

MEMORANDUM

To:	Mark Russell – Stroud District Council
Date:	01 st February 2023
GCC (internal) Ref:	PR2022/0241/1/LP
Subject:	Stroud District Council Local Plan Examination: Hearing Programme and Matters, Issues & Questions Potential Modifications put forward by SDC

Below is a schedule setting out recommendations made by GCC M&W Policy officers in respect of a suite of draft potential modifications, which Stroud District Council are looking to present to the examination of the Stroud District Local Plan Review.

The schedule also includes the background consideration by GCC of the matters raised within the modifications. These derive from the representations made by officers of the County Council regarding the ‘soundness’ of the draft version of the Stroud District Local Plan Review. The draft plan underwent ‘Regulation 19 stage’ public consultation in spring / summer 2021.

In summary, GCC M&W Policy officers support all of the draft potential modifications that are to put forward for consideration at the examination of the Stroud District Local Plan Review. Officers recommend the changes to the Stroud District Local Plan Review, as the means of fully resolving the previous concerns raised over the draft plan’s soundness.

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Potential Modifications put forward by SDC	Relevant GCC officer representations (June 2021)	M&W Policy officer recommendations for the Potential Modifications (Jan 2023)
<p>Core Policy CP11 and supporting text Paragraph 5.2</p> <p>5.2 The Council promotes and supports job growth in the District not only through provision of opportunities in the traditional employment land use categories of business use, general industrial use and storage/distribution use and “Sui Generis” industrial uses, but also in waste management, tourism, retailing, health care, education and leisure facilities. These are significant employment generators and are important to the functioning of the District’s economy.</p>	<p><i>...officers of the MWPA would support Core Policy CP11 going forward if a modification was made either through an additional bullet point; or slightly expanded text to bullet points 5 or 6; and / or a revision to the supporting text under paragraph 5.2.</i></p> <p><i>Confirmation is required that future proposals for waste management-related infrastructure might reasonably be considered alongside traditional employment land use categories of business use, general industrial use and storage / distribution use and “Sui Generis” industrial uses, tourism, retailing, health care, education and leisure facilities.</i></p>	<p>It is recommended that the potential modification to paragraph 5.2 related to Core Policy CP11 is supported by GCC</p>
<p>Delivery Policy EI2 and supporting text Paragraph 5.24</p> <p>Mixed-use redevelopment will be expected to provide important community and/or regeneration benefits and avoid adverse impacts on adjoining uses, such as locating incompatible land uses adjacent to well established employment uses or waste management sites thereby prejudicing their efficient operation. The development should aim to provide at least the same employment opportunities as existed when the employment space was previously used, subject to viability and site specific circumstances. In circumstances of site vacancy over a long time period, an employment densities guide shall be used as a basis to model traffic generation related to the last authorised employment use. An appropriate model shall be agreed with the Council.</p>	<p><i>‘...officers of the MWPA would support to Delivery Policy EI2 going forward if a modification was made (mostly obviously to the supporting text under paragraph 5.24). The modification should clearly articulate that regenerative development at existing employment sites would need to ensure that potential adverse impacts on existing waste management facilities, permitted sites, and areas allocated for future waste management-related uses would not occur. Regenerative development that could generate incompatible land-uses should be avoided or accompanied by sufficient mitigation that will prevent prejudicing the efficient operations of waste management-related facilities and their ability to effectively implement the waste hierarchy.</i></p>	<p>It is recommended that the potential modification to paragraph 5.24 related to Delivery Policy EI2 is supported by GCC</p>



<p>Delivery Policy EI2a and supporting text</p> <p>Paragraph 5.27</p> <p>5.27 The de-licensed site, which includes office and laboratory accommodation, is now subject to ongoing re-use and redevelopment as the Gloucestershire Science and Technology Park. The Park will include a range of educational, training and research facilities related to the renewable energy, engineering, digital technologies, advanced manufacturing and nuclear sectors with room for expansion. Proposals for continued office, B2 and B8 uses, waste management and ancillary uses, or those associated with the Science and Technology Park (including forms of renewable and low carbon energy generation) will be supported.</p>	<p><i>'...officers of the MWPA would support policy EI2a going forward if a modification was made to the supporting text under paragraph 5.27. Waste management-related infrastructure should be added to the list of employment uses that may be supported.'</i></p>	<p>It is recommended that the potential modification to paragraph 5.27 related to Delivery Policy EI2a is supported by GCC</p>
<p>Delivery Policy EI5 and supporting text</p> <p>Paragraph 5.30</p> <p>5.30 National policy promotes the development and diversification of agricultural and other land-based rural businesses. Diversification can be described as any proposal which seeks to supplement farm income on working farms. These are usually categorised into E(g), B2& B8 employment uses, waste management, tourism, services, sport and recreation and other employment uses appropriate to a rural area. The conversion of disused farm buildings for tourism accommodation can usually be supported; whilst sport and recreation projects that do not have an adverse impact on the landscape or biodiversity can be encouraged, subject to adequate safeguards.</p>	<p><i>'...officers of the MWPA would support Delivery Policy EI5 going forward if a modification was made to the third sentence of paragraph 5.30. Waste management-related infrastructure should be added to the list of potential uses identified.'</i></p>	<p>It is recommended that the potential modification to paragraph 5.30 related to Delivery Policy EI5 is supported by GCC</p>





<p>Strategic Site Allocation Policy PS34 - Sharpness Docks</p> <p>Page 169</p> <p>The principal physical constraint is the tidal floodplain to the west and southwest of the settlement.</p> <p>There is safeguarded minerals and waste infrastructure at Sharpness Docks.</p> <p>The Conservation Area covers the Sharpness Old Dock and Sharpness canal to the north.</p> <p>There are a few listed buildings within the Docks and within the surrounding rural area.</p> <p>The Severn Estuary to the west is a SAC/SPA/RAMSAR site.</p> <p>The Sharpness Docks Key Wildlife Site lies between Sharpness Docks and Newtown.</p> <p>There are protected open spaces within the Settlement.</p>	<p><i>'...officers of the MWPA would support Strategic Site Allocation Policy PS34 going forward if modifications were made. The 'Planning constraints and designations' set out on page 169 should include the presence of minerals and waste infrastructure and the need to ensure their efficient and effective operations will not be compromised by new development. This constraint should also be accommodated in the main policy text – under part a. A requirement should be added that will ensure future dock uses and dock-related industrial and distribution uses will not prejudice the efficient and effective operations of safeguarded minerals and waste infrastructure.'</i></p>	<p>It is recommended that the potential modification to the planning constraints on page 169 related to Strategic Site Allocation Policy PS34 is supported by GCC</p>
<p>Strategic Site Allocation Policy PS34 Sharpness Docks</p> <p>At end of policy:</p> <p>The disused rail line will be protected, should it prove feasible to reinstate the Docks rail link.</p> <p>Future dock uses and dock-related industrial and distribution uses will not prejudice the efficient and effective operations of safeguarded minerals and waste infrastructure.</p> <p>Planning applications for Sharpness Docks must ensure no adverse effect will occur on the integrity of the Severn Estuary SAC/SPA/Ramsar site, otherwise planning permission will not be granted.</p>	<p><i>'...officers of the MWPA would support Strategic Site Allocation Policy PS34 going forward if modifications were made. The 'Planning constraints and designations' set out on page 169 should include the presence of minerals and waste infrastructure and the need to ensure their efficient and effective operations will not be compromised by new development. This constraint should also be accommodated in the main policy text – under part a. A requirement should be added that will ensure future dock uses and dock-related industrial and distribution uses will not prejudice the efficient and effective operations of safeguarded minerals and waste infrastructure.'</i></p>	<p>It is recommended that the potential modification to Strategic Site Allocation Policy PS34 is supported by GCC</p>





Strategic Site Allocation Policy G2 - Land at Whaddon

Page 155

Whaddon is not identified in the Local Plan as a Tier 1-4 settlement and it has no settlement development limits: the Local Plan treats the area as “countryside”.

Brookthorpe (a Tier 4b settlement) lies south of the M5 motorway. Gloucester is the nearest higher order settlement and it provides both strategic and local facilities.

The Cotswolds AONB lies beyond the M5, to the south. The area was not included in the Stroud District **Landscape Sensitivity Assessment** (which focussed on land surrounding the District’s existing defined settlements), but it has been assessed through the 2019 **Assessment of Strategic Development Opportunities in Parts of Gloucestershire**, which compared the area’s landscape sensitivity against that of other locations around Gloucester.

There are listed buildings within Whaddon, immediately east of the site; and to the south, beyond the M5 at Brookthorpe.

The principal physical constraints affecting the land identified as **G2** are the floodplain (which runs through its centre) and the proximity of the M5 to the south and the Bristol-Birmingham main railway line to the west.

[The area includes a designated Mineral Safeguarding Area \(MSA\).](#)

Add a new bullet point to Policy G2:

[An initial Mineral Resource Assessment \(MRA\) to determine the significance of the underlying mineral resources present within the designated MSA and any mitigation measures necessary to avoid its sterilisation or strategy for its prior extraction](#)

‘...officers of the MWPA would support Strategic Site Allocation Policy G2 going forward if modifications were made. The ‘sensitivity, constraints and designations’ set out on page 155 should include the fact that part of the allocation falls within a designated Mineral Safeguarding Area (MSA). In addition, the text for Strategic Site Allocation Policy G2 should include a further bullet requiring any future development brief to...:- determine through an initial Mineral Resource Assessment (MRA), the significance of the underlying mineral resources present within the designated MSA and the extent to which any mitigation measures will be necessary to avoid sterilisation by surface development and / or whether a strategy for the prior extraction of the mineral will be required for any future development proposals covering the relevant area of allocation G2.’

It is recommended that the potential modifications to the planning constraints on page 155 and the policy text related to Strategic Site Allocation Policy G2 are supported by GCC





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

Page 105:

The principal physical constraint is the floodplain to the south of the town along the River Frome valley.

[The area includes designated Mineral Safeguarding Areas \(MSA\).](#)

The Industrial Heritage Conservation Area adjoins the southern edge of the town. There are a number of listed buildings within the town and on the rural boundaries.

The River Frome and the Verney Meadows

Key Wildlife Sites lie along the southern and eastern edges of the town respectively.

The Cotswolds AONB lies adjacent to the eastern and northern edge of the town. There are protected open spaces within the town.

Add a new bullet point to Policy PS20:

[An initial Mineral Resource Assessment \(MRA\) to determine the significance of the underlying mineral resources present within the designated MSAs and any mitigation measures necessary to avoid their sterilisation or strategy for their prior extraction;](#)

'...officers of the MWPA would support Strategic Site Allocation Policy PS20 going forward if modifications were made. The planning constraints and designations' set out on page 105 should include the fact that part of the allocation falls within designated Mineral Safeguarding Areas (MSAs). In addition, the text for Strategic Site Allocation Policy PS20 should include a further bullet requiring any future development brief to...:- determine through an initial Mineral Resource Assessment (MRA), the significance of the underlying mineral resources present within the designated MSAs and the extent to which any mitigation measures will be necessary to avoid sterilisation by surface development and / or whether a strategy for the prior extraction of the mineral will be required for any future development proposals covering the relevant areas of allocation PS20.'

It is recommended that the potential modifications to the planning constraints on page 105 and the policy text related to Strategic Site Allocation Policy PS20 are supported by GCC

