conserving and enhancing the historic environment" and covers diverse aspects of positive heritage asset management. National Planning Practice Guidance explains what is meant by the conservation and enhancement of the historic environment (Paragraph: 002 Reference ID: 18a-002-20190723). The Council considers the intent behind Local Sites Allocation Policy PS11 accords particularly with the advice (Paragraph: 003 Reference ID: 18a-003-20190723) that;

“...plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area.”

- 6b.23.4 Whilst the Council expects that the form of future development here will be guided principally through the site allocation policy, the ‘whole ‘plan’ approach means that more specialist policies, including ES10 (Valuing our historic environment and assets), provide specific criteria to be addressed by developers and considered by decision makers.
- 6b.23.5 ES10 supporting text (para.6.71) sets out what the Council considers to constitute a heritage asset, ranging from sites and buildings of local historic value to those of the highest significance, consistent with national policy (NPPF para. 189). ES10 Criterion 1 requires a heritage statement to be produced for any development proposals involving any one of those things, to ensure the impacts of potential development can be properly considered.
- 6b.23.6 The Council considers Local Sites Allocation Policy PS10 has usefully signposted the developer to the issues that need to be addressed and is not an unnecessary duplication of other Plan policies.
- 6b.23.7 The allocation policy refers to the site’s conservation area status and the supporting text highlights the former brewery building as a local heritage asset. The supporting text (3.1.13) requires the re-use of the brewery building and a focus on “complimenting adjacent heritage assets”, enhancing the role of the site as a town centre ‘gateway’, by creating an attractive frontage.
- 6b.23.8 The Council considers this to be effective and justified guidance about what is required from the development in this context and considers that it reflects the Plan’s evidence base. Scope for conservation or enhancement of heritage assets formed a key part of the Strategic Assessment of Land Availability and is evidenced for this site through the SALA Heritage Impact Appraisal 2017 (EB50, page STR 14), which identifies the site’s location within the Stroud Industrial Heritage Conservation Area (IHCA) and its proximity and potential impact on the setting of both the Town Centre CA and Stroud Station CA as key, as well as the site’s potential to affect the setting and significance of listed buildings nearby. EB50 identifies that there are *“potentially positive heritage benefits from redevelopment, including opportunities to enhance the character, appearance and urban grain of the conservation area. Scope for redevelopment and infill, incorporating the re-use of the historic brewery building”*. EB50 highlights key features of the site and its surroundings that contribute to the character and significance of the conservation areas and other heritage assets identified and advises on how these features might influence the layout, scale and massing of new development.
- c. The policy states that the ‘feasibility of opening a pedestrian route between the site and Rowcroft should be considered’, but it is unclear what this wording actually means as the policy does not specifically

require a feasibility study to be produced. Can the Council clarify what it is they are expecting developers to deliver and explain why this is justified?

6b.23.9 PS11 is within Zonal Policy ZP4a of the Stroud NDP. The policy refers to supporting development on the site which “*allows for the route from Merrywalks to the lower end of Rowcroft via the railway arches to be re-opened*”. At this point it is unclear whether this is feasible in terms of land ownership, however it is recognised that opening the route would improve town centre connectivity between Merrywalks and the station.

d. The policy also requires other issues to be addressed including flooding and engineering issues with the sloping nature of the site. What is actually required from the development in these terms, are the requirements justified and effective, or do they duplicate other Plan policies?

6b.23.10 It is acknowledged that these issues are covered by Delivery Policy ES4 *Water courses, quality and flood risk*. Appendix P SFRA 2 sets out all mitigation required to address flood risk. The wording for this policy can therefore be amended.

Local Sites Allocation Policy PS12 Police Station / Magistrate’s Court, Stroud

24. The Plan states that the site forms part of an ‘important gateway into the town’ and on which are located the ‘current Police Station and former Magistrate’s Court’. It is proposed to be redeveloped for up to 45 dwellings and town centre uses.

a. Does the policy clearly set out what type and level of town centre uses would be required and are they justified?

6b.24.1 The Site allocation Policy PS10 should be read as a whole with other policies. Town centre uses will be located according to the Retail Hierarchy as set out in CP12.

6b.24.2 This is justified through The Stroud Town Centres and Retailing Study 2010, as amended by the Retail Study Update 2013 and Retail/ Town Centre Planning Policy Advice 2021, identifies and assesses the higher levels of this hierarchy and this is reflected in Core Policy CP12. The hierarchy reflects the scale, nature and role of the centres and their importance within the retail and leisure offer in the District.

b. Is the police station still in use? Has the local constabulary confirmed whether a replacement police station is required or not? If this is required can the other policy requirements be accommodated on site?

- 6b.24.3 The site is used as a police station and the medium term plans are to remain in that location therefore the Council considers this site to be available in the later stages of the plan.
- 6b.24.4 The Police estate has been reviewed to establish potential alternative locations to host the police.
- c. The policy also requires particular issues to be addressed including site levels and proximity to the Stroud Town Centre Conservation Area. What is actually required from development in these terms, does this need to be made more explicit within the policy or are requirements set out in other Plan policies?
- 6b.24.5 The Council considers the intent behind Local Sites Allocation Policy PS12 accords particularly with the advice in National Planning Practice Guidance (Paragraph: 003 Reference ID: 18a-003-20190723) that;
- “...plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area.”*
- 6b.24.6 Whilst the Council expects that the form of future development here will be guided principally through the site allocation policy, the ‘whole ‘plan’ approach means that more specialist policies, including ES10 (Valuing our historic environment and assets) and others dealing with design and placemaking, provide specific criteria to be addressed by developers and considered by decision makers.
- 6b.24.7 The Council considers Local Sites Allocation Policy PS10 has usefully signposted the developer to the issues that need to be addressed and is not an unnecessary duplication of other Plan policies.
- 6b.24.8 The allocation policy and supporting text identifies the Town Centre Conservation Area, site levels and the existing pattern of spaces and buildings within the area as key considerations; and requires development to consider the potential for redevelopment to provide a new high quality landmark building to enhance this important gateway to the town (the site is a key gateway to the conservation area); the supporting text sets out that the Council expects development to enhance public realm and retain important trees.
- 6b.24.9 Whilst these requirements are not all explicitly linked to heritage as a driver, the Council considers this to be effective and justified guidance about what is required from the development in this context and considers that it reflects the Plan’s evidence base.
- 6b.24.10 Scope for conservation or enhancement of heritage assets formed a key part of the Strategic Assessment of Land Availability and is evidenced for this site through the SALA Heritage Impact Appraisal 2017 (EB50, page STR 17), which identifies the site’s location bordering the Town Centre Conservation Area as key,

as well as its proximity and potential to affect the setting and significance of listed buildings nearby (including St Lawrence Church, the Old Vicarage, buildings on The Shambles and at the top of the High Street). EB50 identifies that there are *“potentially positive heritage benefits from redevelopment, including opportunities to enhance the setting of both the Town Centre CA and the Top of Town CA, as well as nearby listed buildings, and to enhance the townscape through appropriately scaled redevelopment and infill. In particular, new infill along the Parliament Street frontage could improve the streetscape and repair the character, urban grain, permeability and appearance of this 'gateway' to the town centre”*. EB50 highlights key features of the site and its surroundings that contribute to the character and significance of the conservation areas and other heritage assets identified and advises on how these features might influence the layout, scale and massing of new development.

6b.24.11 The Council is wary that any such specificity mustn't limit the effective application of ES10 by implying that unmentioned heritage assets (including undesignated assets of local significance) are necessarily considered insignificant.

- d. Why is it necessary, within the supporting text, to make reference to the potential for a wider redevelopment site to include the neighbouring Church Street car park site? Is this a separate site allocation within the Plan?

6b.24.12 Car parking provision for Stroud town centre is to be reviewed as part of the proposed redevelopment of PS10 Cheapside, and as such presents the potential opportunity for Church Street car park to be incorporated into a wider town centre regeneration scheme. Future proofing this potential opportunity in this policy will prevent any future piecemeal and disjointed development in this town centre location.

Local Sites Allocation Policy STR065 Land at Beeches Green, Stroud

25. This 'current NHS health centre site' is allocated for approximately 20 dwellings, healthcare and extra care accommodation.

- a. Is the health centre still in use? Has the local NHS Trust confirmed that replacement healthcare facilities are required? If this is required can the other policy requirements be accommodated on site?

6b.25.1 Site STR065 is part of the Council's successful One Public Estate (OPE) bid and funding has been secured to develop a Masterplan. Much of the healthcare facilities on the site have now relocated, with only a GP practice remaining. The Council are working with NHS Property Services to establish whether the GP practice remains on site as part of the masterplan, or whether it is relocated.

- b. What size of extra care accommodation is required, is it feasible and is it justified by robust evidence?

6b.25.2 These details are still to be developed with NHS Property Services as part of the site Masterplan.

- c. The policy also requires particular issues to be addressed including enhancing the setting of adjacent listed buildings and improving sustainable access through the site. Are the requirements relating to the historic environment justified and consistent with national policy? Is sustainable access through the site feasible? Do these requirements duplicate other Plan policies?

6b.25.3 The Council considers the intent behind Local Sites Allocation Policy STR065 accords particularly with the advice in National Planning Practice Guidance (Paragraph: 003 Reference ID: 18a-003-20190723) that;

“...plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area.”

6b.25.4 Whilst the Council expects that the form of future development here will be guided principally through the site allocation policy, the ‘whole ‘plan’ approach means that more specialist policies, including ES10 (Valuing our historic environment and assets) and others dealing with design and placemaking, provide specific criteria to be addressed by developers and considered by decision makers.

6b.25.5 The Council considers Local Sites Allocation Policy PS10 has usefully signposted the developer to the issues that need to be addressed and is not an unnecessary duplication of other Plan policies.

6b.25.6 The allocation policy and supporting text identifies the setting of adjacent listed buildings as a key consideration; and requires development to make efforts to positively enhance that setting. The Council considers this to be effective and justified guidance about what is required from the development in this context and considers that it reflects the Plan’s evidence base.

6b.25.7 Scope for conservation or enhancement of heritage assets formed a key part of the Strategic Assessment of Land Availability and is evidenced for this site through the SALA Heritage Impact Appraisal 2020 (EB53, page 21), which identifies the site’s location adjoining and affecting the setting of St Roses Special School (Grade II) and four individually listed buildings at the neighbouring St Rose’s Convent (all Grade II) as key. EB53 identifies that there is *“Some scope to positively enhance the setting of the Convent, subject to design, scale and massing; conversely, tall buildings could have a negative and harmful impact”*.

- d. Why is it necessary, within the supporting text, to make reference to opportunities for wider regeneration within the locality? Is this set out in other policies in the Plan?

- 6b.25.8 Site STR065 is part of the councils successful One Public Estate (OPE) bid and funding has been secured to develop a Masterplan for the wider site including land adjacent to STR065. Referencing opportunities for wider regeneration within the locality ensures that land uses and infrastructure will be developed in an integrated and co-ordinated manner.
- 6b.25.9 Additionally, the site is included within Zonal Policy ZP5 in the Stroud NDP recognising the need for an integrated approach to development of the whole Beeches Green area.

Matter 6c Stonehouse cluster site allocations

Local Sites Allocation Policy PS42 Land off Dozule Close, Leonard Stanley

26. The site is allocated for up to 15 dwellings and associated open space uses.
- a. The policy seeks the retention of the majority of the southern part of the site in open space use and the conservation of existing hedgerows and trees. Are these requirements justified and sufficiently clear to a developer or decision-maker?
 - b. The supporting text states that development should be focused on the northern part of the site with access from Dozule Close. Is this justified and should this be clearly set out within the policy?
 - c. The supporting text also references the provision of new footpath and cycle links. Is this justified and if so, should it be clearly set out within the policy?

6c.26.1 This site now expected to have planning permission granted (S.21/2860/OUT) by the end of March 2023. The Council would like to make a modification to remove as an allocation and allocate as a commitment.

Local Sites Allocation Policy PS16 South of Leonard School Stanley Primary School

27. The site is allocated for up to 25 dwellings and associated open space uses.
- a. The policy seeks the conservation of existing hedgerows and trees adjacent to Bath Road. Is this justified and achievable?

6c.27.1 The Council considers the existing hedgerows and trees provide not only habitat for biodiversity but are important components in the local character and sense of place. The SALA assessment illustrated the level of development proposed should enable the retention of these important features.

- b. The supporting text references the provision of new footpath and cycle links. Is this justified and if so, should it be clearly set out within the policy?

6c.27.1 The Council considers the provision of new footpath and cycle links on site to be justified. The District Council is working with local communities, Gloucestershire County Council and other stakeholders to deliver an ambitious strategic network of walking and cycling routes across the District, focussed along key movement corridors, joining up our main settlements and key employment areas, to provide safe and sustainable travel routes as well as supporting wider health and wellbeing, leisure and tourism objectives.

- 6c.27.2 The Council does not consider that details on the provision of new footpath and cycle links should be set out within the policy. The plan should be read as a whole, with Delivery Policy Ei13 setting out requirements to protect and extend walking and cycling routes.
- 6c.27.3 The Council does wish to make an amendment to the site boundary. The promoter has requested the removal of a small part of the site which they would like to be kept for school expansion, should it be required in the future. The new boundary does not affect the deliverability of the site. This is shown in Appendix 5.

Local Sites Allocation Policy PS17 Magpies site, Oldends Lane, Stanley

28. The site is allocated for up to 10 dwellings, a new community building with car parking and landscaping.
- a. The policy requires the safeguarding of land to allow for a future pedestrian bridge across the railway line at Oldends Lane.
- i. Is the bridge required and if so what progress has been made on securing it?
 - ii. Is suitable land available to the west of the railway line for the bridge? If not, how will the bridge be delivered?
 - iii. What is the timescale for the delivery of the bridge and is funding in place for its construction?
 - iv. Overall is the bridge feasible and is the safeguarding of land justified?

6c.28.1 During the plan period the Council expects rail services to be increased at Charfield and Stonehouse stations, together with signalling improvements and a range of increased services proposed by Metro West around Bristol. This will lead to more trains on the line and could mean longer waiting times at level crossings. It's recognised that the level crossing on Oldends Lane acts as a barrier between the areas east and west of Stonehouse and this will increase with greater services. The pedestrian footbridge is a longer term aspiration and is not required to meet specific development needs. The site will not be expected to pay for the bridge and there is no agreed funding or scheme agreed at this time. But the Council considers it justified with regard to good place-making principles to safeguard a small section of the site to ensure future walking and cycling connections can be provided.

- b. Is the policy clear on what landscaping would be required or is this covered by other Plan policies?

6c.28.2 Delivery policies ES6 Providing for biodiversity and geodiversity, ES7 Landscape character and ES8 Trees hedgerows and woodlands set out the development management policy framework for the detailed consideration of biodiversity and

landscaping provision at the planning application stage to deliver high quality sustainable development in accordance with Local Site Allocation Policy PS17 requirements.

- c. Has an appropriate delivery timeframe for the development of the site been identified in the housing trajectory and is this realistic, particularly taking into account the requirement for a new community building? Is the housing provision tied in with the delivery of the community building?

- 6c.28.3 The site has been promoted by Stonehouse Town Council, the community building would be required to provide a Section 106 agreement to contribute towards the redevelopment of the existing facilities. This would be addressed at the development management stage and through the required masterplan and include s106 amounts and triggers.
- 6c.28.4 On the evidence available, the Council considers the site can realistically be delivered within the medium to long term of the plan period.

Strategic Site Allocation Policy PS19a Stonehouse North West

29. The site is an extension to Stonehouse at Great Oldbury. It is allocated as a mixed use development including approximately 700 dwellings, 8 plots for travelling showpeople uses, approximately 5 ha for defined employment uses and the provision of or contributions to community facilities. The policy seeks a development brief incorporating an indicative masterplan, that will address 21 listed requirements.

- a. Are all the 21 criteria, which list a varied range of requirements, justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective?

- 6c.29.1 Strategic Site Allocation Policy PS36 includes within it 21 criteria which will need to be satisfied in order to achieve a successful development. The criteria have been put together having regard to a range of evidence based studies, many based upon infrastructure needs identified in the Infrastructure Delivery Plan (IDP) (EB69 and EB110).

- b. Have impacts of the development on existing infrastructure been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?

- 6c.29.2 The criteria have been put together having regard to a range of evidence based studies, many based upon infrastructure needs identified in the Infrastructure Delivery Plan (IDP) (EB69 and EB110). The IDP has involved collaborative discussions with infrastructure providers and site promoters, with requirements identified by sector and by strategic site. There is a clear signpost to addressing identified constraints and recommendations referred to in the IDP in the policy.

c. Do any policy requirements duplicate other Plan policies and if so, why?

6c.29.3 The approach of the SDLP is for matters of broad policy and principle to be set out within Core Policies and for more specific policy to be provided through the various detailed delivery policies set out in the SDLP. In this case, the Site Allocation Policies contain strategic requirements or signpost the reader to more detailed matters covered elsewhere when the plan is read as a whole. Therefore, the Council does not consider there is any unnecessary duplication between the Site Allocation Policies and the more detailed Delivery Policies. The Council believes the SDLP is sound in this regard.

d. As regards the provision of 8 plots for travelling showpeople uses:

i. Have discussions with the travelling showpeople community taken place to assess both the suitability of the overall location and the site?

6c.29.4 Through the GTAA work discussions with local Travelling Showpeople have taken place. Taking account of an existing Travelling Showpeople site at Fairlands in Stonehouse, the Council consider this general location is suitable. However, further discussions will take place at the development management stage with the Travelling Showpeople community.

ii. Are some areas within the site considered more suitable for this use than others? For instance, can easy and separate access to the local highway network be achieved?

6c.29.5 The Council does not consider it the role of the SDLP to set out the exact location of use types and final layout of the development. This will be done through the development management process with the site developers and Council through the masterplan requirement.

iii. Each plot will typically need to include space for caravan accommodation and for the storage and maintenance of rides, and other vehicles and equipment. Has the extent of the land area required for the proposed 8 plots been determined and can this be easily accommodated within the proposed development?

6c.29.6 The term 'plot' refers to the space required on a site to accommodate a household of Travelling Showpeople. These are also referred to as 'yards'. In addition to the basic on site facilities, plots for Travelling Showpeople also include an area to store and maintain their show equipment. There is no standard size for plots as these can vary, however the Showmen's Guild of Great Britain advise, 'as a rule of thumb one acre of land can accommodate ten showmen's caravans and accompanying vehicles and equipment.'

- 6c.29.7 The Council considers these specifications can be accommodated on the site through the development management process, with the site promoters through the masterplan requirement.
- e. Paragraph 3.2.13 of the Plan refers to the need for substantial structural landscaping to protect the landscape setting of Standish, open countryside and views from the AONB. Is this effectively set out in the policy?
- 6c.29.8 Delivery policies ES6 Providing for biodiversity and geodiversity, ES7 Landscape character, ES8 Trees, hedgerows and woodlands and CP15 A quality living and working countryside set out the development management policy framework for the detailed consideration of biodiversity, landscaping and to protect the separate identity of settlements provision at the planning application stage to deliver high quality sustainable development in accordance with Local Site Allocation Policy PS19a requirements.
- f. Reference has been made within the representations to adverse impacts on the River Frome Local Wildlife Site and the Severn Estuary SPA, SAC and RAMSAR sites. Has the impact of the site allocation been suitably assessed and any necessary mitigation determined in these regards?
- 6c.29.9 The Council considers the representations to be mistaken as this site does not fall within the catchment areas for these considerations.

Strategic Site Allocation Policy PS20 Stonehouse – Eco Park M5 Junction 13

30. This site is allocated for a strategic mixed use development, to include employment, a sports stadium, sports pitches, a 70 bed care village, a hotel and canal and open space uses. The policy seeks a development brief incorporating an indicative masterplan, that will address 20 listed requirements.
- a. The County Council representation highlights that part of the site allocation falls within designated Mineral Safeguarding Areas (MSAs) and that no reference is made to this within the policy or supporting text. This issue is acknowledged in the relevant Statement of Common Ground. What extent of the site is within the MSAs and what implications does this have for the allocation and the policy overall?
- 6c.30.1 The Council has been working with the County Council and promoter to address this issue. A minor modification has been suggested by the County Council and agreed with the District Council and the promoter. The details of this are included in the updated Statement of Common Ground with both the County Council and

promoter. It is for the inspectors to consider whether the proposed amendment is acceptable.

- b. The supporting text states that the site is 42 ha in size. Approximately 10 ha of land for business uses are defined under criterion 2. How has this been determined and is it justified? Do the other proposed uses add up to the remaining 32 ha and are they justified?

- 6c.30.2 The justification for the site's 10ha allocation for employment purposes is clearly set out within the Councils evidence base. The Economic Need Assessment (EB29) identifies the M5 corridor as the key location for industrial and distribution occupiers (with the Junction 13 being identified as one of the key areas of interest), as well as being popular for office occupiers. Demand is also high along the A417/A419 corridor. It identifies that *'Gloucestershire has a very skilled workforce – particularly relating to certain high-end manufacturing sub-sectors, and other highly skilled sectors such as nuclear energy, other forms of energy, and cyber security. For this reason, the majority of occupiers would not generally seek to move beyond the M5 corridor into other locations within Gloucestershire'*. The ENA also highlights that there is a need for sites which are deliverable immediately or in the short term, and *'this requires allocation of a range of site sizes'*
- 6c.30.3 The ELR also identifies six key segments of market demand for future employment land supply to satisfy, including encouraging the growth of the high-technology sectors, particularly focussed on green technologies. This is on the basis that there were *'53,730 green jobs and 9,270 green businesses in Gloucestershire in 2018/19.'* The assessment then assesses a number of sites regarding their potential to be allocated within the Local Plan Review. PS20 is identified as one of two highest scoring sites. The report therefore recommends the site is allocated within the SDLPR.
- 6c.30.4 Regarding other proposed uses, the illustrative masterplan, Land Use Parameter Plan and Green Infrastructure Parameter Plan submitted with the Eco-Park application (S.22/0206/OUT) show that all land uses identified within the policy, as well as the proposed transport hub, maintenance building, parking, landscaping and other ancillary works all fall within the 42ha site.
- 6c.30.5 The proposed stadium, sports pitches and ancillary facilities, are justified as they meet the needs of Forest Green Rovers Football Club (FGRFC). The existing stadium at New Lawn was not designed to accommodate the large match day crowds, and the limited accessibility by public transport, lack of parking onsite, and issues with power and water availability to provide sufficient ancillary facilities (e.g. catering), all provide significant difficulties on match days. The intention is to relocate the Stadium, and its training facilities to a single location at Eco-Park and will provide the Club with a ground where it can consolidate its activities, grow the sport, future proof the Club and ensure that it has a healthy and sustainable future. The relocation is essential for FGRFC's continued growth.
- 6c.30.6 Hotel use is justified as the Local Plan identifies one of the priority issues is to continue to develop the tourism potential of our area as a unique selling point for

living, working, visiting and investing in the District. There is relatively limited supply of modern hotel beds within the immediate vicinity of the site, particularly a lack of luxury hotels (4-5 star), and the site is an attractive location given its proximity to the M5 Motorway and the Cotswolds. The proposed stadium, employment development and the reinstatement of the canal will also increase demand for hotels beds in this location

6c.30.7 The proposed Care Village is justified as the Local Plan identifies the ageing population in Stroud and identifies a need to provide housing for older people including sheltered and extra care. Policy DCP2 states that development of specialist older person housing will be supported in accessible locations, and that developments will be supported that increase the range of available housing options with care and support services in accessible locations. The allocation of a Care Village in this location is considered to assist in meeting this overall strategy.

c. What is meant by a 'care village' and is this robustly justified in this location? Is the size of the facility (70 bed) based on need and is it viable?

6c.30.8 The Site Promoters have identified that the Care Village will include a 70 bed care home, care apartments, as well as communal facilities. The delivery of a variety of housing types as part of a Care Village provides the opportunity to meet the needs identified within the District, as well as providing a genuine community with flexibility to remain on site as residents' needs change with the availability of 24-hour care on site.

6c.30.9 The promoters have provided the following commentary:

The Gloucestershire Local Housing Needs Assessment 2019 Report of Findings (LHNA - EB10) highlights that the growth in the older population in Gloucestershire represents over 90% of the overall population growth; 63,368 persons from a total growth of 69,372 persons are projected to be aged 65 or over, including an increase of 20,218 persons aged 85 or over. At the Stroud level, the Gloucestershire Local Housing Needs Assessment shows the most significant growth in those over 65. The ONS Subnational Ageing Tool highlights that in Stroud, by 2043, almost 29% of the population will be over 65, and almost 5% will be over 85. This is higher than the national average, as well as the average for the South-West Region. It is therefore clear that the population is ageing at a national level, and this is even further pronounced in Stroud.

6c.30.10 The NPPF identifies that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including older people). The Gloucestershire LHNA 2019 identifies the potential requirement for new specialist housing, taking account of the current population and existing stock together with the additional demand for the period 2021- 2041 based on the projected change in population aged 75+. It only assesses the need for sheltered and extra -care accommodation within Gloucestershire and does not include any other forms of housing for older people.

6c.30.11 The SDLPR identifies this need, recognising at Paragraph 4.8 that the District has an ageing population, with the number of people aged 65 and over estimated to

increase by 12,227 over the Plan period. Policy DCP2 highlights *that 'there is an overall modelled demand of 3,091 older person homes for the Plan period, split between 2,811 sheltered housing and 280 extra care. The development of specialist older person housing will be supported within both the owner occupied and rented sectors in accessible locations.'* It identifies that developments will be supported that, amongst others, *'increase the range of available housing options with care and support services in accessible locations.'* The allocation of a Care Village in this location is considered to assist in meeting this overall strategy for ensuring the needs of older people are met.

6c.30.12 The Eco-Park application (S.22/0206/OUT) includes the provision of a Care Village, incorporating a 70 bed care home, care apartments and communal areas. The Site Promoters have also identified that there have been 'expressions of interest' from Care Operators. It is noted that the Site Promoters have requested the removal of 70 bed requirement to allow the end user flexibility to respond to the market when the scheme is developed (as set out within the SOCG).

d. As regards the Industrial Heritage Conservation Area (IHCA):

i. Paragraph 3.2.21 implies that part of the development proposals would be located within the IHCA. Is this the case?

6c.30.13 Yes, part of the development proposals will be located within the IHCA .

ii. Is the canal cut and towpath etc located within the site?

6c.30.14 Yes, the canal cut and towpath are located within the site.

iii. Criterion 9 implies that there will be harm to the IHCA from the development of the site, as the wording seeks less than substantial harm. Is this approach consistent with national policy and legislation, particularly as regards the desirability of preserving or enhancing the character or appearance of a conservation area? Is the approach justified?

6c.30.15 The Council considers the use of wording that refers to "less than substantial harm" is consistent with national policy and guidance about the need to consider development impacts on heritage assets, including harm or loss. The NPPF (para. 199-208) and national Planning Practice Guidance (Reference ID: 18a-018-20190723 and 18a-019-20190723) are clear that any harm to a designated heritage asset requires clear and convincing justification; and that where the likely effect of an application would be to cause less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

6c.30.16 Justification for the loss of an element (such as open space) which makes a positive contribution to the significance of a conservation area needs to be proportionate to its relative significance and its contribution to the significance of

the conservation area as a whole (Paragraph: 019 Reference ID: 18a-019-20190723).

- 6c.30.17 Scope for conservation or enhancement of heritage assets formed a key part of the Strategic Assessment of Land Availability and is evidenced for this site through the SALA Heritage Impact Appraisal 2017 (EB50, page EAS 6), which identifies the Stroud Industrial Heritage Conservation Area (IHCA) designation as key, as well as the potential for development to deliver canal restoration (the Stroudwater Canal is identified as a non-designated heritage asset of local significance in its own right, as well as being a key feature of the conservation area). EB50 highlights key features of the site and its surroundings that contribute to the setting and significance of the conservation area and advises on how these features might influence the scale and massing of new development. EB50 highlights the agricultural character and open nature of the site as important to the character of the conservation area and to the historic context and significance of Meadow Mill.
- 6c.30.18 The policy wording (criterion 9) requires “A layout of uses, density and built form and character which ensures less than substantial harm to IHCA”. Supporting text (paragraphs 3.2.21 – 3.2.23) expands upon this, explaining that the policy expectation is for development to “have minimal harm and impact on the IHCA” and to involve “high quality design and sensitive treatment”, specifically limiting the type and extent of development within the IHCA and on the portion of the site lying south of the A419.
- 6c.30.19 The Plan acknowledges that there will be some degree of “harm” as a consequence of the allocated development, in that there will be a noticeable alteration to the rural, undeveloped character and appearance of the conservation area in this location:
- “...Whilst the character of the IHCA at this location will change with the new canal cut and provision of sports pitches on current agricultural land, the public benefit to the people of Stroud will in principle outweigh any material harm to the IHCA. However, it is important within this context for the scheme to secure the delivery of the canal cut, towpath and operational uses as part of the restoration of the Stroudwater Navigation as it will provide the mitigation essential to minimise any harm of the wider scheme upon the IHCA.” (CD1, para.3.2.22)*
- 6c.30.20 The Council considers the broad aims and approach of the site allocation policy, in seeking to ensure less than substantial harm to the IHCA, are justified and consistent with national policy and legislation.
- 6c.30.21 Furthermore, whilst the Council expects that the form of future development here will be guided principally through the site allocation policy, the ‘whole plan’ approach means that more specialist policies, including ES10 (Valuing our historic environment and assets), provide specific criteria to be addressed by developers and considered by decision makers.
- 6c.30.22 The Council considers the Plan as a whole sets out a positive strategy for the conservation and enjoyment of the historic environment, and that Policy ES10 will

ensure that special attention (great weight) will be given to the desirability of conserving or enhancing the conservation area's character, appearance and significance, in accordance Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF (para.199) and National Planning Practice Guidance (particularly Paragraph: 003 Reference ID: 18a-003-20190723).

6c.30.23 However, the Council does recognise that a succinct addition to the policy wording (at criterion 9, or elsewhere) could add to the allocation policy's effectiveness, and accord more closely with legislation and national policy, by explicitly highlighting the need to conserve and enhance heritage assets (as part of a positive strategy for the conservation and enjoyment of the historic environment), rather than having a narrow focus on avoiding harm.

e. Are there particular reasons as to why certain facilities, such as the sports stadium and care village, are to be located in specific areas of the site? Does this overly restrict the development brief process?

6c.30.24 The Policy specifically limits the type and extent of development within the IHCA and on the portion of the site lying south of the A419, for heritage conservation reasons.

6c.30.25 The general location of the uses within the site have been informed by the Promoter Material submitted in relation to Policy PS20, namely the Vision Document, as well as the Stadium Planning Permission (S.19/1418/OUT) and EcoPark application (S.22/0206/OUT). However, it is noted that the Site Promoters have requested flexibility as noted within the SOCG to allow for the location of proposed uses to be determined by the masterplanning exercise.

f. What progress has been made on the re-opening of Stonehouse Bristol Road rail station, what are the timescales for its delivery and is it feasible? Is criterion 15 justified?

6c.30.26 Significant sustainable transport measures can be introduced as part of the development of PS20, irrespective of the re-opening of this station. Therefore, whilst the allocation is not dependent on the re-opening of Stonehouse Bristol Road railway station, it would enhance the accessibility to the site further as it would remove the requirement for bus connections to Cam and Dursley and would be within walking and cycling distance of the proposed allocation. It is therefore considered that proportionate contributions are justified.

6c.30.27 In March 2020, Stonehouse Town Council and Rail Future submitted a bid to the Department for Transport's (DfT) Restoring Your Railway Fund. In March 2021, the DfT asked Stonehouse Town Council to submit a second bid to the Restoring Your Railway Fund. Stonehouse Town Council wrote the bid with support from Stroud District Council and Gloucestershire Community Rail Partnership. In October 2021, it was announced that the proposal to re-open Stonehouse Bristol Road Station has received a £50,000 award from the DfT's Restoring Your

Railways Ideas Fund. The funding was for feasibility studies to develop the Strategic Outline Business Case (SOBC) for the station.

- 6c.30.28 The SOBC was submitted to the DfT by Stonehouse Town Council, working in partnership with Stroud District Council, Network Rail, Great Western Railway and other key stakeholders including Gloucestershire County Council and the Gloucestershire Community Rail Partnership. Stonehouse Town Council are now awaiting an announcement from Government on whether the project can proceed to the next more detailed Outline Business Case stage.
- 6c.30.29 Progress has therefore been made to the reopening of this station and therefore the policy is justified in adding a criterion to Policy in order to help sustain the development and growth of alternative means of transport in the locality, and in turn, supporting the sustainability of this site.
- 6c.30.30 The delivery timescale will be fully developed as part of the Management Case at Outline Business Case stage. However, it is expected that a station of the size expected at Stonehouse would take around three to four years to deliver.
- g. Overall, are all the policy requirements justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective?
- 6c.30.31 A number of the policy requirements - with the exception of those considered separately under other Matter 6 questions above - relate to the provision of sustainable transport. The majority of these provisions are set out within the Councils Sustainable Transport Strategy (EB60) and Addendum (EB108). These measures are supported by the Promoter and are reflected in both the Stadium Planning Permission (S.19/1418/OUT) and Eco-Park application (S.22/0206/OUT). It is considered that these will support behavioural change and modal shift, supporting the Council's overall zero-carbon agenda, and are therefore justified.
- 6c.30.32 Criterion 11 relates to contributions towards sustainable travel measures on the A38 and A419. Whilst the Promoter recognises the improvements required to the A419, they have highlighted that improvements may not be required for the A38 and this should be made clearer within the wording to the policy.
- 6c.30.33 In respect of criterion 14, the Stadium Planning Permission (S.19/1418/OUT) secured a dedicated shuttle bus service to be used for the stadium on match days, between the site and Stonehouse and Cam and Dursley rail stations, and Nailsworth and Stroud town centre. The provision of a shuttle bus on match days is justified and the promoters have requested that this wording is updated accordingly.
- 6c.30.34 Regarding criterion 16, Building Regulations Part S also came into force in 2022 so there is now a national standard that will be enforced prior to the occupation of any building.

6c.30.35 Site Promoters have requested that criterion 20 be removed on the basis that it is too open ended and may require a contribution for highway works that are not required or in any way related to the allocation. The Promoters also consider that the requirements are appropriately covered by criteria 10 to 18 and this is therefore unnecessary. Full details can be seen in the Statement of Common Ground which also recognises that any improvements to the highway network should be proportionate and shared between all benefiting developments.

- h. Have impacts of the development on existing infrastructure been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?

6c.30.36 The Infrastructure Delivery Plan June 2021 (EB69) and the 2022 update (EB110) both include sections covering the Stonehouse Cluster proposed allocations and the infrastructure requirements.

6c.30.37 In terms of Transport Infrastructure, the impacts of the development have been assessed in the Traffic Forecasting Report (EB61 and EB98), as agreed with Gloucestershire County Council and National Highways (as evidenced by the Duty to Co-operate Statement – EB03), and within the Sustainable Transport Strategy to promote sustainable transport and align with the net zero carbon goals of the Council. Both these documents are further supported by the Transport Funding and Delivery Plan (EB109) which sets out how the required transport mitigation will be funded by the various allocations.

6c.30.38 Further historic information is contained within the 2021 Infrastructure Funding Statement (EB102) which sets out the available CIL funding at that point in time.

- i. Do any policy requirements duplicate other Plan policies and if so, why is this necessary?

6c.30.39 It is noted that other policies in the Plan set out a number of criteria that any application for development will need to accord with. Whilst it could be deemed that certain criteria are set out within other policies of the SDLPR (e.g. in relation to SUDS, wastewater, layout and design, and encouraging sustainable transport), the policy sets out specific expectation as to what is required in respect of the allocation. As such, it reinforces the strategy set out elsewhere.

Matter 6d Cam and Dursley site allocations

Strategic Site Allocation Policy PS24 Cam North West

31. The site is identified as a sustainable urban extension to Cam and is allocated for strategic housing development, to include approximately 900 dwellings and community uses. The policy seeks a development brief incorporating an indicative masterplan, that will address 18 listed requirements.

a. Paragraph 3.3.6 of the Plan states that the development will include 'residential and community uses that meet the day to day needs of its residents'. Whilst the policy seeks educational and healthcare provision or contributions, there appears to be no provision for employment and retail uses which are generally necessary to meet day to day needs. Is this because such facilities are within close proximity and if so, what are the walking distances to such facilities from within the site?

6d.31.1 The Council considers the site is in close proximity to the existing employment and retail facilities of Cam and Dursley. The site has immediate access to employment through Draycotte Business Park which is located to the East of the site on the opposite side of the A4135 which is a distance of 430m approx. as measured from the centre of each site. Northeast Cam which was allocated in the 2015 Local Plan has provision for 12ha of employment uses and is 795m approx. from the centre of each site.

6d.31.2 Cam has a strong local retail role, with several 'neighbourhood' shopping areas and a range of local shops in the main village centre, which serves the day-to-day needs of surrounding villages and hamlets. There is a convenience retail store located 350m approx. from the centre of the site.

b. Are all the 18 criteria, which list a varied range of requirements, justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective?

6d.31.3 Strategic Site Allocation Policy PS24 includes within it 18 criteria which will need to be satisfied in order to achieve a successful development. The criteria have been put together having regard to a range of evidence based studies, many based upon infrastructure needs identified in the Infrastructure Delivery Plan (IDP) (EB69 and EB110).

c. Have impacts of the development on existing infrastructure been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?

6d.31.4 The criteria have been put together having regard to a range of evidence based studies, many based upon infrastructure needs identified in the Infrastructure Delivery Plan (IDP) (EB69 and EB110). The IDP has involved collaborative

discussions with infrastructure providers and site promoters, with requirements identified by sector and by strategic site. There is a clear signpost to addressing identified constraints and recommendations referred to in the IDP in the policy.

- d. Do any policy requirements duplicate other Plan policies and if so, why is this necessary?

6d.31.5 The approach of the SDLP is for matters of broad policy and principle to be set out within Core Policies and for more specific policy to be provided through the various delivery policies set out in the SDLP. In this case, the Site Allocation Policy PS24 contains strategic requirements or signposts to consider the more detailed matters which are covered elsewhere in the Detailed Delivery policies. The Council does not consider there is any duplication between the Site Allocation Policies and the more detailed Delivery Policies and the SDLP is sound in this regard.

- e. Paragraph 3.3.9 of the Plan refers to the need for substantial structural landscaping to protect Cam's landscape setting and views from the AONB escarpment. Is this effectively set out in the policy and does the approach accord with paragraph 176 of the Framework as regards the setting of the AONB?

6d.31.6 The NPPG was revised in 2019, and provides for the first time advice on how development within the setting of AONBs should be dealt with: "Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.". There have been various High Court judgements and appeal decisions that confirm that setting of AONBs can be a relevant consideration.

6d.31.7 Site allocation Policy PS24 and Delivery Policy ES7 makes explicit reference to the AONB setting, because of the upland nature of the Cotswolds including its scarp makes it a prominent feature in the wider landscape, particularly in views towards the scarp from the Severn Vale and Estuary. Long distance panoramas are offered across open countryside, particularly from the scarp, primarily in westerly and southerly directions. Views from locations such as Coaley Peak South Westerly towards Cam have remained critical to its value and to public enjoyment. The setting of the scarp has long been held to be integral to the experience of the AONB and a particularly important element of the AONB that merits protection. The setting of the Cotswolds AONB does not have a geographical border. In most cases, the setting comprises land outside the AONB which is visible from the AONB and from which the AONB can be seen. The setting may be wider however, for example when affected by features such as noise and light. In some cases, the setting area will be compact and close to the

AONB boundary, perhaps because of natural or human made barriers or because of the nature of the proposed change. However, the setting area maybe substantial for example where there is a contrast in topography between higher and lower ground in this District. The Council consider the need for a substantial landscape buffer in order to protect the setting of the AONB and views across the valley that Cam sits within.

- f. Reference has been made within the representations to potential adverse impacts on the Severn Estuary SPA, SAC and RAMSAR site. This potential is recognised in paragraph 3.3.10 of the Plan. Has the impact of the site allocation been suitably assessed and any necessary mitigation determined in these regards?

6d.31.8 The HRA has evaluated the impacts of the allocation and made recommendations on how to mitigate them. A key impact arises from recreational pressure. This has been assessed through recreational study works and as a consequence the accompanying mitigation strategy identifies the extent of the core catchment area for the estuary. The seven estuary mitigation strategy was adopted in 2016. The Council is undertaking work with our consultants to update that strategy in the next year.

Strategic Site Allocation Policy PS25 Cam North East Extension

32. The site is identified as a southerly extension to the existing North East of Cam (Millfields) strategic development site. It is allocated for approximately 180 dwellings and associated community and open space uses. The policy seeks a masterplan, and states that development will include 8 listed requirements.

- a. Are the 8 criteria justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective?

6d.32.1 Strategic Site Allocation Policy PS25 includes within it 8 criteria which will need to be satisfied in order to achieve a successful development. The criteria have been put together having regard to a range of evidence based studies, many based upon infrastructure needs identified in the Infrastructure Delivery Plan (IDP) (EB69 and EB110).

- b. Have impacts of the development on existing infrastructure been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?

6d.32.2 The criteria have been put together having regard to a range of evidence based studies, many based upon infrastructure needs identified in the Infrastructure Delivery Plan (IDP) (EB69 and EB110). The IDP has involved collaborative

discussions with infrastructure providers and site promoters, with requirements identified by sector and by strategic site. There is a clear signpost to addressing identified constraints and recommendations referred to in the IDP in the policy.

- c. Some of the representations raise concerns about other issues relating to the development of the site, including lack of local facilities and services, flooding, impact on landscape/AONB and loss of wildlife. Have such factors been suitably assessed as part of the process to allocate this site?

- 6d.32.3 The Council considers that other issues relating to the development of the site have been suitably assessed as part of the process to allocate this site.
- 6d.32.4 Topic Paper: Assessment and selection of sites topic paper (EB9) sets out in detail the site selection process at each stage of the Local Plan review and how this has been suitably informed by evidence base studies, Sustainability Appraisal (SA) and representations received through Regulation 18 and Regulation 19 public consultation on the emerging Local Plan.
- 6d.32.5 Consultation reports for the Pre-Submission Plan (SLP-01a) and Draft Plan 2019 (CD4d) set out the concerns highlighted by representations and detail the Council's response to the issues raised.

Local Sites Allocation Policy PS27 1-25 Long Street, Dursley

- 33. The site is allocated for partial redevelopment and reuse for town centre uses.

- a. The supporting text refers to the need for land assembly to maximise the redevelopment opportunities of the site whilst still providing for existing uses.
 - i. What progress has been made on this land assembly and is the site allocation deliverable?

- 6d.33.1 The site is predominantly located within the identified town centre boundary of Dursley (CP12, EI8), a Tier 1 settlement, and comprises an underutilised area of land with potential to deliver environmental enhancements and improved pedestrian accessibility alongside partial redevelopment and re-use for town centre uses.
- 6d.33.2 Allocation of the site seeks to maximise opportunities for the site to contribute to the vitality of Dursley town centre by setting out a policy framework for partial redevelopment and re-use, to be achieved through master planning and land assembly, to secure improvements to the public realm. No progress has currently been made on land assembly but the Council maintain that the overall aims of the

site allocation policy are deliverable and are key to the successful integrated and co-ordinated redevelopment and re-use of the site.

ii. What existing uses are to remain?

6d.33.3 The site is currently used for informal parking, servicing and access in association with existing properties fronting Long Street which would need to be accommodated as part of masterplanned partial redevelopment and re-use.

iii. What amount of car parking (and any other operational requirements) will need to be retained and would this impact on any redevelopment opportunities?

6d.33.4 Masterplanning will need to demonstrate the provision of sufficient car parking and servicing arrangements to cater for existing and proposed uses, with opportunities for the rationalisation of existing arrangements as part of co-ordinated partial redevelopment and re-use of the site.

6d.33.5 Delivery policy EI12 sets out the development management policy framework for the detailed consideration of parking and accessibility provision at the planning application stage to deliver high quality sustainable development in accordance with Local Site Allocation Policy PS27 requirements.

b. Exactly what town centre uses are envisaged for the site and are these justified?

6d.33.6 Core Policy CP12 Town centres and retailing and Delivery Policy EI8 Town centres set out the development management policy framework for the detailed consideration of appropriate town centre uses at the planning application stage to deliver high quality sustainable development in accordance with Local Site Allocation Policy PS27 requirements.

6d.33.7 This is considered justified and in line with the NPPF which acknowledges that a wider mix of land uses are appropriate outside primary shopping areas within town centres to maintain and enhance 'town centre' vitality and viability.

6d.33.8 Dursley Neighbourhood Development Plan (NDP) Planning Policy E3: Town Centre further supports existing uses, new uses such as local markets and widening the range of town centre uses to promote convenient and accessible shopping, services and employment facilities to meet the day to day needs of residents.

c. Some representations have referenced the Dursley Neighbourhood Development Plan. What are the implications of this to the site allocation and the policy requirements?

6d.33.9 The site is predominantly located within the identified town centre boundary of Dursley (CP12, EI8). Dursley NDP Planning Policy E3: Town Centre reflects and reinforces Local Plan policy to maintain and enhance the vitality and viability of

Dursley town centre including through development that widens the range of convenient and accessible town centre uses to meet the day to day needs of residents.

6d.33.10 The allocation site adjoins the Dursley Town Centre Area subject to NDP Planning Policy TC1: Town Centre Public Realm Improvements specifically supporting proposals which help deliver enhancements to the Town Centre including improved pedestrian links, improved signage and street furniture, heritage trails and realising infill development opportunities.

6d.33.11 Other NDP policies D1: Character and design, T1: Car parking and T2: Improve connections for cyclists and pedestrians further require development to reflect the positive characteristics of a place, protect and enhance Dursley's historic assets and seek to support opportunities to improve the town centre car parking offer and provide better pedestrian and cycling connections to the town centre.

6d.33.12 Local Site Allocation Policy PS27 requirements provide a policy framework for the partial re-development and re-use of the site which addresses the issues highlighted in Dursley NDP policies and will enhance and support the vitality of Dursley town centre in accordance with Dursley NDP objectives.

d. The policy states that heritage assets need to be 'conserved and enhanced' through high quality design, but does not specify which heritage assets this relates to. The supporting text refers to the Dursley Conservation Area, and 'taking account of the site's archaeological potential and its contribution to the setting and significance of nearby listed buildings'.

i. What assessments, if any, have been carried out of the impact of the proposed partial redevelopment and reuse of the site on the significance of these heritage assets? How has this informed the decision to allocate the site and the development requirements?

6d.33.13 A rigorous site selection process (as evidenced through Topic Paper – Assessment and selection of sites, October 2021, EB9) has included assessment of potential development impacts on a range of heritage assets across Stroud District and informed the Council's choice of sites where there is scope for development to bring about the conservation or enhancement of heritage assets.

6d.33.14 This formed a key part of the Strategic Assessment of Land Availability (SALA) and is evidenced for this site through the SALA site assessment for DUR003 (EB19b) and accompanying SALA Heritage Impact Appraisal 2017 (EB50), which identifies the site's location within the Dursley Conservation Area and its proximity and potential impact on the setting of multiple Grade II listed buildings as key. EB50 also highlights archaeological potential, relating to historic burgage plots and identifies that there is "Scope for development which would have some positive heritage benefits. If designed to reflect the town's historic urban grain, new infill could enhance the character and appearance of the conservation area". EB50 highlights key features of the site and its surroundings that contribute to the character and significance of the conservation areas and other heritage assets

identified and advises on how these features might influence the layout, scale and massing of new development.

- ii. Is the approach in the Plan, in this respect, justified and is the wording in the policy consistent with national policy and legislation on the historic environment?

6d.33.15 The policy wording states that “*Particular issues to address include conserving and enhancing heritage assets through high quality design...*”. The Council considers this wording to be consistent with national policy. NPPF Chapter 16 (paragraphs 189-208) is entitled “Conserving and enhancing the historic environment” and covers diverse aspects of positive heritage asset management. National Planning Practice Guidance explains what is meant by the conservation and enhancement of the historic environment (Paragraph: 002 Reference ID: 18a-002-20190723). The Council considers the intent behind Local Sites Allocation Policy PS11 accords particularly with the advice (Paragraph: 003 Reference ID: 18a-003-20190723) that;

“...plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area.”

6d.33.16 Whilst the Council expects that the form of future development here will be guided principally through the site allocation policy, the ‘whole ‘plan’ approach means that more specialist policies, including ES10 (Valuing our historic environment and assets), provide specific criteria to be addressed by developers and considered by decision makers.

6d.33.17 ES10 supporting text (para.6.71) sets out what the Council considers to constitute a heritage asset, including archaeological remains and ranging from sites and buildings of local historic value to those of the highest significance, consistent with national policy (NPPF para. 189). ES10 Criterion 1 requires a heritage statement to be produced for any development proposals involving any one of those things, to ensure the impacts of potential development can be properly considered.

6d.33.18 The Council considers Local Sites Allocation Policy PS27 has usefully signposted the developer to the issues that need to be addressed. Whilst the policy refers only to “heritage assets” in general terms, the supporting text (3.3.16) provides adequate clarification. The text explains that the policy expectation is for development to conserve and enhance heritage assets within the Dursley Conservation Area and it flags up the site’s archaeological potential and likely impact on the setting of adjacent listed buildings. The text sets out an expectation of high quality design, which respects the town’s historic urban grain and vernacular character.

- 6d.33.19 The Council considers this to be effective and justified guidance about what is required from the development in this context and considers that it reflects the Plan's evidence base.
- e. The policy also requires the 'safeguarding and enhancing of local biodiversity' but does not provide specific detail on what this relates to. The supporting text refers to the need to conserve and enhance tree planting within the site. Is this policy requirement suitably clear and is it justified? Or is this issue covered by other Plan policies?
- 6d.33.20 The policy identifies the site issues to address at the masterplan stage, as part of a future planning application, to deliver high quality sustainable development having regard to potential impacts identified throughout the Local Plan review.
- 6d.33.21 The supporting text sets out how high-quality sustainable development will be achieved, informed by the evidence base; in particular SALA site assessment DUR003 (EB19b). Specifically, tree planting on the northern part of the sites should be conserved and enhanced to safeguard and enhance local biodiversity. Further justification for this approach is set out in the Summary of Regulation 20 responses to the Pre-Submission Draft Plan PART 1: Site Allocations (SLP-01a).
- 6d.33.22 Delivery policies ES6 Providing for biodiversity and geodiversity, ES7 Landscape character and ES8 Trees, hedgerows and woodlands set out the development management policy framework for the detailed consideration of biodiversity and landscaping provision at the planning application stage to deliver high quality sustainable development in accordance with Local Site Allocation Policy PS27 requirements.
- 6d.33.23 The Council considers this is a justified, suitably clear and consistent approach to all local site allocations identified in the Plan.

Local Sites Allocation Policy PS28 Land off Prospect Place, Dursley

34. The site is allocated for up to 10 dwellings, open space and town centre uses.
- a. The supporting text refers to the need for land assembly to maximise the redevelopment opportunities of the site whilst still providing for existing uses.
 - i. What progress has been made on this land assembly and is the site allocation deliverable?
- 6d.34.20 The site is being promoted by the District Council through the Property Services Team who are confident of purchasing all the required site areas and consider the site deliverable.

6d.34.21 The Council does wish to make an amendment to the site boundary to remove one strip of ownership which will not be coming forward for development on the southern boundary. The new boundary does not affect the deliverability of the site. The new boundary is included in Appendix 2.

ii. What existing uses are to remain?

6d.34.20 The policy supporting text 'operational requirements of existing uses' is referring to improvements set out in the policy to the existing pedestrian access from Parsonage Street, and improvements to vehicular access from May Lane. This is to enable existing properties to have continued access to Prospect Place, no other uses will remain.

iii. What operational requirements will need to be retained and provided for and would this impact on any redevelopment opportunities?

6d.34.21 The policy supporting text requires 'operational requirements of existing uses' and is referring to improvements set out in the policy to the existing pedestrian access from Parsonage Street, and improvements to vehicular access from May Lane. This is to enable existing properties to have access to Prospect Place.

b. Can the site viably accommodate existing uses and their operational requirements, residential development and open spaces? What type and amount of open space is envisaged? Are these uses justified?

6d.34.20 As above, the only existing uses to remain are operational requirements for access, which do not make the site unviable.

6d.34.21 Delivery Policy DHC7 sets out comprehensive local open space standards, in terms of quantum and accessibility, by population size, the Council does not consider it necessary to set out detailed site requirements within each site allocation policy.

c. The policy states that heritage assets need to be 'conserved and enhanced' through high quality design, but does not specify which heritage assets this relates to. The supporting text refers to the Dursley Conservation Area, and 'taking account of the site's archaeological potential and its contribution to the setting and significance of nearby listed buildings'.

i. What assessments, if any, have been carried out of the impact of the proposed partial redevelopment and reuse of the site on the significance of these heritage assets? How has this informed the decision to allocate the site and the development requirements?

- ii. Is the approach in the Plan, in this respect, justified and is the wording in the policy consistent with national policy and legislation on the historic environment?

6d.34.20 The policy wording states that “*Particular issues to address include conserving and enhancing heritage assets through high quality design...*”. The Council considers this wording to be consistent with national policy. NPPF Chapter 16 (paragraphs 189-208) is entitled “Conserving and enhancing the historic environment” and covers diverse aspects of positive heritage asset management. National Planning Practice Guidance explains what is meant by the conservation and enhancement of the historic environment (Paragraph: 002 Reference ID: 18a-002-20190723). The Council considers the intent behind Local Sites Allocation Policy PS11 accords particularly with the advice (Paragraph: 003 Reference ID: 18a-003-20190723) that;

“...plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area.”

6d.34.21 Whilst the Council expects that the form of future development here will be guided principally through the site allocation policy, the ‘whole plan’ approach means that more specialist policies, including ES10 (Valuing our historic environment and assets), provide specific criteria to be addressed by developers and considered by decision makers.

6d.34.22 ES10 supporting text (para.6.71) sets out what the Council considers to constitute a heritage asset, including archaeological remains and ranging from sites and buildings of local historic value to those of the highest significance, consistent with national policy (NPPF para. 189). ES10 Criterion 1 requires a heritage statement to be produced for any development proposals involving any one of those things, to ensure the impacts of potential development can be properly considered.

6d.34.23 The Council considers Local Sites Allocation Policy PS28 has usefully signposted the developer to the issues that need to be addressed. Whilst the policy refers only to “heritage assets” in general terms, the supporting text (3.3.17) provides adequate clarification. The text explains that the policy expectation is for development to conserve and enhance heritage assets within the Dursley Conservation Area and it flags up the site’s archaeological potential and likely impact on the setting of adjacent listed buildings. The text sets out an expectation of high quality design, which respects the town’s historic urban grain and vernacular character, including sensitivity from long range views due to major level changes through the site.

6d.34.24 The Council considers this to be effective and justified guidance about what is required from the development in this context and considers that it reflects the Plan’s evidence base. A rigorous site selection process (as evidenced through

Topic Paper – Assessment and selection of sites, October 2021, EB9) has included assessment of potential development impacts on a range of heritage assets across Stroud District and informed the Council’s choice of sites where there is scope for development to bring about the conservation or enhancement of heritage assets.

6d.34.25 This formed a key part of the Strategic Assessment of Land Availability and is evidenced for this site through the SALA Heritage Impact Appraisal 2017 (EB50, pages DUR 7 and DUR 8), which identifies the site’s location adjacent to and partly within the Dursley Conservation Area and its proximity and potential impact on the setting of multiple Grade II listed buildings at Parsonage Street and Prospect Place as key. EB50 also highlights archaeological potential, relating to historic burgage plots and complex back-land development, and identifies that there is only “*limited scope*” for development to deliver positive heritage benefits, but some scope for infill development “*if designed to reflect the town’s historic urban grain and vernacular character*”. EB50 highlights key features of the site and its surroundings that contribute to the character and significance of the conservation areas and other heritage assets identified and advises on how these features might influence the layout, scale and massing of new development.

d. The policy also requires the ‘safeguarding and enhancing of local biodiversity’ but does not provide specific detail on what this relates to. Is the policy requirement suitably clear on what local biodiversity this relates to and is it justified? Or is this issue covered by other Plan policies?

6d.34.26 The policy refers to safeguarding and enhancing local biodiversity due to the current nature of the site being residential gardens. The policy requirements signpost to Delivery policies ES6 Providing for biodiversity and geodiversity, ES7 Landscape character and ES8 Trees, hedgerows and woodlands set out the development management policy framework for the detailed consideration of biodiversity and landscaping provision at the planning application stage to deliver high quality sustainable development in accordance with Local Site Allocation Policy PS28 requirements.

e. The supporting text refers to long views and the need for sensitive design. Is this in relation to heritage assets or the surrounding area more generally? Is this justified and if so, does it need to be specifically set out in the policy or is it covered by other Plan policies?

6d.34.27 The supporting text is signposting to Delivery Policy ES10 Valuing our historic environment and assets.

Matter 6e Gloucester's rural fringe site allocations

Local Sites Allocation Policy HAR017 Land at Sellars Road, Hardwicke

35. The site is allocated for up to 10 dwellings and open space uses.

a. Does the policy clearly set out what type and level of open space uses would be required or is this covered by other policies? Is this requirement justified?

6e.35.20 Local Sites Allocation Policy HAR017 identifies a policy requirement for open space uses as an integral part of residential development to be approved at the masterplan stage as part of a future planning application.

6e.35.21 Delivery Policy DES2 Green Infrastructure (GI) provides the detailed development management framework for the consideration of open space provision in association with new development, justified by the evidence base and the robust assessment of GI across the district detailed in the Stroud Open Space, GI and Recreation Study 2019 (EB41).

6e.35.22 Part 2 of the study for the Gloucester Fringe (EB41h), provides a qualitative review of GI assets within the Gloucester Fringe, including Hardwicke, and sets out the quantity requirements, by typology, for open space provision from new residential development alongside the identification of local opportunities to enhance GI provision.

b. The policy requires particular issues to be addressed, including integration with surrounding land uses, undertaking a precautionary archaeological evaluation and surface water management. Are these requirements clear and are they justified? Or are such issues covered by other Plan policies?

6e.35.20 The policy identifies the site issues to address at the masterplan stage, as part of a future planning application, to deliver high quality sustainable development having regard to potential impacts identified throughout the Local Plan review.

6e.35.21 The supporting text sets out how high-quality sustainable development will be achieved, informed by the evidence base; in particular SALA site assessment HAR017 (EB22c) and accompanying SALA Heritage Impact Appraisal 2020 (EB53). Specifically, protecting the setting of the Gloucester and Sharpness Canal, retaining a sense of transition between the countryside and the urban edge and softening landscape impacts through the retention of trees and hedgerows to integrate development with surrounding uses. Further justification for this approach is set out in the Summary of Regulation 20 responses to the Pre-Submission Draft Plan PART 1: Site Allocations (SLP-01a).

6e.35.22 Delivery Policies ES4 Water resources, quality and flood risk, ES10 Valuing our historic environment and assets and ES12 Better design of places set out the development management policy framework for the detailed consideration of the

design of development, archaeological evaluation and protection and surface water drainage at the planning application stage to deliver high quality sustainable development in accordance with Local Site Allocation Policy HAR017 requirements.

- 6e.35.23 The Council considers this is a justified, suitably clear and consistent approach to all local site allocations identified in the Plan.
- c. Reference is made in the supporting text to conserving the setting of the adjacent canal and to retain trees and hedgerows. In relation to the canal towpath it adds that there are opportunities to improve pedestrian and cycle linkages. Are these justified and if so, should they be made explicit within the policy as requirements, or are they covered by other Plan policies?
- 6e.35.24 As explained in response to the previous question, the policy identifies the site issues to address at the masterplan stage, as part of a future planning application, to deliver high quality sustainable development having regard to potential impacts identified throughout the Local Plan review.
- 6e.35.25 The supporting text sets out how high-quality sustainable development will be achieved, informed by the evidence base; in particular SALA site assessment HAR017 (EB22c) and accompanying SALA Heritage Impact Appraisal 2020 (EB53). The retention of existing trees and hedgerows and the opportunity to improve pedestrian and cycle linkages to the Gloucester and Sharpness Canal towpath are important elements in the integration of the site with adjoining land uses required by the policy.
- 6e.35.26 Delivery Policies ES8 Trees, hedgerows and woodlands and ES11 Maintaining, restoring and regenerating the District's canals set out the development management policy framework for the detailed consideration of landscaping proposals, including the retention of existing trees and hedgerows, and improving access to and along the canals to encourage use for transport, leisure and recreation purposes at the planning application stage to deliver high quality sustainable development in accordance with Local Site Allocation Policy HAR017 requirements. The Council will continue to work with the Canals and Rivers Trust (CRT) to ensure opportunities to improve pedestrian and cycle linkages are taken in accordance with Delivery Policy ES11 requirements.
- 6e.35.27 The Council considers this is a justified, suitably explicit and consistent approach to all local site allocations identified in the Plan.

Strategic Site Allocation Policy PS30 Hunts Grove Extension

36. The site is allocated as an extension to the existing Hunts Grove development. It is proposed to 'deliver an additional 750 dwellings, including 225 affordable dwellings (unless viability testing indicates otherwise)'. The policy seeks a comprehensive masterplan which demonstrates how the

extension will be integrated into the Hunts Grove new community and lists 13 requirements.

- a. Are all the 13 listed requirements justified by robust evidence, are they sufficiently clear in their detail and do they all relate to the site allocation? Do any requirements duplicate other Plan policies and if so, why?

6e.36.20 Strategic Site Allocation Policy PS30 includes within it 13 criteria which will need to be satisfied in order to achieve a successful development. The criteria have been put together having regard to a range of evidence based studies, many based upon infrastructure needs identified in the Infrastructure Delivery Plan (IDP) (EB69 and EB110).

6e.36.21 The approach of the SDLP is for matters of broad policy and principle to be set out within Core Policies and for more specific policy to be provided through the various delivery policies set out in the SDLP. In this case, the Site Allocation Policy PS30 contains strategic requirements or signposts to consider the more detailed matters which are covered elsewhere in the Detailed Delivery policies. The Council does not consider there is any duplication between the Site Allocation Policies and the more detailed Delivery Policies and the SDLP is sound in this regard.

- b. The map for the site on page 146 of the Plan provides 'indicative information'. The local centre, primary school and safeguarded area for potential future rail halt, are all shown as being outside the site allocation, and are instead within the wider Hunts Grove development. However, these are listed as requirements to be addressed in the masterplan for the Hunts Grove extension. Can the Council provide clarification on this?

6e.36.20 The policy requires development to be brought forward as an extension to the approved Hunts Grove masterplan and will include provisions that support and supplement the approved scheme. There may be opportunities to re-examine some of the masterplanning principles that relate to the approved scheme, as part of the masterplanning of the proposed extension. It is not expected for all of the uses in the policy to therefore be provided within PS30, the Council concedes this may not be as clear as it could be.

- c. The provision of 225 affordable houses is subject to viability testing. Is this approach justified, does it correspond with Core Policy CP9 on affordable housing, and is it consistent with national policy? Has the affordable housing provision for this site been viability tested?

6e.36.21 The site has been viability tested through EB111 Stroud Local Plan Viability Assessment 2022 Refresh Report (August 2022) and EB70 Draft Local Plan Viability Assessment (May 2021). As PS30 is an extension to the 2015 allocation and is to include provisions that support and supplement the approved scheme,

the additional viability testing has been included to match the existing allocation wording. The Council considers this is consistent with CP9 and national policy, but if the Inspectors consider it is not consistent, the Council will consider a modification.

- d. Some of the representations include suggested modifications to the policy wording, particularly in relation to criteria 10 and 12. Another includes a suggested new criterion on appropriate mitigation measures or replacement green infrastructure to safeguard the AONB from development pressure. Are any of these suggested modifications necessary for soundness?

6e.36.22 The Council does not consider the suggested modifications to further safeguard the AONB from development pressure are required. The SDLP contains robust policies including DES2 Green Infrastructure and ES7 Landscape character. AONB is also awarded the highest status of protection in the NPPF.

- e. Some representors raise other concerns relating to the development of the site, including the impact of additional traffic, the loss of green space and the effect on local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?

6e.36.23 The Council considers that other issues relating to the development of the site have been suitably assessed as part of the process to allocate this site.

6e.36.24 Topic Paper: Assessment and selection of sites topic paper (EB9) sets out in detail the site selection process at each stage of the Local Plan review and how this has been suitably informed by evidence base studies, Sustainability Appraisal (SA) and representations received through Regulation 18 and Regulation 19 public consultation on the emerging Local Plan.

6e.36.25 Consultation reports for the Pre-Submission Plan (SLP-01a) and Draft Plan 2019 (CD4d) set out the concerns highlighted by representations and detail the Council's response to the issues raised.

Employment Allocation Policy PS32 Quedgeley East Extension

37. The site is 5 hectares in size and is allocated as an extension to the Quedgeley East Business Park, for office, B2 and B8 employment uses. The policy also requires a strategic landscape buffer along the south-eastern edge of the development.

- a. Is an extension to the existing employment site in this location, and with the specified uses, justified by robust evidence?

6e.37.1 The Gloucestershire Economic Needs Assessment (EB29, para. 0.22) makes clear that interest in industrial space in Gloucestershire is focussed primarily along

the M5 corridor, including at J12 within Stroud District. J12 of the M5 in Stroud District is also an attractive location for B8 uses (para. 6.38). J12 provides a business park type offer which is a popular location (para. 6.162).

6e.37.2 The NPPF makes clear that “planning policies and decisions should recognise and address the specific locational requirements of different sectors. The area adjacent to M5 J12 contains two of the District’s key employment sites – EK14 Javelin Park and EK15 Quedgeley Trading Estate East and the adopted Local Plan has allocated a 13 hectares site Land at Quedgeley East (Policy SA4a) for B1-B8 uses, which is now substantially built out. The sites contain a mix of industrial and distribution uses with ancillary office uses.

6e.37.3 The proposed extension to Quedgeley East set out within Policy PS32 will therefore make a significant contribution to the employment needs of the District in a popular location for the sectors identified and with demonstrable market interest.

b. As regards the strategic landscape buffer, is the Plan sufficiently clear about what would be expected to be delivered within the site or is this covered by other Plan policies?

6e.37.4 The supporting text at para. 3.4.12 makes clear that development will need to ensure 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 Cotswolds AONB escarpment. The exact details of the landscape buffer will depend upon detailed LVIA and other assessment work at the planning application stage.

c. The policy requires sustainable transport measures and necessary highway improvements. What specifically would the development need to provide, are they justified and would they be viable?

6e.37.5 The Sustainable Transport Strategy (STS) (EB60a-c and EB108) and the Traffic Forecasting Report (TFR) (EB61 and EB108) set out the expected interventions at all of the strategic allocations to address transport requirements.

d. Some of the representations raise concerns about other issues relating to the development of the site, including the protection of ancient trees and the impact on the environment and local character. Have such factors been suitably assessed as part of the process to allocate this site?

6e.37 Delivery Policy ES8 seeks, where appropriate, the enhancement and expansion of the District’s tree, hedgerow and woodland resource. Development that would result in the unacceptable loss or damage to, or threaten the continued wellbeing of locally valued and/or protected trees, hedgerows, community orchards, veteran trees or woodland will not be permitted.

- 6e.37 These landscape elements make an important contribution to the beauty, diversity and distinctiveness of the District. Delivery policy ES7 Landscape character sets out the development management policy framework for the detailed consideration of landscaping provision at the planning application stage to deliver high quality sustainable development in accordance with Local Site Allocation Policy PS32 requirements.

Employment Allocation Policy PS43 Javelin Park

38. The site is 27 hectares in size and is allocated as an extension to the key employment site EK14 Javelin Park for office, B2 and B8 employment uses. The policy also requires a strategic landscape buffer along the western, southern and eastern boundaries of the development.
- a. Is an extension to the existing employment site in this location, and with the specified uses, justified by robust evidence?
- 6e.38.1 The Gloucestershire Economic Needs Assessment (EB29, para. 0.22) makes clear that interest in industrial space in Gloucestershire is focussed primarily along the M5 corridor, including at J12 within Stroud District. J12 of the M5 in Stroud District is also an attractive location for B8 uses (para. 6.38). J12 provides a business park type offer which is a popular location (para. 6.162). There is an active market in the area and three industrial/warehouse units have recently come forward at J12 comprising 40,000 sqft, 52,000 sqft, and 54,000 sqft (para.6.85).
- 6e.38.2 The NPPF makes clear that “planning policies and decisions should recognise and address the specific locational requirements of different sectors. The area adjacent to M5 J12 contains two of the District’s key employment sites – EK14 Javelin Park and EK15 Quedgeley Trading Estate East and the adopted Local Plan has allocated a 13 hectares site Land at Quedgeley East (Policy SA4a) for B1-B8 uses, which is now substantially built out. The sites contain a mix of industrial and distribution uses with ancillary office uses.
- 6e.38.3 The proposed extension to Javelin Park set out within Policy PS43 will therefore make a significant contribution to the employment needs of the District in a popular location for the sectors identified and with demonstrable market interest.
- b. As regards the strategic landscape buffer, is the Plan sufficiently clear about what would be expected to be delivered within the site or is this covered by other Plan policies?
- 6e.38.4 The supporting text at para. 3.4.13 makes clear that development will need to include 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 Cotswolds AONB escarpment. The exact details of the landscape buffer will depend upon detailed LVIA and other assessment work at the planning application stage.

- c. The policy requires sustainable transport measures and necessary highway improvements. What specifically would the development need to provide, are the requirements justified and would they be viable and deliverable?

- 6e.38.5 The Sustainable Transport Strategy (STS) (EB60a-c and EB108) and the Traffic Forecasting Report (TFR) (EB61 and EB108) set out the expected interventions at all of the strategic allocations to address transport requirements. In the case of Javelin Park, the STS assumes an indicative 10% reduction in development trips to be achieved via a public transport connection to / from Gloucester. The STS refers to the new park and ride proposed by GCC through GLTP4 at J12 as a planned strategic intervention, although the details are not known as yet. The policy identifies the need for the site to provide sustainable transport measures and that could take the form of contributions to the Park and Ride or to another bus service or other active travel measures to deliver the 10% reduction.
- 6e.38.6 In terms of highway mitigation measures, the TFR and Funding and Delivery Plan (EB109) identifies the need for the site to make a proportionate contribution to the M5 J12 mitigation package and to fund the dualling of the B4008 which is as a result of the significant increase in scale of the proposed Javelin Park allocation between Draft Plan and SDLP stages. Due to the nature of the strategic modelling assessment applied to the SDLP allocations, it has been necessary to assume a generic mix of employment types within the modelling, which includes office space. If the type of development which comes forwards is predominantly B2 and/or B8, as might be expected in proximity to a motorway junction, the level of traffic generated would be significantly reduced, lessening the level of mitigation needed. Thus it may be that the development management process determines that the dualling is not required and/or that mitigation can be delivered through enhanced sustainable transport measures, such as improved bus service connections.
- 6e.38.7 The Council's Viability Assessment 2022 Refresh Report (EB111) has run a set of development financial appraisals for non-residential development types, although a site specific appraisal has not been carried out for the PS43 allocation. Larger industrial and distribution sites are shown as viable on the greenfield sites, which is consistent with such delivery being delivered, particularly in the north of the District (para. 11.6).
- 6e.38.8 The site promoter is actively supporting the allocation of this site (CD5b, Rep.609) and has submitted a planning application which is awaiting positive confirmation of the allocation of the site, before being determined. The site promoter states that "Employment Allocation PS43 is deliverable over the plan period. Indeed, occupier interest is such that half of the allocation will be developed upon planning permission being granted. It will contribute to the plan being effective in meeting the strategic delivery of employment land, Employment Allocation Policy PS43 Javelin Park is a sound policy and enables the whole plan to be considered sound." (para. 5.5 and 5.9).

- d. The supporting text refers to development minimising 'potential visual impacts upon the heritage assets and their immediate settings at adjacent Haresfield' and the AONB, but these are not set out in the policy.
 - i. What is the significance of these heritage assets and has any assessment been carried out to determine what the potential impacts of development would be in this regard?

6e.38.9 The Council's SALA Heritage Assessment 2019 screened out the site due to the lack of any designated heritage assets on site and the site being well-removed from any designated heritage assets (heritage assets at Haresfield Court lie some 900m to the east and listed buildings at Little Haresfield some 650m to the south). The Assessment of Strategic Development Opportunities in Parts of Gloucestershire (EB17d) makes reference to a number of heritage assets in the broad locality (including landmark Grade II* listed Harefield Church and the Haresfield Hill SAM) but concludes "The least sensitive part of the assessment area therefore appears to be the western stretch immediately adjacent to the M5" (Appendix 2b, Area 40). Whilst the assessment work to date has not identified a significant impact on heritage assets, there is potential for a poorly designed large development to impact on longer distance views and therefore it is legitimate to refer to this potential issue in the supporting text.

Why is a requirement to conserve the significance of these heritage assets and their settings not identified within the policy? Is this suitably set out in other Plan policies? Is the wording in the supporting text consistent with national policy on the historic environment?

6e.38.10 The policy sets out the requirement for a strategic landscape buffer which is a site specific requirement and therefore identified within the policy. Detailed policy requirements relating to assessing and mitigating any potential impacts on the AONB and heritage assets are set out in Delivery Policies ES7 and ES10 respectively.

- ii. Has the impact of development within this site, in relation to the AONB, been robustly considered and is this clearly set out in the Plan?

6e.38.11 The Assessment of Strategic Development Opportunities in Parts of Gloucestershire (EB17d) identifies that landscape sensitivity was moderate-high for the small-large village scenarios in the broad area at Haresfield and does refer to overlooking from the adjacent escarpment within the Cotswolds, although this site is at the western extremity of the area and adjacent to the incinerator and other employment uses (Appendix 2b, Area 40).

6e.38.12 Whilst the principle of site allocation is not subject to an objection from either Natural England not the AONB Natural Landscapes Board, Natural England has raised objections to the current planning application, citing concerns regarding building heights, materials and colour and the extent to which the landscaping

constitutes a strategic buffer. As the policy and supporting text refer to both design and a strategic landscape buffer, the Council considers the policy identifies the appropriate issues for applicants to address.

- e. Some of the representations raise concerns about other issues relating to the development of the site, including the effect of additional traffic and the impact on the environment and local character. Have such factors been suitably assessed as part of the process to allocate this site?

6e.38.13 The Council considers that other issues relating to the development of the site have been suitably assessed as part of the process to allocate this site. Topic Paper: Assessment and selection of sites (EB9) sets out in detail the site selection process at each stage of the Local Plan review and how this has been suitably informed by evidence base studies, Sustainability Appraisal (SA) and representations received through Regulation 18 and Regulation 19 public consultation on the emerging Local Plan. Consultation reports for the Pre-Submission Plan (SLP-01a) and Draft Plan 2019 (CD4d) set out the concerns highlighted by representations and detail the Council's response to the issues raised.

Strategic Site Allocation Policy G1 South of Hardwicke

- 39. The site is identified as an urban extension to Hardwicke and is allocated as a strategic housing development, including residential and community uses. The policy seeks a development brief incorporating an indicative masterplan which 'will address' 20 policy criteria. The site is proposed to include approximately 1,350 dwellings.
 - a. Are the 20 criteria justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective? Do some criteria unnecessarily repeat other Plan policies?

6e.39.1 G1 is an extension to Hardwicke tier 3a settlement and adjacent to Hunts Grove tier 2 settlement. Strategic Allocation Policy G1 includes within it 20 criteria which will need to be satisfied in order to achieve a high quality sustainable development. The criteria have been put together having careful regard to a range of evidence based studies, many based upon infrastructure needs identified in the Infrastructure Delivery Plan (IDP) (EB69 and EM110). The IDP has involved collaborative discussions with infrastructure providers and site promoters with requirements identified by sector and by strategic site. There is a clear signpost to addressing identified constraints and recommendations referred to in the IDP in the policy G1.

- b. Whilst the policy includes the development of a local centre and educational and healthcare provision or contributions, there appears to be no provision for other employment uses. Is this because such

facilities are within close proximity and if so, what are the walking distances to such facilities from within the site?

6e.39.2 There is no provision for employment opportunities because such facilities are within close proximity. With reference to Delivery Policy E11 – Key Employment sites both key identified key sites EK12 Quedgeley West and EK13 Hunts Grove/Quadrant Distribution Centre are in close proximity. Taking the centre point of the allocation site Quedgeley West Business Park is 535 metres away with a walking time of approximately 6 minutes). Again from the centre point of the allocation site G1 Hunts Grove/Quadrant Distribution Centre is about 1500m away which is a walking time of about 15 minutes. These distances and walking timings are considered reasonable to access employment opportunities.

c. Have impacts of the development on existing infrastructure been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?

6e.39.3 The impacts of the development on existing infrastructure been suitably assessed. The strategic site allocation policy G1 set out all necessary infrastructure improvements and requirements and are set out clearly within the policy criteria. All have been put together having careful regard to a range of evidence-based studies, many based upon infrastructure needs identified in the Infrastructure Delivery Plan (IDP) (EB69 and EM110). The IDP has involved collaborative discussions with infrastructure providers and site promoters with requirements identified by sector and by strategic site. There is a clear signpost to addressing identified constraints and recommendations referred to in the IDP within the policy G1 criteria. The Council consider the infrastructure requirements are justified by evidence and accord with the NPPF Paragraph 11a that states all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area and align growth and infrastructure.

d. Some of the representations raise concerns about other issues relating to the development of the site, including environmental impact . Have such factors been suitably assessed as part of the process to allocate this site?

6e.39.4 The Council considers that other issues relating to the development of the site have been suitably assessed as part of the process to allocate this site.

6e.39.5 Topic Paper: Assessment and selection of sites topic paper (EB9) sets out in detail the site selection process at each stage of the Local Plan review and how this has been suitably informed by evidence base studies, Sustainability Appraisal (SA) and representations received through Regulation 18 and Regulation 19 public consultation on the emerging Local Plan.

6e.39.6 Consultation reports for the Pre-Submission Plan (SLP-01a) and Draft Plan 2019 (CD4d) set out the concerns highlighted by representations and detail the Council's response to the issues raised.

Strategic Site Allocation Policy G2 Land at Whaddon

Further to our previous questions under Matter 3 on meeting Gloucester City's unmet housing need and whether the principle of this site allocation as safeguarded land is soundly based, we have the following additional questions on the specific details within the policy.

40. The site is proposed to be 'safeguarded' to meet future housing needs of Gloucester City, if required. The policy seeks a development brief incorporating an indicative masterplan, that will address 22 listed requirements. This includes the provision of at least 3,000 dwellings, 8 serviced plots for travelling showpeople and necessary infrastructure.
- a. If this is proposed as a safeguarded site and a decision on whether it would be allocated for development would be made through a future review of the Plan, why is it necessary at this stage to set out specific requirements for the site?
 - b. Are all the 22 listed requirements justified by up to date robust evidence and are they sufficiently clear and effective in their level of detail? Do any duplicate other Plan policies and if so, why?

6e.40.1 Strategic Allocation Policy G2 Brookthorpe with Whaddon includes within it 22 criteria which will need to be satisfied in order to achieve a high quality sustainable development. The criteria have been put together having careful regard to a range of evidence-based studies, many based upon infrastructure needs identified in the Infrastructure Delivery Plan (IDP) (EB69 and EM110).

6e.40.2 The IDP has involved collaborative discussions with infrastructure providers and site promoters with requirements identified by sector and by strategic site. The strategic site allocation policy G2 set out all necessary infrastructure improvements and requirements and are set out clearly within the policy criteria. There is a clear signpost to addressing identified constraints and recommendations referred to in the IDP within the policy G2 criteria. The Council consider the infrastructure requirements are justified by evidence and accord with the NPPF Paragraph 11a that states all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area and align growth and infrastructure.

- c. Have all site constraints and development impacts been robustly assessed, particularly as regards highways and opportunities for sustainable modes of transport?

6e.40.3 Topic Paper: Assessment and selection of sites topic paper (EB9) sets out in detail the site selection process at each stage of the Local Plan review and how this has been suitably informed by evidence base studies, Sustainability Appraisal

(SA) and representations received through Regulation 18 and Regulation 19 public consultation on the emerging Local Plan.

- 6e.40.4 Consultation reports for the Pre-Submission Plan (SLP-01a) and Draft Plan 2019 (CD4d) set out the concerns highlighted by representations and detail the Council's response to the issues raised.
- 6e.40.5 All site constraints and development impacts been robustly assessed, having careful regard to a range of evidence-based studies, many based upon infrastructure needs identified in the Infrastructure Delivery Plan (IDP) (EB69 and EM110).
- 6e.40.6 Transport issues have been considered from the earliest stage of plan making, including to ensure that opportunities to promote walking, cycling and public transport are identified and pursued. This is in line with NPPF Paragraph 104. Working through the Transport Group, the Council initially prepared a Strategy Options Transport Discussion Paper (EB59/60) to examine the transport implications of the four initial spatial options. This work supported the development of a spatial strategy based on concentrated growth. Following work to identify suitable sites, the transport infrastructure requirements have been identified through the Sustainable Transport Strategy (STS) (EB60a-c and EB108) and the Traffic Forecasting Report (TFR) (EB61 and EB108) which form part of the evidence base for the SDLP.
- 6e.40.7 The STS sets out the strategic approach to sustainable transport for the Plan. This includes identifying specific items required to deliver strategic site allocations, as well as guiding the approach to mitigation to be determined through the development management process for sites dependent on their scale and location. The TFR has taken account of sustainable transport measures at the strategic site allocations and then assessed the transport impacts of cumulative growth in terms of the scale and location of proposed development and identifying highway mitigation requirements. The highways infrastructure requirements are set out in the TFR and are demonstrated to be appropriate to mitigate the proposed development within the SDLP. The updated site policies in the STS Addendum (EB108 p.15 onwards) align with the relevant allocation policies within the Plan.
- d. Are necessary infrastructure requirements and mitigation measures proposed within the policy and would these ensure the development was sustainable, particularly in terms of travel modes?
- 6e.40.8 The impacts of the development on existing infrastructure been suitably assessed. The strategic site allocation policy G2 set out all necessary infrastructure improvements and requirements and are set out clearly within the policy criteria. All have been put together having careful regard to a range of evidence-based studies, many based upon infrastructure needs identified in the Infrastructure Delivery Plan (IDP) (EB69 and EM110). The IDP has involved collaborative discussions with infrastructure providers and site promoters with requirements identified by sector and by strategic site. There is a clear signpost to addressing

identified constraints and recommendations referred to in the IDP within the policy G2 criteria.

- 6e.40.9 Following work to identify suitable sites, the transport infrastructure requirements have been identified through the Sustainable Transport Strategy (STS) (EB60a-c and EB108) and the Traffic Forecasting Report (TFR) (EB61 and EB108) which form part of the evidence base for the SDLP. The STS sets out the strategic approach to sustainable transport for the Plan. This includes identifying specific items required to deliver strategic site allocations, as well as guiding the approach to mitigation to be determined through the development management process for sites dependent on their scale and location.
- 6e.40.10 The TFR has taken account of sustainable transport measures at the strategic site allocations and then assessed the transport impacts of cumulative growth in terms of the scale and location of proposed development and identifying highway mitigation requirements including a range of travel modes. The highways infrastructure requirements are set out in the TFR and are demonstrated to be appropriate to mitigate the proposed development within the SDLP.
- 6e.40.11 The purpose of the Transport Funding and Delivery Plan (F&DP, EB109) and regular engagement with the relevant authorities through the Stroud Transport Group and other strategic transport meetings, has been to make progress on the funding and delivery of strategic infrastructure projects to ensure that there is a reasonable prospect of the timely delivery of strategic infrastructure requirements.
- 6e.40.12 The Council consider the infrastructure requirements are justified by evidence and accord with the NPPF Paragraph 11a that states all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area and align growth and infrastructure
- e. Has the boundary been correctly drawn on the maps within the Plan (pages 155 and 160) and on the policies map?
- 6e.40.13 The boundary been correctly drawn on the maps within the Plan (pages 155 and 160) and on the proposed strategic allocation policies map indicated in Appendix D.
- f. Some representors raise other concerns relating to the development of the site, including the impact on wildlife, flooding and the character of the area and the recreational pressures on the AONB. Have such factors been suitably assessed as part of the process to allocate/safeguard this site?
- 6e.40.14 Topic Paper: Assessment and selection of sites topic paper (EB9) sets out in detail the site selection process at each stage of the Local Plan review and how this has been suitably informed by evidence base studies, Sustainability Appraisal (SA) and representations received through Regulation 18 and Regulation 19 public consultation on the emerging Local Plan.

- 6e.40.15 JBA Consulting undertook a Level 2 assessment of all strategic site options identified for potential allocation within the emerging Stroud Local Plan. The Council has undertaken detailed flood risk assessment work available at EB54 – EB54 a-II (inclusive).
- 6e.40.16 Consultation reports for the Pre-Submission Plan (SLP-01a) and Draft Plan 2019 (CD4d) set out the concerns highlighted by representations and detail the Council's response to the issues raised. A heritage and archaeological Heritage Impact Assessment is provided in the evidence base (EB120) and has been agreed with Historic England.
- 6e.40.17 In conclusion the Council considers that issues relating to the development of the site listed above have been suitably assessed as part of the process to allocate this site.

g. The site does not form part of the housing trajectory. If the site was found to be required to meet unmet housing needs, what would be its delivery timeframe and would this be realistic?

- 6e.40.18 If the site were to be allocated in the SDLP, the Council envisages that the site will start delivering housing in 2024/25 with completion by 2039/40. These assumptions are based on discussions with site promoters. The SDLP Policy G2 includes a mechanism for allocation on approval/ adoption of the JCS Review (now known as JSP). However, it was the Council's expectation that the principle would have been established by 2023, allowing for a modification to remove this mechanism and to allocate the site. That position remains the Council's approach. However, if the JSP authorities cannot demonstrate unmet needs, nor sufficient progress with their development strategy, then the Council will accept a modification releasing the site through the development management process in the event that the adopted JSP identifies the site as required to deliver its development strategy, after the Stroud Local Plan has been adopted. The only other option would be for the SDLP to remove Land at Whaddon as a site and for the matter to be delayed for consideration through a future Stroud Local Plan review process once the JSP has been adopted. As is discussed above, this is likely to exacerbate unmet needs and would not meet the policy requirements set out in the adopted Stroud Local Plan nor the adopted JCS.

Matter 6f The Berkeley cluster site allocations

Local Sites Allocation Policy PS33 Northwest of Berkeley

41. The site is allocated for approximately 110 dwellings and associated open space uses and strategic landscaping along the northern and eastern boundaries, to provide an extension to Berkeley.
- a. Does the policy clearly set out what type and level of open space uses and strategic landscaping would be required or is this covered by other policies? Are the requirements justified?
 - b. How will development be required to minimise landscape impacts, safeguard and enhance local biodiversity and provide new and enhanced footpath and cycle links? What are the specific requirements, are they justified and do they need to be made clear in the policy or are such issues covered by other Plan policies?
 - c. The policy states that development should not increase flood risk on or off site. The supporting text refers to flood risk attenuation and enhancements. Do specific flood risk requirements need to be set out in this policy or are such matters covered by other Plan policies?
 - d. Some of the representations raise concerns about other issues relating to the development of the site, including increased traffic impact and the availability of local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?

- 6f.41.1 This site has full permission granted June 2022 for 107 dwellings, conditions have been formally discharged, and the development has commenced. The Council would like to make a modification to remove as an allocation and allocate as a commitment.

Local Sites Allocation Policy BER016/017 Land at Lynch Road, Berkeley

42. The site is allocated for up to 60 dwellings and open space.
- a. What type and level of open space would be required or is this covered by other policies?

- 6f.42.1 Local Sites Allocation Policy BER016/017 identifies a policy requirement for open space uses as an integral part of residential development to be approved at the masterplan stage as part of a future planning application.

- 6f.42.2 Delivery Policy DES2 Green Infrastructure (GI) provides the detailed development management framework for the consideration of open space provision in association with new development based on a robust assessment of GI across

the district detailed in the Stroud Open Space, GI and Recreation Study 2019 (EB41).

- b. How will development be required to include structural landscaping to integrate the development into the landscape? What are the specific requirements, are they justified and do they need to be made clear in the policy or is this covered by other Plan policies?

6f.42.3 Delivery policies ES6 Providing for biodiversity and geodiversity, ES7 Landscape character and ES8 Trees, hedgerows and woodlands set out the development management policy framework for the detailed consideration of biodiversity and landscaping provision at the planning application stage to deliver high quality sustainable development in accordance with Local Site Allocation Policy BER016/017 requirements.

- c. The policy states that development should not increase flood risk on or off site. The supporting text seeks to 'ensure no adverse impacts on the adjacent watercourse and area subject to flooding'. Do specific flood risk requirements need to be set out in this policy or are such matters covered by other Plan policies?

6f.42.4 The Council considers this matter are set out in Delivery Policy ES4 Water resources, quality and flood risk.

- d. Some of the representations raise concerns about other issues relating to the development of the site, including increased traffic impact and the availability of local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?

6f.42.5 The Council considers that other issues relating to the development of the site have been suitably assessed as part of the process to allocate this site.

6f.42.6 Topic Paper: Assessment and selection of sites topic paper (EB9) sets out in detail the site selection process at each stage of the Local Plan review and how this has been suitably informed by evidence base studies, Sustainability Appraisal (SA) and representations received through Regulation 18 and Regulation 19 public consultation on the emerging Local Plan.

6f.42.7 Consultation reports for the Pre-Submission Plan (SLP-01a) and Draft Plan 2019 (CD4d) set out the concerns highlighted by representations and detail the Council's response to the issues raised.

Strategic Site Allocation Policy PS34 Sharpness Docks

- 43. The site is allocated for mixed development, including an area of 7 ha for dock uses and dock related industries in Sharpness Docks South and a mix

of housing (up to 300 dwellings), tourism, leisure and recreational uses in Sharpness Docks North.

- a. Are the 14 criteria under a) and b) of the policy and the two additional requirements relating to the disused rail line and the protection of the SAC/SPA/Ramsar site, justified by robust evidence? Are they sufficiently clear in their detail and is the policy wording effective? Do some criteria unnecessarily repeat other Plan policies?

6f.43.1 The 14 criteria set out in Strategic Site Allocation Policy PS34 and additional two requirements set out the principal criteria for the delivery of the allocation. These mirror those in the adopted local plan under Policy SA5. They emerged through the previous plan process and were the subject of assessment through the examination process and found sound. The current allocation was underpinned by appropriate evidence on technical matters which was used to inform the parameters of the allocation and the requirements of the development to be delivered. The criteria set out in the PS34 focus on matters such as quantum of development, protection of the natural & historic environment, connectivity and infrastructure requirements. These are usual parameters to seek to set out in a site allocation policy and are relevant to the constraints of the site and evidence on its capacity. The format of the policy and criteria reflect the structure of the SDLP policies as a whole and whilst there are individual development management policies which provide detail on particular topics, the Council considers that each strategic site policy should contain a summary of the site specific requirements for clarity and for the delivery of each site to be effective.

6.43.2 Since the adoption of the Local Plan in 2015, the Canal and River Trust (the Trust) have submitted an outline planning application (S.17/0798/OUT) and undertaken further technical work. The application is expected to be considered by the Council's Development Control Committee in April 2023 or shortly afterwards. Without prejudicing the future decision of the Local Planning Authority, the remaining technical issues are in the process of being resolved. The Council considers that nothing has fundamentally changed to the national or local policy framework since the Local Plan Inspector determined in 2015 that "Overall, the proposal would achieve a sustainable development, bringing social and economic benefits, meeting the need for jobs and homes, with improved public transport, enhanced accessibility and facilities as a direct result of the development; it would also make effective use of under-used assets to create wealth, conserve and enhance conservation and the historic environment, and improve community well-being, in line with the NPPF. In essence, it is a special case to provide a bespoke solution to a unique opportunity to regenerate Sharpness Docks, which the Local Plan should reflect and support." (Inspector's Report, para. 132) (EB115).

- b. Has the impact of this development proposal on the Severn Estuary SAC/SPA/Ramsar site been suitably assessed as part of the process to allocate this site? Is it clear what avoidance and mitigation measures may be necessary?

- 6f.43.3 The Council's Habitats Regulation Assessment (EB85, page 4) has ruled out the potential for significant effects relating to the loss of supporting habitat/ functionally-linked land for the Severn Estuary SAC/SPA/Ramsar site from Sharpness Docks (and associated urban effects, recreation and water issues). Mitigation measures embedded within the policy and supporting text are identified to address the scale of risk. These measures are to be resolved through site design and project level HRA.
- 6f.43.4 The position of the site in relation to the European protected sites in the Severn Estuary has been a key focus for the Trust in developing the proposals. The Trust contributed to the preparation of the visitors' study which is referenced in the current site allocation policy. The planning application is supported by detailed assessment of the site and its surroundings and potential impacts on the Severn Estuary SAC/SPA/Ramsar site through the Environmental Impact Assessment which supports the planning application. This work has been subject to discussion and agreement with Stroud District Council. The detailed assessment has also been reviewed by Natural England and they have not objected to the scheme as proposed in the planning application.
- 6f.43.5 The assessments demonstrate that the Severn Estuary SAC/SPA/Ramsar site can be protected in the proposed development of the site. Specific measures have been agreed between the Trust and the Council which include identifying alternative walking routes to reduce pressure of additional visitors along the Severn Estuary footpath; a financial contribution to a SANG being administered by Stroud District Council and a management strategy for the use and maintenance of the 'Island Site' within the development which will include the way the Trust can support visitors to the site and wider canal. The additional work undertaken as part of the current planning application has provided substantial additional evidence which builds on that which underpins the original site allocation in the adopted Local Plan.
- c. Where will local residents access every day local services and facilities, such as schools, shops and healthcare? What are the walking distances to such facilities from within the site?
- 6f.43.6 The Council has assessed the range of facilities and services available at Tier 1-3 settlements, including adjacent Newtown/Sharpness and the town of Berkeley (Settlement Role and Function Studies EB71 and EB72). The latest Study concludes: "Newtown/Sharpness offers a good range of local community services and facilities (post office, primary school and pre-school provision, place of worship, pub, village hall, playing field/sports pitch and equipped play area). Access to key services and facilities elsewhere is surprisingly good, with sub-15 minute average travel times both by car and on foot/by bus to all the key services and facilities except a secondary school, a 6th form/FE college and an A&E/Minor Injuries Unit – all of which are located in Dursley." Detailed measurements of distance and travel time from Sharpness Docks to a range of existing facilities are set out in the SALA Transport Accessibility Assessments (EB112) for site NEW001.

- 6f.43.7 Whilst local services exist in the village of Newton/Sharpness and further local and strategic facilities at nearby Berkeley, it should be noted that further facilities are planned for delivery through the development of the site itself, including employment land, ancillary retail/food and drink at the proposed marinas, additional leisure uses and large areas of publicly accessible space. Further facilities and services, including a secondary school, are planned for at the adjacent Sharpness New Settlement site.
- 6f.43.8 As part of the planning application, the transport assessment has assessed the connectivity between the existing settlement and the development site, including reviewing pedestrian and cycle routes available and the work required to upgrade these to facilitate use as part of the development. Gloucestershire County Council as Highway Authority has confirmed that it is satisfied with the details that have been provided. This work has demonstrated how connectivity between the new development and the existing settlement will be achieved.
- d. Have impacts of the development on existing infrastructure (including J14 of the M5) been suitably assessed and are all necessary infrastructure improvements and requirements justified and set out clearly within the policy?
- 6f.43.9 The criteria have been reviewed having regard to a range of evidence based studies, many based upon infrastructure needs identified in the Infrastructure Delivery Plan (IDP) (EB69 and EB110). The IDP has involved collaborative discussions with infrastructure providers and site promoters, with requirements identified by sector and by strategic site.
- 6f.43.10 The Traffic Forecasting Report (TFR) (EB61 and EB108) and the Sustainable Transport Strategy (STS) (EB60a-c and EB108) demonstrate that the likely impacts on the highway network can be adequately mitigated. However, it is acknowledged that more explicit references to the highway mitigation packages set out in the Funding and Delivery Plan, including the A38 and M5 Junction 14, could be added to the Policy, through appropriate modifications, if required.
- 6f.43.11 The Trust has engaged with relevant technical consultees as part of the planning application in order to ensure that suitable evidence has been provided to support the outline planning application. This has included liaising with National Highways in addressing the potential impacts on M5 Junction 14. National Highways does not object to the planning application. Furthermore, negotiations with the Highway Authority have concluded with agreement on highway mitigation measures to junctions in the vicinity of the site and on the B4066/A38 as well as walking and cycling infrastructure to support the development
- e. Some of the representations raise concerns about other issues relating to the development of the site, including the environmental, heritage and wildlife impacts, access issues, and the presence of minerals and waste infrastructure and ammonium nitrate storage. Have such factors been

suitably assessed and taken into account as part of the process to allocate this site?

- 6f.43.12 The constraints on the site and the surrounding area are well documented and are fully acknowledged in the policy. The existing allocation within the Local Plan was found sound and presented sufficient justification for the policy at the time of adoption. Since then, there has been significant work undertaken to develop the proposals and progress delivery of the site through the planning system. This detailed work has examined specific matters including, environmental, heritage, access, ammonium nitrate storage etc. and this work has confirmed they can be suitably addressed. The detailed technical evidence which supports the planning application and builds on the strategic evidence underpinning the original allocation. Comments raised on environmental, access minerals and waste and ammonium nitrate storage are matters which will be addressed as part of the detailed requirements of a planning application, and the evidence on these matters has been supplied as part of the planning application for the site.
- 6f.43.13 In terms of ammonium nitrate storage and the impact on the development, there has been detailed engagement with the Health & Safety Executive (HSE) over the issue and the agreement on how the development can be delivered within the constraints of the consultation zones. The HSE has not objected to the application and there is agreement with the HSE and the Council that the issue can be managed through a combination of suitably worded conditions and a S106 agreement.
- 6.4.14 To address Gloucestershire County Council's concerns regarding the site containing minerals and waste infrastructure, suitable modifications are being agreed as part of a Statement of Common Ground to introduce wording recognising the presence of the infrastructure at the Docks and including a new sentence to the Policy PS34 stating "Future dock uses and dock-related industrial and distribution uses will not prejudice the efficient and effective operations of safeguarded minerals and waste infrastructure."

Local Sites Allocation Policy PS35 Land at Focus School, Wanswell

44. The site is allocated for up to 70 dwellings and community use and open space, including the retention and enhancement of existing playing pitches and open space. The evidence advises that the education providers of the school on the site are intending to vacate the site.

The policy states that a particular issue to address will include 'considering redevelopment within the context of the adjacent PS36 new settlement to ensure that retained open space meets the specific recreation needs of the wider new community'. The site does not form part of the site allocation for the new settlement, and is not adjacent to the new settlement as allocated in the Plan. We note that the map on page 175 of the Plan shows the site adjacent to what could potentially be 'phase 2' of the new settlement but this separate land is not allocated in this Plan.

- a. What does the term 'considering redevelopment' in this context actually mean? What is actually expected from the development and is this clear in the policy?

6f.44.1 The Council requests that the developer considers redevelopment of PS30 in the wider scope of PS36 and with to regard to good place-making principles considers the context of phase 2 of the new settlement.

6f.44.2 PS30 is to be developed for residential on the brownfield element while retaining and enhancing the existing open space. This should be considered within the wider context of phase 2 which will conceptually wrap around the site. PS35 is not required to provide playing pitches but there is potential for future development of phase 2 to take over the open space element and use for future open space and potential playing pitch requirements.

6f.44.3 It is considered good place-making to ensure PS30 has regard to this at the development management stage and holds discussions with promoters of PS36 to ensure that if required, the open space of PS30 is retained and available to provide improved facilities through phase 2.

- b. Can the Council please clarify the site's relationship to the proposed new settlement? Is the development of part of this site for housing justified now?

6f.44.4 As set out above, the site is separate and not part of PS36. The site is justified as the Council supports the brownfield redevelopment while also maintaining the current open space, with scope to further develop as sports pitches through phase 2 if required.

- c. Are the existing playing pitches and open space required for the existing community? If so, why are they included in a site allocation for development?

6f.44.5 The open space is not currently in use as sports pitches but have been used for that use in the past. They are not currently required, and it is not a requirement for PS30 to develop them, but there is a requirement to retain the open space for potential uses in phase 2 as set out above.

- d. Does the evidence robustly demonstrate that the existing playing pitches and open space are required for the new settlement? Can the Council point us to this evidence please?

6f.44.6 This is considered to support phase 2 as set out above.

- e. The site is not adjacent to the site allocation for the new settlement, so are the facilities in the best location? How has this been determined? How will future residents access the facilities? If the facilities are

required for the new settlement, why is the land not proposed to be allocated as part of that site?

6f.44.7 See previous answers.

- f. The supporting text to the policy advises that development should be restricted to the footprint of the school buildings and associated brownfield land, but this is not set out in the policy. Should it be and if so is this approach justified?

6f.44.8 The Council considers this justified in the context of keep the current open space element protected if required for phase 2 and still redeveloping an unused brownfield site using the existing footprint.

- g. The policy title is incorrect as it refers to a different site so can the Council amend this?

6f.44.9 Noted.

- h. What 'community uses' are envisaged within the site, are they justified and do they need to be expressly set out in the policy?

6f.44.10 The community uses envisaged are the open space discussed in the policy.

- i. The supporting text also refers to enhancing existing landscaping and planting for local biodiversity. Does this need to be set out in the policy or is this covered by other Plan policies? What would be actually required for the site in this context?

6f.44.11 Delivery policies ES6 Providing for biodiversity and geodiversity, ES7 Landscape character and ES8 Trees hedgerows and woodlands set out the development management policy framework for the detailed consideration of biodiversity and landscaping provision at the planning application stage to deliver high quality sustainable development in accordance with Local Site Allocation Policy PS35 requirements.

- j. Some of the representations raise other concerns relating to the development of the site, including legal restrictions, the impact of additional traffic and the availability of local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?

6f.44.12 Topic Paper: Assessment and selection of sites topic paper (EB9) sets out in detail the site selection process at each stage of the Local Plan review and how this has been suitably informed by evidence base studies, Sustainability Appraisal (SA) and representations received through Regulation 18 and Regulation 19 public consultation on the emerging Local Plan.

6f.44.13 Consultation reports for the Pre-Submission Plan (SLP-01a) and Draft Plan 2019 (CD4d) set out the concerns highlighted by representations and detail the Council's response to the issues raised.

Matter 6g The Severn Vale site allocations

Local Sites Allocation Policy PS44 Northwest of Whitminster Lane

45. The site is allocated for approximately 30 dwellings and open space use to provide an extension to Frampton-on-Severn.

a. What type and level of open space uses would be required or is this covered by other policies?

6g.45.1 Local Sites Allocation Policy PS44 identifies a policy requirement for open space uses as an integral part of residential development to be approved at the masterplan stage as part of a future planning application.

6g.45.2 Delivery Policy DES2 Green Infrastructure (GI) provides the detailed development management framework for the consideration of open space provision in association with new development, justified by the evidence base and the robust assessment of GI across the district detailed in the Stroud Open Space, GI and Recreation Study 2019 (EB41).

6g.45.3 Part 2 of the study for the Severn Vale Cluster (EB41g), provides a qualitative review of GI assets within the Severn Vale Cluster, including Frampton on Severn, and sets out the quantity requirements, by typology, for open space provision from new residential development alongside the identification of local opportunities to enhance GI provision.

b. The policy lists three issues to be addressed which include incorporating the Public Right of Way into the development, the proximity of the Gloucester and Sharpness Canal and ensuring a high quality edge to Frampton. What specifically would the development be required to achieve; would the requirements be justified and are they viable? Should these be clearly set out within the policy?

6g.45.4 The policy identifies the site issues to address at the masterplan stage, as part of a future planning application, to deliver high quality sustainable development having regard to potential impacts identified throughout the Local Plan review.

6g.45.5 The supporting text sets out how high-quality sustainable development will be achieved, informed by the evidence base; in particular SALA site assessment FRA004 (EB20c) and the Stroud Open Space, GI and Recreation Study 2019 (EB41). Specifically, the provision of a high quality and accessible Public Right of Way (PROW) linking Oatfield Road and Whitminster Lane and the retention of a visual gap to maintain the distinction between Frampton village and Oatfield and respect the rural setting of the Gloucester and Sharpness Canal. Further justification for this approach is set out in the Summary of Regulation 20 responses to the Pre-Submission Draft Plan PART 1: Site Allocations (SLP-01a). Allocation of the site for 30 dwellings is in accordance with the development strategy for Frampton-on Severn, a Tier 3a settlement, and as a greenfield development is considered viable.

- 6g.45.6 Delivery policies ES6 Providing for biodiversity and geodiversity, ES7 Landscape character and ES8 Trees, hedgerows and woodlands set out the development management policy framework for the detailed consideration of biodiversity and landscaping provision at the planning application stage to deliver high quality sustainable development in accordance with Local Site Allocation Policy PS44 requirements.
- 6g.45.7 The Council considers this is a justified, suitably clear and consistent approach to all local site allocations identified in the Plan.
- c. Some of the representations raise concerns about other issues relating to the development of the site, including drainage and sewage infrastructure, the siting of the access and the availability of local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?
- 6g.45.8 The Council considers that other issues relating to the development of the site have been suitably assessed as part of the process to allocate this site.
- 6g.45.9 Topic Paper: Assessment and selection of sites topic paper (EB9) sets out in detail the site selection process at each stage of the Local Plan review and how this has been suitably informed by evidence base studies, Sustainability Appraisal (SA) and representations received through Regulation 18 and Regulation 19 public consultation on the emerging Local Plan.
- 6g.45.10 Consultation reports for the Pre-Submission Plan (SLP-01a) and Draft Plan 2019 (CD4d) set out the concerns highlighted by representations and detail the Council's response to the issues raised.
- 6g.45.11 Further justification for the role and function of Frampton on Severn in the district's settlement hierarchy and the appropriate level of growth based on transport links and accessibility to a range of local facilities is set out in the Stroud District Settlement Role and Function Study 2014 (EB71), its Update 2018 (EB72) and Topic Paper: The Development Strategy (EB4).

Local Sites Allocation Policy PS45 Land west of Upton's Garden, Whitminster

46. The site is allocated for approximately 10 dwellings and open space uses and strategic landscaping.
- a. What type and level of open space uses and strategic landscaping would be required or is this covered by other policies? The supporting text states that the western half of the site should be retained as accessible open space, to protect the setting of Parklands House to the south, but reasons for this are not given. Is this a heritage asset and is the retention of open space justified in this context?

- 6g.46.1 Local Sites Allocation Policy PS45 identifies a policy requirement for open space uses as an integral part of residential development to be approved at the masterplan stage as part of a future planning application.
- 6g.46.2 Delivery Policy DES2 Green Infrastructure (GI) provides the detailed development management framework for the consideration of open space provision in association with new development, justified by the evidence base and the robust assessment of GI across the district detailed in the Stroud Open Space, GI and Recreation Study 2019 (EB41).
- 6g.46.3 Part 2 of the study for the Severn Vale Cluster (EB41g), provides a qualitative review of GI assets within the Severn Vale Cluster, including Whitminster, and sets out the quantity requirements, by typology, for open space provision from new residential development alongside the identification of local opportunities to enhance GI provision.
- 6g.46.4 SALA site assessment WHI004 (EB19c) identifies a potential impact from development on Parklands House Grade II listed building to the south of the site. The accompanying SALA Heritage Impact Appraisal 2017 (EB50) provides a full assessment of the potential impacts on heritage interest and sets out the justification for the retention of the western half of the site as accessible open space.
- b. Which heritage assets need to be ‘conserved and enhanced’ and is the wording in the policy consistent with national policy?
- 6g.46.5 As set out above, Parklands House is a Grade II listed building lying immediately to the south of the site.
- 6g.46.6 The policy wording states that “*Particular issues to address include conserving and enhancing heritage assets...*”. The Council considers this wording to be consistent with national policy. NPPF Chapter 16 (paragraphs 189-208) is entitled “Conserving and enhancing the historic environment” and covers diverse aspects of positive heritage asset management. National Planning Practice Guidance explains what is meant by the conservation and enhancement of the historic environment (Paragraph: 002 Reference ID: 18a-002-20190723).
- c. How will a decision-maker determine whether landscape impacts are minimised and local biodiversity is safeguarded and enhanced? Do specific biodiversity and landscape requirements need to be made clear in the policy or are such issues covered by other Plan policies?
- 6g.46.7 The policy identifies the site issues to address at the masterplan stage, as part of a future planning application, to deliver high quality sustainable development having regard to potential impacts identified throughout the Local Plan review.
- 6g.46.8 The supporting text sets out how high-quality sustainable development will be achieved, informed by the evidence base; in particular SALA site assessment WHI004 (EB19c) and the Stroud Open Space, GI and Recreation Study 2019

(EB41). Specifically, robust tree planting on the south western site boundary will be required to screen development at the settlement edge alongside the protection and enhance of existing boundary trees and hedgerows to protect the mature landscape setting of heritage assets and safeguard and enhance local biodiversity. Further justification for this approach is set out in the Summary of Regulation 20 responses to the Pre-Submission Draft Plan PART 1: Site Allocations (SLP-01a).

- 6g.46.9 Delivery policies ES6 Providing for biodiversity and geodiversity, ES7 Landscape character and ES8 Trees, hedgerows and woodlands set out the development management policy framework for the detailed consideration of biodiversity and landscaping provision at the planning application stage to deliver high quality sustainable development in accordance with Local Site Allocation Policy PS45 requirements.
- 6g.46.10 The Council considers this is a justified and suitably clear approach to all local site allocations identified in the Plan.
- d. Should the requirements in the supporting text be set out in the policy and if so are they justified and suitably clear?
- 6g.46.11 As outlined above, the policy identifies the site issues to address at the masterplan stage, as part of a future planning application, to deliver high quality sustainable development having regard to potential impacts identified throughout the Local Plan review.
- 6g.46.12 The supporting text clearly sets out how high-quality sustainable development will be achieved and the site specific measures to be included at the masterplan/ planning application stage to deliver high quality sustainable development in accordance with Local Site Allocation Policy PS45 requirements.
- 6g.46.13 The Council considers this is a justified, suitably clear and consistent approach to all local site allocations identified in the Plan.
- e. Some of the representations raise concerns about other issues relating to wildlife habitat, waste water infrastructure and public transport. Have such factors been suitably assessed as part of the process to allocate this site?
- 6g.46.14 The Council considers that other issues relating to the development of the site have been suitably assessed as part of the process to allocate this site.
- 6g.46.15 Topic Paper: Assessment and selection of sites topic paper (EB9) sets out in detail the site selection process at each stage of the Local Plan review and how this has been suitably informed by evidence base studies, Sustainability Appraisal (SA) and representations received through Regulation 18 and Regulation 19 public consultation on the emerging Local Plan.

- 6g.46.16 Consultation reports for the Pre-Submission Plan (SLP-01a) and Draft Plan 2019 (CD4d) set out the concerns highlighted by representations and detail the Council's response to the issues raised.
- 6g.46.17 Further justification for the role and function of Whitminster in the district's settlement hierarchy and the appropriate level of growth based on transport links, including public transport, and accessibility to a range of local facilities is set out in the Stroud District Settlement Role and Function Study 2014 (EB71), its Update 2018 (EB72) and Topic Paper: The Development Strategy (EB4).

Local Sites Allocation Policy PS46 Land west of School Lane, Whitminster

47. The site is allocated for up to 40 dwellings and open space uses and strategic landscaping.

- a. Some details on open space and landscaping are provided in the supporting text. Are these policy requirements, are they justified and should they be set out in the policy?

6g.47.1 The policy identifies the site issues to address at the masterplan stage, as part of a future planning application, to deliver high quality sustainable development having regard to potential impacts identified throughout the Local Plan review.

6g.47.2 The supporting text sets out how high-quality sustainable development will be achieved and the site specific measures to be included at the masterplan/ planning application stage to meet Local Site Allocation Policy PS46 requirements for open space and strategic landscaping.

6g.47.3 The site specific measures have been informed by the evidence base; in particular SALA site assessment WHI005 (EB19c) and in response to public consultation as set out in the Summary of Regulation 20 responses to the Pre-Submission Draft Plan PART 1: Site Allocations (SLP-01a).

6g.47.4 The Council considers this is a justified, suitably clear and consistent approach to all local site allocations identified in the Plan.

- b. How will a decision-maker determine whether landscape impacts are minimised? What is strategic landscaping? Do specific landscape requirements need to be made clear in the policy or are such issues covered by other Plan policies?

6g.47.5 The policy identifies the site issues to address at the masterplan stage, as part of a future planning application, to deliver high quality sustainable development having regard to potential impacts identified throughout the Local Plan review including minimising landscape impacts and integrating the public right of way (PROW) within landscaped open space.

- 6g.47.6 The supporting text sets out how this will be achieved through a strategic landscaped buffer and robust tree planting on the southwestern site boundary, to screen development at the settlement edge, together with the enhancement of the PROW as high quality Green Infrastructure (GI).
- 6g.47.7 Delivery policies ES7 Landscape character, ES8 Trees, hedgerows and woodlands and DES2 Green Infrastructure set out the development management policy framework for the detailed consideration of landscaping and GI provision at the planning application stage to deliver high quality sustainable development in accordance with Local Site Allocation Policy PS46 requirements.
- 6g.47.8 The Council considers this is a justified, suitably clear and consistent approach to all local site allocations identified in the Plan.
- c. Some of the representations raise concerns about other issues relating to the Industrial Heritage Conservation Area, waste water infrastructure and public transport. Have such factors been suitably assessed as part of the process to allocate this site?
- 6g.47.9 The Council considers that other issues relating to the development of the site have been suitably assessed as part of the process to allocate this site.
- 6g.47.10 Topic Paper: Assessment and selection of sites topic paper (EB9) sets out in detail the site selection process at each stage of the Local Plan review and how this has been suitably informed by evidence base studies, Sustainability Appraisal (SA) and representations received through Regulation 18 and Regulation 19 public consultation on the emerging Local Plan.
- 6g.47.11 Consultation reports for the Pre-Submission Plan (SLP-01a) and Draft Plan 2019 (CD4d) set out the concerns highlighted by representations and detail the Council's response to the issues raised.
- 6g.47.12 Further justification for the role and function of Whitminster in the district's settlement hierarchy and the appropriate level of growth based on transport links, including public transport, and accessibility to a range of local facilities is set out in the Stroud District Settlement Role and Function Study 2014 (EB71), its Update 2018 (EB72) and Topic Paper: The Development Strategy (EB4).

Matter 6h The Wotton cluster site allocations

Local Sites Allocation Policy PS38 South of Wickwar Road, Kingswood

48. The site is allocated for 50 dwellings and open space uses.

a. What type and level of open space uses would be required or is this covered by other policies?

6h.48.1 Local Sites Allocation Policy PS38 identifies a policy requirement for open space uses and strategic landscaping as an integral part of residential development to be approved at the masterplan stage as part of a future planning application.

6h.48.2 Delivery Policy DES2 Green Infrastructure (GI) provides the detailed development management framework for the consideration of open space provision in association with new development, justified by the evidence base and the robust assessment of GI across the district detailed in the Stroud Open Space, GI and Recreation Study 2019 (EB41).

6h.48.3 Part 2 of the study for the Wotton Cluster (EB41j), provides a qualitative review of GI assets within the Wotton Cluster, including Kingswood, and sets out the quantity requirements, by typology, for open space provision from new residential development alongside the identification of local opportunities to enhance GI provision.

b. The policy states that ‘local biodiversity’ issues need to be addressed for this site. The policy also refers to ‘integrating the development into the landscape setting’. The supporting text states that development will retain and enhance existing trees and hedgerows to support these two aims, but this is not set out in the policy. Is this approach justified? Do specific biodiversity and landscape requirements need to be made clear in the policy or are such issues covered by other Plan policies?

6h.48.4 The policy identifies the site issues to address at the masterplan stage, as part of a future planning application, to deliver high quality sustainable development having regard to potential impacts identified throughout the Local Plan review.

6h.48.5 The supporting text sets out how high-quality sustainable development will be achieved, informed by the evidence base; in particular SALA site assessments KIN05 and KIN011 (EB19c, EB20c) and the Stroud Open Space, GI and Recreation Study 2019 (EB41). Specifically the retention and enhancement of trees and hedgerows to support local biodiversity and integrate the development into the landscape. Further justification for this approach is set out in the Summary of Regulation 20 responses to the Pre-Submission Draft Plan PART 1: Site Allocations (SLP-01a).

6h.48.6 Delivery policies ES6 Providing for biodiversity and geodiversity, ES7 Landscape character and ES8 Trees, hedgerows and woodlands set out the development management policy framework for the detailed consideration of biodiversity and

landscaping provision at the planning application stage to deliver high quality sustainable development in accordance with Local Site Allocation Policy PS38 requirements.

6h.48.7 The Council considers this is a justified, clear and consistent approach to all local site allocations identified in the Plan.

c. The supporting text also refers to walking and cycling routes being within the site but these are not set out in the policy. Can the Council clarify the reasons why and explain whether they are justified as requirements?

6h.48.8 The policy identifies highway safety improvements, to access services within Kingswood village, as a particular issue to address at the masterplan stage as part of a future planning application.

6h.48.9 The supporting text sets out the highway safety measures required including high quality and accessible walking and cycling routes within the site to link with the existing network together with off-site highway improvements to facilitate safer, accessible local pedestrian and cycle access.

6h.48.10 The provision of safe and accessible walking and cycling routes within the site, linked to the existing network, responds to representations from the local community regarding safe, sustainable access concerns within Kingswood village and to Wotton under Edge. Justification for the delivery of walking and cycling links as part of moderate planned growth is set out in the REG 18: Draft Plan for Consultation – Consultation Report April 2021 (CD4d).

6h.48.11 Delivery Policy EI13 Protecting and extending our walking and cycling routes supports and encourages proposals that develop and extend the district's walking and cycling network and identifies the Wotton-Kingswood-Charfield route as a protected route. The policy further requires development adjacent to walking and cycling routes to provide convenient access points for walkers and cyclists.

d. The requirement for highway safety improvements to access services within the village is referenced in the policy? What specifically would the development need to provide, and would they be justified and viable?

6h.48.12 The Kingswood Neighbourhood Development Plan (NDP), Made on 18th May 2017, see Topic Paper: Neighbourhood Planning (EB5), sets out the NDP policies and supporting justification relating to highway safety improvements to improve access to services and pedestrian permeability within the village:

6h.48.13 Policy T1A – Pedestrian connectivity and access identifies four specific primary improvements, to improve pedestrian accessibility and permeability, to be delivered through scalable contributions in association with new development.

6h.48.14 Policy T1B New development and access for all sets out the mechanism for delivering reasonable and proportionate mitigation, to positively improve the

walkability/ accessibility of the village for all users, through planning conditions and s106 contributions at the planning application stage.

- 6h.48.15 Policy T2A – Encouraging active travel and Policy T2B Cycling connectivity identify specific cycle infrastructure and connectivity improvements to improve cycle access and permeability within the village for cyclists, wheelchairs, push chairs and other less mobile users.
- 6h.48.16 The above policies form part of the current Development Plan for Stroud District and set out the specific highway safety improvements for consideration at the masterplan/ planning application stage together with an appropriate mechanism to ensure viability.
- 6h.48.17 Local Site Allocation Policy PS38 reference to identified highway improvements in the Kingswood NDP is therefore considered justified and subject to appropriate viability assessment.
- e. Some of the representations raise concerns about other issues relating to the development of the site, including increased traffic impact and the availability of local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?
- 6h.48.18 The Council considers that other issues relating to the development of the site have been suitably assessed as part of the process to allocate this site.
- 6h.48.19 Topic Paper: Assessment and selection of sites topic paper (EB9) sets out in detail the site selection process at each stage of the Local Plan review and how this has been suitably informed by evidence base studies, Sustainability Appraisal (SA) and representations received through Regulation 18 and Regulation 19 public consultation on the emerging Local Plan.
- 6h.48.20 Consultation reports for the Pre-Submission Plan (SLP-01a) and Draft Plan 2019 (CD4d) set out the concerns highlighted by representations and detail the Council's response to the issues raised.
- 6h.48.21 Further justification for the role and function of Kingswood in the district's settlement hierarchy and the appropriate level of growth based on transport links and accessibility to a range of local facilities is set out in the Stroud District Settlement Role and Function Study 2014 (EB71), its Update 2018 (EB72) and Topic Paper: The Development Strategy (EB4).

Employment Allocation Policy PS47 Land west of Renishaw New Mills

49. The site is 10 hectares in size and is allocated as an extension to the key employment site EK17 Renishaw New Mills for a mix of office, B2 and B8 uses.
- a. Is an extension to the existing employment site in this location justified by robust evidence?

- 6h.49.1 An extension to the existing employment site in this location is justified by evidence within the Employment Land Review (EB30) and the Statement of Common Ground (SoCG).
- 6h.49.2 The SoCG confirms that the allocation is being promoted to ensure that there is adequate room for the growth and expansion of knowledge intensive businesses within the south of the District. The promoter has successfully developed a prototype electric vehicle that has already achieved considerable success and accolade in the UK due to its innovation and technology and the allocated site will provide the headquarters building, research and development centre and manufacturing and sales centre for this new vehicle.
- 6h.49.3 With discussions with the developer on deliverability in 2021, Table 35 of the Employment Land Review reports that plans are well established and progressing for a high valued advanced manufacturing business to occupy the site. In their SoCG, it is noted that a planning application for the new factory is anticipated to be submitted to the Council for consideration in early 2023.
- b. What type and level of open space uses would be required within the site or is this covered by other Plan policies?
- 6h.49.4 The type and level of open space uses will be determined through a masterplan, to be agreed with the Council. It will detail the way in which land uses and infrastructure will be developed in an integrated and co-ordinated manner to retain the rural landscape character.
- c. The policy states that 'local biodiversity' issues need to be addressed for this site. The policy also refers to 'integrating the development into the landscape setting'. The supporting text states that development will retain and enhance existing trees and hedgerows to support these two aims, but this is not set out in the policy. Do specific biodiversity and landscape requirements need to be made clear in the policy or are such issues covered by other Plan policies?
- 6h.49.5 The Council does not consider explicit reference to biodiversity and landscape requirements is necessary within the policy as such issues are covered by other plan policies and the requirements for sustainable drainage and structural landscape buffers within the allocation policy.
- d. The supporting text also refers to walking and cycling routes being within the site but these are not set out as requirements in the policy. Can the Council clarify the reasons for this and explain whether they are justified as requirements?
- 6h.49.6 There is no reference to walking and cycling routes being within the site in the supporting text.

- e. The requirement for highway safety improvements to access services within the village is referenced in the policy? What specifically would the development need to provide, and would they be justified and viable?

6h.49.7 There is no reference to highway safety improvements to access services in the policy.

- f. Some of the representations raise concerns about other issues relating to the development of the site, including increased traffic impact and the availability of local services and facilities. Have such factors been suitably assessed as part of the process to allocate this site?

6h.49.1 The Council considers that other issues relating to the development of the site have been suitably assessed as part of the process to allocate this site.

6h.49.2 Topic Paper: Assessment and selection of sites topic paper (EB9) sets out in detail the site selection process at each stage of the Local Plan review and how this has been suitably informed by evidence base studies, Sustainability Appraisal (SA) and representations received through Regulation 18 and Regulation 19 public consultation on the emerging Local Plan.

6h.49.3 Consultation reports for the Pre-Submission Plan (SLP-01a) and Draft Plan 2019 (CD4d) set out the concerns highlighted by representations and detail the Council's response to the issues raised.

Matter 6i The Cotswold cluster site allocations

Local Sites Allocation Policy PS41 Washwell Fields, Painswick

50. The site is allocated for up to 20 dwellings and open space uses.

a. As regards the site's location within the AONB our queries are as follows:

i. Has its allocation within the AONB been robustly justified and is this suitably recognised within the policy?

6i.50.1 The Council considers that the allocation is justified as part of the Plan's strategic approach to meeting development needs arising from within the AONB. The Cotswolds AONB covers almost half of the District's total land area and this is a key policy driver for the Plan's development strategy.

6i.50.2 In the SDLP at paragraph 2.3.13 - Introduction to the development strategy states that in order to *"support the social wellbeing of AONB communities, the strategy supports limited housing development to meet needs arising from within the AONB"*. This approach includes PS41 at Painswick. Justification for the role of Painswick in the development strategy and the allocation of site PS41 is to meet identified local needs arising from within the AONB is set out in the Settlement Role and Function Study Update 2018 (May 2019) (EB72), the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39) and the Topic Papers: Assessment and selection of sites October 2021 (EB9) and The Development Strategy October 2021 (EB4). In particular, EB39 explains the Council's process for assessing whether development of this site could be regarded as major development in the AONB and whether it could be justified by evidence of local housing need. As a Tier 2 Local Service Centres, Painswick is one of the highest functioning AONB settlements within Stroud District with *"the ability to support sustainable patterns of living in the District, because of the facilities, services and employment opportunities they each offer"* as set out in Core Policy CP3. EB39 explains the Council's strategic approach to allocating sites at Tier 2 settlements within the AONB, in order to meet identified housing needs arising solely from within the AONB. EB39 sets out why the Council considers this approach to accord with paragraphs 176 and 177 of the NPPF, with National Planning Practice Guidance and with the Cotswolds Conservation Board's AONB Management Plan 2018-2023 (EB119).

6i.50.3 The policy wording for both site allocations PS41 specifies *"affordable housing will be for those with a local connection to address local housing needs within the AONB"*; and Core Policy CP9 (Affordable housing) is clear that *"the Council will negotiate the tenure, size and type of affordable units on a site by site basis, having regard to housing needs, site specifics and other factors"* – the supporting text for CP9 sets out that local needs will be evidenced through Local Housing Needs Assessments and that the Council will prepare a Supplementary Planning Document to provide detail of how the policy will be implemented.

- 6i.50.4 The site allocation policy PS41 does not specify that market housing on these sites will meet needs arising from within the AONB. That is, however, the Council's expectation – as the Council's Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39, paragraphs 4.12 – 4.14) explains.
- 6i.50.5 In addition to limiting the scale of development and specifying that affordable housing must address local needs within the AONB, the Local Sites Allocation Policy identifies a number of issues to be specifically addressed:
- Minimising landscape impacts within the Cotswolds AONB
 - Conserving and enhancing heritage assets and local biodiversity
 - Delivering high quality locally distinctive design
 - Incorporating the existing PROW within landscaped open space
- 6i.50.6 The supporting text provides further detail of the requirements to ensure development takes account of heritage impacts and the role that the site can play in enhancing the settlement edge through strategic landscaping and locally distinctive design. The Council considers that these requirements suitably recognise the requirement for great weight to be given to the conservation and enhancement of the AONB and will ensure that the scale and extent of development within it is limited, in accordance with NPPF paragraph 176. The strategy will meet proven needs, whilst avoiding the need for major development in accordance with paragraph 177.
- ii. How will a decision-maker determine that 'landscape impacts within the Cotswolds AONB' will be minimised when determining future applications for the site?
- 6i.50.7 The Council will determine whether the landscape impacts within the Cotswolds AONB through the usual planning application process which will involve a decision to be made on a case by case basis weighing up Development Plan policies and any other material considerations such as the Cotswolds National Landscape Board planning guidance and feedback. Of particular interest will be SDLP Delivery policies ES6 Providing for biodiversity and geodiversity, ES7 Landscape character and ES8 Trees hedgerows and woodlands set out the development management policy framework for the detailed consideration of biodiversity and landscaping provision at the planning application stage to deliver high quality sustainable development in accordance with Local Site Allocation Policy PS41 requirements. The District Landscape Sensitivity Assessment identified that PS41 is located within a larger land parcel identified in the Landscape Sensitivity Assessment 2016 as High/Medium sensitivity to housing uses. However, the Assessment states that the field between Washwell Farm and Lower Washwell Lane may be able to accommodate some housing as this site is largely screened from views. Following further landscape assessment in 2019, the importance of retaining a minimum 50m gap between the northern boundary of the site and the Washwell Farm complex was confirmed as was the importance of tree and hedge planting on the northern boundary, accommodating the existing mature trees in and adjacent to the site and the provision of further large species

trees. On this basis the landscape assessment was that the site was suitable for development.

- iii. Is the Council's conclusion that the site does not constitute major development, in the context of paragraph 177 of the Framework, justified?

6i.50.8 Evidence Document EB39 explains the Council's process for assessing whether development of this site could be regarded as major development in the AONB and sets out why the Council considers this approach to accord with paragraphs 176 and 177 of the NPPF, with National Planning Practice Guidance and with the Cotswolds Conservation Board's AONB Management Plan 2018-2023 (EB119). The proposed site at Painswick (up to 20 dwellings) would represent an increase of 1.6% on the current size of the settlement (c.1274 dwellings in 2020). Painswick has the status and character of a historic town and the focus for historic development serving the surrounding countryside. The level of development is both numerically and proportionately is of such a scale as to not represent major development.

- b. How much open space is sought within the site and is this justified?

6i.50.9 Local Sites Allocation Policy PS41 identifies a policy requirement for open space uses as an integral part of residential development to be approved at the masterplan stage as part of a future planning application.

6i.50.10 Delivery Policy DES2 Green Infrastructure (GI) provides the detailed development management framework for the consideration of open space provision in association with new development, justified by the evidence base and the robust assessment of GI across the district detailed in the Stroud Open Space, GI and Recreation Study 2019 (EB41).

6i.50.11 Part 2 of the study for the Gloucester Fringe (EB41e), provides a qualitative review of GI assets within the Cotswold Cluster, including Painswick and sets out the quantity requirements, by typology, for open space provision from new residential development alongside the identification of local opportunities to enhance GI provision.

- c. The evidence in EB39 Appendix A includes statements that, in regard to this site, there are 'no significant heritage constraints'. The site adjoins the garden grounds of the Grade II listed Washwell House and there are two conservations areas (Painswick and Gyde House) within the surrounding area. The policy refers to 'conserving heritage assets and their settings' and the supporting text mentions 'heritage properties along Cheltenham Road'.

- i. What assessments have been carried out of the impact that the development of the site may have on the significance of all relevant heritage assets? How has this informed the decision to allocate the site?

6i.50.12 The policy wording states that “Particular issues to address include conserving and enhancing heritage assets through high quality design...”. The Council considers this wording to be consistent with national policy. NPPF Chapter 16 (paragraphs 189-208) is entitled “Conserving and enhancing the historic environment” and covers diverse aspects of positive heritage asset management. National Planning Practice Guidance explains what is meant by the conservation and enhancement of the historic environment (Paragraph: 002 Reference ID: 18a-002-20190723). The Council considers the intent behind Local Sites Allocation Policy PS11 accords particularly with the advice (Paragraph: 003 Reference ID: 18a-003-20190723) that;

“...plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area.”

6i.50.13 Whilst the Council expects that the form of future development here will be guided principally through the site allocation policy, the ‘whole plan’ approach means that more specialist policies, including ES10 (Valuing our historic environment and assets), provide specific criteria to be addressed by developers and considered by decision makers.

6i.50.14 ES10 supporting text (para.6.71) sets out what the Council considers to constitute a heritage asset, including archaeological remains and ranging from sites and buildings of local historic value to those of the highest significance, consistent with national policy (NPPF para. 189). ES10 Criterion 1 requires a heritage statement to be produced for any development proposals involving any one of those things, to ensure the impacts of potential development can be properly considered.

6i.50.15 The Council considers Local Sites Allocation Policy PS41 has usefully signposted the developer to the issues that need to be addressed. Whilst the policy refers only to “heritage assets” in general terms, the supporting text (3.8.6) provides adequate clarification. The text explains that the policy expectation is for development to ensure a good relationship with heritage properties along the Cheltenham Road.

6i.50.16 The Council considers this to be effective and justified guidance about what is required from the development in this context and considers that it reflects the Plan’s evidence base. A rigorous site selection process (as evidenced through Topic Paper – Assessment and selection of sites, October 2021, EB9) has included assessment of potential development impacts on a range of heritage assets across Stroud District and informed the Council’s choice of sites where there is scope for development to bring about the conservation or enhancement of heritage assets.

6i.50.17 This formed a key part of the Strategic Assessment of Land Availability and is evidenced for this site through the SALA Heritage Impact Appraisal 2017 (EB50, page PAI3), which identifies the site’s location adjoining the garden grounds of Grade II listed Washwell House, development would be unlikely to affect the

setting of the listed building to the extent that it would harm its character or alter its historic or architectural interest significantly. Similarly, the physical and visual separation provided by the A46 and the enclosure provided by the buildings of Washwell Farm and Washwell House mean that there is relatively little relationship between this land and the Gyde House conservation area. The impact on the character and significance of the listed buildings and the conservation area is likely to be minimal, subject to the scale and design of any new development. EB50 highlights key features of the site and its surroundings that contribute to the character and significance of the conservation areas and other heritage assets identified and advises on how these features might influence the layout, scale and massing of new development.

- ii. Is the approach in the Plan justified and is the wording in the policy consistent with national policy and legislation on the historic environment?

6i.50.18 With reference to the preceding question, the Council considers that the approach in the Plan justified and is the wording in the policy consistent with national policy and legislation on the historic environment.

- d. What specific ecological, landscape and access issues need to be addressed? Why does the policy refer to 'potential' impacts?

6i.50.19 The policy identifies the site issues to address at the masterplan stage, as part of a future planning application, to deliver high quality sustainable development having regard to potential impacts identified throughout the Local Plan review.

6i.50.20 The supporting text sets out how high-quality sustainable development will be achieved, informed by the evidence base; in particular SALA site assessment PAI004 (EB19c) and accompanying SALA Heritage Impact Appraisal 2017 (EB50) which identify potential impacts of development and any necessary mitigation to avoid harm to interests of acknowledged importance. Specifically, provision of a suitable access onto Lower Washwell Lane and the retention and enhancement of mature landscape features. Further justification for this approach is set out in the Summary of Regulation 20 responses to the Pre-Submission Draft Plan PART 1: Site Allocations (SLP-01a).

6i.50.21 Delivery policies HC1 Detailed criteria for new housing developments, ES6 Providing for biodiversity and geodiversity, ES7 Landscape character and ES8 Trees, hedgerows and woodlands set out the development management policy framework for the detailed consideration of safe access, biodiversity and landscaping provision at the planning application stage to deliver high quality sustainable development in accordance with Local Site Allocation Policy PS41 requirements.

6i.50.22 The Council considers this is a justified, suitably clear and consistent approach to all local site allocations identified in the Plan.

- e. Is the policy wording that affordable housing will be for those with a local connection justified? How will this be assessed?

6i.50.23 The policy wording for site allocation PS41 specifies “*affordable housing will be for those with a local connection to address local housing needs within the AONB*”; and Core Policy CP9 (Affordable housing) is clear that “*the Council will negotiate the tenure, size and type of affordable units on a site by site basis, having regard to housing needs, site specifics and other factors*”. This seeks to address local needs arising from the specific settlement rather than addressing District wider needs. It is therefore justified to require development to address specific local housing needs and for affordable housing requirements to meet those with a strong local connection. The allocation policy PS41 requirement is effective as it directly relates to local evidence of housing need. The affordable housing element of the allocation policy will meet the needs as set out in the Council’s Policy Assessment of Draft Allocated Sites in the Cotswolds AONB (May 2021) (EB39, paragraphs 4.12 –4.14).

- f. Some of the representations raise concerns about other issues affecting the site including a restrictive covenant, the impact of additional traffic, and inadequate local services. Have these factors been suitably assessed as part of the process to allocate this site?

6i.50.24 The Council considers that other issues relating to the development of the site have been suitably assessed as part of the process to allocate this site.

6i.50.25 Topic Paper: Assessment and selection of sites topic paper (EB9) sets out in detail the site selection process at each stage of the Local Plan review and how this has been suitably informed by evidence base studies, Sustainability Appraisal (SA) and representations received through Regulation 18 and Regulation 19 public consultation on the emerging Local Plan.

6i.50.26 The Council approached the site promoter in February 2021 asking about development and the status of the deed of covenant which excludes a proportion of the proposed site from “building” dating back to 21 July 1949. The Covenant is worded only to the erection of a “Building”. The site promoter sought legal opinion and confirmed that the covenant does not preclude gardens nor roadway/footpath being created and that the intention is for gardens to be within the area in question.

6i.50.27 In addition it was confirmed that the question of access has been rehearsed by their Highway Consultants. They are of the opinion that Lower Washwell Lane offers the safest route, although a design off Cheltenham Road has also been quantified. Access for development will come from Lower Washwell Lane where there is a direct frontage to the Highway which was acceptable to Gloucestershire CC Highways. It was also explained that for the avoidance of doubt the Cheltenham Road access point falls within the ownership of the same family and therefore can be delivered if the Highway Authority have a preference to that possibility.

6i.50.28 Consultation reports for the Pre-Submission Plan (SLP-01a) and Draft Plan 2019 (CD4d) set out the concerns highlighted by representations and detail the Council’s response to the issues raised.

6i.50.29 Further justification for the role and function of Painswick in the district's settlement hierarchy and the appropriate level of growth based on transport links and accessibility to a range of local facilities is set out in the Stroud District Settlement Role and Function Study 2014 (EB71), its Update 2018 (EB72) and Topic Paper: The Development Strategy (EB4).