

# Stroud District Local Plan Review

Duty to Cooperate Statement

October 2021

Stroud District Council  
Ebley Mill  
Stroud  
Gloucestershire  
GL5 4UB

The Planning Strategy Team  
local.plan@stroud.gov.uk

visit [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)



## 1. INTRODUCTION

- 1.1 This statement sets out how Stroud District Council has addressed the legal duty to cooperate in the production of the Stroud Local Plan. It details how the Council has worked collaboratively with other bodies, including neighbouring local authorities and key organisations to address strategic issues and priorities. The statement demonstrates how Stroud District has fulfilled the duty by detailing the process of engagement and cooperation, the bodies involved and the outcomes of the process.

### **Localism Act 2011 and Planning and Compulsory Purchase Act 2004**

- 1.2 Section 110 of the 2011 Localism Act inserted the Duty to Co-operate as a new Section 33A into the Planning and Compulsory Purchase Act 2004. The duty requires local planning authorities, county councils and prescribed bodies to co-operate effectively with each other when preparing development plan documents, local development documents, marine plans and when undertaking activities that prepare the way for the preparation of, or support the preparation of, the above documents.
- 1.3 The duty only applies where such activities relate to a 'strategic matter'. A strategic matter is defined by the Act (section 33A, part (4)) as:
- a) "sustainable development or use of land that has or would have significant impact on at least two planning areas, including (in particular) sustainable development or use of land for, or in connection with, infrastructure that is strategic and has, or would have, a significant impact on at least two planning areas; and
  - b) sustainable development or use of land in a two-tier area if the development or use:
    - i. is a county matter; or
    - ii. has, or would have, a significant impact on a county matter."

### **National Planning Policy Framework 2021 (NPPF)**

- 1.4 Paragraphs 24 to 27 of the NPPF set out how local planning authorities and county councils are expected to maintain effective cooperation on strategic matters that cross administrative boundaries. This includes:
- Identifying the strategic matters which they need to address in their plans
  - Engaging with local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation and infrastructure providers
  - Preparing and maintaining statements of common ground, documenting the cross boundary matters being addressed and progress in cooperating to address these.
- 1.5 In addition, there are two test of soundness in the NPPF (paragraph 35) which relate directly to the duty:
- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development
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- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

### **National Planning Practice Guidance (PPG)**

- 1.6 PPG (Ref. ID 61-030-20190315) clarifies that Local Enterprise Partnerships (LEPs) and Local Nature Partnerships (LNPs) “are not subject to the requirements of the duty”, but local planning authorities “must cooperate with them.”
- 1.7 The PPG also provides guidance on the content and production of statements of common ground which form part of the evidence required to demonstrate that local planning authorities have complied with the duty. Statements should be “a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these” (Ref. ID 61-011-20190315). Activities documented in statements “should be tailored to local circumstances”, but will include:
- “working together at the outset of plan-making to identify cross-boundary matters which will need addressing;
  - producing or commissioning joint research and evidence to address cross-boundary matters;
  - assessing impacts of emerging policies; and
  - preparing joint, or agreeing, strategic policies affecting more than one authority area to ensure development is coordinated, (such as the distribution of unmet needs or policies relating to county matters).” (Ref. ID 61-015-20190315)
- 1.8 “Authorities should have made a statement of common ground available on their website by the time they publish their draft plan, in order to provide communities and other stakeholders with a transparent picture of how they have collaborated.” (Ref. ID 61-020-20190315)

### **Prescribed bodies for Stroud District**

- 1.9 The list of ‘prescribed bodies’ that fall under the duty are set out in the Act itself plus the subsequent Town and Country Planning (Local Planning) (England) Regulations 2012. For Stroud District, they are as follows:

#### **Local Planning Authorities**

The Council has taken this to mean all neighbouring authorities, namely:

- Cheltenham Borough Council
- Cotswold District Council
- Forest of Dean District Council
- Gloucester City Council
- South Gloucestershire Council (unitary authority); and
- Tewkesbury Borough Council

#### **County Councils**

The Council has taken this to mean the County Council covering the planning area and any County Councils that physically border the District, namely:

- Gloucestershire County Council
  - South Gloucestershire Council (unitary authority)
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**Other Prescribed Bodies**

- Civil Aviation Authority;
- Environment Agency;
- Gloucestershire NHS Clinical Commissioning Group;
- Historic England;
- Homes England;
- Marine Management Organisation;
- National Health Service England;
- National Highways;
- Natural England;
- Office of Road and Rail.

1.10 GFirst LEP and Gloucestershire Nature Partnership, although not falling under the duty, have also been subject to ongoing cooperation on strategic matters.

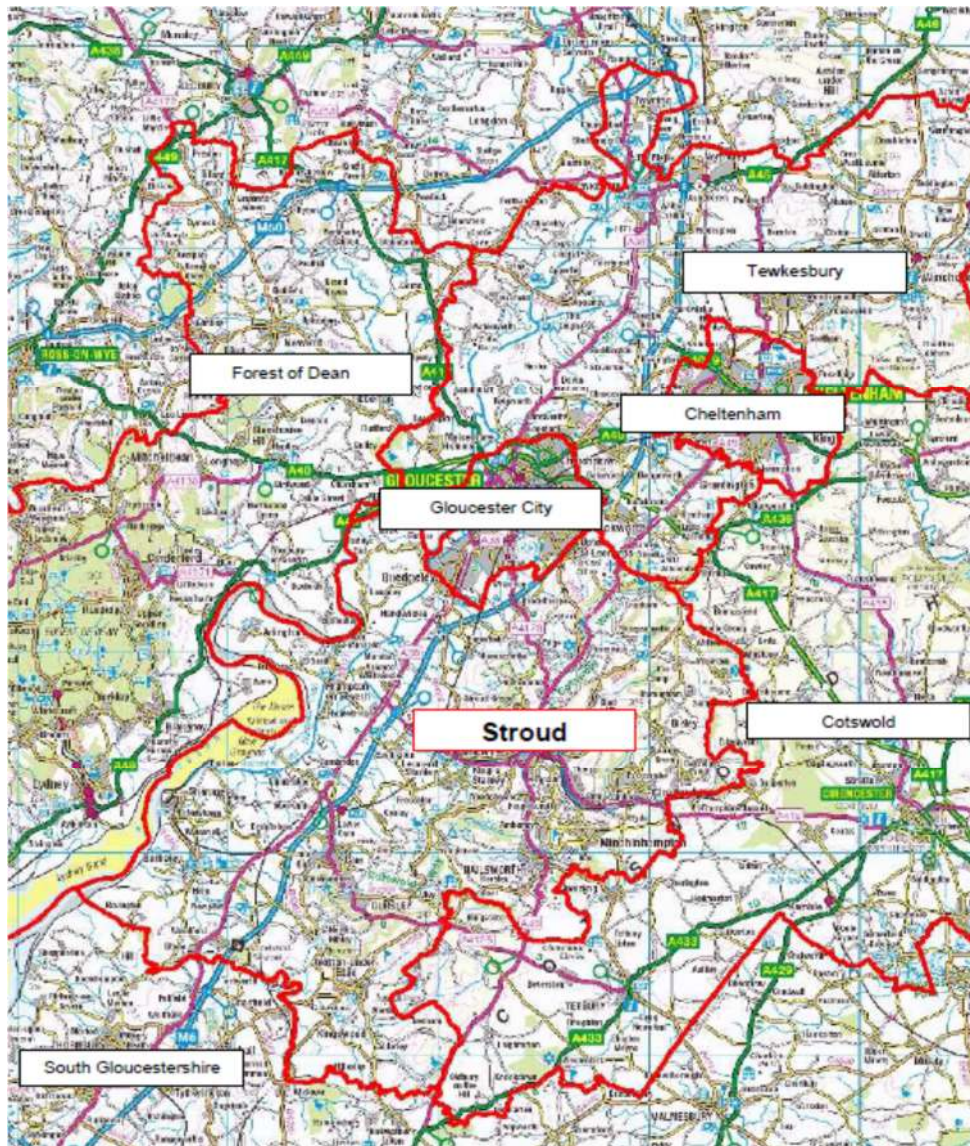
## **2. STROUD DISTRICT CONTEXT**

- 2.1 Stroud District has a population of 119,019 (2018) and is one of the six districts that make up the County of Gloucestershire. It covers an area of approximately 45,325 hectares (about 175 square miles). The district is predominantly rural in nature, with the towns of Stroud, Stonehouse, Cam and Dursley providing the main service centres within the District. Proximity to Gloucester and Cheltenham to the north, and Bristol to the south, have an important influence on travel patterns for work and access to services.
- 2.2 Gloucestershire sits at the periphery of England's south west and has close links with the Midlands, as well as south Wales. Stroud District shares boundaries with Cotswold District, Gloucester City, Tewkesbury Borough and the unitary authority of South Gloucestershire. Our neighbour to the west is the Forest of Dean, which sits on the opposite bank of the River Severn estuary.

### **Neighbouring local planning authorities**

- 2.3 Much of the eastern half of the District falls into the Cotswold Area of Outstanding Natural Beauty (AONB), which covers just over 50% of the District's total land area. The western half of the District, characterised by the low lying landscape of the Severn Vale, is bounded by the Severn Estuary and includes extensive areas of land liable to flooding which extend eastwards along the river corridors within the Stroud Valleys. The District contains internationally important wildlife sites at the Severn Estuary, at Rodborough Common (south of Stroud) and at beech woodland straddling the north eastern boundary of the District with Tewkesbury District.
- 2.4 The Gloucestershire local planning authorities which share boundaries with Stroud are Cotswold District Council, Forest of Dean District Council, Gloucester City Council and Tewkesbury Borough Council. Although Cheltenham Borough Council is not directly adjoining Stroud, it is part of a Joint Strategy with Gloucester City and Tewkesbury Borough and has been part of strategic planning discussions throughout the Local Plan process. South Gloucestershire sits outside the County, however it adjoins Stroud to the south (see Map 1)

Map 1: Map of Neighbouring Local Planning Authorities



### 3. COOPERATION IN THE PREPARATION OF THE LOCAL PLAN

#### Consultation stages

- 3.1 The development of the Local Plan has involved several rounds of formal consultation and engagement with members of the public, statutory consultees and other key stakeholders including the business community, infrastructure providers and developers. A variety of methods and techniques have been used. These are well documented and are not repeated here. However, the following table provides a summary of the main documents consulted upon, all of which, including summaries of responses received, are publicly available on the Council's website.

Issues and options	Autumn 2017
Emerging strategy	Autumn 2018
Final draft plan	Autumn 2019
Additional housing options	Autumn 2020
Pre-Submission	Spring 2021

- 3.2 After each stage of public consultation, the Council has reviewed the responses received, identified the key issues and has sought to address these. A Council response setting out how the Council has taken into account views expressed has been reported through consultation reports.
- 3.3 Outside of the formal consultation stages, the Council has worked collaboratively through the evidence base work undertaken to inform the Local Plan at its various stages and to help maximise the robustness of the Plan.
- 3.4 The Council's Reg.18 and Reg.19 consultation reports provide an account of formal consultation which has taken place during the Local Plan's development, including who was consulted, how and when that consultation has occurred.

#### Co-operation with local planning authorities and county councils

- 3.5 Stroud District Council has engaged with neighbouring local planning authorities and with Gloucestershire County Council throughout the Local Plan process. This is in addition to engagement through responses received to the formal consultation processes.
- 3.6 Engagement can be summarised as having taken place in the following ways:
- Identification of strategic matters of shared interest
  - Investigating options for working more closely together to develop a long term strategic planning framework
  - Joint commissioning of key evidence base documents
  - Identifying and assessing spatial options
  - Agreeing strategic policies which seek to address needs arising from more than one authority area



- 3.7 At the start of the Local Plan process in 2017, the discussion of strategic planning matters was co-ordinated across the Gloucestershire authorities through the County Strategic Planning Issues Group (CSPIG). This consisted of Chief Executives, senior officers and relevant lead members from each district authority and the County Council. The Group was accountable to Leadership Gloucestershire. More recently, this has been replaced by a Senior Officers Group which meets regularly to discuss economic growth and strategic planning matters. The Group also maintains a County Strategic Infrastructure Pipeline and recommends those infrastructure projects considered to be of strategic significance for Gloucestershire for strategic funding.
- 3.8 The Senior Officer Group reports to and prepares the future agenda for the Gloucestershire Economic Growth Joint Committee (GEGJC). This was established in September 2014 and is a statutory joint committee made up of the seven Gloucestershire Councils. The main purpose of GEGJC is to make sure the seven Councils co-ordinate their efforts in support of the Strategic Economic Plan (SEP) and the Growth Deal and this includes joint working on the co-ordination of strategic planning activities and infrastructure planning.
- 3.9 The Senior Officers Group is supported by a County Planning Officers Group (CPOG). Each Gloucestershire local authority is represented by their planning policy manager on CPOG which meets quarterly to engage in issues related to spatial planning. The group acts as an informal but structured body providing advice and discussing matters of common interest. The main functions of the group are:
- To discuss and act on Gloucestershire planning policy matters
  - To monitor and be the main conduit for technical discussion between local planning authorities for the purpose of plan making and implementing the duty to co-operate
  - To coordinate joint studies and operationally oversee these
  - To respond to requests from and provide information and advice for Senior Officers Group and other groups
  - To provide a planning policy view and input for outside bodies (e.g. LEP) under the guidance of others for example Senior Officer Groups or Leadership Gloucestershire
  - To exchange information and discuss planning matters with other bodies as appropriate in order to inform plan making in the County
  - To liaise with other officer groups e.g. housing and infrastructure providers, to ensure information sharing and enable joint working where possible
- 3.10 In 2018 it was recognised that a better coordinated approach to long term spatial planning in Gloucestershire would be beneficial. Such an approach could provide an agreed broad vision for the future growth of the County which would support local plan development and avoid duplication, potential conflict between plans and fulfil the duty to cooperate. This partnership approach could also better coordinate infrastructure requirements and associated funding whilst delivering potential savings through joint commissioning of evidence.
- 3.11 In June 2018 the GEGJC appointed a Strategic Planning Coordinator for the County. The purpose of this new post was to work towards better planning coordination in the County. Progress to date has involved:
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- Establishing the governance and working arrangements for the project including the setting up of a Leaders Board (which consists of Leaders of all the District Councils, the Leader of the County Council and LEP representatives) and an associated officer group under the auspices of the GEGJC.
  - Considering options for greater coordination of plan making, from preparing joint plans to developing a statement of common ground
  - Commissioning joint evidence base studies
  - Developing a strategic planning framework for Gloucestershire to 2050, through the preparation of a Gloucestershire Statement of Common Ground
- 3.12 In addition to discussions through joint working arrangements, officers hold individual meetings with officers from neighbouring authorities to discuss specific cross-boundary issues on a regular basis.

### **Co-operation with Prescribed Bodies**

- 3.13 Throughout the Local Plan process there has been liaison and cooperation with the statutory bodies through the consultation process as well as through specific evidence gathering projects.
- 3.14 The Council has worked closely with Highways England to assess the transport implications of spatial strategy options and, latterly, to undertake an agreed approach towards traffic modelling the spatial development strategy and the consideration of potential mitigation measures relating to the strategic allocations.
- 3.15 Natural England has been closely involved with, and helped shape, the production of the Habitat Regulations Assessment
- 3.16 Representations have been received throughout the Plan making process from the Environment Agency, Historic England, Highways England and Natural England. The Council has worked closely with these organisations to resolve any outstanding issues.
- 3.17 The Council also worked with the NHS and Gloucestershire Clinical Commissioning Group to help shape health and wellbeing policies and with the Marine Management Organisation through various partnerships on the South West Marine Plan and the implications for policy within Stroud District. The Council has regular dialogue with Homes England regarding the Council's new homes programme, the regeneration of brownfield sites and the future delivery of strategic sites within the emerging Stroud District Local Plan.
- 3.18 Infrastructure is an important and integral part of planning for sustainable development and there has been a co-ordinated approach on this matter with a full range of infrastructure providers. Engagement throughout the process has established the infrastructure required to support development identified in the Plan across the District.
- 3.19 Consultation documents and evidence base were made available to view and for comment, though not all of the prescribed bodies commented at each stage.
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## Wider partnerships

- 3.20 All Gloucestershire authorities are engaged in widespread partnership working over a number of topics and geographical areas, which informs the development of spatial plans.
- 3.21 A summary of the main partnerships is set out below. Further information on partnerships and joint working on the main strategic issues can be found in chapter 5.

Name	Purpose and outcome/benefit	Organisations involved
Cotswolds AONB	<p>Co-ordinated response to protect landscape quality of the Cotswolds AONB.</p> <p>Preparation of Management Plan and guidance and policy interpretation through Local Plans.</p>	Cotswolds Conservation Board, Cheltenham, Cotswold, Stroud, Tewkesbury districts, Gloucestershire County Council, Oxfordshire, Somerset, Warwickshire and Wiltshire local authorities, Natural England
Local Nature Partnership	To coordinate policy and management programmes to deliver improvements to Gloucestershire biodiversity.	Cheltenham, Cotswold, Forest of Dean, Gloucester, Stroud, Tewkesbury districts, Gloucestershire County Council, LEP, Gloucestershire Health and Well Being Board, Cotswolds Conservation Board, Natural England, National Trust, Forestry Commission, RSPB, National Farmers Union, Environment Agency.
Local Authority and Planning Biodiversity Group	<p>To consider the implications of Local Authority services and functions on biodiversity with a strong focus on planning policy and development control.</p> <p>Development and refinement of Gloucestershire Nature Map, as a blueprint for a county based ecological network and strategic Green Infrastructure Planning.</p>	Cheltenham, Cotswold, Forest of Dean, Gloucester, Stroud, Tewkesbury districts, Gloucestershire County Council
Gloucestershire Strategic Housing Partnership	To provide strategic leadership for housing within the county, including awareness raising, advocacy and sharing of information and good practice. To act as the strategic voice for Housing within the county and a one-point contact for key strategic partnerships.	Cheltenham, Cotswold, Forest of Dean, Gloucester, Stroud, Tewkesbury districts, Gloucestershire County Council, Registered Providers

Gloucestershire Rural Housing Partnership	Co-ordinated delivery of rural housing schemes.  Joint funding of Rural Housing Enabler to undertake local needs surveys and bring forward rural affordable housing sites.	District Councils (as detailed above), Registered housing providers, Gloucestershire Rural Community Council
Cotswold Tourism	Joint promotion of Cotswolds as tourism destination.  Production of annual Visitor Guide and specific thematic promotion initiatives. Guidance and support to tourism businesses. Local assessment scheme for accommodation standards.	District Councils (as detailed above), GFirst LEP, Cotswolds Conservation Board
Gloucestershire Health and Wellbeing Board	To improve the co-ordination of commissioning across Health, Social Care and Public Health services and to support each other to improve the health and wellbeing of the local population and reduce health inequalities.	District Councils (as detailed above), Gloucestershire County Council, Gloucestershire Clinical Commissioning Group, NHS Foundation Trust, NHS England, Primary Care, GFirst LEP, Deputy Police and Crime Commissioner, Gloucestershire Fire Service
Severn Estuary Coastal Group (SECG)	To prepare Shoreline Management Plans for the Estuary area from upstream of Lavernock Point west of Cardiff and Brean Down in Somerset.	Local authorities, Environment Agency, Welsh Environment, Marine Management Organisation, IDB's, Natural England, other coastal groups
Association of Severnside Relevant Authorities (ASERA)	To discharge collectively statutory duties in respect of the nature conservation designations on the Severn Estuary.	Local authorities, Natural England, Marine Management Organisation

### Evidence gathering

- 3.22 Outside the formal consultation process, the Council has worked extensively through its evidence base work, which has been undertaken to inform the development of the Plan at various stages and to help ensure that the strategy and its policies are robust. Such cooperation is not essential for every facet of the Plan but there are several areas where cooperation and collaboration are crucial to planning effectively.
- 3.23 The following table sets out a range of evidence that has been undertaken jointly with other authorities and/or prescribed bodies to inform the Draft Local Plan.

<b>Title</b>	<b>Partners</b>	<b>Purpose</b>	<b>Published</b>
Gypsy and Traveller Accommodation Assessment	Cheltenham, Cotswold, Forest of Dean, Gloucester, Stroud, Tewkesbury districts, and Gloucestershire County Council	To consider the need for Traveller and Travelling Showpeople accommodation	March 2017
Strategy Options Transport Discussion Paper	Stroud, Gloucestershire County Council, Highways England	To discuss the transport impacts of spatial options	July 2018
Cotswolds Beechwoods Visitor Survey 2019	Cheltenham, Cotswold, Gloucester, Stroud, Tewkesbury districts, and Gloucestershire County Council	To inform the Habitats Regulations Assessments of emerging local plans	November 2019
The Assessment of Strategic Development in Parts of Gloucestershire	Cheltenham, Cotswold, Forest of Dean, Gloucester, Stroud, Tewkesbury districts, and Gloucestershire County Council	To inform the development of spatial and site options for emerging local plans	Interim Assessment October 2019 Final Report May 2020
Gloucestershire Economic Needs Assessment	Cheltenham, Cotswold, Forest of Dean, Gloucester, Stroud, Tewkesbury districts, and Gloucestershire County Council	To establish the quantum and type of employment land for emerging local plans	August 2020
Gloucestershire Local Housing Needs Assessment	Cheltenham, Cotswold, Forest of Dean, Gloucester, Stroud, Tewkesbury districts, and Gloucestershire County Council	To establish the quantum of housing and house types for emerging local plans	September 2020
Traffic Forecasting Report	Stroud, Gloucestershire County Council, Highways England + South Gloucestershire Council	To assess the impacts of development on the highway network and to assess mitigation options	March 2021
Strategic Flood Risk Assessment	Stroud, Environment Agency	To assess flood risk of development sites	May 2021

3.24 More detailed discussions on these studies and their relevance to strategic issues can be found in chapter 5. In addition to these joint studies, Natural England has been closely involved with, and helped shape, the production of the Habitat Regulations Assessment.

## 4. STATEMENTS OF COOPERATION

### Context

- 4.1 The specific requirement for local planning authorities to produce statements of common ground to highlight agreement on cross boundary issues was introduced in July 2018 with the publication of the amended NPPF.
- 4.2 However, joint statements of progress on strategic planning matters have been produced within Gloucestershire for a number of years. To support the preparation of the current cycle of adopted local plans in Gloucestershire, a Gloucestershire Memorandum of Understanding (MoU) was agreed in 2015 and subject to review in 2017.
- 4.3 A Statement of Cooperation was drafted by Stroud District Council in 2013 and agreed in 2014 between Cheltenham, Gloucester, Stroud and Tewkesbury councils to address the issue of unmet housing needs within their areas (see section 5).

### Gloucestershire Statement of Common Ground

- 4.4 In March 2019 Stroud District Council's Environment Committee resolved to support the development of a broad Strategic Planning Framework for Gloucestershire to 2050 and beyond, through the preparation of a Statement of Common Ground, to be prepared by the six local planning authorities, Gloucestershire County Council and the GFirst LEP.
- 4.5 An initial Draft Gloucestershire Statement of Common Ground (GSoCG) (May 2020) was produced by a Strategic Planning Coordinator for the County, appointed by GEGJC. Since May 2020, various revisions to the document have been subject to further discussions at a Leaders Board set up to progress strategic planning co-ordination across Gloucestershire and at GEGJC.
- 4.6 A final draft version was approved at the District Council's Environment Committee on 9 September 2021 but has yet to go through the full approval process with neighbouring authorities. It was published on the Council's website as a draft SoCG at the Local Plan's pre-submission consultation stage in May 2021.
- 4.7 The purpose of the GSoCG is:
- To identify and demonstrate where common ground exists between the parties
  - To identify and agree an action plan on the strategic spatial planning matters in Gloucestershire that require collaborative working between the parties
  - To identify in principle the potential response to addressing the strategic spatial planning matters
  - To provide the basis for a 'live' document to allow for regular updates which capture progress against responding to the strategic spatial planning matters, acknowledging that responding to the Climate emergency will be the "Golden thread" that runs through the strategic planning activities and the outputs of this GSoCG
  - To meet (in part) the requirements placed on Local Planning Authorities from the National Planning Policy Framework Revised 2019 (the Framework) to discharge the statutory 'Duty-to-Cooperate' as part of their local plan preparation
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- To respond to the GEGJC to develop a statement of common ground as the basis to consider the development of a Gloucestershire Spatial Development Strategy.

4.8 The SOCG defines the key strategic matters for Gloucestershire where cooperation is needed and includes a series of 34 high level agreements dealing with these matters including addressing the climate and ecological emergencies, housing and economic needs, transport provision and infrastructure delivery.

4.9 Reaching agreement on how to address these strategic planning matters is the start of the GSoCG process. Action needs to be taken to address the matters arising from these agreements. The GSoCG proposes therefore that an Action Plan is developed to identify the actions to be taken, those responsible for taking that action, and a timeframe and budget to address the actions.

### Statements of Common Ground for the Stroud District Local Plan

4.10 The GSoCG plans for additional or supplementary SoCGs between relevant parties when individual local plans are being progressed.

4.11 A SoCG between the Gloucestershire local planning authorities relating to Gypsy, Traveller and Travelling Showpeople matters was approved in May 2021 within the context of the Gloucester City Plan and remains up to date. Whilst Stroud District Council did not sign the SoCG in May 2021, the Council is happy to endorse it now.

4.12 To support the Stroud District Local Plan, and following the receipt of formal responses during the pre-submission consultation stage, a series of SoCG between the District Council and neighbouring authorities and other prescribed bodies have been prepared for the following matters:

Subject of SoCG	Partners
Strategic housing matters (DRAFT)	Cheltenham, Cotswold, Forest of Dean, Gloucester, Stroud, Tewkesbury districts
Strategic employment matters (DRAFT)	Cheltenham, Cotswold, Forest of Dean, Gloucester, Stroud, Tewkesbury districts, GFirstLEP
Strategic transport and waste and minerals matters	Stroud District Council and Gloucestershire County Council
Strategic matters (the housing requirement, employment education training & skills, Severn Estuary, transport)	Stroud District Council and South Gloucestershire Council
Strategic transport matters	Stroud District Council and National Highways
Strategic matters relating to the water environment	Stroud District Council and Environment Agency
Strategic matters dealing with biodiversity /geodiversity, landscape /natural features, soils, green infrastructure, climate change	Stroud District Council and Natural England
Strategic heritage matters	Stroud District Council and Historic England

4.13 All of the relevant SoCG are set out in the appendices.

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## 5. COOPERATION BY STRATEGIC MATTERS

- 5.1 This section identifies the main strategic and cross boundary matters and how they are being addressed.

### Housing

#### *Meeting housing needs*

- 5.2 The National Planning Policy Framework requires strategic policies relating to housing to be informed by the production of a local housing needs assessment. This should determine the minimum number of homes needed using the standard method and the size, type and tenure of housing needed (NPPF, para. 61-62).
- 5.3 In 2018 the six Gloucestershire local planning authorities jointly commissioned consultants to complete a Gloucestershire Local Housing Needs Assessment (LHNA) for the Gloucestershire Housing Market Area. A final report was published in September 2020. The LHNA adheres to the requirements of the NPPF and the associated planning practice guidance.
- 5.4 The report concludes, based on a range of indicators, that Gloucestershire forms a single housing market area (HMA). Whilst this does not preclude overlap occurring with neighbouring HMAs, from an administrative point of view, the six Gloucestershire authorities form the most appropriate grouping.
- 5.5 The principal duty to co-operate issue surrounding housing provision within Gloucestershire is related to meeting the needs arising within Gloucester and Cheltenham. It is recognised that these settlements have a limited capacity to accommodate needs within existing boundaries and that, depending upon the scale of future needs and the availability of land, development may need to be located within adjoining authority areas.
- 5.6 A Statement of Cooperation was drafted by Stroud District Council in 2013 and agreed in 2014 between Cheltenham, Gloucester, Stroud and Tewkesbury councils to set out the process and triggers by which any unmet objectively assessed needs arising from within their administrative areas could be considered through a review of the Joint Core Strategy and the Stroud District Local Plan.
- 5.7 Subsequently the adopted Stroud District Local Plan included within Core Policy 2 a commitment to give “due consideration to the need to assist other local planning authorities in this housing market area in meeting their unmet objectively assessed development and infrastructure needs, including through an early review of this Local Plan, to ensure that any shortfalls that may arise in the delivery of housing and employment growth (as identified through the other authority’s local plan process) are provided for in sustainable locations.” In the light of these unmet needs, the District Council decided to commence an early review of the Stroud District Local Plan in 2017.
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- 5.8 In December 2017, the Gloucester, Cheltenham and Tewkesbury Core Strategy was adopted. The JCS recognises that “Gloucester has a good supply of land for the short to medium term that will enable it to meet its requirements to at least 2028/9. This will allow adequate time for an early review of the plan to explore further the potential to meet Gloucester’s needs in the longer term towards the end of the plan period. This would allow the consideration of additional development options that may become available, both within and outside the JCS area. This could include the unlocking of further development opportunities within the urban area, as well as potential new urban extensions in Tewkesbury Borough and Stroud District or elsewhere in the housing market area.” (JCS, para. 3.2.16)
- 5.9 In December 2018 Cheltenham Borough, Forest of Dean District, Gloucester City, Stroud District and Tewkesbury Borough councils jointly commissioned an assessment to inform the search for suitable and available strategic development land beyond the existing settlement boundaries in the study area. This was intended to inform local plan and JCS reviews and the preparation of an informal spatial framework for the whole of Gloucestershire in the longer term, but was also intended to consider the matter of accommodating Gloucester’s longer term housing needs and the Interim Report published in October 2019 was prepared specifically to address this issue.
- 5.10 The Interim Report identified 7 assessment areas as having the highest accessibility to Gloucester (1 area within Gloucester, 3 areas within Stroud and 3 areas within Tewkesbury) and an additional 3 areas (all within Tewkesbury) that currently have lower accessibility to Gloucester but which may be able to be improved and achieve similar accessibility levels to those outlined above, following investment associated with potential development.
- 5.11 The Final Report published in May 2020 makes the point that whilst the Assessment “provides an indication of the potential planning merits of development options it does not provide an evaluation of the relative merits of development options overall i.e. it does not provide an overall ranking of options...the preferred balance to be struck in relation to different topics is a matter to be assessed in relation to the defined priorities of the County’s Local Plans and the JCS” (para. 3.20).
- 5.12 The identification of the most sustainable option to meet Gloucester’s future needs therefore needs to be assessed through the plan making process. Unfortunately, the JCS review process has seen some delay. Whilst the Issues and Options consultation commenced in October 2018, a Preferred Options consultation had not been completed by the time the Pre-Submission Stroud Local Plan was published in May 2021 and the JCS response to the Pre-Submission Stroud Local Plan now envisages Reg. 18 consultation later in 2021 with a Reg.19 consultation towards the end of 2022.
- 5.13 To avoid significant delay with the Stroud Local Plan, the District Council took the decision in 2019 to safeguard a site at Whaddon on the edge of Stroud (within one of the identified assessment areas in the Interim Report – area 32) to contribute to meeting Gloucester’s needs, should it be required and provided it is consistent with the approved strategy of the JCS review. Due to delay with the JCS, and consequential uncertainty regarding both the quantum of unmet needs likely to arise from Gloucester City and an assessment of alternative site options within the context of a preferred spatial strategy, this position has been confirmed in the Pre-Submission Draft Local Plan.
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- 5.14 The JCS authorities have supported this approach in their Reg.19 response and stated that “The next stage of the JCS process will present the preferred strategy for the review and identify reasonable alternatives to provide for development needs. As part of this process an urban capacity study will be undertaken in the coming months, from which it will be established Gloucester’s potential housing shortfall” (JCS Reg.19 response para. 9).
- 5.15 It is hoped that by the time of the examination hearing sessions into the Stroud Local Plan, the JCS Core Strategy Review will have progressed sufficiently for these issues to be capable of resolution. The JCS authorities have agreed to make best endeavours to ensure that these actions have advanced sufficiently before the start of the Stroud District Local Plan examination hearing sessions in early 2022 to inform the debate.
- 5.16 Subject to confirmation that there is a housing shortfall of a scale requiring strategic allocation in another local authority area, and subject to confirmation that the JCS preferred strategy demonstrates that the site at Whaddon is a preferred sustainable location having considered all reasonable alternatives, Stroud District Council will accept a modification to the Stroud District Local Plan specifically allocating the site at Whaddon to help address the unmet needs of Gloucester.
- 5.17 In February 2021 Gloucester City indicated that the level of unmet housing needs for Gloucester for the new Plan period could be between 5,631 and 6,131 although further urban capacity work would be carried out through the JCS review process. The Whaddon site is identified for at least 3,000 dwellings. The District Council expects that any remaining shortfall should be considered within the context of the capacity of the other 9 areas (1 in Gloucester, 2 in Stroud and 6 in Tewkesbury) indicated as being the most accessible to Gloucester in the conclusions of the above Assessment, and any other specific sites promoted at Gloucester through the JCS review.
- 5.18 The JCS authorities in their Reg.19 response have identified that there are a number of other allocated housing sites on the Gloucester fringe which may provide for unmet Gloucester/JCS needs if required and in accordance with the JCS Review.
- 5.19 In the event that the scale of unmet housing needs from Gloucester may require the allocation of other sites in adjoining local authority areas, the parties will commission jointly an assessment of the relevant sustainability of all reasonable alternative site options within the context of the latest adopted and emerging local plans framework and will seek to allocate the most sustainable form of development through the relevant local plan review process.
- 5.20 Cotswold District Council and Forest of Dean District Council did not make representations at the Stroud District Local Plan Reg.19 stage and have not identified any issues with the Stroud District Local Plan relating to strategic housing matters.
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- 5.21 South Gloucestershire Council is part of the West of England Combined Authority (WECA) area. WECA is currently preparing a Spatial Development Strategy and has recently stated that the scale of need is extremely challenging in terms of both constraints and deliverability in the West of England, and they cannot therefore rule out that discussions on unmet need will need to take place. Such discussions if needed would be likely timed towards the end of 2021. The District Council and South Gloucestershire Council agree to continue to work together to understand how the housing needs arising from within the WECA should be accommodated.
- 5.22 The relevant authorities agree that Stroud District Council, in preparing the Stroud District Local Plan (2020-2040), has engaged proactively and positively with neighbouring authorities on strategic planning matters relating to housing through the Duty to Cooperate.

*Meeting the accommodation needs of travellers and travelling showpeople*

- 5.23 The Gloucestershire local planning authorities, in collaboration with Gloucestershire County Council, jointly commissioned a county-wide Gypsy and Traveller Accommodation Assessment (GTAA), which was published in 2017, setting out needs between 2016 and 2031.
- 5.24 In seeking to meet needs, the six local planning authorities agreed in May 2021 that “there are no deliverable sites within the administrative area of Gloucester City and that consequently, there are currently unmet needs relating to the Gypsy, Traveller and Travelling Showpeople communities. It is therefore necessary to consider how neighbouring authorities can assist with addressing these unmet needs” (Statement of Common Ground, para. 2.3).
- 5.25 The six local planning authorities have agreed to update the GTAA to re-base needs from 2021 and initial results are expected by October 2021. Subsequently, the local planning authorities have agreed to commission a Gypsy, Traveller and Travelling Showpeople Site Assessment Study (SAS) should the GTAA identify additional needs.
- 5.26 In the meantime, the City Council has agreed to “continue to actively investigate opportunities to meet unmet needs within the administrative area, where they arise” (Statement of Common Ground, para. 4.1 (1)). The District Council, to demonstrate its commitment to working to meet Gloucester’s unmet needs without delaying unnecessarily the Stroud District Local Plan, has identified the potential for the land at Whaddon site to accommodate 8 plots for travelling showpeople, 50% of the unmet needs currently identified by the City Council.
- 5.27 Subject to further evidence on needs and supply, the District Council would be happy to accept a modification allocating plots within the Whaddon site to help address the unmet travelling showpeople needs of Gloucester.
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## **The Economy and Employment**

- 5.28 The National Planning Policy Framework requires strategic policies relating to the economy and employment to “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration” (NPPF, para. 82) and to be the result of effective engagement with relevant bodies including Local Enterprise Partnerships (NPPF, para. 25).
- 5.29 GFirst LEP is the Local Enterprise Partnership (LEP), set up by Government in 2011, that covers the county. The LEP’s role is to provide strategic economic leadership for their areas, bringing public and private sector partners and their resources together around a common set of goals, determining local economic priorities to drive economic growth and the creation of local jobs.
- 5.30 The boundaries of the GFirstLEP area coincide exactly with the administrative boundaries of Gloucestershire and this has enabled a high degree of integration between the LEP and the Gloucestershire authorities. The GFirst LEP Board includes the Leader of Gloucestershire County Council and Stroud District Council (representing the 2nd tier authorities in the area). In 2014 a Gloucestershire Economic Growth Joint Committee (GEGJC) was established as a statutory joint committee made up of the seven Gloucestershire Councils, to provide the formal link between local government and the LEP Board, providing a mechanism for collective and binding decisions between councils and for local democratic oversight of the use of the local growth fund.
- 5.31 The District Council has input positively into the contents of both the GFirstLEP produced Strategic Economic Plan (SEP)(2014 and 2018) and the draft Local Industrial Strategy (LIS) (2019) and has used these documents to develop the Local Plan development strategy.
- 5.32 The SEP aims to provide good quality space in areas of good connectivity for businesses. The M5 corridor is identified as a Growth Zone, with sites close to motorway junctions identified as having the potential to deliver employment land attractive to new businesses and to create opportunities for existing businesses to grow. The aim is to realise the potential of this opportunity by operating a fast-track planning process; by ensuring the right infrastructure in proximity to the sites; and by exerting influence over the type of employment to be created within these locations.
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- 5.33 The LIS sets out the LEP's strategy to boost economic productivity in Gloucestershire and to guide funding investments made through both the LEP and other national schemes. The LEP's ambition through this strategy is to promote Gloucestershire as a "magnet county" able to successfully attract and retain talent in the region. The LIS identifies Gloucestershire's particular focus for growth surrounding its existing industrial strengths including: advanced manufacturing and engineering; aerospace; agri-tech; cyber-tech; and green growth. To underpin this strategy, the LIS sets out the importance of investing in people in order to attract and retain a talented workforce and realise the regions ambition as a 'magnet county'. A particular issue Gloucestershire faces is its ageing population and the strategy therefore looks at various ways to retain and attract young people. Another important element of this strategy covers the need to improve connectivity across the region, considering investment in cycle links, rail projects and becoming a pilot for innovative technology driven transport solutions and high-quality digital infrastructure.
- 5.34 The principal duty to co-operate issue surrounding the economy and employment within Gloucestershire is how the local authorities can work together to deliver the clear vision and strategy established by the SEP and more recently articulated by the emerging LIS to the benefit of Gloucestershire as a whole.
- 5.35 In 2019 the six local planning authorities and Gloucestershire County Council jointly commissioned an Economic Needs Assessment (ENA) for Gloucestershire. This ENA provides a high-level assessment of the Gloucestershire economy, investigating the economic potential of Gloucestershire and identifying realistic yet aspirational growth scenarios based on economic forecasts and modelled scenarios for the delivery of employment land (B class uses).
- 5.36 The ENA concludes that on the balance of evidence, and adopting a 'best fit' approach to local authority boundaries, the six Gloucestershire districts can be considered to form a single functional economic market area (FEMA). The ENA provides a baseline assessment of the local and regional economic dynamics in Gloucestershire and examines the local commercial property markets to set out requirements by sector and geographical area. An extensive examination of economic forecasts and policy drivers leads to the development of a number of labour demand and labour supply scenarios to establish future employment land requirements.
- 5.37 In preparing the Pre-Submission Stroud District Local Plan, the Council has sought to reflect the growth aspirations of the GFirstLEP by seeking to meet two of the highest scenarios for employment land based upon the expected labour supply and a labour demand growth scenario based on supporting growth in the key LIS sectors. To support the key LIS sectors, the Plan identifies six key segments of market demand set out in the ENA and the development strategy and strategic allocations seek to deliver on these requirements.
- 5.38 GFirstLEP did not make representations at the Local Plan Reg.19 stage but the GFirstLEP's Construction and Infrastructure Business Group did respond to the 2019 Draft Plan Reg.18 stage to state that the employment strategy was supported by the LEP and that "The Local Plan is considered to provide a good range and distribution of employment sites across the District that should help diversify the employment needs of the District and meet future employment trends."
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- 5.39 The JCS authorities have supported the Local Plan approach towards the economy and employment land in their Reg.19 response, stating that the strategy aligns with the strategy of the adopted JCS, the aspirations of the SEP and the emerging LIS.
- 5.40 The JCS authorities have also raised in their response the potential for the proposed employment land supply in Stroud District to address any unmet Gloucester/JCS needs, should they be required and in accordance with the JCS Review.
- 5.41 Neither the adopted JCS, nor any dialogue with the JCS authorities to date, has identified any likelihood of any shortfalls within the JCS area in terms of employment land supply and the Local Plan consequently has not sought to address this issue. However, the District Council is mindful of its duties and responsibilities and is happy to work with the JCS authorities through the JCS Review to examine whether there is likely to be a shortfall in employment land provision requiring authorities within the FEMA to assist.
- 5.42 In the event that the scale of unmet employment needs from Gloucester may require the allocation of other sites in adjoining local authority areas, the parties will commission jointly an assessment of the relevant sustainability of all reasonable alternative site options within the context of the latest adopted and emerging local plans framework and will seek to allocate the most sustainable form of development through the relevant local plan review process.
- 5.43 Cotswold District Council and Forest of Dean District Council did not make representations at the Stroud District Local Plan Reg.19 stage and have not identified any issues with the Stroud District Local Plan relating to strategic employment matters.
- 5.44 The parties agree that Stroud District Council, in preparing the Stroud District Local Plan (2020-2040), has engaged proactively and positively with neighbouring authorities on strategic planning matters relating to employment through the Duty to Cooperate.
- 5.45 A particular strategic project worth commenting on is the UK Atomic Energy Authority's proposed world first prototype fusion power plant and associated 'eco-system' of facilities, businesses and training facilities. South Gloucestershire Council, Stroud District Council and Gloucestershire County Council are partners to the Western Gateway joint nomination of sites at Oldbury and Berkeley (known as Severn Edge). As a part of this the authorities along with other partners including Business West, Nuclear SW, South Gloucestershire and Stroud College, Magnox and Horizon Nuclear Power are working closely together and meeting regularly to maximise opportunities and address constraints that this project may bring. Given the scale of the proposed project, there are a range of socio-economic, environmental and transport opportunities and implications which are being jointly addressed by the partners to the project.
- 5.46 UKAEA has recently announced that Severn Edge is on a shortlist of 5 sites and a ministerial decision is expected by the end of 2022. However, the parties agree that should the fusion project not proceed in our geography, then the Oldbury and Berkeley sites may be suitable for other high quality employment uses.
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## Transport

- 5.47 The NPPF requires transport issues to be considered from the earliest stages of plan-making. The planning system should actively manage patterns of growth to realise opportunities from existing and proposed transport infrastructure, to promote walking, cycling and public transport and to address impacts on transport networks and the environmental impacts of traffic and transport infrastructure. “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes (NPPF, para. 104-105).
- 5.48 Transport assessment work on the Stroud District Local Plan has been carried out at a number of key stages in the plan making process and has involved partnership working with transport and planning authorities and key stakeholders. The principal transport evidence includes:
- Strategy Options Transport Discussion Paper (July 2018)
  - Sustainable Transport Strategy (February 2021)
  - Traffic Forecasting Report (TFR) (March 2021)
  - Infrastructure Delivery Plan (IDP) (May 2021)
- 5.49 The principal duty to co-operate issue relates to working in partnership with transport and planning authorities and National Highways (formerly Highways England) to ensure that the transport network can accommodate the required housing and employment growth levels for Stroud District (and unmet needs arising from Gloucester City) in a sustainable manner which limits the need to travel, supports a choice of transport modes, makes the most of the existing strategic transport network and delivers mitigation where required.
- 5.50 Particular transport cross-boundary matters relate to: the transport network within the Gloucester fringe where impacts from Stroud and JCS related growth combine; the opportunities for new public transport and cycling and walking connections on the South Gloucestershire/Stroud boundary; and existing and likely future capacity issues at M5 Junction 12 (Gloucester fringe) and M5 Junction 14 (located within South Gloucestershire).
- 5.51 A Stroud District Local Plan Transport Group was set up in 2017 to progress partnership working on transport matters. A core group of Stroud District, Gloucestershire County Council and National Highways met regularly during the plan making process to develop the above studies and to discuss key issues and potential mitigation measures. South Gloucestershire Council was invited periodically to input into the assessment work and to discuss key issues and potential mitigation measures, especially relating to impacts on and mitigation measures for M5 Junction 14.
- 5.52 During the early stages of plan preparation, whilst South Gloucestershire Council was preparing with neighbouring authorities the West of England Joint Strategic Plan (JSP), the District Council worked closely with South Gloucestershire Council, National Highways and potential developers to monitor levels of growth and identify mitigation schemes for M5 Junction 14 and related roads (A38/B4509). A Statement of Common Ground between the two councils was signed in 2018. Since the withdrawal of the JSP, South Gloucestershire Council has been reviewing growth options within their area, but discussions continue on appropriate mitigation schemes for M5 Junction 14.
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- 5.53 Other relevant transport related joint working has included: District Council inputting into the latest Gloucestershire Local Transport Plan; working with Gloucestershire County Council to deliver improvements to the strategic cycling and walking network within the District; and seeking improvements to the rail network through membership of the Gloucestershire Community Rail Partnership.
- 5.54 At the Reg.19 stage National Highways confirmed their acceptance of the TFR assessment methodology and findings which, with the IDP, “provide a sound basis for the identification of necessary infrastructure improvements to SRN junctions to accommodate projected growth.” National Highways also confirmed that they will work collaboratively with the District Council and neighbouring authorities to explore funding opportunities and delivery routes.
- 5.55 Gloucestershire County Council has confirmed that the TFR report reflects all of their comments and inputs and that the report accurately presents the findings of the modelling assessment. Their Reg.19 representations concentrate on remaining concerns they have with two specific sites rather than with the wider process.
- 5.56 South Gloucestershire Council references ongoing cooperation through Local Plan officer meetings, the Sustainable Transport Strategy and Local Transport Group and welcomes the recognition of capacity issues at M5 J14, but seeks fuller investigation of the impacts and detailed proposals for mitigation, through further joint working between Stroud District Council, National Highways, South Gloucestershire Council and WECA.
- 5.57 Stroud District Council agrees to work together with National Highways and with South Gloucestershire Council, Gloucestershire County Council and developers, to determine appropriate infrastructure at M5 junctions 12, 13 and 14, safeguard land to enable the intervention, detail the triggers and timing for interventions, and devise a funding and delivery strategy for identified improvements.
- 5.58 There are two gliding clubs within the District, one of which is partly within adjoining Cotswold District Council. Both have agreed safeguarding areas. The regulation and management of air safety in the United Kingdom is the responsibility of the Civil Aviation Authority. During the preparation of the adopted Local Plan (2015) text was added to set out the requirements of planning proposals in terms of air safety and aerodrome operational issues, which has been rolled forward into the new Stroud District Local Plan. The District Council has consulted with the Civil Aviation Authority at each stage during the development of the new Local Plan and no issues have been raised.

### **The Natural Environment**

- 5.59 Stroud’s natural environment is one of its greatest assets and includes some of Europe and the UK’s most significant sites, which are protected by national policy and statutory legislation. Work on conserving and enhancing this environment includes much joint working across administrative boundaries and involving bodies such as Natural England and the Environment Agency.
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- 5.60 Stroud District lies on the western edge of the Cotswolds Area of Outstanding Natural Beauty (AONB), which extends from Wiltshire and Somerset in the south, through Gloucestershire and Oxfordshire to Worcestershire and Warwickshire to the north. As well as being of national landscape importance, the Cotswold escarpment supports many rare species of plants (including several varieties of orchid) and is an exceptional area for invertebrates. There are some disused limestone mines which are used as winter roosts by several bat species.
- 5.61 The Severn Estuary, extending to include a number of Welsh and English authorities including South Gloucestershire, Forest of Dean District and Stroud District, is the largest example of a coastal plain estuary in the UK, covering an area of almost 74,000 ha, which accounts for approximately 30% of the UK's Natura 2000 resource for estuaries, by area. The Severn Estuary supports a wide range of nationally and internationally important habitats and species, especially wintering wildfowl and breeding waders. It is a vital link in the route of bird migration that stretches from Siberia to Africa.
- 5.62 To account for this exceptional natural environment diversity and interest, this section has been sub-divided into three broad strategic topic areas with biodiversity, landscape and water resources/flood risk described.

### ***Biodiversity***

- 5.63 The NPPF requires that plans should both protect and enhance biodiversity and geodiversity by safeguarding components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation. Plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
- 5.64 The Council closely works with the Gloucestershire Local Nature Partnership (GLNP) on these matters. The GLNP is formed of over 30 organisations from public, private and third sector bodies from across the county, all working together to recognise the importance of embedding nature's value in local decisions for the benefit of nature, people and the economy. The District Council sits on the Board of the partnership to assist providing a strong and innovative voice for the environment sector and Local Nature Partnerships are seen by Defra as the key figure in the local delivery of the Government's 25 Year Environment Plan. As part of supporting Defra to deliver the 25 Year Environmental Plan locally the District Council through the GLNP is currently working on producing a local Nature Recovery Network, whilst also collaborating to develop a national methodology.
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- 5.65 The Gloucestershire LNP's Mission Statement is "To improve the prospects for Gloucestershire's natural environment while demonstrating its vital role in our health & well-being, its significant contribution to a thriving economy and to a better quality of life for all". The GLNP has a number of focus and working groups to progress specific projects. These include representatives from Stroud District Council to develop and progress a strategic approach to Green Infrastructure, Nature Recovery and Natural Thinking for example. In terms of Natural Capital the GLNP is exploring ways to leverage multiple funding and investment streams to enhance the county's natural assets, leading to increased economic, social and environmental resilience. The District Council is contributing to developing a County-wide approach to delivering biodiversity net gain planning requirements. Priorities for offsite delivery will be guided by the Nature Recovery Network. The Council through the GLNP is developing a map which will show the relative value of Natural Capital in the county, and where opportunities exist to enhance ecosystem services.
- 5.66 The District Council has adopted The Gloucestershire Tree Strategy. This was co-created by many partners of the GLNP to guide a strategic, joined-up, best practice approach to tree planting and woodland creation in Gloucestershire.
- 5.67 Green Infrastructure (GI) was embedded in the Gloucestershire Building with Nature initiative supporting the inception and development of this national benchmark for the implementation of high-quality green infrastructure. Stroud District Council was a pilot local authority in developing the Building with Nature initiative working with the Gloucestershire Wildlife Trust and University of the West of England during 2013-16. Stroud District Council were a signatory to the Green Infrastructure Pledge to deliver GI across the County and is actively reviewing the adopted Gloucestershire Strategic Framework for Green Infrastructure (2015) to take account of new evidence.
- 5.68 The Local Authority Planning and Biodiversity Group is a standalone group of officers from each of the local planning authorities in Gloucestershire plus representatives from Natural England and Gloucestershire Wildlife Trust. In general, it aims to determine how local authorities can help to protect and enhance biodiversity whilst carrying out their functions or delivering services. The Group has monitored planning case studies for best (and worse) practice as well as shared information and facilitated joined up approaches. It is actively involved in improving the information available to local authorities and held by the Gloucestershire Centre for Environmental Records (GCER) on the natural environment. The District Council has a Service Level Agreement with GCER which operates in partnership with a range of statutory and voluntary conservation interests and Priority Clients.
- 5.69 The District Council undertakes the administration and allocation of funding for the current adopted mitigation strategies for Rodborough Common and the Severn Estuary. Specialist advisors from a range of interested organisations, including Natural England, sit on Conservation Panels that exchange information, assist identifying projects and priorities (that comply with the identified projects in the respective adopted mitigation strategies) as well as jointly funding opportunities.
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- 5.70 Currently Stroud District Council is working with other Gloucestershire local planning authorities to review Severn Estuary visitor pressures, with potential to jointly produce a visitor survey and a future mitigation strategy. Natural England is working with the councils and using Stroud District's experience and expertise. We are exploring opportunities to work with South Gloucestershire to develop these wider partnership arrangements. In addition to this, the joint commissioning of work to produce a Cotswolds Beechwoods Recreation & Mitigation Strategy is now well advanced and involves closely working between Stroud District, Natural England and neighbouring Gloucestershire councils to the north of the District.
- 5.71 Since 2016 a range of meetings have regularly taken place with Natural England, Footprint Ecology and the Environment Agency (South Midlands and Wessex area teams) to discuss issues around potential development identified in the Stroud District Local Plan and any potential impacts on the natural environment. Some of these meetings were specifically with site promoters and their agents to discuss specific impacts and proposed mitigation such as the creation of green infrastructure networks, SANG and new Nature Reserve areas. There was a need to ensure holistic thinking on a range of interrelated matters such as visitor pressure, flood defence, drainage, coastal squeeze and wildlife interests for example. Additional monitoring work by consultants continues to progress. This includes bird population analysis and research on functionally linked land to support wildfowl interests on the Estuary for example.
- 5.72 Stroud District Council has worked closely with Natural England in particular to develop the policies and proposals contained within the Stroud District Local Plan and a SoCG demonstrates how the District Council has engaged proactively and positively with Natural England on biodiversity and related matters during this process.

### ***Water Resources and Flood Risk***

- 5.73 Section 10 of the NPPF provides guidance on coastal change, flooding and climate change. This has been updated in July 2021 where aspects of policy concerning planning and flood risk have been clarified. Appendix 3 on types of development acceptable in flood risk zones became part of the NPPF rather than as guidance. The NPPF emphasises local authorities should steer new development to areas with the lowest risk of flooding from any source.
- 5.74 The Severn River Basin has a very special environment - from the uplands of Wales, down through the valleys and rolling hills, to the lowlands. It includes Areas of Outstanding Natural Beauty, a National Park and other features of national and international importance. Water supports these landscapes and their wildlife and it is vital to the livelihoods of those who live and work there. The River Severn flows, together with its tributaries within South East Wales, Avon, Gloucestershire and Somerset, into the Severn Estuary. This includes the catchments of the rivers Avon and Frome within Stroud District. The Estuary has a high tidal range, around 50 feet (15 4m) and is well known for its tidal bore seen on the tidal reaches of the River Severn.
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- 5.75 There has been great progress in protecting these natural assets and cleaning up many of the water environment problems that people have created in the past. However, a range of challenges still remain including addressing pollution from agriculture, other rural activities, the water industry sewage works and urban uses; responding to climate change and mitigating and adapting to increased flood risk. These challenges require a multi-agency approach and cooperation between authorities across the Severn River Basin.
- 5.76 Stroud District Council is a member of the Severn Estuary Partnership (SEP) (together with adjacent local authorities, Environment Agency and Natural England) which is an independent, estuary-wide non-statutory initiative led by local authorities and statutory agencies, hosted by Cardiff University. They work with all those involved in the management of the estuary, from planners to port authorities, fishermen to farmers and many more with an interest in the future of the estuary. The partnership aims to
- Facilitate effective communication across, and between, organisations and individuals across both sides of the Estuary
  - Establish and embed a set of 'common principles' for sustainable estuary use via Partners' strategies, policies and action plans
  - Act as a co-ordinating body to assist the effective and efficient delivery of agreed estuary-wide actions
  - Promote and publicise the estuary at a local, national and international level
  - Add value and fill gaps in effective estuary management, providing extra capacity when required
- 5.77 The District Council is an active Board Member of ASERA - Association of Severn Estuary Relevant Authorities. ASERA comprises the statutory organisations around the Severn Estuary (including local authorities, Natural England and the Marine Management Organisation) that collectively manage human activities within and around the Severn Estuary International Marine Sites. The information sharing and data collection is an important element to assist informing our Habitats Regulations Assessments work such as assessing potential cumulative impacts for example.
- 5.78 The District Council is an active member of the Severn Estuary Coastal Group (SECG) (together with adjacent local authorities, Environment Agency, Natural England and the Marine Management Organisation) which works to promote sustainable shoreline management, and to facilitate the duties and responsibilities of local authorities and other organisations managing coastal protection and flood defence issues around the Severn Estuary. The group is working with Environment Agency consultants on the Shoreline Management Plan Review. SMPs provide important information for planners and regulators to plan for and manage the way that the shoreline changes over time, including assessing way that the coast will change over time and developing to manage the risks in a sustainable way over the short, medium and long term (100 years).
- 5.79 The SECG has also worked with the South West Regional Coastal Monitoring Programme (SWRCMP) that aims to provide information to assist future sustainable shoreline management, to define the magnitude of risks to the coast and to improve understanding of coastal processes and their relationship with the shoreline. Coastal and terrestrial habitat mapping has been completed to help meet obligations to conserve and enhance biodiversity under the NERC Act 2006.
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- 5.80 The District Council also works with the Gloucestershire Severn Estuary Stakeholders (Glos SES) which was formed in 2011 to promote information exchange and partnership working between all stakeholders with an interest in water and flood risk management issues relating to land and settlements from the first Severn Crossing to north side of Gloucester City. It was considered that the issues in this area are different from those in the wider mouth of the estuary and need to be considered separately and in detail. The Gloucestershire Severn Estuary Stakeholders currently include the Canal and River Trust, Country Land and Business Association, English Severn and Wye Regional Flood and Coastal Committee, Environment Agency, Frampton Court Estate, Gloucestershire County Council, Gloucestershire Farming and Wildlife Advisory Group, Gloucestershire Wildfowlers Association, Lower Severn Internal Drainage Board, Minsterworth Parish Council, Natural England, National Farmers Union, Severn Estuary Partnership, Severn Voice (representing the parishes from Slimbridge to Elmore), Stroud District Council, Forest of Dean District Council, The Berkeley Estate and the Wildfowl and Wetlands Trust.
- 5.81 With this background, the District Council (with its consultants JBA Consulting) has been working with the Environment Agency and other stakeholders to undertake a Strategic Flood Risk Assessment (SFRA) Level 2 assessment of site options identified for potential allocation within the emerging Stroud Local Plan. This builds upon the Level 1 SFRA (2008) and Level 2 SFRA (2012 - 2014) for Stroud by providing updated information on surface water management and Sustainable Drainage Systems (SuDS), guidance for site-specific Flood Risk Assessments (FRAs) and opportunities to reduce flood risk to existing communities within the District, in light of the revisions to national and local planning policy and guidance. The SFRA also considers the impact of climate change on flood risk in the future and contains an assessment of the cumulative impact of development as well as examining risks from all sources of flooding. A consequence of recent NPPF changes is that the Council is continuing its dialogue with the Environment Agency to resolve detailed policy matters as well as seeking formal sign-off of the SFRA2.
- 5.82 Stroud District Council has worked closely with Environment Agency in particular to develop the policies and proposals contained within the Stroud District Local Plan and a SoCG demonstrates how the District Council has engaged proactively and positively with the Environment Agency on water resources and flood risk and related matters during this process.

### ***Landscape***

- 5.83 Stroud District embraces a diversity of landscape character from the open and exposed plateau landscapes of the Cotswolds and the hanging and sheltered valleys along the escarpment edge, to the expansive landscape of the Severn Estuary. About half the District is included in the Cotswolds AONB a nationally important high quality landscape. The lowland landscapes of the Severn Vale to the west of the escarpment edge, are subtle and diverse, but remain important at a local level and when viewed from the escarpment edge.
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- 5.84 Stroud District Council has a statutory duty to conserve and enhance the Cotswolds AONB and discharges its functions through supporting the Cotswolds Conservation Board, which consists of 37 members, of whom 15 are nominated by local authorities, eight by parish councils and 14 are appointed by government. The Board is responsible for preparing the Cotswolds AONB Management Plan.
- 5.85 The District Council engages regularly with the Board both at member and officer level, and with adjoining authorities on a variety of strategic policy matters, for example, providing inputs into the national government Glover Review, the production of the latest AONB Management Plan 2018-2033 which sets the vision, ambitions and policies to guide management of the AONB, and by providing commentary on the Landscape Strategy and Guidelines and Position Statements produced by the Board.
- 5.86 During the preparation of the Stroud District Local Plan, the District Council held meetings with the AONB Project Officer and with Natural England to discuss potential site allocations, to commission additional landscape assessment work and to identify the information required for the Board and Natural England to be able to assess the proposals.
- 5.87 The District Council has removed some potential housing allocations and reduced others during the process in response to concerns from the AONB Board and following additional assessment work, at the Regulation 19 stage the AONB Board has withdrawn previous objections relating to two site allocations at Minchinhampton and Painswick. Landscape concerns relating to the identification of 'suitable areas' for renewable energy projects remain, however, the parties are committed to working together to resolve this matter and will continue dialogue accordingly.
- 5.88 The District Council also attends the Cotswolds Ecological Networks Forum meetings to discuss landscape and biodiversity management matters specific to the AONB.
- 5.89 Landscape character matters are an important component in the production of local village design statements. The Council has worked with a variety of Town and Parish Councils in their production, in an advisory capacity, linking our landscape character assessment work, that of the Cotswolds AONB (where relevant) and the landscape sensitivity analysis studies.

### **Health and social infrastructure**

- 5.90 There are clear links emerging between planning for the built and natural environment and the health and wellbeing of our communities. Stroud District Council has worked with the NHS through the Gloucestershire Clinical Commissioning Group and Gloucestershire County Council during the preparation of the Stroud District Local Plan to develop policies which reflect health and wellbeing priorities and then to assess those emerging policies through a Health Impact Assessment which was carried out at Draft Local Plan (2019) stage. The District Council has also met with the Commissioning Group on a number of occasions to identify the health infrastructure requirements arising from the proposed levels of growth and has included specific requirements within the site allocation policies.
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- 5.91 Stroud District Council has also consulted with Gloucestershire County Council to understand the education infrastructure needs associated with growth proposals within the Stroud District Local Plan. The strategic site allocation policies include specific school requirements identified by Gloucestershire County Council.
- 5.92 Stroud District Council is aware that Gloucestershire County Council's approach towards calculating the education needs arising from development was challenged successfully by developers in June 2021 (Appeal Ref: APP/G1630/W/20/3257625 Land off the A38, Coombe Hill, Gloucestershire). Due to uncertainty in this area at the time of preparing the Pre-Submission Local Plan, the District Council's Infrastructure Delivery Plan and Viability Assessment have included a range of potential contribution requirements. Stroud District Council is committed to working with Gloucestershire County Council and developers to attempt to resolve matters during the examination process.
- 5.94 The Gloucestershire local planning authorities and Gloucestershire County Council are currently exploring the potential for developing a single Local Developer Guide for Gloucestershire which will provide a clear practice guide for developers on how the parties expect infrastructure to be funded by development, building upon adopted policies and standards set out in local plans.
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## **6. CONCLUSION**

- 6.1 This report sets out how the District Council has approached the issue of cooperation on strategic planning matters with neighbouring local planning authorities, other prescribed bodies and partners during the preparation of the Stroud District Local Plan.
  - 6.2 It provides evidence that engagement and cooperation with neighbouring local authorities and prescribed bodies has been undertaken throughout the development of the Plan's evidence base, through the consultation processes, into strategy and policy formulation and into the delivery and infrastructure phase.
  - 6.3 The Council has worked closely with neighbouring authorities to discuss and agree policies and proposals to address cross boundary issues and has engaged actively with prescribed bodies to discuss and agree responses to strategic matters.
  - 6.4 The GSoCG provides the framework for greater co-operation on strategic planning matters between the Gloucestershire authorities moving forward and the additional SoCG which have been prepared specifically regarding the Stroud District Local Plan provide evidence on how the strategic matters are being addressed by all parties.
  - 6.5 Whilst there remain outstanding issues, all local planning authorities and prescribed bodies are satisfied that Stroud District Council has met its duty to co-operate during the preparation of the Stroud District Local Plan.
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## Appendices

Gloucestershire Statement of Common Ground (Draft July 2021)

SoCG - Gypsy Traveller and Travelling Showpeople communities (May 2021)

SoCG - Strategic housing matters	(Gloucestershire authorities)	(Draft October 2021)
SoCG – Strategic employment matters	(Gloucestershire authorities, GFirstLEP)	(Draft October 2021)
SoCG - Strategic transport and waste and minerals matters	(Gloucestershire County Council)	October 2021
SoCG – Strategic matters	(South Gloucestershire Council)	October 2021
SoCG – Strategic transport matters	(National Highways)	October 2021
SoCG – Strategic water matters	(Environment Agency)	October 2021
SoCG – Strategic environmental matters	(Natural England)	October 2021
SoCG – Strategic heritage matters	(Historic England)	October 2021

Gloucestershire  
Economic Growth  
Joint Committee

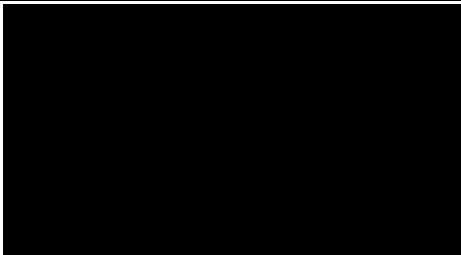
Draft

Gloucestershire  
Statement of Common Ground – July 2021

Cheltenham Borough Council  
Forest of Dean District Council  
Gloucester City Council  
Stroud District Council

Cotswold District Council  
GFirst LEP  
Gloucestershire County Council  
Tewkesbury Borough Council

**Version Control**

Version	Date
Version 1	
Version 2	
Version 3	
Version 4	
Version 5	
Version 6	
Version 7	

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## 1. Introduction

- 1.1. This Gloucestershire Statement of Common Ground (GSoCG) has been prepared by the 7 local authorities in Gloucestershire (x1 County Council and x6 'District' Councils) and GFirst LEP – Gloucestershire's Local Enterprise Partnership – hereafter referred to as the parties.
- 1.2. "Gloucestershire has been a significant location for commerce since around AD48 when the Romans established an important crossing at the River Severn at Glevum. Located at a crossroads between Wales and London, and the West Midlands and the South West, the county's strategic position, even in an increasingly digital age, remains important to this day for businesses, visitors, and residents alike<sup>1</sup>". The county has a diverse and highly valued natural and built environment that makes it a particularly attractive place to live and work.
- 1.3. The County has a strong track record of working together at the strategic level, and has reached agreement on numerous subjects of common interest in recent times including Gloucestershire 2050, the Gloucestershire Local Housing Needs Assessment and the Gloucestershire Inward Investment programme. This GSoCG provides the opportunity to build upon the work that has gone before.
- 1.4. This is the first GSoCG and as such does not contain all the answers. The purpose of this statement is:
  - a. To identify and demonstrate where common ground exists between the parties
  - b. To identify and agree an action plan on the strategic spatial planning matters in Gloucestershire that require collaborative working between the parties.
  - c. To identify in principle the potential response to addressing the strategic spatial planning matters.
  - d. To provide the basis for a 'live' document to allow for regular updates which capture progress against responding to the strategic spatial planning matters, acknowledging that responding to the Climate emergency will be the "Golden thread" that runs through the strategic planning activities and the outputs of this GSoCG.
  - e. To meet (in part) the requirements placed on Local Planning Authorities from the National Planning Policy Framework Revised 2019 (the Framework) to discharge the statutory 'Duty-to-Cooperate' as part of their local plan preparation. The various statutory requirements for a statement of common ground are set out in Appendix 1 for ease of reference.

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<sup>1</sup> Source – Draft Gloucestershire Industrial Strategy 2019

- f. To respond to the Gloucestershire Economic Growth Joint Committee (GEGJC) to develop a statement of common ground as the basis to consider the development of a Gloucestershire Spatial Development Strategy.

1.5. Appendix 2 provides context and explanation to support the agreements outlined in this document.

## **2. Parties involved**

2.1. This GSoCG agrees strategic spatial planning matters between the following parties:

- Cheltenham Borough Council
- Cotswold District Council
- Forest of Dean District Council
- GFirst LEP
- Gloucester City Council
- Gloucestershire County Council
- Stroud District Council
- Tewkesbury Borough Council.

2.2. Any part of the GSoCG that is not agreed by the parties will be identified in Appendix 3, along with the organisation(s) not in agreement. Where text is not agreed by all parties it will be denoted with a dashed border.

2.3. In discharging their continuing joint and individual local plan responsibilities, some of the participating local authorities will need to agree additional or supplementary SoCGs or Duty-to-Cooperate statements with neighbouring local authorities both within and outside Gloucestershire, and with other bodies. Where appropriate, additional or supplementary agreements may be incorporated into the Gloucestershire GSoCG in future iterations, with appropriate explanation, or be presented as separate documents.

2.4. The GSoCG is a strategic document. It deals with matters that require cross-boundary consideration and agreement, and does not address non-strategic issues, which are the concern of and can be addressed by individual organisations, including through their local plans and the local transport plan.

## **3. Signatories**

3.1. The signatories to the GSoCG are the Leaders or Portfolio Holders of the seven local authorities, or the Chief Officers under delegated powers, and the Chair or Chief Executive of GFirst LEP as follows:

Signature and date

Leader or Chief Executive

Cheltenham Borough Council

Signature and date

Leader or Chief Executive

Cotswold District Council

Signature and date

Leader or Chief Executive

Forest of Dean District Council

Signature and date

Chair or Chief Executive

GFirst LEP

Signature and date

Chair or Chief Executive

Gloucester City Council

Signature and date

Leader or Chief Executive

Gloucestershire County Council

Signature and date

Leader or Chief Executive

Stroud District Council

Signature and date

Leader or Chief Executive

Tewkesbury Borough Council.

Other signatories

- 3.2. An appropriate representative of other strategic organisations will be required as a signatory if their organisation becomes a party to the GSoCG.

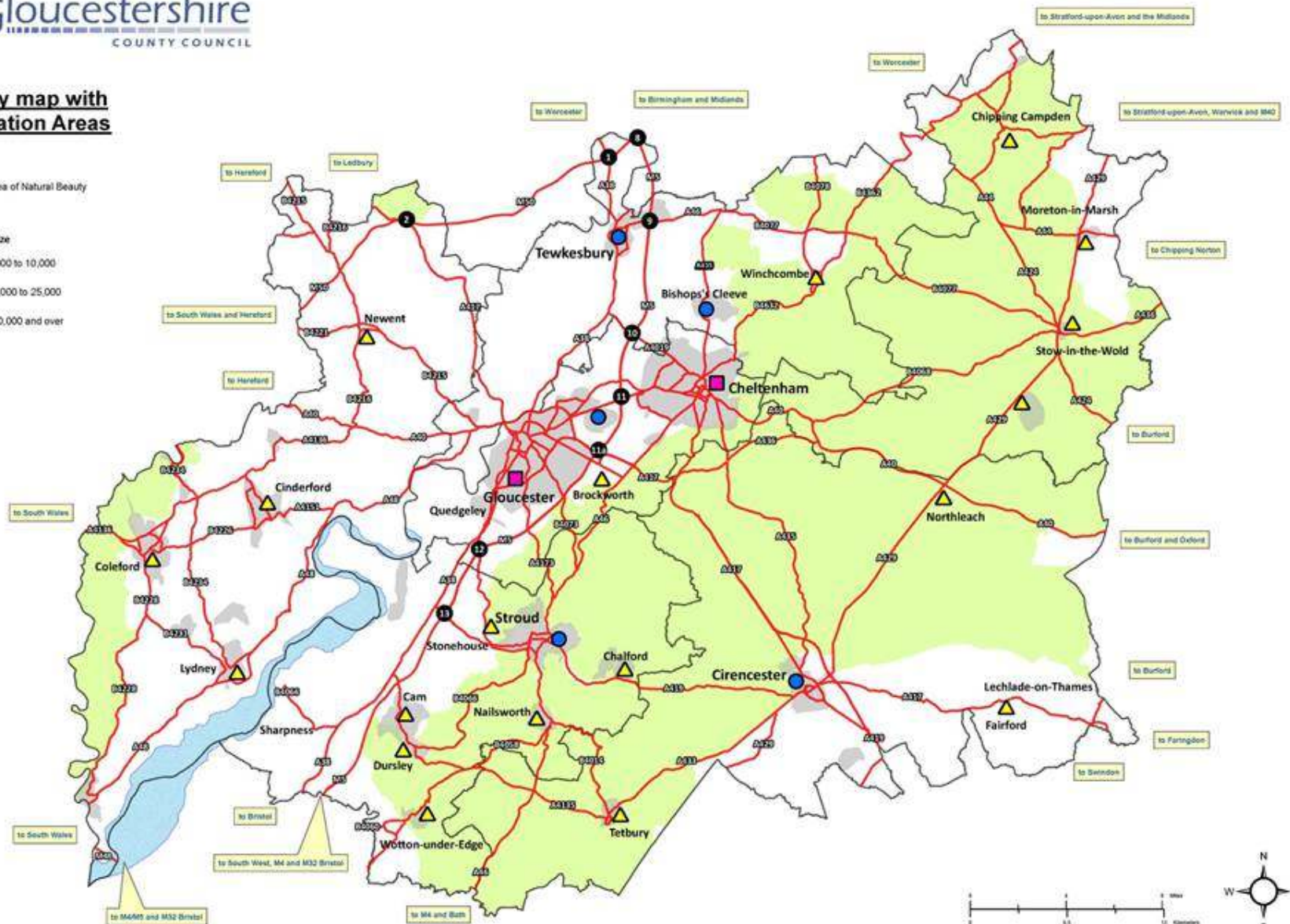
#### **4. Gloucestershire's Strategic Geography**

- 4.1. The GSoCG applies to the County of Gloucestershire. The rationale for developing a GSoCG for this area is the distinctiveness of the area and the relationship between the urban core of Gloucester and Cheltenham and the largely rural areas of Cotswold, Forest of Dean, Stroud and Tewkesbury and the functional and connectivity relationships that are presented. Gloucestershire as a whole is a Functional Housing and Economic Area with a sound economy, though with greater economic potential. This is recognised by the presence of GFirst LEP covering the same area. It also has a Police and Crime Commissioner and a Clinical Commissioning Group, alongside other strategic groups such as the Gloucestershire Nature Partnership and the Gloucestershire Health and Wellbeing Board.



**County map with  
Population Areas**

- Area of Natural Beauty
- Population Size**
- 1,000 to 10,000
- 10,000 to 25,000
- 100,000 and over



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## 5. A Gloucestershire Spatial Development Strategy

### 5.1. The GEGJC have committed to:

“deliver a high-level spatial planning document for Gloucestershire which will set out agreed broad allocations for housing and economic growth across all districts”

and

“the development of, a high level future growth document for Gloucestershire, and work with the Local Plan teams to translate this into an agreed and adopted Gloucestershire Spatial Development Strategy”

5.2. In November 2018, the GEGJC endorsed a proposal to develop a “statement of common ground” as the most effective way of advancing these commitments in the first instance.

5.3. In addressing the matters agreed in this draft GSoCG, action will be taken and a body of evidence will be collected. Drawing that information together and understanding the relationship between the evidence gathered could readily then lead to the production of a Gloucestershire Spatial Development Strategy. The time, resource and financial requirements to support a Spatial Strategy need to be understood before commitment is given. When the aforementioned ‘Action Plan’ is presented to GEGJC, it will be accompanied by a business case for a Spatial Strategy for the County for consideration.

### Agreements

1. The parties agree to the development of a Gloucestershire Spatial Development Strategy and it is recognised that agreeing this statement of common ground provides the most effective way of advancing this commitment in the first instance.

2. The parties agree that an action plan to address the matters and agreements within the GSoCG should be produced. That action plan should build upon the emerging early work undertaken by Gloucestershire County Council and set out the matters to be addressed, the course of action proposed, responsibilities, timetables and budget requirements. That action plan will be presented for consideration by the parties in due course. Once the action plan is agreed work on the Spatial Development Strategy for Gloucestershire will commence.

## 6. Strategic Planning Matter Agreements

6.1. The following presents the agreements reached between the parties on strategic planning matters in Gloucestershire which require a joint response.

### Climate Change

#### Agreements

3. The parties agree that the climate and ecological emergencies presents risks to the county that are systemic, and unprecedented in scale and potential impact.
4. The parties agree that responses to the climate and ecological emergencies must be commensurate with the scale and severity of the risk, and that coordinated action is the most effective means of responding.
5. The parties agree that strategic planning decisions have a role to play in the reduction of carbon in contributing to local and global sustainability, and that our decisions must be informed by the climate and ecological emergencies and wherever possible deliver a positive contribution to climate change mitigation and adaptation and ecological recovery. Responding to the Climate Emergency will be the 'golden thread' that runs through the strategic planning activities and the outputs of this SoCG, responding to our commitments to Carbon net zero.
6. The parties agree to investigate the use of alternative forms of energy generation, in line with environmental and landscape considerations.

## Housing

### Agreements

7. The Parties agree that making provision to meet the full range of housing needs in the right places at the right time is a vital role for the Gloucestershire authorities. The parties acknowledge this may result in one local authority accommodating the identified needs of another local authority, particularly where a local authority is unable to accommodate all of the identified need and where accommodating need in a neighbouring authority represents the most sustainable form of development.
8. The parties agree to jointly seek to meet in full (at least) the aggregated housing needs for Gloucestershire as identified by the statutory standard method at the time. The parties will continue the joint approach to the collection of housing needs data through a jointly procured and managed Local Housing Needs Assessment, using the relevant housing need methodology of the day. The parties agree to deliver housing where it promotes sustainable patterns of growth in Gloucestershire and is designed to respect local character and address potential impacts on existing communities.
9. The parties agree to explore the full range of development opportunities available, taking into account the potential impact on existing communities, resources and infrastructure.

## The Economy and Employment

### Agreements

10. The Parties agree it is important to take advantage of the location and characteristics of Gloucestershire and its economic strengths. The parties will take a pro-active role in creating the conditions within which existing and potential new employers can flourish, with a particular emphasis on spatial planning. Action will be taken to identify the

appropriate scale and distribution of employment allocations, with the potential value of strategic sites to serve a larger area fully considered.

11. Parties agree that collaboration is essential to deliver a purposeful Gloucestershire approach to inward investment and business retention.

## The Green Belt

### Agreements

12. The Parties agree that the Green Belt in Gloucestershire is a strategic issue to be considered in the context of strategic spatial planning for the County.
13. The Parties agree that changes to the Green Belt boundary will be considered through the local plan making process, particularly through the JCS Review, in order to provide more sustainable locations for development that support the overall spatial strategy.

## Transport Provision

### Agreements

14. The Parties agree that strategic land allocations will set out the appropriate transport infrastructure required to deliver sustainable, resilient communities. This will be achieved through implementing the policies of the Gloucestershire Local Transport Plan, which provides for better public transport, cycle and pedestrian infrastructure, and active travel to enable a more efficient, low-carbon and people-centred transport network that delivers genuine travel choice and contributes to the growth of Gloucestershire's economy. Each strategic allocation that comes forward through the development plan will be supported by a sustainable transport mitigation package, based on the policies set out in the Gloucestershire Local Transport Plan.
15. The Parties agree to continue the exploration and pursuit of the opportunities to enhance the passenger transport network and services, as an integral part of developing a potential integrated spatial strategy and with the objective of increasing the proportion of trips within and beyond Gloucestershire made by rail.
16. The Parties agree that local plans should contain policies to ensure new developments support, where possible, the viability of passenger transport network and services. This is in recognition of the role of passenger transport in improving all people's accessibility and to reducing the carbon emissions associated with transport.
17. All parties agree that opportunities to maximise sustainable transport solutions will vary between urban and rural areas.
18. The Parties agree that local plans should contain policies requiring developments to contribute the provision of the walking and cycling network. This is in recognition of the role active travel will play in achieving carbon reducing ambitions and promoting a healthy and active society. The aspiration is for cycling to become mass transit and routes

must be designed for larger numbers of cyclists, of all abilities and disabilities. Cycling and walking should be at the heart of transport, place-making, and health policy.

## Digital Network

### Agreements

19. The Parties will seek every opportunity to promote the advancement and rollout of digital infrastructure. The goal will be to achieve high quality digital services and modern economic and social infrastructure for Gloucestershire so that the County can continue to compete regionally, nationally and globally in the attraction of people and businesses. There will be a particular focus on delivering cyber technologies and digital infrastructure across the entire County, noting that substantial parts of Gloucestershire are rural areas.
20. The Parties will work with industry to identify the best means of contributing through planning policy and highways work to the timely delivery of comprehensive, open access, digital infrastructure.

## Natural Environment and Green Infrastructure

### Agreements

21. The Parties will ensure that strategically and locally important green infrastructure and ecosystem services are valued and improved through the development of a Natural Capital approach and the Nature Recovery Network, both being led by the Gloucestershire Local Nature Partnership (GLNP).
22. The Parties agree that local plans should contain policies requiring developments to deliver high quality and appropriately managed green infrastructure, to comply with and, where feasible, be assessed against the Building with Nature Standards, and to deliver a net gain for biodiversity.
23. In developing the Natural Capital approach, consideration will continue to be given to the desirability and feasibility of creating a regional park, possibly around the River Severn and its washlands, with objectives including raising awareness of the natural environment, habitat enhancement, recreation, strategic water management, carbon capture, and the creation of a Gloucestershire brand.
24. The Parties agree to work collaboratively to help conserve, manage and enhance the area's unique natural environment including areas of international and national landscape and biodiversity importance.
25. The Parties agree to work collaboratively and holistically to develop a Gloucestershire wide approach to mitigate against flood risk and to build in resilience through nature-based solutions. The role played by green infrastructure in reducing the risk of flooding should be considered at every scale stage in determining sustainable strategic land allocations for housing and employment. Parties agree to ensure adequate consideration

is given to the cumulative and off-site impacts of development on future flood risk. The promotion of new water retention technologies will be encouraged, including sponge technology techniques.

## Health and Social Infrastructure

### Agreements

26. Parties will ensure that provision for strategic health, wellbeing, cultural and education facilities, consistent with the changing size and structure of the population, is made in the appropriate locations through spatial strategy. This will include the raising of standards and inclusive access across these facilities.
27. The Parties are committed to the elimination of discrimination and promotion of equality of opportunity for all citizens and will work towards this goal, both in the provision of services and employment.

## Infrastructure Delivery

### Agreements

28. The Parties agree that the strategic infrastructure needs\* for the County, particularly those that align to future strategic growth, will be identified, prioritised and agreed on, and captured in one single source document. A methodology for prioritisation will be agreed in advance of the prioritisation taking place.
29. The infrastructure agreed upon will be costed and scheduled. The likely funding streams and mechanisms to enable the delivery of infrastructure will be identified. Joint working and engagement across parties will be used to develop business cases for funding and competitive bidding.
30. The Parties agree, through appropriate governance arrangements, that the task identified at agreements 22 and 23 should be undertaken strategically with involvement of the parties and others where relevant.

*\* Strategic Infrastructure Needs - refers to a broad range of infrastructure required to support future growth, included but not limited to social, cultural, educational, green infrastructure as well as more 'traditional' infrastructure associated with new development (e.g. roading infrastructure).*

## Minerals and Waste

### Agreements

31. The Parties agree to identify valuable minerals resources to be safeguarded for possible exploitation, and agree to seek the best way forward and its implementation through local plans, including by the exploitation of minerals in association with development in accordance with the spatial strategy.

32. The Parties will support the form and location of appropriate waste management facilities to positively support a progressive approach to waste management and press on with the move towards a circular economy. The Parties will actively discourage waste management facilities that do not contribute to the development of the circular economy.
33. The Parties will continue and extend the work started in parts of the Gloucestershire the identification of opportunities for the generation of energy from renewable and benign resources and will seek positive and progressive policies in local plans for the exploitation of these opportunities.
34. The Parties will seek to produce a reduction in the level of energy use, and this will be sought in part by the requirement for the incorporation of the most appropriate advanced technologies for energy generation from renewable sources and for energy conservation as part of significant new development schemes.

## **7. Governance**

7.1. In order for this GSoCG to be advanced and the agreements identified above delivered, clear governance is required. The GEGJC is an established committee, and is the committee that jointly commissioned this GSoCG. The following governance arrangements are proposed:

- The GEGJC will continue to be the committee responsible for the overall production, development and monitoring of the GSoCG.
- The Senior Responsible Officer for the GSoCG will be XXX. They are charged with XXX
- The Strategic Planning Leaders Board will continue to provide strategic oversight and management of the GSoCG, the GSoCG Action Plan and any other future initiatives arising from the GSoCG.
- The Heads of Planning/Planning Policy Managers in district authorities, the Outcome Manager from GCC and the Deputy CEO from GFirst LEP will take responsibility for the production and updating of any further initiatives arising from the GSoCG

### **Agreements**

35. The parties agree that the Gloucestershire Economic Growth Joint Committee will be the committee responsible for the production and monitoring of the GSoCG.
36. The parties agree that whilst the essential purpose of the GSoCG is to promote joint action in addressing strategic issues, nothing in the GSoCG removes the roles and responsibilities of the individual participating organisations in making decisions according to their statutory roles.

## **8. Next Steps**

- 8.1. Reaching agreement on strategic planning matters is the start of the GSoCG. Action needs to be taken to address the matters arising from those agreements. It is proposed that an action plan be developed to identify the actions to be taken, those responsible for taking that action, and a timeframe and budget to address the actions. This will be presented to GEGJC within 6 months of this GSoCG being approved by GEGJC. (See Appendix 4 for template)
- 8.2. The actions will address some of the evidence needs arising from Local Plan preparation across the 7 authorities. Once the action plan is agreed work on the Spatial Development Strategy for Gloucestershire will commence..
- 8.3. The GSoCG is a live document and needs to be kept up-to-date. This should be done annually and/or when progress is made to address the matters or agreement and/or when the landscape changes (for example planning reform or local government reorganisation). Progress also needs to be monitored, which again should be done annually and reported through a monitoring report.

### **Agreements**

37. The parties agree that the GSoCG is a live document, to be updated and monitored regularly, and as a minimum on an annual basis.



## **Appendices**

1. The Requirements of a Statement of Common Ground
2. Background Information to Support the Gloucestershire Statement of Common Ground
3. List of 'Agreements' not agreed by any and/or all parties
4. Action Plan to deliver on commitments in the Gloucestershire Statement of Common Ground

## **Appendix 1 - The Requirements of a Statement of Common Ground**

MHCLG – Guidance on Plan Making (<https://www.gov.uk/guidance/plan-making>)

### **What is a statement of common ground expected to contain?**

A Statement of Common Ground is expected to contain the following:

- a. a short written description and map showing the location and administrative areas covered by the statement, and a brief justification for these area(s);
- b. the key strategic matters being addressed by the statement, for example meeting the housing need for the area, air quality etc.;
- c. the plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories (including cross-referencing the matters to which each is a signatory);
- d. governance arrangements for the cooperation process, including how the statement will be maintained and kept up to date;
- e. if applicable, the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement;
- f. distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area;
- g. a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and
- h. any additional strategic matters to be addressed by the statement which have not already been addressed, including a brief description how the statement relates to any other statement of common ground covering all or part of the same area.

The level of cooperation detailed in the statement is expected to be proportionate to the matters being addressed. The statement is expected to be concise and is not intended to document every occasion that strategic policy-making authorities meet, consult with each other, or for example, contact prescribed bodies under the duty to cooperate. The statement is a means of detailing key information, providing clear signposting or links to available evidence on authorities' websites.

## **Appendix 2 - Background Information to Support the Gloucestershire Statement of Common Ground**

### **1. Gloucestershire's Strategic Geography**

- 1.1. Gloucestershire lies between other complementary and competing areas, with Bristol and the West of England Combined Area to the south, Oxfordshire to the east; Swindon to the South East; Birmingham, Coventry and Warwickshire to the north; and Worcestershire and Wales to the west and north-west. Gloucestershire is part of the Western Gateway launched in November 2019, as a strategic partnership intended to promote and maximise economic growth across the west of England and south Wales. The Western Gateway will seek to ensure that the region is globally competitive and as such is intended to mirror and compete with the already established Northern Powerhouse and Midlands Engine. Gloucestershire is actively involved in the progression of the Western Gateway and Gloucestershire has a significant role to play, in particular through the progression of cyber as a key sector and lever for growth in this part of the region. As well as cyber-tech the draft Local Industrial Strategy highlights agri-tech, aerospace and manufacturing services sectors as key strengths for the county.
- 1.2. There are a number of strategies dealing with social, economic and environmental issues for Gloucestershire and others in preparation. These are examples of collective working on strategic issues, and participants in the GSoCG are either party to these strategies or will continue to seek to work with the owners of these strategies and to cooperate in their implementation. Current and emerging strategies include Gloucestershire 2050, the Local Industrial Strategy, the Local Transport Plan, the Sustainable Energy Strategy, the Green Infrastructure Strategy and the emerging climate change strategy for Gloucestershire. What is clearly evident from this strategic context is the alignment of priorities that that will need to be considered in developing the GSoCG.
- 1.3. Currently, Local Plans and the Local Transport Plan are the primary, statutory mechanism used to plan and deliver development in Gloucestershire. These plans, when considered holistically, provide a 'spatial plan' for Gloucestershire up to the mid 2030's, broadly as follows:
  - The Urban Areas of Cheltenham and Gloucester, adjacent areas within Tewkesbury Borough, as well as Ashchurch are the focus of strategic growth
  - Stroud caters for significant growth, commensurate with its size and geographical location
  - Tewkesbury and Winchcombe together with the larger villages of Tewkesbury Borough, the Forest of Dean towns of Coleford, Lydney, Newent and Cinderford, and the larger Cotswold towns of Cirencester, Moreton-in-Marsh and Tetbury cater for reasonable levels of development, commensurate with their size.
  - Smaller urban areas (including villages) across Gloucestershire provide for local need
  - Rural areas are largely protected from development
  - Investment in transport infrastructure largely aims to cater for growth at the levels identified above and remedy other existing, identified problems.

Spatial planning in Gloucestershire has been approached in this hierarchical way for some considerable time. With the important additional consideration of potential new settlements, such a development approach means that homes are built close to the largest areas of employment opportunities, infrastructure investment can be target toward major populations (enhancing its use, effectiveness and success) whilst other areas can accommodate local demand whilst protecting character, both built and natural. The current status of Local Plans across Gloucestershire is set out at Appendix 2.

## **2. Current Context (September 2020)**

2.1. There are a number of recent events that will inevitably impact on spatial planning in Gloucestershire (and indeed the broader country). They are outlined below because they will have a significant bearing on the way in which this GSoCG and any Gloucestershire wide spatial planning is taken forward. These include:

- All local authority parties have declared a Climate Change emergency (with some also declaring a specific ecological emergency) with varying aims and targets within the last 12-18 months, all with a theme of reducing carbon emissions. If this is to be achieved the location and connectedness of, and the design standards adopted in new development need careful consideration and a joined up approach.
- Covid 19 and it's impacts – It is inevitable that there will be negative short-medium term economic consequences. There may well be lasting societal changes that emerge too – including a reduced demand for travel, a greater appreciation and utilisation of people's homes and local areas (in particular open, green spaces), an accelerated need to change the function of urban centres, a need for enhanced digital connectivity and so on, a decentralisation from larger urban centres such as London and Birmingham as remote technology and ability to work from homes shifts perceptions in where people wish their homes to be located.
- The Government's Planning White Paper of Summer 2020 proposes wholesale reform of the planning system in England. There are a wide range of changes proposed which if implemented will have a significant impact on Plan making and infrastructure delivery across England.
- The Government may consult on further devolution proposals during 2021. The opportunity to plan jointly (for example the JCS) already exists, but changes to local government structures in the future may provide new opportunities.

2.2. Taken as a whole, these recent events, the outcomes of which are unknown, will have a profound effect on plan making and delivery of growth in the future. This must be borne in mind in progressing with this GSoCG and any recommendations arising. A live 'GSoCG' should enable timely responses to the challenges we face. At the same time, investment in strategic planning, including future work on this GSoCG and any subsequent planning strategy work, needs to be carefully considered in the context of planning reform and local government review.

### **3. Strategic Planning Matters in Gloucestershire**

#### **Introduction**

- 3.1. The GSoCG is about strategic planning matters that can be addressed by spatial planning and need to be addressed by more than one district planning authority, whilst working with the County Council and GFirst LEP. What follows is an identification of the strategic matters in Gloucestershire, with a set of agreements which capture the matters arising and the proposed responses (as actions). They are presented as distinct matters of spatial planning but need to be considered as component parts of successful spatial planning.

#### **Climate Change (and Ecological Emergency)**

- 3.2. There is an overwhelming need in Gloucestershire, as everywhere, to address the climate and ecological emergency, as declared by each of the local authorities in Gloucestershire. The strategic planning activities in the Gloucestershire must work towards this commitment and to achieving a net carbon zero society. There are opportunities through growth to advance carbon reduction technologies in Gloucestershire, including through commitments to sustainable construction and better building energy performance. The level of use of energy by residents, workers and visitors is higher in Gloucestershire, as everywhere, than is consistent with a low carbon future. More needs to be done to generate energy locally from renewable sources using a variety of technologies and to reduce the consumption of energy generally.
- 3.3. Gloucestershire's existing transport network depends largely on its highway network. Future transportation solutions in Gloucestershire need to balance demand for clean sustainable growth and improved connectivity with maximising the efficiency of existing infrastructure. Significant investment in Gloucestershire's passenger and active travel networks will be required to complement planned highway capacity works as future growth will require greater integration of modes to ensure a high quality transport network is deliverable.
- 3.4. The legacy of COVID-19 and the possible changes towards travel demand is likely to challenge the traditional view of managing the transport network, with the priority of minimising journey times switching to managing journey options for people as transport networks decarbonise. Serving a growing leisure market may also become as important as commuting options when people decide where to live and this may need to be considered as the county grows.

#### **Housing**

- 3.5. The housing needs of Gloucestershire have to be met to enable the members of the changing population to house themselves, including those who need assistance through the provision of affordable housing, to address the need to attract a younger working age population and to ensure a workforce exists locally to enable the achievable growth in the economy to take place. The housing that is built needs to be fit for purpose and enable people to live

independently in their own home for as long as they can. This will require a flexible response to the type and tenure of housing together with the sustainability principles of the product.

- 3.6. Each local authority is required to make provision to meet the housing needs of its area through Local Plans. How and where that provision is made clearly affects those in need of housing, and has implications for the economy, transport and the environment. It is important that the right type of housing is development in the right places to meet needs, enhance wellbeing, support the economy and protect the environment. The future form of housing development in Gloucestershire, whether this be through extensions to existing settlements or through new settlements, should promote sustainable patterns of living and be designed to respect local character.
- 3.7. The housing requirements are increasingly unlikely to be met wholly within the same local administrative area as the need arises, particularly where those areas are geographically/administratively constrained (e.g. Cheltenham and Gloucester). Where this arises, planning policy requires those authorities to seek provision in neighbouring authority areas, and if this cannot be achieved reach a conclusion that the need cannot be met. Failing to meet housing need impacts on Gloucestershire’s growth ambitions, housing affordability and choice, reduces the available workforce in an area and encourages travel between people’s homes and jobs particularly (in Gloucestershire case) by private car and can make the provision of services less efficient to deliver.
- 3.8. Current local plans/local plans in development in Gloucestershire make provision for new homes to varying timescales. This provisions is captured below:

<b>Area</b>	<b>Plan Status and key dates</b>	<b>Plan Period</b>	<b>Requirement</b>	<b>How is this Met?</b>
<b>Cheltenham</b>	Joint Core Strategy adopted 2017  Cheltenham Plan adopted 2020	2011-2031	at least 10,917 new homes	Completions, commitments, Plan allocations and windfall allowance
<b>Cotswold</b>	Adopted 2018	2011-2031	420 pa	Allocation and windfall supply
<b>Forest of Dean</b>	Allocations Plan adopted June 2018 Replacement Local Plan at early strategic options stage (2021-41)	2006-2026	330 pa	Allocation and windfall
<b>Gloucester</b>	Adopted Joint Core Strategy	2011-2031	at least 14,359 new homes	Completions, commitments,

	Emerging Gloucester City Plan (at Examination)			Plan allocations and windfall allowance
<b>Stroud</b>	Local Plan adopted November 2015	2006-2031	At least 11,400 new homes	Completions, commitments, Plan allocations and windfall allowance
<b>Tewkesbury</b>	Adopted Joint Core Strategy  Emerging Tewkesbury Borough Plan (at Examination)	2011-2031	9,900	Completions, commitments and proposed allocations in emerging Borough Plan total 9,397 dwellings  Shortfall (503 dwellings) to be addressed through JCS review

3.9. Local Plans in the area also contain specific policies for Gypsy and Traveller provision, as below:

<b>Area</b>	<b>Plan Status and key dates</b>	<b>Plan Period</b>	<b>Requirement</b>	<b>How is this Met?</b>
<b>Cheltenham</b>	Joint Core Strategy adopted 2017  Cheltenham Plan adopted 2020	2011-2031	3 pitches	Criteria based policy
<b>Cotswold</b>	Adopted Local Plan (2018)	2011-2031	3 pitches	2 allocated sites + criteria based policy for additional allocations
<b>Forest of Dean</b>	Allocations Plan 2018/ Core Strategy 2012	2006-2026	No requirement identified at time of examination	Criteria based policy

<b>Gloucester</b>	Adopted Joint Core Strategy  Emerging Gloucester City Plan (at Examination)	2011-2031	2 pitches	
<b>Stroud</b>	Local Plan adopted November 2015	2006-2031	31 pitches	Completions and commitments
<b>Tewkesbury</b>	Adopted Joint Core Strategy  Emerging Tewkesbury Borough Plan (at Examination)	2011-2031	17 pitches <sup>2</sup>	Completions and proposed Borough Plan allocations total: 50 pitches

3.10. Local Plans in the area also contain specific policies for Travelling Showpeople provision, as below:

<b>Area</b>	<b>Plan Status and key dates</b>	<b>Plan Period</b>	<b>Need</b>	<b>How is this Met?</b>
<b>Cheltenham</b>	Joint Core Strategy adopted 2017  Cheltenham Plan adopted 2020	2011-2031	None	N/A
<b>Cotswold</b>	Adopted Local Plan (2018)	2011-2031	None	Criteria based policy
<b>Forest of Dean</b>	Allocations Plan 2018/ Core Strategy 2012	2006-2026		Criteria based policy
<b>Gloucester</b>	Adopted Joint Core Strategy  Emerging Gloucester City Plan (at Examination)	2011-2031	16 plots	

<sup>2</sup> 17 pitches includes 5 pitches from those who meet the definition of traveler from the Planning Policy for Traveller Sites plus 25% (12 pitches) of those where it was at the time unknown whether they would meet the definition or not.



<b>Stroud</b>	Local Plan adopted November 2015	2006-2031	8 plots	Completions and commitments
<b>Tewkesbury</b>	Adopted Joint Core Strategy  Emerging Tewkesbury Borough Plan (at Examination)	2011-2031	22 plots	Proposed Borough Plan allocations total: 9 plots

3.11. There are good reasons for the parties to agree that housing provision is a strategic spatial planning issue, and that joint working to make sufficient provision is essential. Work is already underway to address this issue jointly. District authorities in Gloucestershire are currently working on a Local Housing Needs Assessment which identifies the minimum housing need for Gloucestershire broken down to a District level and sub categories of need, including affordable housing and housing for special needs.

3.12. Proposed reforms to the current planning system will change the methodology used to calculate housing need. The initial indication is that the 20yr need will rise from 65,000 under the current method to 95,000 under the new method. To meet these identified needs a range of development options will need to be considered and joint working will be essential.

### **The Economy and Employment**

3.13. Whilst the economy of Gloucestershire is strong, there is greater economic potential to be achieved, with some sectors showing particular strength and with Gloucestershire home to some distinctive businesses activities that can be nurtured to the benefit of the local and wider economy. All prospective employers will in part be assisted through the provision of employment land and space where it is needed and of a scale and type suitable for the requirements of the relevant sectors, with particular regard to where Gloucestershire may have a particular advantage over other possibly competing areas. Flexibility will be key and this will need to be built through engagement across the key sectors. GFirst LEP will be a key contributor to providing the evidence base to help steer the changing economic context for Gloucestershire.

3.14. Gloucestershire has an ageing population with a falling level of economically active people, a change taking place because the retention of young people in the area is relatively low. This will give rise to increasing inter-generational tensions and has direct and indirect negative effects on the economy.

3.15. In Gloucestershire critical roles in creating the conditions for businesses to thrive include:

- The district councils, charged with providing for employment space through the allocation of land in local plans, and with ensuring enough housing is provided

- The County Council responsible for transport infrastructure, economic development and education
- GFirst LEP with very strong links with businesses and providing direct support to new, incoming and existing businesses, as well as producing the Local Industrial Strategy
- All local authorities with various responsibilities for green and inclusive growth

3.16. Whilst these organisations work together, there isn't yet one coherent strategy for coordinated action to support the development of employment and the economy in the future. GFirst LEP have prepared the Local Industrial Strategy for Gloucestershire which was put to Government prior to the onset of Covid-19. The views of the Government are awaited. Local Plans provide for employment land across Gloucestershire, currently as follows:

<b>Area</b>	<b>Plan Status and key dates</b>	<b>Plan Period</b>	<b>Requirement</b>	<b>How is this Met?</b>
<b>Cheltenham</b>	Joint Core Strategy adopted 2017  Cheltenham Plan adopted 2020	2011-2031	192ha B Class – across the JCS area	Completions, commitments, Plan allocations and windfall allowance
<b>Cotswold</b>	Adopted Local Plan (2018)	2011-2031	24ha B Class land between 2016-2031	Completions, commitments and plan allocations
<b>Forest of Dean</b>	Allocations Plan 2018	2006-2026	Not stated	New allocations and intensification of existing sites, criteria based policies (60+ha)
<b>Gloucester</b>	Adopted Joint Core Strategy  Emerging Gloucester City Plan (at Examination)	2011-2031	192ha B Class – across the JCS area	Completions, commitments, Plan allocations and windfall allowance
<b>Stroud</b>	Local Plan adopted November 2015	2006-2031	58 hectares	Completions, commitments, Plan allocations and windfall allowance

<b>Tewkesbury</b>	Adopted Joint Core Strategy  Emerging Tewkesbury Borough Plan (at Examination)	2011-2031	192ha B Class – across the JCS area	84ha on strategic allocations (some or all within Tewkesbury Borough)  40ha on proposed allocations in the emerging Tewkesbury Borough Plan  Other commitments and vacant employment land across the Borough.
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3.17. The parties have recently completed a new Gloucestershire Economic Needs Assessment (2020) which:

- Identifies the Functional Economic Market Area (FEMA) for planning purposes.
- Provides a review of the context in neighbouring areas and the wider region.
- Provides an assessment of the economic performance and characteristics and commercial property market.
- Considers a range of scenarios for future economic growth in Gloucestershire.
- Identifies the quantum of employment land required to meet these scenarios and the locational requirements of different sectors.

This work has been commissioned to directly inform the preparation of Local Plans across Gloucestershire.

### **The Green Belt**

3.18. Parts of Gloucestershire are designated as Green Belt, a designation dating from the Gloucestershire Development Plan of 1968 and extended by the Gloucestershire County Structure Plan in 1981. The fundamental intention the Green Belt is to prevent urban sprawl by keeping land permanently 'open'. Parts of Gloucestershire that offer good potential for promoting more sustainable development are in the green belt and so local plans – prepared with the overriding statutory objective on plan-makers of promoting sustainable development

- will have to consider whether changes to the area of green belt will have to be made, as national planning policy provides for.

- 3.19. Green Belt policy was originally conceived as a strategic policy for shaping the pattern of development – and it was identified through strategic planning documents when designated. It should be looked at strategically therefore, and this is a role for the GSoCG. If avoiding development in the Green Belt means that the development will have to go elsewhere, then the alternative locations must still need to contribute toward the overall spatial strategy and sustainable development objectives. For plans to withstand scrutiny the reasons for rejecting alternatives must be clearly given.

### **The Movement of People, Goods, Services and Information**

- 3.20. There is a clear need to provide for greater modal choice to provide for alternatives to the car and enable individuals to choose how they travel. Post COVID-19 there will be a need to work collectively to develop a financially sustainable transport offer that reflects the possible legacy of the pandemic on changes in demand to traditional journey patterns. Improvements in digital connectivity open opportunities for this and help support the management of the transport network.
- 3.21. As the county grows there is a clear need to increase the market share of rail through better regional connectivity and work with bus operators to identify sustainable solutions to develop a financially sustainable, socially inclusive and efficient countywide bus network. This will provide for areas not served by rail. It will also aid understanding of the decarbonisation transfer process the roles different parties will need to play supporting this. Cycling and Waling also provide a real opportunity to improve the physical and mental health of residents, improve air quality and ease congestion within urban areas.
- 3.22. In addition to supporting personal travel it is important to recognise the requirements of commercial operators to provide the most efficient way of transporting goods alongside reducing carbon emissions and improving air quality.
- 3.23. The movement of people, goods and services between and within places and spaces has a profound effect on the economy, the lives of residents and the environment. There is a clear relationship between the location, scale and form of growth and movement. This GSoCG provides the opportunity to maximise the opportunity to promote and enable shifts in movement behaviour through considering the location of existing and new populations and aligning movement solutions to enable the greatest impact and success.

### **Transport Provision**

- 3.24. Essential travel in Gloucestershire is heavily based on the private car. For the most part this is currently fossil fuel propulsion, but this will change dramatically in the plan making periods relevant to the GSoCG, as car technology is changing quickly, with electric and other forms of non-carbon emitting propulsion taking over, with manufacturers committing to phasing out fossil fuelled propulsion. The provision of publicly accessible electric charging is an important

commitment by the County Council and district authorities which will facilitate and speed this change to the car as a sustainable mode of transport. However, even with the uptake of electric vehicles proceeding as planned, Government and local carbon reduction targets can only be achieved if we also create communities that reduce the need to travel and through a significant shift to sustainable transport modes, such as walking, cycling and public transport. The GSoCG will need to take account of this fundamental change in outlook in considering sustainable locations for strategic land allocations for the future.

- 3.25. The housing and employment land strategic site selection purpose of the GSoCG provides a golden opportunity to enable much improved public transport connections for residents, both road and rail, to create the genuine choice for residents outlined in paragraph 3.21, and deliver the public transport aspirations of the Local Transport Plan.
- 3.26. Covid-19 has led to a significant increase in online retail and remote working. Clearly this has negative consequences on existing town centres, but the need to travel for retail purposes are diminishing. New technologies and initiatives are ever developing which may lead to a shift the way in which people, goods and services move, ranging from Electronic Vehicles and Autonomous Vehicles to Mobility as a Service (MaaS). The location, design and layout of new development need to take into account of these developments. Digital technology provides an alternative to movement, and this is covered in more detail below.
- 3.27. The Gloucestershire Local Transport Plan (LTP) sets out the current transport strategy for Gloucestershire to 2041. The plan provides for a range transport schemes which largely aim to cater for planned growth and seeks to promote modal shift in new developments.
- 3.28. Development beyond that identified in existing advanced or adopted local plans provides the greatest opportunity to influence future movement choices. The road and rail network, together with technological advances provides the opportunity for modal shift but investment will be required. The LTP sets out a range of aspirations and scenarios for catering for growth that could take place beyond 2031. These aspirations and scenarios need to be developed alongside decisions on the future locations of growth to make them effective and successful.

### **Digital Network**

- 3.29. Gloucestershire already has a strategic role in cyber security and this will grow significantly with the development of 'Cyber Central'. The County must position itself to take full advantage of this opportunity, from education to supporting industries to broader connectivity benefits for the community at large.
- 3.30. The movement of information digitally is becoming ever more relevant, and Covid-19 has proved the value of and need for quality connectivity, particularly for the service sector on which a large proportion of the Gloucestershire economy relies. Quality broadband services are increasingly a factor people consider when looking at the attractiveness of an area as somewhere to live. Gloucestershire has the opportunity to benefit from the comprehensive and inclusive roll out of high quality digital infrastructure to assist business and domestic users.

## **Natural Environment and Green and Blue Infrastructure**

- 3.31. Gloucestershire contains areas of great landscape value, some recognised by national designations and of huge value to residents and visitors alike, and these need to be conserved and enhanced for their own sake and for the distinctive character they give to Gloucestershire. At the same time, more people need ready access to environmental assets as has been highlighted during the Covid-19 pandemic, and there is 'quality in the ordinary'. An enhanced green infrastructure network of spaces and corridors would provide structure and identity to an area, benefit wildlife, create recreational opportunities and amenity, help in the management of water, and assist in carbon capture.
- 3.32. Green infrastructure as a connected network of multi-functional green and blue spaces and corridors is essential to the wellbeing of Gloucestershire and its people, and is something should be part of the spatial strategy and as such promoted through the GSoCG. Part of the appeal of Gloucestershire for residents and business alike is its natural environment.
- 3.33. There is a great deal of work underway in Gloucestershire by government agencies, local authorities and voluntary groups promoting various aspects of green infrastructure. This includes:
- The work promoted by the Gloucestershire Local Nature Partnership (GLNP) on natural capital baseline mapping and on the Nature Recovery Network that helps to underpin it.
  - The national Building with Nature Standards, developed in Gloucestershire (initiated by the GLNP and the Gloucestershire Wildlife Trust), provide planners and developers with evidence-based, how-to guidance on delivering high-quality green infrastructure
  - The emerging Environment Bill will mandate Biodiversity net gain for certain types of development, noting the National Planning Policy Framework (NPPF) already highlights the need to provide biodiversity net gain.
- 3.34. In 2015, the Green Infrastructure Working Group of the GLNP developed 'A Strategic Framework for Green Infrastructure in Gloucestershire' with consultation and agreement gained from Gloucestershire's local authorities (undergoing review in 2020-21).
- 3.35. Gloucestershire Vision 2050 identified the potential of a Regional Park. Stakeholders have been investigating the possibility, including identifying a possible location.
- 3.36. Furthermore, all authorities signed up to the GLNP Green Infrastructure Pledge in 2018 - a promise to commit to making Gloucestershire a pioneer of green infrastructure, creating a better, more attractive place to live, work and visit, as well as becoming an exemplar for the rest of the country.
- 3.37. Many of the local authorities in Gloucestershire have recognised the huge declines in biodiversity by declaring climate and ecological emergencies. Many policies and initiatives are

in place or are being developed around biodiversity and nature recovery showing a commitment to continuing to work in partnership to address biodiversity declines.

- 3.38. There is therefore a great deal to use and to build upon for improved and better valued green infrastructure, expressed through strategy/policy, as part of the spatial strategy embraced by the GSoCG.
- 3.39. Flood resilience will require a strategic response, including others beyond the boundary of Gloucestershire. Having a clear and agreed proposed flood resilience response will enable the Parties to engage with neighbouring authorities and regions in a coordinated way.

### **Energy Production**

- 3.40. There is a need to increase energy efficiency and reduce energy usage for residents, workers and visitors in Gloucestershire in order to achieve a net-zero carbon future. There are key opportunities to achieve this through commitments to more sustainable construction methods with improved building energy performance, as well as through shifts in transport modes. There is also opportunity to explore renewable and low-carbon energy generation projects, including community energy schemes.
- 3.41. The Gloucestershire Sustainable Energy Strategy (2019) includes 6 key ambitions for energy reduction in Gloucestershire and a road map of actions to establish the building blocks necessary, focusing on the next 6 years.

### **Health and Social Infrastructure**

- 3.42. Many of the matters above have a clear impact on health and wellbeing – to provision of quality green space and housing, providing opportunities for active travel, reducing emissions and improving air quality and so on. The relationship between spatial planning is not traditionally fully understood, but that relationship is becoming clearer.
- 3.43. Specifically here, early year, educational, health and cultural facilities including open space, need to be provided at least in balance with the needs of a growing and changing population, consistent with nurturing greater skills and wellbeing, and more inclusively. Provision should be made as close to where demand arises in an efficient and effective way and should not be an afterthought – provision is essential and should be planned as part of spatial planning. The needs of service providers need to be understood at an early stage to inform future planning. Careful consideration needs to be given to the viability of development.

### **Infrastructure Delivery**

- 3.44. The provision of infrastructure to support existing and new communities is obviously essential. This ranges from transport to education to green space, as discussed in various sections above. In order for infrastructure to be delivered effectively there is a need to:

- understand where demand will arise
  - identify, prioritise and agree on that infrastructure
  - consult with relevant infrastructure providers
  - identify funding mechanisms to enable infrastructure delivery
  - the viability of development.
- 3.45. Funding is secured in a variety of ways including through the collection of Community Infrastructure Levy funds, through s106 agreements, bids and grants administered by GFirst LEP, bids to various Government Agencies and so on. Most of these funding mechanisms are competitive – competition with other areas of the country for private and government investment, competition between competing infrastructure projects within the GSoCG area, or onsite competition between the various demands placed on the development sector. Gloucestershire has a good track record of winning competitive funding and the GSoCG will be a key tool in future bids in articulating the collective ambition and delivery of growth.
- 3.46. At a both a strategic and local, non-strategic level, infrastructure needs are identified in a range of statutory and non-statutory documents including Local Plans, Infrastructure Development Plans and annual Infrastructure Funding Statements, the Local Transport Plan, Education Place Planning Strategies, the Natural Capital initiative and so on.
- 3.47. There is no single source document that identifies the agreed strategic infrastructure requirements for Gloucestershire. Such a document, together with a clear strategic direction of growth in Gloucestershire, would present a solid basis to encourage investment in its various forms from the public and private sector. Furthermore, such an approach would fit well with current proposed reforms to the development contribution regime. The various strategic infrastructure concepts listed in the preceding sections will need to be planned for and funded.
- 3.48. Various pieces of work are either underway or under consideration. The parties are exploring the potential for a single Local Developer Guide for Gloucestershire. This document will provide a clear practice guide for developers on how the parties expect infrastructure to be funded by development, building upon adopted policies and standards set out in local plans.

### **Minerals and Waste**

- 3.49. There are strategic minerals deposits in Gloucestershire that should be secured until they need to be used, perhaps in association with appropriate development. These are dealt with through Minerals and Waste Local Plans developed by the County Council.
- 3.50. Sufficient provision needs to be made for the waste management facilities required to implement a positive and progressive reuse, recycle, recover approach to resources, striving towards the achievement of a circular economy.



**Appendix 3 - List of 'Agreements' not agreed by any and/or all parties**

Agreement Name and Number	Party/Parties not in agreement	Non agreement Party/Parties' preferred text
Paragraph 5.2	Tewkesbury Borough Council	In November 2018, the GEGJC endorsed a proposal to develop a "statement of common ground" as the most effective way of advancing these commitments.
Agreement 1	Tewkesbury Borough Council	The parties agree to the development of a Gloucestershire Spatial Development Strategy and it is recognised that agreeing this statement of common ground provides the most effective way of advancing this commitment.
Climate Change agreements 3 - 6	Tewkesbury Borough Council	<p><b>Agreements</b></p> <ol style="list-style-type: none"> <li>3. The parties agree that the climate emergency presents risks to the county that are systemic, and unprecedented in scale and potential impact.</li> <li>4. The parties agree that responses to the climate and emergency must be commensurate with the scale and severity of the risk, and that coordinated action is the most effective means of responding.</li> <li>5. The parties agree that strategic planning decisions have a role to play in the reduction of carbon in contributing to local and global sustainability, and that our decisions must be informed by the climate emergency and wherever possible deliver a positive contribution to climate change mitigation and adaptation. Responding to the Climate Emergency will be the 'golden thread' that runs through the strategic planning activities and the outputs of this SoCG, responding to our commitments to Carbon net zero.</li> </ol>
Natural Environment and Green Infrastructure agreement 24	Tewkesbury Borough Council	

Appendix 4 - Pro-forma Action Plan to deliver on commitments in the Gloucestershire Statement of Common Ground

Strategic Matter	Proposed Action	Anticipated Action Outcome	Action Timeline	Action Budget	Action Lead Officer	Action Team
Climate Change						
Housing						
Employment						
The Green Belt						
Transport Provisions						
Digital Network						
Natural Environment and Green Infrastructure						
Energy Production						
Health and Social Infrastructure						
Infrastructure Delivery						
Minerals and Waste						

**Gloucester City Plan (2011-2031)**  
**STATEMENT OF COMMON GROUND**

**between**

**Gloucester City Council**  
**Cheltenham Borough Council**  
**Tewkesbury Borough Council**  
**Cotswold District Council**  
**Forest of Dean District Council**

**10th May 2021**

**1. Introduction and background**

1.1 This Statement of Common Ground (SoCG) has been prepared by Gloucester City Council, Cheltenham Borough Council, Tewkesbury Borough Council, Cotswold District Council and Forest of Dean District Council, referred to hereafter as ‘the parties’. It documents the current position and future work regarding planning for Gypsy, Traveller and Travelling Showpeople communities within Gloucestershire.

**2. Matters that are agreed**

2.1 Planning Policy for Traveller Sites (PPTS, 2015) sets out the Government's planning policy for traveller sites, which should be read alongside the National Planning Policy Framework (NPPF, 2019). PPTS requires local authorities to undertake an assessment of need for Gypsy, Traveller and Travelling Showpeople communities and, working collaboratively with other local authorities, develop fair and effective strategies to meet need through the identification of land for sites over a reasonable timescale.

2.2 The parties, together with Stroud District Council and Gloucestershire County Council, worked in partnership in commissioning a county-wide Gypsy and Traveller Accommodation Assessment (GTAA), which was published in 2017, setting out needs between 2016 and 2031. The GTAA was prepared by an independent planning consultant, Opinion Research Services (ORS) and forms part of the evidence base supporting Local Plans for district authorities in Gloucestershire (Submission Document HOU004).

2.3 It is recognised that Gloucester City has a tightly drawn local authority boundary, with significant planning constraints and a limited land supply. It is accepted that there are no deliverable sites within the administrative area of Gloucester City and that consequently, there are currently unmet needs relating to the Gypsy, Traveller and Travelling Showpeople communities. It is therefore necessary to consider how neighbouring authorities can assist with addressing these unmet needs.

2.4 The parties have and will continue to work collaboratively on strategic cross-boundary planning matters and to satisfy the requirements of the Duty to Cooperate, including those relating to Gypsy, Traveller and Travelling Showpeople matters, through the preparation and review of evidence and Local Plans.

### **Future work**

- 2.5 At the time of writing the parties and Stroud District Council, working in collaboration with Gloucestershire County Council, are in the process of procuring a consultant to update the GTAA, which will re-base needs from 2021. It is anticipated the final report will be issued to the authorities September/October 2021.
- 2.6 Following this, the parties and Stroud District Council have agreed to work in partnership to commission a consultant to undertake a Gypsy, Traveller and Travelling Showpeople Site Assessment Study (SAS). The SAS is being staggered behind the update to the GTAA to allow for the consideration pitch/plot delivery against identified needs.
- 2.7 The parties recognise that it may be necessary to identify sites to provide for unmet Gypsy, Traveller and Travelling Showpeople need in neighbouring local authorities, where possible and appropriate, when justified through a shortage, or lack of any suitable/deliverable sites to provide for that need where it arises.
- 2.8 This is reflected in the emerging Gloucestershire Statement of Common Ground, relating to strategic planning matters in the county. It has been prepared in partnership between the six district authorities, Gloucestershire County Council, and the Gloucestershire Local Enterprise Partnership. The draft statement includes an agreement to make provision for the full range of housing needs in the right places and the right times, including Gypsies, Travellers and Travelling Showpeople. It further recognises that it may result in a local authority accommodating the needs of another local authority, where a local authority is unable to accommodate the development in their own administrative area and where it represents the most sustainable form of development.
- 2.9 The Gloucestershire Statement of Common Ground is in the final stages of preparation and will be put to each local authority for approval over the coming months.

### **3. Matters that are not agreed**

- 3.1 None

### **4. Conclusion**

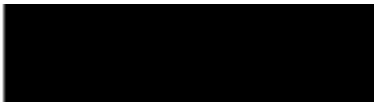
- 4.1 The parties agree that:
  1. Gloucester City has a tightly drawn local authority boundary, with significant planning constraints and limited land supply, and that there are currently no deliverable site opportunities to provide for that need in the administrative area of Gloucester City Council. The City Council will continue to actively investigate opportunities to meet unmet needs within the administrative area, where they arise.
  2. In satisfying the Duty to Cooperate, the parties have and will continue to work in partnership and collaborate to identify needs and sites to provide for the Gypsy, Traveller and Travelling Showpeople community, including on a cross-boundary basis where justified and where it represents the most sustainable form of development, through Local Plan reviews.
  3. Gloucester City Council has complied with the Duty to Cooperate in preparing the Gloucester City Plan through the various stages to date.

**Signed on behalf of Gloucester City Council**



**Ian Edward – Head of Place**

**Signed on behalf of Cheltenham Borough Council**



**Mike Holmes – Interim Head of Planning**

**Signed on behalf of Tewkesbury Borough Council**



**Planning Policy Manager – Gloucester City Council**

**Signed on behalf of Cotswold District Council**



**James Brain – Forward Planning Manager**

**Signed on behalf of Forest of Dean District Council**



**Nigel Gibbons – Forward Planning Manager**

**Dated**

**10<sup>th</sup> May 2021**

**From:** (null)  
**Subject:**  
**Date:** 10 May 2021 at 15:57  
**To:**

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Dear Adam Gooch

Thank you for the teams call today. As I explained I am pleased to confirm that officers at Stroud District Council have been working with you in both drafting the Statement of Common Ground and commissioning new Gypsy and Traveller Accommodation Assessment work. As I explained unfortunately due to the elections, it is not currently possible to determine who will be able to agree and sign the Statement of Common Ground under our scheme of delegation requirements. I hope this will be resolved shortly and I apologise for any inconvenience caused.

Regards

Conrad Moore

Conrad Moore MRTPI, MIFM, ALGE.  
Principal Planner.  
Planning Strategy.  
Development Services.

**Stroud District Local Plan (2020-2040)**  
**STRATEGIC HOUSING MATTERS STATEMENT OF COMMON GROUND**

**between**

**Cheltenham Borough Council  
Cotswold District Council  
Forest of Dean District Council  
Gloucester City Council  
Stroud District Council  
Tewkesbury Borough Council**

**October 2021**

**1. Introduction and background**

- 1.1 A Gloucestershire Statement of Common Ground (GSoCG) covering agreements on various strategic planning matters has been prepared by the seven local authorities in Gloucestershire and GFirstLEP. The GSoCG provides for additional or supplementary Statements of Common Ground to be prepared by participating local authorities, particularly within the context of emerging local plans.
- 1.2 This additional Statement of Common Ground (SoCG) covering strategic housing matters has been prepared at the submission of the Stroud District Local Plan (2020-2040), and has been signed by Cheltenham Borough Council, Cotswold District Council, Forest of Dean District Council, Gloucester City Council, Stroud District Council and Tewkesbury Borough Council, referred to hereafter as ‘the parties’. Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council are also collectively known as ‘the JCS authorities’.
- 1.3 A SoCG between the parties relating to Gypsy, Traveller and Travelling Showpeople matters was approved in May 2021 within the context of the Gloucester City Plan and remains up-to-date.

**2. Strategic matters that are agreed**

***Context and actions taken to date***

- 2.1 The National Planning Policy Framework (NPPF) requires strategic policies relating to housing to be informed by the production of a local housing needs assessment. This should determine the minimum number of homes needed using the standard method and the size, type and tenure of housing needed (NPPF, para. 61-62).
- 2.2 In 2018 the parties, with Gloucestershire County Council, jointly commissioned consultants to complete a Gloucestershire Local Housing Needs Assessment (LHNA) for the Gloucestershire Housing Market Area. A final report was published in September 2020. The LHNA adheres to the requirements of the NPPF and the associated planning practice guidance.
- 2.3 The report concludes, based on a range of indicators, that Gloucestershire forms a single housing market area (HMA). Whilst this does not preclude overlap occurring with

neighbouring HMAs, from an administrative point of view, the parties form the most appropriate grouping.

- 2.4 The principal duty to co-operate issue surrounding housing provision within Gloucestershire is related to meeting the needs arising within Gloucester City and Cheltenham Borough. It is recognised that these settlements have a limited capacity to accommodate needs within existing boundaries and that, depending upon the scale of future needs and the availability of land, development may need to be located within adjoining authority areas.
- 2.5 A Statement of Cooperation was drafted by Stroud District Council in 2013 and agreed in 2014 between Stroud District Council and the JCS authorities to set out the process and triggers by which any unmet objectively assessed needs arising from within their administrative areas could be considered through a review of the Joint Core Strategy (JCS) and the Stroud District Local Plan.
- 2.6 Subsequently the adopted Stroud District Local Plan included within Core Policy 2 a commitment to give “due consideration to the need to assist other local planning authorities in this housing market area in meeting their unmet objectively assessed development and infrastructure needs, including through an early review of this Local Plan, to ensure that any shortfalls that may arise in the delivery of housing and employment growth (as identified through the other authority’s local plan process) are provided for in sustainable locations.” In the light of these unmet needs, the District Council decided to commence an early review of the Stroud District Local Plan in 2017.
- 2.7 In December 2017, the Gloucester, Cheltenham and Tewkesbury Core Strategy (JCS) was adopted. The JCS recognises that “Gloucester has a good supply of land for the short to medium term that will enable it to meet its requirements to at least 2028/9. This will allow adequate time for an early review of the plan to explore further the potential to meet Gloucester’s needs in the longer term towards the end of the plan period. This would allow the consideration of additional development options that may be become available, both within and outside the JCS area. This could include the unlocking of further development opportunities within the urban area, as well as potential new urban extensions in Tewkesbury Borough and Stroud District or elsewhere in the housing market area.” (JCS, para. 3.2.16)
- 2.8 In December 2018 Cheltenham Borough, Forest of Dean District, Gloucester City, Stroud District and Tewkesbury Borough councils jointly commissioned an assessment to inform the search for suitable and available strategic development land beyond the existing settlement boundaries in the study area. The methodology for the study was developed through an iterative process with close ongoing liaison with Gloucestershire County Council and other statutory consultees. This was intended to inform local plan and JCS reviews and the preparation of an informal spatial framework for the whole of Gloucestershire in the longer term, but was also intended to consider the matter of accommodating Gloucester’s longer term housing needs and the Interim Report published in October 2019 was prepared specifically to address this issue.
- 2.9 The Interim Report identified 7 assessment areas as having the highest accessibility to Gloucester (1 area within Gloucester, 3 areas within Stroud and 3 areas within Tewkesbury) and an additional 3 areas (all within Tewkesbury) that currently have lower accessibility to Gloucester but which may be able to be improved and achieve similar accessibility levels to those outlined above, following investment associated with potential development.



- 2.10 The Final Report published by Stroud District Council in May 2020 makes the point that whilst the Assessment “provides an indication of the potential planning merits of development options it does not provide an evaluation of the relative merits of development options overall i.e. it does not provide an overall ranking of options...the preferred balance to be struck in relation to different topics is a matter to be assessed in relation to the defined priorities of the County’s Local Plans and the JCS” (para. 3.20).
- 2.11 The identification of the most sustainable option to meet Gloucester’s future needs therefore needs to be assessed through the plan making process. Unfortunately, the JCS review process and Stroud Local Plan process are not currently aligned, due to the need for an early review of the Stroud Local Plan which was adopted in 2015. The JCS was adopted in December 2017.
- 2.12 To avoid significant delay with the Stroud Local Plan, Stroud District Council took the decision in 2019 to safeguard a site at Whaddon on the edge of Stroud (within one of the identified assessment areas in the Interim Report – area 32) to contribute to meeting Gloucester’s needs, should it be required and provided it is consistent with the approved strategy of the JCS review. This position has been confirmed in the Pre-Submission Draft Local Plan.
- 2.13 The JCS authorities have supported the approach of Stroud District Council towards the safeguarding of the site at Whaddon in their Regulation 19 response to the Pre-Submission Stroud District Local Plan.
- 2.14 Cotswold District Council and Forest of Dean District Council did not make representations at the Stroud District Local Plan Regulation 19 stage and have not identified any issues with the Stroud District Local Plan relating to strategic housing matters.

***Commitments for future work and collaboration***

- 2.15 The JCS authorities have stated in their Regulation 19 response that “The next stage of the JCS process will present the preferred strategy for the review and identify reasonable alternatives to provide for development needs. As part of this process an urban capacity study will be undertaken in the coming months, from which it will be established Gloucester’s potential housing shortfall” (JCS Regulation.19 response para. 9). The timetable for the JCS Review is currently being reviewed and will be available in the autumn 2021.
- 2.16 Subject to confirmation that there is a housing shortfall of a scale requiring strategic allocation in another local authority area, and subject to confirmation that the JCS preferred strategy demonstrates that the site at Whaddon is a preferred sustainable location having considered all reasonable alternatives, Stroud District Council will propose a modification to the Stroud District Local Plan specifically allocating the site at Whaddon to help address the unmet needs of Gloucester.
- 2.17 In the event that timings prevent the above confirmations during the Stroud District Local Plan examination, the parties agree to work together to explore options for releasing the site post adoption, if still required to meet a housing shortfall and if still the preferred sustainable location having considered all reasonable alternatives.

- 2.18 In the event that the Whaddon site is allocated, Stroud District Council and Gloucester City Council will enter into an agreement relating to the delivery of the site, including the preparation of a development brief including indicative masterplan and the establishment of detailed infrastructure requirements and necessary developer contributions.
- 2.19 The JCS authorities in their Regulation 19 response have identified that there are a number of other allocated housing sites on the Gloucester fringe which may provide for unmet Gloucester/JCS needs if required and in accordance with the JCS Review.
- 2.20 In the event that the scale of unmet housing needs from Gloucester may require the allocation of other sites in adjoining local authority areas, the parties will commission jointly an assessment of the relevant sustainability of all reasonable alternative site options within the context of the latest adopted and emerging local plans framework and will seek to allocate the most sustainable form of development through the relevant local plan review process.
- 2.21 The parties agree that Stroud District Council, in preparing the Stroud District Local Plan (2020-2040), has engaged proactively and positively with neighbouring authorities on strategic planning matters relating to housing through the Duty to Cooperate.

**3. Matters that are not agreed**

3.1 None

**4. Signatories**

Signed on behalf of Cheltenham Borough Council

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Signed on behalf of Cotswold District Council

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Signed on behalf of Forest of Dean District Council

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Signed on behalf of Gloucester City Council

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Signed on behalf of Stroud District Council

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Signed on behalf of Tewkesbury Borough Council

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Dated

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**Stroud District Local Plan (2020-2040)**  
**STRATEGIC EMPLOYMENT MATTERS STATEMENT OF COMMON GROUND**

**between**

**Cheltenham Borough Council  
Cotswold District Council  
Forest of Dean District Council  
Gloucester City Council  
Stroud District Council  
Tewkesbury Borough Council  
GFirstLEP**

**October 2021**

**1. Introduction and background**

- 1.1 A Gloucestershire Statement of Common Ground (GSoCG) covering agreements on various strategic planning matters has been prepared by the seven local authorities in Gloucestershire and GFirstLEP. The GSoCG provides for additional or supplementary Statements of Common Ground to be prepared by participating local authorities, particularly within the context of emerging local plans.
- 1.2 This additional Statement of Common Ground (SoCG) covering strategic employment matters has been prepared at the submission of the Stroud District Local Plan (2020-2040), and has been signed by Cheltenham Borough Council, Cotswold District Council, Forest of Dean District Council, Gloucester City Council, Stroud District Council, Tewkesbury Borough Council and GFirstLEP, referred to hereafter as ‘the parties’. Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council are also collectively known as ‘the JCS authorities’.

**2. Strategic matters that are agreed**

***Context and actions taken to date***

- 2.1 The National Planning Policy Framework (NPPF) requires strategic policies relating to the economy and employment to “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration” (NPPF, para. 82) and to be the result of effective engagement with relevant bodies including Local Enterprise Partnerships (NPPF, para. 25).
- 2.2 GFirst LEP is the Local Enterprise Partnership (LEP), set up by Government in 2011, that covers the county. The LEP’s role is to provide strategic economic leadership for their areas, bringing public and private sector partners and their resources together around a common set of goals, determining local economic priorities to drive economic growth and the creation of local jobs.
- 2.3 The boundaries of the GFirstLEP area coincide exactly with the administrative boundaries of Gloucestershire and this has enabled a high degree of integration between the LEP and the Gloucestershire authorities. The GFirst LEP Board includes the Leader of Gloucestershire

County Council and Stroud District Council (representing the 2nd tier authorities in the area). In 2014 a Gloucestershire Economic Growth Joint Committee (GEGJC) was established as a statutory joint committee made up of the seven Gloucestershire Councils, to provide the formal link between local government and the LEP Board, providing a mechanism for collective and binding decisions between councils and for local democratic oversight of the use of the local growth fund.

- 2.4 The parties have input positively into the contents of both the GFirstLEP produced Strategic Economic Plan (SEP)(2014 and 2018) and the draft Local Industrial Strategy (LIS) (2019) and Stroud District Council has used these documents to develop the Local Plan development strategy.
- 2.5 The SEP aims to provide good quality space in areas of good connectivity for businesses. The M5 corridor is identified as a Growth Zone, with sites close to motorway junctions identified as having the potential to deliver employment land attractive to new businesses and to create opportunities for existing businesses to grow. The aim is to realise the potential of this opportunity by operating a fast-track planning process; by ensuring the right infrastructure in proximity to the sites; and by exerting influence over the type of employment to be created within these locations.
- 2.6 The LIS sets out the LEP's strategy to boost economic productivity in Gloucestershire and to guide funding investments made through both the LEP and other national schemes. The LEP's ambition through this strategy is to promote Gloucestershire as a "magnet county" able to successfully attract and retain talent in the region. The LIS identifies Gloucestershire's particular focus for growth surrounding its existing industrial strengths including: advanced manufacturing and engineering; aerospace; agri-tech; cyber-tech; and green growth. To underpin this strategy, the LIS sets out the importance of investing in people in order to attract and retain a talented workforce and realise the regions ambition as a 'magnet county'. A particular issue Gloucestershire faces is its ageing population and the strategy therefore looks at various ways to retain and attract young people. Another important element of this strategy covers the need to improve connectivity across the region, considering investment in cycle links, rail projects and becoming a pilot for innovative technology driven transport solutions and high-quality digital infrastructure.
- 2.7 The principal duty to co-operate issue surrounding the economy and employment within Gloucestershire is how the local authorities can work together to deliver the clear vision and strategy established by the SEP and more recently articulated by the emerging LIS to the benefit of Gloucestershire as a whole.
- 2.8 In 2019 the six local planning authorities and Gloucestershire County Council jointly commissioned an Economic Needs Assessment (ENA) for Gloucestershire. This ENA provides a high-level assessment of the Gloucestershire economy, investigating the economic potential of Gloucestershire and identifying realistic yet aspirational growth scenarios based on economic forecasts and modelled scenarios for the delivery of employment land (B class uses).
- 2.9 The ENA concludes that on the balance of evidence, and adopting a 'best fit' approach to local authority boundaries, the six Gloucestershire districts can be considered to form a single functional economic market area (FEMA). The ENA provides a baseline assessment of the local and regional economic dynamics in Gloucestershire and examines the local commercial property markets to set out requirements by sector and geographical area. An

extensive examination of economic forecasts and policy drivers leads to the development of a number of labour demand and labour supply scenarios to establish future employment land requirements.

- 2.10 In preparing the Pre-Submission Stroud District Local Plan, the Council has sought to reflect the growth aspirations of the GFirstLEP by seeking to meet two of the highest scenarios for employment land based upon the expected labour supply and a labour demand growth scenario based on supporting growth in the key LIS sectors. To support the key LIS sectors, the Plan identifies six key segments of market demand set out in the ENA and the development strategy and strategic allocations seek to deliver on these requirements.
- 2.11 GFirstLEP did not make representations at the Stroud District Local Plan Regulation 19 stage but the GFirstLEP's Construction and Infrastructure Business Group did respond to the 2019 Draft Plan Regulation 18 stage to state that the employment strategy was supported by the LEP and that "The Local Plan is considered to provide a good range and distribution of employment sites across the District that should help diversify the employment needs of the District and meet future employment trends." (GFirstLEP Reg.18 response April 2020)
- 2.12 The JCS authorities have supported the Stroud District Local Plan approach towards the economy and employment land in their Regulation 19 response, stating that the strategy aligns with the strategy of the adopted JCS, the aspirations of the SEP and the emerging LIS.
- 2.13 Cotswold District Council and Forest of Dean District Council did not make representations at the Stroud District Local Plan Regulation 19 stage and have not identified any issues with the Stroud District Local Plan relating to strategic employment matters.

***Commitments for future work and collaboration***

- 2.14 The JCS authorities have raised in their Regulation 19 response the potential for the proposed employment land supply in Stroud District to address any unmet Gloucester/JCS needs, should they be required and in accordance with the JCS Review (JCS Reg.19 response para. 30).
- 2.15 No shortfall of employment land is identified in the adopted JCS and, given the stage of the JCS Review, it has not been possible to establish if there is a shortfall of employment land for that plan period. Consequently Stroud District Council, in preparing the Stroud District Local Plan, has not identified a requirement in the Local Plan to address any unmet needs.
- 2.16 However, Stroud District Council is mindful of its duties and responsibilities and is willing to work with the JCS authorities through the JCS Review to examine whether there is likely to be a shortfall in employment land provision requiring authorities within the FEMA to assist.
- 2.17 The JCS authorities have stated in their Regulation 19 response that "The next stage of the JCS process will present the preferred strategy for the review and identify reasonable alternatives to provide for development needs. As part of this process an urban capacity study will be undertaken in the coming months, from which it will be established Gloucester's potential housing shortfall, and any employment shortfall for the JCS area" (JCS Reg.19 response para. 9). The timetable for the JCS Review is currently being reviewed and will be available in the autumn 2021.

2.18 In the event that the scale of unmet employment needs may require the allocation of other sites in adjoining local authority areas, the parties will commission jointly an assessment of the relevant sustainability of all reasonable alternative site options within the context of the latest adopted and emerging local plans framework and will seek to allocate the most sustainable form of development through the relevant local plan review process.

2.19 The parties agree that Stroud District Council, in preparing the Stroud District Local Plan (2020-2040), has engaged proactively and positively with neighbouring authorities and GFirstLEP on strategic planning matters relating to employment through the Duty to Cooperate.

**3. Matters that are not agreed**

3.1 None

**4. Signatories**

Signed on behalf of Cheltenham Borough Council

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Signed on behalf of Cotswold District Council

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Signed on behalf of Forest of Dean District Council

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Signed on behalf of Gloucester City Council

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Signed on behalf of Stroud District Council

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Signed on behalf of Tewkesbury Borough Council

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Signed on behalf of GFirstLEP

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Dated

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**Stroud District Local Plan (2020-2040)**  
**STRATEGIC MATTERS STATEMENT OF COMMON GROUND**

**between**

**Gloucestershire County Council**  
**Stroud District Council**

**October 2021**

**1. Introduction and background**

- 1.1 A Gloucestershire Statement of Common Ground (GSoCG) covering agreements on various strategic planning matters has been prepared by the seven local authorities in Gloucestershire and GFirstLEP. The GSoCG provides for additional or supplementary Statements of Common Ground to be prepared by participating local authorities, particularly within the context of emerging local plans.
- 1.2 This additional Statement of Common Ground (SoCG) covering strategic housing matters has been prepared at the submission of the Stroud District Local Plan (2020-2040), and has been signed by Stroud District Council and Gloucestershire County Council at officer level referred to hereafter as ‘the parties’.

**2. Strategic matters that are agreed**

**Transport**

***Context and actions taken to date***

- 2.2 The National Planning Policy Framework requires transport issues to be considered from the earliest stages of plan-making. The planning system should actively manage patterns of growth to realise opportunities from existing and proposed transport infrastructure, to promote walking, cycling and public transport and to address impacts on transport networks and the environmental impacts of traffic and transport infrastructure. “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes (NPPF, para. 104-105).
- 2.3 Transport assessment work on the Stroud District Local Plan has been carried out at a number of key stages in the plan making process and has involved partnership working with transport and planning authorities and key stakeholders. The principal transport evidence includes:
- Strategy Options Transport Discussion Paper (July 2018)
  - Sustainable Transport Strategy (February 2021)
  - Traffic Forecasting Report (TFR) (March 2021)
  - Infrastructure Delivery Plan (IDP) (May 2021)
- 2.4 The principal duty to co-operate issue relates to working in partnership with transport and planning authorities and National Highways (formerly Highways England) to ensure that the transport network can accommodate the required housing and employment growth levels for Stroud District (and unmet needs arising from Gloucester City) in a sustainable manner



which limits the need to travel, supports a choice of transport modes, makes the most of the existing strategic transport network and delivers mitigation where required.

- 2.5 Particular transport cross-boundary matters relate to: the transport network within the Gloucester fringe where impacts from Stroud and JCS related growth combine; the opportunities for new public transport and cycling and walking connections on the South Gloucestershire/Stroud boundary; and existing and likely future capacity issues at M5 Junction 12 (Gloucester fringe) and M5 Junction 14 (located within South Gloucestershire).
- 2.6 A Stroud District Local Plan Transport Group was set up in 2017 to progress partnership working on the Stroud District Local Plan transport matters. A core group of Stroud District, Gloucestershire County Council and National Highways met regularly during the plan making process to develop the above studies and to discuss key issues and potential mitigation measures. South Gloucestershire Council was invited periodically to input into the assessment work and to discuss key issues and potential mitigation measures, especially relating to impacts on and mitigation measures for M5 Junction 14.
- 2.7 National Highways, South Gloucestershire Council, Gloucestershire County Council and Stroud District Council have also met with a Developer Group regularly since 2017 to discuss planned growth in the vicinity of M5 Junction 14 and potential mitigation measures.
- 2.8 As part of their ongoing cooperation, Gloucestershire County Council and Stroud District Council have agreed a third party protocol to allow third parties to access the Stroud SATURN model and traffic scenarios to assist with site specific modelling for future planning applications.
- 2.9 Other transport related joint working has included: Stroud District Council inputting into the latest Gloucestershire Local Transport Plan; working with Gloucestershire County Council to deliver improvements to the strategic cycling and walking network within the District; and seeking improvements to the rail network through membership of the Gloucestershire Community Rail Partnership.
- 2.10 The parties agree that they have co-operated on developing a transport evidence base throughout the preparation of the Stroud District Local Plan.
- 2.11 The parties agree that early consideration of transport matters fed into the development of the Stroud District Local Plan development strategy.
- 2.12 The parties agree with the broad findings of the Strategy Options Transport Discussion Paper (2018) and in particular that a development strategy based upon a concentrated growth option is a more sustainable option than a dispersed growth option.
- 2.13 Gloucestershire County Council agrees that the TFR (2021) reflects all of their comments and inputs and that the report accurately presents the findings of the modelling assessment.
- 2.14 In summary, the parties agree that Stroud District Council, in preparing the Stroud District Local Plan (2020-2040), has engaged proactively and positively with Gloucestershire County Council on strategic transport matters through the Duty to Cooperate. Gloucestershire County Council's Reg.19 representations concentrate on remaining concerns they have with two specific sites rather than with the wider process.

### ***Commitments for future work and collaboration***

- 2.15 The parties agree to engaged proactively and positively on ongoing strategic transport matters relating to the Stroud District Local Plan.
- 2.16 The parties agree to work together where possible to develop any further transport analysis required to provide evidence for the Stroud District Local Plan at examination.
- 2.17 The parties agree to work together to implement the transport policies contained within the Stroud District Local Plan (2020 to 2040) when adopted.

### **Waste and Minerals**

#### ***Context and actions taken to date***

- 2.18 Gloucestershire County Council is the local Minerals and Waste Planning Authority (MWPA). A representative attends the Gloucestershire County Planning Officers Group (CPOG) regularly to discuss strategic planning matters with the local planning authorities and Stroud District Council works closely with Gloucestershire County Council as a waste collection authority.
- 2.19 In December 2018 Cheltenham Borough, Forest of Dean District, Gloucester City, Stroud District and Tewkesbury Borough councils jointly commissioned an assessment to inform the search for suitable and available strategic development land beyond the existing settlement boundaries in the study area. The methodology to undertake the study was developed through an iterative process with close ongoing liaison with Gloucestershire County Council and other statutory consultees. The assessment methodology included identifying constraints relating to waste sites and mineral resources and including such matters within the assessment framework.
- 2.20 Similarly, in the assessment of the emerging Stroud District Local Plan and in assessing potential sites for allocation in particular, the sustainability appraisal process has taken account of constraints relating to waste sites and mineral resources and including such matters within the assessment framework.
- 2.21 The Pre-Submission Stroud District Local Plan (2020-2040) recognises the importance of waste and minerals planning within the overall strategic planning context and includes two sites suitable for strategic residual recovery facilities on the Policies Map, which have been allocated in the adopted Gloucestershire Waste Core Strategy. (SDLP, para. 1.0.11)
- 2.22 Gloucestershire County Council has raised concerns in their Reg.19 representations regarding a number of policies and sites within the Stroud District Local Plan failing to reference various waste and minerals matters. Appropriate wording is recommended by them to overcome their concerns.

#### ***Commitments for future work and collaboration***

- 2.23 Stroud District Council acknowledges the need to make appropriate references to minerals and waste matters within the Stroud District Local Plan.

2.24 The parties agree to work together through the examination process to resolve the outstanding matters raised by Gloucestershire County Council by agreeing appropriate modifications to the Plan where necessary.

**3. Matters that are not agreed**

3.1 Gloucestershire County Council has significant concerns regarding the allocation of strategic sites PS36 Sharpness and G2 Land at Whaddon on the transport grounds set out within their Reg.19 representation, based on the available submitted transport evidence, and consider the Plan to be unsound on this basis.

3.2 Gloucestershire County Council objects to the wording of various policies and site allocations on waste and minerals grounds set out within their Reg.19 representation. Whilst the County Council has put forward wording to resolve these matters, and Stroud District Council wishes to resolve these matters through agreeing appropriate modifications through the examination process where necessary, the matters remain unresolved at the current time.

**4. Signatories**

Signed on behalf of Gloucestershire County Council  
Simon Excell, Lead Commissioner, Strategic Infrastructure



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Dated

18 October 2021.....

Signed on behalf of Stroud District Council  
Mark Russell, Head of Planning Strategy and Economic Development



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Dated

12 October 2021.....

**Stroud District Local Plan (2020-2040)**  
**STRATEGIC MATTERS STATEMENT OF COMMON GROUND**

**between**

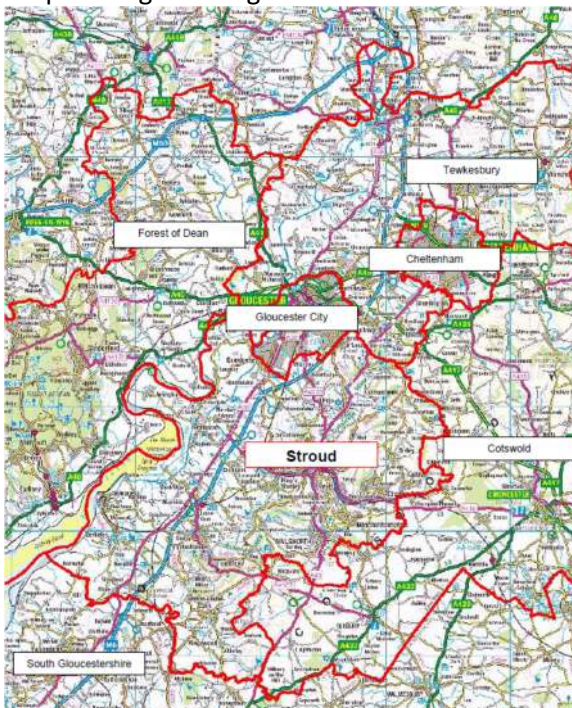
**South Gloucestershire Council**  
**Stroud District Council**

**October 2021**

**1. Introduction and background**

- 1.1 This Statement of Common Ground (SoCG) covering strategic planning and transport matters has been prepared at the submission of the Stroud District Local Plan (2020-2040), and has been signed by South Gloucestershire Council and Stroud District Council, referred to hereafter as ‘the parties’.
- 1.2 The purpose of the SoCG is to set out as at September 2021 areas of agreement between the authorities in respect of how strategic cross boundary issues have been addressed through the preparation of the Stroud District Local Plan.
- 1.3 South Gloucestershire Council and Stroud District Council are adjoining local planning authorities and share an administrative boundary.

Map of Neighbouring Local Authorities



**2. Governance arrangements**

- 2.1 Stroud District Council has established formal governance arrangements with the other local planning authorities within Gloucestershire. A Gloucestershire SOCG has been developed to identify how these authorities will work together on strategic planning and transport matters. South Gloucestershire Council has established formal governance arrangements

with neighbouring authorities to the south through the West of England Combined Authority (WECA). These formal arrangements reflect the primary functional relationships between adjoining authorities on strategic planning and transport matters.

- 2.2 South Gloucestershire Council and Stroud District Council have relied on less formal arrangements of liaison through regular meetings of senior corporate officers and planning officers, and more intensive engagement at key stages in the plan-making process.

### **3. Key strategic matters that are agreed**

- 3.1 The key strategic matters that have been relevant during the preparation of the Stroud District Local Plan have been:

- The housing requirements of the respective Housing Market Areas (HMAs)
- The impact of growth proposals on the Severn Estuary
- The identification and delivery of strategic transport measures to support the sustainable delivery of growth proposals

#### **The housing requirement**

- 3.2 The Gloucestershire Local Housing Needs Assessment (2020) identifies Gloucestershire as a HMA. This does not prevent overlaps occurring with other HMAs. For example, the West of England SHMA (2015) indicated that the Bristol HMA extends into the southern part of Stroud District.
- 3.3 The parties agree it is an appropriate pragmatic approach to ‘snap’ the boundary of the Gloucestershire HMA to include Stroud District and to ‘snap’ the boundary of the West of England HMA to include South Gloucestershire.
- 3.4 The Stroud District Local Plan identifies a housing requirement of at least 12,600 new dwellings to meet the needs arising from within Stroud District for the period 2020 to 2040. This requirement takes appropriate account of the standard housing method. A supply of 14,935 new dwellings is identified in the Local Plan.
- 3.5 The parties agree that the full needs of Stroud District for the period 2020 to 2040 can be met within its administrative boundaries and there is no requirement for South Gloucestershire Council to seek to address any unmet needs arising from within Stroud District at this time.
- 3.6 The Spatial Development Strategy for the WECA area, which will set the housing requirement for the region and South Gloucestershire Local Plan, is at a key stage of preparation. In the West of England Strategic Planning Forum the Combined Authority have indicated that the scale of need is extremely challenging in terms of both constraints and deliverability in the West of England, and they cannot therefore rule out that discussions on unmet need will need to take place. Such discussions if needed would be likely timed towards the end of 2021.
- 3.7 The parties agree to continue to work together to understand how the housing needs arising from within the WECA area should be accommodated.

## **Employment, Education, Training and Skills**

- 3.8 South Gloucestershire Council, Stroud District Council and Gloucestershire County Council are partners to the Western Gateway joint nomination of sites at Oldbury and Berkeley (known as Severn Edge) to host the UK Atomic Energy Authority's proposed world first prototype fusion plant and associated 'eco-system' of research and development, , businesses and training facilities (known as STEP). As a part of this the Councils along with other partners including Business West, Nuclear SW, South Gloucestershire and Stroud College, Magnox and Horizon Nuclear Power are working closely together and meeting regularly to maximise opportunities and address constraints that this project may bring. Given the scale of the proposed project, there are a range of socio-economic, environmental and transport opportunities and implications which are being jointly explored and addressed by the partners to the project.
- 3.9 On 14 October 2021 UKAEA announced that Severn Edge, comprising sites at Oldbury and Berkeley has been included on a shortlist of five sites for further exploration as to their potential suitability to host STEP. The parties will continue to work collaboratively with UKAEA and stakeholders to minimise impacts and maximise benefits of this project for the local and wider area. The parties further agree that should the fusion project not proceed in our geography, then the Oldbury and Berkeley sites may be suitable for other high quality employment uses.

## **The Severn Estuary**

- 3.10 Both South Gloucestershire and Stroud District border the Severn Estuary which is one of the largest estuaries in Britain and has the second highest tidal range in the world. It has a natural and cultural heritage which deserves special attention, and it is a living and working environment for many people who live around its shores and care about its future.
- 3.11 The parties have worked together within the broad Severn Estuary Partnership (SEP) which is an independent, estuary-wide non-statutory initiative led by local authorities and statutory agencies working on the English and Welsh sides of the Estuary to promote a sustainable approach to planning, management and development, for all who live and work around the Estuary.
- 3.12 Both parties are currently contributing to the Shoreline Management Plan 2 Review being undertaken by the Environment Agency, principally through the Severn Estuary Coastal Group (SECG). The Severn Estuary Shoreline Management Plan was developed in partnership by local authorities, regulators and other stakeholders, as a high level non-statutory policy document designed to assist coastal flood and erosion risk management planning. The SECG develops evidence for and recommends policy changes to the Shoreline Management Plan and exchanges information on a range of issues related to coastal planning.
- 3.13 South Gloucestershire Council, Gloucestershire County Council and Stroud District Council are also working together with other partners via the Severn Edge project to ensure an integrated approach to planning for and delivering the necessary flood resilience, including to meet the requirements of the proposed UKAEA STEP project, and to deliver environmental mitigation, Green Infrastructure enhancement and biodiversity net gain.
- 3.14 The Severn Estuary is a Special Area of Conservation (SAC) a Special Protection Area (SPA) and Ramsar site. In previous Reg.18 Stroud District Local Plan consultation stages, South Gloucestershire Council has commented on the Habitats Regulation Assessment (HRA) and

has requested that it be made aware of any significant effects identified within the assessment which cumulatively might have implications for that part of the European Site within South Gloucestershire.

- 3.15 South Gloucestershire Council in the Council's Reg.19 representation notes that Stroud District Council has followed national guidance in undertaking a Habitats Regulations Assessment and Appropriate Assessment on the potential impact of its proposals on the Severn Estuary European sites.
- 3.16 The parties agree that growth proposals set out within the Stroud District Local Plan can be subject to satisfactory mitigation measures to ensure no adverse impacts on the Estuary.
- 3.17 Stroud District Council has an adopted Stroud District Severn Estuary Recreation and Mitigation Strategy (SERaMS) including a catchment area of 7.7km for identifying a recreational impact from growth. Stroud District Council will undertake a future review of the SERaMS and will consult with South Gloucestershire Council on the contents of this Strategy.
- 3.18 The parties confirm that cooperative working to date between the two Councils has been satisfactory and that they will continue to co-operate and work together on Severn Estuary cross-boundary issues.

## **Transport**

### ***Context and actions taken to date***

- 3.19 The National Planning Policy Framework requires transport issues to be considered from the earliest stages of plan-making. The planning system should actively manage patterns of growth to realise opportunities from existing and proposed transport infrastructure, to promote walking, cycling and public transport and to address impacts on transport networks and the environmental impacts of traffic and transport infrastructure. "Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes (NPPF, para. 104-105).
- 3.20 Transport assessment work on the Stroud District Local Plan has been carried out at a number of key stages in the plan making process and has involved partnership working with transport and planning authorities and key stakeholders. The principal transport evidence includes:
- Strategy Options Transport Discussion Paper (July 2018)
  - Sustainable Transport Strategy (February 2021)
  - Traffic Forecasting Report (TFR) (March 2021)
  - Infrastructure Delivery Plan (IDP) (May 2021)
- 3.21 The principal duty to co-operate issue relates to working in partnership with transport and planning authorities and National Highways (formerly Highways England) to ensure that the transport network can accommodate the required housing and employment growth levels for Stroud District (and unmet needs arising from Gloucester City) in a sustainable manner which limits the need to travel, supports a choice of transport modes, makes the most of the existing strategic transport network and delivers mitigation where required. The impact of

proposed growth within Stroud is a cross boundary issue both to the north at Gloucester and to the south within South Gloucestershire.

- 3.22 Particular transport cross-boundary matters of relevance in this SoCG relate to: the opportunities for new public transport and cycling and walking connections on the South Gloucestershire/Stroud boundary; and existing and likely future capacity issues at M5 Junction 14 (located within South Gloucestershire).
- 3.23 South Gloucestershire Council and Stroud District Council planning officers meet regularly to discuss emerging strategic planning and transport matters and how they may impact across administrative boundaries. Since 2020 officers have also worked closely with Gloucestershire County Council through a working group to develop and promote a joint Oldbury-Berkeley proposal (known as Severn Edge) as part of the STEP UK fusion programme. Through this the Councils are working jointly to promote sustainable transport links and facilities including a direct pedestrian, cycle and sustainable vehicle link between the Oldbury and Berkeley sites, park and ride/share facilities and links to public transport, water transport direct to the site and to Sharpness Docks, as well as improvements to road access and the M5 J14 to enable the construction and operation of the STEP and/or other appropriate development proposals on these sites.
- 3.24 A Stroud District Local Plan Transport Group was set up in 2017 to progress partnership working on the Stroud District Local Plan transport matters. A core group of Stroud District, Gloucestershire County Council and National Highways met regularly during the plan making process to develop the above studies and to discuss key issues and potential mitigation measures. South Gloucestershire Council has been invited periodically to input into the assessment work and to discuss key issues and potential mitigation measures, especially relating to impacts on and mitigation measures for M5 Junction 14.
- 3.25 As part of their ongoing cooperation, National Highways, South Gloucestershire and Stroud District Council set up a process in 2018 to monitor and update the location and scale of planned development to ensure that likely traffic impacts on the Strategic Road Network (SRN), in particular M5 Junction 14 and surrounding roads, are identified and included within the assessment of development proposals.
- 3.26 National Highways, South Gloucestershire Council, Gloucestershire County Council and Stroud District Council have also met with a Developer Group consisting of promoters of housing growth proposals in South Gloucestershire (and latterly Stroud District) periodically since 2017 to discuss planned growth arising from both emerging development plans relating to South Gloucestershire and Stroud and speculative planning applications for housing and their likely impacts on M5 Junction 14 and adjoining roads and to identify potential mitigation measures and delivery mechanisms.
- 3.27 In summary, the parties agree that Stroud District Council, in preparing the Stroud District Local Plan (2020-2040), has engaged proactively and positively with South Gloucestershire Council on strategic transport matters through the Duty to Cooperate.

***Commitments for future work and collaboration***

- 3.28 South Gloucestershire Council has requested in the Council's Reg.19 representations to the Stroud District Local Plan "further clarification on what Stroud DC consider to be the infrastructure evidence base and the degree of certainty that can be attributed to



infrastructure interventions/ possible responses...The impacts from different developments therefore require fuller investigation and more detailed proposals for mitigation. We would assign a higher priority towards these issues working towards a comprehensive solution, including further joint working and a greater commitment to seeking developer contributions (potentially via a roof tax approach) to be worked up jointly with HE, SGC and WECA.” (SGC Reg.19 representation)

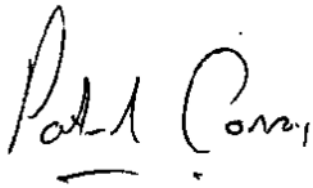
- 3.29 Within this context, South Gloucestershire seeks additional references within the Stroud District Local Plan to capacity issues at M5 Junction 14 and to improvements to strategic infrastructure to give more certainty to delivery, including Charfield Station, the Greenway and public transport improvements. The Council also seeks additional references to the need to secure improvements to infrastructure related to the Severn Edge fusion proposal.
- 3.30 Stroud District Council acknowledges the need for the Stroud District Local Plan to set out clearly the necessary infrastructure required for each strategic development and how it will be delivered, together with clarity on the transport assessment work and travel plans required from developers.
- 3.31 The parties agree to work together and with National Highways and developers to determine appropriate infrastructure at M5 Junction 14 and associated roads, safeguard land to enable the intervention, detail the triggers and timing for interventions, and devise a funding and delivery strategy for identified improvements.
- 3.32 The parties agree to work together between October 2021 and the Stroud District Local Plan hearing sessions in 2022, with the aim of resolving the outstanding matters raised by South Gloucestershire Council by agreeing appropriate modifications to the Stroud District Local Plan where necessary.
- 3.33 The parties agree to work together to develop any further transport evidence required to accompany the Stroud District Local Plan during examination.
- 3.34 The parties agree to work together to implement the transport policies contained within the Stroud District Local Plan (2020 to 2040), where relevant, when adopted.
- 3.35 The parties agree to engage proactively and positively on ongoing strategic planning and transport matters relating to the Stroud District Local Plan and the emerging WECA SDS and SGLP.

#### **4. Matters that are not agreed**

- 4.1 South Gloucestershire Council has raised concerns regarding the wording contained within the Stroud District Local Plan on transport grounds set out within the Council’s Reg.19 representation. Whilst South Gloucestershire Council has put forward recommendations to resolve these matters, and Stroud District Council wishes to resolve these matters through agreeing appropriate modifications through the examination process where necessary, the matters remain unresolved at the current time.

**5. Signatories**

Signed on behalf of South Gloucestershire Council

Handwritten signature of Paul Conroy in black ink.

Signed on behalf of Stroud District Council  
Mark Russell Head of Planning Strategy and Economic Development

Handwritten signature of Mark Russell in grey ink.

.....  
Dated

20 October 2021 .....

**Stroud District Local Plan (2020-2040)**  
**STRATEGIC TRANSPORT MATTERS STATEMENT OF COMMON GROUND**

**between**

**National Highways**  
**Stroud District Council**

**October 2021**

**1. Introduction and background**

- 1.1 This Statement of Common Ground (SoCG) covering strategic transport matters has been prepared at the submission of the Stroud District Local Plan (2020-2040), and has been signed by Stroud District Council and National Highways (formerly Highways England), referred to hereafter as ‘the parties’.

**2. Strategic matters that are agreed**

***Context and actions taken to date***

- 2.2 The National Planning Policy Framework requires transport issues to be considered from the earliest stages of plan-making. The planning system should actively manage patterns of growth to realise opportunities from existing and proposed transport infrastructure, to promote walking, cycling and public transport and to address impacts on transport networks and the environmental impacts of traffic and transport infrastructure. “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes (NPPF, para. 104-105).
- 2.3 Transport assessment work on the Stroud District Local Plan has been carried out at a number of key stages in the plan making process and has involved partnership working with transport and planning authorities and key stakeholders. The principal transport evidence includes:
- Strategy Options Transport Discussion Paper (July 2018)
  - Sustainable Transport Strategy (February 2021)
  - Traffic Forecasting Report (TFR) (March 2021)
  - Infrastructure Delivery Plan (IDP) (May 2021)
- 2.4 The principal duty to co-operate issue relates to working in partnership with transport and planning authorities and National Highways to ensure that the transport network can accommodate the required housing and employment growth levels for Stroud District (and unmet needs arising from Gloucester City) in a sustainable manner which limits the need to travel, supports a choice of transport modes, makes the most of the existing strategic transport network and delivers mitigation where required.
- 2.5 National Highways is responsible for the safe and efficient operation of the Strategic Road Network (SRN). Particular SRN matters relate to existing and future capacity and safety issues on the M5, notably M5 Junction 12 (Gloucester fringe), M5 Junction 13 (Stonehouse/Stroud), and M5 Junction 14 (located within South Gloucestershire).

- 2.6 A Stroud District Local Plan Transport Group was set up in 2017 to progress partnership working on the Stroud District Local Plan transport matters. A core group of Stroud District, Gloucestershire County Council and National Highways met regularly during the plan making process to develop the above studies and to discuss key issues and potential mitigation measures. South Gloucestershire Council was invited periodically to input into the assessment work and to discuss key issues and potential mitigation measures, especially relating to impacts on and mitigation measures for M5 Junction 14.
- 2.7 As part of their ongoing cooperation, National Highways and Stroud District Council regularly liaise on and review the location and scale of planned development to ensure that understanding of likely traffic impacts on the SRN, in particular M5 junctions 12 and 14, is kept up-to-date to assist with the assessment of development proposals.
- 2.8 National Highways, South Gloucestershire Council, Gloucestershire County Council and Stroud District Council have also met with a Developer Group consisting of promoters of housing growth proposals in South Gloucestershire (and latterly Stroud District) regularly since 2017 to discuss planned growth in the vicinity of M5 Junction 14 and potential mitigation measures.
- 2.9 The parties agree that they have co-operated on developing a transport evidence base throughout the preparation of the Stroud District Local Plan.
- 2.10 The parties agree that early consideration of transport matters fed into the development of the Stroud District Local Plan development strategy.
- 2.11 The parties agree with the broad findings of the Strategy Options Transport Discussion Paper (2018) and in particular that a development strategy based upon a concentrated growth option is a more sustainable option than a dispersed growth option.
- 2.12 National Highways accepts the TFR (2021) assessment methodology and findings.
- 2.13 National Highways in its Reg.19 representations to the Stroud District Local Plan has welcomed the identification of necessary improvements to SRN junctions as set out within the TFR and IDP.
- 2.14 In summary, the parties agree that Stroud District Council, in preparing the Stroud District Local Plan (2020-2040), has engaged proactively and positively with National Highways on strategic transport matters through the Duty to Cooperate.

***Commitments for future work and collaboration***

- 2.15 National Highways has requested in its Reg.19 representations to the Stroud District Local Plan that the need for the necessary infrastructure should be set out more explicitly in both individual allocation policies where necessary and in an over-arching infrastructure policy. This would provide a clear policy linkage between the Infrastructure Delivery Plan and the Local Plan, and provide assurance that the authority is committed to bringing the necessary infrastructure forward in line with the proposed growth aspirations. National Highways requests that the requirement for strategic development sites to be supported by a transport assessment and travel plan should also be clearly signposted in the relevant site allocation policy.

- 2.16 Stroud District Council acknowledges the need for the Stroud District Local Plan to set out clearly the necessary infrastructure required and provide a policy basis to secure it. The Council also agrees that there should be clarity on the transport assessment work and travel plans required from developers.
- 2.17 The parties agree to work together through the examination process to resolve the outstanding matters raised by National Highways by agreeing appropriate modifications to the Plan where necessary.
- 2.18 The parties agree to engaged proactively and positively on ongoing strategic transport matters relating to the Stroud District Local Plan.
- 2.19 The parties agree to work together where possible to develop any further transport evidence required to accompany the Stroud District Local Plan during examination.
- 2.20 The parties agree to work together and with South Gloucestershire Council, Gloucestershire County Council and developers, to determine appropriate infrastructure at M5 junctions 12, 13 and 14, safeguard land to enable the intervention, detail the triggers and timing for interventions, and devise a funding and delivery strategy for identified improvements.
- 2.21 The parties agree to work together to implement the transport policies contained within the Stroud District Local Plan (2020 to 2040) when adopted.
- 2.22 The parties agree to continue to ensure they engage from the outset of new development proposals, and throughout the pre-application process, to ensure that development proposals likely to impact on the SRN present a robust transport evidence base.

**3. Matters that are not agreed**

- 3.1 National Highways has raised concerns regarding the wording of various policies and site allocations on transport grounds set out within their Reg.19 representation. Whilst National Highways has put forward recommendations to resolve these matters, and Stroud District Council wishes to resolve these matters through agreeing appropriate modifications through the examination process where necessary, the matters remain unresolved at the current time.

**4. Signatories**

Lisa McCaffrey  
Signed on behalf of National Highways



.....  
Mark Russell Head of Planning Strategy and Economic Development  
Signed on behalf of Stroud District Council

*M.L. Russell*

.....  
Dated  
06/10/2021 .....

**Stroud District Local Plan (2020-2040)**  
**ENVIRONMENT AGENCY STATEMENT OF COMMON GROUND**

**between**

**Stroud District Council**  
**Environment Agency**  
**October 2021**

**1. Introduction and background**

- 1.1 A Statement of Common Ground (SoCG) covering agreements on various water related planning matters has been prepared by Stroud District & the Environment Agency at the submission of the Stroud District Local Plan (2020-2040), and has been signed by Environment Agency (EA) and Stroud District Council (SDC), referred to hereafter as ‘the parties’.
- 1.2 The purpose of the SoCG is to set out as at October 2021 areas of agreement between the authorities in respect of how strategic water related issues have been addressed through the preparation of the Stroud District Local Plan.

**2. Matters that are agreed**

***Context and actions taken to date***

- 2.1 The National Planning Policy Framework (2021) seeks to avoid inappropriate development in areas at risk of flooding by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, this should be subject to a Sequential Test and the development should be made safe for its lifetime without increasing flood risk elsewhere. Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities. (NPPF, para. 159-160).
- 2.2 In Autumn 2018 Stroud District Council commissioned JBA Consulting Ltd to undertake a Strategic Flood Risk Assessment (SFRA). The Level 2 assessment considered site options identified for potential allocation within the emerging Stroud Local Plan. The JBA work builds upon the Level 1 SFRA (2008) and Level 2 SFRA (2012 - 2014) for Stroud by providing updated information on surface water management and Sustainable Drainage Systems (SuDS), guidance for site-specific Flood Risk Assessments (FRAs) and opportunities to reduce flood risk to existing communities within the district of Stroud.
- 2.2 From Autumn 2018 JBA Consulting worked with the Environment Agency in evidence gathering and agreeing the methodology of the work. It is important to remember that information on flood risk is being updated continuously, when new information on flood risk, flood warnings or new planning guidance and legislation becomes available. The information was provided by Stroud District Council, Gloucestershire County Council (the lead local flood authority (LLFA)), the Environment Agency, Lower Severn Internal Drainage Board,, and/or the water companies. It was recognised that as the District Council moves forward with its Local Plan, they must use the most up to date information in the Sequential Test, and

developers should be aware of the latest information for use in Flood Risk Assessments. Hence in November 2019 a draft iteration of the SFRA Level 2 accompanied that consultation stage “Draft Plan for Consultation” as part of the evidence base. All comments related to the SFRA Level 2 were passed to JBA Consulting to consider and where necessary update the SFRA Level 2. Further SFRA Level 2 evidence was produced in 2020 to accompany the Additional Housing Options consultation and again all comments were passed to JBA Consulting related to this work. In May 2021 the Council published as part of the evidence base the draft Final SFRA Level 2 which was then to accompany the Regulation 19 stage Local Plan. Thus the SFRA has been subject to regular consultation and produced in an iterative and ongoing co-operative manner. Dialogue continues with the Environment Agency.

- 2.3 The Council also works with the Gloucestershire Severn Estuary Stakeholders (Glos SES) which was formed in 2011 to promote information exchange and partnership working between all stakeholders with an interest in water and flood risk management issues relating to land and settlements from the first Severn Crossing to the north side of Gloucester City. The group regularly has officers from the Environment Agency attending.
- 2.4 Stroud District has engaged with the Environment Agency throughout the Local Plan process, recognising the benefits that this co-operation brought for the last Local Plan adopted in November 2015. This has included discussion as part of wider groups operating within the District particularly along the Severn Estuary and its tributaries. Examples of such groups are listed in the Duty to Co-operate statement and include the Local Nature Partnership (LNP) Severn Estuary Partnership (SEP), Severn Estuary Coastal Group (SECG), Association of Severn Estuary Relevant Authorities (ASERA) and Gloucestershire Severn Estuary Stakeholders (Glos SES). The Severn Estuary Coastal Group (SECG) for example works to promote sustainable shoreline management, and to facilitate the duties and responsibilities of local authorities and other organisations managing coastal protection and flood defence issues around the Severn Estuary. The group are working with Environment Agency consultants on the Shoreline Management Plan Review. SMPs provide important information for planners and regulators to plan for and manage the way that the shoreline changes over time. The SMP can help Local Authority planning departments to understand the risks in coastal areas and take those risks into consideration when developing Local Plans and making development control decisions.
- 2.5 Since 2016 a range of meetings have taken place with Natural England, Footprint Ecology and the Environment Agency (West Midlands and Wessex Area teams) to discuss issues around potential development allocation at Sharpness and any potential impacts on the natural environment. Some of these meetings were specifically with the Sharpness site promoters and their agents to discuss specific impacts and proposed mitigation. There were a range of interrelated matters such as visitor pressure, flood defence, drainage, coastal squeeze and wildlife interests discussed.
- 2.6 The District Council recognises there have been both resource and financial implications engaging in discussions on the progress of the Local Plan Submission document outside the Local Plan formal consultation periods, in accordance with EA policy. The impact of the Coronavirus pandemic has also restricted the potential for meetings or discussion. Both parties have continued their discussions on water related matters wherever possible. This has resulted in the Environment Agency commenting that:

*“There is much within the PSD that we consider to be of a high standard and quality. For example, we particularly welcome and support the focus throughout the PSD on climate change”*

***Commitments for future work and collaboration***

- 2.7 In respect of **Evidence Base Level 2 SFRA** the Council is pleased to confirm that JBA Consulting have updated references to the 2021 NPPF in the SFRA. The July 2021 climate change allowances have been added, as raised by the Environment Agency in their regulation 19 consultation response. The Environment Agency have been formally approached for undertake a final review under the EACost Recovery Review service. The comments made by the EA in their consultation response (on referencing the latest climate change allowances) as well as the NPPF updates in the SFRA Level 2 are being incorporated into the SFRA Level 2. The parties agree to work together to resolve the SFRA Level 2 matters. The District Council welcomes and notes that the changes do not *“call into question any of the **site allocations** in the PSD; neither do we consider the changes necessitate any alteration to policy wording in the PSD.”* The District Council welcomes that the EA have *“no objections to the Plan in relation to the Sharpness New Settlement allocation.”*
- 2.8 The EA have recommended suggested changes to **Delivery Policy ES4** wording in respect of flooding and flood risk from all sources. There is the need for the Stroud District Local Plan to reflect the recent July 2021 NPPF changes. Both parties are committed to working together to resolve this soundness matter and will continue dialogue accordingly.
- 2.9 The District Council notes the EA statement on **Groundwater and Contaminated Land** made previously in January 2020. Land contamination can adversely affect or restrict the beneficial use of land. However, in many instances consideration of land contamination and controlled waters (i.e. ground and surface water) at the planning application stage is too late. Groundwater in particular needs an area wide holistic approach when considering such a valuable resource and the EA believe is much more effective at strategic ‘design’ stage. Local Plans have a key role to play in facilitating the improvement of land affected by contamination. ‘The Model Procedures for the Management of Land Contamination (CLR 11) were withdrawn on 8<sup>th</sup> October 2020 and have now been replaced by Land contamination risk management (LCRM) advice (last updated on 19.4.21). The assessment is used to evaluate the potential for a pollution linkage and consider whether actions are required to manage or mitigate the risk. Both parties agree to work together to resolve this issue and will continue dialogue accordingly.
- 2.10 The District Council notes the EA comment on **Evidence Base – Infrastructure Delivery Plan (IDP) - Waste Water Infrastructure**. Both parties agree to work together to resolve this issue and will continue dialogue accordingly working with SDC consultant ARUP on IDP matters. The Council welcomed the EA commentary *“Clearly consultation has taken place with the relevant water companies, as per our previous advice, and this is welcomed.”* Both parties acknowledge the principle that new development should not be allocated in areas that are not currently served by mains foul drainage, unless it is intended to provide new mains drainage in the area prior to development coming forwards. Both parties agree to review the IDP findings on wastewater constraint matters.. The parties agree to work



together through the examination process to resolve the outstanding matters by agreeing appropriate modifications to the Plan where necessary.

- 2.11 The District Council notes the EA comment on **Water Resources – “Serious Water Stress”**. Both parties are committed to working together to resolve this soundness matter and will continue dialogue accordingly to address this soundness issue of water usage.
- 2.12 In respect of **Sequential Test and Settlements** the Council notes the EA commentary that they have experienced difficulties at the development management stage with inappropriate windfall development being promoted in areas that are at extensive flood risk from the River Severn (e.g. such as Saul, Epney and Arlingham). and they wish there should be more robust, prescriptive or bespoke advice on what type of development is and isn't appropriate in these locations. Both parties are committed to working together to resolve this matter and will continue dialogue accordingly.
- 2.13 The parties agree that Stroud District Council, in preparing the Stroud District Local Plan (2020-2040), has engaged proactively and positively with the Environment Agency on water, air and land use related planning matters through the Duty to Cooperate.

**3. Matters that are not agreed**

3.1 There are none.

**4. Signatories**

Signed on behalf of the Environment Agency



**Ruth Clare, Planning Specialist, Sustainable Places, West Midlands Area**

Signed on behalf of Stroud District Council  
Mark Russell Head of Planning Strategy and Economic Development



Dated

13 October 2021.....

**Stroud District Local Plan (2020-2040)**  
**NATURAL ENVIRONMENT MATTERS STATEMENT OF COMMON GROUND**

**between**

**Natural England**  
**Stroud District Council**

**October 2021**

**1. Introduction and background**

- 1.1 This Statement of Common Ground (SoCG) covering strategic allocations, planning and biodiversity matters has been prepared at the submission of the Stroud District Local Plan (2020-2040), and has been signed by Natural England and Stroud District Council, referred to hereafter as ‘the parties’.
- 1.2 The purpose of the SoCG is to set out as at October 2021 areas of agreement between Natural England in respect of how strategic Habitats Regulations Assessment, biodiversity/geodiversity, landscape/natural features, soils, green infrastructure, climate change & soil policy matters have been addressed through the preparation of the Stroud District Local Plan.

**2. Context and actions taken to date**

- 2.1 The National Planning Policy Framework (2021) requires that plans should both protect and enhance biodiversity and geodiversity by safeguarding components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation. Plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. Officers of the Council have worked with Natural England directly and also joint working with a range of bodies and organisations involved with the natural environment.
- 2.2 The Council closely works with the Gloucestershire Local Nature Partnership (GLNP). The partnership came into being in response to the Government’s 2011 Natural Environment White Paper, [The Natural Choice: Securing the Value of Nature](#), along with 47 other LNPs in England. The GLNP is formed of over 30 organisations from public, private and third sector bodies from across the county, all working together to recognise the importance of embedding nature's value in local decisions for the benefit of nature, people and the economy. The District Council sits on the Board of the partnership to assist providing a strong and innovative voice for the environment sector and Local Nature Partnerships are seen by Defra as the key body in the local delivery of the [Government's 25 Year Environment Plan](#).
- 2.3 The Local Authority Planning and Biodiversity Group is a standalone group of officers from each of the local planning authorities in Gloucestershire plus representatives from Natural England and the local Wildlife Trust. In general, it aims to determine how local authorities

can help to protect and enhance biodiversity whilst carrying out their functions or delivering services. It is valued by its members for sharing experiences, having productive discussions, solving problems and agreeing partnership working. It is actively involved in improving the information available to local authorities and held by the Gloucestershire Centre for Environmental Records (GCER) on the natural environment. This covers important ecological and green networks, designated sites, habitats and species data. Best practice and guidance is shared by the Group. The Group has strong links with the work of the Gloucestershire Local Nature Partnership (Glos LNP) but is not a part of it. GCER is a not-for-profit Local Records Centre which collects, collates, manages and disseminates information of known quality relating to biological & geological sites, ecosystem services, wildlife and habitats of Gloucestershire for the public benefit. The District Council has a Service Level Agreement (SLA) with GCER to access this data and also a programme of review of the condition of sites as necessary.

- 2.4 The Council undertakes the administration and allocation of funding for the current adopted mitigation strategies for Rodborough Common and the Severn Estuary. Specialist advisors from a range of interested organisations sit on Conservation Panels (Rodborough Common and Severn Estuary) including Natural England representatives that exchange information, assist the Council identifying projects and priorities (that comply with the identified projects in the respective adopted mitigation strategies).

### **Matters that are agreed**

- 3.1 The matters that have been relevant to Natural England and agreed during the preparation of the Stroud District Local Plan have been:
- Strategic Allocation Policy PS34 Sharpness Docks. Natural England notes and agrees with the HRA report conclusions regarding this allocation and welcome the suite of mitigation measures described as part of the requirements for the development at paragraph 3.5.11 of the Regulation 19 local plan.
  - Strategic Allocation Policy PS36 Sharpness new settlement. Natural England notes and agrees with the HRA report conclusions regarding this allocation (para 9.7 included below for reference) and welcome the suite of mitigation measures described as part of the requirements for the development at paragraph 3.5.22 of the Regulation 19 local plan.
  - Delivery Policy DHC5 Wellbeing & healthy communities is welcomed by Natural England. The emerging 'social prescribing' theme is noteworthy in relation to this policy.
  - DHC6 – Protection of existing open spaces and built and indoor sports facilities & DHC7 – Provision of new open space and built and indoor sports facilities. Natural England welcome these new policies and notes paragraph 4.89.
  - Delivery Policy ES3 Maintaining quality of life within our environmental limits. Natural England notes the policy's inclusion of the 'best and most and versatile' land theme. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process.
  - Delivery Policy ES5 - Air quality. Natural England welcomes this policy and note and agree with the HRA report conclusions ruling out adverse effects on the integrity of

the Cotswold Beechwoods Special Area of Conservation (SAC) alone and in combination with other plans and projects.

- Delivery Policy ES8 - Trees, hedgerows and woodlands. Natural England welcome this policy for the important role it has in supporting the protection, management and delivery of these resources as well as welcome reference to the Gloucestershire Local Nature Partnership Tree Strategy.
- Delivery Policy DES2 – Green Infrastructure. Natural England welcome this policy for the important role it has in supporting the protection, management, creation and delivery of this multifunctional resource. Multifunctional green infrastructure (including blue infrastructure) serves to link and buffer habitats and species from the landscape scale right up to people’s doorsteps and, as a result, providing people with opportunities for contact with nature, with positive benefits for both physical and mental well-being.

### ***Commitments for future work and collaboration***

- 3.2 Currently Stroud District Council, working with other Gloucestershire LPAs, are identifying a review of Severn Estuary visitor pressures, with potential to jointly produce a visitor survey and a future mitigation strategy. Natural England are working with the relevant LPAs and using Stroud District’s experience and expertise. In addition to this, the joint commissioning of work to produce a Cotswolds Beechwoods Recreation & Mitigation Strategy is now well advanced and involves closely working with Natural England and the Districts.
- 3.3 Delivery Policy ES2 Renewable or low carbon energy generation (**AONB aspects**). Natural England believe that the assessment methodology and resulting ‘suitable areas’ mapping (Appx 8b) has not taken account of relevant Cotswolds AONB references e.g. Cotswolds AONB Management Plan (2018-23), AONB Landscape Character Assessment and AONB Landscape Strategy and Guidelines. Both parties are committed to working together to resolve this soundness matter and will continue dialogue accordingly.
- 3.4 Delivery Policy ES2 Renewable or low carbon energy generation (**HRA aspects**). Both parties acknowledge the important role that this policy has in allowing the Council to pursue their net zero carbon by 2030 ambition. Currently however the local plan HRA report omits reference to the scope for adverse effects from renewable energy generation (without mitigation) on International and European (or Habitats) Sites. The parties agree that this omission should be addressed in the HRA report in order to acknowledge the potential for this type of development to have ecological impacts on European Sites and their species. Both parties are in dialogue and there should be formal agreement by the time of examination.
- 3.5 Delivery Policy ES6 – Providing for biodiversity and geodiversity. Natural England welcome the policy and recommend some text to both strengthen it and link it more closely with the HRA findings and recommendations. The parties agree to work together through the examination process to resolve the outstanding matters by agreeing appropriate modifications to the Plan where necessary.
- 3.6 The parties agree that Stroud District Council, in preparing the Stroud District Local Plan (2020-2040), has engaged proactively and positively with Natural England on environmental planning matters through the Duty to Cooperate.

**4. Matters that are not agreed**

4.1 There are none.

**5. Signatories**

Signed on behalf of Natural England



Hayley Fleming - Senior Adviser

.....

Signed on behalf of Stroud District Council

Mark Russell Head of Planning Strategy and Economic Development



.....

Dated

13 October 2021.....

**Stroud District Local Plan (2020-2040)**  
**HISTORIC ENGLAND STATEMENT OF COMMON GROUND**

**between**

**Stroud District Council**  
**Historic England**  
**October 2021**

**1. Introduction and background**

- 1.1 A Statement of Common Ground (SoCG) covering agreements on various planning matters has been prepared by Stroud District Council & Historic England.
- 1.2 This Statement of Common Ground (SoCG) covering heritage matters has been prepared at the submission of the Stroud District Local Plan (2020-2040), and has been signed by Stroud District Council and Historic England, referred to hereafter as ‘the parties’.

**2. Matters that are agreed**

***Context and actions taken to date***

- 2.1 Section 110 of the 2011 Localism Act inserted the Duty to Co-operate as a new Section 33A into the Planning and Compulsory Purchase Act 2004. The duty requires local planning authorities, county councils and prescribed bodies to co-operate effectively with each other when preparing development plan documents, local development documents, marine plans and when undertaking activities that prepare the way for the preparation of, or support the preparation of, the above documents.
- 2.2 Historic England (formerly English Heritage) are a prescribed body under the Duty to Cooperate and are the responsible body for heritage matters. Para 190 of the NPPF requires that Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.
- 2.3 In order to comply with the Duty to Cooperate and the NPPF, Stroud District Council has engaged with Historic England throughout the Local Plan process, recognising the benefits that this co-operation brought for the last Local Plan adopted in November 2015.
- 2.4 In preparing the Local Plan, as well as through ongoing collaborative working, Stroud District Council has consulted Historic England on five formal consultation periods as set out below:

Issues and options	Autumn 2017
Emerging strategy	Autumn 2018
Final draft plan	Autumn 2019
Additional housing options	Autumn 2020
Pre-Submission	Spring 2021

- 2.5 Throughout this process Historic England have engaged and responded to all Stroud District Council public consultations and liaised with Officers as the Plan has developed. This has helped inform the preparation of the Local Plan and the evidence base so that the Local Plan has worked towards addressing the requirements both of the Duty to cooperate and the requirements of the NPPF on heritage matters.
- 2.6 The parties agree that Stroud District Council, in preparing the Stroud District Local Plan (2020-2040), has engaged proactively and positively with the Historic England relating to heritage and planning matters through the Duty to Cooperate.

***Commitments for future work and collaboration***

- 2.7 Historic England responded to the Stroud District Council Regulation 19 consultation setting out that:

*‘Although there is much to commend, we do have several comments in relation to the soundness and legal compliance of the Plan. We do however hope that further clarification, discrete additional evidence and relatively modest associated changes may be able to satisfactorily address these matters.’*

- 2.8 The parties agree to work together and commit to investigating further discrete evidence where appropriate and to work together through the examination process to resolve the outstanding matters by agreeing appropriate modifications to the Local Plan where necessary.

**3. Matters that are not agreed**

- 3.1 The issues outlined in 2.7 are not yet resolved, both parties will resolve these matters through agreeing appropriate modifications through the examination process where necessary.

**4. Signatories**

Signed on behalf of Historic England

.....Rohan Torkildsen\*.....

Signed on behalf of Stroud District Council  
Mark Russell Head of Planning Strategy and Economic Development



.....

Dated

21 October 2021

\* Please note Historic England only provide electronic signatures for publication documents.





Stroud District Council  
Ebley Mill  
Stroud  
Gloucestershire  
GL5 4UB

The Planning Strategy Team  
local.plan@stroud.gov.uk

visit [www.stroud.gov.uk/localplanreview](http://www.stroud.gov.uk/localplanreview)

