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# **Sustainability Appraisal Report for the Stroud District Local Plan Review – Pre-submission Draft Local Plan**

Prepared by LUC  
May 2021

**Project Title:** Sustainability Appraisal of the Stroud District Local Plan Review – Pre-submission Draft Local Plan

**Client:** Stroud District Council

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# 1 Introduction

- 1.1 This Sustainability Appraisal Report has been prepared by LUC on behalf of Stroud District Council as part of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Stroud District Local Plan Review.
- 1.2 This report relates to the Stroud District Local Plan Review – Pre-submission Draft Local Plan (May 2021) and it should be read in conjunction with that document.

## Context for the Stroud District Local Plan Review

- 1.3 Stroud District sits within the county of Gloucestershire. The District is approximately 45,325ha in size, taking up approximately 17.1% of the total area of Gloucestershire. It is mostly rural in character with 51.6% of the land classed as rural<sup>1</sup>. The population density in the most rural parts of the District is less than one person per hectare<sup>2</sup>.
- 1.4 The first tier settlements in the District are Stroud, Stonehouse and Cam and Dursley, as set out in the adopted Local Plan (and retained in the Local Plan Review). These settlements are located on the A419 and A4135 respectively – these roads provide relatively easy motorway access at the M5 which passes through the western part of the District. Approximately 22km of the Severn Estuary shoreline falls within the jurisdiction of Stroud District Council<sup>3</sup>.
- 1.5 The town of Stroud is positioned as the focal point of the 'Five Valleys' (Chalford Valley, Nailsworth Valley, Ruscombe Valley, Slad Valley and Painswick Valley)<sup>4</sup>, providing it with a dramatic landscape setting and connection with the wider countryside. Existing market towns and large villages of the District include Berkeley, Cam, Dursley, Minchinhampton, Nailsworth, Painswick, Stonehouse, and Wotton-Under-Edge.
- 1.6 Much of the land in the eastern portion of the District beyond the more sizeable settlements falls within the Cotswolds Area of Outstanding Natural Beauty (AONB) which has been designated in recognition of its rich, diverse and high quality landscape. Significant areas of land at the Severn Estuary have been designated as a Special Protection Area (SPA), a Special Area of Conservation (SAC) and a Ramsar site and these areas fall partly within the boundaries of the District to the south west. Additional important biodiversity sites in the District include Cotswold Commons and Beechwoods National Nature Reserve (NNR) and Cotswold Beechwoods SAC both of which are in close proximity to Painswick and Rodborough Common SAC immediately to the south of Stroud.
- 1.7 The Stroud Valleys were among the earliest cloth making areas in Britain. As such, factories and mills are present within the District from these times with surviving structures mainly centred on the town of Stroud. Following the decline of the textile industry in the District the factories and mills have mainly been used for other industrial purposes, or have been converted to alternative uses such as residential and office use<sup>5</sup>. Stroud District Council is currently based in Ebley Mill which is thought to have been present in Stroud town since 1393.
- 1.8 Given its historic past unsurprisingly the District is home to numerous heritage assets, many of which are located within the 41 Conservation Areas currently designated. The Industrial Heritage Conservation Area (IHCA) which covers the length of the Cotswold Canals for approximately 23km, is notable for being one of the largest conservation areas in Britain.

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<sup>1</sup> Defra (June 2011) *Local Authority Rural-Urban Classification*

<sup>2</sup> Gloucestershire County Council (October 2013) *Census Briefing for Commissioners*

<sup>3</sup> EPR for Stroud District Council *Severn Estuary (Stroud District) Visitor Survey Report*

<sup>4</sup> Stroud District Council (January 2009) *Public Realm Strategy: Stroud town centre*

<sup>5</sup> Local Development Framework: Scott Wilson for Stroud District Council (June 2009) *Local Development Framework: Sustainability Appraisal Scoping Report*

## The Local Plan Review

- 1.9 Stroud District Council adopted its current Local Plan in November 2015, which sets out the planning strategy for the District up to 2031. Although the plan was adopted relatively recently, an early review is being commenced in order to ensure that it remains up to date and can meet future needs for development over the 20 year period up to 2040.
- 1.10 An Issues and Options consultation for the Local Plan Review was published in October 2017 and a series of public consultation events were held during autumn 2017. These events were designed to gather feedback on key issues of particular concern in Stroud District today, the matters most likely to grow in importance over the next 20 years and options for addressing key issues and providing for future needs.
- 1.11 The Emerging Strategy Paper was published for consultation in winter 2018. The document set out the Council's emerging strategy for meeting development needs over the 20 year plan period. It also highlighted other options for this strategy and the potential policy approach the Council was considering taking to address the key priorities and needs of the District.
- 1.12 The Council published the Draft Plan for consultation between November 2019 and January 2020. The Draft Plan identified the housing, employment, retail and community development that is required to meet local needs up until 2040. It set out the strategy for distributing development within the District and policies for protecting and conserving the natural and built environment.
- 1.13 The Government published its proposed changes to the way the minimum housing requirement for each local authority area in the country is calculated in August 2020. Following this the Council undertook a further focussed consultation on an Additional Housing Options paper between October and December 2020. The Government's proposed changes would have resulted in an increase in the housing requirement for Stroud District from the level set out in the 2019 Draft Local Plan of 638 homes per annum, to 786 homes per annum. The Additional Housing Options paper consulted on the best strategy for identifying where additional housing should be accommodated, whether and where a reserve housing supply should be identified and the specific sites assessed to have potential to meet the additional housing need.
- 1.14 However, the Government subsequently decided not to proceed with the proposed changes to the standard method that were consulted on. The NPPF expects strategic policy-making authorities to follow the standard method in the PPG for assessing local housing need and this has been used to inform the identification of the housing need for the plan area. The Council has worked with adjoining authorities in Gloucestershire to prepare a Local Housing Needs Assessment that identifies the amount and types of housing that are likely to be needed during the plan period to 2040. The assessment confirms the Government's standard method for the Local Plan to provide for at least 630 new homes per year.
- 1.15 The Council has now updated the Local Plan drawing on the consultation responses to the Draft Plan and Additional Housing Options paper and updated evidence studies. The Pre-submission Draft Local Plan was considered by Full Council on 29<sup>th</sup> April 2021 and will subsequently be published for the formal Regulation 19 consultation period when consultees are asked to comment on the soundness of the plan, prior to its Submission to Government for Examination.

## Sustainability Appraisal and Strategic Environmental Assessment

- 1.16 Sustainability Appraisal is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.
- 1.17 Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive<sup>6</sup>, transposed in the UK by the SEA Regulations (Statutory Instrument 2004, No

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<sup>6</sup> SEA Directive 2001/42/EC

1633), as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (Statutory Instrument 2018, No 1232). As set out in the explanatory Memorandum accompanying the Brexit amendments<sup>7</sup>, they are necessary to ensure that the law functions correctly following the UK's exit from the EU. No substantive changes are being made by this instrument to the way the SEA regime operates. Therefore, the SEA regulations remain in force and it is a legal requirement for the Stroud Local Plan Review to be subject to SA and SEA throughout its preparation. Even following the UK's exit from the EU, most EU law continues to apply as a result of provisions in the European Union (Withdrawal) Act 2018 (EUWA).<sup>8</sup> As such the SA of the Stroud Local Plan will continue to fulfil a requirement of legal compliance as part of the plan making process. This SA Report includes EU plans and programmes as part of the context within which earlier stages of the Stroud Local Plan Review and SA process has been undertaken.

- 1.18 The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA)<sup>8</sup>. The purpose of SEA, as defined in Article 1 of the SEA Directive is *'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'*.
- 1.19 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. National Planning Practice Guidance<sup>9</sup> shows how it is possible to satisfy both requirements by undertaking a joint SA/SEA process, and to present an SA report that incorporates the requirements of the SEA Regulations. The SA/SEA of the Stroud District Local Plan Review is being undertaken using this integrated approach and throughout this report the abbreviation 'SA' should therefore be taken to refer to 'SA incorporating the requirements of SEA'.

### Meeting the requirements of the SEA Regulations

- 1.20 This report is the SA Report for the Stroud District Local Plan Review – Pre-submission Draft Local Plan (May 2021). **Table 1.1** below signposts how the requirements of the SEA Regulations have been met within this report.

**Table 1.1: Requirements of the SEA Regulations and where these have been addressed in this SA Report**

SEA Regulation Requirements	Where covered in this SA report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated (Reg. 12). The information to be given is (Schedule 2):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes	Chapters 1 and 3.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Chapter 3 and Appendix 2.
c) The environmental characteristics of areas likely to be significantly affected	Chapter 3 and Appendix 2.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Chapter 3 and Appendix 2.

<sup>7</sup> Explanatory Memorandum to the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 No. 1232

<sup>8</sup> Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.

<sup>9</sup> <http://planningguidance.planningportal.gov.uk/>

SEA Regulation Requirements	Where covered in this SA report
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation	Chapter 3.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)	Chapters 4, 5 and 6 and Appendices 3, 5, 6, 7 and 8.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapters 4, 5 and 6 and Appendices 3, 5, 6, 7 and 8.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 2 and Appendix 9.
i) a description of measures envisaged concerning monitoring in accordance with Reg. 17;	Chapter 7.
j) a non-technical summary of the information provided under the above headings	A separate non-technical summary document accompanies this Environmental Report.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3))	Addressed throughout this SA report.
<p><b>Consultation:</b></p> <ul style="list-style-type: none"> <li>authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5))</li> </ul>	Consultation on the SA Scoping Report was undertaken between April and June 2018.



SEA Regulation Requirements	Where covered in this SA report
<ul style="list-style-type: none"> <li>authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13)</li> </ul>	<p>Consultation was undertaken in relation to the Stroud District Local Plan Review: Emerging Strategy Paper between November 2018 and January 2019.</p> <p>Consultation was undertaken in relation to the Draft Local Plan between November 2019 and January 2020.</p> <p>Consultation is being undertaken in relation to the Pre-submission Draft Local Plan between 26th May and June 7th July 2021. The consultation document is accompanied by this SA report.</p>
<ul style="list-style-type: none"> <li>other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).</li> </ul>	N/A
<p><b>Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16)</b></p>	
<p><b>Provision of information on the decision:</b> When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>the plan or programme as adopted</li> <li>a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the consultation opinions expressed and the results of consultations entered into have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>the measures decided concerning monitoring</li> </ul>	<p>To be addressed after the Local Plan Review is adopted in a separate SEA/SA Adoption Statement. However, the reasons for selecting the sites included in the Emerging Strategy Paper, Draft Local Plan and Pre-submission Draft Local Plan are set out in Appendix 9.</p>
<p><b>Monitoring</b> of the significant environmental effects of the plan's or programme's implementation (Reg. 17)</p>	<p>To be addressed after the Local Plan Review is adopted.</p>
<p><b>Quality assurance:</b> environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.</p>	<p>This report has been produced in line with current guidance and good practice for SEA/SA and this table demonstrates where the requirements of the SEA Regulations have been met.</p>

### Structure of this report

1.21 This chapter has introduced the SA process for the Stroud District Local Plan Review. The remainder of the report is structured into the following sections:

- Chapter 2: Methodology** describes the approach that has been taken to the SA of the Local Plan Review, and provides an outline of the reasonable alternatives that have been considered at each stage in the plan preparation.
- Chapter 3: Sustainability Context for Development in Stroud** describes the relationship between the Stroud District Local Plan Review and other relevant plans, policies and

programmes; summarises the social, economic and environmental characteristics of the District and identifies the key sustainability issues.

- **Chapter 4: Sustainability Appraisal Findings for the Policies in the Pre-submission Draft Local Plan** summarises the SA findings for the policies that are included in the Pre-submission Draft Local Plan consultation.
- **Chapter 5: Sustainability Appraisal findings for the Pre-submission Draft Local Plan site allocations** summarises the SA findings for the site allocations that have been included in the Pre-submission Draft Local Plan.
- **Chapter 6: Cumulative effects for the Pre-submission Draft Local Plan** presents the cumulative SA findings for all policies and sites included by the Council as part of the Pre-submission Draft Local Plan.
- **Chapter 7: Monitoring** describes the approach that should be taken to monitoring the likely significant effects of the Pre-submission Draft Local Plan and proposes monitoring indicators.
- **Chapter 8: Conclusions** summarises the key findings from the SA of the Pre-submission Draft Local Plan and describes the next steps to be undertaken.

1.22 The main body of the report is supported by a number of appendices (in a separate document) as follows:

- **Appendix 1** presents the consultation comments received in relation to the SA Scoping Report, Emerging Strategy Paper, Draft Plan and Additional Housing Options paper and explains how they have been addressed.
- **Appendix 2** presents the updated baseline information for Stroud District.
- **Appendix 3** presents a summary of the SA findings for the policy options considered as part of the Issues and Options consultation paper (October 2017).
- **Appendix 4** presents the assumptions that have been used in the appraisal of site options.
- **Appendix 5** presents a summary table and the detailed SA matrices for all of the site options that have been considered since the Local Plan Review commenced (including updates to reflect updated evidence base).
- **Appendix 6** presents a summary of the total effects and a description of the expected cumulative SA effects identified for the Draft Plan (November 2019) and a summary of the expected cumulative effects for the Emerging Strategy Paper (November 2018).
- **Appendix 7** presents the detailed SA matrices for the sites included in the Draft Plan (November 2019) and the Pre-submission Draft Local Plan (May 2021) and their accompanying policy requirements.
- **Appendix 8** presents a summary of findings for all strategic growth options that the Council has considered for the distribution of development in the District. This includes the options the Council considered to accommodate its potential increased housing requirement following the Government's proposed but now withdrawn changes to the method for calculating local authorities' housing requirements (as originally presented in the Additional Housing Options consultation October 2020).
- **Appendix 9** sets out an audit trail of the site and policy options considered during preparation of the Local Plan Review and provides the Council's reasons for selecting or rejecting each one.

## 2 Methodology

- 2.1 In addition to complying with legal requirements, the approach being taken to the SA of the Stroud District Local Plan Review is based on current best practice and the guidance on SA/SEA set out in the National Planning Practice Guidance, which involves carrying out SA as an integral part of the plan-making process. **Table 2.1** below sets out the main stages of the plan-making process and shows how these correspond to the SA process.

**Table 2.1: Corresponding stages in plan making and SA**

<b>Local Plan Step 1: Evidence Gathering and engagement</b>
SA stages and tasks
<b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b>
<ul style="list-style-type: none"> <li>• 1: Identifying other relevant policies, plans and programmes, and sustainability objectives</li> <li>• 2: Collecting baseline information</li> <li>• 3: Identifying sustainability issues and problems</li> <li>• 4: Developing the SA framework</li> <li>• 5: Consulting on the scope of the SA</li> </ul>
<b>Local Plan Step 2: Production</b>
SA stages and tasks
<b>Stage B: Developing and refining options and assessing effects</b>
<ul style="list-style-type: none"> <li>• 1: Testing the Local Plan objectives against the SA framework</li> <li>• 2: Developing the Local Plan options</li> <li>• 3: Evaluating the effects of the Local Plan</li> <li>• 4: Considering ways of mitigating adverse effects and maximising beneficial effects</li> <li>• 5: Proposing measures to monitor the significant effects of implementing the Local Plan</li> </ul>
<b>Stage C: Preparing the Sustainability Appraisal Report</b>
<ul style="list-style-type: none"> <li>• 1: Preparing the SA Report</li> </ul>
<b>Stage D: Seek representations on the Local Plan and the Sustainability Appraisal Report</b>
<ul style="list-style-type: none"> <li>• 1: Public participation on Local Plan and the SA Report</li> <li>• 2(i): Appraising significant changes</li> </ul>
<b>Local Plan Step 3: Examination</b>
SA stages and tasks
<ul style="list-style-type: none"> <li>• 2(ii): Appraising significant changes resulting from representations</li> </ul>
<b>Local Plan Step 4 &amp; 5: Adoption and Monitoring</b>
SA stages and tasks
<ul style="list-style-type: none"> <li>• 3: Making decisions and providing information</li> </ul>
<b>Stage E: Monitoring the significant effects of implementing the Local Plan</b>
<ul style="list-style-type: none"> <li>• 1: Finalising aims and methods for monitoring</li> <li>• 2: Responding to adverse effects</li> </ul>

- 2.2 The sections below describe the approach that has been taken to the SA of the Stroud District Local Plan Review to date and provide information on the subsequent stages of the process.

### Stage A: Scoping

- 2.3 The SA process began in April 2018 with the production of a Scoping Report for the Local Plan Review. The SA Scoping Report was prepared by LUC on behalf of Stroud District Council.
- 2.4 The Scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The Scoping Report presented the outputs of the following tasks:

- Policies, plans and programmes of relevance to the Local Plan Review were identified and the relationships between them and the Local Plan Review and the SA were considered, enabling any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed.
- Baseline information was collected on environmental, social and economic issues in Stroud District. This baseline information provides the basis for predicting and monitoring the likely effects of options for policies and site allocations and helps to identify alternative ways of dealing with any adverse effects identified.
- Key sustainability issues for Stroud District were identified.
- A Sustainability Appraisal framework was presented, setting out the SA objectives against which options and subsequently policies would be appraised. The SA framework provides a way in which the sustainability impacts of implementing a plan can be described, analysed and compared. It comprises a series of sustainability objectives and associated sub-questions that can be used to 'interrogate' options and draft policies during the plan-making process. These SA objectives define the long-term aspirations of the District with regard to social, economic and environmental considerations. During the SA, the performances of the plan options (and later, policies) are assessed against these SA objectives and sub-questions.

- 2.5 Public and stakeholder participation is an important part of the SA and wider plan-making processes. It helps to ensure that the SA report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development. The SA Scoping Report was published between April and June 2018 for a five week consultation period with the three statutory consultees (Natural England, the Environment Agency and Historic England) and the general public.
- 2.6 **Appendix 1** lists the comments that were received during the Scoping consultation and describes how each one has been addressed. In light of the comments received a number of amendments have been made to the review of plans, policies and programmes, the baseline information and the key sustainability issues.
- 2.7 As well as changes that have been made to address consultation comments, some parts of the Scoping Report, namely the review of plans, policies and programmes and the baseline information, have been subject to a general update as part of the preparation of this and previous iterations of the SA Report in order to ensure that they reflected the current situation in Stroud District. Updated versions of the review of plans, policies and programmes and the baseline information are presented in **Chapter 3** and **Appendix 2**.
- 2.8 **Table 2.2** overleaf presents the SA framework for the Stroud District Local Plan Review which includes 17 headline SA objectives along with their associated sub-questions. The table also shows how all of the 'SEA topics' (as listed in Schedule 2 of the SEA Regulations) have been covered by the SA objectives in Stroud's SA framework, reflecting the fact that an integrated approach is being taken to the SA and SEA of the Local Plan Review. A small number of changes have been made to some of the sub-objectives in the SA framework since it was presented in the Scoping Report, in response to comments received during the Scoping consultation – these changes are detailed in **Appendix 1**.

**Table 2.2: SA framework for the Stroud District Local Plan Review**

SA Objective	Sub-Objective	Relevant SEA Topics
<b>Social</b>		
SA 1: To provide affordable, sustainable and decent housing to meet local needs.	SA 1.1: Does the Plan deliver the range of types, tenures and affordable homes the District needs over the Plan Period? SA 1.2: Does the Plan increase the supply of affordable homes in urban and rural areas? SA 1.3: Does the Plan reduce the percentage of unfit/ non-decent homes?	Population; Human Health; and Material Assets
SA 2: To maintain and improve the community's health with accessible healthcare for residents, including increasing levels of physical activity, especially among the young.	SA 2.1: Does the Plan improve access to doctors' surgeries and health care facilities? SA 2.2: Does the Plan encourage healthy lifestyles and provide opportunities for sport and recreation, including through the provision of green infrastructure and public open space? SA 2.3: Does the Plan contribute to narrowing health inequalities?	Population; and Human Health
SA 3: To encourage social inclusion, equity, the promotion of equality and a respect for diversity and meet the challenge of a growing and ageing population	SA 3.1: Does the Plan promote equality of access and opportunity and social inclusion through adequate provision and distribution of local community services? SA 3.2: Does the Plan meet the challenge of a growing and ageing population? SA 3.3: Does the Plan help to limit the potential for fuel poverty in the District?	Population; and Human Health
SA 4: To reduce crime, anti-social behaviour and disorder and the fear of crime.	SA 4.1: Does the Plan promote principles of good urban design to reduce the potential for crime in the District? SA 4.2: Does the Plan assist in reducing the fear of crime?	Population; and Human Health
SA 5: To create and sustain vibrant communities.	SA 5.1: Does the Plan help to improve residential amenity (including potential to reduce light, smell and noise pollution) and sense of place? SA 5.2: Does the Plan help to improve the satisfaction of people with their neighbourhoods as places to live and encourage ownership? SA 5.3: Does the Plan safeguard and enhance the identity of the District's existing communities and settlements? SA 5.4: Does the Plan promote regeneration in the District? SA 5.5: Does the Plan provide, protect or enhance locations for cultural activities, including the arts?	Population; Human Health; and Material Assets
SA 6: To maintain and improve access to all services and facilities.	SA 6.1: Does the Plan promote compact, mixed-use development?	Population; and Material Assets

SA Objective	Sub-Objective	Relevant SEA Topics
	<p>SA 6.2: Does the Plan promote the provision of new and the protection of existing services and facilities at sustainable locations?</p> <p>SA 6.3: Does the Plan encourage the protection of existing town centres including their vitality and viability?</p>	
<b>Environmental</b>		
<p>SA 7: To create, protect, enhance, restore and connect habitats, species and/or sites of biodiversity or geological interest.</p>	<p>SA 7.1: Does the Plan avoid adverse effects on designated and undesignated biodiversity and geodiversity assets within and outside the District, including the net loss and fragmentation of green infrastructure and damage to ecological networks?</p> <p>SA 7.2: Does the Plan outline opportunities for improvements to the conservation, connection and enhancement of ecological assets, particularly at risk assets?</p> <p>SA 7.3: Does the Plan provide and manage opportunities for people to come into contact with resilient wildlife places whilst encouraging respect for and raising awareness of the sensitivity of such locations?</p>	<p>Biodiversity; Flora; Fauna; and Landscape</p>
<p>SA 8: To conserve and enhance the local character and distinctiveness of landscapes and townscapes and provide sustainable access to countryside in the District.</p>	<p>SA 8.1: Does the Plan protect and enhance the District's sensitive and special landscapes (including the Cotswolds AONB), and townscapes?</p> <p>SA 8.2: Does the Plan prohibit inappropriate development that will have an adverse effect on the character of the District's countryside and settlements?</p> <p>SA 8.3: Does the Plan promote the accessibility of the District's countryside in a sustainable and well-managed manner?</p> <p>SA 8.4: Does the Plan prevent coalescence between settlements?</p> <p>SA 8.5: Does the Plan protect and enhance the District's natural environment assets (including parks and green spaces, common land, woodland and forest reserves) public realm?</p>	<p>Landscape; Biodiversity; Flora; and Fauna</p>
<p>SA 9: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment.</p>	<p>SA 9.1: Does the Plan avoid adverse effects on the District's designated and undesignated heritage assets (e.g. Scheduled Ancient Monuments, Listed buildings, Historic Parks and Gardens and Conservation Areas), including their setting and their contribution to wider local character and distinctiveness?</p> <p>SA 9.2: Does the Plan outline opportunities for improvements to the conservation, management and enhancement of the District's heritage assets, particularly at risk assets?</p> <p>SA 9.3: Does the Plan promote sustainable and appropriately managed access to as well as enjoyment and understanding of the local historic environment for the District's residents and visitors?</p> <p>SA 9.4: Does the Plan help to preserve and record archaeological features?</p>	<p>Cultural Heritage, including architectural and archaeological heritage</p>

SA Objective	Sub-Objective	Relevant SEA Topics
SA 10: To ensure that air quality continues to improve.	SA 10.1: Does the Plan avoid, minimise and mitigate the effects of poor air quality? SA 10.2: Does the Plan promote more sustainable transport patterns and reduce the need to travel, particularly in areas of high congestion, including public transport, walking and cycling? SA 10.3: Does the Plan promote more sustainable transport patterns in rural areas? SA 10.4: Does the Plan facilitate the continued restoration, management and promotion the canal towpaths as part of the transport infrastructure	Air; Climatic Factors; and Human Health
SA 11: To maintain and enhance the quality of ground and surface waters and to achieve sustainable water resources management in the District.	SA 11.1: Does the Plan seek to avoid deterioration and where possible improve the water quality of the district's rivers and inland water? SA 11.2: Does the Plan enable the use of recycled water and generally reduce the need to make use of water resources? SA 11.3: Does the Plan minimise inappropriate development in Nitrate Vulnerable Zones, Drinking Water Safeguard Zones and Source Protection Zones?	Water; Biodiversity; Fauna; and Flora
SA 12: To manage and reduce the risk of flooding and resulting detriment to public wellbeing, the economy and the environment.	SA 12.1: Does the Plan reduce the risk of flooding from all sources including rivers, watercourses and sewer flooding to people and property? SA 12.2: Does the Plan minimise development in areas prone to flood risk and areas prone to increasing flood risk elsewhere, taking into account the impacts of climate change? SA 12.3: Does the Plan increase the provision of sustainable drainage at new developments? SA 12.4: Does the Plan promote flood risk reduction and improvement to the flood regime?	Water; Soil; Climatic Factors; and Human Health
SA 13: To improve efficiency in land use and protection of soil quality through the re-use of previously developed land and existing buildings and encouraging urban renaissance.	SA 13.1: Does the Plan encourage the appropriate provision of housing development on previously developed land as opposed to greenfield sites? SA 13.2: Does the Plan maximise the provision of employment development on previously developed land as opposed to greenfield sites? SA 13.3: Does the Plan encourage housing densities which would make efficient use of land? SA 13.4: Does the Plan ensure land is remediated where appropriate? SA 13.5: Does the Plan reduce the loss of soil and high grade agricultural land to development?	Soil; and Climatic Factors
SA 14: To implement strategies that help mitigate global warming by actively reducing greenhouse gases and adapt to unavoidable climate change within the District.	SA 14.1: Does the Plan promote energy efficiency and the generation of clean, low carbon, decentralised and renewable electricity and heat? SA14.2. Does the Plan promote the incorporation of small-scale renewable in developments? SA 14.3: Does the Plan promote and facilitate the use of electric cars and sustainable modes of transport?	Climatic Factors; and Air

SA Objective	Sub-Objective	Relevant SEA Topics
	<p>SA 14.4: Does the Plan encourage the use of designs and materials which will promote energy efficiency at new development in the District?</p> <p>SA 14.5: Does the Plan promote the use of locally and sustainably sourced, and recycling of materials in construction and renovation?</p>	
<p>SA 15: To minimise the amount of waste produced, maximise the amount that is reused or recycled, and seek to recover energy from the largest proportion of the residual material, and achieve the sustainable management of waste.</p>	<p>SA 15.1: Does the Plan seek to promote the handling of waste in line with the waste hierarchy?</p> <p>SA 15.2: Does the Plan reduce the production of hazardous waste?</p>	<p>Soil; and Climatic Factors</p>
<b>Economic</b>		
<p>SA 16: To deliver, maintain and enhance sustainable and diverse employment opportunities, to meet both current and future needs.</p>	<p>SA 16.1: Does the Plan allow for an adequate supply of land and the delivery of infrastructure to meet the District's employment needs?</p> <p>SA 16.2: Does the Plan provide for accessible employment opportunities?</p> <p>SA 16.3: Does the Plan support the prosperity and diversification of the District's rural economy?</p> <p>SA 16.4: Does the Plan support equality of opportunity for young people and job seekers and opportunity for the expansion and diversification of business?</p>	<p>Population; and Material Assets</p>
<p>SA 17: To allow for sustainable economic growth within environmental limits and innovation, an educated/ skilled workforce and support the long term competitiveness of the District.</p>	<p>SA 17.1: Does the Plan seek to promote business development and enhance productivity?</p> <p>SA 17.2: Does the Plan maintain and enhance the economic vitality and vibrancy of the District's town centres and tourist attractions?</p> <p>SA17.3: Does the Plan promote the image of the District as an area for investment and will it encourage inward investment?</p> <p>SA17.4: Does the Plan promote access to education facilities for residents?</p> <p>SA17.5: Does the Plan help to support increased economic activity throughout the District?</p>	<p>Population; and Material Assets</p>



## SA Stage B: Developing and refining options and assessing effects

- 2.9 Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.
- 2.10 Regulation 12 (2) of the SEA Regulations requires that:  
*"The (environmental or SA) report must identify, describe and evaluate the likely significant effects on the environment of—*  
*(a) implementing the plan or programme; and*  
*(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme."*
- 2.11 Regulation 16 (4) (d) of the SEA Regulations also requires that on adoption of the plan a statement is prepared that includes:  
*"The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with."*
- 2.12 Any alternatives considered for the plan need to be 'reasonable'. This implies that alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework) or site options that are unavailable or undeliverable.
- 2.13 The SA findings are not the only factors taken into account by a local planning authority when selecting options to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based on sustainability performance in order to select an option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting options for their plan.
- 2.14 This section summarises how the appraisal of options has fed into the development of the Stroud District Local Plan Review. **Appendix 9** presents an audit trail of the site and policy options considered during preparation of the Local Plan Review and an outline of the reasons for the Council's decision making about which options to take forward or discount.

### Identification and appraisal of policy options

- 2.15 High level options for the policies to be included in the Local Plan were identified by the Council officers preparing the plan and published in the Local Plan Review Issues and Options Paper for consultation in October 2017. Reasonable alternative options for various policy topics were drawn from the most up-to-date evidence and guided by the national level policy set out in the NPPF.
- 2.16 The initial policy options were subject to SA by LUC during summer 2018 and the findings were presented to the Council officers preparing the plan in an internal summary note in August 2018, so that the SA findings could inform decision making about which policy options to take forward in the Emerging Strategy Paper. This summary note was a working document which was intended to inform the preparation of the Local Plan and it was not made publicly available at the time. However, the SA findings for the policy options are now presented in **Appendix 3** of this SA Report.
- 2.17 The Emerging Strategy Paper (November 2018) developed the policy options into a set of Key Issues and Needs for the District, a Vision, Strategic Objectives, Emerging Growth Strategy, Settlement Boundaries, 'Mini-Visions for the Parish clusters and potential site allocations. These were all subject to SA by LUC and the findings were presented in the November 2018 SA Report accompanying the Emerging Strategy Paper, along with a description of the likely cumulative effects if the Emerging Strategy was implemented. The likely sustainability effects identified for all elements of the Emerging Strategy Paper are summarised in **Appendix 6** of this SA Report.

- 2.18 The Draft Local Plan (November 2019) reflected the consultation responses and SA findings from the Emerging Strategy consultation and revised the Key Issues, Needs for the District, Vision and Strategic Objectives, and now sets out six Core Policies, draft visions for the parish clusters and draft site allocations with policy requirements, along with a number of Delivery Policies covering Homes and Communities, Economy and Infrastructure and Environment and Surroundings. These elements of the Draft Local Plan were subject to SA within the November 2019 SA Report, and the findings are summarised in **Appendix 6** of this report.
- 2.19 Following the Draft Local Plan stage, in August 2020, the Government published its proposed changes to the way the minimum housing requirement for each local authority area in the country is calculated. In response to this the Council undertook a further focussed consultation on an Additional Housing Options paper between October and December 2020. The Government's changes would have resulted in an increase in the housing requirement for Stroud District from the level set out in the 2019 Draft Local Plan of 638 homes per annum, to 786 homes per annum. The Additional Housing Options paper consulted on the best strategy for identifying where additional housing should be accommodated, whether and where a reserve housing supply should be identified and the specific sites assessed to have potential to meet the additional housing need. Consultation at this stage had a narrow focus on the spatial and site options set out in the document and a short SA Report was prepared to appraise the options considered. The SA findings for the additional growth strategy options (i.e. how growth should be distributed in the District) are summarised in **Appendix 8**.
- 2.20 The Council has made use of the consultation responses and SA findings at the prior stages to update the draft policies and draft site allocations included in the Draft Local Plan and prepare the Pre-submission Draft Local Plan. The policies and site allocations included in the Pre-submission Draft Local Plan have been appraised in **Chapters 4 and 5** and **Appendix 7** of this SA Report.

### Identification and appraisal of site options

- 2.21 The Council identified potentially available and suitable reasonable alternative site options from various sources, including the Council's Strategic Assessment of Land Availability (SALA)<sup>10</sup>, the Brownfield Register and sites promoted through the Issues and Options and Emerging Strategy consultation stages.
- 2.22 The latest assessment undertaken as part of the SALA update has been carried out in accordance with the Council's detailed methodology statement published in February 2016, taking account of guidance which is set out in the National Planning Practice Guidance for undertaking a combined assessment of land available for housing and economic development. All sites located within or adjacent to the most sustainable settlements have been assessed as part of this process. A study threshold of sites capable of delivering 5 or more dwellings, or economic development, other residential development, retail or community uses on sites of 0.25 ha (or 500m<sup>2</sup> of floor space) and above was set at the outset of the assessment process to make the most efficient use of resources.
- 2.23 At each stage in the Local Plan Review, once the Council had identified the reasonable alternative site options, they were subject to SA by LUC. As with the policy options, the first round of SA findings were presented to the Council officers preparing the Local Plan in an internal summary note in August 2018, so that the SA findings could inform decision making about which site options to take forward in the Local Plan Review. This summary note was a working document which was intended to inform the preparation of the Local Plan Review and it was not made publicly available at the time.
- 2.24 However, a summary table showing the SA effects identified and the detailed SA matrices for all of the reasonable alternative site options considered to date can be found in **Appendix 5** of this SA Report. Note that all of the site option appraisals in Appendix 5 (whether originally appraised at the Emerging Strategy or Draft Plan stage) have been updated to reflect updated baseline evidence provided by the Council and some minor revisions to the SA assumptions used (as explained further ahead in this chapter). This appendix also includes the SA findings for the site

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<sup>10</sup> Stroud District Council (October 2018) *Strategic Assessment of Land Availability (SALA) (2019 update published as part of Draft Plan consultation evidence base)*

options appraised as part of the SA work for the Additional Housing Options consultation in October 2020.

- 2.25 The sites that were included as proposed site allocations in the Draft Plan (November 2019) and those that have now been taken forward in the Pre-submission Draft Local Plan (May 2021) have been subject to SA by LUC. This appraisal work takes into account the information set out for each draft site allocation (in the Draft Plan) and/or site allocation policy (in the Pre-submission Draft Local Plan). The information for each site is set out in Chapter 3 of the Draft Plan and Pre-submission Draft Local Plan. The detailed SA matrices for the draft site allocations included in the Draft Plan (November 2019) and the site allocation policies included in the Pre-submission Draft Local Plan (May 2021) are presented in **Appendix 7** of this SA Report. The detailed matrices in Appendix 7 also clarify which sites have been included in either the Draft Plan or the Pre-submission Draft Local Plan. **Chapter 5** summarises the findings for the site allocation policies that have now been taken forward in the Pre-submission Draft Local Plan.
- 2.26 As noted above, **Appendix 9** presents the audit trail of all reasonable alternative site options considered and the Council's reasons for including them or not at each stage of the plan preparation, i.e. in the Emerging Strategy Paper, the Draft Plan and the Pre-submission Draft Local Plan, and for the use proposed.

## SA Stage C: Preparing the Sustainability Appraisal report

- 2.27 This SA Report describes the process that has been undertaken to date in carrying out the SA of the Stroud District Local Plan Review. It sets out the findings of the appraisal of policy and site options, and the emerging strategy policy approaches and sites, highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects). It also describes the reasons for selecting or rejecting certain options during the preparation of the Stroud District Local Plan Review.

## SA Stage D: Consultation on the Stroud District Local Plan Review – Draft Plan and this SA Report

- 2.28 Stroud District Council is inviting comments on the Pre-submission Draft Local Plan and this SA Report. Both documents are being published on the Council's website for consultation between 26th May and 7th July 2021.
- 2.29 **Appendix 1** presents the consultation comments that were received in relation to the SA Scoping Report, Emerging Strategy Paper, Draft Plan and Additional Housing Options paper and explains how each comment has been addressed in the SA work undertaken since then.

## SA Stage E: Monitoring implementation of the Local Plan Review

- 2.30 Recommendations for monitoring the likely significant social, environmental and economic effects of implementing the Stroud District Local Plan Review are presented in **Chapter 7**.

## Appraisal methodology

- 2.31 The reasonable alternative policy and site options for the Local Plan Review have been appraised against the SA objectives in the SA framework (see **Table 2.2** earlier in this section), with scores being attributed to each option or policy to indicate its likely effects on each SA objective as follows:

**Figure 2.1: Key to symbols and colour coding used in the SA of the Stroud District Local Plan Review**

++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
+/- OR ++/--	Mixed minor or significant effects likely
-	Minor negative effect likely
--/+	Mixed significant negative and minor positive effects likely
--	Significant negative effect likely
0	Negligible effect likely
?	Likely effect uncertain

- 2.32 Where a potential positive or negative effect is uncertain, a question mark was added to the relevant score (e.g. +? or -?) and the score has been colour coded as per the potential positive, negligible or negative effect (e.g. green, yellow, orange, etc.).
- 2.33 The likely effects of options and policies need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option or policy on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.
- 2.34 Mixed effects have only been presented where directly opposing effects (i.e. positive and negative) have been identified through the appraisal (e.g. +/-, ++/-, --/+ and ++/--). For some SA objectives, it is possible that a policy or site might have a minor positive effect in relation to one aspect of the policy and a significant positive effect in relation to another aspect (giving a score of +/++). However, in these instances, only the most significant score is shown in the appraisal tables. Similarly if a policy or site could have a minor and significant negative effect (-/-) for the same SA objective, only the significant negative score is shown in the appraisal tables. The justification text relating to the appraisal describes where the various elements of the policy or site being appraised might have potential to result in effects of differing magnitude.
- 2.35 The likely sustainability effects of the Pre-submission Draft Local Plan are summarised in **Chapter 4** and **Chapter 5**. An assessment of the potential cumulative impacts of the Pre-submission Draft Local Plan as a whole is presented in **Chapter 6**.

#### Assumptions applied during the SA

- 2.36 SA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the site options, detailed sets of assumptions were developed and applied, with a separate set of assumptions relating to each type of site option. These assumptions set out clear parameters within which certain SA scores would be given, based on factors such as the distance of site options from features such as biodiversity designations, public transport links and areas of high landscape sensitivity. The assumptions are presented in **Appendix 4** and were applied through the use of Geographical Information Systems (GIS) data.

- 2.37 The assumptions applied when considering the reasonable alternatives and the subsequent potential sites have been updated following further new evidence presented as part of the Local Plan Review as well as comments received from the statutory consultees.
- 2.38 The Settlement Role and Function Study Update 2018<sup>11</sup> proposed a number of changes to the settlement hierarchy for the District. This work has been used to inform the inclusion of a revised settlement hierarchy in the Draft Plan and subsequently the Pre-submission Draft Local Plan (Policy CP3 in both documents, with no change to the tier at which settlements sit). Updates to the settlement hierarchy in the Draft Plan (which have subsequently been carried through to the Pre-submission Draft Local Plan) also reflect additional support for brownfield development and the proposed development strategy.
- 2.39 The changes have removed the 'fifth tier' resulting in settlements previously identified as 'fifth tier' settlements being reclassified as fourth tier settlements. These fourth tier settlements are now subdivided between Tier 4a settlements (which may be unable to meet residents' day to day requirements but are relatively well-connected and accessible settlements) and Tier 4b settlements (which lack the range of services to meet day to day requirements and are generally inaccessible with significant environmental constraints). This work also divided the previously identified third tier settlements between Tier 3a and Tier 3b settlements. Tier 3a settlements are those which have been identified as providing access to a good range of local services and facilities. Tier 3b settlements have been identified as providing access to a more basic level of services and facilities. Changes have been made to the assumptions relating to SA objective 6 in light of this new evidence.
- 2.40 As part of the consultation comments received on the SA Report for the Local Plan Review: Emerging Strategy Paper the Environment Agency recommended an update to SA objective 12, which has now been revised.
- 2.41 Revisions to SA objective 6 and SA objective 12 are detailed in **Appendix 4**. The changes to these SA objectives have been denoted by underlined text. In light of these changes, revisions have been made to the appraisal matrices for all site options considered to date (as shown in **Appendix 5**).

## Difficulties encountered and data limitations

- 2.42 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process.
- 2.43 During the appraisal of the policy options the fact that options had not yet been worked up in detail (comprising only suggested policy approaches) meant that at times it was difficult to assess in detail the likely effects of the options on each SA objective. Once draft policies are worked up in more detail it is possible to draw more certain conclusions about their likely effects.
- 2.44 There was a need to appraise a large number of site options consistently. In order to address this issue, detailed assumptions relating to each of the SA objectives were developed and applied during the appraisal of site options (as described above).
- 2.45 A number of limitations relating to the GIS data that was used to apply the assumptions are recognised:
- The available data for Local Geological Sites (relevant to SA objective 7: biodiversity and geodiversity) showed their locations only as a central point and not a site boundary. The proximity of site options to Local Geological Sites was therefore only able to be measured in relation to that central point.
  - The available data for flood zones 3a and 3b was combined as flood zone 3 and did not distinguish between 3a and 3b. This resulted in some uncertainty in the scores, as set out in the assumptions (see **Appendix 4**).

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<sup>11</sup> Stroud District Council (May 2019) *Settlement Role and Function Study Update 2018*

- The available data for agricultural land classification did not distinguish between Grade 3a (considered to be high quality) and 3b (not considered to be high quality). This again resulted in some uncertainty in the scores, as set out in the assumptions (see **Appendix 4**).
- GIS data used to inform the assessment was generally only available for the extent of Stroud District, which could affect the SA findings for sites on the edge of the District.
- The Council has commissioned consultants to prepare a strategic approach to mitigate recreation impacts, associated with new housing growth, on the Cotswolds Beechwoods SAC<sup>12</sup>. The draft strategy applies to a zone of influence of 15.4km from the Cotswold Beechwoods SAC, with the boundary of the zone adjusted slightly to reflect the local geography and local authority boundaries. The zone covers much of Stroud District to the north of Dursley. Within the zone of influence all new residential growth will be expected to provide mitigation. Measures include Strategic Access Management and Monitoring ('SAMM') to manage access and engaging with visitors and the delivery of Suitable Natural Alternative Greenspace ('SANG') to deflect access away from the SAC and provide alternative countryside destinations.

The appraisal of site options in relation to SA objective 7: biodiversity/geodiversity has not considered the proposed zone of influence for the Cotswolds Beechwoods SAC given that the mitigation strategy is still in draft form and has not yet been finalised. The proximity of site options to the Cotswolds Beechwoods SAC has been considered through the SA in the same manner as all other international and national biodiversity designations (in line with the assumptions set out in **Appendix 4**). Sites within 250m of one or more international or national biodiversity or geodiversity sites have been appraised as likely to have a significant negative effect and sites that are between 250m and 1km of one or more international or national sites may have a minor negative effect.

- The landscape sensitivity study and the SALA heritage assessment work which was used to inform the appraisal of site options against SA objectives 8: landscape and 9: historic environment did not cover every site option. Where the evidence did not cover a particular site, an uncertain (?) score was applied (see assumptions in **Appendix 4**). Given the high number of uncertain effects recorded for site options at the Draft Plan stage and to try to ensure that the appraisal of SA objective 8: landscape was based on available and up to date information, where an uncertain effect was recorded in the SA for the Draft Plan, this objective has subsequently been revisited for these site options in the SA for the Pre-submission Draft Local Plan. For these sites, the landscape assessment from the Gloucestershire Strategic Development Opportunities assessment<sup>13</sup> has been used to attribute a likely effect.

This assessment work does not cover all of Stroud District and therefore uncertain effects on landscape are still recorded for some site options. Furthermore, the Gloucestershire study assessed areas of the County for their suitability to accommodate new large scale urban extension development or new settlements. The scale of development tested through this work ranged from 500 to 3,500+ dwellings for urban extensions and 1,500 to 10,000+ dwellings for new settlements. Given that many of the sites considered as part of the Stroud Local Plan Review are relatively small in size, additional uncertainty is likely in relation to the effects recorded making use of the findings of the Gloucestershire Strategic Development Opportunities assessment. Where this is the case, it is highlighted in the appraisal findings text.

- The SALA accessibility assessment undertaken by Gloucestershire County Council was only appropriate for using in the appraisal of residential and mixed use sites, but not employment site options. The assumptions that were used for the appraisal of employment site options (see **Appendix 4**) therefore draws on GIS data showing the location of bus stops (but not frequency of services from each bus stop). This dataset showed the location of all bus stops, including some that may not be well-served by existing bus services.

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<sup>12</sup> Footprint Ecology (2021) *Cotswold Beechwoods SAC Recreation Mitigation Strategy*

<sup>13</sup> LUC on behalf of Gloucester City Council, Cheltenham Borough Council, Tewkesbury Borough Council, Stroud District Council and Forest of Dean District Council (October 2019) *The Assessment of Strategic Development Opportunities in Parts of Gloucestershire*

- This assessment considered the travel times by walking, car and bus to various key destinations<sup>14</sup> attributing a score of 1 for travel times under 15 minutes, 2 for travel times between 15 and 30 minutes and 3 for travel times of over 30 minutes. A maximum distance of 400m to bus stops was used to consider travel by bus. The assessment did not consider the practicality of the journeys from each site. Measurements were only taken to existing bus stops and did not take into account possible highway and transport improvements as part of the development of site options. Once scores were attributed in relation to each journey type, these were then added to give a total for each site and the significance of effect was applied in line with the SA assumptions in **Appendix 4**. The SALA accessibility assessment was updated by Gloucestershire County Council in November 2020 to account for changes in public transport frequencies and updates to services and facilities. Updates in this work have been reflected for all site options (where a change is made in the County Council’s assessment) meaning that the appraisal of SA objective 12: air quality differs between the Draft Plan and Pre-submission Draft Local Plan for some site options.
- Due to the sensitivity of data relating to schools’ capacities it was not possible to appraise the draft site allocations individually in relation to impacts on access to education facilities. However, the findings of Gloucestershire County Council’s School Places Strategy<sup>15</sup> have been used to provide an overview of where problem issues relating to capacity might emerge as new growth provided over the plan period.

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<sup>14</sup> Principal/Other Town Centre, Key Employment Site, Library, Primary School, Secondary School, Bank/Building Society, GP Surgery, A&E or Minor Injuries Unit, Leisure Centre, Railway Station, Major Brand Supermarket, Post Office, District/ Local or Neighbourhood Centre, Community Centre/Hall.

<sup>15</sup> Gloucestershire County Council (November 2018) *School Places Strategy 2018-2023*

### 3 Sustainability Context for Development in Stroud District

- 3.1 The Pre-submission Draft Local Plan sets out support for the delivery of new housing, employment, retail and community development that will meet local requirements up to 2040. It includes the proposed development strategy for distributing development within the District and policies for protecting and conserving the natural and built environment.
- 3.2 The Pre-submission Draft Local Plan presents the key priorities for the District. These have been updated from the key issues originally presented in the Emerging Strategy Paper and are mostly in line with those included in the Draft Local Plan. These priorities provide the starting point for the updated policies contained in the Pre-submission Draft Local Plan which are to guide growth over the plan period. Updated priority issues for Stroud have been identified as:
- Moving the District towards becoming Carbon Neutral by 2030.
  - Ensuring new housing development is located in the right place and supported by the right services and infrastructure.
  - Conserving and enhancing Stroud District's countryside and biodiversity.
  - Maximising the potential of brownfield sites to contribute to housing supply.
  - Developing strategies to enhance the natural environment and to avoid, reduce and mitigate the indirect impacts of development on the natural environment.
  - Addressing the lack of affordable housing the District.
- 3.3 The document also provides an overview of what the District is to look like as guided by the principles of the Local Plan Review over the twenty year period up to 2040. This aspirational vision of the District is supported by the inclusion of seven strategic objectives which provide a more tangible way of taking forward the overall vision for the District.
- 3.4 The strategic objectives included relate to achieving accessible, healthy, inclusive and safe communities; promoting the local economy and jobs opportunities across the District; supporting town centres and rural hinterlands; promoting healthier and more sustainable modes of transport; supporting climate change mitigation and respecting environmental limits; and conserving and enhancing the District's landscape, heritage, townscape and biodiversity.
- 3.5 Chapter 2 (Making Places: the development strategy) of the Pre-submission Draft Local Plan presents a description of the options considered for the proposed development strategy; i.e. where new development will be provided in Stroud District. Headline needs of the District related to specific locations in Stroud District as well as the overall housing and employment requirements over the plan period are also described. In effect the six 'Core Policies' which sit at the heart of the plan define and provide the delivery mechanism for the Draft Plan's proposed development strategy. They also set out the target of achieving Carbon Neutral by 2030, as well as defining the hierarchy for growth (with associated settlement development limits updates provided in the related appendix) and include place making and environmental development principles for strategic sites. Changes to settlement development limits have been made at Berkeley, Cam, Cambridge, Dursley, Eastington, Hardwicke, Hillesley, Horsley, Kings Stanley, Leonard Stanley, Middleyard, Miserden, Newtown, Stonehouse, Stroud, Uley and Whitminster. These changes were included in the Draft Local Plan (November 2019). Changes to the settlement development limits at Coaley, Kingswood, South Woodchester and Whitminster, which are over and above those included in the Draft Local Plan (November 2019), are included in the Pre-submission Draft Local Plan to respond to public consultation and the Council's evidence base. Where changes have been made to settlement development limits they reflect physical changes since the last boundary review and the intended function of the settlements in question in terms of managing future growth.



- 3.6 Chapter 3 (Making Places: Shaping the future of Stroud District) of the Pre-submission Draft Local Plan also provides the spatial vision for Stroud District and the eight distinct parts of the District. Place-making 'mini visions' have been included for each of these distinct areas. This section also sets out the sites proposed for allocation in the Pre-submission Draft Local Plan. These are presented in relation to the settlements at which they lie or which they are mostly closely related.
- 3.7 The Pre-submission Draft Local Plan also contains chapters which contain overarching Core Policies as well as Delivery Policies relating to the following topics and associated approaches:
- Homes and communities: delivering the District's housing target with a range of dwelling sizes, types and tenures, delivering more affordable homes and achieving mixed and balanced places, which have access to services and amenities that meet local needs and help build sustainable communities.
  - Economy and infrastructure: supporting economic growth by delivering a range and mix of employment uses, sites and types in the most appropriate location for the particular use supported by and integrated with housing and other community infrastructure.
  - Environment and surroundings: moving the District towards becoming Carbon Neutral by 2030, adapting to the effects of climate change and providing resilience for the future, whilst ensuring that development protects, conserves or enhances our local environment.

## Review of Plans, Policies and Programmes

- 3.8 Schedule 2 of the SEA Directive requires:
- (a) *"an outline of the...relationship with other relevant plans or programmes"; and*
- (e) *"the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation"*
- 3.9 In order to establish a clear scope for the SA it is necessary to review and develop an understanding of the environmental, social and economic objectives contained within international and national policies, plans and strategies that are of relevance to the Stroud District Local Plan Review. Given the SEA Directive requirements above, it is also necessary to consider the relationship between the Stroud District Local Plan Review and other relevant plans, policies and programmes.
- 3.10 This chapter summarises the relevant international and national policies, plans and programmes which should be taken into consideration during preparation of the Stroud District Local Plan Review and its SA, as well as those plans and programmes which are of relevance at a regional and local level. The objectives of these plans and programmes were taken into account when drafting the SA framework in **Chapter 2**.
- 3.11 It should be noted that the policy context within which the Stroud District Local Plan Review and its SA are being prepared is inherently uncertain given the following key factors:
- Brexit - Following the United Kingdom's (UK) departure from the European Union (EU) on 31 January 2020, it entered a transition period which ended on 31 December 2020. From 1 January 2021, directly applicable EU law no longer applies to the UK and the UK is free to repeal EU law that has been transposed into UK law. For completeness relevant EU legislation has still been referred to in this report where UK legislation is yet to be amended.
  - COVID-19 – The COVID-19 pandemic has led to far-reaching changes to society in the UK and around the world. Which of these changes will continue in the long term is unknown and will depend on a variety of factors, notably the success of the ongoing vaccination programme to combat the disease. Potential implications for planning and development include Government measures to re-start the economy via support for housebuilding and infrastructure development; changes to permitted development rights; increased remote working and reduced commuting and related congestion and air pollution; increased prioritisation of walking and cycling over public transport; and increasing pressure to ensure satisfactory living standards are set and enforced.

- Planning for the Future White Paper – The August 2020 consultation sets out proposals for the reform of the planning system in England, covering plan-making, development management, development contributions, and other related policy proposals. Potential implications include reducing the period of a Local Plan period to 10 years; a move towards a zonal planning system with areas of England allocated as either Growth Areas; Renewal Areas or Protected Areas; and the abolition of Community Infrastructure Levy (CIL) and Section 106.

3.12 A number of changes to the policy review presented below have been made since it was originally presented in the Scoping Report (April 2018), as a result of comments received from consultees (see **Appendix 1**).

### International

- 3.13 **United Nations (UNESCO) World Heritage Convention** (1972): Promotes co-operation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.
- 3.14 **International Convention on Wetlands (Ramsar Convention)** (1976): International agreement with the aim of conserving and managing the use of wetlands and their resources.
- 3.15 **International Convention on Biological Diversity** (1992): International commitment to biodiversity conservation through national strategies and action plans.
- 3.16 **United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention')** (1998): Establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.
- 3.17 **United Nations Declaration on Sustainable Development (Johannesburg Declaration)** (2002): Sets broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.
- 3.18 **United Nations Declaration on Forests (New York Declaration)** (2014): Sets out international commitment to cut natural forest loss by 2020 and end loss by 2030.
- 3.19 **United Nations Paris Climate Change Agreement** (2015): International agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.
- 3.20 **European Convention for the Protection of the Architectural Heritage of Europe** (1985): Defines 'architectural heritage' and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.
- 3.21 **European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention)** (1979): Aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).
- 3.22 **European Nitrates Directive** (1991): Identifies nitrate vulnerability zones and puts in place measures to reduce water pollution caused by the introduction of nitrates.
- 3.23 **European Urban Waste Water Directive** (1991): Protects the environment from the adverse effects of urban waste water collection, treatment and discharge, and discharge from certain industrial sectors.
- 3.24 **European Habitats Directive** (1992): Together with the Birds Directive, the Habitats Directive sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.

- 3.25 **European Air Quality Framework Directive** (1996) and **Air Quality Directive** (2008): Put in place measures for the avoidance, prevention, and reduction in harmful effects to human health and the environment associated with ambient air pollution and establish legally binding limits for the most common and harmful sources of air pollution.
- 3.26 **European Drinking Water Directive** (1998): Protects human health from the adverse effects of any contamination of water intended for human consumption by ensuring that it is wholesome and clean.
- 3.27 **European Landfill Directive** (1999): Prevents and reduces the negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills.
- 3.28 **European Water Framework Directive** (2000): Protects inland surface waters, transitional waters, coastal waters and groundwater.
- 3.29 **European Landscape Convention** (2002): Promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.
- 3.30 **European Environmental Noise Directive** (2002): Sets out a hierarchy for the avoidance, prevention and reduction in adverse effects associated with environmental noise, including noise generated by road and rail vehicles, infrastructure, aircraft and outdoor, industrial and mobile machinery.
- 3.31 **European Waste Framework Directive** (2008): Sets out the waste hierarchy requiring the reduction of waste production and its harmfulness, the recovery of waste by means of recycling, re-use or reclamation and final disposal that does not harm the environment, including human health.
- 3.32 **European Birds Directive** (2009): Requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.
- 3.33 **European Floods Directive** (2007): A framework for the assessment and management of flood risk, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity.
- 3.34 **European Industrial Emission Directive** (2010): Lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole.
- 3.35 **European Energy Performance of Buildings Directive** (2010): Aims to promote the energy performance of buildings and building units. Requires the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance.
- 3.36 **SEA Directive 2001 Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment** (2001): Aims to provide for a high level of protection of the environment and contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development.
- 3.37 **Directive 2015/1513 of the European Parliament and of the Council amending Directive 98/70/EC relating to the quality of petrol and diesel fuels and amending Directive 2009/28/EC on the promotion of the use of energy from renewable sources** (2015): This Directive creates a common framework for the use of renewable energy in the EU so as to limit greenhouse gas (GHG) emissions and promote cleaner transport, and includes a sustainability objective relating to increasing energy provided from renewable sources.
- 3.38 **Strategic Plan 2016-2020** (2016): In order to contribute to achieving the overall goals set at EU level, the Commission has set a number of General Objectives based on the priorities outlined by President Juncker. The SA should consider the general and specific objectives when developing the sustainability framework.

- 3.39 **Renewable Heat Incentive (RHI)** (2018): The RHI aims to increase the amount of renewable energy used for heating. Include a sustainability objective relating to increasing energy provided from renewable sources.

### National

- 3.40 **The National Planning Policy Framework (NPPF)**<sup>16</sup> is the most significant national policy context for the Local Plan Review. The publication of the National Planning Policy Framework (NPPF) in 2018 (as updated in February 2019) which is supported by the online Planning Practice Guidance (PPG)<sup>17</sup> provides a particularly important context for the production of the SA. The Local Plan must be consistent with the requirements of the NPPF, which sets out information about the purposes of local plan-making. It states that in addition to being positively prepared, justified and effective, Local Plans will be considered sound if they are capable of:
- "enabling the delivery of sustainable development in accordance with the policies in (the) Framework."*
- 3.41 The presumption in favour of sustainable development is to be given priority in plan-making and in the decision making process. Specific to the plan-making process this will mean that:
- "a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas , unless:*
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
  - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*
- 3.42 In addition to contributing to the achievement of sustainable development the NPPF also requires Local Plans to be prepared positively in a way that is 'aspirational but deliverable'. This means that opportunities for appropriate development should be identified in order to achieve net gains across the three overarching objectives of sustainable development: that is to say achieving the economic, social and environmental objectives of the planning system. Significant adverse impacts on these objectives should be avoided however and, where possible, alternative options which reduce or eliminate these types of impacts should be taken forward. Where this is not possible mitigation followed by compensatory measures should be pursued.
- 3.43 National policy within the NPPF of most relevance to the emerging Local Plan Review has been summarised below. It should be noted that between January and March 2021 the Government consulted on draft revisions to the NPPF<sup>18</sup> in response to the Building Better Building Beautiful Commission "Living with Beauty" report. The consultation also sought views on the draft National Model Design Code<sup>19</sup>, which provides detailed guidance on the production of design codes, guides and policies to promote successful design. At the time of writing, the outcome of this consultation was yet to be finalised.
- 3.44 The Government sets out goals for managing and improving the environment within the next 25 years within its **environment plan**<sup>20</sup>. The document seeks to influence planning at a local level and therefore will be relevant to the scope of the SA and the Local Plan Review process. Reference has been included within each topic below to the relevant text from the environment plan.

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<sup>16</sup> Ministry of Housing, Communities and Local Government (February 2019) *National Planning Policy Framework*

<sup>17</sup> <http://planningguidance.planningportal.gov.uk/>

<sup>18</sup> Ministry of Housing, Communities and Local Government (2020) *National Planning Policy Framework (Draft text for consultation)*

<sup>19</sup> Building Better, Building Beautiful Commission (2020) *Building Better Building Beautiful Commission "Living with Beauty"*

<sup>20</sup> HM Government (January 2018) *A Green Future: Our 25 Year Plan to Improve the Environment*

### *Population Growth, Health and Wellbeing*

- 3.45 The **NPPF** includes as part of its social objective the promotion of “*strong, vibrant and healthy communities*” by:
- “*ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and*
  - *by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being.*”
- 3.46 Ultimately planning policies and planning decision making should “*aim to achieve healthy, inclusive and safe places*”.
- 3.47 The document states that strategic policies should set out the pattern, scale and quality of development and make sufficient provision for “*housing (including affordable housing) ... [as well as] community facilities (such as health, education and cultural infrastructure).*” Policies should reflect “*the size, type and tenure of housing needed*”. This policy approach is to include but should not be limited to housing requirements relating to affordable homes, families with children older people, students, people with disabilities, service families, travellers, those who rent their homes and people wishing to commission the construction of their own homes. At major developments providing new housing planning policies and decisions should be expected at least 10% of new provision to be delivered for affordable home ownership subject to conditions and exemptions.
- 3.48 To help to diversify opportunities for builders, promote a better mix of site sizes and increase the number of schemes that can be built-out quickly to meet housing need, the NPPF states that at least 10% of the sites allocated for housing through a local authority’s plan should be half a hectare or smaller.
- 3.49 Where there is an identified need, development of sites not already allocated for housing to provide entry-level homes suitable for first-time buyers is to be supported by local planning authorities unless such need is already to be met at other locations within the authority area. These sites should comprise of entry-level homes that offer one or more types of affordable housing.
- 3.50 The document also promotes a theme of enhancing healthy and safe communities which is to be achieved by creating places which “*promote social interaction (and) enable and support healthy lifestyles.*”
- 3.51 As part of this approach social, recreational and cultural facilities and services that the community needs should be provided guided by planning policies which:
- “*plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services;*
  - *support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;*
  - *guard against the unnecessary loss of valued facilities and services.*”
- 3.52 Plan making through the guidance of the NPPF recognises the important role of access to open spaces and other facilities which provide opportunities for sport and physical activity has in terms of health and well-being of communities. The importance of delivering a sufficient choice of school places to meet the needs of existing and new communities is also recognised in the document and local planning authorities should take a “*proactive, positive and collaborative approach to meeting this requirement*”.
- 3.53 The NPPF also sets out that the standard method provided in national planning guidance should be used to undertake a local housing need assessment identifying the minimum number of homes needed. The **Housing Delivery Test Measurement Rule Book**<sup>21</sup> provides this standard method allowing for calculation of objectively assessed housing need using government household

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<sup>21</sup> Ministry of Housing, Communities and Local Government (July 2018) *Housing Delivery Test Measurement Rule Book*

forecasts adjusted for local house prices and local earnings. Unmet need from neighbouring areas will also need to be taken into account as part of the calculation.

3.54 **A Green Future: Our 25 Year Plan to Improve the Environment** sets out goals for improving the environment over the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. The document identifies six key areas upon which action will be focused. Those of relevance to the topics of population growth, health and wellbeing are using and managing land sustainably; and connecting people with the environment to improve health and wellbeing. These two key areas are of relevance to the emerging Local Plan Review as follows:

- Using and managing land sustainably:
  - Embed an 'environmental net gain' principle for development, including housing and infrastructure.
- Connecting people with the environment to improve health and wellbeing:
  - Help people improve their health and wellbeing by using green spaces including through mental health services.
  - Encourage children to be close to nature, in and out of school, with particular focus on disadvantaged areas.
  - 'Green' our towns and cities by creating green infrastructure and planting one million urban trees.
  - Make 2019 a year of action for the environment, working with Step Up To Serve and other partners to help children and young people from all backgrounds to engage with nature and improve the environment.

#### *Economy*

3.55 The **NPPF** contains an economic objective to *"help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity."*

3.56 It also requires that planning seeks to *"create the conditions in which businesses can invest, expand and adapt"* with policies required to *"set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth"*. Policies addressing the economy should also seek *"to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment."*

3.57 Planning policies are also required specifically to address support for the rural economy. Sustainable growth and expansion of all types of business and enterprise in rural areas should be supported, both through conversion of existing buildings and well-designed new buildings, while the diversification of the rural economy and promotion of sustainable rural tourism and leisure developments is also supported

3.58 The NPPF also supports the role of town centres as functioning at the heart of local communities. This support is required to provide for a *"positive approach to [town centres'] growth, management and adaptation."* Included within this support is a requirement to *"allocate a range of suitable sites in town centres to meet the scale and type of development needed, looking at least ten years ahead."*

#### *Transport*

3.59 The **NPPF** requires that *"transport issues should be considered from the earliest stages of plan-making"*. The scale, location and density of development should reflect *"opportunities from existing or proposed transport infrastructure"*. To help reduce congestion and emissions, and improve air quality and public health the planning system should focus significant development *"on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."* The draft revised framework also requires that planning policies support an appropriate mix of uses across an area to further help reduce the need to travel as well as the provision of high quality walking and cycling network.

3.60 While the framework promotes the use and development of sustainable transport networks it also requires that *"where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development"* should be identified and protected.

#### *Air, Land and Water Quality*

3.61 The **NPPF** states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued soil and the economic and other benefits of the best and most versatile agricultural land. Policies should also prevent new and existing development from *"contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution."*

3.62 The document also requires that strategic policies should seek to make the most effective use of land in meeting local requirements making as much use as possible of previously-developed or 'brownfield' land. Furthermore policies should *"support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land"*.

3.63 **A Green Future: Our 25 Year Plan to Improve the Environment**<sup>22</sup>: Of the key areas in the document around which action will be focused, those of relevance in terms of the protection of air, land and water quality are using and managing land sustainably; recovering nature and enhancing the beauty of landscapes; and increasing resource efficiency, and reducing pollution and waste. The three key areas of relevance to the emerging Local Plan Review are as follows:

- Using and managing land sustainably:
  - Embed a 'net environmental gain' principle for development, including natural capital benefits to improved and water quality.
  - Protect best agricultural land.
  - Improve soil health, and restore and protect peatlands.
- Recovering nature and enhancing the beauty of landscapes:
  - Respect nature by using our water more sustainably.
- Increasing resource efficiency and reducing pollution and waste:
  - Reduce pollution by tackling air pollution in our Clean Air Strategy and reduce the impact of chemicals.

#### *Climate Change Adaptation and Mitigation*

3.64 The **NPPF** contains as part of its environmental objective a requirement to mitigate and adapt to climate change, *"including moving to a low carbon economy"*. The document also states that the *"planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change."* To achieve these aims new development should be planned to ensure appropriate adaptation measures are included (including green infrastructure) and should be designed, located and orientated as to help to reduce greenhouse gas emissions.

3.65 The revised framework also requires that development is directed away from areas which are at highest existing or future risk of flooding. Where development is required in such areas, the *"development should be made safe for its lifetime without increasing flood risk elsewhere."*

3.66 In relation to coastal change in England planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Furthermore plans should *"reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast"*.

3.67 **A Green Future: Our 25 Year Plan to Improve the Environment**<sup>23</sup>: The key areas in the document of relevance in terms of responding to climate change are using and managing land

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<sup>22</sup> HM Government (2018) A Green Future: Our 23 Year Plan to Improve the Environment [online] Available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/673203/25-year-environment-plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf)

<sup>23</sup> HM Government (2018) A Green Future: Our 23 Year Plan to Improve the Environment [online] Available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/673203/25-year-environment-plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf)

sustainably; and protecting and improving our global environment. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
  - Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.
- Protecting and improving our global environment:
  - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

### *Biodiversity*

- 3.68 A further requirement of the **NPPF's** environmental objective is that the planning system should contribute to protecting and enhancing the natural environment including helping to improve biodiversity, and using natural resources prudently. In support of this aim the framework states that Local Plans should "*identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks*" and should also "*promote the conservation, restoration and re-creation 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.*"
- 3.69 The framework requires that plans should take a strategic approach in terms of "*maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries*".
- 3.70 **A Green Future: Our 25 Year Plan to Improve the Environment**<sup>24</sup>: The key areas in the document of relevance in terms of the protection and promotion of biodiversity are recovering nature and enhancing the beauty of landscapes; securing clean, productive and biologically diverse seas and oceans; and protecting and improving our global environment. Actions that will be taken as part of these three key areas are as follows:
- Recovering nature and enhancing the beauty of landscapes:
    - Develop a Nature Recovery Network to protect and restore wildlife, and provide opportunities to re-introduce species that have been lost from the countryside.
  - Securing clean, healthy, productive and biologically diverse seas and oceans:
    - Achieve a good environmental status of the UK's seas while allowing marine industries to thrive, and complete our economically coherent network of well-managed marine protected areas.
  - Protecting and improving our global environment:
    - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.
    - Support and protect international forests and sustainable agriculture.

### *Historic Environment*

- 3.71 Of relevance to the approach of the planning system to the historic environment the **NPPF** contains an environmental objective to contribute to the protection and enhancement of the built and historic environment. The document also sets out a strategy to seek "*the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay and other threats.*" Such a strategy is required to take into consideration the desirability of sustaining and enhancing the significance of heritage assets and bringing them into viable use.
- 3.72 It should also be considerate of the wider benefits of conserving the historic environment, the contribution new development can make in terms of character and distinctiveness and the opportunity for the historic environment to contribute to this character and distinctiveness. Local

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<sup>24</sup> HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] Available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/673203/25-year-environment-plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf)



authorities should also maintain or have access to a historic environment record which is to be supported by up to date evidence.

### Landscape

- 3.73 The Stroud Local Plan Review will be required to have consideration for the conservation and enhancement of landscape character in the District. The **NPPF** includes as part of its approach to protecting the natural environment, recognition for the intrinsic character and beauty of the countryside, and the wider benefits to be secured from natural capital. Importantly, great weight is to be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty.
- 3.74 As part of the approach to achieving well-designed places the NPPF states that planning policies and decisions should ensure that developments “*are sympathetic to local character and history, including the surrounding built environment and landscape setting.*”
- 3.75 **A Green Future: Our 25 Year Plan to Improve the Environment**<sup>25</sup>: The key area in the document of relevance in terms of the conservation and enhancement of landscape character is recovering nature and enhancing the beauty of landscapes. Actions that will be taken as part of this key area are as follows:
- Working with AONB authorities to deliver environmental enhancements.
  - Identifying opportunities for environmental enhancement of all England’s Natural Character Areas, and monitoring indicators of landscape character and quality.

### Sub National

- 3.76 **Gloucestershire's Climate Change Strategy**<sup>26</sup>: The vision for the Strategy is that by 2050 a carbon neutral county will have been created within which quality of life now and for future generations is provided. The quality of the natural environment will also have been improved. By 2030 the county will have reduced its carbon emissions by 80%. Actions set out to assist with achieving the vision include:
- Gloucestershire Tree Strategy – commitment to planting 35 million trees by 2030.
  - Establishing a £1m ‘Action Fund’ to incentivise carbon reduction and air quality improvements.
  - A £1 million energy efficiency invest to save loan fund.
  - Buying only 100% renewable electricity.
  - Generating electricity from the Javelin Park Energy from Waste facility to power around 25,000 homes a year.
  - Tender a contract to deliver over 200 new electric vehicle charging points by 2023 as part of a county-wide Electric Vehicle (EV) Strategy.
- 3.77 **Gloucestershire Local Transport Plan (LTP) 2020-2041**<sup>27</sup>: Gloucestershire LTP sets the strategic transport vision for the county to 2041. The plan sets out overarching policies and policies which address different modes of transport that are to support the spatial Connecting Places Strategies (CPS) and the Transport Scenarios, looking to 2041. Each CPS area set out priorities based on strategic, major and local schemes. The overarching vision for the LTP is a resilient transport network that enables sustainable economic growth by providing travel choices for all, making Gloucestershire a better place to live, work and visit. County-wide priorities for the plan include:
- Development of an Electric Vehicle Strategy, Climate Change Strategy and Carbon Reduction Pathway.

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<sup>25</sup> HM Government (2018) *A Green Future: Our 25 Year Plan to Improve the Environment* [online] Available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/673203/25-year-environment-plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf)

<sup>26</sup> Gloucestershire County Council (December 2019) *Gloucestershire's Climate Change Strategy*

<sup>27</sup> Gloucestershire County Council (March 2021) *Gloucestershire Local Transport Plan 2020-2041*

- Completing gaps in existing cycle networks and ensuring linkages into new strategic development sites, including improved cycle parking at key destinations.
  - Promoting sustainable travel habits for children.
  - On-street parking management systems.
  - Ongoing bus stop improvements programme.
- 3.78 **Strategic Economic Plan (SEP) for Gloucestershire 2.0**<sup>28</sup>: Produced by GFirst LEP, the Local Enterprise Partnership for Gloucestershire, the SEP 2.0 carries forward many of the priorities set out for Gloucestershire in 2014 through the first SEP. The aim is to grow the local economy by an average of 4.8% gross value added (GVA) per annum by 2022. These priorities include:
- Business environment - attracting and retaining successful businesses in high value sectors and the next generation of talented workers.
  - Skills - providing and nurturing the next generation of talented, highly employable, and productive individuals to meet the needs of local business, especially those in sectors with high growth potential.
  - Connectivity - delivering digital and integrated transport connectivity to stimulate business growth, ensuring infrastructure, regeneration and housing meet the future needs of the businesses and people of Gloucestershire.
- 3.79 **Gloucestershire Local Flood Risk Management Strategy**<sup>29</sup>: Gloucestershire County Council is the Lead Local Flood Authority for administrative area of the County. The County Council has responsibility to lead and coordinate on management of surface water runoff, ordinary watercourses and groundwater and also has increased responsibilities in relation to management of flood risk from the highway network and planning for emergencies.
- 3.80 The Gloucestershire Local Flood Risk Management Strategy sets out how the County Council aims to manage flood risk in partnership across Gloucestershire up to 2023. The strategy has mapped those areas which are most at risk of flooding, identifying areas which have less than 25%, between 25% and 50%, between 50% and 75% and over 75% susceptibility to groundwater flooding.
- 3.81 The Annual Progress and Implementation Plans to be produced annually as follow up to the strategy are to detail progress in relation to flood risk against the strategy objectives and agreed actions.
- 3.82 There are three adopted Local Plans in place to guide planning decisions on minerals and waste developments throughout Gloucestershire. These are the **Minerals Local Plan (MLP) for Gloucestershire (2018 – 2032)**<sup>30</sup>, the **Gloucestershire Waste Local Plan 2002-2012**<sup>31</sup> and the **Waste Core Strategy for Gloucestershire**<sup>32</sup>. The Waste Core Strategy was adopted in November 2012 and replaced many of the policies in the Waste Local Plan.
- 3.83 The Minerals Local Plan for Gloucestershire 2018-2032 was adopted in March 2020 with the aim of providing a clear policy framework for how mineral developments should take place across Gloucestershire. This includes the vision of the County at the start of 2033 at the end of the plan period where it is a leading county in managing its mineral resources and mineral resources will have played a key part in delivering renewal, regeneration and economic growth. The working of minerals will also have been undertaken to limit adverse impacts including those in terms of health and well-being, economic vitality of local businesses, the natural and built environment and flood risk.
- 3.84 The plan sets out seven objectives to achieve this vision. It also sets out the type of development which is to be permitted within Mineral Safeguarded Areas and Mineral Consultation Areas as well as safeguarded mineral infrastructure sites. A total of seven allocations have been made through

<sup>28</sup> Gloucestershire Local Enterprise Partnership (September 2018) *Strategic Economic Plan for Gloucestershire 2.0*

<sup>29</sup> Gloucestershire County Council (July 2014) *Local Flood Risk Management Strategy*

<sup>30</sup> Gloucestershire County Council (2018 – 2032) (March 2020) *Minerals Local Plan for Gloucestershire*

<sup>31</sup> Gloucestershire County Council (October 2004) *Gloucestershire Waste Local Plan 2002-2012*

<sup>32</sup> Gloucestershire County Council (November 2012) *Gloucestershire Waste Core Strategy*

the plan which includes five sites for the future working of sand and gravel and two sites for crushed rock limestone.

- 3.85 Gloucestershire Waste Core Strategy through Policy WCS2 seeks to *"raise awareness and positively influence attitudes and behaviour so as to reduce the amount of waste produced and ensure a greater proportion of waste is re-used."* New development in the County is expected to incorporate the principles of waste minimisation and re-use. Policy WCS6 sets out that up to 2027 development will be delivered to provide residual waste recovery capacity for up to 145,000 tonnes per year of municipal solid waste; up to 73,000 tonnes per year of commercial & industrial; and strategic residual recovery facilities to allow for up to 50,000 tonnes per year.
- 3.86 Outline boundaries for site allocations to meet the need for strategic residual recovery have been set out for:
- Wingmoor Farm East, to the south west of Bishop's Cleeve in Tewkesbury
  - The Park, to the west of Bishop's Cleeve in Tewkesbury
  - Wingmoor Farm West, to the west of Bishop's Cleeve in Tewkesbury
  - Javelin Park, to the south of Quedgeley and Hardwicke by Junction 12 of the M5 Motorway in Stroud
  - Land at Moreton Valence, to the south west of Hardwicke and to the north of Whitminster in Stroud.
- 3.87 **A Strategic Framework for Green Infrastructure in Gloucestershire 2015**<sup>33</sup>: The framework sets out a vision of green infrastructure in Gloucestershire as being enhanced, extended, promoted and managed to maximise its contribution to the natural and historic environment as well as health and well-being, the economy and quality of life including response to climate change. The contribution that green infrastructure can make to sustainable economic growth is to be achieved by giving its provision the same consideration as the delivery of other key infrastructure across the County.
- 3.88 The strategic green infrastructure principles for the County are:
- The successful connecting of functional strategic green infrastructure across the county.
  - Maximising opportunities to improve both strategic green infrastructure and more local green infrastructure whenever change is being considered.
  - Partnership working focussing co-ordination through the Local Nature Partnership and GFirst LEP to promote and enhance green infrastructure.
  - Ensuring the functional benefits of green infrastructure are understood.
  - Embedding the principles of green infrastructure in policies guiding change in the County.
  - Securing funding (for example through S106 agreements and CIL) to deliver improvements to strategic green infrastructure and individual green infrastructure projects.
  - Ensuring that the evidence to support the evaluation of different green infrastructure initiatives is robust and up to date.
- 3.89 **Gloucestershire Joint Health and Wellbeing Strategy 2020 - 2030**<sup>34</sup>: The Gloucestershire Joint Health and Wellbeing Strategy the vision of the county as a place where all people can live well, be healthy and thrive. To achieve this aim the addressing following priorities are highlighted:
- physical activity;
  - adverse childhood experiences;
  - mental wellbeing;
  - social isolation and loneliness;

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<sup>33</sup> Gloucestershire Local Nature Partnership (2015) *A Strategic Framework for Green Infrastructure in Gloucestershire 2015*

<sup>34</sup> Gloucestershire Health and Wellbeing Board (2020) *Gloucestershire Joint Health and Wellbeing Strategy 2020 - 2030*

- healthy lifestyles;
  - early years and best start in life; and
  - housing.
- 3.90 **Gloucestershire Nature Map**<sup>35</sup>: The Gloucestershire Local Nature Partnership has set out the Nature Map to identify the presence of characteristic habitats which most typify the County. At such locations habitats of these types are to be supported, expanded and appropriately linked to help promote wildlife. The Nature Map identifies landscape-scale areas as the County's wildlife Strategic Nature Areas (SNAs) in respect of Priority Habitats, which provide the best opportunity for creating and linking these key wildlife habitats. This approach is to achieve large-scale habitat restoration and creation and is expected to help deliver wide-ranging benefits for people as well as wildlife as a result of support for a range of ecosystem services.
- 3.91 **Cotswolds AONB Management Plan 2018 - 2023**<sup>36</sup>: The management plan sets out the vision, outcomes, ambitions and policies to guide the management of the AONB. The management plan is a key mechanism for achieving the purposes of conserving and enhancing the natural beauty of the AONB; and increasing the understanding and enjoyment of the AONB's special qualities. The management plan sets a vision for the AONB in 2043 as a "*Distinctive, unique, accessible living landscape treasured for its diversity which is recognised by all for its wide open views, dry stone walls, intimate valleys, flower rich grasslands, ancient woodlands, dark skies, tranquillity, archaeology, historic and cultural heritage and distinctive Cotswold stone architecture.*"
- 3.92 **2017-2027 Severn Estuary Strategy**<sup>37</sup>: The Strategy was developed by the Severn Estuary Partnership to "champion an integrated approach to the sustainable use and enjoyment of the Severn Estuary". The aims of this Strategy are to:
- Update and streamline the 2001 Severn Estuary Strategy.
  - Provide a strategic policy framework for the Severn Estuary.
  - Provide context to inform and support decision-making.
  - Facilitate the Marine & Coastal Act (2009) obligations related to cross-border integration, land-sea integration and taking an ecosystem-based approach to management.
- 3.93 The Strategy also sets out five principles for its enactment which are in keeping with the UK High-Level Marine Objectives. These are:
- Achieving a sustainable marine economy.
  - Ensuring a strong, healthy and just society.
  - Living within environmental limits.
  - Promoting good governance.
  - Using sound science responsibly.
- 3.94 **The Severn Estuary Shoreline Management Plan Review (SMP2)**<sup>38</sup>: The SMP2 sets out draft policies for how the shoreline at the Severn Estuary should be managed for the next 100 years. The plan divides the area with the estuary into 16 Theme Areas each of which is in turn divided into a number of Policy Units of more manageable sizes. Within each Policy Unit the SMP2 gives recommendations for epoch (0-20 years; 20-50 years; and 50-100 years) in terms of one of four policy options: no active intervention; hold the line; managed realignment; or advance the line.

<sup>35</sup> Gloucestershire Local Nature Partnership (Accessed: April 2018) *Gloucestershire's Natural Environment: Gloucestershire Nature Map* Online at: <http://gloucestershirenature.org.uk/actionplan>

<sup>36</sup> Cotswolds Conservation Board (September 2018) *Cotswolds AONB Management Plan 2018-2023*

<sup>37</sup> Severn Estuary Partnership (May 2017) *Severn Estuary Strategy 2017-2027*

<sup>38</sup> Atkins on behalf of Severn Estuary Coastal Group (October 2010) *The Severn Estuary Shoreline Management Plan Review (SMP2)*

- 3.95 **Severn River Basin District River Basin Management Plan**<sup>39</sup>: The management plan provides a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, the plan is to inform decisions on land-use planning. The plan highlights the areas of land and bodies of water that have specific uses that need special protection. These include waters used for drinking water, bathing, commercial shellfish harvesting and those that sustain the most precious wildlife species and habitats. The plan also sets out legally binding objectives for each quality element in every water body, including an objective for the water body as a whole with the default objective being set as achievement of a good status.
- 3.96 **Flood Risk Management Strategy**<sup>40</sup>: The Strategy is a long term plan to manage tidal flood risks in the Severn Estuary. It covers the coast from Gloucester to Lavernock Point near Cardiff and from Gloucester to Hinkley Point in Somerset. The three main objectives of the Strategy are to:
- Define a 100 year plan of investment for flood defences by the Environment Agency, National Resources Wales and local authorities.
  - Prioritise other flood risk management measures such as providing advice to utility companies to protect critical infrastructure, development control advice and flood warning investment.
  - Decide where new inter-tidal wildlife habitats should be created to compensate for losses of habitat caused by rising sea levels.
- 3.97 **Stroud District Council's 2030 Strategy**<sup>41</sup>: Confirms Stroud District Council commitment to a fast-paced target of carbon neutrality and adaptation by 2030. The 2030 vision for the District is set out over seven themes with goals relating to:
- Built Environment: the efficient use of water and power.
  - Energy: generation and distribution across the District.
  - Natural Environment: positive outcomes for all species.
  - Mobility: low carbon movement of people and goods.
  - Economy: supporting low carbon living.
  - Waste: minimising waste wherever possible.
  - Community: how we work together.
- 3.98 **Stroud Sustainable Transport Strategy**<sup>42</sup>: The Strategy was developed as part of the evidence base for the Local Plan Review for the Draft Plan stage. It sets out the vision for the District within which mobility for all is ensured, sustainable and low carbon modes of transport are prioritised, healthy and prosperous communities and economy can thrive, whilst the District continues to be environmentally responsible. The document has a number of functions:
- It sets SDC's position on a range of transport related issues and guides the formulation of updated Local Plan Policy.
  - It provides direction on the provision of transport measures which will be required to support new development.
  - It sets priorities and focus for transport investment in the District.
  - It sets the framework for delivery.
- 3.99 **Stroud District Council Health and Wellbeing Plan 2019-2021**<sup>43</sup>: The plan sets out a number of priorities to help improve the health and wellbeing of residents in the District. These are:

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<sup>39</sup> Department for Environment, Food & Rural Affairs and Environment Agency (December 2015) *Part 1: Severn River Basin District River Basin Management Plan*

<sup>40</sup> Environment Agency and National Resources Wales (Accessed April 2018) *Severn Estuary Flood Risk Management Strategy* Online at: <http://www.severnestuariespartnership.org.uk/sep/projects/severn-estuary-flood-risk-management-strategy/>

<sup>41</sup> Stroud District Council (March 2021) *The 2030 Strategy: Limiting, Adapting, Recovering and Responding in a Changing Climate*

<sup>42</sup> AECOM on behalf of Stroud District Council (November 2019) *Stroud Sustainable Transport Strategy*

<sup>43</sup> Stroud District Council (2019) *Stroud District Council Health & Wellbeing Plan 2019-2021*

- Priority 1. Supporting Healthy Lifestyles.
  - Priority 2. Developing Stronger Communities.
  - Priority 3. Improving Housing.
  - Priority 4. Protecting the Public and our Environment.
  - Priority 5. Partnering the Statutory, Voluntary and Community Sectors.
- 3.100 **Stroud District Environment Strategy 2007-2027**<sup>44</sup>: The strategy sets out the priorities for the District to 'live within environmental limits'. The priorities for Stroud have been identified as:
- Sustainable consumption and production.
  - Climate change and energy.
  - Protecting natural resources and enhancing the environment.
  - Creating sustainable communities.
  - Keeping the Council and local community focused on environmental limits.
- 3.101 **A Heritage Strategy for Stroud District**<sup>45</sup>: The strategy was adopted as supplementary planning advice for the Council in February 2018. The document seeks to achieve the positive management and conservation of the District's heritage. Concurrently, the strategy will be expected to maximise the contribution that the historic environment makes to the character of the District, its economic well-being, and the quality of life of its communities.
- 3.102 The strategy has three main objectives to ensure that the local historic environment is properly valued:
- Maximising the contribution that the historic environment makes to the character of the District, its economic well-being, and the quality of life of its communities;
  - Identifying ways to positively address the issues and pressures that are facing heritage assets; and
  - Maximising opportunities for the historic environment to help deliver the District Council's wider corporate objectives, including those of the Local Plan.
- 3.103 The Localism Act<sup>46</sup> introduced new permissive rights which included the preparation of Neighbourhood Development Plans (NDPs), Neighbourhood Development Orders and Community Right to Build Orders. NDPs must be compliance with higher level planning policy and legislation but provide local communities with tools to guide the long term growth of their area. A number of NDPs have been adopted within the District including: Eastington NDP (October 2016); Stroud NDP (October 2016); Whiteshill & Ruscombe NDP (October 2016); Hardwicke NDP (January 2017); Kingswood NDP (May 2017); Stonehouse NDP (February 2018), Dursley (February 2019) and Minchinhampton (July 2019)

## Baseline Information

- 3.104 Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues and means of dealing with them.
- 3.105 Annex 1 of the SEA Directive requires information to be provided on:
- (a) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan;*
- (b) the environmental characteristics of areas likely to be significantly affected;*

<sup>44</sup> Stroud District Council (February 2007) *Stroud District Environment Strategy 2007-2027*

<sup>45</sup> Stroud District Council (February 2018) *A Heritage Strategy for Stroud District*

<sup>46</sup> *Localism Act Care Act 2011 Chapter 3* Accessed August 2018 Online at: <http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>

(c) any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [the 'Birds Directive'] and 92/43/EEC [the 'Habitats Directive'].

- 3.106 Baseline information was previously collated for the June 2009 Local Development Framework SA Scoping Report and this has been used as the starting point to collate baseline data. This information has been revised and updated to make use of the most recent available information sources, and these sources have been referred to in footnotes. The revised and updated baseline data set out in this report reflects the scope of the Local Plan Review.
- 3.107 Data referred to have been chosen primarily for regularity and consistency of collection, in order to enable trends in the baseline situation to be established, and also subsequent monitoring of potential sustainability effects.
- 3.108 A number of changes to the baseline information presented in **Appendix 2** have been made since it was originally presented in the Scoping Report (April 2018), as a result of comments received from consultees (see **Appendix 1** for detail).

## Key Sustainability Issues

- 3.109 Analysis of the baseline information has enabled a number of key sustainability issues facing Stroud District to be identified. Identification of the key sustainability issues and consideration of how these issues might develop over time if the Local Plan Review is not implemented help to meet the requirements of Annex 1 of the SEA Directive to provide information on:
- "the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan; and any existing environmental problems which are relevant to the plan."*
- 3.110 Key sustainability issues identified in the 2013 Interim SA Report for the Stroud Local Plan (April 2013) have been reviewed and revised in light of the updated policy review and baseline information. The updated set of key sustainability issues for Stroud District is presented in **Table 3.1** overleaf.
- 3.111 A number of changes to the key sustainability issues presented in **Table 3.1** have been made since it was originally presented in the Scoping Report (April 2018), as a result of comments received from consultees (as summarised in **Appendix 1**).
- 3.112 It is also a requirement of the SEA Directive that consideration is given to the likely evolution of the environment in the plan area (in this case Stroud District) if the Local Plan Review was not to be implemented. This analysis is also presented in **Table 3.1** in relation to each of the key sustainability issues.
- 3.113 The information in **Table 3.1** shows that, in general, the current trends in relation to the various social, economic and environmental issues affecting Stroud would be more likely to continue without the implementation of the Local Plan Review, although the policies in the adopted Stroud District Local Plan (2015) would still go some way towards addressing many of the issues. In most cases, the Local Plan Review offers opportunities to directly and strongly affect existing trends in a positive way, through an up-to-date plan which reflects the requirements of the NPPF.

**Table 3.1: Key Sustainability Issues for Stroud District and Likely Evolution without the Local Plan Review**

Key Sustainability Issues for Stroud	Likely Evolution without the Local Plan Review
<p><b>Climate change</b> is likely to affect biodiversity, increase hazards from fluvial flooding and also affect the social and economic aspects of life. The rural character and dispersed nature of development in Stroud means that there are likely to be difficulties with regards the delivery of reductions in greenhouse gas emissions.</p>	<p>Climate change is likely to have on-going effects regardless of the Local Plan Review. The adopted Stroud District Local Plan already includes policies seeking to address this issue, and these would continue to apply in the absence of the Local Plan Review. These policies include Core Policy CP2: Strategic growth and development locations, which seeks to provide most of the District’s development at the most sustainable locations; ES1: Sustainable Construction and Design, which supports increased energy efficiency and integrating the use of renewable and low carbon energy sources; and ES2: Renewable or low carbon energy generation which seeks to maximise the generation of energy from renewable or low carbon sources.</p> <p>The Local Plan Review offers the opportunity to update these policies to meet the current circumstances of the District in light of new development and updated growth requirements and provide further policy to address climate change if required.</p>
<p>New development in the District will mean there will be increasing demands for <b>energy provision</b> in the future. A significant proportion (30%) of existing homes in the District require energy efficiency improvements and the District is located within the region which has the highest regional percentage of fuel poverty in England. It is noted that the percentage of homes suffering from fuel poverty in the District is slightly less than the regional percentage, however.</p>	<p>The delivery of new homes and other development over the plan period could increase demand for and energy consumption in Stroud. At present the adopted Stroud District Local Plan includes policies seeking to address this issue, and these could continue to apply in the absence of the Local Plan Review. The policies include ES1: Sustainable Construction and Design, which supports increased energy efficiency and integrating the use of renewable and low carbon energy sources; and ES2: Renewable or low carbon energy generation which seeks to maximise the generation of energy from renewable or low carbon sources.</p> <p>The Local Plan Review offers the opportunity to update these policies to meet the current circumstances of the District and provide further policy to encourage improved energy efficiency and increase the proportion of energy which is supplied by renewable sources if required.</p>
<p>Stroud District contains many areas of <b>high ecological value</b> including sites of international, national and local importance. These are under threat from urbanising pressures, including disturbance and damage from recreational use. As well as the need to avoid damage at these sites, it will be necessary to restore and enhance them where possible.</p>	<p>Pressures on the natural environment in Stroud District are likely to continue regardless of the Local Plan Review particularly given the requirement for more housing and employment development to meet growth projections and due to the effects of climate change. The adopted Stroud Local Plan (2015) already includes policies seeking to address these pressures, including ES6: Providing for biodiversity and geodiversity which safeguards internationally, nationally and locally designated biodiversity and geodiversity sites as well as protecting undesigned sites and protected sites.</p> <p>However, without the site allocations to be made through the Local Plan Review, further development may not come forward in the most appropriate locations and impacts on biodiversity could be amplified. The Local Plan review also offers the opportunity to update planning policy in relation to the protection of areas which are of importance in terms of their biodiversity and geodiversity with consideration for the future evolution</p>



Key Sustainability Issues for Stroud	Likely Evolution without the Local Plan Review
	of development in the District. The SA for the Local Plan Review will incorporate the findings of HRA which will provide further insight into biodiversity impacts specifically at European sites presenting the opportunities to limit adverse impacts at such locations.
The <b>countryside</b> is under pressure from urbanising influences which are driven by a need for new housing provision and economic growth and infrastructure improvements to support new growth in Stroud.	<p>Pressures on the countryside are likely to continue regardless of the implementation of the Local Plan Review. The adopted Stroud District Local Plan (2015) has already set out strategic growth areas, within or adjacent to larger settlements which will focus much of the new development in the District in those areas which have been subject to SA and selected by the Councils as the most sustainable and appropriate locations for development.</p> <p>However, without the new allocations to be made through the Local Plan Review, further development may not come forward in the most sustainable and appropriate locations and impacts on the countryside could be more significantly adverse.</p>
The District has significant areas of <b>landscape</b> importance, most notably to the east within the boundaries of the Cotswolds AONB.	<p>The adopted Stroud District Local Plan (2015) already includes policies to protect and enhance the landscape, including ES7: Landscape Character, which seeks to conserve and enhance the natural and scenic beauty of landscape character in the District including that of the Cotswolds AONB and its setting.</p> <p>The Local Plan Review offers the opportunity to update the current policy position in responses to the evolution of the District and development pressures it currently faces through more specific development management policies and site allocations that are selected following consideration of their impacts on landscape character through the SA. The emerging Cotswolds AONB Management Plan will provide further context to the development set out through the Local Plan Review and allow the updated pressures which the AONB is now facing to be appropriately considered.</p>
The large area of Grade 3 Agricultural Land is a significant asset to the District; however pressures from development and climate change threatened the viability and productivity of such <b>soils</b> .	<p>The pressures for new development in the District are likely to result in some development occurring in areas where high quality agricultural soils are present. The adopted Stroud District Local Plan (2015) contains policy to promote development at locations which would result in the re-use of previously developed land most notably through Core Policy CP14: High Quality Sustainable Development.</p> <p>The Local Plan Review presents the opportunity to update planning policy in the District to specifically protect higher value agricultural soils in the District in addition to promoting the re-use of previously developed land. The Local Plan Review might also be used to allocate sites for development which do not make use of higher quality agricultural soils (with consideration for the other principles of sustainable development).</p>
The River Severn and its tributaries pass through the District and these have the potential to cause serious <b>flooding</b> .	The adopted Stroud Local Plan (2015) already includes policies to reduce flood risk in the District including ES4: Water resources, quality and flood risk, which seeks to reduce flood risk in the District through appropriate siting of development, support for

Key Sustainability Issues for Stroud	Likely Evolution without the Local Plan Review
	<p>the provision of SuDS and other proposals which would reduce vulnerability to flood risk in Stroud.</p> <p>New development supported through the Local Plan Review can increase the risk of flooding; however the Local Plan Review offers the opportunity to provide development at locations which present the lowest flood risk and drafting new planning policy which will address the evolving flood risk situation in Stroud.</p>
<p>Much of the western portion of the District falls within Surface Water NVZs and/or Ground Water NVZs which indicates that different water bodies which pass through Stroud are exposed to significant levels of nitrates with a potential adverse impact on local <b>water quality</b>. Areas of the District also fall within SPZs.</p>	<p>The adopted Stroud Local Plan (2015) already includes policies seeking to protect and enhance water quality including Core Policy CP14: High Quality Sustainable Development which seeks to protect, conserve and enhance the built and natural environment including exposure to water pollution and ES4: Water resources, quality and flood risk, which seeks to maintain water quality encouraging the use of SuDS and appropriate recycling of water.</p> <p>The Local Plan Review presents the opportunity to allocate new development at sites which are less likely to have adverse impacts in terms of local water quality following their consideration through the SA process. There is also the opportunity through the Local Plan Review to include new development management policies thereby updating the planning policy position to directly address the updated water quality situation in Stroud.</p>
<p>The <b>age</b> structure of the population shows that currently there is a higher proportion of older people in the South West than nationally. There is expected to be an increasingly disproportionate number of older people in the area. This will have implications for the economy, service provision, accommodation and health.</p>	<p>The Stroud Local Plan (2015) through Core Policies CP7: Lifetime communities and CP8: New housing development expects new development to contribute to the provision of sustainable and inclusive communities meeting needs of residents including older people and also provide range of different types, tenures and sizes of housing, to create mixed communities.</p> <p>The Local Plan Review offers the opportunity to build on this policy approach through development management and site allocation policies which will help to meet the requirements of the future age structure of the District. In addition to development management policies which promote the provision of homes suitable for all sections of the community this will include the consideration of sites in terms of access to existing services centres and services and facilities through the SA process.</p>
<p>Stroud generally displays higher levels of public health than the national average however there is a requirement to address <b>health inequalities</b> as well as specific health problems such as obesity in the District.</p>	<p>Although not explicit in the adopted Stroud District Local Plan (2015), opportunities to consider access to healthcare, open spaces and other recreational facilities would have been taken into account during identification and allocation of the strategic development locations in Core Policy CP2: Strategic growth and development locations. The Local Plan Review presents further opportunities to allocate new housing development sites at locations which are in close proximity to existing healthcare facilities, open spaces and other facilities which might encourage healthier lifestyle choices including increased levels of physical activity. The Local Plan Review might also</p>

Key Sustainability Issues for Stroud	Likely Evolution without the Local Plan Review
	be used to allocate open spaces and local green spaces to protect them from development and ensure that appropriate levels of access to open space are achieved.
<p><b>House prices</b> have increased by the highest percentage within the South West when compared to the other regions of England.</p>	<p>The adopted Stroud District Local Plan (2015) seeks to increase house building to address historic undersupply and the needs of concealed households by exceeding the minimum housing requirement (11,400) set out in Core Policy CP2: Strategic Growth and Development Locations. The proportion of new development at larger sites which is to be delivered as affordable housing where viability is demonstrated is set out in the adopted Stroud District Local Plan (2015) through Core Policy CP9: Affordable housing, which requires a minimum of 30% of housing to be affordable.</p> <p>Meeting the future housing requirements identified in the new national methodology to 2036 through the Local Plan Review is intended to address national historic undersupply and resultant house price increases. Without the implementation of the site allocations to be included as part of the Local Plan Review there may be less certainty about the delivery of affordable housing at site allocations.</p>
<p>Much of the <b>housing stock</b> in the District is quite old and the worst housing conditions are most evident in the private rented sector.</p>	<p>The adopted Stroud District Local Plan (2015) through Core Policy CP2: Strategic Growth and Development Locations sets out the level of housing (11,400) and that which should be provided at the strategic sites in the District. As such the assessed need for housing is to be met up to 2031. Core Policy CP8: New housing development sets out that new housing development should be well designed to address local housing needs, incorporating a range of different types, tenures and sizes of housing. As such the current Local Plan would help to provide high quality housing to meet local need up to 2031.</p> <p>The Local Plan Review presents the opportunity to allocate housing up to 2036 to meet future requirements and to update the planning policy position to ensure that future housing provision is of the highest quality.</p>
<p>Stroud on average is one of the least deprived districts/unitary authorities in the country. However, there are <b>pockets of deprivation</b> particularly in relation to housing and service provision.</p>	<p>Without the implementation of new site allocations to be included in the Local Plan Review there may be less certainty about the delivery of housing and employment land and therefore deprivation in Stroud would be less likely to be addressed.</p>
<p><b>Economic productivity</b> in the District in terms of the GVA per hour worked indices is slightly lower than the national figure. There is a requirement to make appropriate use of the District's strong strategic transport links along the M5 corridor to facilitate future economic growth. Furthermore there is a net flow of commuters out of the District.</p>	<p>Without the implementation of new site allocations to be included in the Local Plan review there may be less certainty about the delivery of employment land and necessary transport infrastructure and therefore any potential for economic stagnation would be less likely to be addressed.</p>
<p>The <b>town centres</b> of the District face evolving pressures in terms of outside retail offers of the surrounding areas and the continued importance of e-retailing and provision of services online. Service uses and to a lesser extent comparison and convenience uses have seen a</p>	<p>The adopted Stroud District Local Plan (2015) through Policy CP12 Town centres and retailing seeks to protect and bolster the role that the District's town centres play in providing jobs and contributing to a strong local economy. This includes supporting Stroud town centre as the principal town centre with priority to be given to improving</p>

Key Sustainability Issues for Stroud	Likely Evolution without the Local Plan Review
<p>decline at many of the town centres while there has been a growth in leisure uses in recent years up to the end of 2016. There is a requirement to protect and enhance the role of town centres as economic drivers and employment supporters in a sustainable manner which is responsive to the evolving situation in Stroud.</p>	<p>retail facilities in Dursley, Stonehouse, Nailsworth and Wotton-under- Edge after this. Retail and other uses (including leisure, entertainment, cultural and tourist uses as well as other mixed-uses) that would support the vitality and viability of the centres in the hierarchy below Stroud town centre are to be directed in a sequential manner.</p> <p>The Local Plan Review presents the opportunity to incorporate updated policy to protect the evolving role of the town centres in the District. The Local Plan policy position may be updated to reflect the current strengths and opportunities at these town centres with consideration for existing weaknesses and emerging pressures to protect these centres in terms of their importance for economic growth and job provision.</p>
<p>While a high proportion of residents in the District make use of alternative modes of transport such as cycling to commute, <b>car ownership</b> in the area is high, and there are serious congestion problems in key locations. The re-establishment of the Cotswold Canals presents opportunities for the promotion of <b>alternative modes</b> of transport however there is a need to handle this sensitively.</p>	<p>The adopted Stroud District Local Plan (2015) through Core Policy CP2: Strategic Growth and Development Locations sets out development to be provided at the strategic sites in the District with development to take place in accordance with the settlement hierarchy beyond these locations. As such the adopted Local Plan seeks to guide development to locations which have been appraised as part of the SA process and are the more sustainable locations in the District. Core Policy CP13: Demand management and sustainable travel measures furthermore requires that all development is located where there are choices in modes of transport available and where the distance people need to travel is minimised. Policies EI12: Promoting transport choice and accessibility; EI13: Protecting and extending our cycle routes and EI14: Provision and protection of rail stations and halts, further help to promote sustainable transport options in the District. Policy ES11: Maintaining and regenerating the District’s canals protects the future improvement, reconstruction, restoration or continued use of the canals or towpaths in Stroud.</p> <p>The Local Plan Review presents the opportunity to incorporate support for the establishment of stronger sustainable transport links and the provision of new development at allocated sites where these links will be accessible. Furthermore the policy position of Local Plan can be updated to reflect the evolved situation of the restoration of the canals in Stroud and progress with cycling and walking capital projects.</p>
<p>The Industrial Heritage Conservation Area (IHCA) which covers 23km of the Cotswold Canals is currently one of several <b>heritage assets</b> which are included on Historic England’s Heritage at Risk list. Within the District areas of significant built historic importance and aesthetic quality are under pressure due to new development in the District and there is a requirement for them to be preserved and enhanced.</p>	<p>The adopted Stroud District Local Plan (2015) already includes policies seeking to protect and enhance the historic environment, including ES10: Valuing our historic environment and assets, which requires development to enhance the heritage significance and setting of the Districts heritage assets.</p> <p>The Local Plan Review presents the opportunity to guide new development to locations which are less sensitive in terms of their impact on heritage assets (with consideration for other sustainability issues) through the SA process applied to potential site allocations. The Local Plan Review provides a way of delivering elements of the new Heritage Strategy and will also allow for any update required to be made to the policy</p>

Key Sustainability Issues for Stroud	Likely Evolution without the Local Plan Review
<p>The District needs to capitalise further on the <b>tourism industry</b> so that this sector continues to contribute fully to economic growth. There is also a need to consider how links to the wider Cotswolds area can be made most use of profitably and how these links can be promoted. There may be opportunities to grow the tourism market at the District's town centres particularly where there are existing links to the Cotswolds AONB and Cotswolds Way. Recent years have seen a rise in the number of leisure uses at town centre locations and identified strengths at the various centres include independent cafes and shops, traditional markets and the attractive landscape setting.</p>	<p>position the Council has taken with regards the protection of heritage assets and their setting through appropriate development policies.</p> <p>The adopted Stroud District Local Plan (2015) through Policy EI10 Provision of new tourism opportunities sets out the approach to tourism development in Stroud. This is to protect and enhance landscapes and environmentally sensitive sites, whilst aiming to provide adequate facilities and enhancing enjoyment and profitability. The policy position of the current Local Plan thereby seeks to protect and enhance the functioning of the tourism sector in the District. Policy CP12 Town centres and retailing seeks to protect and bolster the role that the District's town centres play in providing jobs and contributing to a strong local economy. This includes supporting Stroud town centre as the principal town centre with priority to be given to improving retail facilities in Dursley, Stonehouse, Nailsworth and Wotton-under-Edge after this. Retail and other uses (including leisure, entertainment, cultural and tourist uses as well as other mixed-uses) that would support the vitality and viability of the centres in the hierarchy below Stroud town centre are to be directed in a sequential manner.</p> <p>The Local Plan Review presents the opportunity to provide updated development policy to guide future tourism development in light of the evolving situation in the District and the evolution of its town centres. This may include the potential to support the role of market town centres, build on current links to the Cotswolds AONB or to support development which would help to reposition the appeal of the District to attract new tourists.</p>
<p>The <b>transport infrastructure</b> is strong in the west along the M5 and A38 from north to south, although there are signs of peak congestion. The existing transport network is weaker to the east with areas of congestion prevalent. Access from east to west in the District is also limited relative to the connectivity provided from north to south.</p>	<p>The adopted Stroud District Local Plan (2015) through Core Policy CP2: Strategic Growth and Development Locations sets out development to be provided at the strategic sites in the District with development to take place in accordance with the settlement hierarchy beyond these locations. As such the adopted Local Plan seeks to guide development to locations which have been appraised as part of the SA process which is considerate of these locations accessibility and therefore to the more sustainable locations in the District.</p> <p>The Local Plan Review presents the opportunity to guide future development through new site allocations and development management policies to the more sustainable and accessible locations of the District. In this manner it will be possible for the future development in Stroud to make use of existing transport links and infrastructure which is supported through future investment plans. This approach will also help to promote the development of locations which are more accessible by the rail network, public transport and other modes of alternative transport to the benefit of location congestion issues given that these factors will be considered through the site assessment process</p>

Key Sustainability Issues for Stroud	Likely Evolution without the Local Plan Review
	and SA Report. The Local Plan Review will also present the opportunity to provide support for increased north-south and east-west connectivity where this is required.

## 4 Sustainability Appraisal findings for the Pre-submission Draft Local Plan Policies

- 4.1 This chapter presents the SA findings for the Pre-Submission Draft Local Plan. **Chapter 3** of this report has provided an overview of what the Pre-Submission Draft Local Plan contains and the order in which it is presented. This chapter presents the SA findings, mainly following the same order as the Pre-submission Draft Local Plan.
- 4.2 Changes to the order of presentation have been made to group the appraisal of the vision for the District and strategic objectives followed by the mini-visions to reflect the high level and aspirational nature of these elements of the Pre-Submission Draft Local Plan.
- 4.3 The summary SA findings for the site allocations are presented in **Chapter 5** of this report to allow for consideration of the combined effects of allocating each site in relation to both the individual parish clusters and settlements at which they lie, as well as the District as a whole.

### Priority Issues

- 4.4 The Pre-submission Draft Local Plan sets out six priority issues, identified from 40 key issues facing Stroud District, and states how the Local Plan can tackle them. The issues identified relate to:
- the 2030 carbon neutral District target;
  - the delivery of new development (including housing, employment and services/facilities);
  - the protection and enhancement of the countryside and biodiversity;
  - the use of brownfield land to contribute to housing delivery;
  - the protection of the natural environment; and
  - the provision of affordable housing.
- 4.5 As shown in **Table 4.1** below, it is expected that the Council's approach to addressing the identified priority issues for the District is likely to have mostly positive (and in many cases significant positive) effects in relation to the SA objectives.

**Table 4.1 Summary of SA findings for the Council’s approach to addressing the priority issues identified in the Stroud Local Plan Review (Pre-submission Draft)**

SA Objective	Approach to addressing the priority issues identified for the District
SA 1: Housing	++/-?
SA 2: Health	+
SA 3: Social inclusion	+
SA 4: Crime	0
SA 5: Vibrant communities	+
SA 6: Services and facilities	++
SA 7: Biodiversity/geodiversity	++
SA 8: Landscapes/townscapes	+?
SA 9: Historic environment	+?
SA 10: Air quality	++
SA 11: Water quality	0
SA 12: Flooding	+
SA 13: Efficient land use	++
SA 14: Climate change	++
SA 15: Waste	+?
SA 16: Employment	++/-?
SA 17: Economic growth	++/-?

- 4.6 Potential minor negative effects have been identified in relation to SA objectives 1: **housing**, 16: **employment** and 17: **economic growth** because the use of defined settlement boundaries within the District may limit the potential for development beyond those boundaries. This effect is uncertain dependent upon how stringently the settlement boundaries are applied. However, the overall support in this section of the Draft Local Plan for the provision of new homes (including affordable homes) and employment growth means that a significant positive effect is likely in combination with the potential minor negative effect for these three SA objectives. Employment opportunities should be more accessible in the District due to being provided specifically within the A38/M5 corridor and in tandem with housing growth. Development is also to be provided to help transform existing access to services and infrastructure which should further benefit economic growth through improved access to important transport infrastructure in the District.
- 4.7 The Council is seeking to deliver new housing development at locations which currently provide best access to services, facilities, jobs and infrastructure and would help to transform existing access to services and infrastructure. As such, a significant positive effect is expected in relation to SA objective 6: **services and facilities**. Minor positive effects are also expected in relation to SA objectives 2: **health**, 3: **social inclusion** and 5: **vibrant communities** considering that the services and facilities supported are likely to include health care, community uses and other provisions.
- 4.8 Providing development at locations which would improve accessibility to employment opportunities as well as services and facilities should help to reduce the need to travel in the District, particularly by private car. A significant positive effect is therefore expected in relation to SA objective 10: **air quality**. A significant positive effect is also expected in relation to SA objective 14: **climate change**. In addition to reducing the need to travel in the District, the Council’s approach also includes the priority of moving towards carbon neutrality by 2030. The approach to this issue acknowledges the need to adapt and improve resilience to climate change.



- 4.9 The Council's approach also supports the achievement of net gains to the natural environment as well as protecting and conserving the green infrastructure network. As such, a significant positive effect is expected in relation to SA objective 7: **biodiversity/geodiversity**. Uncertain minor positive effects are also expected in relation to SA objectives 8: **landscape/townscapes** and 9: **historic environment** given that this approach may help to protect the setting of such assets in the District, depending on the location of existing green infrastructure.
- 4.10 A significant positive effect is also expected in relation to SA objective 13: **efficient land use** given that the Council's approach is to seek to maximise the potential of brownfield and underused sites for various types of development. This includes housing, employment and canal related tourism. This approach, combined with protection of green links in the District, is likely to help retain permeable surfaces, which would be beneficial to local flood risk management. A minor positive effect is therefore expected in relation to SA objective 12: **flood risk**. Prioritising development at brownfield sites may also maximise opportunities to re-use materials and buildings already on-site, dependent upon the design of new development. A potential but uncertain minor positive effect is therefore also identified in relation to SA objective 15: **waste**.

## Vision and Strategic Objectives

- 4.11 The Pre-submission Draft Local Plan presents an overall Vision for the District for the plan period as well as six Strategic Objectives for the area. The Strategic Objectives are set out to provide a more tangible way of taking forward the overall Vision for the District. The SA findings for the Vision and Strategic Objectives presented in the Pre-submission Draft Local Plan are summarised in **Table 4.2** and described below the table.

**Table 4.2 Summary of sustainability effects for the Vision and Strategic Objectives for Stroud Local Plan Review (Pre-submission Draft)**

SA Objective	Vision	Strategic Objectives						
		SO1	SO1a	SO2	SO3	SO4	SO5	SO6
SA 1: Housing	0	++	0	0	0	0	0	0
SA 2: Health	+	++	++	0	0	+	+	0
SA 3: Social inclusion	+	++	++	0	0	0	0	0
SA 4: Crime	+	0	++	0	+	0	0	0
SA 5: Vibrant communities	+	0	0	0	0	0	0	0
SA 6: Services and facilities	+	++	0	0	++	+	0	0
SA 7: Biodiversity/geodiversity	+	0	0	0	0	0	+	++
SA 8: Landscapes/townscapes	+	0	0	0	0	0	0	++
SA 9: Historic environment	+	0	0	0	0	0	0	++
SA 10: Air quality	+	0	0	0	0	+	+	0
SA 11: Water quality	+	0	0	0	0	0	++	0
SA 12: Flooding	0	0	0	0	0	0	++	0
SA 13: Efficient land use	0	0	0	0	0	0	++	0
SA 14: Climate change	+	0	0	0	0	++	++	0
SA 15: Waste	+	0	0	0	0	0	++	0

SA Objective	Vision	Strategic Objectives						
		SO1	SO1a	SO2	SO3	SO4	SO5	SO6
SA 16: Employment	+	0	0	++	+	0	0	0
SA 17: Economic growth	+	+	0	++	+	0	0	0

### Vision

- 4.12 As shown in **Table 4.2** above, minor positive effects are expected for most of the SA objectives in relation to the Vision. This reflects the Vision's broad content and aspirational approach to achieving sustainable development in Stroud, seeking to ensure that it draws on the area's special environmental, social and economic qualities.
- 4.13 The Vision sets out that over the plan period, development in Stroud will respond to climate change by reducing the District's carbon footprint to become carbon neutral by 2030 with residents' lifestyles adapting to live within environmental limits. Minor positive effects are therefore likely in relation to SA objectives 10: **air quality**, 11: **water quality**, 14: **climate change** and 15: **waste**.
- 4.14 The Vision also states that over the plan period, the plan area will be one in which a high quality of life is enjoyed within safe, healthy, vibrant and diverse communities. These communities will have a strong sense of their own identity and local distinctiveness and provide support for vulnerable people. As such minor positive effects are also expected in relation to SA objectives 2: **health**, 3: **social inclusion**, 4: **crime**, 5: **vibrant communities** and 6: **services and facilities**.
- 4.15 In relation to the natural and built environment, the Vision sets an aspiration for Stroud to be a District in which its high-quality landscapes, flourishing wildlife and historic and cultural heritage are nurtured. A minor positive effect is therefore expected in relation to SA objectives 7: **biodiversity/geodiversity**, 8: **landscapes/townscapes** and 9: **historic environment**.
- 4.16 Additional minor positive effects are expected in relation to SA objectives 16: **employment** and 17 **economic growth**. It is envisaged that within the District, the complementary role of the market towns, wider regional centres and rural hinterlands will contribute to the sustainable and thriving local economy. The Vision text also makes specific reference to exploiting Stroud's position within the high tech, green technology, creative industries and tourism.
- 4.17 Due to the Vision's high level and general aspirations, it is not anticipated that any significant positive effects are likely in relation to the SA objectives. The Local Plan's more detailed policies will support the outcome of this Vision. These policies have been appraised separately in this chapter.

### Strategic Objectives

- 4.18 A large number of negligible effects have been identified in relation to the Local Plan Strategic Objectives as they are quite specific in terms of the subject matter covered by each. However, a number of positive effects from the strategic objectives have been identified where they relate to specific SA objectives.
- 4.19 Significant positive effects are identified when the aim of the Strategic Objective directly aligns with that of the SA objective, as outlined below:
- Strategic Objective SO1 addresses the maintenance and improvement of access to services and amenities in Stroud particularly in relation to healthcare provision, affordable and decent housing, recreation opportunities and learning opportunities. Therefore, this strategic objective is likely to have significant positive effects in relation to SA objectives 1: **housing**, 2: **health**, 3: **social inclusion** and 6: **services and facilities**. A minor positive effect is also expected in relation to SA objective 17: **economic growth** given that the support for education facilities within the District is likely to help promote its attractiveness to potential investors by contributing positively to educational attainment.

- Strategic Objective SO1a addresses the promotion of healthy, inclusive and safe communities in the District. This includes support for healthy lifestyles, the promotion of social interaction, ensuring public safety and reducing the fear of crime in the District. Therefore, this strategic objective is likely to have significant positive effects in relation to SA objectives 2: **health**, 3: **social inclusion** and 4: **crime**.
- Strategic Objective SO2 addresses the local economy and provision of jobs in Stroud, including the enhancement of skills for residents. Therefore, this strategic objective is likely to have significant positive effects in relation to SA objectives 16: **employment** and 17: **economic growth**.
- Strategic Objective SO3 addresses the need to improve town centres in Stroud as well as linking them to their rural hinterlands, including improving their safety, vitality and viability. Therefore, this strategic objective is likely to have a significant positive effect in relation to SA objective 6: **services and facilities** given that it should help to improve access to these types of provisions, and a minor positive effect on SA objective 4: **crime**. Furthermore, this strategic objective is expected to have minor positive effects in relation to SA objectives 16: **employment** and 17: **economic growth** given that it is likely to address the sub-objectives of supporting the prosperity of the District's rural economy and maintaining the economic vitality and vibrancy of the District's town centres.
- Strategic Objective SO4 addresses the need to promote alternative modes of transport, thereby reducing reliance on travel by private car while also seeking to reduce carbon emissions by using new technologies. The move towards a more integrated transport system is also to help improve access to local goods and services. Therefore, this strategic objective is likely to have a significant positive effect in relation to SA objective 14: **climate change** and minor positive effects in relation to SA objectives 2: **health**, 6: **services and facilities** and 10: **air quality**. It is likely that the move towards alternative and healthier modes of transport as part of a more integrated transport system would help to improve health and well-being in the District and should also help to reduce adverse impacts relating to air quality while improving access to services and facilities as part of an overall trend towards increased connectivity in Stroud.
- Strategic Objective SO5 addresses the need to adapt to climate change and respect environmental limits within the District. This is to include securing zero carbon development through more efficient building design in Stroud, encouraging patterns of development which support the use of sustainable transport, promoting the re-use of buildings and brownfield land and minimising waste production as well as encouraging energy recovery from these sources. This strategic objective also addresses the maintenance and enhancement of the green infrastructure network and flood risk and the protection of water resources in Stroud. Therefore, this strategic objective is likely to have significant positive effects in relation to SA objectives 11: **water quality**, 12: **flooding**, 13: **efficient land use**, 14: **climate change**, and 15: **waste**. It is likely that encouraging the use of sustainable modes of transport in the District will help to mitigate adverse impacts that development over the plan period could have in terms of air quality and as such a minor positive effect is expected in relation to SA objective 10: **air quality**.
- The improvements to the District's green infrastructure network encouraged in Strategic Objective SO5 are likely to provide habitats for wildlife. Such spaces also allow residents to appreciate wildlife and provide areas for recreation. Therefore, minor positive effects are expected in relation to SA objectives 2: **health** and 7: **biodiversity/geodiversity**.
- Strategic Objective SO6 addresses the need to protect and enhance the distinctive qualities of the District, including those relating to landscape, heritage, townscape and biodiversity. Therefore, this strategic objective is likely to have significant positive effects in relation to SA objectives 7: **services and facilities**, 8: **landscapes/townscapes** and 9: **historic environment**.

## Strategies and 'Mini-visions' for the parish clusters

- 4.20 The Pre-submission Draft Local Plan contains eight strategies and 'mini-visions' relating to distinct parts of the District. The overarching strategy for each parish cluster area is high level and is supported by an aspirational mini-vision of what the area will look like in 2040. Many of the adverse effects of development (including those relating to land take, impacts on sensitive environmental receptors and increased human activities) will result from the development of individual sites. These have been appraised separately in **Chapter 5** of this SA Report.
- 4.21 Given their high level and aspirational nature, the strategies and mini-visions for each parish cluster area are expected to have mostly minor positive or negligible effects in relation to the SA objectives as shown in **Table 4.3** overleaf. No significant effects (either positive or negative) are expected.

**Table 4.3 Summary of SA effects for parish cluster strategies and 'mini visions' in the Stroud Local Plan Review (Pre-submission Draft)**

SA Objective	Strategy and 'mini vision' for each parish cluster							
	Stroud Valleys	Stonehouse cluster	Cam and Dursley	Gloucester's rural fringe	Berkeley cluster	Severn Vale	Wotton cluster	Cotswold cluster
SA 1: Housing	+	+	+	+	+	0	0	+
SA 2: Health	+	+	+	0	+	+	0	0
SA 3: Social inclusion	+	0	+	+	+	0	+	+
SA 4: Crime	0	0	0	0	0	0	0	0
SA 5: Vibrant communities	+	+	+	+	+	0	+	+
SA 6: Services and facilities	+	+	+	+	+	+	+	+
SA 7: Biodiversity/geodiversity	+	+	+	0	+	+	0	0
SA 8: Landscapes/townscapes	+	+	+	+	+	+	+	+
SA 9: Historic environment	+	0	+	+	+	+	+	+
SA 10: Air quality	+	+	+	+	+	+	+	0
SA 11: Water quality	0	0	0	0	0	0	0	0
SA 12: Flooding	0	0	0	0	+	+	0	0
SA 13: Efficient land use	0	0	0	+	0	0	0	0
SA 14: Climate change	+	+	+	+	+	+	+	0
SA 15: Waste	0	0	0	+	0	0	0	0
SA 16: Employment	+	+	+	+	+	0	+	+
SA 17: Economic growth	+	+	+	+	+	+	+	+

### The Stroud Valleys

- 4.22 The mini-vision for the Stroud Valleys states that Stroud Town will act as a focal point for communities and visitors and that the Stroud Valleys will cater for growth in residential capacity in the region. Walking and cycling links are to be improved as part of the vision up to 2040 which is likely to help encourage more active lifestyles among residents. Minor positive effects are therefore expected in relation to SA objectives 1: **housing**, 2: **health**, 3: **social inclusion** and 5: **vibrant communities**.
- 4.23 Reference is made in the vision to creating a thriving environment for businesses and industry as well as for leisure and retail facilities. Future development of this type is likely to be supported by improved transport links in the area, which is also part of the vision. Minor positive effects are therefore expected in relation to SA objectives 6: **services and facilities**, 16: **employment** and 17: **economic growth**.
- 4.24 Minor positive effects are also expected in relation to SA objectives 7: **biodiversity/geodiversity**, 8: **landscapes/townscapes** and 9: **historic environment**. The vision states that Minchinhampton and the smaller villages within the Cotswolds AONB will continue to flourish set within a valued and protected landscape. Furthermore, it is highlighted that regeneration of the industrial valley bottoms and the restoration of the Cotswold Canals will enhance the valleys' rich architectural heritage, while habitats along river corridors will be enhanced and better connected. The vision also states that the special qualities of the wildlife-rich grasslands, ancient woodlands and commons will be protected.
- 4.25 The mini-vision also states that access to public modes of transport will be improved, which may be of benefit in terms of reducing CO<sub>2</sub> emissions and improving air quality. As such, minor positive effects are expected in relation to SA objectives 10: **air quality** and 14: **climate change**.
- 4.26 The strategy for the Stroud Valleys includes the local site allocations PS01, PS02 (at Brimscombe and Thrupp), PS05 (at Minchinhampton, including PS05a which is safeguarded with potential to meet the future housing needs of Minchinhampton), PS06 (at Nailsworth), PS10, PS11, PS12 and STR065 (at Stroud). The likely sustainability effects of allocating these sites for development are described in **Chapter 5**.

### The Stonehouse cluster

- 4.27 Minor positive effects are expected for the mini-vision for the Stonehouse cluster in relation to SA objectives 1: **housing** and 5: **vibrant communities**. This is because the vision states that communities are to have the chance to help shape their neighbourhoods to ensure that valued characteristics of the area are protected and enhanced, maintaining their distinct identities. It is also stated that residential areas will continue to be well-balanced, with access to services for young and old at settlements such as Eastington and The Stanleys.
- 4.28 It is envisaged that there will be greater opportunities for all residents to access 'green links' for walking or cycling between the town centre and the surrounding area. Furthermore, it is also envisaged that there will be a new rail station at Bristol Road in Stonehouse. This approach may help to promote healthier lifestyle choices among residents and encourage travel by more sustainable modes. Minor positive effects are therefore expected in relation to SA objectives 2: **health**, 10: **air quality** and 14: **climate change**.
- 4.29 The mini-vision for the Stonehouse cluster states that development to the west of Stonehouse at Great Oldbury will expand the existing Oldends/Stroudwater employment area. It is envisaged that improvement to transport infrastructure in the area will also contribute to the sustainability of this employment area, and is also likely to help improve access to services and facilities in the area. The growth of a new employment area close to the M5 Junction 13 will also reinforce the town's role as one of the District's most important employment hubs. Therefore, minor positive effects are expected in relation to SA objectives 6: **services and facilities**, 16: **employment** and 17: **economic growth**.
- 4.30 The vision also aims that enhancement of the river corridor and canal will boost the tourist economy in the region, whilst also providing valuable amenities to residents. The vision suggests this will be supported by an increased presence of transport links between the town centre and

more rural areas, including to the Cotswold Way. As such minor positive effects are expected in relation to SA objectives 7: **biodiversity/geodiversity**, 8: **landscapes/townscapes** and 17: **economic growth**.

- 4.31 The strategy for the Stonehouse cluster includes the local site allocations PS16, PS42 (at Leonard Stanley) and PS17 (at Stonehouse). It also includes the strategic site allocations PS19a and PS20 (at the north west and west of Stonehouse). The likely sustainability effects of allocating these sites for development are described in **Chapter 5**.

### Cam and Dursley

- 4.32 The mini-vision for Cam and Dursley explains that the role of these settlements in the southern part of Stroud District will be enhanced by developing improved infrastructure and increasing the offer of employment opportunities, as well as facilities and services. It is also set out in the vision that there will be greater access to the countryside for the leisure, recreation and amenities it provides local residents. The close links of the area to the Cotswold Way National Trail and to other visitor attractions will help to increase levels of tourism. As such, minor positive effects are expected in relation to SA objectives 2: **health**, 3: **social inclusion**, 5: **vibrant communities**, 6: **services and facilities**, 16: **employment** and 17: **economic growth**.
- 4.33 Minor positive effects are also expected in relation to SA objectives 7: **biodiversity/geodiversity**, 8: **landscapes/townscapes** and 9: **historic environment**. The vision sets out that within Cam and Dursley, the valued landscape setting and attractive, wildlife-rich local environment will be conserved. The heritage assets of the local area are to be protected and promoted.
- 4.34 Minor positive effects are also expected in relation to SA objectives 10: **air quality** and 14: **climate change**. The vision states that Cam will benefit from an improved centre with good pedestrian and cycle connectivity. There will also be a strengthening of walking and cycling routes between Cam, Dursley and Uley. This may be of benefit in terms of reducing carbon emissions and air quality and encourage more active lifestyle choices among residents, reinforcing the minor positive effect already identified for SA objective 2: **health**.
- 4.35 The strategy for Cam and Dursley includes the strategic site allocations PS24 and PS25 (at the west and north west of Cam), as well as the local site allocations PS27 and PS28 (at Dursley). The likely sustainability effects of allocating these sites for development are described in **Chapter 5**.

### Gloucester's rural fringe

- 4.36 The mini-vision for Gloucester's rural fringe sets out that a southern extension to Hardwicke village will provide a local centre and additional community provision. Hunts Grove is to grow into a sustainable new community where there is nearby access to jobs. The area is to benefit from improvements to transport and infrastructure. The vision also states that there will be employment development at Junction 12 of the motorway. Javelin Park is expected to stimulate the development of business opportunities on surrounding employment sites. Minor positive effects are therefore expected in relation to SA objectives 1: **housing**, 5: **vibrant communities**, 6: **services and facilities**, 16: **employment** and 17: **economic growth**.
- 4.37 It is also stated in the vision that the distinctive characteristics of rural parishes in the area will be maintained to reflect the Cotswold's AONB status and protect its setting. It is suggested this will mean minimal development will occur outside of the identified 'strategic locations'. There will also be limited development beyond the motorway which is to represent a distinct and defensible limit to southerly expansion, with the exception of employment development at Junction 12. As such, minor positive effects are expected in relation to SA objectives 8: **landscapes/townscapes** and 13: **efficient use of land**. The preservation of local and more rural parishes in their current state may result in a minor positive effect in relation to 9: **historic environment**. The overall approach taken for the fringe area includes a sympathetic approach to development at the village of Hardwicke. The village is to benefit from a southern extension while development will ensure the protection of the character of the village and sense of community in the area.
- 4.38 The vision states that Javelin Park will also offer the potential to make use of waste heat from the incinerator. Furthermore, the provision of a new village centre at Hunts Grove is expected to

encourage the growth of a sustainable new community which is likely to help reduce the need to travel in the District. As part of the improved transport infrastructure, the area is to benefit from improvements to cycle and pedestrian links. Therefore, minor positive effects are also expected in relation to SA objectives 10: **air quality**, 14: **climate change** and 15: **waste**.

- 4.39 The strategy for Gloucester's rural fringe includes the local site allocation HAR017, the strategic site allocations PS30 and G1 and the employment site allocations PS32 and PS43 (all of which are at Hardwicke and Hunts Grove). Site G2 (at Whaddon) does not currently form part of the Draft Local Plan's development strategy for meeting Stroud District's needs, but is safeguarded to meet the future housing needs of Gloucester City should it be required and provided it is consistent with the approved strategy of the Joint Core Strategy Review. The likely sustainability effects of allocating these sites for development are described in **Chapter 5**.

### The Berkeley cluster

- 4.40 The mini-vision for the Berkeley cluster sets out that development of new communities at Sharpness and Wisloe Green will help to meet the housing and employment needs of the District. It is also stated in the vision that transport links at these settlements and Berkeley town will be improved to support the growth of new communities. Development at Sharpness and Wisloe is also to be supported by the provision of new services and facilities. Established communities will also have the chance to shape their neighbourhoods, maintaining their distinct identities and enhancing aspects of the area that make it a pleasant place to live. As such, minor positive effects are expected in relation to SA objectives 1: **housing**, 3: **social inclusion**, 5: **vibrant communities** and 6: **services and facilities**.
- 4.41 Minor positive effects are also expected in relation to SA objectives 7: **biodiversity/geodiversity**, 8: **landscapes/townscapes** 9: **historic environment** and 12: **flooding**. It is envisaged that the new communities at Sharpness and at Wisloe Green are to be delivered in line with Garden City principles for high quality design within a green setting. It is also stated in the vision that the protection of the area's distinct built heritage, estuarine landscape and habitats will remain a priority. Specific reference is included relating to a variety of attractions which may help to raise the profile of this part of the District. While the vision identifies that the conservation of these features will be a priority, resilience to climate change and associated flood risk will also form part of the approach to the management of the area.
- 4.42 The vision states that there will be enhancement of walking and cycling routes in the region to link settlements together which is expected to benefit not only air quality and greenhouse gas emissions but also health and wellbeing. Public transport is expected to be boosted by the delivery of the new settlement at Wisloe. Improved sustainable transport links will be provided along the A38 corridor connecting Stone, Newport, Slimbridge and Cambridge to Bristol and Gloucester. Furthermore, it is envisaged that sustainable transport will also be boosted by the reopening of the Sharpness rail branchline to passenger and tourism services and the enhancement of access to Cam and Dursley rail station. Small-scale local businesses will also be encouraged across the area and this type of growth will be supported by farm diversification and low-impact tourism related activities. As such, minor positive effects are expected in relation to SA objectives 10: **air quality**, 14: **climate change**, 16: **employment** and 17: **economic growth**.
- 4.43 The strategy for the Berkeley cluster includes the local site allocations PS33, BER016/017 (at Berkeley) and PS35 (at Newtown and Sharpness). It also includes the strategic site allocations PS34 (Sharpness Docks), P36 (Sharpness new settlement) and PS37 (Wisloe new settlement). The likely sustainability effects of allocating these sites for development are described in **Chapter 5**.

### The Severn Vale

- 4.44 The mini-vision for the Severn Vale sets out that the network of walking, cycling and water-borne routes around the Saul Junction will be enhanced. This is to be instrumental to support access to a restored Stroudwater Navigation. The vision text suggests that the restoration of the canal will be of environmental and economic benefit to local residents, as well as having a variety of health and well-being benefits. Protection of estuarine habitats, resilience to climate change and the associated flood risk in these areas are also included as priorities in the vision. As such, it is



expected that there will be minor positive effects in relation to SA objectives 2: **health**, 7: **biodiversity/geodiversity**, 12: **flooding**, 14: **climate change** and 17: **economic growth**.

- 4.45 It is also stated in the mini-vision for Severn Vale that the relationship with the River Severn is to remain a key aspect of land use decisions. The important contribution this feature makes to the region's special character is also recognised. In light of this, it is set out that growth within this area will not be 'strategic', with development of a smaller scale to be supported. Maintaining and improving public transport, accessibility and services will remain key aims for the communities of the Severn Vale. The conservation of heritage assets will also be a high priority. Minor positive effects are therefore expected in relation to SA objectives 6: **services and facilities**, 8: **landscapes/townscapes**, 9: **historic environment**, 10: **air quality**, 12: **flooding** and 14: **climate change**.
- 4.46 The strategy for Severn Vale includes the local site allocations PS44 (at Frampton on Severn), PS45 and PS46 (at Whitminster). The likely sustainability effects of allocating these sites for development are described in **Chapter 5**.

### The Wotton cluster

- 4.47 The mini-vision for the Wotton cluster highlights that given restrictions on further outward growth, development of Wotton-under-Edge will be limited mainly to meeting the needs of the surrounding rural communities. Furthermore, development within the smaller settlements is to be limited to being of a small scale and will be in response to local needs. The vision also states that meeting local needs will also involve strong community engagement in the planning of events, festivals and leisure facilities. The settlements of Wotton-under-Edge and Kingswood will continue to be set within attractive landscapes with the former maintained as a noted historic town. It is therefore expected that there will be minor positive effects in relation to SA objectives 3: **social inclusion**, 8: **landscapes/townscapes** and 9: **historic environment**.
- 4.48 The mini-vision for the Wotton cluster includes a key objective for the area to improve access to services and facilities and jobs for residents in parishes in the Wotton-under-Edge area. This approach is to be supported by improving public transport links and the revitalisation of Dursley and its town centre. The vision also states that the area will benefit from pleasant and safe green walking and cycling links that connect Kingswood, Wotton-under-Edge, Charfield and other key local destinations. The vision is therefore expected to have minor positive effects in relation to SA objectives 5: **vibrant communities**, 6: **services and facilities**, 10: **air quality**, 14: **climate change**, 16: **employment** and 17: **economic growth**.
- 4.49 The strategy for the Wotton cluster includes the local site allocation PS38 and employment site allocation PS47 (both at Kingswood). The likely sustainability effects of allocating these sites for development are described in **Chapter 5**.

### The Cotswold cluster

- 4.50 The mini-vision for the Cotswold Cluster states that development will be limited mainly to Painswick to meet the housing needs of the area as well as improve the vitality of the town centre and local services. Smaller scale development is also to be supported at the smaller villages in this part of the District to respond to locally-identified needs. It is also set out in the vision that the Cotswold 'brand' is of key importance economically to the region, making it important to cater to high quality tourism needs that are in line with the relative affluence of the region. However, the vision also explains that inclusiveness in this area is important so that all residents feel the benefits of increased tourism. Furthermore, the vision sets out that rural businesses have a valued role in providing local employment opportunities for the area. As such, minor positive effects are expected in relation to SA objectives 1: **housing**, 3: **social inclusion**, 5: **vibrant communities**, 6: **services and facilities**, 16: **employment** and 17: **economic growth**.
- 4.51 The vision states that preservation of the area's landscape and heritage assets will be of great importance and that it will be necessary to find a balance in the region between the needs of residents, tourists and the area's role as a 'protected landscape'. As part of this balance, the preservation and enhancement of the area's landscape, character and built heritage is considered to be of great importance. As such, minor positive effects are expected in relation SA objectives 8: **landscapes/townscapes** and 9: **historic environment**.

- 4.52 The strategy for the Cotswold cluster includes the local site allocation PS41 (at Painswick). The likely sustainability effects of allocating this site for development are described in **Chapter 5**.

### Settlement boundaries

- 4.53 The Pre-submission Draft Local Plan continues the current approach of defining settlement development limits at Tier 1 to Tier 4 settlements within each of the parish clusters of the District. These have been reviewed and changes have been made to some boundaries to reflect physical changes and to better reflect their intended function. Minor changes to settlement boundaries have been presented by individual settlement, highlighted within the parish cluster section of the Pre-submission Draft Local Plan. Further detail is provided in Appendix A of the document for the changes to the settlement development limits relating to Berkeley, Cam, Cambridge, Dursley, Eastington, Hardwicke, Hillesley, Horsley, King Stanley, Leonard Stanley, Middledy, Miserden, Newtown and Sharpness, Stonehouse, Stroud, Uley, and Whitminster. Changes to the settlement development limits at Coaley, Kingswood, South Woodchester and Whitminster, which are over and above those included in the Draft Local Plan (November 2019), are to be made through the Pre-submission Draft Local Plan to respond to public consultation and the Council's evidence base. Changes to these settlement development limits reflect recent development completed since the Draft Local Plan consultation in 2019.
- 4.54 The Pre-submission Draft Local Plan allows for a degree of flexibility, with a limited amount of development to be supported beyond the defined settlement boundaries at designated Tier 3b and Tier 4 settlements to meet identified local needs provided that detailed environmental and design criteria are satisfied and development is supported by the relevant Parish Council. The development strategy set out for each individual settlement (including the approach to development within and adjacent to the settlement development limits) aligns with the tier each settlement has been assigned as set out in Core Policy CP3 of the Pre-submission Draft Local Plan. Policy CP3 sets out the approach to the settlement development limits and settlement hierarchy in Stroud. The appraisal of this policy is presented later in this chapter.

### SA Findings for the Pre-submission Draft Local Plan Policies: proposed development strategy

- 4.55 The Pre-submission Draft Local Plan contains six Core Policies which are the principal means of defining and delivering the plan's proposed development strategy.
- 4.56 The likely sustainability effects of these policies (Core Policy DCP1 and Core Policies CP2 to CP6) are set out below.

**Table 4.4 SA findings for the policies relating to the proposed development strategy**

SA Objective	DCP1 – Delivering Carbon Neutral by 2030	CP2 – Strategic growth and development locations	CP3 – Settlement Hierarchy	CP4 – Place making	CP5 – Environmental development principles for strategic sites	CP6 – Infrastructure and developer contributions
SA 1: Housing	+	++	++	+	0	+
SA 2: Health	+	++/-	++	+	+	+
SA 3: Social inclusion	0	+/-	+	0	0	0
SA 4: Crime	0	0	0	+	0	0
SA 5: Vibrant communities	+	+/-	+	++	+	+
SA 6: Services and facilities	+	++/-	++	0	+	+
SA 7: Biodiversity/geodiversity	++	--?	--?	+	+	0
SA 8: Landscapes/townscapes	+	--?	+/-?	+	+	0
SA 9: Historic environment	0	+?/--?	+/-?	+	+	0
SA 10: Air quality.	++	+/-	+	+	+	+/-
SA 11: Water quality	+	-	-	0	+	0
SA 12: Flooding	+	+/-	-	0	+	0
SA 13: Efficient land use	0	+/-	+	0	+	0
SA 14: Climate change	++	+/-	+	+	++	+/-
SA 15: Waste	+	+	+	+	+	0
SA 16: Employment	0	++/-	++/-	+	0	0
SA 17: Economic growth	0	++/-	++/-	0	0	+

**Policy DCP1: Delivering Carbon Neutral by 2030**

- 4.57 Policy DCP1 sets out criteria for new development that will contribute to achieving carbon neutrality within the District by 2030, which is ahead of the Government target of net zero carbon by 2050. Due to the ambition of the target and its comprehensive approach to emission reduction, a significant positive effect is expected for the policy in relation to SA objective 14: **climate change**.
- 4.58 The strategy for reducing carbon emissions broadly aligns with the steps that are likely to help achieve improved air quality in the District. As such, a significant positive effect is also expected for the policy in relation to SA objective 10: **air quality**. Among the most significant of the policy's criteria is a requirement that development must be located where it will minimise the need to travel, either through close proximity to essential services and facilities or through the actual layout of the development itself. Aside from the benefits in terms of mitigating climate change and reducing air pollution, there is potential for this requirement to ensure that residents within new developments can satisfy everyday needs within close proximity. As such, a minor

positive effect is also expected for the policy in relation to SA objective 6: **services and facilities**.

- 4.59 When travel is necessary, the policy requires that walking, cycling and public transport use are prioritised in order to reduce private car use (irrespective of fuel source). This could increase the uptake of active travel amongst residents as a means of accessing services and facilities or commuting to work. As such, a minor positive effect is expected for the policy in relation to SA objective 2: **health**. A community in which there is less private car travel may result in positive effects relating to reduced noise pollution, air pollution and light pollution. This could improve the overall satisfaction of resident with the area in which they live in and therefore a minor positive effect is expected for the policy in relation to SA objective 5: **vibrant communities**.
- 4.60 The policy also promotes the enhancement of green infrastructure in the District due to its potential to sequester carbon and support local food production. This support for green infrastructure is likely to benefit wildlife and may provide opportunities for landscape enhancement. As such, positive effects are also expected for the policy in relation to SA objectives 7: **biodiversity/geodiversity** and 8: **landscapes/townscapes**. The biodiversity benefits of the policy are strengthened by requirements that nature recovery is a consideration in delivery of green infrastructure and that development should be designed to establish coherent and resilient ecological networks. Therefore, the positive effects identified for SA objective 7 are expected to be significant. Green infrastructure can also have benefits in terms the water environment by limiting run off into water courses and helping to increase the absorption of rainwater into soils. Additionally, the policy requires that development should be located and designed to reduce flood risk. As such, minor positive effects are also expected in relation to SA objectives 11: **water quality** and 12: **flooding**.
- 4.61 The policy also seeks to reduce carbon emissions through the incorporation of energy efficiency measures and low carbon/renewable energy in new developments, to the highest achievable standards. This will contribute positively to the District's carbon neutrality targets and also offers residents the opportunity to live in sustainable homes. As such, a minor positive effect is expected for the policy in relation to SA objective 1: **housing**.
- 4.62 The promotion of a circular economy is also encouraged through the policy by a requirement that new development should be designed to reduce waste in accordance with the waste hierarchy. A minor positive effect is therefore expected for the policy in relation to SA objective 15: **waste**.

### **Policy CP2: Strategic growth and development locations**

- 4.63 Policy CP2 sets out the strategy for delivering the level of development to meet the objectively assessed needs of the District between 2020 and 2040. The SA Report has tested a number of reasonable alternatives for the strategy. Initially four potential growth options were set out in the Issues and Options consultation paper (October 2017), which covered a concentrated development approach, wider distribution, dispersal and a new growth point. The SA of these four options was presented to the Council in an internal summary note in August 2018. This work was considered by the Council when making decisions on which options to take forward in the Preferred Options ("Emerging Strategy") Local Plan (November 2018). The appraisal findings were then presented in the SA Report (November 2018) which was published alongside that version of the Local Plan.
- 4.64 This work recommended that the Council should consider a hybrid option of the options put forward at that time which would most resemble a 'concentrated development' approach (Option 1) but also including growth at one or two growth points and/or one or two of the smaller towns and larger villages as well. The hybrid option taken forward by the Council was subsequently appraised in the November 2019 SA Report (through the appraisal of Policy CP2) which was published for consultation alongside the Draft Local Plan (November 2019).
- 4.65 The Council subsequently considered four additional options for the growth strategy to be included in the Pre-submission Draft Local Plan document. These additional options built on the hybrid option presented in the Draft Local Plan (November 2019) and considered options for meeting the potential increased housing requirement over the plan period. They also reflected the potential need to identify additional reserve sites, to ensure a suitable portfolio of sites is identified, thereby guaranteeing the delivery of housing at the rates required up to 2040.

- 4.66 The appraisal of the four initial options and the hybrid option as well as the four additional options for the growth strategy were presented together in the SA Report for the Additional Housing Options (October 2020). The summary of the appraisal findings for the four initial options alongside the hybrid option and the four additional options for the growth strategy are re-presented in **Appendix 8** of this SA Report. The appraisal work for these options in **Appendix 8** is 'policy-off'; i.e. it does not reflect any of the requirements for development which are detailed in the relevant policy (Policy CP2) which sets the strategy for delivering development in the plan area.
- 4.67 Policy CP2 requires the delivery of at least 9,065 new dwellings (in addition to existing firm commitments totalling 4,595 dwellings) at a number of locations in the District. This will ensure that the District's housing needs of 12,600 dwellings or 630 dwellings per annum up to 2040 will be met. A large proportion of growth is to be directed to Tier 1 settlements and the new settlements at Sharpness (2,400 dwellings over the plan period and 5,000 dwellings by 2050) and Wisloe (1,500 dwellings). This will meet the housing needs of the District over the period 2020-2040, as identified through the Gloucestershire Local Housing Needs Assessment. As such, a significant positive effect is expected for the policy in relation to SA objective 1: **housing**. The policy will also help to address the unmet housing need of Gloucester City by providing 3,000 dwellings at Whaddon, subject to the need and location being consistent with the approved strategy for the Joint Core Strategy Review. It is likely that providing housing at larger strategic sites will support the delivery of affordable homes in the plan area. The inclusion of housing at smaller sites will allow for housing developments which can achieve faster completion rates.
- 4.68 Directing much of the strategic growth to Tier 1 settlements (Cam and Stonehouse) as well as to the Gloucester fringe area is likely to ensure that most new residents will have a good level of access to existing healthcare facilities and areas of open space, as well as education facilities and cultural facilities. Opportunities to walk or cycle to access services and facilities and employment opportunities are also likely to be greater in those areas. In contrast, strategic growth at new settlements (Sharpness and Wisloe) could leave new residents without immediate access to a wide range of existing services and facilities during the early stages of development. The critical mass provided is likely to support the delivery of new services and facilities as well as the delivery of supporting infrastructure through S016/CIL contributions, which will help to satisfy the needs of residents once the sites are built out. The smaller settlements provide access to a more limited range of services and facilities; however, these locations are only to accommodate a smaller amount of growth over the plan period. Where this development is delivered there is potential for new residents to make use of existing services thereby supporting their viability. As such, mixed effects (significant positive and minor negative) are expected for the policy in relation to SA objectives 2: **health** and 6: **services and facilities**.
- 4.69 Similar mixed effects are expected for the policy in relation to SA objectives 3: **social inclusion** and 5: **vibrant communities**. By providing high amounts of growth at Tier 1 settlements and in large new settlements, issues of access are less likely to emerge for much of the local population including for older people and those with disabilities. It is noted, however, that where new settlements are provided from 'scratch', the timing of delivery of new services and facilities will influence access to these types of provisions for new residents. At rural locations, access to service provision is likely to be more limited, although the smaller amount of development to be provided at these locations could help support longer term rural service provision. Furthermore, limiting growth in areas which are currently less developed is likely to help protect more sensitive community networks. As such, mixed (minor positive and minor negative) effects are expected for the policy in relation to SA objectives 3 and 5.
- 4.70 The policy is expected to have a negligible effect in relation to SA objective 4: **crime**. The effects of new development in relation to the incidences and fear of crime are likely to depend on detailed development design rather than the overall quantum and spatial distribution of growth.
- 4.71 The policy supports the delivery of a large amount of housing and employment development across the District, which will result in the loss of large areas of greenfield land which could be of value in terms of habitat provision and connectivity. In particular, the delivery of 2,400 dwellings at Sharpness and 300 dwellings at Sharpness Docks is in close proximity to the Severn Estuary SSSI/SPA/SAC/Ramsar site and therefore there is potential for adverse impacts on these internationally designated sites. Development within the Stroud Valleys (including at Stroud and Brimscombe and Thrupp) has the potential to place additional recreational pressures on

Rodborough Common SAC. As such, a significant negative effect is expected for the policy in relation to SA objective 7: **biodiversity/ geodiversity**. The effect is uncertain as it will depend in part on the detailed development design and layout.

- 4.72 The HRA for the plan<sup>47</sup> identified likely significant effects for the overall quantum of growth set out in the Pre-submission Draft Local in relation to recreation for the Cotswolds Beechwoods SAC, Rodborough Common SAC and the Severn Estuary SAC/SPA/Ramsar site. The overall quantum of growth was also identified to have likely significant effects in relation to water issues for the Severn Estuary SAC/SPA/Ramsar and air quality for Cotswolds Beechwoods SAC and Rodborough Common SAC. A number of the locations for development included in the Pre-submission Draft Local Plan were also identified as having potential significant effects either alone or in combination in relation to urban effects, loss of supporting habitat/functionally-linked land, recreation, water issues and air quality. It should be noted that significant effects relating to Cotswolds Beechwoods SAC, Rodborough Common SAC and the Severn Estuary SAC/SPA/Ramsar site for the overall quantum of growth in the plan area were identified through the appropriate assessment work undertaken to be appropriately mitigated through the Pre-submission Draft Local Plan. Mitigation measures include the strategic approaches currently in place to address recreation impacts on Rodborough Common SAC<sup>48</sup> and on the Severn Estuary SAC/SPA/Ramsar<sup>49</sup> and the draft strategy for the Cotswolds Beechwoods SAC<sup>50</sup> which is referenced in the Plan. Uncertainty is attached in relation to the effects for the Rodborough Common and Severn Estuary designations given that the adopted strategies will require updating to ensure they will deliver sufficient mitigation to address the scale of growth in the Plan but adverse effects on integrity alone or in combination are ruled out with a view to this work being done. Likely significant effects relating to site allocations (either alone or in-combination) were also ruled out through the appropriate assessment given the mitigation contained within the policies of the plan.
- 4.73 The policy directs much of the growth over the plan period away from the Cotswolds AONB in the east of the District. Large proportions of growth are allocated to the settlements of Stonehouse (including 700 dwellings at the Stonehouse North West strategic site and a total of 15ha of employment) and Cam (including a total of 1080 dwellings at strategic sites). The landscape sensitivity assessment undertaken to support the Council's SALA<sup>51</sup> concluded that much of the land around these settlements is less sensitive to development. The landscape assessment work undertaken as part of the Gloucestershire Strategic Development Opportunities study<sup>52</sup> concluded that the land where the new settlement at Wisloe is to be provided has medium sensitivity to accommodate the level of development to be delivered. However, large scale development to be provided at Sharpness, and in the Gloucester fringe (including sites at Whaddon and Hunts Grove) have been identified through the landscape sensitivity assessment work as having lower capacity to accommodate development. Although providing much of the large scale development in locations away from the AONB may limit potential adverse impacts on this designated landscape, there is still potential for the large amount of growth to affect the existing townscapes of settlements where they would accommodate large amounts of development. Furthermore, a reduced level of development would still occur within a number of settlements which are within or are close to the AONB, including Minchinhampton, Nailsworth, Painswick and Brimscombe and Thrupp. As such, a significant negative effect is expected for the policy in relation to SA objective 8: **landscapes/ townscapes**. The effect is uncertain as it will largely depend upon the design and layout of development.
- 4.74 In terms of the historic environment, there is potential for the large amount of development allocated over the plan period to adversely impact upon the setting of heritage assets, although high quality design of new development may also provide opportunities to enhance the setting of heritage features. Development at Cam and Stonehouse has the potential to adversely impact

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<sup>47</sup> Footprint Ecology on behalf of Stroud District Council (2021) *Habitats Regulations Assessment of the Stroud District Local Plan Review Pre-submission Draft Plan*

<sup>48</sup> Stroud District Council (2015) *Interim Strategy for Avoidance of Likely Significant Adverse Effects on Rodborough Common Special Area of Conservation (SAC)*

<sup>49</sup> Stroud District Council (2017) *Strategy for Avoidance of Likely Significant Adverse Effects on the Severn Estuary SAC, SPA and Ramsar Site*

<sup>50</sup> Footprint Ecology on behalf of Stroud District Council (2021) *Cotswold Beechwoods SAC Recreation Mitigation Strategy*

<sup>51</sup> White Consultants on behalf of Stroud District Council (2016) *Stroud District Landscape Sensitivity Assessment*

<sup>52</sup> LUC on behalf of Gloucester City Council, Cheltenham Borough Council, Tewkesbury Borough Council, Stroud District Council and Forest of Dean District Council (October) *The Assessment of Strategic Development Opportunities in Parts of Gloucestershire*

upon the high concentration of designated heritage assets in that area including the Industrial Heritage Conservation Area which is currently on the Heritage at Risk Register. A mixed effect (significant negative and minor positive) is therefore expected for the policy in relation to SA objective 9: **historic environment**. The overall effect is uncertain considering that the design of new development is unknown at this stage.

- 4.75 Directing large amounts of strategic growth to Tier 1 settlements (Stonehouse and Cam) has the potential for residents to have good levels of access to existing sustainable transport links, services and facilities and employment opportunities, which may reduce the need for regular travel by private car. However, the new settlements at Sharpness and Wisloe that are promoted through the strategy may have poor access to a full range of services during the earlier stages of development, resulting in a need for residents to travel further afield. It is expected that these settlements would support new provisions of these types in the longer term. Large scale sites to be delivered in line with the growth strategy may also prove more viable when delivering renewable energy infrastructure and connecting a large number of homes to district heating and combined heat and power. As such, mixed effects (minor positive and minor negative) are expected for the policy in relation to SA objective 10: **air quality** and SA objective 14: **climate change**.
- 4.76 Drinking Water Safeguarding Zones are present in the District around Cam where a high level of strategic growth is to be accommodated. A high level of growth in this area could adversely impact water quality in the area. As such, a minor negative effect is expected for the policy in relation to SA objective 11: **water quality**. Although some development within the District may occur on brownfield land in Tier 1 settlements, the majority would require a significant level of greenfield land take. This has the potential to result in increased flood risk due to an increase in the amount of impermeable surfaces in the area. Strategic scale development would be directed towards Stonehouse and Cam where there is land within Flood Zones 2 and 3, although the new settlement site at Wisloe is mostly outside of flood risk zones. Some of the land by Sharpness falls within the flood plain of the River Severn. Of the smaller settlements which would accommodate relatively high levels of development, Berkeley is partially constrained by flood risk from the River Severn and Berkeley Pill, while there are more limited areas of potential flood risk at Brimscombe and Thrupp and Nailsworth associated with the River Frome and the Thames and Severn Canal and the Nailsworth Stream. As such, the policy is expected to result in a mixed minor positive and significant negative effect in relation to SA objective 12: **flooding**.
- 4.77 Directing much strategic growth in and around Tier 1 settlements may encourage the use of brownfield land and the large scale of some developments may allow for the incorporation of more significant elements of green infrastructure. However, it is noted that the scale of growth required will mean that the use of brownfield land will make up a small proportion overall. A mixed minor positive and significant negative effect is therefore expected in relation to SA objective 13: **efficient land use**. Many of the locations proposed for development contain large areas of Grade 3 agricultural land. Furthermore, portions of Grade 2 agricultural land may be adversely affected by new development at Javelin Park as well as at Whaddon where development may come forward to help contribute to meeting the unmet housing needs of Gloucester City for the plan period.
- 4.78 As the growth strategy allocates large proportions of growth in and around Tier 1 settlements and at large new sites, there is potential for the incorporation of new sustainable waste disposal and recycling solutions to benefit a high number of residents which may not be viable at smaller sites. It is expected that at large sites there would also provide more space for the infrastructure required to support these types of improvements. As such, a minor positive effect is expected for the policy in relation to SA objective 15: **waste**.
- 4.79 A significant positive effect is expected for the policy in relation to SA objective 16: **employment** as it will deliver at least 72ha of new employment space within the key employment property market areas of the District (south of Gloucester, Rail/M5/A38 Corridor, Stroud Valleys and Berkeley/Sharpness) and at new settlement locations (Sharpness and Wisloe). This is likely to provide accessible employment opportunities and may indirectly support the vitality of existing town centres due to increased spending. Whilst increased transport pressure may arise in the area from the delivery of these sites, their size may attract Government funding and S106/CIL, which will ensure that there is sufficient transport infrastructure for residents to access employment opportunities and also support future economic growth. The delivery of 10ha of

employment land at the Renishaw New Mills site in close proximity to Kingswood would help support access to employment opportunities for residents in nearby rural locations. However, in general the allocation of new employment space is to be provided mostly at the larger and new settlements and is less likely to support access to employment opportunities for residents in more rural areas of the District. As such, a minor negative effect is expected in combination for the policy in relation to SA objective 16.

- 4.80 Much of the new employment land makes use of the strategic road network in Stroud (the M5 and A-roads) which is likely to prove attractive in terms of securing inward investment. The provision of large-scale growth is also likely to help secure contributions to fund future infrastructure improvements. The policy is considered less likely to support the wider rural economy including its diversification. Overall a mixed (significant positive and minor negative) effect is therefore expected in relation to SA objective 17: **economic growth**.
- 4.81 The policy explains that strategic and local development sites are allocated through the plan to meet the needs of the District. The summary of the appraisal of these sites is presented in **Chapter 5** of this report.

### **Policy CP3: Settlement Hierarchy**

- 4.82 Policy CP3 provides a hierarchy for growth and development across the District that will ensure that development proposals are appropriately located to ensure there is a reduction in the need to travel while promoting sustainable communities. The policy states that new development should be located in accordance with the District's settlement hierarchy, with Tier 1 settlements to provide significant levels of jobs and homes. Tier 2 settlements are identified as having potential for development to support modest levels of jobs and homes. The policy also sets out that development at Tier 3 settlements will principally be to meet specific local needs to safeguard or enhance the settlement's current role, function and accessibility. Very limited development at Tier 4 settlements should take place only where there is a specific identified local need. The policy also highlights that at least 30% affordable housing is to be provided at larger development sites (defined as over 4 homes for Tier 4 settlements within designated rural areas and over 10 homes for all larger settlements). A significant positive effect is therefore expected for the policy in relation to SA objective 1: **housing**.
- 4.83 A significant positive effect is also expected for the policy in relation to SA objective 2: **health** given that, while some development is directed to smaller settlements, most growth is directed to the larger settlements where existing healthcare provision is strongest and where opportunities to walk and cycle day-to-day are likely to be greatest.
- 4.84 A significant positive effect is also expected for the policy in relation to SA objective 6: **services and facilities** considering that similar levels of access are likely to result in terms of educational, cultural and other types of facilities. Minor positive effects are expected for the policy in relation to SA objective 3: **social inclusion** and SA objective 5: **vibrant communities**. Allowing for much of the new growth over the plan period within the settlement development limits is likely to have benefits in relation to inclusivity and resident satisfaction due to the high level of access to services and facilities, particularly at larger settlements. Allowing for a limited amount of new development at the smaller settlements has the potential to support service provision and vitality at these locations.
- 4.85 The policy states that substantial weight should be given to the use of previously developed land and buildings within settlements, and directs most development to larger settlements where opportunities to reuse existing sites and buildings are likely to be greatest. As such, a minor positive effect is expected for the policy in relation to SA objective 13: **efficient land use**. However, the policy is also supportive of some development adjacent to the settlement development limits in exceptional circumstances. Due to the large amount of growth to be delivered, a large proportion of development will occur on greenfield land which is likely to result in the loss of high-quality soils considering that much of land in and surrounding the settlements is Grade 3 agricultural land. Therefore, a minor negative effect is also expected in relation to SA objective 13.
- 4.86 By limiting growth outside of the settlements the potential for adverse impacts on the designated landscape of the Cotswolds AONB is likely to be limited. It is noted, however, that some of the larger settlements (most notably Tier 2 settlements Minchinhampton, Painswick and Wotton-



under-Edge) lie within the AONB boundary meaning that there is potential for impacts on its wider setting. Directing the highest level of growth to areas within the settlement development limits of the larger settlements may result in adverse impacts in terms of the existing townscape. It may also provide opportunities to improve this existing character, through the delivery of high-quality development or the redevelopment of brownfield land. As such an overall mixed minor positive and minor negative effect is expected in relation to SA objective 8: **landscape/townscape**.

- 4.87 The larger Tier 1 settlements contain the highest concentrations of heritage assets. As such, directing most development to those areas could adversely affect a high number of heritage assets. However, there is potential for development to improve the setting of heritage assets through high quality and sympathetic design and therefore a mixed (minor positive and minor negative) effect is expected in relation to SA objective 9: **historic environment**.
- 4.88 While focussing most development towards the larger settlements of the District may avoid adverse impacts on biodiversity impacts in more rural areas, the policy could support some development at settlements (including Tier 3a Sharpness and Frampton on Severn) in close proximity to the internationally designated Severn Estuary SAC/SPA/Ramsar. Development within the Stroud Valleys would also be in close proximity to the Rodborough Common SAC. As such, a significant negative effect is expected for the policy in relation to SA objective 7: **biodiversity/geodiversity**. The effects relating to SA objectives 7, 8 and 9 are uncertain as the design of new development will be the key factor influencing impacts on character and setting and may also allow for biodiversity mitigation.
- 4.89 Minor negative effects are expected for the policy in relation to SA objectives 11: **water quality** and 12: **flooding**. Land at Cam and Dursley (Tier 1 settlements which are highlighted by the policy to continue to provide significant levels of jobs and homes) falls within a Source Protection Zone where new development could impact on water quality. In addition, some of the land at settlements by the River Severn (Sharpness and Frampton on Severn) and the Stroud Valleys falls within flood zone 2 and 3. While most development would be directed away from these Tier 3 settlements (which include Sharpness and Frampton on Severn), they are still expected to see some growth.
- 4.90 By requiring that new development should be located in accordance with the settlement hierarchy and providing support for development within the settlement development limits, a high number of residents are likely to have good access to services and facilities and sustainable transport links. As such, there is potential for negative impacts on air quality and carbon emissions to be limited considering that modal shift may result. Furthermore, supporting a more limited amount of development at the smaller settlements is likely to support the viability of these settlements in the long term, which may reduce the need for residents to travel in some situations. As such minor positive effects are expected for the policy in relation to SA objective 10: **air quality** and SA objective 14: **climate change**.
- 4.91 The policy is likely to support the creation of accessible employment opportunities by directing most growth to larger settlements. It is also likely to support the vitality of existing town centres by directing higher levels of growth to areas within the settlement development limits. Limiting development at the more rural areas of the District may mean that employment opportunities are likely to be less accessible to residents at these locations. This approach is also less likely to help diversify the rural economy in the District. As such mixed (significant positive and minor negative) effects are expected in relation to SA objective 16: **employment** and SA objective 17: **economic growth**.

#### **Policy CP4: Place making**

- 4.92 The overall purpose of Core Policy CP4 is to ensure that all development proposals integrate into the neighbourhood, place-shape and protect or enhance a sense of place, and create safe streets, homes and workplaces. Therefore, a significant positive effect is expected in relation to SA objective 5: **vibrant communities** and a minor positive effect is expected in relation to SA objective 4: **crime**.
- 4.93 The policy requires that developments should take account of connectivity and be located close to appropriate levels of services and facilities. This element of the policy should help to reduce dependency on travel by private vehicle, particularly as the policy requires developments to improve transport choices and incorporate measures that would promote the use of more

sustainable modes of transport including through the provision of storage for bicycles. Minor positive effects are therefore likely in relation to SA objectives 6: **services and facilities**, 10: **air quality** and SA objective 14: **climate change**. Encouraging walking and cycling will also facilitate an increase in physical activity amongst the local population; therefore a minor positive effect is also expected in relation to SA objective 2: **health**, particularly because the policy also supports development which would provide public and private amenity spaces.

- 4.94 Policy CP4 also requires that development proposals contribute towards the District's employment and housing needs in terms of mix, tenure and type. Therefore, minor positive effects are expected in relation to SA objectives 1: **housing** and 16: **employment**. The criteria set out in the policy should help to ensure that new housing and employment development is of a high quality.
- 4.95 The policy seeks to protect and enhance the District's character and special landscapes by supporting development which incorporates locally-distinctive architectural styles and materials and works with the site's topography and landscape features. The policy is likely to prevent development that will have an adverse effect on the character of the District's settlements and landscapes. A minor positive effect is therefore likely in relation to SA objective 8: **landscapes/townscapes**.
- 4.96 Policy CP4 also requires new development to consider the protection and enhancement of local biodiversity, as well as the historic environment and any heritage assets. Therefore, minor positive effects are expected in relation to SA objectives 7: **biodiversity/geodiversity** and 9: **historic environment**.
- 4.97 As the policy requires developments to provide adequate external storage space for waste bins and recycling materials, it should encourage and facilitate higher levels of recycling and a minor positive effect is expected in relation to SA objective 15: **waste**.

#### **Policy CP5: Environmental development principles for strategic sites**

- 4.98 Core Policy CP5 sets out principles for the siting, design and construction of strategic development sites. It seeks to ensure that new development is located and designed to provide a sustainable form of development with low environmental impacts, and accessible via various modes of transport. It is likely that promoting modal shift should help to limit any increase in air pollution and carbon emissions resulting from new development and therefore positive effects are expected in relation to SA objective 10: **air quality** and SA objective 14: **climate change**. As the policy also requires that strategic development should contribute to the achievement of minimising energy consumption and net greenhouse gas emissions, the positive effect expected in relation to SA objective 14 is likely to be significant. Encouraging modal shift in the plan area is also likely to have benefits relating to public health and therefore a minor positive effect is expected in relation to SA objective 2: **health**.
- 4.99 Development is required to be provided at an appropriate density that is acceptable in terms of townscape, character, and amenity. Therefore, minor positive effects are expected in relation SA objective 8: **landscapes/townscapes** and SA objective 9: **historic environment**. Furthermore, the policy requires demonstration of how development proposals will minimise impacts on the natural environment and maximise green infrastructure. This is likely to protect and enhance biodiversity in the District and therefore minor positive effects are expected in relation to SA objective 7: **biodiversity/geodiversity**. Strategic development sites should also provide access to key services and community facilities. By promoting development at sustainable locations that will not have adverse effects on the District's character, the policy is also likely to help protect the sense of satisfaction that residents have with their surroundings. As such minor positive effects are expected in relation to SA objective 5: **vibrant communities** and SA objective 6: **services and facilities**.
- 4.100 The policy also requires that development applications for strategic sites incorporate sustainable construction principles. These include the minimisation of waste and maximisation of recycling. A minor positive effect is therefore expected in relation to SA objective 15: **waste**, Strategic development should also help to achieve efficient use of water and should also incorporate Sustainable Drainage Systems. Minor positive effects are therefore expected in relation to SA objectives 11: **water quality**, and 12: **flooding**.

### Policy CP6: Infrastructure and developer contributions

- 4.101 Core Policy CP6 aims to ensure that the District's infrastructure needs are met, with developers to be expected to make required infrastructure provision for communities affected by the delivery of new development. Meeting infrastructure needs in the District is to be secured through the review of the Infrastructure Delivery Plan (IDP), implementation of a Community Infrastructure Levy (CIL) and negotiation of planning obligations.
- 4.102 Developer contributions secured in this manner are likely to help to maintain a high standard of living conditions in the plan area. It is likely that infrastructure improvements associated with the transport network would support economic activity would therefore encourage inward investment in the District. Therefore, minor positive effects are expected in relation to SA objective SA objective 5: **vibrant communities**, and SA objective 17: **economic growth**. While the policy states that the scale and nature of provision will have regard to viability considerations, requirements of this nature may result in some areas becoming less attractive to potential investors, dependent upon their specific decision making. It is likely, however, that similar contributions would be required in other local authority areas and therefore the potential for economic investment in Stroud is not likely to be unduly affected by the policy requirements.
- 4.103 The provision and funding of new infrastructure over the plan period is expected to include new services and facilities for local communities affected by new development. This may include new facilities which support public health (such as GP surgeries) and therefore minor positive effects are expected in relation to SA objective 2: **health** and SA objective 6: **services and facilities**. New infrastructure is also likely to include road improvements as well as new sustainable transport links and therefore mixed minor positive and minor negative effect are expected in relation to SA objective 10: **air quality** and SA objective 14: **climate change**.

### SA Findings for Pre-submission Draft Local Plan Policies: Homes and communities

- 4.104 The Pre-submission Draft Local Plan contains five Core Policies and 15 Delivery Policies which set out the approach to delivering accessible, healthy and inclusive communities across the District, as well as meeting the District's housing needs in the most sustainable way. This section presents the SA findings for the policies included in this chapter of the Pre-Submission Draft Local Plan, with the effects of the Core Policies described first, followed by those relating to the Delivery Policies.
- 4.105 The potential sustainability effects of Core Policies DCP2 and CP7 to CP10 are described below.

**Table 4.5 SA findings for the Core Policies relating to homes and communities**

SA Objective	CP7 – Inclusive Communities	DCP2 – Supporting Older People	CP8 – New Housing Development	CP9 – Affordable Housing	CP10 – Gypsy, Traveller and Travelling Showpeople Sites
SA 1: Housing	++	++	++	++	++
SA 2: Health	+	++	+	0	0
SA 3: Social inclusion	++	++	+	+	+
SA 4: Crime	0	0	0	0	0
SA 5: Vibrant communities	+	+	+	+	+
SA 6: Services and facilities	+	+	+	+	+
SA 7: Biodiversity/geodiversity	0	0	+	+	0
SA 8: Landscapes/townscapes	0	0	+	+	0
SA 9: Historic environment	0	0	+	+	0
SA 10: Air quality	+	0	+	0	0
SA 11: Water quality	0	0	0	0	0
SA 12: Flooding	0	0	0	0	+
SA 13: Efficient land use	0	0	0	0	0
SA 14: Climate change	+	0	+	0	0
SA 15: Waste	0	0	0	0	+
SA 16: Employment	0	0	0	0	0
SA 17: Economic growth	0	0	+	0	0

**Policy CP7: Inclusive Communities**

4.106 Policy CP7 requires that new housing development should contribute to the provision of sustainable and inclusive communities by ensuring that housing meets the needs of a range of people in the District, including an ageing population, children/young people and families, people with special needs and minority groups. As such, a significant positive effect is expected for the policy in relation to SA objective 1: **housing** due to the contribution that the policy is likely to make towards meeting a variety of housing needs. A significant positive effect is also expected for the policy in relation to SA objective 3: **social inclusion** as the policy is strongly focussed on promoting inclusive communities. This includes ensuring that community services that cater for health and wellbeing are easily accessible for elderly people and people with special needs. As such, a minor positive effect is also expected in relation to SA objective 2: **health**. More generally, the aforementioned provisions may also result in greater satisfaction of people with the neighbourhoods they live in. Therefore, a minor positive effect is expected for the policy in relation to SA objective 5: **vibrant communities**.

- 4.107 The policy promotes housing development that will provide well-coordinated service provision that will meet the needs of residents in the long-term. As such, a minor positive effect is expected for the policy in relation to SA objective 6: **services and facilities**. The requirement for developers to demonstrate that they will satisfy community needs is likely to result help promote good levels of access to day-to-day provisions, which may reduce the need for residents to travel further afield. As such, minor positive effects are expected for the policy in relation to SA objective 10: **air quality** and SA objective 14: **climate change**.

#### **Policy DCP2: Supporting Older People and People with Mobility Issues**

- 4.108 Policy DCP2 seeks to support older people and people with mobility issues in the District by encouraging development that provides a range of housing options. This range of housing is to allow elderly people and people with mobility issues to live independently in their own home, with good access to care and support services. The modelled demand for the District is 3,091 older person homes, with 2,811 being homes for independent living and 280 being homes which support extra care. To achieve this, the policy sets out the specific proportions of market and affordable homes and specialist housing that should be provided to be accessible and adaptable by meeting relevant Building Regulations. This will ensure that the identified need in the District is sufficiently catered to. As such, a significant positive effect is expected for the policy in relation to SA objective 1: **housing**.
- 4.109 A significant positive effect is also expected in relation to SA objective 3: **social inclusion** for this policy given that it contributes to meeting the needs of an ageing population and also seeks to increase the engagement of older people in community life. This is likely to increase the satisfaction of elderly people with the neighbourhoods they live in and could present opportunities for them to engage in cultural activities. Therefore, a minor positive effect is expected for the policy in relation to SA objective 5: **vibrant communities**.
- 4.110 The policy also seeks to promote more active lifestyles among older residents and residents with mobility issues in the District. Securing these types of benefits is likely to help promote improvements in health and well-being particularly when considering the potential for improved access to care and support services. A significant positive effect is therefore expected for the policy in relation to SA objective 2: **health** and a minor positive effect is likely for SA objective 6: **services and facilities**.

#### **Policy CP8: New Housing Development**

- 4.111 Policy CP8 sets out that a range of different types, tenures and sizes of housing should be delivered to reflect the requirements of the Parish Cluster areas in Stroud. It does not set the overall level of growth to be delivered at different locations in the District, which is instead addressed through Policy CP2. The policy is likely to have a significant positive effect in relation to SA objective 1: **housing** as it states that new development should be considerate of housing needs in the District in line with the Local Housing Needs Assessment. The criteria of the policy will combine to ensure that the new housing provided in the District is of high quality.
- 4.112 The policy furthermore requires that new housing should be of a density that is acceptable in amenity terms. As the policy is likely to help meet the needs of local people in terms of housing and will also help support residential satisfaction with their neighbourhoods a minor positive effect is expected in relation to SA objective 5: **vibrant communities**.
- 4.113 The policy also requires that the layout of new residential developments should facilitate access to key services and community facilities. As such, a minor positive effect is expected for the policy in relation to SA objective 6: **services and facilities**. Access to services should be secured by bus, bicycle and foot. As well as having beneficial impacts in terms of encouraging increasing levels of physical activity, this approach also should help to reduce reliance on travel by private vehicle. The policy also seeks to encourage the use of sustainable construction techniques as well as the promotion of development which would incorporate renewable or low carbon energy sources and infrastructure to limit greenhouse gas emissions and adapt to climate change. Therefore, minor positive effects are expected in relation to SA objectives 2: **health**, 10: **air quality** and 14: **climate change**. In addition, a minor positive effect is expected for the policy in relation to SA objective 3: **social inclusion** as it is likely that providing good access to services and community facilities may help to decrease the potential for social isolation at new housing developments.

- 4.114 The policy requires housing developments to enhance biodiversity onsite, including through the provision of multifunctional green spaces. In light of this requirement, a minor positive effect is expected in relation to SA objective 7: **biodiversity/geodiversity**. The policy also requires that new development is provided at a density that is acceptable in terms of the existing townscape and local environment character. As such minor positive effects are expected in relation to SA objective 8: **landscapes/townscapes** and SA objective 9: **historic environment**.
- 4.115 A minor positive effect is also expected for the policy in relation to SA objective 16: **employment** as the policy includes provisions to ensure that new housing developments support accessibility to employment opportunities.

#### **Policy CP9: Affordable Housing**

- 4.116 Policy CP9 sets out the requirement for affordable housing provision in the Cotswolds AONB, selected rural parishes and other areas of Stroud District. A significant positive effect is identified for the policy in relation to SA objective 1: **housing** as the policy includes the requirement that there is provision of at least 30% affordable housing at sites capable of delivering 10 dwellings or more across the District. In addition, the policy also includes a more stringent requirement for sites in the AONB or the designated rural areas. In these areas sites capable of providing 4 or more dwellings will be required to provide at least 30% affordable housing. This approach is likely to help meet the need for 424 affordable dwellings per annum over the plan period.
- 4.117 It is expected that the delivery of affordable housing in Stroud will help to ensure that the needs of groups which otherwise might be unable to access affordable housing in the area are provided for. A minor positive effect is therefore also expected in relation to SA objective 3: **social inclusion**.
- 4.118 The policy also states that the density of new affordable housing provision should be acceptable in townscape, local environment, character and amenity terms. These requirements should help to ensure new developments are of a quality as to be highly liveable, would not have adverse ecological impacts and are respectful of existing landscape character and the setting of heritage assets. As such minor positive effects are expected in relation to SA objectives 5: **vibrant communities**, 7: **biodiversity/geodiversity**, 8: **landscapes/townscapes** and 9: **historic environment**.

#### **Policy CP10: Gypsy, Traveller and Travelling Showpeople Sites**

- 4.119 Policy CP10 seeks to address the requirement for Gypsy, Traveller and Travelling Showpeople uses in line with the Gypsy and Traveller Accommodation Assessment for the District. A significant positive effect is expected for the policy in relation to SA objective 1: **housing** as the delivery of seven additional pitches and eight to twelve additional plots for Gypsies and Travellers and Travelling Showpeople respectively is expected to contribute to meeting the accommodation needs of these groups in the District. This should also help promote social inclusion in the plan area. As such a minor positive effect is expected in relation to SA objective 3: **social inclusion**.
- 4.120 In addition, the policy also includes a requirement for any new sites to be located in locations where there is good access to local amenities and services, which includes health centres. As such, a minor positive effect is identified for the policy in relation to SA objectives 6: **services and facilities** and 2: **health**. The policy also states that new sites should not have adverse impacts in terms of neighbouring residential amenity. This will help contribute to the creation of high-quality places in Stroud and therefore a minor positive effect is recorded in relation to SA objective 5: **vibrant communities**.
- 4.121 The policy requires that any new sites are sited at locations which would allow for surface water drainage and that sites should not be within unacceptable flood risk areas. As such a minor positive effect is expected in relation to SA objective 12: **flooding**. Sites for Gypsy, Traveller and Travelling Showpeople should also allow for on-site waste disposal and therefore a minor positive effect is expected in relation to SA objective 15: **waste**.
- 4.122 The likely sustainability effects of Delivery Policies DHC1, DHC2, HC2, HC3, HC4 and DHC3 are described below.

**Table 4.6 SA findings for the first group of Delivery Policies relating to homes and communities**

SA Objective	DHC1 – Meeting housing need within defined settlements	DHC2 – Sustainable rural communities	HC2 – Providing new homes above shops in our own centres	HC3 – Self-build and custom build housing provision	HC4 – Local housing need (exception sites)	DHC3 – Live-work development
SA 1: Housing	++	++	+	++	++	+
SA 2: Health	+/-	-	+	0	+/-	+
SA 3: Social inclusion	0	+	0	+	+	0
SA 4: Crime	0	0	0	0	0	0
SA 5: Vibrant communities	+	+	+	0	+	0
SA 6: Services and facilities	+/-	+/-	+	+	+/-	+
SA 7: Biodiversity/geodiversity	0	0	0	0	0	0
SA 8: Landscapes/townscapes	0	+/-?	0	-?	-?	0
SA 9: Historic environment	0	0	0	0	-?	0
SA 10: Air quality.	+/-	-	+	0	+/-	+
SA 11: Water quality	0	0	0	0	0	0
SA 12: Flooding	0	0	0	0	0	0
SA 13: Efficient land use	0	-	+	0	-	0
SA 14: Climate change	+/-	-	+	0	+/-	+
SA 15: Waste	0	0	0	0	0	0
SA 16: Employment	+/-	0	+	0	+/-	+
SA 17: Economic growth	0	0	+	0	0	+

**Policy DHC1: Meeting housing need within defined settlements**

- 4.123 Policy DHC1 sets out that at the defined settlements permission will be granted for residential development or redevelopment subject to meeting criteria for local housing need at the relevant settlement. A significant positive effect is therefore identified for the policy in relation to SA objective 1: **housing** as it is likely to help ensure that the housing need for individual settlements in Stroud are met over the plan period.
- 4.124 This approach is likely to help safeguard and enhance the identity of the District’s existing communities and settlements, by focussing much of the new development over the plan period at existing settlements. As such a minor positive effect is expected in relation to SA objective 5: **vibrant communities**.
- 4.125 The settlements of the District generally provide the highest level of access to services and facilities, particularly in comparison to rural locations. It is noted, however, that the lower order settlements (Tier 3b and lower) provide poorer access to key services and facilities, as well as employment opportunities. Considering that the policy addresses all the settlements with defined

settlement development limits (i.e. all those settlements in the settlement hierarchy but not the very small settlements which are to be treated as open countryside) it is likely that the policy would facilitate development at both larger and smaller settlements. Mixed minor positive and minor negative effects are therefore expected in relation to SA objective 6: **services and facilities** and SA objective 16: **employment**.

- 4.126 The accessibility of services and facilities and employment opportunities from residential development will have a bearing on the potential to encourage modal shift in the District, including the uptake of active modes of transport. As such the policy is expected to have mixed minor positive and minor negative effects in relation to SA objective 2: **health** as well as SA objective 10: **air quality** and SA objective 14: **climate change**.

#### **Policy DHC2: Sustainable rural communities**

- 4.127 Policy DHC2 addresses the delivery of small housing schemes outside settlement development limits at designated Tier 3b and Tier 4 settlements. The policy is likely to help support the delivery of new housing which is of the type, tenure and size to address housing needs at the smaller settlements of Stroud. Where affordable housing is required, in line with the relevant policy, this provision should be made available to those in need with a strong local connection. As such the policy should respond directly to the specific housing needs in the District as well as helping to address the social requirements of the local community. A significant positive effect is therefore expected in relation to SA objective 1: **housing** and a minor positive effect is expected in relation to SA objective 3: **social inclusion**.
- 4.128 The provision of development outside of the settlement development limits is to be limited to ensure cumulative increases are no more than 10% of settlement housing stock at 2020. This requirement should help to limit the potential for the existing identity of settlements to be disrupted. Furthermore, as the policy is supportive of the delivery of affordable housing for local need it is expected that benefits may result in terms of meeting the needs of people who might otherwise be priced out of living at certain settlements in Stroud. As such a minor positive effect is expected in relation to SA objective 5: **vibrant communities**.
- 4.129 Impacts in terms of local character, landscape setting and loss of open countryside could result where development is located beyond the current settlement development limits, particularly considering the smaller sizes of these settlements. The policy requirement for development to be in accordance with the existing settlement pattern, the local environment, character and landscape setting of the settlement should, however, help to limit these effects. As such a mixed minor positive and minor negative effect is expected in relation to SA objective 8: **landscapes/townscapes**. The overall effect is uncertain given that the design of new development may provide opportunities to mitigate adverse impacts relating to landscape setting. Considering that development beyond settlement boundaries at smaller settlements would likely occur on greenfield land, a minor negative effect is also expected in relation to SA objective 13: **efficient land use**.
- 4.130 Tier 3b settlements are defined by the Local Plan as those with range of services and facilities for their communities, with poorer access to key services and facilities elsewhere. Tier 4 settlements are defined as those with basic or minimal facilities for their communities. The more limited service offer at the smaller settlements will mean that new residents have reduced access to these types of provisions. However, providing new residential properties adjacent to the existing smaller settlements may have some positive effects in terms of helping provide critical mass to support new service provision, particularly in the long term. Therefore, a mixed minor positive and minor negative effect is expected in relation to SA objective 6: **services and facilities**.
- 4.131 The requirement for new residents to travel longer distances to essential provisions is likely to reduce the potential for sustainable and active modes of transport to be used as development is provided. As such minor negative effects are also expected in relation to SA objectives 10: **air quality** and SA objective 14: **climate change**.

#### **Policy HC2: Providing new homes above shops in our town centres**

- 4.132 Policy HC2 relates to residential use of upper levels of shops and offices in the town and local centres of the District. A minor positive effect is identified for the policy in relation to SA objective 1: **housing** due to the potential contribution of such homes to meeting the District's housing



need. Considering that the policy requires that new development of this type should not threaten the vitality of town centres or create amenity or parking problems, a minor positive effect is also expected in relation to SA objective 5: **vibrant communities**. It is also likely that this approach would also help to promote higher levels of footfall within the town centres of the District.

- 4.133 In addition, a minor positive effect is also expected for the policy in relation to SA objective 6: **services and facilities** as residential units in town and local centres would have good access to existing and new service provision. A minor positive effect is also expected for the policy in relation to SA objective 13: **efficient land use** as the policy promotes the provision of residential development on previously used land opposed to greenfield sites.
- 4.134 The delivery of residential development within existing town centres may contribute to their viability due to additional expenditure in the area by residents. In addition, residential development within existing town centres is likely to be in close proximity to employment opportunities that can be accessed by residents using sustainable modes of transport. As such, minor positive effects are expected for the policy in relation to SA objectives 16: **employment** and 17: **economic growth**.
- 4.135 The potential for residents of such properties to travel more by sustainable modes of transport is also likely to help reduce car use and minor positive effects are expected in relation to SA objectives 10: **air quality** and 14: **climate change**. It is likely that the policy requirement for this type of development to avoid the creation of amenity problems will limit the potential for air quality or noise issues to result. Higher levels of walking and cycling could also result in a minor positive effect in relation to SA objective 2: **health**.

#### **Policy HC3: Self-build and custom build housing provision**

- 4.136 Policy HC3 provides support for self-build and custom build dwellings. A significant positive effect is expected for the policy in relation to SA objective 1: **housing** considering that it is supportive of meeting the Government's aspirations to increase self-build developments, subject to identified local demand. Supporting such developments should also help to ensure that housing is able to be provided to meet specific needs, and the policy requires that homes are built to cater for changing lifetime needs. The requirement for self-build schemes to be integrated into wider development schemes is likely to help promote integration in the community. Therefore, a minor positive effect is expected for the policy in relation to SA objective 3: **social inclusion**.
- 4.137 The policy includes a requirement for self-build and custom build housing to be provided with appropriate linkages to infrastructure and amenities. As such a minor positive effect is expected for in relation to SA objective 6: **services and facilities**.
- 4.138 It is possible that the delivery of new self-build and custom build housing adjacent to (rather than within) settlement development limits would result in impacts relating to landscape setting as well as settlement form. As such, minor negative effects are expected for the policy in relation to SA objective 8: **landscapes/townscapes**. The effects are uncertain as any impacts on landscape will depend on the detailed design and layout of development, which is unknown at this stage.

#### **Policy HC4: Local housing need (exception sites)**

- 4.139 Policy HC4 addresses the provision of affordable homes on sites that are not within but are well related to existing settlements. A significant positive effect is expected for the policy in relation to SA objective 1: **housing** due to the potential for local housing needs to be met on rural exception sites, with a particular focus on delivering affordable housing, including self-build or custom build. The policy is furthermore set out to specifically help meet the needs of residents requiring affordable housing with connections to the local area. Development is required by the policy to satisfy the detailed criteria defined for meeting the housing need at settlements. It is supportive of development at third tier settlements and above and at fourth tier settlements where there is specific local need and appropriate environmental considerations. It is expected that this approach will help to help protect the sustainability of some of the smaller rural settlements in the plan area and therefore a minor positive effect is expected in relation to SA objective 5: **vibrant communities**.
- 4.140 Housing development on exception sites could potentially have adverse impacts in terms of access to services and employment opportunities and requirements to travel longer distances on

a regular basis, as well as additional environmental impacts. It is also likely that residents at more rural locations will be less likely to travel by active modes of transport considering the reduced level of access to essential day to day provisions from these locations. However, the policy suggests that, in the first instance, sites should be considered at locations adjacent to Tier 3 settlements. Development sites are required to be accessible to a range of local services, such as shops, primary schools, healthcare and public transport. As such, mixed (minor positive and minor) negative effects are expected in relation to SA objectives 2: **health**, 6: **services and facilities**, 10: **air quality**, 14: **climate change** and 16: **employment**.

- 4.141 The policy suggests that local need should be met at Tier 4 settlements in cases where specific local need and environmental considerations limit potential at a Tier 3 settlement. This considered, it is likely that allowing new residential development close to, or adjoining smaller settlements has the potential to disturb the existing character. This may include impacts on the setting of heritage assets at these locations. As such, minor negative effects are expected for the policy in relation to SA objective 8: **landscapes/townscapes** SA objective 9: **historic environment**. These effects are uncertain given that the specific siting and design of new development may provide opportunities to mitigate adverse impacts.
- 4.142 A minor negative effect is also expected for Policy HC4 in relation to SA objective 13: **efficient land use**. Delivering housing outside of settlement boundaries is likely to result in some development occurring on greenfield land, although any such development would be small-scale.

### **Policy DHC3: Live-work development**

- 4.143 Policy DHC3 sets out criteria relating to the provision of live-work units in the District. Live-work units can make an important and flexible contribution to the rural economy. They can help to reduce commuting times to employment opportunities and may encourage diversified economic investment in more rural area. As such, minor positive effects are expected for the policy in relation to SA objective 16: **employment** and SA objective 17: **economic growth**, recognising that the scale of live-work developments is very small. The policy includes the criteria that the work element should be not ancillary to the dwelling and that residential use of such a building should not precede the business use. In addition, the policy includes a requirement that such proposals should not result in the loss of existing employment sites, which is likely protect existing employment opportunities.
- 4.144 A minor positive effect is also expected for the policy in relation to SA objective 1: **housing** due to the potential for live-work developments to contribute to an overall housing mix that will meet a range of needs.
- 4.145 Supporting development which could result in shorter commuting times in the District is likely to help the limit the release of air pollutants and carbon dioxide from transport related sources. Furthermore, the policy requires that this type of development is located within or adjoining settlement development limits which is likely to limit the need to travel to access day to day requirements, including services and facilities. Providing residents with a good level of access to day to day provisions may also help to promote the uptake of active modes of transport in Stroud. Minor positive effects are therefore expected in relation to SA objectives 2: **health**, 6: **services and facilities**, 10: **air quality** and 14: **climate change**.
- 4.146 The likely sustainability effects of Delivery Policies HC1, DHC4, HC5, HC6, HC7 and HC8 are described below.

**Table 4.7 SA findings for the second group of Delivery Policies relating to homes and communities**

SA Objective	HC1 – Detailed criteria for new housing developments	DHC4 – Community-led housing	HC5 – Replacement dwellings	HC6 – Residential sub-division of dwellings	HC7 – Annexes for dependents or carers	HC8 – Extensions to dwellings
SA 1: Housing	++	++	+	+	+	+
SA 2: Health	+	+	0	+/-	+	0
SA 3: Social inclusion	0	+	0	0	+	0
SA 4: Crime	0	0	0	0	0	0
SA 5: Vibrant communities	+	+	0	+	+	+
SA 6: Services and facilities	0	+	0	+	0	0
SA 7: Biodiversity/geodiversity	+	+	0	0	0	0
SA 8: Landscapes/townscapes	+	0	+	+	0	+
SA 9: Historic environment	+	0	+	+	0	+
SA 10: Air quality.	+/-?	0	0	+/-	0	0
SA 11: Water quality	0	0	0	0	0	0
SA 12: Flooding	0	0	0	0	0	+
SA 13: Efficient land use	0	0	0	+	+	0
SA 14: Climate change	+/-?	+	+	+/-	0	+
SA 15: Waste	0	0	0	+	0	0
SA 16: Employment	0	0	0	+	0	0
SA 17: Economic growth	0	0	0	0	0	0

**Policy HC1: Detailed criteria for new housing developments**

- 4.147 Policy HC1 sets out detailed criteria which new housing developments within Stroud District should meet. An appropriate variety of dwelling types and sizes to meet local needs is included in the requirements of the policy, and the other criteria will combine to ensure that new housing is of high quality. As such, a significant positive effect is expected for the policy in relation to SA objective 1: **housing**.
- 4.148 Policy HC1 requires that housing should be compatible with the character and uses of the part of the settlement in which it would be located. The policy also requires that development on settlement edges should be sympathetic and in keeping with the existing settlement and should avoid coalescence with other settlements in the area. As such, a minor positive effect is expected for the policy in relation to SA objective 8: **landscapes/townscapes**. These measures are also likely to help protect the setting of nearby heritage assets, which could otherwise be negatively impacted by development in inappropriate locations. Therefore, a minor positive effect is also expected in relation to SA objective 9: **historic environment**.

- 4.149 The policy also requires that development should provide a suitable level of amenity, ensuring that safe access and parking that is appropriate to the site is provided. As this approach should help to contribute to residential satisfaction in the District, a minor positive effect is expected in relation to SA objective 5: **vibrant communities**. However, by including parking requirements for new residential developments, the potential for achieving modal shift may be limited. As such minor negative effects are expected in relation to SA objective 10: **air quality** and SA objective 14: **climate change**. As the policy states that parking provided should be appropriate to the site and its surroundings, the effect is uncertain given that interpretation of the policy may allow for a limited amount of parking in certain circumstances. The negative effect is combined with a minor positive effect for SA objectives 10 and 14 given that the policy requires development to improve access to walking and cycling routes where possible. This requirement could help to promote the use of more sustainable modes of transport.
- 4.150 Whilst the main focus of the policy relates to the layout and design of new residential development, it also includes preventative measures to ensure that key areas of open space, PROW and locally valued habitats are preserved. Furthermore, the policy also requires that developments would contribute to a net gain in biodiversity. As such, a minor positive effect is expected for the policy in relation to SA objective 7: **biodiversity/geodiversity**. The protection of open spaces and PROW within housing developments is likely to preserve opportunities for recreation and sporting activities. Additionally, the policy also includes criteria requiring that housing developments should improve connectivity of housing to walking and cycling routes, where possible. Therefore, a minor positive effect is also expected in relation to SA objective 2: **health**.

#### **Policy DHC4: Community-led housing**

- 4.151 Policy DHC4 supports the development of new community-led housing in the District. The provision of new homes in line with this policy may include affordable housing, co-housing, community self-build and housing for elderly/disabled people. As such the policy is likely to help support the delivery of a range of housing types to help meet local needs. A significant positive effect is therefore identified for the policy in relation to SA objective 1: **housing**. A minor positive effect is also expected for the policy in relation to SA objective 3: **social inclusion** due to the potential for the housing needs of more vulnerable groups of people to be met through these types of schemes. By supporting the successful functioning of legitimate local community groups in Stroud, the policy is also likely to help promote a sense of ownership among residents and therefore a minor positive effect is expected in relation to SA objective 5: **vibrant communities**.
- 4.152 Opportunities for improvements to resident's health and wellbeing are promoted through Policy DHC4, given its support for the inclusion of space for food growing and recreation within community-led housing developments. Therefore, a minor positive effect is identified in relation to SA objective 2: **health**. The policy is also supportive of proposals which would include community buildings and space for wildlife and therefore minor positive effects are also expected in relation to SA objectives 6: **services and facilities** and 7: **biodiversity/geodiversity**.
- 4.153 As well as delivering benefits to the communities of Stroud in terms of supporting housing delivery for particular groups, the policy may contribute to limiting carbon emissions. The policy is particularly supportive of new proposals which contribute to meeting the Council's carbon neutral developments targets. Therefore, a minor positive effect is identified for the policy in relation to SA objective 14: **climate change**.

#### **Policy HC5: Replacement dwellings**

- 4.154 Delivery Policy HC5 sets out criteria for the replacement of dwelling houses outside defined settlement development limits. The policy permits the provision of a replacement dwelling which is slightly larger than the original where this would allow for basic living standards to be achieved. The policy is therefore expected to make a minor contribution to achieving decent housing stock at rural locations of the District. As a result, a minor positive effect is expected in relation to SA objective 1: **housing**.
- 4.155 The policy requires that replacement dwellings should not detract from the character and appearance of their surroundings. The building which is to be replaced should also not be a designated or non-designated heritage asset. As such the policy is expected to help conserve the

existing character and elements which contribute to the historic environment in the District. Therefore, minor positive effects are expected in relation to SA objectives 8:

**landscapes/townscapes** and 9: **historic environment**.

- 4.156 The policy also requires that the replacement dwelling should be a similar size to the existing dwelling with only some minor enlargements allowed for in certain circumstances. This includes when exceptional sustainable construction standards would be incorporated at the replacement dwelling. As such a minor positive effect is expected in relation to SA objective 14: **climate change**. The policy is only supportive of homes which would be replacements and therefore is unlikely to support a net change in the number of people living rurally. Therefore, no change is likely in terms of the number of residents required to travel longer distances on a regular basis and the policy is unlikely to have a direct effect relating to air quality.

#### **Policy HC6: Residential sub-division of dwellings**

- 4.157 Policy HC6 sets out criteria relating to the sub-division of existing dwellings into two or more self-contained residential units.
- 4.158 A minor positive effect is expected for the policy in relation to SA objective 1: **housing** as it sets out requirements which would minimise the potential for unfit accommodation to result from inappropriate sub-division of properties. The protection that the policy includes for residential amenity (including issues of privacy and loss of daylight) is also likely to help ensure residential satisfaction with local living conditions and therefore a minor positive effect is expected in relation to SA objective 5: **vibrant communities**.
- 4.159 Proposals for sub-division of properties are required to have regard to the relationship of the development site to the plan's settlement hierarchy, including accessibility to shops, services and facilities. As such, the policy is likely to help provide new residents with a good level of access to employment opportunities and services and facilities at existing settlements. This approach is likely to help limit the need to travel by car and may encourage travel by active modes which could benefit public health. As such, minor positive effects are expected in relation to SA objectives 2: **health**, 6: **services and facilities**, 10: **air quality**, 14: **climate change** and 16: **employment**. However, as the policy also requires that adequate vehicular access and car parking are provided at new developments of this type, the potential impact on modal shift may be limited. Therefore, the minor positive effects expected in relation to SA objectives 2: **health**, 10: **air quality** and 14: **climate** are likely to be combined with minor negative effects.
- 4.160 Minor positive effects are expected for the policy in relation to SA objectives 8: **landscapes/townscapes** and 9: **historic environment**. The policy requires that sub-divisions should be considerate of the potential impact on the character and appearance of the immediate neighbourhood in terms of design, scale, form and footprint, and prevents any significant increase in size. These requirements should help to protect landscape character, as well as the setting of heritage assets. The policy also requires the provision of refuse storage, which may help to facilitate higher levels of recycling. A minor positive effect is therefore expected in relation to SA objective 15: **waste**.
- 4.161 Allowing for the sub-division of existing dwellings, where living conditions are to be maintained to a high standard, is seen as an efficient use of land in the District. A minor positive effect is therefore also expected for this policy in relation to SA objective 13: **efficient land use**.

#### **Policy HC7: Annexes for dependents or carers**

- 4.162 Policy HC7 addresses the development of annexes to accommodate dependants or full-time carers. Minor positive effects are expected for the policy in relation to SA objective 1: **housing** as the policy would help to make existing properties suitable for those who would need a full-time carer. This type of provision is likely to help address the needs of specific groups in Stroud District including older people and people with disabilities. Therefore, a minor positive effect is also expected in relation to SA objective 3: **social inclusion**. As the policy is likely to provide housing which is suitable for people with health problems a minor positive effect is also expected in relation to SA objective 2: **health**.
- 4.163 By requiring new annexes to be closely related to the main dwelling and have shared access arrangements, it is likely that the amenity of surrounding properties would be maintained. As

such a minor positive effect is also expected in relation to SA objective 5: **vibrant communities**. Allowing for annexes for dependents is likely to make best use of the existing housing stock in Stroud District, limiting the need for the delivery of new specialist housing. A minor positive effect is therefore also expected in relation to SA objective 13: **efficient land use**.

#### **Policy HC8: Extensions to dwellings**

- 4.164 Policy HC8 sets out criteria relating to the extension of or alterations to residential properties.
- 4.165 A minor positive effect is expected for the policy in relation to SA objective 1: **housing** considering that it should help to ensure the protection of the quality of the housing stock and allows for appropriate extensions to meet the needs of residents. The policy would prevent development which would result in sites becoming overdeveloped or cramped. This is likely to help ensure residential amenity as well as a higher standard of living conditions are maintained for surrounding buildings as well as for future occupiers of the site. As such a minor positive effect is also expected in relation to SA objective 5: **vibrant communities**.
- 4.166 Minor positive effects are also expected for the policy in relation to SA objectives 8: **landscapes/townscapes** and 9: **historic environment**. The policy is expected to help ensure that any potential extensions to existing residential development are in keeping with the scale and character of the existing setting of the property.
- 4.167 As the policy requires proposals for extensions to take opportunities for enhancing energy efficiency, a minor positive effect is expected in relation to SA objective 14: **climate change**. As part of its promotion of developments which take opportunities achieve higher levels of sustainability, the policy is supportive of the inclusion of permeable paving. This measure will help to make the District less vulnerable to flood risk. Therefore, a minor positive effect is also recorded in relation to SA objective 12: **flooding**.
- 4.168 The likely sustainability effects of Delivery Policies DHC5, DHC6 and DHC7 are described below.

**Table 4.8 SA findings for the third group of Delivery Policies relating to homes and communities**

SA Objective	DHC5 – Wellbeing and healthy communities	DHC6 – Protection of existing open spaces and built indoor sports facilities	DHC7 – Provision of new open space and built and indoor sports facilities
SA 1: Housing	0	0	0
SA 2: Health	++	++	++
SA 3: Social inclusion	+	0	0
SA 4: Crime	0	0	0
SA 5: Vibrant communities	+	+	+
SA 6: Services and facilities	+	+	+
SA 7: Biodiversity/geodiversity	+	+	+
SA 8: Landscapes/townscapes	0	+	+
SA 9: Historic environment	0	+	0
SA 10: Air quality.	+	0	+
SA 11: Water quality	0	0	0
SA 12: Flooding	0	+	+
SA 13: Efficient land use	0	+	0
SA 14: Climate change	+	0	+
SA 15: Waste	0	0	0
SA 16: Employment	0	0	0
SA 17: Economic growth	0	0	0

**Policy DHC5: Wellbeing and healthy communities**

- 4.169 Policy DHC5 seeks to improve the health and wellbeing of local communities by supporting proposals that encourage healthier lifestyles and more sustainable neighbourhoods. Developments on strategic allocation sites should include a robust Health Impact Assessment (HIA) to help mitigate any potentially adverse effects on the health and wellbeing of new or existing communities. Major developments are required to meet various criteria to ensure the health and wellbeing of residents. Therefore, a significant positive effect is expected in relation to SA objective 2: **health**.
- 4.170 The policy aims to ensure that development layouts support the mental and physical wellbeing of all residents, including people with disabilities, by encouraging safe and active lifestyles. As well as helping to meet the needs of most sections of the local community the policy is therefore also expected to improve the satisfaction of people within their neighbourhoods as places to live. Therefore, minor positive effects are likely in relation to SA objectives 3: **social inclusion** and 5: **vibrant communities**. The provision of allotments, community orchards and networks of multi-

functional green infrastructure are included as potential ways in which the requirements for major development proposals might be met. As such, a minor positive effect is expected for the policy in relation to SA objective 7: **biodiversity/geodiversity**.

- 4.171 Policy DHC5 also seeks to ensure that proposals provide convenient and sustainable access to local health care facilities. The policy supports the co-location of health facilities with other services and facilities, which could further reduce the need to travel. Furthermore, the policy requires that proposals should seek to include safe walking, cycling, riding and mobility scooter routes for residents. Therefore, minor positive effects are expected in relation to SA objectives 6: **services and facilities**, 10: **air quality** and SA objective 14: **climate change**.
- 4.172 The policy aims to improve access to fresh and locally sourced food. This approach is not only likely to benefit local health and well-being but could also further limit detrimental impacts relating to air quality and carbon emissions by reducing food miles.

#### **Policy DHC6: Protection of existing open spaces and built and indoor sports facilities**

- 4.173 Policy DHC6 seeks to protect against the loss, devaluation of, or loss of accessibility to, of existing open space within settlements, as well as outdoor and indoor recreation and sports facilities. The exception to this is where there is an identified surplus in the catchment area, or replacement of the facility is provided to benefit the community. The policy should therefore help to ensure that there is sufficient open space and sport facilities for people living in the local community, which is likely to help secure benefits relating to mental and physical health. Significant positive effects are therefore expected in relation to SA objective 2: **health**. The policy should also help to protect local community facilities and provide residents with high quality living conditions; therefore minor positive effects are expected in relation to SA objective 5: **vibrant communities**, and SA objective 6: **services and facilities**.
- 4.174 The policy also aims to ensure that no harm is caused by new development to spaces or facilities that form part of an area of wildlife value or green corridor. A minor positive effect is therefore expected in relation to SA objective 7: **biodiversity/geodiversity**.
- 4.175 The policy approach seeks to ensure that new development does not cause any harm to spaces or facilities that contribute to the identity of the settlement. This approach is considerate of open spaces which contribute to the setting of important buildings or scheduled ancient monuments, or spaces that are of historic or cultural value in their own right. As such, minor positive effects are recorded in relation to SA objectives 8: **landscape/townscape** and 9: **historic environments**.
- 4.176 Maintaining areas of open space in Stroud will protect areas which have an important function in terms of allowing the infiltration of surface water. A minor positive effect is therefore expected in relation to SA objective 12: **flooding**. Limiting development on greenfield land, as a result of protecting open spaces, may also direct more new development to brownfield land and therefore a minor positive effect is also expected in relation to SA objective 13: **efficient land use**.
- 4.177 Protecting existing open spaces in Stroud may result in certain areas being deemed unsuitable for new development which developers might otherwise consider viable. However, it is expected that a suitable number of sites will be identified in the other locations in the District to provide for the required housing need over the plan period. It is also likely that sites can be identified to provide economic growth aligned to the identified required level of residential development. Therefore, the policy is not expected to an adverse impact in terms of housing or employment land delivery.

#### **Policy DHC7: Provision of new open spaces and built and indoor sports facilities**

- 4.178 Policy DHC7 sets out quantity and access standards for open space and indoor sports facilities in relation to new residential development in Stroud. Ensuring that people have appropriate access to these types of facilities is likely to help enhance the mental and physical wellbeing and the overall health of local people. A significant positive effect is therefore expected in relation to SA objective 2: **health**. A minor positive effect is expected in relation to SA objective 6: **services and facilities**.
- 4.179 Requiring residential developments to provide new open space and sports facilities as well as linking to any existing provisions is likely to help ensure that residents experience a high-quality environment. Therefore, a minor positive effect is expected in relation to SA objective 5: **vibrant communities**. It is likely that where new natural green space is provided at residential



developments, this could allow for ecological improvements, including improved habitat provision and connectivity. As such a minor positive effect is expected in relation to SA objective 7: **biodiversity/geodiversity**. The incorporation of areas of open space may also improve the setting of built development; therefore, a minor positive effect is expected in relation to SA objective 8: **landscape/townscape**. Areas of open space within new developments will also prevent the proliferation of impermeable surfaces in Stroud, to the benefit of local flood risk management. A minor positive effect is therefore expected in relation to SA objective 12: **flooding**.

- 4.180 Requiring residential development to have a good level of access to nearby open spaces and sports facilities is also likely to reduce the need to travel, including by private vehicle, in the plan area. Minor positive effects are therefore expected in relation to SA objectives 10: **air quality** and 14: **climate change**.

## SA Findings for Pre-submission Draft Local Plan Policies: Economy and infrastructure

- 4.181 The Pre-Submission Draft Local Plan contains three Core Policies and 16 Delivery Policies which set out the approach to achieving sustainable economic growth, and the delivery of jobs and infrastructure throughout the District. Due to the relatively large number of policies included in this chapter of the Pre-submission Draft Local Plan, the presentation of effects is divided between those relating to the Core Policies and those relating to the Delivery Policies.
- 4.182 The potential sustainability effects of Core Policies CP11 to CP13 are set out below.

**Table 4.9 SA findings for the Core Policies relating to Economy and infrastructure**

SA Objective	CP11 – New employment development	CP12 – Town centres and retailing	CP13 – Demand management and sustainable travel measures
SA 1: Housing	+?	+	0
SA 2: Health	0	+	+
SA 3: Social inclusion	0	+	+
SA 4: Crime	0	0	0
SA 5: Vibrant communities	0	+	+
SA 6: Services and facilities	0	++	+
SA 7: Biodiversity/geodiversity	+	0	0
SA 8: Landscapes/townscapes	+	0	0
SA 9: Historic environment	+	0	0
SA 10: Air quality.	+/-	+	++/-
SA 11: Water quality	0	0	0
SA 12: Flooding	+	0	0
SA 13: Efficient land use	+/-	0	0
SA 14: Climate change	+/-	+	++/-
SA 15: Waste	0	0	0
SA 16: Employment	++	+	+
SA 17: Economic growth	++	+	+

### Policy CP11: New employment development

- 4.183 Policy CP11 seeks to ensure that a range and choice of employment sites are available to allow for a degree of self-containment at the District's settlements. Mixed use at existing employment sites is to be permitted where the employment use of part of the site would be intensified. This could allow for sites of this nature to contribute to housing requirements in Stroud District, dependent

upon the types of proposals which come forward. As such an uncertain minor positive effect is expected in relation to SA objective 1: **housing**.

- 4.184 This policy is supportive of new or intensification of existing industrial or business uses where green infrastructure delivery is incorporated. This is likely to have ecological benefits, in terms of providing new habitat or allowing for habitat connectivity and therefore a minor positive effect is expected in relation to SA objective 7: **biodiversity/geodiversity**. Employment development is also required by Policy CP11 to be of a scale or type that would not harm the character or appearance of the site. It is likely that this element of the policy would help to ensure that new employment development is provided in a manner which protects landscape setting and the setting of heritage assets in the plan area. Minor positive effects are therefore expected in relation to SA objective 8: **landscape/townscape** and SA objective 9: **historic environment**.
- 4.185 The policy supports diversification of the rural economy, which could result in less sustainable locations coming forward for employment development and potentially longer distances travelled to work. However, the policy supports live-work units and requires new and intensified employment uses to be accessible by public transport which could limit the need to travel by private vehicle. Furthermore, the policy also promotes employment development which makes use of renewable energy sources and adapts to climate change. A mixed minor positive and minor negative effect is therefore expected in relation to SA objective 10: **air quality** and SA objective 14: **climate change**. As new employment development should include adaptations to climate change, including SuDS, a minor positive effect is also expected in relation to SA objective 12: **flooding**. As the policy provides for a mix of new strategic site allocations as well as intensification of existing employment sites, there is likely to be some use of greenfield sites and previously developed land. As such a mixed minor positive and minor negative effect is also expected in relation to SA objective 13: **land use**.
- 4.186 The overall aim of the policy is to support sustainable employment growth in Stroud District. This includes the allocation of strategic employment sites which will provide an increased level of certainty for local employers who may be considering investment. The achievement of more self-contained settlements in terms of access to jobs will help to ensure a higher proportion of residents have a good level of access to employment opportunities. Access to employment opportunities for people at more rural locations is also supported through diversification of the rural economy. As such significant positive effects are expected in relation to SA objectives 16: **employment** and SA objectives 17: **economic growth**.

#### **Policy CP12: Town centres and retailing**

- 4.187 Policy CP12 sets out a retail hierarchy which will determine the location of town centre uses. The policy seeks to widen the range of uses within the District's centres, which will include housing where appropriate. This policy could therefore help contribute to meeting the housing needs of Stroud District and a minor positive effect is expected in relation to SA objective 1: **housing**.
- 4.188 The retail hierarchy set out for the District seeks to guide the delivery of town centre uses to the most appropriate location. Those town centres at the top of the hierarchy are those which accommodate the largest proportion of residents and at which the service offer is strongest, including healthcare and other community facilities. It is expected that continuing to focus the majority of town centre uses in these areas would provide the highest number of residents with easy access to a wide range of services and facilities and may enable people to take a smaller number of trips and make more use of active modes of travel. Providing good access to services and facilities may also promote sense of community ownership and cohesion among residents. Minor positive effects are therefore expected for SA objectives 2: **health**, and 3: **social inclusion**. The positive effects expected in relation to SA objectives 5: **vibrant communities** and 6: **service and facilities** are likely to be significant considering that the policy directly addresses town centre vitality and uses at these locations which is likely to include shopping and new services to meet the day-to-day needs of residents.
- 4.189 Focussing most town centre uses at the settlements which have the strongest sustainable transport links is likely to reduce the need to travel by car. Considering the contribution that private vehicle travel makes towards air pollution and greenhouse gas emissions, minor positive effects are therefore expected in relation to SA objectives 10: **air quality** and 14: **climate change**. The policy allows for retail and other uses at locations which are not in line with the

retail hierarchy where unsustainable trip generation would not result such as locations that are accessible and have good connections to town centres. This should help to ensure that adverse impacts relating to these SA objectives should be limited. In addition, new local centres will be established within large new settlements and urban extensions, where they are not within easy walking distance of existing shops and services.

- 4.190 Focussing most town centre uses at the District's larger centres will also direct the associated employment opportunities to those areas. Considering that these are the areas which are considered to be most accessible to the highest number of residents in the District a minor positive effect is therefore expected in relation to SA objectives 16: **employment**. It is expected that the policy would also help to encourage footfall to the town centre locations and thereby support the contribution of these locations to the economy of Stroud District. Considering that the overarching purpose of the policy is to ensure the vitality of town centres which contribute substantially to success of the local economy, a significant positive effect is also expected in relation to SA objectives 17: **economic growth**.

### **Policy CP13: Demand management and sustainable travel measures**

- 4.191 Policy CP13 requires major schemes to provide for a variety of forms of transport as alternatives to the car, and to improve the infrastructure network including facilities for pedestrians and cyclists. It is expected that increased uptake of these more active modes of transport could help improve public health in the District and therefore a minor positive effect is expected in relation to SA objective 2: **health**.
- 4.192 While this policy would not directly strengthen the provision of services and facilities in Stroud District, improving the transport network should indirectly help to improve access to these provisions. It is also expected that the policy would have associated benefits in terms of improved integrations, social cohesion and sense of ownership through improved access to services and facilities. Minor positive effects are therefore expected for Policy CP13 in relation to SA objectives 3: **social inclusion**, 5: **vibrant communities** and 6: **services and facilities**.
- 4.193 By requiring development proposals to consider opportunities for sustainable transport improvements before incorporating increases in road network capacity, it is likely this policy would have positive effects in terms of reducing congestion, air pollution and the release of greenhouse gases. The policy seeks to minimise the distance people need to travel and encourage modal shift. While it also requires development to make provisions which could facilitate ongoing car use, such as appropriate levels of vehicular parking, the overall approach of the policy is to reduce car use and increase the use of sustainable transport. In addition, measures to avoid traffic related environmental problems should benefit air quality and help to avoid pockets of pollution. As such, significant positive effects are expected in relation to SA objectives 10: **air quality** and 14: **climate change**.
- 4.194 The measures in the policy seek to ensure that employment development is accessible for all residents, including those without access to a car. Improving infrastructure will also help to ensure the continued viability of the local economy. Minor positive effects are therefore expected for Policy CP13 in relation to SA objective 16: **employment** and SA objective 17: **economic growth**.
- 4.195 The potential sustainability effects of Delivery Policies EI1 to EI8 are described below.

**Table 4.10 SA findings for the first group of Delivery Policies relating to Economy and infrastructure**

SA Objective	EI1 – Key employment sites	EI2 – Regenerating existing employment sites	EI2a – Former Berkeley Power Station	EI4 – Development at existing employment sites in the countryside	EI5 – Farm and forestry enterprise diversification	EI6 – Protecting individual and village shops, public houses and other community uses	EI7 – Primary Shopping Areas	EI8 – Town Centres
SA 1: Housing	0	+	0	+	0	0	0	0
SA 2: Health	0	0	0	0	0	+	0	+
SA 3: Social inclusion	0	0	0	0	0	++	0	+
SA 4: Crime	0	0	0	0	0	0	0	0
SA 5: Vibrant communities	+	+	0	0	0	+	+	+/-?
SA 6: Services and facilities	+	+	0	0	0	++	0	+
SA 7: Biodiversity/geodiversity	0	+/-?	--?	+	+	0	0	0
SA 8: Landscapes/townscapes	0	+/-?	?	+	+	0	+	+
SA 9: Historic environment	0	+/-?	0	+	+	0	+	+
SA 10: Air quality.	+/-	+/-	-	+/-?	+/-?	+	0	+
SA 11: Water quality	-	+	0	0	+	0	0	0
SA 12: Flooding	-	+/-?	-	+	0	0	0	0
SA 13: Efficient land use	0	+	+	+/-	+	+	0	+
SA 14: Climate change	+/-	+/-	+/-	+/-?	+/-?	+	0	+
SA 15: Waste	0	0	0	0	0	0	0	0
SA 16: Employment	++	++	++	++	+	+	0	+
SA 17: Economic growth	++	++	++	++	++	0	+	+

**Policy EI1: Key employment sites**

4.196 The policy sets out the key employment sites to be retained for B and E(g) Class Uses in the District. These sites are located mostly at the M5 corridor (Junction 12) by (Quedgeley), Junction 13 by Stonehouse and within the Stroud Valleys. Additional sites are located towards the southern part of the District by Cam and Dursley, by Berkeley and Sharpness and by Wotton-under-Edge.

Many of the key employment sites are well-related to the larger settlements in the District including Tier 3a and higher order settlements which provide access to a good range of local services and facilities<sup>53</sup> which can be made use of by employees. Furthermore, it is stated in the policy that ancillary uses specifically designed to support the primary use of each site will be supported at these sites. This could include some new service provision. As such minor positive effects are expected in relation to SA objective 5: **vibrant communities** and SA objective 6: **services and facilities**.

- 4.197 In addition to protecting existing employment uses, the policy would allow only for some ancillary uses specifically designed to support the primary use at the sites identified. It is not expected that this level of growth would have substantial additional effects in terms of the natural and built environmental over and above those which have already occurred.
- 4.198 Considering that many of the sites identified in this policy are well-related to the higher order settlements in District, it is likely that the employment opportunities provided at the sites will be accessible for a high number of residents and safeguarding employment uses in these locations may reduce the need for out commuting. These locations are likely to be those at which the potential for car-sharing or strengthening of sustainable transport provision is also likely to be strongest. Given that the focus of the policy is on safeguarding existing employment sites, rather than new employment development, increases in air pollutants and greenhouse gas emissions are not expected. Overall, a minor positive effect is expected in relation to SA objectives 10: **air quality** and 14: **climate change**.
- 4.199 The policy focuses on safeguarding the existing key employment sites in the District but there could also be some additional employment development and the development of ancillary supporting uses at these locations. Some of the sites to the west by the River Severn (EK16) and within the Stroud Valleys along the River Frome contain portions of land which fall within flood zones 2 and 3. Furthermore, some of the sites within the Stroud Valleys and the site by Minchinhampton also fall within a Source Protection Zone, meaning that construction works or any intensified employment use at the site could result in detrimental impacts in terms of a water quality. However, it is recognised that the sites are already in employment use and that the focus of the policy is on safeguarding rather than additional development. As such the negative effects expected in relation to SA objective 11: **water quality** and SA objective 12: **flooding** are minor.
- 4.200 The policy approach would safeguard key employment sites which support economic growth in Stroud District. Land is to be protected for employment use at locations which allow for access to the motorway or A-roads and this is likely to prove attractive to future investors. Employment development at many of these locations is also easily accessible to the larger settlements and residents at these locations. As such significant positive effects are expected in relation to SA objective 16: **employment** and SA objective 17: **economic growth**.

### **Policy EI2: Regenerating existing employment sites**

- 4.201 Policy EI2 would allow for regeneration of existing employment sites in the District for mixed-use development. This could include new housing provision and therefore a minor positive effect is expected in relation to SA objective 1: **housing**. As the policy could also support the provision of some new services and facilities as part of mixed use redevelopments, minor positive effects are also expected in relation to SA objectives 5: **vibrant communities** and 6: **services and facilities**.
- 4.202 The sites identified at which change of use would be allowed are mostly focussed within the Stroud Valleys by Stroud as well as one site at Kingswood within the Wotton cluster. These areas are in close proximity of Selsley Common SSSI, Minchinhampton Common SSSI and Rodborough Common SSSI and SAC. The HRA for the plan<sup>54</sup> identified likely significant effects for the policy alone relating to urban effects for Rodborough Common SAC. In combination likely significant effects were also identified in relation to water issues for the Severn Estuary SAC/SPA/Ramsar site, in relation to air quality for the Cotswolds Beechwoods SAC and Rodborough Common SAC and in relation to recreation for Rodborough Common SAC. However, when considering the policy

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<sup>53</sup> As per Policy CP3 of the Pre-submission Draft Local Plan

<sup>54</sup> Footprint Ecology on behalf of Stroud District Council (2021) Habitats Regulations Assessment of the Stroud District Local Plan Review Pre-submission Draft Plan

requirements set out in the plan and additional traffic modelling undertaken, the adverse effects on integrity of these designated sites were ruled out through the appropriate assessment.

- 4.203 Redevelopment of these sites may result in the potential for increased recreational pressures where new residential uses are proposed that may adversely affect the other biodiversity sites identified, which were not subject to the assessment through the HRA. The majority of sites within the Stroud Valleys are also located within or close to the Industrial Heritage Conservation Area as well as within close proximity of the Cotswolds AONB, the extent of which encircles much of the Stroud Valleys. The unsympathetic redevelopment of the site at Kingswood could impact upon the Conservation Area there. The policy states that redevelopment proposals at these sites should be able to demonstrate environmental and/or conservation benefits, which could have positive impacts in terms of habitat provision or landscape setting or the setting of heritage assets. As such mixed minor positive and minor negative effects are expected in relation to SA objectives 7: **biodiversity/geodiversity**, 8: **landscape/townscape** and 9: **historic environment**.
- 4.204 The redevelopment of the sites in question to provide mixed-use development is likely to result in the new residents at these locations having a reduced need to travel on a regular basis, as there would be services and facilities and potential employment opportunities within the site. As such, minor positive effects are expected in relation to SA objectives 10: **air quality** and 14: **climate change**. Allowing for the redevelopment of sites to support mixed use development is also likely to facilitate a more efficient pattern of development in Stroud District, particularly where some of the employment uses at these sites have ceased to be viable. As such a minor positive effect is also expected in relation to SA objective 13: **efficient land use**.
- 4.205 The requirement for redevelopment of the identified sites to demonstrate environmental and/or conservation benefits could include remediation relating to water courses in Stroud District. This may help to reduce local flood risk and the potential for water pollution as development proceeds. Many of the sites at which redevelopment would be supported within the Stroud Valleys are located within or partially within flood zone 2 and 3. The delivery of new housing development at these locations could increase the number of residents at risk of flooding in the District, depending on the incorporating of mitigation measures. As such a minor positive is expected in relation to SA objective 11: **water quality** and a mixed (minor positive and minor) negative effect is expected in relation to SA objective 12: **flooding** although this is uncertain.
- 4.206 The policy requires that redevelopment of the identified sites should provide the same employment opportunities for the local community as existed when the employment space was previously used. There should therefore be no net loss of employment space and the redevelopment of the sites could increase the quality of the employment space now provided which could help attract economic investment to the area. The policy is also likely to provide good access for residents at the housing at each site to new and existing employment opportunities. As such significant positive effects are expected in relation to SA objective 16: **employment** and SA objective 17: **economic growth**.

#### **Policy EI2a: Former Berkeley Power Station**

- 4.207 The policy retains the Former Berkeley Power Station for office, B2 and B8 employment uses and for employment related training and education purposes. The site is now subject to ongoing re-use and redevelopment as the Gloucestershire Science and Technology Park. It is adjacent to the Severn Estuary SAC, SPA and Ramsar site, as well Summer House Grade II Listed Building. There is therefore the potential for refurbishment of the decommissioned nuclear site to result in adverse impacts in relation to the nearby national and international biodiversity designation. While the close proximity of the site to the listed building identified might otherwise mean that there is also potential for impacts on its setting, the heritage impact assessment work undertaken as part of the SALA for Stroud District indicates that the site can be developed without harm to a designated heritage asset. A potential significant negative effect is therefore identified in relation to SA objectives 7: **biodiversity/geodiversity**. This effect are uncertain dependent upon the detailed design of the proposals that come forward for the site.

- 4.208 The site is not located within an area which has been assessed as part of the landscape sensitivity work<sup>55</sup> for the District; however any redevelopment at the site could have either positive or negative landscape impacts, depending on the nature and design of the proposal. As such, an uncertain effect is recorded in relation to SA objective 8: **landscape/townscape**.
- 4.209 The Former Berkeley Power Station site is not located in close proximity to any of the larger settlements in Stroud District and as such a limited number of future employees at the site are likely to make use of sustainable modes of transport to access employment opportunities. A minor negative effect is therefore expected in relation to SA objectives 10: **air quality** and 14: **climate change**. As the uses promoted at the site may include renewable and low carbon energy generation, the minor negative effect expected in relation to SA objective 14 is likely to be combined with a minor positive effect.
- 4.210 The site sits in close proximity to the River Severn. Portions of the site fall within Flood Zone 2 and Flood Zone 3. The new development at this site would therefore be at risk of flooding events and therefore a minor negative effect is expected in relation to SA objective 12: **flooding** although it may be possible to incorporate mitigation into development proposals for the site.
- 4.211 Policy EI3 prevents the redevelopment of the site for alternative uses unrelated to employment and training. The land is now subject to ongoing re-use and redevelopment as the Gloucestershire Science and Technology Park and employment uses have been demonstrated in the recent past to be viable at this location. As such the policy supports the re-use of the site for uses which have precedent at this location. A minor positive effect is expected in relation to SA objective 13: **efficient land use**.
- 4.212 As the policy would redevelop an existing site for employment use, a significant positive effect is expected in relation to SA objectives 16: **employment** and 17: **economic growth**. The policy supports the use of the site to host a prototype fusion power plant and associated facilities as part of the STEP (Spherical Tokamak for Energy Production) UK programme. If the bid for this programme at the site is successful, it would be used to create thousands of highly skilled jobs in the area. The site is also to be used to support the ongoing provision of educational, training and research facilities which is likely to help strengthen educational attainment and skill levels in Stroud District.

#### **Policy EI4: Development at existing employment sites in the countryside**

- 4.213 Policy EI4 supports the continuation of sustainable economic development in rural areas. The policy requires that proposals for further development at rural employment sites must protect the amenity of adjoining land uses, with particular regard for residential uses. Therefore, a minor positive effect is expected in relation to SA objective 1: **housing**. The policy also requires that consideration is given to the visual impact of such proposals on local character. Proposals should also secure environmental improvements such as landscaping, enhancing biodiversity and the delivery of SuDS. Minor positive effects are therefore also expected in relation to SA objectives 7: **biodiversity/geodiversity**, 8: **landscapes/townscapes**, 9: **historic environment** and 12: **flooding**. In all cases the potential positive effects on these SA objectives are recorded as uncertain as, while the policy relates to proposals for new development in rural locations which could have particular sensitivities in relation to these objectives, the policy also includes requirements which would limit the potential for these adverse impacts to result.
- 4.214 The policy requires that proposals for new development at rural employment sites should not generate significant traffic movement and volume. This approach is likely to limit the potential for adverse impacts relating to air pollutants and greenhouse gas emissions associated with private vehicle travel. It is, however, recognised that travel to rural locations, in general is likely less likely to be via sustainable modes of transport. As such an overall mixed (minor positive and minor negative) effect is expected in relation to SA objectives 10: **air quality** and 14: **climate change**.
- 4.215 As the policy is supportive of the re-use of employment sites which includes infilling of sites and extension of existing buildings it could promote the more efficient use of land in Stroud District. However, the policy could also permit the extension of existing rural employment site boundaries

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<sup>55</sup> White Consultants on behalf of Stroud District Council (December 2016) *Stroud District Landscape Sensitivity Assessment*



which could result in the areas of greenfield land being lost to development. An overall mixed (minor positive and minor negative) effect is therefore expected in relation to SA objective 13: **efficient land use**.

- 4.216 The policy supports the maintenance of suitable employment land in the District and also the diversification of rural economy as new premises are needed to meet updated requirements. It also responds to Government changes to permitted development rules which allow for conversion of offices to residential under permitted development rights. Significant positive effects are therefore expected for the policy in relation to SA objectives 16: **employment** and 17: **economic growth**.

#### **Policy EI5: Farm and forestry enterprise diversification**

- 4.217 Policy EI5 supports proposals for the diversification of farms or forestry development in Stroud District where the existing uses continue to be supported. Diversification activities are to remain subsidiary to these uses with appropriate consideration for the rural setting. Proposals are required by the policy to be reflective of the existing development scale and form. They should also avoid adverse environmental impact in terms of biodiversity, landscape character qualities, air, soil and water qualities, as well as level of activity. Minor positive effects are therefore expected in relation to SA objectives 7: **biodiversity/geodiversity**, 8: **landscapes/townscapes**, 9: **historic environment** and 13: **water quality**.
- 4.218 Proposed development should also not generate traffic of a type or amount inappropriate for the rural roads, which is expected to limit any increase in the number of private vehicles travelling to these locations. However, considering that rural locations are generally less accessible by sustainable modes of transport, a mixed (minor positive and minor negative) effect is expected overall in relation to SA objective 10: **air quality** and SA objective 14: **climate change**. There is uncertainty attached to the positive effects for these SA objectives. It is recognised that rural locations could have particular sensitivities in relation to these objectives; however, the policy includes requirements which would limit the potential for these adverse impacts to result and uncertainty remains until detailed proposals for the specific sites which might be developed come forward.
- 4.219 Policy EI5 supports development which results in the re-use or replacement of existing buildings, which is likely to promote more efficient land use in Stroud District. A minor positive effect is therefore expected in relation to SA objective 13: **efficient land use**.
- 4.220 Considering that the policy's main focus is to support the health of the rural economy, a significant positive effect is expected in relation to SA objective 17: **economy**. It is likely that the policy will support employment creation in rural locations in sectors including tourism, sport and recreation. However, the opportunities created would be in rural areas which are less accessible for people without a car and the number of jobs created is likely to be fairly small. Overall, the positive effect expected in relation to SA objective 16: **employment** is therefore minor.

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

- 4.221 Policy EI6 seeks to prevent the loss of community facilities and services, thereby helping to ensure that the day-to-day needs of residents can continue to be met locally. It is expected that this policy would directly help retain service provision beyond defined retail and town centre boundaries of the District. The exception to this is where alternative facilities exist nearby or there is evidence that the current use is no longer viable or has no prospect of continuing to function. It is likely to protect the distribution of local community services to the benefit of social inclusion in Stroud District. There may also be some limited benefit relating to community ownership. Services protected could include healthcare and recreational provisions. Significant positive effects are therefore expected in relation to SA objectives 3: **social inclusion** and 6: **services and facilities**. Minor positive effects are expected in relation to SA objectives 2: **health** and 5: **vibrant communities**.
- 4.222 While the policy seeks to protect services and facilities at more rural locations, it does not relate to new development of this nature. Therefore, it is not expected to result in an increase in the number of journeys which are made to more rural locations on a regular basis. Furthermore, the policy requires proposals that would result in the loss of facilities to demonstrate that there are

similar facilities that are accessible by walking or cycling. The policy should therefore avoid the loss of facilities resulting in additional vehicle use and a minor positive effect is expected in relation to SA objectives 10: **air quality** and 14: **climate change**.

- 4.223 The policy would allow for the redevelopment of sites which are no longer viable for use as community uses. As such where these criteria are met redevelopment of brownfield sites would be supported. Therefore, a minor positive effect is expected in relation to SA objective 13: **efficient land use**.
- 4.224 The policy seeks to protect facilities such as village shops and community facilities which may have some small employment offer in the more rural areas of Stroud District. A minor positive effect is therefore expected in relation to SA objective 16: **employment**.

#### **Policy EI7: Primary Shopping Areas**

- 4.225 Policy EI7 establishes Primary Shopping Areas as areas in which the change of use from Class E at the ground level will only be permitted where it is demonstrated that such a change would not have adverse impacts on the vitality of the area. Given that the policy requires any changes to consider potential impacts relating to the character of the use proposed, it may help to protect townscapes in the District as well as the settings of heritage assets. A minor positive effect is therefore expected in relation to SA objectives 8: **landscapes/townscapes** and 9: **historic environment**
- 4.226 The policy is also expected to help maintain the health of the District's centres and increase footfall to these areas. Minor positive effects are therefore also likely in relation to SA objectives 5: **vibrant communities** and 17: **economic growth**.

#### **Policy EI8: Town Centres**

- 4.227 Policy EI8, similar to Policy EI7, seeks to protect the vitality of Town Centres in Stroud District. However, it specifically addresses the areas that are within Town Centres but are located outside of Primary Shopping Areas. The policy allows for change of use from E-class to pub or drinking establishment, amusement centres/arcades, laundrettes, community use, leisure and recreational uses, and residential uses, provided that the policy criteria are met. This may result in improved access to facilities that encourage physical exercise for people in these areas. A minor positive effect is therefore expected in relation to SA objective 2: **health**.
- 4.228 As well as health supporting facilities, Policy EI8 is likely to improve access to a range of services for residents by permitting change of use where the policy criteria are met. Improved service provision is likely to benefit social inclusion in Stroud District. Minor positive effects are therefore expected in relation to SA objectives 3: **social inclusion** and 6: **services and facilities**. It is also likely that this approach is likely to improve the accessibility of services and facilities by sustainable modes of transport, considering the generally accessible nature of town centre locations. Minor positive effects are therefore expected in relation to SA objective 10: **air quality** and SA objective 14: **climate change**.
- 4.229 The locations covered in Policy EI8 are of lesser importance in terms of retail provision than the Primary Shopping Areas in the District. It is expected that Policy EI8 could help to encourage footfall to these areas by allowing for change of use to complementary uses and therefore increasing the range of services available. The policy also requires that new uses contribute positively to the town centre in terms of community life. However, as the policy does not set out to protect a specific level of retail uses at these locations, there is potential that changes of use may result in the area becoming less attractive to shoppers. An uncertain mixed minor positive and minor negative effect is therefore expected in relation to SA objective 5: **vibrant communities**.
- 4.230 The policy requires that overall town centre character is maintained and no detrimental effect on the visual or other special character result as changes of use occur. Minor positive effects are therefore expected in relation to SA objective 8: **landscapes/townscapes** and SA objective 9: **historic environment**.
- 4.231 The policy's support for changes of use would include new service provision which is likely to contribute positively to the town centre in terms of increased levels of expenditure. It is also possible that new service provision would allow for the creation of some new employment

opportunities, although these could be greater or less than the retail uses. Uncertain minor positive effects are therefore expected in relation to SA objective 16: **employment** and SA objective 17: **economic growth**.

4.232 The potential sustainability effects of Delivery Policies EI9 to EI12, Delivery Policy DEI1 and Delivery Policies EI13 to EI16 are described below.

**Table 4.11 SA findings for the second group of Delivery Policies relating to economy and infrastructure**

SA Objective	EI9 – Floorspace thresholds for Impact Assessment	EI10 – Provision of new tourism opportunities	EI11 – Providing sport, leisure, recreation and cultural facilities	EI12 – Promoting transport choice and accessibility	DEI1 – District-wide mode-specific strategies	EI13 – Protecting and extending our walking and cycling routes	EI14 – Provision and protection of rail stations and halts	EI15 – Protection of freight facilities at Sharpness Docks	EI16 – Provision of public transport facilities
SA 1: Housing	0	+	+	0	0	0	0	0	0
SA 2: Health	+	0	++	+	+	+	0	0	0
SA 3: Social inclusion	+	0	+	+	+	+	+	0	+
SA 4: Crime	0	0	0	0	0	0	0	0	0
SA 5: Vibrant communities	+	0	+	0	0	0	0	0	0
SA 6: Services and facilities	+	0	++	+	+	+	+	0	+
SA 7: Biodiversity/geodiversity	0	+	+	0	0	0	0	0	0
SA 8: Landscapes/townscapes	0	+	+	0	0	0	0	0	0
SA 9: Historic environment	0	+	+	0	0	0	0	0	0
SA 10: Air quality.	+	+/-	+/-	+	++	++	++	+	++
SA 11: Water quality	0	0	0	0	0	0	0	0	0
SA 12: Flooding	0	0	0	0	0	0	0	0	0
SA 13: Efficient land use	0	+	0	0	0	0	0	0	0
SA 14: Climate change	+	+/-	+/-	+	++	++	++	+	++
SA 15: Waste	0	0	0	0	0	0	0	0	0
SA 16: Employment	0	+	+	+	+	+	+	0	+
SA 17: Economic growth	++	++	0	+	0	0	+	++	0

### Policy EI9: Floorspace thresholds for Impact Assessment

- 4.233 Policy EI9 requires that certain larger proposals involving retail and leisure floorspace are supported by an Impact Assessment. Studies of this type will need to demonstrate that there would be no significant adverse impact in relation to viability of the town centre and wider catchment and investment in Stroud District as a result of the development. The protection of the District' town centres, including by limiting development that could adversely impact existing, committed or planned investment, is likely to have long-term beneficial impacts in terms of support the local economy. As such a significant positive effect is expected in relation to SA objective 17: **economic growth**.
- 4.234 Considering the strong sustainable transport links at the town centres, as well as the shorter journey times for a high number of residents to reach these locations, protecting town centres is likely to help promote travel by more sustainable modes. This is likely to include active travel. As such, minor positive effects are expected in relation to SA objective 2: **health**, SA objective 10: **air quality** and SA objective 14: **climate change**.
- 4.235 While the policy does not directly address new service provision in Stroud District, the protection the policy affords to town centre viability is also likely to help protect existing service provision considering that the highest concentration of provision is at these locations. Ensuring the accessibility of these provisions for a wide range of local people is likely to have associated benefits in terms of promoting social equality in the area. Minor positive effects are therefore expected in relation to SA objectives 3: **social inclusion** and 6: **services and facilities**. Positive effects are also likely in terms of helping to preserve the identity of the District's settlements. Therefore, a minor positive effect is expected in relation to SA objective 5: **vibrant communities**.

### Policy EI10: Provision of new tourism opportunities

- 4.236 Policy EI10 addresses the provision of new tourism development in Stroud District, with particular support for developments within the larger settlements. Some tourism-related development is also to be permitted at lower tier settlements or countryside locations, provided that certain criteria are met. It is likely that allowing for some tourism development at the smaller settlements and rural locations of Stroud District would support economic growth and regeneration at these locations. The tourism sector is considered to be of particular importance to the District given its natural and heritage assets which help to attract visitors to the area. As a such minor positive effect is expected in relation to SA objective 5: **vibrant communities** and a significant positive effect is expected in relation to SA objective 17: **economic growth**. The policy is likely to support some new employment opportunities in the tourism sector. As such, a minor positive effect is expected in relation to SA objective 16: **employment**.
- 4.237 The District contains numerous important biodiversity designations (such as the Severn Estuary SAC and SPA, the Rodborough Common SAC and Cotswold Commons and Beechwoods NNR), heritage assets (such as the Stroud Industrial Heritage Conservation Area) and potentially sensitive and designated landscape areas (including the Cotswolds AONB). New tourism-related development within rural locations in particular has the potential to result in adverse impacts in terms of habitats or the landscape setting. The policy, however, requires that biodiversity interest, character or appearance of the landscape and residential amenity should be protected when new tourism development is proposed. As such, a minor positive effect is identified in relation to SA objectives 1: **housing**, 7: **biodiversity/geodiversity**, 8: **landscapes/townscapes** and 9: **historic environment**. The policy also favours development proposals in rural locations which would re-use brownfield land and therefore a minor positive effect is expected in relation to SA objective 13: **efficient land use**.
- 4.238 Considering the more limited sustainable transport links in the rural areas, it is likely that some tourism development in those areas would result in an increase in private vehicle use. However, the policy states that new development of this type should take opportunities to make a location more sustainable in terms of supporting access by foot, by cycling or by public transport. As such mixed (minor positive and minor negative) effects are expected in relation to SA objectives 10: **air quality** and 14: **climate change**.

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

- 4.239 Policy EI11 sets out criteria to be applied to proposals for the provision of new or improvements to existing sports, cultural, leisure and recreational facilities. It is expected that this type of provision would help to address issues of public health through the increased uptake of physical activity and would also widen the range of services and facilities available locally. As such, significant positive effects are expected for this policy in relation to SA objectives 2: **health** and 6: **services and facilities**.
- 4.240 Improved access to these types of provisions is likely to provide space for cultural activities and therefore a minor positive effect is expected in relation to SA objective 5: **vibrant communities**. The policy requires that development of this type is to be delivered in a manner which accommodates people with disabilities, and therefore a minor positive effect is also expected in relation to SA objective 3: **social inclusion**.
- 4.241 It is recognised that the development of sport, leisure, recreation and cultural facilities has the potential to have impacts in terms of residential amenity, biodiversity interest, and the character and appearance of the surrounding area. The policy addresses these potential impacts through the criteria, requiring proposals to not harm the character and appearance of the area or local amenity, and to enhance any biodiversity interest. Minor positive effects are therefore expected in relation to SA objectives 1: **housing**, 7: **biodiverse/geodiversity**, 8: **landscape/townscape** and 9: **historic environment**.
- 4.242 The policy also requires that development proposals for sport, leisure, recreation and cultural facilities should be accessible to the sustainable transport links. This type of development is only to be permitted at more rural locations where it would serve a specific need, thereby reducing the potential for increased travel as a result of development in less accessible areas. However, the policy also sets out requirements for on-site vehicle parking at new facilities which could encourage some trips to be made by private vehicles, leading to increases in the release of air pollution and greenhouse gases from these sources. As such mixed (minor positive and minor negative) effects are expected in relation to SA objectives 10: **air quality** and 14: **climate change**.
- 4.243 It is expected that new and improved sports, cultural, leisure and recreational facilities could offer some limited employment opportunities in Stroud. As such a minor positive effect is expected in relation to SA objective 16: **employment**.

### Policy EI12: Promoting transport choice and accessibility

- 4.244 Policy EI12 requires that development is planned in line with the Sustainable Transport Hierarchy for the District. The promotion of modal shift through Policy EI12 is likely to benefit air quality and the District's contribution to climate change, by reducing car use and increasing walking, cycling and public transport use. While the policy includes a requirement reference to car parking provision, the emphasis is on keeping the level provided as low as possible and developers must justify the level of parking provided and demonstrate that it will not have a detrimental impact on the road network. As such, an overall minor positive effect is expected in relation to SA objectives 10: **air quality** and 14: **climate change**.
- 4.245 The policy places an emphasis on encouraging active travel within new developments and ensuring that a range of local facilities are accessible when new development is delivered. Minor positive effects are therefore expected in relation to SA objectives 2: **health**, 3: **social inclusion** and 6: **services and facilities**. Public health will also be benefitted by any improvements in air quality that result from modal shift.
- 4.246 The policy refers to proposals being required to contribute to schemes in the Stroud Infrastructure Delivery Plan, the Stroud Sustainability Transport Strategy and the Gloucestershire Local Transport Plan where appropriate. Contributions towards strategic transport infrastructure schemes should be reasonable and viable; therefore, such a requirement should not result in schemes not coming forward. The provision of new transport infrastructure in the District is seen as essential to supporting local economic growth. A minor positive effect is likely in relation to SA objective 17: **economic growth**. The delivery of high-speed broadband and other measures to support home working should further support economic growth and will support more flexible

working patterns in Stroud and a minor positive effect is also expected in relation to SA objective 16: **employment**.

#### **Policy DEI1: District-wide mode-specific strategies**

- 4.247 Policy DEI1 seeks to enhance sustainable travel opportunities for all in Stroud District. This includes prioritising investment in improvement schemes to create a connected network for walking and cycling. Bus improvements such as express bus corridors are also to be supported and improved interchange hubs should be incorporated to allow for seamless multi-modal connectivity. The policy is likely to make service provision and employment opportunities more accessible in the District. This is particularly likely to be the case for people who do not own a private vehicle. As such, minor positive effects are expected in relation to SA objectives 3: **social inclusion**, 6: **services and facilities** and 16: **employment**. Increased uptake of walking and cycling is likely to benefit public health in the plan area and therefore a minor positive effect is also expected in relation to SA objective 2: **health**.
- 4.248 The policy is expected to reduce the need to travel by private vehicle in Stroud District, thereby limiting the emission of air pollutants and greenhouse gases as new development is provided and occupied. The policy states that parking provision should be used as a policy lever to discourage car trips where viable sustainable alternatives exist, which is likely to further encourage modal shift. As such, significant positive effects are expected in relation to SA objectives 10: **air quality** and 14: **climate change**.

#### **Policy EI13: Protecting and extending our walking and cycling routes**

- 4.249 Policy EI13 encourages the extension of the walking and cycling network within the District. It directly supports development proposals that will provide new walking and cycling routes and routes that connect to established and proposed routes. Furthermore, development proposals that may significantly adversely impact existing walking and cycling routes are not to be permitted. There is potential for residents to use these routes to access key services and facilities or for recreational purposes. In some cases, the routes may provide better connectivity between settlements and residents in the District, decreasing the potential for social isolation. As such, minor positive effects are expected for the policy in relation to SA objectives 2: **health**, 3: **social inclusion** and 6: **services and facilities**. Additionally, the routes may also provide some residents with increased access to employment opportunities. As such, minor positive effects are also expected for the policy in relation to SA objective 16: **employment**.
- 4.250 The provision of and protection of these sustainable transport routes could reduce the dependency of some residents on transport by private car. Therefore, significant positive effects are expected for the policy in relation to SA objective 10: **air quality** and SA objective 14: **climate change** due to the potential for mitigation of poor air quality and CO<sub>2</sub> emissions.

#### **Policy EI14: Provision and protection of rail stations and halts**

- 4.251 Policy EI14 supports proposals for the opening or re-opening of passenger railway stations and halts, and the provision of rail freight facilities. This includes land safeguarded for a new passenger rail station on the Bristol-Birmingham line and support for the re-opening of the Sharpness branchline to passenger services. The policy would also prevent development which would affect the provision of new facilities of this type at Stonehouse (Bristol line) and Hunts Grove. Providing new infrastructure to support travel by rail is likely to help encourage modal shift in the District. Benefits are likely to result in terms of limiting air pollutants and greenhouse gases which might otherwise occur as residents travel by private vehicle. Significant positive effects are therefore expected in relation to SA objective 10: **air quality** and SA objective 14: **climate change**.
- 4.252 The provision of new rail facilities in Stroud District is likely to provide a wider range of residents with access to existing services and facilities as well as employment opportunities. As such, minor positive effects are expected in relation to SA objectives 3: **social inclusion**, 6: **services and facilities** and 16: **employment**. The provision of rail freight facilities is also likely to help make the area more attractive in terms of securing economic investment. A minor positive effect is therefore also recorded in relation to SA objective 17: **economic growth**.

4.253 Of the areas identified for rail facilities, development of the land at Stonehouse has the potential to adversely impact on the setting of the Listed Buildings on the other side of the A419. These areas have been assessed as part of the landscape sensitivity work undertaken for the District. However, it is assumed that any proposals that may come forward for rail developments in these locations would be subject to detailed assessment as part of the planning application and the current policy approach relates only to safeguarding the land. Negligible effects are therefore identified in relation to SA objectives 8: **landscapes/townscapes** and 9: **historic environment**.

#### **Policy EI15: Protection of freight facilities at Sharpness Docks**

4.254 Policy EI15 is supportive of development within Sharpness Docks which would benefit the viability of the docks for handling freight and shipping repairs. It is envisaged that the existing freight-only railway line at Sharpness Docks could potentially take freight off the roads in the future. This land is in close proximity to the Severn Estuary SPA, SAC and Ramsar site and Sharpness Docks Key Wildlife Site, as well as well as a number of Grade II Listed Buildings. Most of the land by the railway line has not been assessed as part of the landscape capacity work for the District. The policy requires that new development would not have a demonstrable detrimental impact on the environment. As such it is likely that new proposals would be prevented from having negative impacts in terms of the nearby biodiversity designations and heritage assets as well as the existing character of the area. Negligible effects are therefore expected in relation to SA objective 7: **biodiversity/geodiversity**, SA objective 8: **landscapes/townscapes** and **SA objective 9: historic environment**.

4.255 The development supported through this policy could limit the proportion of freight which is transported by HGVs in the plan area. As such, minor positive effects are expected in relation to SA objectives 10: **air quality** and 14: **climate change**. The Canal and River Trust vision for the Sharpness Docks Estate identifies land to the south of Sharpness Docks having the potential to be developed as an integrated distribution hub. It is likely that improvements to the freight facilities at this location would support future economic investment in this area. A minor positive effect is therefore also expected in relation to SA objective 17: **economy**.

#### **Policy EI16: Provision of public transport facilities**

4.256 This policy seeks to support the incorporation of public transport facilities at new developments. It is likely that this requirement would help to improve the accessibility of services and facilities and employment opportunities for a wider range of residents. The policy is likely to be of particular benefit to residents who do not own a private vehicle. Minor positive effects are therefore expected in relation to SA objectives 3: **social inclusion**, 6: **services and facilities** and 16: **employment**.

4.257 The policy is also likely to help promote modal shift in Stroud District. This is likely to reduce the emission of air pollutants and greenhouse gases and therefore significant positive effects are expected in relation to SA objectives 10: **air quality** and 14: **climate change**.

## **SA Findings for Pre-submission Draft Local Plan: Our environment and Surroundings**

4.258 The Pre-submission Draft Local Plan contains two Core Policies and 15 Delivery Policies which set out the approach to the environment and surroundings in the District. This includes the District's commitment to becoming carbon neutral by 2030 and becoming resilient to the effects of climate change. Due to the relatively large number of policies included in this chapter of the Pre-submission Draft Local Plan, the likely effects of the policies are summarised in groups across a number of tables.

4.259 The potential sustainability effects of Core Policies CP14 to CP15 and Delivery Policies ES1 to ES5 and Deliveries Policy DES1 and DES3 are described below.

**Table 4.12 SA findings for the Core Policies and first group of Delivery Policies relating to Our environment and Surroundings**

SA Objective	CP14 – High quality sustainable development	CP15 – A quality living and working countryside	ES1 – Sustainable construction and design	ES2 – Renewable or low carbon energy generation	DES3 – Heat supply	ES3 – Maintaining quality of life within our environmental limits	ES4 – Water resources, quality and flood risk	ES5 – Air quality	DES1 – Conversion of redundant agricultural, forestry and rural buildings
SA 1: Housing	+	++	-?	0	0	+	0	0	+
SA 2: Health	+	+/-	+	+	0	+	0	+	0
SA 3: Social inclusion	0	0	0	0	+	0	0	0	0
SA 4: Crime	+	0	0	0	0	+	0	0	0
SA 5: Vibrant communities	+	+	0	+	0	+	0	0	0
SA 6: Services and facilities	+	+/-	0	0	0	0	0	+	+
SA 7: Biodiversity/geodiversity	++	+	0	+/-?	0	0	+	+	+
SA 8: Landscapes/townscapes	++	+	0	+	0	0	+	+	+
SA 9: Historic environment	++	+	0	+	0	0	0	0	+
SA 10: Air quality	+	-	+	0	0	++	0	++	+
SA 11: Water quality	+	0	0	+	0	++	++	0	0
SA 12: Flooding	+	0	+	+	0	+	++	0	0
SA 13: Efficient land use	+	+	0	+	0	+	0	0	+
SA 14: Climate change	++	-	++	++	++	0	+	+	+
SA 15: Waste	+	0	+	0	0	0	+	0	0
SA 16: Employment	0	+	0	+	0	0	0	+	+
SA 17: Economic growth	+	++	-?	+	0	+	0	0	+

**Policy CP14: High quality sustainable development**

4.260 Policy CP14 supports high quality development, which protects, conserves and enhances the built and natural environment. The policy requires that the amenity of neighbouring properties should not be adversely affected by new development. This is expected to help to ensure the protection of a high standard of living conditions as well as the satisfaction of residents with their communities. As such, minor positive effects are expected in relation to SA objectives 1: **housing** and 5: **vibrant communities**. In addition, the policy criteria will combine to ensure that new housing is built to a high standard.



- 4.261 The policy is supportive of development which integrates areas of open space and sports provision and this is likely to help encourage physical activity among residents. The policy also supports the provision of allotments which might be used by residents as healthy, local food sources. A minor positive effect is therefore also expected in relation to SA objective 2: **health**. The design and layout of new development is required by the policy to assist crime prevention in the District and therefore a minor positive effect is recorded in relation to SA objective 4: **crime**. The support that the policy provides in relation to delivery of new community infrastructure at development sites is likely to result in some new service provision. Therefore, a minor positive effect is also expected in relation to SA objective 6: **services and facilities**.
- 4.262 The policy requires the protection and enhancement of the natural environment as one of its overarching themes. This is to include the retention, conservation and enhancement of important landscape, biodiversity and geodiversity features and therefore significant positive effects are expected in relation to SA objectives 7: **biodiversity/geodiversity** and 8: **landscape/townscape**. Developments should contribute to green infrastructure where this would be appropriate. The policy also requires that design of new development should be respectful of its surroundings including local topography, built environment and heritage. As such, a significant positive effect is also expected in relation to SA objective 9: **historic environment**.
- 4.263 It is required by the policy that unacceptable levels of air and water pollution should not result from new development. Development should also incorporate SuDS and avoid areas at risk of flooding, unless it is necessary and is made safe for its lifetime without increasing the risk of flooding elsewhere. Therefore, minor positive effects are expected in relation to SA objectives 10: **air quality**, 11: **water quality** and 12: **flooding**. Further benefits relating to air quality are likely to result from Policy CP14, considering that development should provide safe and convenient access to walking, cycling and public transport links. These criteria are likely to help encourage modal shift and may also have beneficial impacts relating to reducing carbon emissions. Therefore, a positive effect is also expected in relation to SA objective 14: **climate change**. The policy is also supportive of measures which would minimise energy use and maximise renewable energy production and as such the positive effect on this objective is recorded as significant.
- 4.264 The support that the policy provides for development which would result in the re-use of previously developed land, and higher densities where appropriate, means that a minor positive effect is expected in relation to SA objective 13: **efficient land use**. The re-use of brownfield land in Stroud District may result in the recycling of existing onsite materials and buildings and the policy is also supportive of development which would include facilities for the recycling and collection of waste. As such, a minor positive effect is expected in relation to SA objective 15: **waste**.
- 4.265 Policy CP14 also supports development which helps to achieve satisfactory provision of transport infrastructure. These types of provisions will be important in terms of securing economic investment in the District over the plan period. A minor positive effect is therefore expected in relation to SA objective 17: **economic growth**.

#### **Policy CP15: A quality living and working countryside**

- 4.266 Policy CP15 permits proposals outside of identified settlement development limits to allow for a living and working countryside, and to help meet identified housing needs or address demographic imbalances, where certain criteria are met. In certain circumstances the policy permits some new housing in more rural locations, including affordable homes at rural exception sites. A minor positive effect is expected in relation to SA objective 1: **housing**, considering that the policy should help meet housing need in the countryside.
- 4.267 It is recognised that development at more rural locations may have particular impacts in terms of established ecological networks and landscape character as well as the role landscape features play with regards the setting of heritage assets. The conversion of redundant or disused rural buildings is also supported but proposals should maintain the character of the original building and provide an enhancement to the immediate surrounding. The policy permits some development in the countryside; however this development is required to not have an adverse impact on natural assets, landscape character or heritage assets or their setting. Therefore, minor positive effects are expected in relation to SA objectives 7: **biodiversity/geodiversity**, 8:

**landscape/townscape** and 9: **historic environment**. The positive effect on SA objective 8 is expected to be significant because the overall purpose of the policy is to protect the separate identity of settlements and the overall quality of the countryside in Stroud District.

- 4.268 The policy is likely to support increased access to the countryside and sporting facilities at rural locations, meaning a minor positive effect is expected in relation to SA objective 2: **health**. Considering that residents of any new housing in the countryside that may result from the policy may have a reduced level of access to services and facilities, including healthcare, the minor positive effect is likely to be combined with a minor negative effect. A similar mixed minor positive effect and minor negative effect is expected in relation to SA objective 6: **services and facilities** considering that the policy is supportive of rural development that would support essential community facilities.
- 4.269 Overall, the development permitted in the countryside through this policy (which would include some new housing, service provision and the potential enhancement of economic opportunities) is likely to help improve resident's satisfaction with their surrounding at rural locations. Therefore, a minor positive effect is expected in relation to SA objective 5: **vibrant communities**.
- 4.270 Providing development at more rural locations is likely to result in increased trips made by private vehicle considering the reduced levels of access these areas provide to existing services and facilities and employment opportunities. A minor negative effect is therefore expected in relation SA objective 10: **air quality** and SA objective 14: **climate change**.
- 4.271 The policy is supportive of the delivery of development through the re-use of redundant or disused rural buildings. As such a minor positive effect is expected in relation to SA objective 13: **efficient land use**. The policy is also supportive of development which is essential to support new employment uses at rural locations. Development in the countryside is to be supported where it would be essential to the maintenance or enhancement of a sustainable farming or forestry enterprise within the District. It is likely that this type of development would support opportunities for the diversification of the rural economy. As such a minor positive effect is expected in relation to SA objective 16: **employment** and a significant positive effect is expected in relation to SA objective 17: **economic growth**.

#### **Policy ES1: Sustainable construction and design**

- 4.272 Policy ES1 seeks to meet the Council's Carbon Neutral 2030 commitments by supporting sustainable design and construction in new developments. The policy requires that new development aims to achieve net-zero carbon emissions by improving the efficiency of building designs with consideration for Part L 2013 Building Regulations. Other requirements include reducing the potential for overheating of new development and using sustainably sourced materials. Therefore, a significant positive effect is expected in relation to SA objective 14: **climate change**.
- 4.273 As part of its approach to limiting the District's contribution to climate change, the policy also requires that development should provide cycle parking and electric vehicle charging points. While the use of electric vehicles can still have implications in terms of air quality relating to particulate matter from tyre and road-surface wear, these measures could help to reduce greenhouse gas emissions and other air pollutants from vehicles. As such, a minor positive effect is expected in relation to SA objective 10: **air quality**. Supporting an increase in travel by bicycle by providing cycle storage could also have positive effects in terms of health and well-being and therefore a minor positive effect is expected in relation to SA objective 2: **health**.
- 4.274 The policy is supportive of development that conserves water resources through the incorporation of water efficiency and water re-use measures and seeks to improve flood resilience. Minor positive effects are therefore likely in relation to SA objective 12: **flooding**.
- 4.275 Policy ES1 seeks to ensure that new development will minimise the generation of waste, and that the recycling of waste that is generated during the construction and operation of development is maximised. Therefore, a minor positive effect is expected in relation for SA objective 15: **waste**.
- 4.276 The policy sets out requirements relating to sustainable design and construction which may affect the viability of some potential schemes in Stroud; however the policy specifies that the emissions standards which should be met are to be adhered to unless it can be clearly demonstrated that the development would be made unviable. The policy is therefore not expected to have

implications in terms of the rate of housing delivery and economic investment and negligible effects are therefore expected in relation to SA objective 1: **housing** and SA objective 17: **economic growth**.

### **Policy ES2: Renewable or low carbon energy generation**

- 4.277 Policy ES2 seeks to contribute to the Council's Carbon Neutral 2030 commitments by supporting development that helps to cut greenhouse gas emissions and decarbonise the energy system. It identifies areas within which certain types of renewable energy developments are more likely to be supported by the Council. Therefore, a significant positive effect is expected in relation to SA objective 14: **climate change**.
- 4.278 The policy requires that renewable and low carbon energy developments are considerate of impacts and cumulative issues, relating to landscape character (with particular consideration for the Cotswolds AONB) and visual amenity, historical features, water quality, flood risk, and the amenity of the local area including air quality and noise. These types of development should also be able to demonstrate benefits to the area and local community. Therefore, minor positive effects are expected in relation to SA objectives 5: **vibrant communities**, 8: **landscapes/townscapes**, 9: **historic environment**, 10: **air quality**, 11: **water quality**, and 12: **flooding**.
- 4.279 Policy ES2 also requires that proposals should be considerate of impacts relating to biodiversity, as well as recreation and agricultural land use in Stroud. In addition to preserving important ecological networks in the District, these elements of the policy should also help to maintain areas which are of importance for local people in terms of allowing for opportunities for physical activities and protecting future food growing opportunities. Minor positive effects are therefore likely in relation to SA objectives 2: **health**, 7: **biodiversity/geodiversity** and 13: **efficient land use**.
- 4.280 The Policies Map also identifies potential for very large wind development at several locations adjacent to the internationally designated (SAC, SPA and Ramsar site) Severn Estuary, including to the south west of Berkeley and north east of Sharpness. There is potential for negative impacts on wildlife in the area and the wider District, both during the construction stage and once wind development is fully operational. The supporting text for the policy clarifies the policy approach taken in Policy ES2 to identify all land with technical potential according to the District's Council's Renewable Energy Resources Assessment (RERA) (2019) as suitable for wind development. All proposals on this land are required to satisfy a variety of criteria that will help to ensure that impacts upon the environment and amenity of the district, with specific reference to biodiversity, can be adequately controlled. While the policy makes no explicit reference to considering impacts on the Severn Estuary, the HRA has not identified any potential for this policy to have adverse impacts on any European sites. As such, the uncertain negative effect expected in combination with the minor positive effect in relation to SA objective 7: biodiversity/geodiversity is likely to be minor. The effect is uncertain as the exact location and scale of potential renewable energy developments is unknown at this stage.
- 4.281 Development for ground-mounted solar energy and wind energy are more likely to be supported within areas identified as suitable on the Policies Map. The Policies Map identifies that much of the District is considered suitable for solar or wind development and this includes some land in areas which may be more sensitive to development. In particular, the Policies Map identifies land to the south and west of Nailsworth and to the south west of Wotton-under-edge as suitable locations for 'very large (up to 175m)' wind development. These areas are both located within the Cotswolds AONB meaning that there is potential for adverse impacts relating to the character of this designated landscape. However, the policy also states that developments of this type, as well as ground-mounted solar energy developments, are more likely to be supported if they lie within Landscape Character Areas with lower sensitivity to the relevant development scale. As such it is expected that the policy would help to limit adverse impacts relating to landscape in the District. The support the policy provides for a level of development within the AONB means that some uncertainty is attached to the minor positive effect identified in relation to SA objective 8: **landscapes/townscapes**.
- 4.282 The identification of areas within which ground-mounted solar energy and wind energy proposals will be supported, may encourage investment in the renewable energy sector in the District. This

may allow for some economic growth as well as local job creation to occur in the area. As such a minor positive effect is also expected in relation to SA objectives 16: **employment** and 17: **economic growth** for Policy ES2.

### Policy DES3 Heat supply

- 4.283 Policy DES3 requires that where viable, development proposals should include a communal low-temperature heating system. The policy supports the inclusion of communal heating systems in line with a hierarchy which supports connections to local existing or planned heat networks firstly, followed by use of zero-carbon renewable heat or combined heat and power (CHP) and then use of local ambient or secondary heat sources.
- 4.284 It is expected that the policy would directly help provide some residents with the ability to connect to more efficient heating networks in Stroud. The policy is likely to help cut heating bills for residents, thereby limiting the potential for fuel poverty. It is also likely to have direct benefits in terms of reducing carbon emissions from heating. As such a minor positive effect is expected in relation to SA objective 3: **social inclusion** and a significant positive effect is expected in relation to SA objective 14: **climate change**.

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

- 4.285 Policy ES3 seeks to ensure that environmental risks are addressed within new development proposals, particularly in relation to adverse impacts to air, land and water quality. The policy is therefore expected to have significant positive effects in relation to SA objectives 10: **air quality** and 11: **water quality**. Furthermore, the policy also requires that proposals will not cause an increased risk of flooding at or around sites and therefore a minor positive effect is expected in relation to SA objective 12: **flooding**. The requirements of the policy for proposals to be refused if they would have an adverse impact on or from contaminated land means that a minor positive effect is expected in relation to SA objective 13: **efficient land use**. This effect recorded reflects the potential for the remediation of contaminated sites to result.
- 4.286 Minor positive effects are also expected for the policy in relation to SA objectives 2: **health** and 5: **vibrant communities**. The policy's support for measures to reduce environmental pollution (smell, light, fumes, water and land contamination) are likely to contribute to reducing adverse impacts on resident's health as well as quality of life in the District. These measures should also help improve resident's satisfaction with their surroundings. The policy specifically requires that development should not result in loss of daylight or sunlight, loss of privacy or an overbearing effect. As such a minor positive effect is also expected in relation to SA objective 1: **housing**. As the policy requires that proposals do not increase the potential for anti-social behaviour or environmental crime, a minor positive effect is also expected for the policy in relation to SA objective 4: **crime**.
- 4.287 Policy ES3 also seeks to ensure that development does not result in an unacceptable level of loss of healthy soils, and in particular to the best and most versatile agricultural land as well as the economic and other benefits this resource offers. Therefore, in addition the benefits already recorded in relation to SA objective 13: **efficient use of land**, a minor positive effect is also expected in relation to SA objective 17: **economic growth**.

### Policy ES4: Water resources, quality and flood risk

- 4.288 Policy ES4 seeks to ensure that new development is appropriately flood resilient and resistant through the implementation of appropriate mitigation measures and construction methods to reduce the risk of future flooding. The policy states that development should include contributions towards the maintenance of existing flood defences, as well as the delivery of new or maintenance of existing flood warning services. New developments should also incorporate Sustainable Drainage Systems (SuDS) in accordance with National Standards which aim to mimic more natural drainage processes and remove pollutants from surface run off. As the policy directly seeks to minimise the risk of flooding and potential for water bodies to be polluted, significant positive effects are expected in relation to SA objective 11: **water quality** and SA objective 12: **flooding**. A minor positive effect is also expected in relation to SA objective 14: **climate change** considering that addressing these issues will help the District to adapt to changes in climate.

- 4.289 By supporting the incorporation of multifunctional sustainable drainage measures at new developments, the policy could also provide a range of associated benefits. SuDS schemes may comprise techniques such as green roofs or the protection of wetlands or ponds. The policy also seeks to ensure that developments will open culverted watercourses where safe and practicable, to create valuable ecological assets, and consider measures to bring waterbodies to good ecological status. Therefore, minor positive effects are expected in relation to SA objective 7: **biodiversity/geodiversity** and SA objective 8: **landscapes/townscapes**.
- 4.290 The policy aims to ensure that new development maintains a good level of water efficiency by applying water conservation techniques such as grey water recycling. A minor positive effect is therefore expected in relation to SA objective 15: **waste**.

#### **Policy ES5: Air quality**

- 4.291 Policy ES5 seeks to ensure that new development demonstrates appropriate mitigation measures to reduce its impact on local air quality. This policy aims to maintain the predominantly good quality of air in Stroud District, and therefore a significant positive effect is expected in relation to SA objective 10: **air quality**. By mitigating the impacts of new development on air quality, residents are likely to experience benefits in terms of health and wellbeing. The policy specifically requires that development within areas of poorer air quality should incorporate measures to mitigate emission levels in order to protect public health and well-being. A minor positive effect is therefore expected in relation to SA objective 2: **health**.
- 4.292 The policy also requires developments to implement appropriate traffic management and highway improvements to mitigate emission levels. Improvements of this nature have the potential to indirectly improve public access to services and facilities and employment opportunities, as a result of reduced congestion. Therefore, minor positive effects are expected in relation to SA objectives 6: **services and facilities** and 16: **employment**.
- 4.293 Appropriate mitigation measures including landscaping or tree planting in order to separate the development and increase the distance from highways and junctions have the potential to enhance the local landscape, as well as create green corridors and habitat for wildlife. Therefore, minor positive effects are expected in relation to SA objectives 7: **biodiversity/geodiversity** and 8: **landscapes/townscapes**. The supporting text of the policy furthermore highlights that development which could potentially impact upon Natura 2000 sites through contributions to aerial deposition will require an assessment of the likely impacts. This approach is likely to help limit the potential for adverse impacts on many of the most important biodiversity designations in the plan area and the area surrounding.
- 4.294 The policy supports development which allows for the provision of the management and expansion of the capacity natural environment to mitigate poor air quality. Improvements of this type are likely to benefit the District's potential to adapt and mitigate climate change by providing carbon sinks. Therefore, a minor positive effect is expected in relation to SA objective 14: **climate change**.

#### **Policy DES1: Conversion of redundant agricultural, forestry and rural buildings**

- 4.295 Policy DES1 addresses the conversion of disused agricultural, forestry and rural buildings located outside of settlements in Stroud District. A minor positive effect is expected for the policy in relation to SA objective 1: **housing** as the policy sets out an appropriate hierarchy to prioritise use following conversion which is supportive of housing for essential agricultural or forestry workers firstly, followed by affordable housing and open market housing which sit lower in the hierarchy. This is likely to contribute to meeting specific housing needs in rural parts of the District.
- 4.296 In addition, minor positive effects are expected in relation to SA objectives 16: **employment** and 17: **economic growth** because the use hierarchy is likely to provide workers with good access to employment opportunities and support the rural economy. It also provides some scope for farm/forestry diversification for employment use.
- 4.297 Considering that the policy requires that conversions of this type should be at a location which is well related to existing infrastructure, amenities and services, the potential for an increased numbers of private car journeys when converted properties are occupied is likely to be limited.

Minor positive effects are therefore expected in relation to SA objectives 6: **services and facilities**, 10: **air quality** and 14: **climate change**.

- 4.298 The supporting text of the policy highlights that rural buildings may provide habitats and shelter for protected species such as owls and bats. Proposals for the conversion of rural buildings are to be supported by an assessment by a qualified ecological surveyor and options explored to both conserve and secure appropriate biodiversity net gain. Therefore, a minor positive effect is expected in relation to SA objective 7: **biodiversity/geodiversity**.
- 4.299 The policy also requires that proposals will not result in adverse impacts on the character of the existing building and its setting including that relating to agricultural or forestry character. As such, minor positive effects are expected for the policy in relation to SA objectives 8: **landscapes/townscapes** and 9: **historic environment**. While the conversion of buildings at rural locations has increased potential to result in adverse impacts in terms of setting and character, the policy addresses these types of adverse impacts.
- 4.300 As the policy permits the conversion of existing buildings in certain circumstances, it may help to reduce the need to develop greenfield land in Stroud District. A minor positive effect is therefore also expected in relation to SA objective 13: **efficient land use**.
- 4.301 The likely sustainability effects of Delivery Policies ES6 to ES12, DES2 and ES16 are described below.

**Table 4.13 SA findings for the second group of Delivery Policies relating to Our environment and Surroundings**

SA Objective	ES6 – Providing for biodiversity and geodiversity	ES7 – Landscape character	ES8 – Trees, hedgerows and woodlands	ES9 – Equestrian development	ES10 – Valuing our historic environment and assets	ES11 – Maintaining, restoring and regenerating the District’s canals	ES12 – Better design of places	DES2 – Green infrastructure	ES16 – Public art contributions
SA 1: Housing	0	0	0	0	0	0	0	0	0
SA 2: Health	+	0	+	+	0	+	+	+	0
SA 3: Social inclusion	0	0	0	0	0	0	++	+	0
SA 4: Crime	0	0	0	0	0	0	+	0	0
SA 5: Vibrant communities	+	0	0	0	0	+	++	+	++
SA 6: Services and facilities	0	0	0	0	0	0	+	0	0
SA 7: Biodiversity/geodiversity	++	+	++	+?	0	+	0	++	0
SA 8: Landscapes/townscapes	+?	++	++	+?	++	++	+	++	+
SA 9: Historic environment	0	+	0	+?	++	++	+	?	0
SA 10: Air quality	+	0	+	0	0	+	+	+	0
SA 11: Water quality	+	0	+	0	0	+	0	+	0
SA 12: Flooding	+	0	+	0	0	+	0	+	0
SA 13: Efficient land use	0	0	0	0	0	0	0	0	0
SA 14: Climate change	+	0	+	0	0	+	++	+	0
SA 15: Waste	0	0	0	0	0	0	0	0	0
SA 16: Employment	0	0	0	+	0	0	+	0	0
SA 17: Economic growth	0	+	0	+	0	0	+	0	+

**Policy ES6: Providing for biodiversity and geodiversity**

4.302 Policy ES6 sets out the requirement for all new development to provide a minimum of 10% net gain in biodiversity. The policy supports new development that maximises opportunities to enhance and create links between ecological networks and encourages the incorporation of enhancement within the design of development. In addition to the Mitigation Strategies being operated on the Rodborough Common SAC and the Severn Estuary SAC, SPA and Ramsar, development proposals that could affect the Cotswold Beechwoods SAC will be required to contribute to mitigation measures. The initiatives will be funded principally through S106 contributions that contribute towards an agreed SAC Avoidance and Mitigation Strategy. For

developments that are supported by specific measures to avoid and mitigate impacts upon the SAC or SPA, the District Council will undertake an Appropriate Assessment. A significant positive effect is therefore expected in relation to SA objective 7: **biodiversity/geodiversity**.

- 4.303 Enhancements relating to the natural environment, which Policy ES6 requires, is likely to have a range of associated benefits in terms for people in nearby communities. Opportunities for landscaping, retention of open space, and SuDS provision are also likely to result. As such the policy has the potential to result in benefits relating to the protection of local character, increased flood resilience, and improved water quality. The maintenance of undeveloped open space may also provide space of increased uptake of recreation and cultural activities among residents and the sequestration of air pollutants and carbon. As such minor positive effects are identified in relation to SA objectives 2: **health**, 5: **vibrant communities**, 8: **landscapes/townscapes**, 10: **air quality**, 11: **water quality**, 12: **flooding** and 14: **climate change**.

#### **Policy ES7: Landscape character**

- 4.304 Policy ES2 requires development proposals to protect, conserve, or enhance the special features and diversity of the different landscape character types found within Stroud District. To ensure that the local distinctiveness of landscapes in the plan area are appropriately considered in development proposals, the findings of relevant assessments, including the Stroud District Landscape Character Assessment, Cotswold AONB Landscape Character Assessment, Stroud Landscape Sensitivity Assessment and Cotswolds AONB Landscape Strategy and Guidelines should be drawn upon. The policy ensures that development is only permitted if all aspects are sympathetic and complement the landscape character, and if natural features including trees, hedgerows and water features which contribute to the landscape character are retained and appropriately managed. Therefore, a significant positive effect is expected in relation to SA objective 8: **landscapes/townscapes**.
- 4.305 The policy also ensures that priority is given to the conservation and enhancement of the natural and scenic beauty of the landscape within the Cotswolds AONB, or land that might affect its setting. In addition to having consideration for the natural heritage of the area, development should also be considerate of the historic and cultural heritage of the landscape of the AONB. Therefore, minor positive effects are likely in relation to SA objectives 7: **biodiversity/geodiversity**, and 9: **historic environment**.
- 4.306 The policy states that major development is not to be permitted within the AONB unless it is demonstrated to be in the national interest and that there is a lack of alternative sustainable development sites. This element of the policy could affect housing delivery in this part of the District. The overall effect recorded in relation to SA objective 1: **housing** is negligible, however, considering that the sites required to meet the housing need and level of job provision needed to support this level of growth are likely to be identified at other areas of the District. A minor positive effect is recorded in relation to SA objective 17: **economic growth**. This reflects the role that protecting the special character of the AONB will play in terms of supporting tourism in the District.

#### **Policy ES8: Trees, hedgerows and woodlands**

- 4.307 Policy ES8 seeks to enhance and expand Stroud District's hedgerow, tree, and woodland resource. The policy would not permit development that would result in the unacceptable loss of or damage to these resources, and where a loss of this type is considered acceptable adequate replacement should be made. The Council is to use the Gloucestershire Local Nature Partnership (LNP) Tree Strategy to guide woodland conservation and creation. In all, the policy seeks to ensure that there is no net loss of hedgerows given that they form a key component of ecological networks and ecosystem services. A significant positive effect is therefore expected in relation to SA objective 7: **biodiversity/geodiversity**.
- 4.308 The policy also requires development to ensure that soft landscaping which considers local landscape character is incorporated. This is to include the planting of indigenous hedge and tree species. Therefore, a significant positive effect is expected in relation to SA objective 8: **landscapes/townscapes**.
- 4.309 By supporting the expansion of Stroud District's woodland and tree resource, Policy ES8 will provide a number of environmental and social benefits. The provision of trees, hedgerows and



woodlands is likely to bring benefits to health and wellbeing in the District by providing space for recreation and appropriate interactions with nature. The enhancement and expansion of tree, hedgerow and woodland resources will also contribute to carbon sequestration and climate change mitigation and adaptation and can also increase the adsorption of air borne pollutants from vehicle emissions and other sources. These features can help to prevent the leaching of pollutants into surface and ground waters. Woodland and tree canopies can also act to intercept rainfall and increase soil stability and water retention. Minor positive effects are therefore expected in relation to SA objectives 2: **health**, 10: **air quality**, 11: **water quality**, and 12: **flooding** and 14: **climate change**.

#### **Policy ES9: Equestrian development**

- 4.310 Policy ES9 is supportive of development for the purposes of keeping horses for recreational or commercial purposes where it would not result in adverse effects in terms of the environmental quality of the rural area. This type of development will benefit the community by providing opportunities for active recreation. A minor positive effect is therefore expected in relation to SA objective 2: **health**. Equestrian business is increasingly popular in the District and provides opportunities for small-scale employment and investment in the local economy. As the policy is broadly supportive of this type of development, minor positive effects are also expected in relation to SA objective 16: **employment** and SA objective 17: **economic growth**.
- 4.311 The policy would help to address the provision of development which could otherwise have some impacts in terms of ecological diversity as a result in increased grazing, as well as landscape setting as field patterns are disrupted and character of existing buildings and settlements caused by change of use. As the policy would seek to prevent adverse impacts in relation to these issues uncertain positive effects are expected in relation to SA objective 7: **biodiversity/geodiversity**, SA objective 8: **landscape/townscape** and SA objective 9: **historic environment**.

#### **Policy ES10: Valuing our historic environment and assets**

- 4.312 Policy ES10 seeks to preserve, protect and enhance the District's historic environment. The policy sets out that proposals which conserve and enhance the significance and setting of the District's heritage assets and its townscapes will be supported. This includes reference to key views and vistas, as well as designated and undesignated heritage assets and archaeology.
- 4.313 Proposals involving a historic asset are to require a description of the heritage asset's significance and should be make use of appropriate expertise. Harm or loss of heritage assets as a result of a development proposal is to require clear and convincing justification. Furthermore, where there is evidence of deliberate neglect of, or damage to, a heritage asset this should not be used to justify its loss or alteration through development. Significant positive effects are expected for this policy in relation to SA objectives 8: **landscapes/townscapes** and 9: **historic environment**.

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

- 4.314 Policy ES11 supports the restoration and enhancement of Stroud District's canals. This includes improvement of access to and along the canals to encourage transport and recreational uses. Development adjacent to any canal and should be respectful of the canal's character and setting, as well as having regard to improving views along and from the canal. The Cotswold Canals fall within the Industrial Heritage Conservation Area and therefore the policy should directly help to preserve the setting of this designated heritage asset. As such significant positive effects are expected in relation to SA objectives 8: **landscapes/townscapes** and 9: **historic environment**.
- 4.315 The policy also aims to restore and enhance the District's canals in order to provide opportunities for leisure and recreational activities. These types of improvements are likely to enhance the identity of the District's communities and settlements by providing a sense of place and are also likely to improve the satisfaction of residents with the area. Therefore, minor positive effects are expected in relation to SA objectives 2: **health** and 5: **vibrant communities**.
- 4.316 Supporting the enhancement of the towpaths along the canals is likely to provide routes for walking and cycling. Modal shift may help to support improvements in local air quality and limit the District's contribution to climate change. Minor positive effects are therefore also expected in relation to SA objectives 10: **air quality** and 14: **climate change**.

4.317 The policy seeks to ensure that improvements to any canal includes enhancement of its biodiversity value. A minor positive effect is therefore expected in relation to SA objective 7: **biodiversity**. It is likely that improvements to the canals would help to support flood resilience and mitigate adverse impacts relating to water pollution. Minor positive effects are therefore also expected in relation to SA objectives 11: **water quality** and 12: **flooding**.

#### **Policy ES12: Better design of places**

4.318 Policy ES12 requires development to be well-designed and laid out to create high quality and successful places. Significant positive effects are expected in relation to SA objectives 3: **social inclusion** and 5: **vibrant communities** due the requirements of the policy for development to achieve socially integrated places, with well-planned routes, space for commercial and community activity and well-designed buildings and landscaped spaces. As well as having the potential to reduce social isolation in the District, the policy is likely to help create neighbourhoods where a high number of residents are satisfied with their surroundings.

4.319 The inclusion of safe pedestrian/cycle routes may result in developments where there is increased uptake of active travel amongst residents and therefore a minor positive effect is expected for the policy in relation to SA objective 2: **health**. There may also be positive effects in relation to limiting adverse impacts in terms of air quality and carbon emissions due to potentially a reduced proportion of people being reliant on private car trips. In addition, well designed layouts of developments where there is a mix of uses, may contribute to the accessibility of services and facilities and an overall reduced need to travel. As such, positive effects are expected for the policy in relation to SA objectives 6: **services and facilities**, 10: **air quality** and 14: **climate change**. Given that the policy specifically requires new development to contribute to carbon neutrality, the positive effect expected in relation to SA objective 14 is significant. The positive effects expected in relation to SA objectives 6 and 10 are minor.

4.320 The policy's promotion of mixed-use developments may encourage the provision of employment opportunities in close proximity to residential properties and therefore a minor positive effect is expected in relation to SA objective 16: **employment**. As commercial building stock is to be maintained in the District as new development is provided, it is likely that this policy will help encourage local investment. A minor positive effect is therefore expected for the policy in relation to SA objective 17: **economic growth**.

4.321 The policy places an emphasis on the requirement for Design and Access Statements to demonstrate sufficient consideration of local context. This is likely to help ensure positively designed buildings and landscaped spaces that will not cause adverse impacts on the existing character of the District. As such, minor positive effects are expected for the policy in relation to SA objectives 8: **landscapes/townscapes** and 9: **historic environment**. The policy also promotes the creation of safe, attractive public spaces, which may help reduce the potential for incidences of crime. Therefore, a minor positive effect is also expected for the policy in relation to SA objective 4: **crime**.

#### **Policy DES2: Green infrastructure**

4.322 Policy DES2 seeks to protect and enhance existing green infrastructure provision in Stroud and to avoid harm to strategic green infrastructure assets as a result of new development. Green infrastructure benefits biodiversity in terms of habitat creation and connectivity and the policy requires that proposals improve the networks and corridors of green infrastructure to maximise their potential benefits to ecology. To ensure demonstrable benefits from this requirement, the policy states that replacement green infrastructure or mitigation should seek to deliver net gains in biodiversity. As such, a significant positive effect is expected for the policy in relation to SA objective 7: **biodiversity/geodiversity**. A significant positive effect is also identified for the policy in relation to SA objective 8: **landscapes/townscapes**. Preventing the loss of green infrastructure is likely to ensure that the District's environmental assets continue to contribute to the area's character and setting. The policy also requires that long term management arrangements are established for green infrastructure assets, which is likely to ensure they provide benefits in perpetuity.

4.323 Green infrastructure can also contribute to the setting of heritage assets. Impacts relating to the setting of these assets will be dependent upon the specific design of new green infrastructure and

therefore an uncertain but potentially positive effect is identified in relation to SA objective 9: **historic environment**.

- 4.324 Green infrastructure also yields potential benefits in relation to mitigating climate change. Positive effects may result in terms of carbon sequestration and providing space for walking and cycling which may reduce reliance upon private car trips. The policy promotes the improvement of green infrastructure to support these functions and therefore minor positive effects are expected in relation to SA objectives 14: **climate change** and 10: **air quality**. Green infrastructure can have further benefits in terms of allowing for the retention of surface water and reducing the potential for run off of pollutants into water bodies. Minor positive effects are therefore expected in relation to SA objectives 11: **water quality** and 12: **flooding**.
- 4.325 In addition to mitigating climate change, the policy also promotes the enhancement of green infrastructure areas and corridors to improve their functionality for recreational purposes. As such, the policy could increase the potential for uptake of physical activity amongst residents in the District to the benefit of local public health and a minor positive effect is expected for the policy in relation to SA objective 2: **health**. Minor positive effects are also expected for the policy in relation to SA objectives 3: **social inclusion** and 5: **vibrant communities** as the approach to enhancing existing and delivering new green infrastructure has the potential to result in improved social cohesion through an improved sense of place and better opportunities for residents to meet in attractive environments.

#### **Policy ES16: Public art contributions**

- 4.326 Policy ES16 addresses the funding of art and design works through new developments in Stroud District. It requires that major development proposals should provide proportionate contributions towards publicly accessible art and design works that help to create a sense of place for the development. A significant positive effect is therefore expected for the policy in relation to SA objective 5: **vibrant communities**.
- 4.327 These types of enhancements also have the potential to enhance the cultural offer of areas in the District and may even result in greater levels of tourism if projects are particularly successful. As such, a minor positive effect is also expected for the policy in relation to SA objective 17: **economic growth**. In addition, there may be opportunities for such projects to contribute positively to the existing townscapes of settlements. Therefore, a minor positive effect is expected for the policy in relation to SA objective 8: **landscapes/townscapes**.

## 5 Sustainability Appraisal findings for the Pre-submission Draft Local Plan Sites

- 5.1 This chapter sets out the SA findings for the sites included in Pre-submission Draft Local Plan. The Pre-submission Draft Local Plan includes 35 site allocations and two safeguarded sites that contribute to the Local Plan's growth strategy. The 35 site allocations in the Pre-submission Draft Local Plan include the new settlement at Sharpness (PS36) presented across two phases. Given that these sites are allocated through one policy and together will form a new settlement in their own right, they have been presented as one site in the SA. Where differing effects are expected for the two phases these have been highlighted in the appraisal text. The two safeguarded sites will potentially contribute to meeting Gloucester's housing needs (G2, Land at Whaddon) and Minchinhampton's future housing needs (PS05a, East of Tobacconist Road). From here on in this SA Report, for ease of reference, these sites are collectively referred to as site allocations.
- 5.2 The site allocations have been taken forward by the Council for inclusion in the Pre-submission Draft Local Plan for a variety of reasons. **Appendix 9** outlines the reasons for including the site allocations (as well as the reasons for discounting the alternative site options not included).
- 5.3 The summary of SA findings for all site options considered at each stage of plan preparation is presented in **Table A5.1 to Table A5.7** in **Appendix 5** of this report, followed by the detailed appraisal matrices. This includes all sites appraised as part of the SA work for the Local Plan Review Emerging Strategy Paper (November 2018), the Draft Local Plan (November 2019) and the Additional Housing Options consultation (October 2020). It should be noted that the appraisal of all the reasonable site options in **Appendix 5** was undertaken on a consistent basis using the SA assumptions set out in **Appendix 4**, and without taking any policy requirements into account (i.e. 'policy-off').
- 5.4 **Table 5.1** below lists all of the site allocations included in the Pre-submission Draft Local Plan and shows how each of these relates to draft site allocations in the Draft Plan consulted upon in November 2019 and those site options appraised as part of SA work previously undertaken for the Local Plan<sup>56</sup>. The site allocations are presented in the order they appear in the Pre-submission Draft Local Plan document. The table shows the use at each site and also where any updates have been made to the site boundaries. Four site allocations which were not previously included in the Draft Local Plan or Emerging Strategy Paper are highlighted in green. With the exception of site PS05a, these sites have come forward since that consultation as part of the Additional Housing Options consultation<sup>57</sup>. Site PS05a, previously formed part of site PS05 which was included at Minchinhampton in the Draft Local Plan.
- 5.5 The detailed appraisal matrices for the site allocations are presented in **Appendix 7**. The appendix presents the detailed findings for all sites included in both the Draft Plan and Pre-submission Draft Local Plan. The findings for the sites included in the Pre-submission Draft Local Plan are summarised below. This summary has taken the information provided for each site allocation within the Pre-submission Draft Local Plan into account (i.e. the quantum and type of development proposed and the site allocation policy text which includes specific mitigation measures and infrastructure requirements for each site).
- 5.6 The individual matrices for the site allocations in **Appendix 7** show three columns of SA effects for each site:
- the first column shows the findings of the site appraisal 'policy-off' (i.e. without reflecting any detailed policy requirements);
  - the second column shows the SA effects of the site boundary as presented in the Draft Plan,

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<sup>56</sup> SA of Additional Housing Options (2020), SA of Draft Local Plan (2019) and SA of Emerging Strategy (2018)

<sup>57</sup> Stroud District Council (2020) Stroud District Local Plan Review Additional Housing Options

taking into account the potential policy requirements set out in the Draft Plan; and

- the third column (where the site is included in Pre-submission Draft Local Plan) shows the SA effects of the site boundary as presented in the Pre-submission Draft Local Plan, taking into account the policy text for the site allocation in that document.

5.7 It should be noted that the Pre-submission Draft Local Plan allocates the northern portion of site PS05 for housing, with the southern portion of the site (PS05a) safeguarded to potentially meet the future housing needs of Minchinhampton. The matrix for site PS05 therefore has an additional column to show the longer term effects of safeguarding the land within the boundary of PS05a.

5.8 The Pre-submission Draft Local Plan presents each site allocation by parish cluster and by settlement and the SA effects for the site allocations are presented in the summary tables in this same order in this chapter. The detailed matrices in Appendix 7 also follow this order. The sites included in the Pre-submission Draft Local Plan fall into two categories:

- local development sites (mostly small residential-led sites with associated uses); and
- strategic development sites allocations (larger urban extension or new settlement sites which would make substantial contributions to the meeting the local housing need alongside other uses and employment sites).

5.9 **Tables 5.2, 5.3 and 5.4** later in this chapter present a summary of the likely sustainability effects of all sites included in the Pre-submission Draft Local Plan. The summary of the SA findings in these tables for the 37 sites included in the Pre-submission are split between the 23 local site allocations, three strategic employment site allocations and 10 strategic housing and mixed use site allocations. The SA assumptions (see **Appendix 4**) used to guide the appraisal of sites includes different criteria for employment sites compared to housing and mixed use sites. Therefore, the summary of employment sites has been presented separately from other sites included in the Pre-submission Draft Local Plan. As explained in the introduction to this chapter, the appraisal of the 10 housing and mixed use strategic development sites includes the appraisal of phase 1 and phase 2 of the Sharpness new settlement together as one site.

**Table 5.1 Relationship between site allocations appraised as part of the SA of Pre-submission Draft Local Plan (May 2021), draft site allocations appraised as part of SA of Draft Plan (November 2019) and site options appraised through the Emerging Strategy Paper (November 2018) and/or Additional Housing Options (October 2020) consultation**

*Note: Site allocations which were not previously included in the Draft Plan or Emerging Strategy Paper are highlighted in green (with the exception of site PS05a, these sites have come forward since that consultation as part of the Additional Housing Options consultation).*

May 2021 Pre-submission Local Draft Plan allocation ref, name, and proposed use	Allocation ref, name, and proposed use included in the Draft Plan (2019) and Emerging Strategy Paper (2018) or in the Additional Housing Options (2020) consultation	SALA site ref and name	What was the site appraised for as part of the appraisal of reasonable alternatives at the early stage of the SA?	Any boundary changes?
PS01 Brimscombe Mill - 40 dwellings - Employment uses - Associated community and open space uses	<i>Draft Plan:</i> PS01 Brimscombe Mill - 40 dwellings - Employment uses - Community uses - Open space uses <i>Emerging Strategy:</i> PS01 Brimscombe Mill - 40 dwellings - Employment uses	Includes: BRI008 Brimscombe Mills & Mill Pond and BRI022 Lakeside Depot	BRI008 and BRI022 previously appraised separately for residential use only	No - site is equivalent to merging of BRI008 and BRI022 in Emerging Strategy Paper, Draft Plan and Pre-submission Plan.

May 2021 Pre-submission Local Draft Plan allocation ref, name, and proposed use	Allocation ref, name, and proposed use included in the Draft Plan (2019) and Emerging Strategy Paper (2018) or in the Additional Housing Options (2020) consultation	SALA site ref and name	What was the site appraised for as part of the appraisal of reasonable alternatives at the early stage of the SA?	Any boundary changes?
PS02 Brimscombe Port <ul style="list-style-type: none"> <li>- 150 dwellings,</li> <li>- Canal related tourism development and</li> <li>- Employment uses</li> <li>- Associated community and open space uses</li> </ul>	<i>Draft Plan:</i> PS02 Brimscombe Port <ul style="list-style-type: none"> <li>- 150 dwellings</li> <li>- Canal related tourism</li> <li>- Employment uses</li> <li>- Community uses</li> <li>- Open space uses</li> </ul> <i>Emerging Strategy:</i> PS02 Brimscombe Port <ul style="list-style-type: none"> <li>- 150 dwellings</li> <li>- Canal related tourism</li> <li>- Employment uses</li> </ul>	BRI009 Brimscombe Port Industrial Estate	BRI009 appraised for mixed use	No - site equivalent to BRI009 in Emerging Strategy Paper, Draft Plan and Pre-submission Plan.
PS05 East of Tobacconist Road <ul style="list-style-type: none"> <li>- 80 dwellings</li> <li>- Associated community and open space uses</li> <li>- Strategic landscaping</li> </ul>	<i>Draft Plan:</i> PS05 East of Tobacconist Road <ul style="list-style-type: none"> <li>- 80 dwellings</li> <li>- Community building</li> <li>- Open space uses</li> <li>- Strategic landscaping</li> </ul> <i>Emerging Strategy:</i> PS05 East of Tobacconist Road <ul style="list-style-type: none"> <li>- 100 dwellings</li> <li>- Doctors surgery</li> <li>- Community and open space uses</li> </ul>	MIN005 Land at Glebe Farm	MIN005 appraised for residential use only	Yes - site equivalent to MIN005 in both Emerging Strategy Paper and Draft Plan. However, at Pre-submission stage the site boundary has been reduced to only include the northern part of the Draft Plan site. The southern part of the site to be safeguarded for the next Local Plan (see site PS05a).
PS05a East of Tobacconist Road <ul style="list-style-type: none"> <li>- Land safeguarded with potential to meet the future housing needs of Minchinhampton, if required. The principle of development will be considered at the next Local Plan review.</li> </ul>	Part of PS05	Part of MIN005 Land at Glebe Farm	MIN005 appraised for residential use only	Yes – site formed part of MIN005 (see cell above for further information).
PS06 The New Lawn <ul style="list-style-type: none"> <li>- 90 dwellings</li> <li>- Associated community and open space uses</li> </ul>	<i>Draft Plan:</i> PS06 The New Lawn <ul style="list-style-type: none"> <li>- 80 dwellings</li> <li>- Community and open space uses</li> </ul> <i>Emerging Strategy:</i> PS06 The New Lawn, Nailsworth <ul style="list-style-type: none"> <li>- 80 dwellings</li> <li>- Community uses (subject to relocation of football ground)</li> </ul>	NAI008 The New Lawn	NAI008 appraised for residential use only	No - site equivalent to NAI008 in Emerging Strategy Paper, Draft Plan and Pre-submission Plan.

May 2021 Pre-submission Local Draft Plan allocation ref, name, and proposed use	Allocation ref, name, and proposed use included in the Draft Plan (2019) and Emerging Strategy Paper (2018) or in the Additional Housing Options (2020) consultation	SALA site ref and name	What was the site appraised for as part of the appraisal of reasonable alternatives at the early stage of the SA?	Any boundary changes?
PS10 Railway land / car parks, Cheapside - 75 dwellings - Town centre uses. - Improved rail/bus interchange - Retention and improvement of community uses	<i>Draft Plan:</i> PS10 Railway land/car parks, Cheapside - 75 dwellings - Town centre uses <i>Emerging Strategy:</i> PS10 Railway Land/car parks, Cheapside - 75 dwellings - Open space uses	STR014 Railway Land/car parks	STR014 appraised for mixed use	No - site equivalent to STR014 in Emerging Strategy Paper, Draft Plan and Pre-submission Plan.
PS11 Merrywalks Arches - 25 dwellings - Town centre uses	<i>Draft Plan:</i> PS11 Merrywalks Arches, Merrywalks - 25 dwellings - Town centre uses <i>Emerging Strategy:</i> PS11 Merrywalks Arches, Merrywalks - 25 dwellings - Town centre uses	STR015 Merrywalks Arches (former Cotswold Indoor Bowls)	STR015 appraised for mixed use	No - site equivalent to STR015 in Emerging Strategy Paper, Draft Plan and Pre-submission Plan.
PS12 Police Station / Magistrate's Court, Parliament Street, - 45 dwellings - Town centre uses	<i>Draft Plan:</i> PS12 Police station/magistrate court, Parliament St - 45 dwellings - Town centre uses <i>Emerging Strategy:</i> PS12 Police station/Magistrates Court, Parliament St - 45 dwellings - Town centre uses	STR018 Police station/Magistrates Court	STR018 appraised for residential use only	No - site equivalent to STR018 in Emerging Strategy Paper, Draft Plan and Pre-submission Plan.
STR065 Land at Beeches Green - 20 dwellings - Healthcare and extra care accommodation	<i>Additional Housing Options:</i> STR065 Land at Beeches Green - 20 dwellings - Healthcare and extra care accommodation	STR065	No - first identified as part of the Additional Housing Options consultation in October 2020	No - site equivalent to STR065 in the Additional Housing Options consultation.
PS16 South of Leonard Stanley Primary School - 25 dwellings - Associated open space uses	<i>Draft Plan:</i> PS16 South of Leonard Stanley primary School - 25 dwellings - Community and open space uses <i>Emerging Strategy:</i> PS16 South of Leonard Stanley Primary School - 30 dwellings - Open space uses	LEO007 Land at Leonard Stanley	LEO007 appraised for residential use only	No - site equivalent to LEO007 in Emerging Strategy Paper, Draft Plan and Pre-submission Plan.
PS42 Land off Dozule Close - 15 dwellings	<i>Draft Plan:</i> PS42 Land off Dozule Close, Leonard Stanley	LEO009 Land off Dozule Close	LEO009 appraised for residential use only (as per SALA 2019)	No - equivalent to site LEO009 promoted

May 2021 Pre-submission Local Draft Plan allocation ref, name, and proposed use	Allocation ref, name, and proposed use included in the Draft Plan (2019) and Emerging Strategy Paper (2018) or in the Additional Housing Options (2020) consultation	SALA site ref and name	What was the site appraised for as part of the appraisal of reasonable alternatives at the early stage of the SA?	Any boundary changes?
<ul style="list-style-type: none"> <li>- Associated open space uses</li> </ul>	<ul style="list-style-type: none"> <li>- 15 dwellings</li> <li>- Community and open space uses (open space on the southwest of the site and adjoining Marsh Lane to be retained)</li> </ul> <p><i>Emerging Strategy:</i></p> <ul style="list-style-type: none"> <li>- Not included</li> </ul>			through the 2019 SALA.
<p>PS17 Magpies site, Oldends Lane</p> <ul style="list-style-type: none"> <li>- 10 dwellings</li> <li>- New community building with car parking and landscaping</li> <li>- Site also safeguards land to allow for a future pedestrian bridge</li> </ul>	<p><i>Draft Plan:</i></p> <p>PS17 Magpies site, Oldends Lane</p> <ul style="list-style-type: none"> <li>- 10 dwellings</li> <li>- Community and open space uses</li> </ul> <p><i>Emerging Strategy:</i></p> <p>PS17 Magpies site, Oldends Lane</p> <ul style="list-style-type: none"> <li>- 10 dwellings</li> <li>- Community and open space uses</li> </ul>	STO002 Magpies site, Oldends Lane	STO002 appraised for residential use only	Yes – boundary of site STO002 which was included in the Emerging Strategy Paper and Draft Plan extended to the north in the Pre-submission Plan to include community provision.
<p>PS19a Stonehouse North West</p> <ul style="list-style-type: none"> <li>- 700 dwellings</li> <li>- 8 plots for traveling showpeople uses</li> <li>- 5 ha of office, B2 and B8 employment land and ancillary uses</li> <li>- Primary school and contributions towards secondary school</li> <li>- Contribution towards a new surgery</li> <li>- Natural green space and public outdoor playing space</li> <li>- Contributions to off-site indoor sports and leisure facilities</li> <li>- Landscaping buffer</li> <li>- Contributions towards the re-opening of Stonehouse Bristol Road rail station</li> </ul>	<p><i>Draft Plan:</i></p> <p>PS19a Northwest of Stonehouse</p> <ul style="list-style-type: none"> <li>- 650 dwellings</li> <li>- 5ha employment land</li> <li>- Primary school</li> <li>- Strategic landscaping</li> <li>- Green Infrastructure</li> <li>- Community and open space uses</li> </ul> <p><i>Emerging Strategy:</i></p> <p>PS19 North/northwest of Stonehouse</p> <p>(a)</p> <ul style="list-style-type: none"> <li>- 500 dwellings</li> <li>- Open space uses</li> <li>- 5ha employment land</li> </ul> <p>(b)</p> <ul style="list-style-type: none"> <li>- 150 dwellings</li> <li>- Open space uses</li> </ul>	Includes: STO016 Land north west of Stonehouse; and STO021 Stagholt Farm (STO015 now not included in site boundary)	STO015 appraised for residential STO016 appraised for mixed use STO021 appraised for residential use only (as per SALA 2019)	Yes - boundary of STO016 was adjusted for PS19 in the Emerging Strategy Paper. The boundary of PS19 in Draft Plan comprised PS19(a) in the Emerging Strategy Paper (which excludes STO015) plus STO021. The boundary in the Pre-submission Plan now excludes STO021 Stagholt Farm.



May 2021 Pre-submission Local Draft Plan allocation ref, name, and proposed use	Allocation ref, name, and proposed use included in the Draft Plan (2019) and Emerging Strategy Paper (2018) or in the Additional Housing Options (2020) consultation	SALA site ref and name	What was the site appraised for as part of the appraisal of reasonable alternatives at the early stage of the SA?	Any boundary changes?
<p>PS20 Stonehouse - Eco Park M5 Junction 13</p> <ul style="list-style-type: none"> <li>- Sports stadium and ancillary uses including fitness centre, hotel and sports training pitches</li> <li>- 10ha business uses associated with the green technology and low carbon sector</li> <li>- Care village</li> <li>- Canal cut, towpath and operational uses</li> <li>- Natural green space</li> <li>- Landscaping buffer</li> <li>- Multi-modal travel interchange hub</li> <li>- Contributions towards the re-opening of Stonehouse Bristol Road rail station</li> </ul>	<p><i>Draft Plan:</i> PS20 M5 Junction 13</p> <ul style="list-style-type: none"> <li>- 10ha employment land</li> <li>- Sports stadium</li> <li>- Sports pitches</li> <li>- Canal use</li> <li>- Open space uses</li> </ul> <p>Strategic landscaping</p> <p><i>Emerging Strategy:</i> PS20 M5 Junction 13</p> <p>(a)</p> <ul style="list-style-type: none"> <li>- 10ha employment land</li> <li>- Canal uses</li> <li>- Open space uses</li> </ul> <p>(b)</p> <ul style="list-style-type: none"> <li>- 18ha sports stadium</li> <li>- Community uses</li> </ul>	<p>Includes: EAS007 D1 Land at Junction 13 of the M5 (south); EAS007 D2 Land at Junction 13 of the M5 (north) and EAS019 Field north of Travelodge at Chipmans Platt</p>	<p>EAS007 previously appraised for employment, residential and for a football stadium</p> <p>EAS019 appraised for residential use only (as per SALA 2019)</p>	<p>Yes - site in Emerging Strategy Paper equivalent to EAS007, however, the boundary of PS20 in Draft Plan also includes EAS019. No further change to site boundary in Pre-submission Plan.</p>
<p>PS24 Cam North West</p> <ul style="list-style-type: none"> <li>- 900 dwellings</li> <li>- Primary school and contributions towards secondary school</li> <li>- Contribution towards the extension of existing health facilities</li> <li>- Natural green space and public outdoor playing space, including on-site community building or access improvements and contributions to Jubilee Fields and contributions to off-site indoor</li> </ul>	<p><i>Draft Plan:</i> PS24 West of Draycott</p> <ul style="list-style-type: none"> <li>- 700 dwellings</li> <li>- Primary school</li> <li>- Strategic landscaping</li> <li>- Green infrastructure</li> <li>- Community and open space uses</li> </ul> <p><i>Emerging Strategy:</i> PS24 West of Draycott</p> <ul style="list-style-type: none"> <li>- 700 dwellings</li> <li>- Open space uses</li> </ul>	<p>Includes: CAM013 Land west of Draycott Crescent; CAM025 Land NW Cam; and CAM026 Land west of A4135 Draycott)</p>	<p>CAM013, CAM025, CAM026 all appraised previously for residential only</p>	<p>Yes - site in Emerging Strategy Paper equivalent to CAM013, CAM025 and CAM026, however boundary of PS24 in Draft Plan was adjusted to include only part of these sites. No further change to site boundary in Pre-submission Plan.</p>

May 2021 Pre-submission Local Draft Plan allocation ref, name, and proposed use	Allocation ref, name, and proposed use included in the Draft Plan (2019) and Emerging Strategy Paper (2018) or in the Additional Housing Options (2020) consultation	SALA site ref and name	What was the site appraised for as part of the appraisal of reasonable alternatives at the early stage of the SA?	Any boundary changes?
<p>sports and leisure facilities</p> <ul style="list-style-type: none"> <li>- Landscaping buffer</li> </ul>				
<p>PS25 Cam North East extension</p> <ul style="list-style-type: none"> <li>- 180 dwellings</li> <li>- Natural green space public outdoor playing space</li> <li>- Strategic walking and cycling route connecting to Cam local centre and improving access to the south</li> <li>- Contributions towards off-site indoor sports and leisure facilities, education provision and the extension of existing health facilities</li> <li>- landscaping buffer</li> </ul>	<p><i>Draft Plan:</i> PS25 East of River Cam</p> <ul style="list-style-type: none"> <li>- 180 dwellings</li> <li>- Community and open space uses</li> </ul> <p><i>Emerging Strategy:</i> PS25 East of River Cam</p> <ul style="list-style-type: none"> <li>- 180 dwellings</li> <li>- Open space uses</li> </ul>	Includes: CAM E East of River Cam	CAM E appraised for residential use only	Yes - site boundary of CAM E was adjusted for PS25 in Emerging Strategy Paper. PS25 remains equivalent from Emerging Strategy Paper to Draft Plan. No further change to site boundary in Pre-submission Plan.
<p>PS27 1-25 Long Street</p> <ul style="list-style-type: none"> <li>- Town centre uses</li> </ul>	<p><i>Draft Plan:</i> PS27 1-25 Long Street</p> <ul style="list-style-type: none"> <li>- Town centre uses</li> </ul> <p><i>Emerging Strategy:</i> PS27 1-25 Long Street</p> <ul style="list-style-type: none"> <li>- Town centre uses</li> </ul>	DUR003 1-25 Long Street	DUR003 appraised for mixed use	Yes - site in Emerging Strategy Paper equivalent to DUR003, however, boundary of PS27 in Draft Plan has been adjusted to include only part of DUR003. No further change to site boundary in Pre-submission Plan.
<p>PS28 Land off Prospect Place</p> <ul style="list-style-type: none"> <li>- 10 dwellings</li> <li>- Open space uses</li> <li>- Town centre uses</li> </ul>	<p><i>Draft Plan:</i> PS28 Land off Prospect Place</p> <ul style="list-style-type: none"> <li>- 10 dwellings</li> <li>- Community and open space uses</li> <li>- Town centre uses</li> </ul> <p><i>Emerging Strategy:</i> PS28 The Old Dairy/ Land off Prospect Place</p> <ul style="list-style-type: none"> <li>- 10 dwellings</li> <li>- Town centre uses</li> </ul>	DUR017 The Old Dairy/ Land off Prospect Place	DUR017 appraised for residential use only	No - site equivalent to DUR017 in Emerging Strategy Paper, Draft Plan and Pre-submission Plan.
<p>HAR017 Land at Sellars Road</p> <ul style="list-style-type: none"> <li>- 10 dwellings</li> <li>- Open space</li> </ul>	<p><i>Additional Housing Options:</i> HAR017 Land at Sellars Road</p> <ul style="list-style-type: none"> <li>- 11 to 15 homes</li> </ul>	HAR017	No - first identified as part of the Additional Housing Options consultation in October 2020	No - site equivalent to HAR017 in the Additional Housing Options consultation.

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<p>PS30 Hunts Grove Extension</p> <ul style="list-style-type: none"> <li>- 750 dwellings</li> <li>- local centre, incorporating local retail and community uses</li> <li>- Primary school</li> <li>- Natural greenspace and publicly accessible outdoor playing-space</li> <li>- Landscaping buffer</li> <li>- Safeguarding of land for the provision of a potential future railway station and appropriate contributions towards the opening of the Hunts Grove railway station</li> </ul>	<p><i>Draft Plan:</i> PS30 Hunts Grove Extension</p> <ul style="list-style-type: none"> <li>- 750 dwellings</li> <li>- Primary school</li> <li>- Community and open space uses</li> <li>- Strategic landscaping</li> </ul> <p><i>Emerging Strategy:</i> PS30 Hunts Grove extension</p> <ul style="list-style-type: none"> <li>- 750 dwellings</li> <li>- Community and open space uses</li> </ul>	HAR004 SA4 Hunts Grove Extension	HAR004 appraised for residential use only	No - site equivalent to HAR004 in Emerging Strategy Paper, Draft Plan and Pre-submission Plan.
<p>PS32 Quedgeley East Extension</p> <ul style="list-style-type: none"> <li>- 5ha for office, B2 and B8 employment uses</li> <li>- Strategic landscape buffer</li> </ul>	<p><i>Draft Plan:</i> PS32 South of M5/J12</p> <ul style="list-style-type: none"> <li>- 5ha employment land</li> <li>- Strategic landscaping</li> </ul> <p><i>Emerging Strategy:</i> PS32 South of M5/J12</p> <ul style="list-style-type: none"> <li>- 5ha employment land</li> </ul>	HFD009 Quedgeley East Extension	HFD009 appraised for employment use	No - site equivalent to HFD009 in Emerging Strategy Paper, Draft Plan and Pre-submission Plan.
<p>PS43 Javelin Park</p> <ul style="list-style-type: none"> <li>- 27 ha for Office, B2 and B8 employment uses</li> <li>- Strategic landscape buffer</li> </ul>	<p><i>Draft Plan:</i> PS43 Javelin Park</p> <ul style="list-style-type: none"> <li>- 9ha employment land</li> </ul> <p>Strategic landscaping</p> <p><i>Emerging Strategy:</i></p> <ul style="list-style-type: none"> <li>- Not included</li> </ul>	Part of HFD012 Land west of Gloucester Road (B4008)	HFD012 appraised for employment use only (as per SALA 2019)	Yes – the site boundary of HFD012 adjusted for PS43 in the Draft Plan. HFD012 was promoted through the 2019 SALA. Site boundary extended further to the south in Pre-submission Plan.
<p>G1 South of Hardwicke</p> <ul style="list-style-type: none"> <li>- Approximately 1,350 dwellings</li> <li>- local centre, incorporating local retail and community uses</li> <li>- Primary school and contributions to provision of</li> </ul>	<p><i>Draft Plan:</i> G1 South of Hardwicke</p> <ul style="list-style-type: none"> <li>- Approximately 1,200 dwellings</li> <li>- Local centre</li> <li>- Community uses</li> <li>- Primary school</li> <li>- Green infrastructure</li> </ul>	Includes: HAR001 Land at Hardwicke and HAR002 Land at Church Lane, Hardwicke	HAR001 and HAR002 appraised for residential use only	No - equivalent to boundaries of HAR001 and HAR002 in Emerging Strategy Paper, Draft Plan and Pre-submission Plan

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<ul style="list-style-type: none"> <li>- secondary school and further education provision</li> <li>- Natural greenspace and public outdoor playing space</li> <li>- Site for a new surgery or contribution towards the extension of existing health facilities</li> <li>- Landscaping buffer</li> </ul>	<ul style="list-style-type: none"> <li>- Open space and strategic landscaping</li> </ul> <p><i>Emerging Strategy:</i></p> <p>G1 South of Hardwicke</p> <ul style="list-style-type: none"> <li>- Potential to meet Gloucester's unmet housing needs subject to being considered against all reasonable alternatives on the edge of Gloucester</li> </ul>			
<p>G2 Land at Whaddon</p> <ul style="list-style-type: none"> <li>- Approximately 3,000 dwellings</li> <li>- 8 plots for travelling showpeople</li> <li>- Primary school and contributions to provision of secondary school on 8.7ha site within development</li> <li>- Site for a new surgery or contribution towards the extension of existing health facilities</li> <li>- Local centre incorporating employment, local retail and community uses</li> <li>- Bus interchange</li> <li>- natural green and public outdoor playing space</li> <li>- On-site community building and contributions to off-site indoor sports and leisure facilities</li> </ul>	<p><i>Draft Plan:</i></p> <p>G2 Land at Whaddon</p> <ul style="list-style-type: none"> <li>- Approximately 2,500 dwellings</li> <li>- Local centres including shops, community and employment uses</li> <li>- Secondary and primary schools</li> <li>- Bus interchange and safeguarded rail halt</li> <li>- Green infrastructure</li> <li>- Open space and strategic landscaping</li> </ul> <p><i>Emerging Strategy:</i></p> <p>G2 Whaddon</p> <ul style="list-style-type: none"> <li>- Potential to meet Gloucester's unmet housing needs subject to being considered against all reasonable alternatives on the edge of Gloucester</li> </ul>	BRO002 Land at Whaddon	BRO002 appraised for mixed use	No - equivalent to boundaries of BRO002 in Emerging Strategy Paper, Draft Plan and Pre-submission Plan.
<p>PS33 Northwest of Berkeley</p> <ul style="list-style-type: none"> <li>- 110 dwellings</li> </ul>	<p><i>Draft Plan:</i></p> <p>PS33 Northwest of Berkeley</p> <ul style="list-style-type: none"> <li>- 120 dwellings</li> </ul>	BER006 Land north of Berkeley and south west of bypass	BER006 appraised for residential use only	No - equivalent to site BER006 in Emerging Strategy Paper, Draft

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- Associated open space uses and strategic landscaping	- Community and open space use - Strategic landscaping <i>Emerging Strategy:</i> PS33 Northwest of Berkeley - 120 dwellings - Community and open space uses - Strategic landscaping			Plan and Pre-submission Plan.
BER016/17 Land at Lynch Road, Berkeley - 60 dwellings - Open space and strategic landscaping	<i>Additional Housing Options:</i> BER016 Bevans Hill Farm, Lynch Road - 45 dwellings here BER017 Hook Street Farm, Lynch Road - 15 dwellings	BER016 and BER017	No – sites first identified as part of the Additional Housing Options consultation in October 2020	Yes – sites from the Additional Housing Options consultation are now combined. The south western area of the site has been removed to exclude area subject to flooding.
PS34 Sharpness Docks - 300 dwellings, including 90 affordable dwellings - Hotel, holiday lodges, fixed camping uses and expanded marina basin - Tourism and recreational related facilities, including a community football pitch, community gardens and informal green space - Contributions towards education provision - Landscaping incorporating existing hedgerows and trees	<i>Draft Plan:</i> PS34 Sharpness Docks - Dock uses, associated industrial and distribution uses (including 7ha expansion land) - Tourism uses - Leisure and recreational development - 300 dwellings <i>Emerging Strategy:</i> PS34 Sharpness Docks - 300 dwellings - 7ha employment land - Tourism, leisure, and recreational uses	NEW001 Sharpness Docks	NEW001 appraised for mixed use	No - equivalent to site NEW001 in Emerging Strategy Paper, Draft Plan and Pre-submission Plan.
PS35 Land at Focus School, Wanswell - 70 dwellings - Community use and open space, including the retention and	<i>Draft Plan:</i> PS35 Land at Focus School, Wanswell - 70 dwellings - Community and open space uses (including the	NEW006 Land at Focus School-Berkeley Campus, Station Road	NEW006 appraised for residential use only	No - equivalent to site NEW006 in Emerging Strategy Paper, Draft Plan and Pre-submission Plan.

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enhancement of existing playing pitches and open space	retention and enhancement of existing open space) <i>Emerging Strategy:</i> PS35 Land at Focus School, Wanswell - 70 dwellings - Community and open space uses			
<p>PS36 Sharpness new settlement</p> <ul style="list-style-type: none"> <li>- 2,400 dwellings by 2040 (5,000 by 2050</li> <li>- 10 ha of B1, B2 and B8 employment land and ancillary employment uses</li> <li>- Primary school and contributions towards the provision of a secondary school</li> <li>- Multifunctional Green Infrastructure and managed new nature reserve</li> <li>- On-site community and sports built provision and contributions to off-site indoor sports and leisure facilities</li> <li>- Landscaping buffers</li> <li>- Local centre, incorporating employment, local retail, surgery and other community uses</li> <li>- Zero carbon energy generation</li> <li>- New railway station and enhancements to the Sharpness branch line and</li> </ul>	<p><i>Draft Plan:</i> PS36 New settlement at Sharpness</p> <ul style="list-style-type: none"> <li>- 10ha employment land</li> <li>- 2,400 dwellings by 2040 (5,000 dwellings by 2050 when PS36a taken forward)</li> <li>- Shops and community uses</li> <li>- Primary and secondary schools</li> <li>- Open space uses</li> <li>- Strategic landscaping</li> <li>- Green infrastructure</li> </ul> <p><i>Emerging Strategy:</i> PS36 Land south and east of Sharpness Docks and Newtown</p> <ul style="list-style-type: none"> <li>- 2,400 dwellings by 2040</li> <li>- 10ha employment land</li> <li>- Community and open space uses</li> </ul>	<p>Includes: part of NEW002 Land at Sharpness (Sanigar Farm); NEW002a Additional land at Newtown and Wanswell; NEW003a Land south of Sharpness Primary School; NEW003b Land at Sanigar Lane; and NEW005 Land north of Oakfield Way. Land to the south of site SA5A South of Severn Distribution Park removed.</p>	<p>NEW002 appraised for mixed use, NEW003a, NEW003b and NEW005 appraised for housing NEW002a appraised for residential, employment, and community facilities (as per SALA 2019)</p>	<p>Yes - the site boundary of NEW002 was adjusted for PS36 in Emerging Strategy Paper. The boundary of PS36 in Draft Plan now also includes also includes NEW002a and NEW005. No further change to site boundary in Pre-submission Plan.</p>

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contributions to support a regular passenger service to Gloucester				
<p>PS37 Wisloe new settlement</p> <ul style="list-style-type: none"> <li>- 1,500 dwellings</li> <li>- 5 ha of office, B2 and B8 employment land and ancillary employment uses</li> <li>- Primary school and contributions towards secondary school</li> <li>- Multifunctional Green Infrastructure</li> <li>- Local centre, incorporating local retail, surgery and community uses</li> <li>- Landscaping buffers</li> <li>- Zero carbon energy generation</li> </ul>	<p><i>Draft Plan:</i> PS37 New settlement at Wisloe</p> <ul style="list-style-type: none"> <li>- 5ha employment land</li> <li>- 1500 dwellings</li> <li>- Shops and community uses</li> <li>- Primary school(s)</li> <li>- Open space uses</li> <li>- Strategic landscaping</li> </ul> <p>Green infrastructure</p> <p><i>Emerging Strategy:</i> PS37 Land at Wisloe</p> <ul style="list-style-type: none"> <li>- 1500 dwellings by 2040</li> <li>- 5ha employment land</li> <li>- Community and open space uses</li> </ul>	Includes: SLI002 Land at Cambridge/Coaley A; SLI004 Lane east of Gossington; SLI005 Land south of Cambridge; SLI006 M D Collins Steel Buildings Ltd; and SLI007 Land south of Slimbridge (Wisloe) roundabout.	SLI002, SLI004 and SLI005 have been appraised together for mixed use previously SLI006 appraised for residential and employment and SLI007 appraised for residential, employment, and community facilities (as per SALA 2019)	Yes – site boundary equivalent to sites SLI002, SLI004 and SLI005 in the Emerging Strategy Paper, however, the boundary of PS37 in Draft Plan has been adjusted to include SLI006 and SLI007. No further change to site boundary in Pre-submission Plan.
<p>PS44 Northwest of Whitminster Lane</p> <ul style="list-style-type: none"> <li>- 30 dwellings</li> <li>- Open space uses</li> </ul>	<p><i>Draft Plan:</i> PS44 Northwest of Whitminster Lane</p> <ul style="list-style-type: none"> <li>- 30 dwellings</li> <li>- Community and open space uses</li> </ul> <p><i>Emerging Strategy:</i> - Not included</p>	FRA004 Fields northwest of Whitminster Lane	FRA004 appraised for residential use only	Yes – site boundary at Pre-submission stage site boundary is reduced to include only western half of the site included at the Draft Plan stage.
<p>PS45 Land west of Upton’s Gardens</p> <ul style="list-style-type: none"> <li>- 10 dwellings</li> <li>- Open space uses and strategic landscaping</li> </ul>	<p><i>Draft Plan:</i> PS45 Land west of Upton’s Gardens</p> <ul style="list-style-type: none"> <li>- 10 dwellings</li> <li>- Community and open space uses</li> <li>- Strategic landscaping</li> </ul> <p>Not included in <i>Emerging Strategy:</i> - Not included</p>	WHI004 Land west of Upton's Garden	WHI004 appraised for residential use only	No – at Draft Plan and Pre-submission stage site boundary is equivalent to site WHI004 appraisal of which was presented in previous iterations of the SA Report.
<p>PS46 Land west of School Lane</p> <ul style="list-style-type: none"> <li>- 40 dwellings</li> <li>- open space uses and strategic landscaping</li> </ul>	<p><i>Draft Plan:</i> PS46 Land west of School Lane</p> <ul style="list-style-type: none"> <li>- 30 dwellings</li> <li>- Community and open space uses</li> </ul> <p>Strategic landscaping</p> <p><i>Emerging Strategy:</i></p>	Part of WHI005 Land West of School Lane (equivalent to broad location WHI A)	WHI005 appraised for residential use only	Yes - the site boundary of WHI005 adjusted for PS46 in the Draft Plan. Appraisal of WHI005 was presented in previous iterations of the SA Report. No

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	- Not included			further change to site boundary in Pre-submission Plan.
PS38 South of Wickwar Road - 50 dwellings - Open space uses and strategic landscaping	<i>Draft Plan:</i> PS38 South of Wickwar Road - 50 dwellings - Community and open space uses - Strategic landscaping <i>Emerging Strategy:</i> PS38 South of Wickwar Road - 50 dwellings - Open space uses	Includes: KIN005 Land at Cloverlea Barn and KIN011 Land south of Westfield House	KIN005 and KIN0011 appraised for residential use only	No - equivalent to sites KIN005 and KIN011 in Emerging Strategy Paper, Draft Plan and Pre-submission Draft Pan.
PS47 Land west of Renishaw New Mills - 10ha office, B2 and B8 employment uses - Landscaping buffers - Contributions to the reopening of Charfield rail station - Contributions towards the completion of the Wotton – Charfield – Kingswood Greenway	<i>Draft Plan:</i> PS47 Land west of Renishaw New Mills - 9ha employment land - Strategic landscaping <i>Emerging Strategy:</i> - Not included	KIN012	KIN012 appraised for employment use only (as per SALA 2019)	No - at Draft Plan and Pre-submission stage site boundary is equivalent to site KIN012 promoted through the 2019 SALA.
PS41 Washwell Fields - 20 dwellings and open space uses	<i>Draft Plan:</i> PS41 Washwell Fields - 20 dwellings - Community and open space uses - Strategic landscaping <i>Emerging Strategy:</i> PS41 Washwell Fields - 20 dwellings - Open space uses	PAI004 (part) Washwell Fields (equivalent to broad location PAI A)	PAI004 appraised for residential use only	Yes - the site boundary of PAI004 was adjusted for PS41 in Emerging Strategy Paper. PS41 remains equivalent from Emerging Strategy Paper to Draft Plan and to Pre-submission Plan.



## Summary of SA findings for the local site allocations

- 5.10 The majority (22 sites) of the 23 local site allocations are expected to have minor positive effects in relation to SA objective 1: **housing**. These are sites that would support the delivery of new homes in the District. Negligible effects are expected in relation to this SA objective for one of the local sites at Dursley (PS27) as it is designated for town centre uses and will not provide new housing. One site at Minchinhampton (PS05a) is not currently allocated, but is included as safeguarded land with the potential to meet the future housing needs of the settlement. The positive effect for this site would occur in the longer term given that the principle of development of the site for housing will be considered at the next Local Plan review.
- 5.11 Two of the local site allocations at Brimscombe and Thrupp (PS02), and Nailsworth (PS06) include existing open space or recreation facilities (for example an area of green space or cycle route) which might be lost to development dependent upon its specific design. As these facilities might otherwise be used by residents to encourage more active lifestyles in the District and benefit public health, uncertain significant negative effects have been identified in relation to SA objective 2: **health**. However, these two local site allocations (PS02 and PS06) also allow for an area of open space to be incorporated as part of the development. Therefore, a significant positive effect has also been recorded as part of a mixed overall effect. The majority of the remaining local site allocations are expected to have a significant positive effect in relation to this SA objective as they are either located within close proximity (400m) of a doctor's surgery and an area of open space and a cycle route, or would incorporate an area of open space as part of the development. For site STR065 at Stroud, the significant positive effect reflects the requirement to incorporate healthcare facilities at the site.
- 5.12 In total, 12 of the 23 local site allocations are located on brownfield land or would provide new community facilities which is expected to have minor positive effects in relation to SA objective 5: **vibrant communities**. Sites located at Brimscombe and Thrupp (PS01 and PS02), Nailsworth (PS06), Stroud (PS10, PS11, PS12 and STR065), Stonehouse (PS17), Dursley (PS27 and PS28) and Newtown and Sharpness (PS35) contain a large portion of brownfield land and it is expected that development at these sites could help to promote regeneration at these settlements. S
- 5.13 These sites are also expected to have minor positive effects in relation to SA objective 13: **efficient land use** and uncertain minor positive effects in relation to SA objective 15: **waste**. The re-use of brownfield land represents more efficient land use in the District and would prevent the loss of higher value agricultural soil. The development of brownfield land may allow for the re-use of materials already onsite. A minor positive effect is expected in relation to SA objective 5: vibrant communities for one of the site allocations (PS05, at Minchinhampton) that is located on greenfield land. This site is to be developed to provide new community uses. Significant negative effects are expected in relation to SA objective 13 for 12 of the local site allocations which are located on a large amount of greenfield land and/or take in Grade 1, 2 or Grade 3 agricultural soils.
- 5.14 The Tier 1 settlements in the District provide access to a good range of existing services and facilities. Sites at these settlements (PS10, PS11, PS12 and STR065, at Stroud; PS17, at Stonehouse; and PS27 and PS28, at Dursley) are likely to provide a good level of access to a range of existing services and facilities. Significant positive effects are therefore expected in relation to SA objective 6: **services and facilities**. All of these seven sites would also incorporate new community uses, town centre uses or other types of services and facilities. This is likely to improve access to services and facilities for a relatively high number of existing residents considering the location of these sites at the larger settlements of the plan area.
- 5.15 Sites at Brimscombe and Thrupp (PS01 and PS02), Minchinhampton (PS05), Nailsworth (PS06) and Newtown and Sharpness (PS35) would also provide new community or town centre uses but are not directly at a Tier 1 settlement or within a town centre. Therefore, the positive effects expected in relation to SA objective 6: services and facilities are likely to be minor. Site PS35 at Newtown and Sharpness is expected to have a significant negative effect in relation to SA objective 6 given that it is not directly adjacent to the settlement development limits. However, the development of the site will incorporate new community uses and therefore a minor positive effect is expected in combination. The remaining local site allocations would not include the

delivery of new services and facilities and are at Tier 2 or Tier 3a settlements. Given that service provision at these settlements is more limited than at the Tier 1 settlements, but is still considered to be relatively good and is of a range to meet local needs, a minor positive effect is expected for these sites in relation to SA objective 6.

- 5.16 The development of only one of the 23 local site allocations (PS02, at Brimscombe and Thrupp ) is likely to result in the loss of existing green infrastructure assets within the site boundaries. This site contains at least part of a greenspace. Site PS02 is to be developed to incorporate new open space uses but the development could result in an overall net loss of greenspace. A significant negative effect is therefore identified in relation to SA objective 7: **biodiversity/geodiversity** for this local site allocation. Twenty-one of the local site allocations are expected to have minor negative effects in relation to SA objective 7. These sites are located between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites or are within 250m of a locally designated site. Some of these sites are within 3km of Rodborough Common SAC or within 7.7km of Severn Estuary SAC/SPA/Ramsar site which are the respective catchment zones established around these designated sites within which new residential development has the potential to contribute to recreational pressure.
- 5.17 For nine sites at Brimscombe and Thrupp (PS01 and PS02), Minchinhampton (PS05), Nailsworth (PS06), Dursley (PS27 and PS28), Berkeley (PS33), Whitminster (PS45) and Kingswood (PS38), minor positive effects are expected in combination with the negative effects identified. Development at these sites is to incorporate green infrastructure and/or other mitigation measures in line with the relevant Pre-submission Local Sites Allocation Policy, which result in improved habitat and wider habitat connectivity in the area.
- 5.18 The HRA work undertaken for the plan<sup>58</sup> screened in all individual site allocations for likely significant effects in combination in relation to water issues for the Severn Estuary SAC/SPA/Ramsar site and air quality for the Cotswolds Beechwoods SAC and Rodborough Common SAC. Likely significant recreation effects were also identified for a number of the local site allocations in combination with regards to Cotswolds Beechwoods SAC (HAR017, PS01, PS02, PS05, PS06, PS10, PS11, PS12, PS16, PS17, PS41, PS42, PS44, PS45, PS46 and STR065), Rodborough Common SAC (PS01, PS02, PS05, PS06, PS10, PS11, PS12, PS16, PS42 and STR065) and the Severn Estuary SAC/SPA/Ramsar site (sites BER016/17, HAR017, PS16, PS17, PS28, PS33, PS35, PS42, PS44, PS45 and PS46).
- 5.19 The appropriate assessment addresses the significant effects identified in relation to water issues for the Severn Estuary SAC/SPA/Ramsar site. Wastewater issues are to be resolved as part of project level HRA for seven strategic sites (see the section below on strategic housing and mixed use site allocations). The plan contains policy wording for these requirements. With regards to significant effects relating to air quality, the appropriate assessment also concluded that traffic increases and air quality impacts could be ruled out for Rodborough Common SAC alone and there is no need for an assessment of in-combination effects. The relatively low levels of traffic forecast for the Local Plan Review means that adverse effects on integrity relating to air quality for Cotswolds Beechwoods SAC can also be ruled out for the Local Plan alone. Traffic modelling incorporating committed development from adjacent authorities indicates that traffic flows will be relatively low and therefore in-combination adverse effects on integrity of Cotswolds Beechwoods SAC have also been ruled out. However, this in-combination assessment work does not include growth in the Joint Core Strategy (JCS) review, which is at a very early stage and as this review progresses, there may be adverse effects in-combination. The HRA highlights that appropriate mitigation measures relating to recreation are set out through the strategic approaches currently in place relating to recreation pressures on the Rodborough Common SAC<sup>59</sup> and the Severn Estuary SAC/SPA/Ramsar<sup>60</sup> and that the plan also references the draft strategy for the Cotswolds Beechwoods SAC<sup>61</sup>. Some uncertainty exists relating to the effects of sites on the Rodborough Common and Severn Estuary designations given that the HRA states that adopted strategies

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<sup>58</sup> Footprint Ecology on behalf of Stroud District Council (2021) *Habitats Regulations Assessment of the Stroud District Local Plan Review Pre-submission Draft Plan*

<sup>59</sup> Stroud District Council (2015) *Interim Strategy for Avoidance of Likely Significant Adverse Effects on Rodborough Common Special Area of Conservation (SAC)*

<sup>60</sup> Stroud District Council (2017) *Strategy for Avoidance of Likely Significant Adverse Effects on the Severn Estuary SAC, SPA and Ramsar Site*

<sup>61</sup> Footprint Ecology on behalf of Stroud District Council (2021) *Cotswold Beechwoods SAC Recreation Mitigation Strategy*

require updating to ensure they will deliver sufficient mitigation to address the scale of growth in the plan. However, adverse effects on integrity, alone or in combination are ruled out with a view to this work being done.

- 5.20 Effects relating to biodiversity are uncertain depending on the detailed proposals that eventually come forward at each site and the types of habitats and species present at the nature conservation sites. In addition, mitigation of potentially significant effects relating to biodiversity is provided by requirements in other policy approaches in the Local Plan Review.
- 5.21 The settlements of Minchinhampton and Painswick fall within the AONB and areas around both have been identified as having higher landscape sensitivity to residential development through the Landscape Sensitivity Assessment undertaken for the District. Three local site allocations (PS05, PS05a and PS41) at the edge of these settlements are expected to have significant negative effects in relation to SA objective 8: **landscape/townscape**. All three sites lie within the AONB and site PS41 also lies on land which have been identified as having high/medium sensitivity to residential development. For 20 of the site allocations, minor negative effects are expected due to these areas being identified as having medium/low or medium landscape sensitivity to residential development, or due to lying in close proximity to but not within the AONB. Many of the Local Sites Allocations Policies require the sites to be developed to incorporate a landscaping buffer, retain existing mature trees or other measures to help ensure the protection of existing landscape character. For these sites a minor positive effect is expected in combination with the negative effect recorded in relation to SA objective 8. This is the case for 14 sites at Minchinhampton (PS05), Nailsworth (PS06), Leonard Stanley (PS16 and PS42), Dursley (PS27 and PS28), Hardwicke (HAR017), Berkeley (PS33 and BER016/017), Frampton on Severn (PS44), Whitminster (PS45 and PS46), Kingswood (PS38) and Painswick (PS41).
- 5.22 Heritage impact assessment work has been undertaken as part of the SALA for Stroud. The work identified potential heritage constraints and the potential for development to impact on elements of the historic environment. It also concludes that opportunities may exist to achieve benefits in relation to the historic environment at seven local site allocations. These sites lie at the settlements of Brimscombe and Thrupp (PS01 and PS02), Stroud (PS10, PS11, PS12 and STR065) and Dursley (PS27) meaning that an uncertain minor positive effect is expected in relation to SA objective 9: **historic environment**. All of these effects are expected as part of an overall mixed effect with the negative effect expected in relation to five sites at Brimscombe and Thrupp (PS01 and PS02), Stroud (PS10, PS11 and PS12) likely to be significant given the particular sensitivity of these locations as per the findings of the SALA heritage impact assessment work.
- 5.23 For a further four local site allocations (PS05, at Minchinhampton; PS28, at Dursley; PS45, at Whitminster; and HAR017, at Hardwicke), mixed negative and positive effects are also expected. The SALA heritage impact assessment work identified sensitivities relating to the historic environment for the development of these sites but did not highlight specific opportunities for the enhancement of heritage assets and their settings. However, mitigation measures are set out in the Local Sites Allocation Policies for these sites. Based on the SALA heritage findings, a significant negative effect alone is expected in relation to SA objective 9: historic environment for one site allocations at Minchinhampton (PS05a). It should be noted that this land is safeguarded for potential future housing development. The principle of development is to be considered through the next Local Plan Review which may allow for mitigation of the potential heritage sensitivities of the site to be address if it is to be allocated through this future review. There are nine sites which have been screened out of the SALA heritage assessment or identified through that work to have no significant heritage constraints. These sites are expected to have a negligible effect in relation to SA objective 9. For site PS41 at Painswick a minor positive effect alone is expected in relation to this SA objective. The SALA heritage impact assessment work identified the site as having no significant heritage constraints. Furthermore, the Local Sites Allocation Policy for this site directly requires that development conserves nearby heritage interests and their setting.
- 5.24 The SALA Transport Assessment rated the accessibility of sites by walking, car and bus in the District to town/district/local centres, employment sites and services and facilities that people may be required to access on a regular basis. The findings of this assessment work have informed the sustainability effects identified in relation to SA objective 10: **air quality**. A lower SALA score indicates lower likely overall emissions from traffic, and therefore more positive effects in terms

of this SA objective. With regards to the Tier 1 settlements, significant positive effects are expected in relation to SA objective 10 for five of the site allocations at Stroud (PS10, PS11, PS12 and STR065) and Dursley (PS28). The Local Sites Allocation Policy for sites PS10 and PS28 could help to strengthen the positive effects recorded in relation to this SA objective given that they require public transport or pedestrian access improvements to be incorporated at these sites.

- 5.25 Minor positive effects are expected in relation to SA objective 10: air quality for sites at Stonehouse (PS17), Dursley (PS27), Hardwicke (HAR017) and Berkeley (PS33). This is due to the proximity of these sites to existing services and facilities and sustainable transport links. Five of the local site allocations at Newtown and Sharpness (PS35), Frampton on Severn (PS44), Whitminster (PS45 and PS46) and Kingswood (PS38) are expected to have minor negative effects. These sites are less well related to existing services and facilities and sustainable transport links. Residents and other users of these sites are likely to be required to travel by car more frequently to and from these locations.
- 5.26 Drinking Water Safeguarding Zones or Source Protection Zones cover much of the area at the settlements Brimscombe and Thrupp, Minchinhampton, Nailsworth, Stroud, Leonard Stanley, Stonehouse, Cam, Dursley and Painswick. As such, a total of 17 local site allocations which are at or in close proximity to these settlements have the potential to have adverse impacts in terms of protecting water sources in the District. An uncertain significant negative effect has been identified in relation to SA objective 11: **water quality** for these sites. The remaining six local site allocations are not found in close proximity to these zones, and therefore a negligible effect is expected in relation to this SA objective.
- 5.27 Of the 23 local site allocations, three contain large portions of land which are within flood zones 3a or 3b. These sites are at Brimscombe and Thrupp (PS01 and PS02) and Berkeley (PS33) and are expected to have a significant negative effect in relation to SA objective 12: **flooding**. Eleven local site allocations lie on greenfield land outside of flood Zone 3 and therefore a minor negative effect in relation to SA objective 12 has been identified. Development on this land would increase the area of impermeable surfaces in the plan area which could impact the infiltration of surface water. A further nine sites lie mostly on brownfield land outside of flood zone 3, and therefore a negligible effect is expected. For six sites (PS01 and PS02, at Brimscombe and Thrupp; PS05, at Minchinhampton; HAR017, at Hardwicke; PS33 and BER016/17, at Berkeley) a minor positive effect is expected in combination with the negative effect. The requirements set out in the Local Sites Allocation Policies for these sites include the incorporation of measures which would limit the potential any increase in local flood risk.
- 5.28 Five of the 23 local site allocations are expected to have a significant negative effect alone in relation to SA objective 16: **employment**. Sites at Leonard Stanley (PS42), Hardwicke (HAR017), Newtown and Sharpness (PS35) and Whitminster (PS45 and PS46) would provide uses which would do not include employment and are either further than 1km from an employment site and are not at a Tier 1 or Tier 2 settlement, or could result in development which would involve the loss of an existing employment use. One additional site in Stroud (PS12) is in close proximity to a number of employment sites and is at a Tier 1 settlement, but is currently in employment use meaning that existing employment opportunities could be lost as new development is delivered at this site. As such a mixed significant positive and significant negative effect is expected in relation to SA objective 6 for this site. Sites at Stroud (STR065), Stonehouse (PS17), Dursley (PS28), and Berkeley (PS33) are expected to have a significant positive effect alone in relation to this SA objective 16. These sites are those which would provide residential uses in close proximity to a key employment site and within a Tier 1 or Tier 2 settlement.
- 5.29 Of the remaining 13 sites, 12 are expected to have a minor positive effect in relation to SA objective 16. These are sites that are close (within 600m) to a key employment site or at a Tier 1 or 2 settlement. Only one site at Leonard Stanley (PS16) is expected to have a minor negative effect in relation to SA objective 16. While this site is relatively close (600m-1km) to a key employment site it is not at a Tier 1 or 2 settlement.
- 5.30 One local site allocations at Stonehouse (PS17) would provide new residential development which is located in close proximity to existing primary and secondary educational facilities. It is expected that this site would help to promote longer term economic growth in the District, including through the promotion of higher levels of educational attainment. A significant positive effect is therefore expected in relation to SA objective 17: **economic growth** for this local site

allocation. The remaining 22 local site allocations are expected to have a minor positive effect in relation to this SA objective. Some of these sites are located in close proximity of either a primary or secondary school, but not both. Some of the sites would provide uses (such as town centre uses) which could support some new employment opportunities.

**Table 5.2 Summary of likely sustainability effects of local site allocations**

SA Objectives	SA 1: Housing	SA 2: Health	SA 3: Social inclusion	SA 4: Crime	SA 5: Vibrant communities	SA 6: Services and facilities	SA 7: Biodiversity/geodiversity	SA 8: Landscapes/townscapes	SA 9: Historic environment	SA 10: Air quality.	SA 11: Water quality	SA 12: Flooding	SA 13: Efficient land use	SA 14: Climate change	SA 15: Waste	SA 16: Employment	SA 17: Economic growth
<b>Brimscombe and Thrupp</b>																	
PS01	+	++/-	0	0	+	+	+/-?	-?	+/--?	0	--?	+/--	+	0	+?	+	+?
PS02	+	++/- -?	0	0	+	+	+/--?	-?	+/--?	0	--?	+/--	+	0	+?	+?	+?
<b>Minchinhampton</b>																	
PS05	+	++	0	0	+	+	+/-?	+/--?	+/--?	0	--?	+/-	--?	0	0	+	+
PS05a	+	++	0	0	0	+	-?	--?	--	0	--?	-	--?	0	0	+	+
<b>Nailsworth</b>																	
PS06	+	++/- -?	0	0	+	+	+/-?	+/-?	0	0	--?	0	+	0	+?	+	+?
<b>Stroud</b>																	
PS10	+	++	0	0	+	++	-?	-?	+/--?	++	--?	0	+	0	+?	+	+?
PS11	+	++	0	0	+	++	-?	-?	+/--?	++	--?	0	+	0	+?	+	+?
PS12	+	++	0	0	+	++	-?	-?	+/-?	++	--?	0	+	0	+?	++/- -	+?
STR065	+	++	0	0	+	++	-?	-?	+/0?	++	--?	0	+	0	+?	++	+?
<b>Leonard Stanley</b>																	
PS16	+	++/-	0	0	0	+	-?	+/-?	0	0	--?	-	--?	0	0	-	+?
PS42	+	++/-	0	0	0	+	0?	+/-?	0	0	--?	-	--?	0	0	--	+?
<b>Stonehouse</b>																	
PS17	+	+	0	0	+	++	-?	-?	0	+	--?	0	+	0	+?	++	++?
<b>Dursley</b>																	
PS27	0	++	0	0	+	++	+/-?	+/-?	+/-?	+	--?	0	+	0	+?	+	+
PS28	+	++	0	0	+	++	+/-?	+/-?	+/-	++	--?	0	+	0	+?	++	+?

SA Objectives	SA 1: Housing	SA 2: Health	SA 3: Social inclusion	SA 4: Crime	SA 5: Vibrant communities	SA 6: Services and facilities	SA 7: Biodiversity/geodiversity	SA 8: Landscapes/townscapes	SA 9: Historic environment	SA 10: Air quality.	SA 11: Water quality	SA 12: Flooding	SA 13: Efficient land use	SA 14: Climate change	SA 15: Waste	SA 16: Employment	SA 17: Economic growth
<b>Hardwicke</b>																	
HAR017	+	++/-	0	0	0	+	-?	+/-?	+/-	+	0	+/-	--?	0	0	--	+?
<b>Berkeley</b>																	
PS33	+	++	0	0	0	+	+/-?	+/-?	0	+	0	+/--	--?	0	0	++	+?
BER016/017	+	++	0	0	0	+	-?	+/-?	0	0	0	+/-	--?	0	0	+	+?
<b>Newtown &amp; Sharpness</b>																	
PS35	+	++/-	0	0	+	+/--	-?	-?	0	-	0	0	+	0	+?	--	+?
<b>Frampton on Severn</b>																	
PS44	+	++	0	0	0	+	-?	+/-?	-	-	0	-	--	0	0	+	+?
<b>Whitminster</b>																	
PS45	+	++/-	0	0	0	+	+/-?	+/-?	+/-	-	--?	-	--?	0	0	--	+?
PS46	+	++/-	0	0	0	+	-?	+/-?	0	-	--?	-	--?	0	0	--	+?
<b>Kingswood</b>																	
PS38	+	++/-	0	0	0	+	+/-?	+/-?	0	-	0	-	--?	0	0	+	+?
<b>Painswick</b>																	
PS41	+	++	0	0	0	+	-?	+/--?	+	0	--?	-	--?	0	0	+	+?

## Summary of SA findings for the strategic employment site allocations

- 5.31 Sites PS32 and PS43 at Hunts Grove and site PS47 at Kingswood are included in the Pre-submission Draft Local Plan as Employment Allocations. Negligible effects are therefore expected in relation to SA objective 1: **housing** as these sites will not contribute to meeting the District's housing need.
- 5.32 Minor positive effects are expected for all three employment site allocations in relation to SA objective 2: **health**. This effect reflects their location within 800m of areas of open space, which could be used by employees for recreation and leisure purposes. All three of the employment site allocations are located on greenfield land and therefore there is less potential for them to contribute to local regeneration. As such, negligible effects are expected for all three sites in relation to SA objective 5: **vibrant communities**.
- 5.33 None of the employment site allocations are located within 1km of internationally or nationally designated biodiversity sites. They also are not located within 250m of any locally designated sites. As a result, negligible effects are expected for all three employment allocations in relation to SA objective 7: **biodiversity/geodiversity**. The HRA work undertaken for the plan<sup>62</sup> screened in all individual site allocations for likely significant effects in combination in relation to water issues for the Severn Estuary SAC/SPA/Ramsar site. The appropriate assessment addresses the significant effects identified in relation to water issues for the Severn Estuary SAC/SPA/Ramsar site. Wastewater issues are to be resolved as part of project level HRA for seven sites (see the section below on strategic housing and mixed use site allocations) and the plan contains policy wording for these requirements, meaning adverse effects on integrity can be ruled out.
- 5.34 Effects relating to biodiversity are uncertain depending on the detailed proposals that eventually come forward at each site and the types of habitats and species present at the nature conservation sites. In addition, mitigation of potentially significant effects relating to biodiversity is provided by requirements in other policy approaches in the Local Plan Review.
- 5.35 Through the landscape sensitivity assessment undertaken as part of the Gloucestershire Strategic Development Opportunities work, all of the employment allocations are located in areas that have been identified as having medium-high sensitivity to development. As such, significant negative effects are expected for the sites in relation to SA objective 8: **landscapes/townscapes**. A minor positive effect is expected in combination for all three employment sites given the requirements set out in the relevant site allocation policies. At all three sites strategic landscaping buffers are to be incorporated and there is a requirement for development to protect the existing setting of the area and views relating to the AONB.
- 5.36 Heritage impact assessment work has been undertaken as part of the SALA for Stroud. The work identified potential heritage constraints and the potential for development to impact on elements of the historic environment. Employment site allocations PS32 and PS43 at Hunts Grove were screened out of the SALA heritage assessment as having no heritage impacts and therefore negligible effects are expected for these sites in relation to SA objective 9: **historic environment**. Employment site allocation PS47 scored 3 in the SALA heritage assessment and therefore a significant negative effect is expected in relation to SA objective 8. However, the employment allocation policy includes the re-use of farm buildings on-site as a requirement as well as careful siting of new buildings so as to minimise impacts on heritage assets. A minor positive effect is therefore also expected for the site as part of an overall mixed effect.
- 5.37 None of the employment site allocations are located within 1km of a railway station, which may limit the potential for employees to access the sites without the use of the private car. However, they are all within 400m of bus stops, which could allow employees to access the site using bus services. This may potentially limit some impacts on air quality arising from the increased transport movements the delivery of the sites will generate. As such, minor positive effects are expected for all three sites in relation to SA objective 10: **air quality**. The site allocation policies

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<sup>62</sup> Footprint Ecology on behalf of Stroud District Council (2021) *Habitats Regulations Assessment of the Stroud District Local Plan Review Pre-submission Draft Plan*



for the employment sites include requirements to provide sustainable transport measures to link sites PS32 and PS43 with Gloucester City, Stonehouse and Stroud. In the case of site PS47, by Kingswood, development of the site will be supported by contributions towards the completion of the Wotton – Charfield – Kingswood Greenway, the enhancement of local bus services and reopening of Charfield rail station. These measures could help to encourage modal shift amongst site users which could help to strengthen the minor positive effect recorded for these sites in relation to SA objective 10. However, the measures required are not deemed substantial enough to record a significant positive effect in relation to this SA objective.

- 5.38 None of the employment site allocations are located within a Drinking Water Safeguarding Zone or a Source Protection Zone and therefore negligible effects are expected in relation to SA objective 11: **water quality**. All three of the sites lie mostly outside of flood zones 3a and 3b, but they are located on greenfield land and therefore minor negative effects are expected for the sites in relation to SA objective 12: **flooding**. Employment site allocation policy PS47 at Kingswood requires that development includes a strategy for attenuating and disposing of surface water through SuDS, given the sites proximity to Ozleworth Brook which runs at its northern edge. As such, a minor positive effect is also expected for this site in combination with the negative effect identified.
- 5.39 Employment site allocations PS43 and PS47 contain large portions of Grade 2 agricultural land and employment site allocation PS32 is located in an area of Grade 3 agricultural land. Additionally, all three of the sites are located on greenfield land. Therefore, significant negative effects are expected for all three employment site allocations in relation to SA objective 13: **efficient land use**. Of land that is classed as Grade 3 agricultural, only Grade 3a is classed as high quality. Given that the data is not currently available to differentiate between areas of Grade 3a and Grade 3b land for sites that contain Grade 3 agricultural land, the significant negative effect recorded for site PS32 is uncertain. As the sites are all located on greenfield land, there will be limited potential for the reuse of onsite buildings and materials. As such, negligible effects are expected for the sites in relation to SA objective 15: **waste**.
- 5.40 Given their allocation to deliver employment land in the District, all three of the sites are expected to have positive effects in relation to SA objective 16: **employment** and SA objective 17: **economic growth**. Employment site allocation PS32 is less than 10ha in size and therefore minor positive effects are expected in relation to SA objective 16 and 17. However, employment site allocations PS43 and PS47 will deliver over 10ha of employment land and as a result significant positive effects are expected for these sites in relation to SA objective 16 and 17.

**Table 5.3 Summary of likely sustainability effects of strategic employment allocations**

SA Objectives	SA 1: Housing	SA 2: Health	SA 3: Social inclusion	SA 4: Crime	SA 5: Vibrant communities	SA 6: Services and facilities	SA 7: Biodiversity/geodiversity	SA 8: Landscapes/townscapes	SA 9: Historic environment	SA 10: Air quality.	SA 11: Water quality	SA 12: Flooding	SA 13: Efficient land use	SA 14: Climate change	SA 15: Waste	SA 16: Employment	SA 17: Economic growth
<b>Hunts Grove</b>																	
PS32	0	+	0	0	0	0	0?	+/--?	0	+	0	-	--?	0	0	+	+
PS43	0	+	0	0	0	0	0?	+/--?	0	+	0	-	--	0	0	++	++
<b>Kingswood</b>																	
PS47	0	+	0	0	0	0	0?	+/--?	+/--	+	0	+/-	--	0	0	++	++

## Summary of SA findings for the strategic housing and mixed use site allocations

- 5.41 All strategic housing and mixed use sites are set out in the Pre-submission Draft Local Plan as site allocations for extensions of existing settlements or new settlements in their own right. Many of the sites would deliver a substantial amount of new housing. Of the ten sites, only the Eco Park M5 Junction 13, Stonehouse (PS20), Cam North East Extension (PS25) and Sharpness Docks (PS34) would deliver less than 600 homes. The Eco Park M5 Junction 13, Stonehouse site (PS20) would help contribute to specialist housing needs in the District by providing a 70 bed care village. A minor positive effect is expected for these three sites in relation to SA objective 1: **housing**. The positive effect for the remaining seven sites is significant given that they are each expected to deliver more than 600 homes. It should be noted that the significant positive effect for the Land at Whaddon site (G2) would occur in the longer term given that the Pre-submission Draft Local Plan safeguards this site for at least 3,000 dwellings (30% affordable) to help address the future housing needs of Gloucester City, if required.
- 5.42 All sites are required by their respective Strategic Site Allocation Policy to be delivered to incorporate improvements which are likely to benefit public health and wellbeing. Significant positive effects are therefore expected for all ten strategic sites in relation to SA objective 2: **health**. Notable health related improvements are to be made at sites at South of Hardwicke (G1), Land at Whaddon (G2), Sharpness new settlement (PS36) and Wisloe new settlement (PS37) where new surgeries are to be delivered as part of development. The site allocation policies for sites at Cam (PS24 and PS25) include the requirement for contributions towards off-site indoor sports and leisure facilities and the extension of existing health facilities at Cam. While these requirements are not as substantial as the requirement to provide new healthcare facilities onsite, they are also likely to benefit health and wellbeing in the plan area. For all sites the positive effect is expected to be combined with a negative effect. For the Eco Park M5 Junction 13, Stonehouse site (PS20), Land at Whaddon (G1), Sharpness Docks (PS34) and Sharpness new settlement (PS36) the negative effect is significant. These are sites which presently contain an area of open space or an active transport route which might be lost to or adversely affected by development. The minor negative effect recorded for the remaining six strategic sites reflects the lack of nearby access to an existing GP surgery. Where new surgeries are required at these sites (G2 and PS37) the minor negative effect identified could be addressed. However, this would depend on the timing of the delivery of new facilities of this type and earlier occupiers of the site may lack access to the new provisions.
- 5.43 Development at all strategic site allocations will include some uses (such as community, sports and/ recreation) which could contribute to the creation of more engaged and vibrant communities. A positive effect is therefore expected for all ten sites in relation to SA objective 5: **vibrant communities**. For strategic sites at South of Hardwicke (G1), the Hunts Groves Extension (PS30), Land at Whaddon (G2), Sharpness new settlement (PS36) and Wisloe new settlement (PS37) the positive effect is expected to be significant given that the development at these sites is to be delivered to incorporate a new local centre. For the remaining sites, minor positive effects are expected in relation to SA objective 5. For strategic sites at Stonehouse (PS19a and PS20), Cam (PS24 and PS25) and Hunts Grove (PS30), the minor positive effects have been identified due to the provision of community uses in their respective allocations. For, the Sharpness Docks strategic site (PS34), a minor positive effect has been identified as the site is on brownfield land and therefore offers potential for local regeneration.
- 5.44 Strategic site allocations PS24 (Cam North West), PS25 (Cam North East extension) and G2 (Land at Whaddon) are located adjacent to Tier 1 settlements or to Quedgeley and Gloucester. Strategic site allocation PS37 (new settlement at Wisloe) lies between Slimbridge (a tier 3b settlement) and Cam (a Tier 1 settlement). These locations are likely to provide residents with access to a wide range of existing services and facilities. The strategic sites at Whaddon (G2) and Wisloe (PS37) also include the delivery of a new local centre as part of development, which will improve resident's access to everyday needs. Whilst strategic site allocations PS19a and PS20 are not located directly adjacent to Stonehouse, they are adjacent to the West of Stonehouse site allocation which is set out in the adopted Local Plan and will form an extension of Stonehouse an

existing Tier 1 settlement. Strategic sites at South of Hardwicke (G1), and Sharpness new settlement (PS36) are only located at Tier 3 settlements, however, these sites would also incorporate new local centres with a range of uses which is likely to substantially improve access to services and facilities in the area. As such, significant positive effects are expected for these sites in relation to SA objective 6: **services and facilities**.

- 5.45 Strategic site Sharpness Docks (PS34) is also located at a Tier 3 settlement. As part of development of this site the delivery of new services and facilities is to be secured; however no new local centre or healthcare would be provided (although contributions to education should be provided). As such, a minor positive effect is expected for this site in relation to SA objective 6. Strategic site Hunts Grove extension (PS30) is expected to have a significant negative effect in relation to SA objective 6 as it is not adjacent to an existing Tier 1 to 4 settlement, which will limit the ability of residents to access services and facilities. It is recognised that the Hunts Grove Extension site (PS30) adjoins the committed Hunts Grove development area outlined in the adopted Local Plan for the Hunts Grove Extension. As set out in the adopted Local Plan and Settlement Role and Function Study Update 2018, Hunts Grove is anticipated to become a Tier 2 settlement, however, this will only be the case once development is completed. A new local centre is to be delivered as part of the Hunts Grove extension (PS30), and there a significant positive effects is identified in combination in relation to SA objective 6.
- 5.46 All of the strategic site allocations are expected to have negative effects in relation to SA objective 7: **biodiversity and geodiversity**. For strategic sites at South of Hardwicke (G1), Sharpness Docks (PS34) and Sharpness new settlement (PS36), the negative effects expected are significant. In the case of site G1, this is due to existing GI assets at the site that may be lost to development, and in the case of the latter two sites, this is due to their close proximity to the Severn Estuary SAC/SPA/Ramsar site and SSSI as well as GI assets within the site which could be lost to development. The remaining strategic sites are all expected to have minor negative effects as they lie within 1km of nationally designated sites, or within 250m of local designated sites. However, all of the strategic site allocations include the retention of key hedgerows and trees as part of development and/or biodiversity net gains through areas of green space and therefore positive effects in relation to SA objective 7 are also expected for all sites as part of a mixed overall effects. In the case of the Sharpness new settlement strategic site (PS36), the positive effects are likely to be significant as the site will deliver green infrastructure (including SANG) with biodiversity net gains, mitigation of impacts to Severn Estuary SAC/SPA/Ramsar site both on and off site and a provision of a new managed nature reserve.
- 5.47 The HRA work undertaken for the plan<sup>63</sup> screened in all individual site allocations for likely significant effects in combination in relation to water issues for the Severn Estuary SAC/SPA/Ramsar site and air quality for the Cotswolds Beechwoods SAC. Likely significant recreation effects were also identified in combination for a number of the strategic housing and mixed use site allocations with regards to Cotswolds Beechwoods SAC (sites G1, G2, PS19a, PS24, PS30 and PS37) and the Severn Estuary SAC/SPA/Ramsar site (sites G1, PS19a, PS24, PS30, PS34, PS36 and PS37). The screening work also identified the potential for significant urban and recreation effects alone relating to the Severn Estuary SAC/SPA/Ramsar site with regards to sites PS34 and PS36.
- 5.48 The appropriate assessment addresses the significant effects identified in relation to water issues for the Severn Estuary SAC/SPA/Ramsar site. Wastewater issues are to be resolved as part of project level HRA for seven strategic sites (PS19a, PS20, PS24, PS32, G1, G2 and PS36) and the plan contains policy wording for these wastewater requirements. With regards to significant effects relating to air quality, the appropriate assessment also concluded that traffic increases and air quality impacts could be ruled out for Rodborough Common SAC alone and there is no need for an assessment of in-combination effects. The relatively low levels of traffic forecast for the Local Plan Review means that adverse effects on integrity relating to air quality for Cotswolds Beechwoods SAC can also be ruled out from the Local Plan alone. Traffic modelling incorporating committed development from adjacent authorities indicates that traffic flows will be relatively low and therefore in-combination adverse effects on integrity of Cotswolds Beechwoods SAC have also been ruled out. However, this in-combination assessment work does not include growth in

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<sup>63</sup> Footprint Ecology on behalf of Stroud District Council (2021) *Habitats Regulations Assessment of the Stroud District Local Plan Review Pre-submission Draft Plan*

the Joint Core Strategy (JCS) review, which is at a very early stage and as this review progresses, there may be adverse effects in-combination. The HRA highlights that appropriate mitigation measures relating to recreation are set out through the strategic approaches currently in place relating to recreation pressures on the Rodborough Common SAC<sup>64</sup> and the Severn Estuary SAC/SPA/Ramsar<sup>65</sup> and that the plan also references the draft strategy for the Cotswolds Beechwoods SAC<sup>66</sup>. Some uncertainty exists relating to the effects of sites on the Rodborough Common and Severn Estuary designations given that the HRA states that adopted strategies require updating to ensure they will deliver sufficient mitigation to address the scale of growth in the plan. However, adverse effects on integrity, alone or in combination are ruled out with a view to this being done.

- 5.49 Through the appropriate assessment, urban effects (covering effects relating to light, noise, cat predation, fly tipping, spread of invasive species and vandalism) were also ruled out considering the policy wording contained in the Pre-submission Draft Local Plan and specifically that for the development of allocations PS34 and PS36. For these sites, site design and construction requirements set out through the site allocation policies are of particular importance to prevent impacts on the integrity of the Severn Estuary SAC/SPA/Ramsar site. The appropriate assessment also ruled out the potential for significant effects relating to loss of supporting habitat/functionally-linked land for the Severn Estuary SAC/SPA/Ramsar site with regards to these two sites. Mitigation measures embedded within the plan were identified to address the scale of risk at each location. These measures are to be resolved through site design and project level HRA.
- 5.50 Effects relating to biodiversity are uncertain depending on the detailed proposals that eventually come forward at each site and the types of habitats and species present at the nature conservation sites. In addition, mitigation of potentially significant effects relating to biodiversity is provided by requirements in other policy approaches in the Local Plan Review.
- 5.51 The majority of the sites are expected to have negative effects in relation to SA objective 8: **landscapes/townscapes**. For strategic site allocations at the Eco Park M5 Junction 13, Stonehouse (PS20), the Sharpness new settlement (PS36) and Land at Whaddon (G2), the negative effects are likely to be significant as they contain land which has been assessed as having medium-high sensitivity to residential development through the Landscape Sensitivity Assessment undertaken for Stroud or the landscape sensitivity assessment undertaken as part of the Gloucestershire Strategic Development Opportunities work. Minor negative effects are expected for six of the strategic allocations at Stonehouse North West (PS19a), Cam North West (PS24), Cam North East extension (PS25), South of Hardwicke (G1), Sharpness Docks (PS34) and Wisloe new settlement (PS37) as they are located in areas that have low-medium or medium landscape sensitivity to development. All of the aforementioned sites are also expected to have positive effects in relation to SA objective 8 given the requirement through the site allocation policies for the incorporation of structural landscaping buffers and/or incorporation of new native hedgerows and trees included as part of development. Many of the site allocation policies for these sites also include specific reference for the need for development to be delivered in a manner which will protect the existing landscape setting. For the Hunts Grove Extension strategic site, an uncertain effect is recorded in relation to SA objective 8. This site is not covered by the Landscape Sensitivity Assessment or the landscape sensitivity assessment undertaken as part of the Gloucestershire Strategic Development Opportunities work.
- 5.52 Heritage impact assessment work has been undertaken as part of the SALA for Stroud. The work identified potential heritage constraints and the potential for development to impact on elements of the historic environment. It also concluded that opportunities may exist to achieve benefits in relation to the historic environment at the Sharpness Docks strategic site (PS34) and therefore a minor positive effect is expected for this site in relation SA objective 9: **historic environment**. However, a significant negative effect is also expected for this site as it scored 4 in the SALA heritage assessment. Significant negative effects are also expected in relation to SA objective 8

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<sup>64</sup> Stroud District Council (2015) *Interim Strategy for Avoidance of Likely Significant Adverse Effects on Rodborough Common Special Area of Conservation (SAC)*

<sup>65</sup> Stroud District Council (2017) *Strategy for Avoidance of Likely Significant Adverse Effects on the Severn Estuary SAC, SPA and Ramsar Site*

<sup>66</sup> Footprint Ecology on behalf of Stroud District Council (2021) *Cotswold Beechwoods SAC Recreation Mitigation Strategy*

for the strategic sites at South of Hardwicke (G1) and the Eco Park M5 junction 13, Stonehouse site (PS20) as they both scored 3 in the SALA heritage assessment. Minor negative effects are expected for the Land at Whaddon site (G2) and the Sharpness new settlement site (PS36) as they scored 2 in the SALA heritage assessment. Apart from the strategic site at South of Hardwicke (G1), minor positive effects are also expected as part of an overall mixed effect for the aforementioned sites. This is due to mitigation measures set out in their respective strategic site allocation policies concerning local historical context. Five of the strategic sites (PS19a, PS24, PS25, PS30 and PS37) were screened out of the SALA heritage assessment as having no heritage impacts. The new settlement at Wisloe (PS37) is expected to have a minor positive effect as the development layout is required to respond to the heritage context within the Berkeley Vale.

- 5.53 The SALA Transport Assessment rated the accessibility of residential sites by walking, car and bus in the District to town/district/local centres, employment sites and services and facilities that people may be required to access on a regular basis. The findings of this assessment work have informed the sustainability effects identified in relation to SA objective 10: **air quality**. A lower SALA score indicates lower likely overall emissions from traffic, and therefore more positive effects in terms of this SA objective. Five of the strategic sites at Stonehouse North West (PS19a), Cam North West (PS24), Land at Whaddon (G2), Sharpness Docks (PS34) and Wisloe new settlement (PS37) contain areas that scored over 80 in the SALA transport assessment and therefore significant negative effects are expected for these sites in relation to SA objective 10. Phase 2 of the new settlement at Sharpness (PS36) contains an area which scored over 80 in the assessment, however, effects relating to this part of the development would occur beyond the plan period. Three of the strategic sites at Hunts Grove Extension (PS30), phase 1 of the new settlement at Sharpness (PS36) and South of Hardwicke (G1) scored between 70-80 in the SALA transport assessment and therefore minor negative effects are expected for these sites in relation to SA objective 10. For all of these strategic sites, positive effects are also expected as part of an overall mixed effect due to sustainable transport measures outlined in their respective allocation policies. For strategic sites at Stonehouse North West (PS19a), Land at Whaddon (G2), Hunts Grove Extension (PS30), Sharpness new settlement (PS36) and Wisloe new settlement (PS37) the positive effects are likely to be significant as development will include prioritisation of walking and cycling and delivery of new walking and cycling routes, EV vehicle charging points, improved bus connections and, in the case of sites PS19a, PS30 and PS36, contributions to enhanced rail services.
- 5.54 The Cam North East extension (PS25) is assessed as containing land which scored between 50-60 and 60-70 through the SALA Transport Assessment and therefore a negligible effect was recorded without considering mitigation to be provided at the site. Given that the site is to be delivered to include activity transport improvements and enhancements of passenger facilities at Cam and Dursley station, the effect is upgraded to a minor positive. One strategic site at Stonehouse, Eco Park M5 Junction 13 (PS20) was not included in the SALA transport assessment as it is allocated for mostly employment and associated uses. However, significant positive effects are expected for this site in relation to SA objective 10 due to its proximity to bus stops and cycle routes and also through the proposed delivery of new walking and cycling routes, improved bus services and the re-opening of the Stonehouse Bristol Road rail station.
- 5.55 Five of the strategic site allocations at Stonehouse (PS19a and PS20), Cam North West (PS24), Cam North West Extension (PS25) and Wisloe new settlement (PS37) fall within Drinking Water Safeguarding Zone where development may impact on the water quality of the District. For these sites a significant negative effect is expected in relation to SA objective 11: **water quality**. Given that all ten of the Strategic Site Allocation policies require that infrastructure is incorporated to tackle wastewater generated by the development, a minor positive effect is recorded in combination for these five sites. The remaining five sites are expected to have minor positive effects alone, considering the requirements of the policies which address development at each location.
- 5.56 The majority (nine) of the strategic site allocations lie on mostly greenfield land. The development of these sites would increase the area of impermeable surfaces in the plan area and reduce the areas in which surface water could safely infiltrate. Of these sites, those that are mostly free of areas of higher flood risk (PS19a, at Stonehouse; PS24, Cam North West; PS25, Cam North East Extension; PS30, Hunts Grove Extension; and PS37, Wisloe new settlement) are expected to have a minor negative effect in relation to SA objective 12: **flooding**. The four

remaining sites which lie on greenfield land (PS20, at Stonehouse; G1, South of Hardwicke; G2, at Whaddon; and PS36, Sharpness new settlement) contain areas of flood zone 3a or 3b. The Sharpness Dock strategic site allocation (PS34) is brownfield land but also contains areas of flood zone 3a or 3b. Development at these locations could result in new homes, businesses and infrastructure being at high risk of flooding from fluvial sources. A significant negative effect is recorded for these sites in relation to SA objective 12. Given that the Site Allocation Policies for all sites require the incorporation of measures to address flood risk, including acceptable management and disposal of surface water, through the incorporation of SuDS, a minor positive effect is expected in combination for all sites.

- 5.57 Nine of the ten strategic site allocations take in large areas of greenfield land. Many of the sites also incorporate areas of land which are of Grade 3 agricultural quality or higher. Therefore, significant negative effects have been recorded for these sites in relation to SA objective 13: **efficient land use**. For one of these sites (PS25, Cam North East Extension) the significant negative effect is uncertain. This site is relatively small in size (it would deliver less than 600 homes) and is on Grade 3 agricultural land. It is unknown if the site contains Grade 3 or Grade 3b agricultural soils. The other sites for which a significant negative effect has been recorded are comparatively larger in size. Given the larger area of greenfield land take required at these sites, no uncertainty is attached to the significant negative effect recorded in relation to SA objective 13. Only the Sharpness Dock site (PS34) is expected to have a minor positive effect in relation to this SA objective. This site is relatively small in size (providing less than 600 homes) but contains substantial portions of brownfield land. Its development would support the prioritisation of developing on previously developed land in the District.
- 5.58 Most of the strategic site allocations are expected to have a negligible effect in relation to SA objective 14: **climate change**. Minor positive effects have been recorded for only three strategic sites (PS20, Eco Park M5 Junction 13 by Stonehouse; PS36, the new settlement at Sharpness; and PS37, the new settlement at Wisloe). The Strategic Allocation Policy for the Eco Park at the Junction 13 of the M5 allocates land for business uses which are associated with the green technology and low carbon sector. This allocation may help to facilitate a shift in the District's economic growth to include a higher proportion of businesses focussed on green technologies. The Strategic Allocation Policies for the new settlement sites require the incorporation of zero carbon energy generation to meet the needs of the community. This may include small wind turbines, solar farms and biomass production which could help to limit the demand for electricity and heat from fossil fuel based sources in the District. The remaining seven strategic sites do not include similar requirements. While other sites are required by the Strategic Allocation Policies to be developed to include sustainable transport measures which could help to reduce greenhouse gas emissions associated with travel, this has been addressed separately through SA objective 10: air quality.
- 5.59 The majority of the strategic site allocations are also expected to have a negligible effect in relation to SA objective 15: **waste**. These sites lie on mostly greenfield land and their development would provide limited opportunities to support the re-use of existing buildings or construction materials which might be present at brownfield sites. The exception to this is the Sharpness Dock site (PS34) which contains substantial areas of previously developed land and for which a minor positive effect is expected.
- 5.60 The strategic site allocations are all expected to have a positive effect in relation to SA objective 16: **employment**. The positive effect is expected to be significant for the sites at Stonehouse (PS19a and PS20), Cam North West (PS24) and Cam North West Extension (PS25) and also for the new settlement at Sharpness (PS36). The significant positive effect for sites PS19a and PS36 reflects the large amount of employment land to be provided at these sites given that at least 10ha of employment uses are to be delivered. For site PS20 at Stonehouse as well as sites PS24 and PS25 at Cam the significant positive effect reflects the close proximity of the sites in question to existing key employment sites as well as a Tier 1 settlement at which existing employment opportunities are likely to be available. A minor positive effect is expected for the remaining five strategic site allocations (PS30, Hunts Grove Extension; G1, south of Hardwicke; G2, at Whaddon; PS34, at Sharpness Dock; and PS37, Wisloe). These are sites which would provide an amount of employment land which less than 10ha or are within close proximity of an existing key employment site but not a Tier 1 or 2 settlement.

- 5.61 All of the strategic site allocations are also expected to have a positive effect in relation to SA objective 17: **economic growth**. For the strategic sites at Stonehouse (PS19a and PS20), south of Hardwicke (G1) and Whaddon (G2), and the new settlements at Sharpness (PS36) and Wisloe (PS37) the positive effect is expected to be significant. For all of these sites, apart from the new settlement at Wisloe, at least 10ha of employment land and new school facilities would be delivered. This is likely to support economic growth and educational attainment in the plan area. The level of employment land provided at Wisloe would only be 5ha; however the site would provide a new primary school onsite and contributions towards secondary school and further education provision would also be required. For the site at Whaddon the significant positive effect is likely to be combined with a minor negative effect. While this site is to deliver two primary schools onsite and the developer will be required to make contributions towards the provision of a secondary school, the site is not close to an existing school facilities meaning earlier occupiers of the site could have limited access to these types of facility.
- 5.62 Strategic sites Cam North West (PS24) and Hunts Grove Extension (PS30) would not deliver any new employment land and are not close to existing school facilities. Given that both sites would include the delivery of a new primary school, a minor positive effect is recorded in combination with the minor negative effect expected. Site PS24 at Cam would also secure contributions to secondary school and further education provision. A minor positive effect alone is expected for the remaining sites at Cam (PS25) and Sharpness Docks (PS34). The Cam North West site is in close proximity to a primary school but not secondary school while the site allocation policy requires contributions to education but no provision onsite. The Sharpness Docks site would provide 7ha of employment land, is close to only a primary school but not a secondary school. Furthermore, development of site is required to be supported by contributions to education, but no provision of education facilities is required to be made onsite.



**Table 5.4 Summary of likely sustainability effects of strategic site allocations**

SA Objectives	SA 1: Housing	SA 2: Health	SA 3: Social inclusion	SA 4: Crime	SA 5: Vibrant communities	SA 6: Services and facilities	SA 7: Biodiversity/geodiversity	SA 8: Landscapes/townscapes	SA 9: Historic environment	SA 10: Air quality.	SA 11: Water quality	SA 12: Flooding	SA 13: Efficient land use	SA 14: Climate change	SA 15: Waste	SA 16: Employment	SA 17: Economic growth
<b>Stonehouse</b>																	
PS19a	++	++/-	0	0	+	++	+/-?	+/-?	0	++/--	+/--?	+/-	--	0	0	++	++
PS20	+	++/--?	0	0	+	++	+/-?	+/--?	+/--	++	+/--?	+/--	--	+	0	++	++
<b>Cam</b>																	
PS24	++	++/-	0	0	+	++	+/-?	+/-?	0	--/+	+/--?	+/-	--	0	0	++	+/-?
PS25	+	++/-	0	0	+	++	+/-?	+/-?	0	+	+/--?	+/-	--?	0	0	++	+
<b>Hunts Grove</b>																	
PS30	++	-/+	0	0	++	++/--	+/-?	?	0	++/-	+	+/-	--	0	0	+	+/-?
<b>Hardwicke</b>																	
G1	++	++/--?	0	0	++	++	+/--?	+/-?	--	+/-	+	+/--	--	0	0	+	++?
<b>Whaddon</b>																	
G2	++	++/-	0	0	++	++	+/-?	+/--?	+/-	++/--	+	+/--	--	0	0	+	++/-?
<b>Newtown &amp; Sharpness</b>																	
PS34	+	++/--?	0	0	+	+	+/--?	+/-?	+/--?	+/--	+	+/--	+	0	+	+	+
PS36	++	++/--?	0	0	++	++	++/--?	+/--?	+/-	+/--	+	+/--	--	+	0	++	++?
<b>Wisloe</b>																	
PS37	++	++/-	0	0	++	++	+/-?	+/-?	+	++/--	+/--?	+/-	--	+	0	+	++

## Considering the potential effects of development on individual settlements in the plan area

- 5.63 The appraisal findings of the individual sites allocated for development in the Pre-submission Draft Local Plan described above identify where potential adverse effects may result in terms of sensitive environmental receptors (including biodiversity/geodiversity, landscape character, heritage, water quality and air quality). The findings described above also consider the potential for new residents to benefit from nearby access to services and facilities and employment opportunities, and describe the effects relating to housing delivery for the District as a whole.
- 5.64 However, the appraisal of the individual site allocations described above does not consider effects relating to individual settlements in the plan area in terms of helping to ensure the viability of the settlement itself by allowing for an appropriate level of development and population 'turnover', which can support regeneration and service provision to benefit local people. This analysis was identified as a gap by one of the consultation responses on the SA Report for the Draft Plan (November 2019). The following paragraphs therefore consider this issue from a sustainability appraisal perspective, drawing heavily on the Council's Settlement Role and Function Study<sup>67</sup>. This study highlights that the high numbers of older people moving to Stroud has the potential to result in greater 'polarisation' between those settlements with large working-age populations and high levels of economic activity, and those with fast-ageing populations, low levels of economic activity and a high proportion of retirees. The allocation of development sites as part of the growth strategy for the District can play a role in ensuring that settlements remain vibrant and diverse. To respond positively to this, the Local Plan strategy seeks to focus growth at the District's larger and better-resourced settlements with tailored development in settlements where the community's diversity and vitality may be under pressure<sup>68</sup>.
- 5.65 In the Pre-submission Draft Local Plan, all Tier 1 settlements will accommodate some level of development, with much of this directed towards the strategic sites at Cam and Dursley and Stonehouse. A lesser amount of development is to be provided at Stroud given its physical and environmental constraints within the Stroud Valley, at the edge of the AONB and with Rodborough Common SAC to the south. The majority of the Tier 2 settlements are also to accommodate some level of development which is not of a strategic scale. The exception to this is Wotton under Edge at which no new housing development is allocated given its presence within the AONB and its environmental sensitivities (although housing and employment sites are allocated in close proximity by Kingswood). Hunts Grove is to accommodate a strategic scale of growth. The level of development (which is to include a new local centre) here will result in the settlement having sufficient services and facilities to function as a Tier 2 settlement in the Gloucester fringe. Although this area is well-related to Gloucester city, it does not currently benefit from a settlement of this size which can provide access to a range of services and facilities.
- 5.66 Smaller scale development is allocated at many of the Tier 3a settlements. At Whitminster, Eastington and Newtown there are below-average proportions of children making up the settlements' populations and there is potential for some benefits to be achieved by providing development which is targeted and scaled to maintain diversity and demographic vitality, including a range of housing types. Development provided in this way is likely to help sustain these settlements schools' local catchments. These three settlements are identified as having a proportion of working age adults that at least matches the District average, which may give them some advantage in terms of sustaining other services and facilities, even if new development is not delivered.
- 5.67 The sites allocated in the Pre-submission Draft Local Plan include some limited development at Whitminster and Newtown to help address these issues. It is expected that housing delivery policies in the Pre-submission Draft Local Plan will help to ensure that housing development sites deliver a range of different types, tenures and sizes of housing, to support the creation of mixed

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<sup>67</sup> Stroud District Council (2019) *Settlement Role and Function Study Update 2018*

<sup>68</sup> Stroud District Council (2019) *Settlement Role and Function Study Update 2018*

communities in the plan area. However, no new development is to be provided at Eastington. Strategic development to the north at the Stonehouse M5 Junction 13 Eco Park (within 600m at the closest point) could provide some benefits in terms of access to services, employment and sustainable transport; however, the new homes to be provided here are to form a new care village. It is unlikely that this type of development will help to address the issue of the increasing average age in the area. The development strategy for the Stonehouse parish cluster highlights that development will be supported at Eastington (if proposals come forward) to sustain or enhance its role and function as an accessible settlement with local facilities, which may help to sustain the local school catchment.

- 5.68 Other settlements which are identified as being vulnerable in terms of ageing population and socio-economic trends in the Settlement Role and Function Study include the Tier 2 settlements Minchinhampton and Painswick, as well as Tier 3a and Tier 3b settlements North Woodchester, Amberley, Bisley, Oakridge Lynch, North Nibley, Coaley and Uley. Minchinhampton and Painswick are highly constrained given their presence within the AONB and proximity to Minchinhampton Common SSSI and Rodborough Common SAC Cotswold Beechwoods SAC, respectively. The Pre-submission Draft Local Plan allocates a tailored level of housing development at these settlements which will help to sustain and improve existing services and facilities and address the issues highlighted. The sites allocated at Minchinhampton and Painswick are included in the Pre-submission Draft Local Plan to address local housing needs within the AONB and the site at Minchinhampton will also incorporate new community uses.
- 5.69 At the Tier 3a and Tier 3b settlements listed above no further development is allocated in the plan. These are mid-sized settlements and although no sites are allocated through the plan, the development strategies for the District's parish clusters highlight that development is to be supported at these locations (if proposals come forward) to sustain their roles to provide local services and facilities.

## Further consideration for pressures on education facilities in Stroud

- 5.70 Due to the sensitivity of data relating to schools' capacities it has not been possible to consider this issue in relation to individual draft site allocations included in the Pre-submission Draft Local Plan. However, the findings of Gloucestershire County Council's School Places Strategy<sup>69</sup> provide an overview of areas in the District at which capacity issues for primary and secondary schools may result as new development is delivered. The strategy identifies that the large amount of development to be delivered at the new settlements in the District could have capacity impacts relating to the areas surrounding Stonehouse and Berkeley. It is, however, identified that the level of growth to be provided at each location would be enough to support new education facilities. Within the wider Stonehouse area, facilities at Eastington, Kings Stanley and Leonard Stanley are likely to look to create some additional capacity to accommodate the additional pupils in the near future. In the area around Dursley there is sufficient supply to meet demand and a surplus of primary places remains; however Uley and Coaley are geographically isolated and therefore could be under pressure from local demand, reflecting issues of education provision in a rural community.
- 5.71 Across the County monitoring of new housing delivery is to continue and S106 contributions will be sought by the County Council if appropriate. At Eastcombe in the medium term (3 to 5 years) S106 provision is to be monitored at Brimscombe Port with some expansion at local schools potentially required. Within the area surrounding Stroud, Cainscross, Painswick and Stonehouse there is a requirement in the long term (5 to 10 years) to monitor secondary school capacity with potential for low level demand for additional places. The County Council has also identified that in the areas surrounding Dursley and Wotton-under-Edge there will be a medium term need to monitor demand for secondary places with the potential need for bulge classes for 2021 (the strategy also includes the potential need for bulge classes in 2019). In the Wotton-under-Edge area, new housing developments local to Kingswood Primary School should be monitored as there are short term capacity issues due to this school's site restrictions. There is likely to be a requirement to continue to hold discussions with developers to inform how they will make

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<sup>69</sup> Gloucestershire County Council (2018) *School Places Strategy 2018-2023*

provision available locally. There may be primary school capacity within the wider planning area, at Wotton-under-Edge, however, this would require parents and children to travel out of Kingswood village for primary education.

- 5.72 In all it is expected that continued County Council monitoring and contributions sought through S106 will help to address any capacity issues which might emerge. The level of development in the Stroud area will mean that demand is expected to fill surplus capacity in local primary schools. There is sufficient capacity in the District to accommodate the likely demand for secondary school places from housing in most cases, although there will be small pockets of additional need. The most notable increases in educational demand are likely to occur at the new settlements at Sharpness and Wisloe, however, the amount of growth supported will allow for the delivery of new facilities to help meet this demand. The site allocation policies for both sites require the incorporation of a new primary school as part of development and contributions towards secondary school provision.

## 6 Cumulative effects of Stroud District Plan Review – Pre-submission Draft Local Plan

- 6.1 **Table 6.1** below presents a summary of all the potential sustainability effects identified for the Stroud District Plan Review – Pre-submission Draft Local Plan. From this summary it is possible to assess the likely significant effects of the Pre-submission Draft Local Plan as a whole (including the site allocations) in relation to each of the SA objectives. This enables a description of the likely cumulative effects of the plan as required by the SEA Regulations, which is presented below **Table 6.1**.
- 6.2 **Table 6.2** provides a summary of the likely cumulative effect of the Pre-submission Draft Local Plan for each SA objective.

**Table 6.1 Summary of cumulative effects of Stroud Pre-submission Draft Local Plan**

SA Objectives	SA 1: Housing	SA 2: Health	SA 3: Social inclusion	SA 4: Crime	SA 5: Vibrant communities	SA 6: Services and facilities	SA 7: Biodiversity/geodiversity	SA 8: Landscapes/townscapes	SA 9: Historic environment	SA 10: Air quality.	SA 11: Water quality	SA 12: Flooding	SA 13: Efficient land use	SA 14: Climate change	SA 15: Waste	SA 16: Employment	SA 17: Economic growth
Key priorities	++/-?	+	+	0	+	++	++	??	??	++	0	+	++	++	??	++/-?	++/-?
Vision for the District	0	+	+	+	+	+	+	+	+	+	+	0	0	+	+	+	+
<i>Strategic Objectives</i> SO1	++	++	++	0	0	++	0	0	0	0	0	0	0	0	0	0	+
SO1a	0	++	++	++	0	0	0	0	0	0	0	0	0	0	0	0	0
SO2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	++
SO3	0	0	0	+	0	++	0	0	0	0	0	0	0	0	0	+	+
SO4	0	+	0	0	0	+	0	0	0	+	0	0	0	++	0	0	0
SO5	0	+	0	0	0	0	+	0	0	+	++	++	++	++	++	0	0
SO6	0	0	0	0	0	0	++	++	++	0	0	0	0	0	0	0	0
<b>Place Making: the development strategy</b>																	
DCP1	+	+	0	0	+	+	++	+	0	++	+	+	0	++	+	0	0
CP2	++	++/-	+/-	0	+/-	++/-	--?	--?	+?/--?	+/-	-	+/--	+/--	+/-	+	++/-	++/-
CP3	++	++	+	0	+/-	++/-	--?	+/-?	+/-?	+	-	-	+	+	+	++/-	++/-
CP4	+	+	0	+	++	0	+	+	+	+	0	0	0	+	+	+	0
CP5	0	+	0	0	+	+	+	+	+	+	+	+	0	++	+	0	0

SA Objectives	SA 1: Housing	SA 2: Health	SA 3: Social inclusion	SA 4: Crime	SA 5: Vibrant communities	SA 6: Services and facilities	SA 7: Biodiversity/geodiversity	SA 8: Landscapes/townscapes	SA 9: Historic environment	SA 10: Air quality.	SA 11: Water quality	SA 12: Flooding	SA 13: Efficient land use	SA 14: Climate change	SA 15: Waste	SA 16: Employment	SA 17: Economic growth
CP6	0	+	0	0	+	+	0	0	0	+/-	0	0	0	+/-	0	0	+
<b>Making Places: Shaping the future of Stroud District</b>																	
Vision for the Stroud Valleys	+	+	+	0	+	+	+	+	+	+	0	0	0	+	0	+	+
Site PS01	+	-/++	0	0	+	+	+/-?	-?	+/--?	0	--?	+/--	+	0	+?	+	+?
Site PS02	+	++/--?	0	0	+	+	+/--?	-?	+/--?	0	--?	+/--	+	0	+?	+?	+?
Site PS05	+	++	0	0	+	+	+/-?	+/--?	+/--?	0	--?	+/-	--?	0	0	+	+
Site PS05a	+	++	0	0	0	+	-?	--?	--	0	--?	-	--?	0	0	+	+
Site PS06	+	++/--?	0	0	+	+	+/-?	+/-?	0	0	--?	0	+	0	+?	+	+?
Site PS10	+	++	0	0	+	++	-?	-?	+/--?	++	--?	0	+	0	+?	+	+?
Site PS11	+	++	0	0	+	++	-?	-?	+/--?	++	--?	0	+	0	+?	+	+?
Site PS12	+	++	0	0	+	++	-?	-?	+/-?	++	--?	0	+	0	+?	++/--	+?
STR065	+	++	0	0	+	++	-?	-?	0/+?	++	--?	0	+	0	+?	++	+?
Vision for the Stonehouse cluster	+	+	0	0	+	+	+	+	0	+	0	0	0	+	0	+	+
Site PS16	+	-/++	0	0	0	+	-?	+/-?	0	0	--?	-	--?	0	0	-	+?
Site PS17	+	+/--?	0	0	+	++	-?	-?	0	+	--?	0	+	0	+?	++	+++?
Site PS19a	++	++/-	0	0	+	++	+/-?	+/-?	0	++/--	+/--?	+/-	--?	0	0	++	++

SA Objectives	SA 1: Housing	SA 2: Health	SA 3: Social inclusion	SA 4: Crime	SA 5: Vibrant communities	SA 6: Services and facilities	SA 7: Biodiversity/geodiversity	SA 8: Landscapes/townscapes	SA 9: Historic environment	SA 10: Air quality.	SA 11: Water quality	SA 12: Flooding	SA 13: Efficient land use	SA 14: Climate change	SA 15: Waste	SA 16: Employment	SA 17: Economic growth
Site PS20	+	++/--?	0	0	+	++	+/-?	+/-?	+/-	++	+/-?	+/-	--	0	0	++	++
Site PS42	+	++/-	0	0	0	+	0?	+/-?	0	0	--?	-	--?	0	0	--	+?
Vision for Cam and Dursley	+	+	+	0	+	+	+	+	+	+	0	0	0	+	0	+	+
Site PS24	++	++/-	0	0	+	++	+/-?	+/-?	0	+/-	+/-?	+/-	--	0	0	++	+/-?
Site PS25	+	++/-	0	0	+	++	+/-?	+/-?	0	+	+/-?	+/-	--?	0	0	++	+?
Site PS27	0	++	0	0	+	++	+/-?	+/-?	+/-?	+	--?	0	+	0	+?	+	+
Site PS28	+	++	0	0	+	++	+/-?	+/-?	+/-	++	--?	0	+	0	+?	++	+?
Vision for Gloucester's rural fringe	+	0	+	0	+	+	0	+	+	+	0	0	+	+	+	+	+
Site HAR017	+	++/-	0	0	0	+	-?	+/-?	+/-	+	0	+/-	--?	0	0	--	+?
Site PS30	++	++/-	0	0	++	++/--	+/-?	?	0	++/-	+	+/-	--	0	0	+	+/-?
Site PS32	0	+	0	0	0	0	0?	+/-?	0	+	0	-	--?	0	0	+	+
Site PS43	0	+	0	0	0	0	0?	+/-?	0	+	0	-	--	0	0	++	++
Site G1	++	++/--?	0	0	++	++	+/-?	+/-?	--	+/-	+	+/-	--	0	0	+	+++
Site G2	++	++/-	0	0	++	++	+/-?	+/-?	+/-	++/--	+	+/-	--	0	0	+	++/--?
Vision for the Berkeley Cluster	+	+	+	0	+	+	+	+	+	+	0	+	0	+	0	+	+
BER016/17	+	++	0	0	0	+	-?	+/-?	0	0	0	+/-	--?	0	0	+	+?



SA Objectives	SA 1: Housing	SA 2: Health	SA 3: Social inclusion	SA 4: Crime	SA 5: Vibrant communities	SA 6: Services and facilities	SA 7: Biodiversity/geodiversity	SA 8: Landscapes/townscapes	SA 9: Historic environment	SA 10: Air quality.	SA 11: Water quality	SA 12: Flooding	SA 13: Efficient land use	SA 14: Climate change	SA 15: Waste	SA 16: Employment	SA 17: Economic growth
Site PS33	+	++	0	0	0	+	+/-?	+/-?	0	+	0	+/--	--?	0	0	++	+?
Site PS34	+	++/--?	0	0	+	+	+/--?	+/-?	+/--?	+/--	+	+/--	+	0	+?	+	+?
Site PS35	+	++/-	0	0	+	+/--	-?	-?	0	-	0	0	+	0	+?	--	+?
Site PS36	++	++/--?	0	0	++	++	++/--?	+/--?	+/-	+/--	+	+/--	--?	+?	0	++	+++?
Site PS37	++	++/-	0	0	++	++	+/-?	+/-?	+	++/--	+/--?	+/-	--	+	0	+	++
Vision for the Severn Vale	0	+	0	0	0	+	+	+	+	+	0	+	0	+	0	0	+
Site PS44	+	++	0	0	0	+	-?	+/-?	-	-	0	-	--	0	0	+	+?
Site PS45	+	++/-	0	0	0	+	+/-?	+/-?	+/-	-	--?	-	--?	0	0	--	+?
Site PS46	+	++/-	0	0	0	+	-?	+/-?	0	-	--?	-	--?	0	0	--	+?
Vision for the Wotton Cluster	0	0	+	0	+	+	0	+	+	+	0	0	0	+	0	+	+
Site PS38	+	++/-	0	0	0	+	+/-?	+/-?	0	-	0	-	--?	0	0	+	+?
Site PS47	0	+	0	0	0	0	0?	+/--?	+/--	+	0	+/-	--?	0	0	++	++
Vision for the Cotswold Cluster	+	0	+	0	+	+	0	+	+	0	0	0	0	0	0	+	+
Site PS41	+	++	0	0	0	+	-?	+/--?	+	0	--?	-	--?	0	0	+	+?
<b>Homes and Communities</b>																	
CP7	++	+	++	0	+	+	0	0	0	+	0	0	0	+	0	0	0
DCP2	++	++	++	0	+	+	0	0	0	0	0	0	0	0	0	0	0

SA Objectives	SA 1: Housing	SA 2: Health	SA 3: Social inclusion	SA 4: Crime	SA 5: Vibrant communities	SA 6: Services and facilities	SA 7: Biodiversity/geodiversity	SA 8: Landscapes/townscapes	SA 9: Historic environment	SA 10: Air quality.	SA 11: Water quality	SA 12: Flooding	SA 13: Efficient land use	SA 14: Climate change	SA 15: Waste	SA 16: Employment	SA 17: Economic growth
CP8	++	+	+	0	+	+	+	+	+	+	0	0	0	+	0	0	+
CP9	++	0	+	0	+	+	+	+	+	0	0	0	0	0	0	0	0
CP10	++	0	+	0	+	+	0	0	0	0	0	+	0	0	+	0	0
DHC1	++	+/-	0	0	+	+/-	0	0	0	+/-	0	0	0	+/-	0	+/-	0
DHC2	++	-	+	0	+	+/-	0	+/-?	0	-	0	0	-	-	0	0	0
HC2	+	+	0	0	+	+	0	0	0	+	0	0	+	+	0	+	+
HC3	++	0	+	0	0	+	0	-?	0	0	0	0	0	0	0	0	0
HC4	++	+/-	+	0	+	+/-	0	-?	-?	+/-	0	0	-	+/-	0	+/-	0
DHC3	+	+	0	0	0	+	0	0	0	+	0	0	0	+	0	+	+
HC1	++	+	0	0	+	0	+	+	+	+/-?	0	0	0	+/-?	0	0	0
DHC4	++	+	+	0	+	+	+	0	0	0	0	0	0	+	0	0	0
HC5	+	0	0	0	0	0	0	+	+	0	0	0	0	+	0	0	0
HC6	+	+/-	0	0	+	+	0	+	+	+/-	0	0	+	+/-	+	+	0
HC7	+	+	+	0	+	0	0	0	0	0	0	0	+	0	0	0	0
HC8	+	0	0	0	+	0	0	+	+	0	0	+	0	+	0	0	0
DHC5	0	++	+	0	+	+	+	0	0	+	0	0	0	+	0	0	0
DHC6	0	++	0	0	+	+	+	+	+	0	0	+	+	0	0	0	0
DHC7	0	++	0	0	+	+	+	+	0	+	0	+	0	+	0	0	0

SA Objectives	SA 1: Housing	SA 2: Health	SA 3: Social inclusion	SA 4: Crime	SA 5: Vibrant communities	SA 6: Services and facilities	SA 7: Biodiversity/geodiversity	SA 8: Landscapes/townscapes	SA 9: Historic environment	SA 10: Air quality.	SA 11: Water quality	SA 12: Flooding	SA 13: Efficient land use	SA 14: Climate change	SA 15: Waste	SA 16: Employment	SA 17: Economic growth
<b>Economy and Infrastructure</b>																	
CP11	+?	0	0	0	0	0	+	+	+	+/-	0	+	+/-	+/-	0	++	++
CP12	+	+	+	0	+	++	0	0	0	+	0	0	0	+	0	+	+
CP13	0	+	+	0	+	+	0	0	0	++/-	0	0	0	++/-	0	+	+
EI1	0	0	0	0	+	+	0	0	0	+/-	-	-	0	+/-	0	++	++
EI2	+	0	0	0	+	+	+/-?	+/-?	+/-?	+/-	+	+/-?	+	+/-	0	++	++
EI2a	0	0	0	0	0	0	--?	?	0	-	0	-	+	+/-	0	++	++
EI4	+?	0	0	0	0	0	+?	+?	+?	+/-?	0	+?	+/-	+/-?	0	++	++
EI5	0	0	0	0	0	0	+?	+?	+?	+/-?	+?	0	+	+/-?	0	+	++
EI6	0	+	++	0	+	++	0	0	0	+	0	0	+	+	0	+	0
EI7	0	0	0	0	+	0	0	+	+	0	0	0	0	0	0	0	+
EI8	0	+	+	0	+/-?	+?	0	+	+	+	0	0	+	+	0	+?	+?
EI9	0	+	+	0	+	+	0	0	0	+	0	0	0	+	0	0	++
EI10	+	0	0	0	0	0	+	+	+	+/-	0	0	+	+/-	0	+	++
EI11	+	++	+	0	+	++	+	+	+	+/-	0	0	0	+/-	0	+	0
EI12	0	+	+	0	0	+	0	0	0	+	0	0	0	+	0	+	+
DEI1	0	+	+	0	0	+	0	0	0	++	0	0	0	++	0	+	0
EI13	0	+	+	0	0	+	0	0	0	++	0	0	0	++	0	+	0

SA Objectives	SA 1: Housing	SA 2: Health	SA 3: Social inclusion	SA 4: Crime	SA 5: Vibrant communities	SA 6: Services and facilities	SA 7: Biodiversity/geodiversity	SA 8: Landscapes/townscapes	SA 9: Historic environment	SA 10: Air quality.	SA 11: Water quality	SA 12: Flooding	SA 13: Efficient land use	SA 14: Climate change	SA 15: Waste	SA 16: Employment	SA 17: Economic growth
EI14	0	0	+	0	0	+	0	0	0	++	0	0	0	++	0	+	+
EI15	0	0	0	0	0	0	0	0	0	+	0	0	0	+	0	0	++
EI16	0	0	+	0	0	+	0	0	0	++	0	0	0	++	0	+	0
<b>Our Environment and Surroundings</b>																	
CP14	+	+	0	+	+	+	++	++	++	+	+	+	+	++	+	0	+
CP15	++	+/-	0	0	+	+/-	+?	+?	+?	-	0	0	+	-	0	+	++
ES1	-?	+	0	0	0	0	0	0	0	+	0	+	0	++	+	0	-?
ES2	0	+	0	0	+	0	+/-?	+?	+	0	+	+	+	++	0	+	+
DES3	0	0	+	0	0	0	0	0	0	0	0	0	0	++	0	0	0
ES3	+	+	0	+	+	0	0	0	0	++	++	+	+	0	0	0	+
ES4	0	0	0	0	0	0	+?	+?	0	0	++	++	0	+	+	0	0
ES5	0	+	0	0	0	+	+?	+?	0	++	0	0	0	+	0	+	0
DES1	+	0	0	0	0	+	+	+	+	+	0	0	+	+	0	+	+
ES6	0	+	0	0	+	0	++	+?	0	+	+	+	0	+	0	0	0
ES7	0	0	0	0	0	0	+	++	+	0	0	0	0	0	0	0	+
ES8	0	+	0	0	0	0	++	++	0	+	+	+	0	+	0	0	0
ES9	0	+	0	0	0	0	+?	+?	+?	0	0	0	0	0	0	+	+
ES10	0	0	0	0	0	0	0	++	++	0	0	0	0	0	0	0	0

SA Objectives	SA 1: Housing	SA 2: Health	SA 3: Social inclusion	SA 4: Crime	SA 5: Vibrant communities	SA 6: Services and facilities	SA 7: Biodiversity/geodiversity	SA 8: Landscapes/townscapes	SA 9: Historic environment	SA 10: Air quality.	SA 11: Water quality	SA 12: Flooding	SA 13: Efficient land use	SA 14: Climate change	SA 15: Waste	SA 16: Employment	SA 17: Economic growth
ES11	0	+	0	0	+	0	+	++	++	+	+	+	0	+	0	0	0
ES12	0	+	++	+	++	+	0	+	+	+	0	0	0	++	0	+	+
DES2	0	+	+	0	+	0	++	++	?	+	+	+	0	+	0	0	0
ES16	0	0	0	0	++	0	0	+	0	0	0	0	0	0	0	0	+

**Table 6.2 Summary of the likely cumulative sustainability effects for the Stroud District Local Plan Review – Pre-submission Draft Local Plan (May 2021)**

SA Objective	Cumulative effect of the Pre-submission Draft Local Plan
SA1: Housing	++
SA2: Health	+/-
SA3: Social Inclusion	+
SA4: Crime	+
SA5: Vibrant communities	+
SA6: Services and facilities	++/-
SA7: Biodiversity/geodiversity	+/--
SA8: Landscapes/townscapes	+/--
SA9: Historic environment	+/--
SA10: Air quality	+/-
SA11: Water quality	+/-
SA12: Flooding	+/-
SA13: Efficient land use	+/--
SA14: Climate change	++/-
SA15: Waste	+
SA16: Employment	++/-
SA17: Economic growth	++

SA objective 1: To provide affordable, sustainable and decent **housing** to meet local needs.

- 6.3 The Pre-submission Draft Local Plan includes policies which will support the delivery of the required number of new homes over the plan period to address local housing need in the District. Policies CP2 and CP3 outline that the district will accommodate at least 12,600 additional dwellings between 2020 and 2040 with many of these homes to be delivered at the larger settlements and new growth points at Sharpness and Wisloe. Housing delivery in Stroud District may also contribute to meeting the future housing needs of Gloucester City if required. Land is safeguarded at Whaddon, and housing growth may be provided here in the longer term, subject to the location being consistent with the strategy of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS).
- 6.4 Policy CP8 requires that new housing development should be a high-quality design and should help to address local requirements in terms of housing type, tenure and size. A proportion of housing in the District will be provided as affordable homes, as set out in Policy CP9. The Pre-submission Draft Local Plan also addresses specific housing requirements of older people and people with mobility issues (Policy DCP2) as well as Gypsies and Travellers and Travelling Showpeople (Policy CP10).

6.5 Strategic site allocations at Stonehouse (PS19a), Cam (PS24 and PS25), Hardwicke and Hunts Grove (PS30 and G1), Sharpness and Newtown (PS34 and PS36) and Wisloe (PS37) have the potential to deliver a substantial number of new homes in Stroud to meet local needs. Furthermore, the strategic site allocation at Whaddon in the Gloucester fringe (G2) will help to meet the housing needs of Gloucester city, if required. These sites could also help to support the delivery of a range of new housing types in the District, including affordable homes. This is balanced by the inclusion of smaller local site allocations at which faster completion rates for new housing schemes are likely to be achieved.

6.6 Overall, a cumulative **significant positive** effect is likely in relation to housing.

SA objective 2: To maintain and improve the community's **health** with accessible healthcare for residents, including increasing levels of physical activity, especially among the young.

6.7 The Pre-submission Draft Local Plan's approach to protecting wellbeing and health in the District is set out in Policy DHC5. This policy states the Council will support proposals that include design measures to encourage healthier lifestyles. The approach includes promoting access to healthy foods, supporting physical and mental health through the provision of a multi-functional green infrastructure network and providing access to local health care facilities. The Pre-submission Draft Local Plan also includes Policies DHC6 and DHC7 which provide direct support for the protection of existing and the provision of new open spaces, outdoor recreation facilities, playing fields or allotments. The potential to encourage modal shift including active travel modes in the District is embedded in the Pre-submission Draft Local Plan through Policies DCP1, CP4 and CP5. These policies seek to facilitate improvements to the walking and cycle networks of the District and the provision of community facilities alongside housing growth through master planning of strategic developments. It is expected that the Pre-submission Draft Local Plan is likely to help provide opportunities for residents to benefit from more active and healthier lifestyles. The Pre-submission Draft Local Plan also includes policies (ES3, ES4 and ES5) that will help to prevent negative impacts on residents' health by requiring that development minimises its contribution to or potential to be affected by pollution, including that relating to noise, air and water.

6.8 The Local Plan's growth strategy, which is detailed in part by Policy CP2 and CP3, would result in development being concentrated at locations which currently provide access to the widest range of services and facilities. Critical mass would be provided at the new settlements at Sharpness and Wisloe which is likely to support the delivery of new services and facilities at these locations. This includes the delivery of local centres with GP surgeries through Strategic Site Allocation Policies PS36 at Sharpness and Strategic Site Allocation Policy PS37 at Wisloe. The growth strategy is likely to support residents' access to healthcare facilities and facilities which would allow for more active lifestyle choices among residents. It is noted, however, that the growth strategy may be detrimental in terms of supporting the delivery of services and facilities of a more substantial nature at more rural locations. There is also potential for there to be inadequate health related service provision in the early stages of development at the new settlements at Sharpness, in particular, and to a lesser extent at Wisloe which lies relatively close to a Tier 1 settlement at Cam.

6.9 Of the 36 site allocations included in the Pre-submission Draft Local Plan, 32 are likely to have a significant positive effect in relation to health. These are sites that are located in close proximity to healthcare facilities as well as to existing features which might encourage more active lifestyles among residents (e.g. areas of open space, footpaths, etc.), or they would incorporate an area of open space as part of the development and/or new healthcare facilities. However, seven sites are likely to have a significant negative effect in relation to health. These are sites that are not located within close proximity of healthcare facilities and assets which could help promote more active lifestyles, or they contain such an asset which might be lost dependent upon the design of development at the site. Many of the sites for which a significant negative effect has been identified to reflect the potential loss of an open space or recreation asset are required by the relevant site allocation policy to be developed to incorporate open space. However, development at these sites could result in loss of existing open space or recreation assets (such as PRow's or cycle paths) and a net loss of open space provision. It should be noted that for 20 of the sites for which a significant positive effect is expected and for all seven of these sites for which a significant negative effect is expected, this is as part of an overall mixed effect. The mixed effect has been recorded where the development of a site would result in the loss of an area of open

space or a recreation asset, but new provision would be made as part of development or there are other features of this type as well as healthcare facilities in close proximity.

- 6.10 Overall, a cumulative **mixed minor positive and minor negative** effect is likely in relation to health.

SA objective 3: To encourage **social inclusion**, equity, the promotion of equality and a respect for diversity and meet the challenge of a growing and ageing population

- 6.11 The Pre-submission Draft Local Plan includes a number of policies (DCP2, CP7, DHC5, DHC6, DHC7, DES2, EI6, EI8, ES12 and EI13) which directly seek to maintain and improve accessibility to services and amenities including active social, leisure and recreation opportunities. These policies are also likely to help provide opportunities for people from a variety of backgrounds with a range of needs (including older people and people with disabilities) to live and meet in attractive locations.
- 6.12 Through Policies CP2 and CP3, the Pre-submission Draft Local Plan directs a large proportion of new development to locations that allow for access to the widest range of services and facilities (i.e. the higher tier settlements as well as supporting the delivery of new services and facilities at large scale development at the new settlements at Sharpness and Wisloe. The Strategic Site Allocation Policies for these sites (PS36 and PS37) require the incorporation of new local centres that will help ensure that residents have nearby access to services and facilities. Focussing much of the new growth at larger settlements is likely to be of particular benefit in terms of facilitating improved levels of social inclusion. However, this approach could limit the delivery of similar services and facilities at smaller settlements and rural locations. There is also potential for there to be inadequate service provision in the early stages of development of the new settlements at Sharpness and Wisloe, which may limit the potential for this development to address the issue of social inclusion.
- 6.13 Despite these potential minor negative effects, overall, a cumulative **minor positive** effect is likely in relation to social inclusion.

SA objective 4: To reduce **crime**, anti-social behaviour and disorder and the fear of crime.

- 6.14 The majority of the Pre-submission Draft Local Plan policies, including all of the site allocation policies, are not likely to have a direct effect on this objective. Policies CP4, CP14, ES3 and ES12, however, are supportive of the creation of safe town centres and communities in which public safety is prioritised and the fear of crime is reduced, which will in part be achieved through high quality design and layout.
- 6.15 Policy CP14 does require development to consider crime prevention and community safety in the design and layout of developments. This issue will be further considered at the planning application stage and will likely be influenced by the inclusion of features such as street lighting and overlooked public spaces.
- 6.16 Overall a cumulative **minor positive** effect is likely in relation to crime.

SA objective 5: To create and sustain **vibrant communities**.

- 6.17 Policies ES12 and ES16 in the Pre-submission Draft Local Plan are expected to have a direct positive impact in relation to this SA objective. These policies have the potential to help increase the attractiveness of the District and increase residents' satisfaction with their neighbourhoods. In addition to helping to promote higher quality design of development and space to meet a variety of needs, these policies would also benefit the aesthetic quality of the District by supporting the provision of publicly accessible art and design works. The Pre-submission Draft Local Plan's policy approach (CP12) to addressing the District's needs in terms of town centres is expected to play a similar role in terms of creating vibrant communities. Policy CP12 will help improve the offer of appropriate uses at town centre locations according to the Retail Hierarchy. This will help to ensure that the highest number of residents can benefit from easy access to town centre services and facilities.
- 6.18 Policies CP2 and CP3 would result in much of the new development in the plan area being directed in and around settlements where there is already relatively high levels of community service provision. This includes through the development of large-scale urban extension sites.



These policies also direct a high amount of growth to new settlements at Sharpness (PS36) and Wisloe (PS37) which is likely to support provision of new community facilities at these locations in the long term. However, delivering much of the new development in this way may not be of benefit to rural communities and the smaller settlements in the plan area in terms of community facility provision, resulting in an imbalance across the District. The overall hybrid approach to the distribution of development in the plan area seeks to address this issue. At the majority of the Tier 3a settlements (Hardwicke, Brimscombe and Thrupp, Leonard Stanley, Frampton on Severn, Newtown and Sharpness, Kingswood and Whitminster) new development is to be provided at local site allocations. While none of the lower tier settlements have sites allocated at them, Policy DHC4 supports small housing schemes at Tier 3b and Tier 4 settlements to maintain their social sustainability. Furthermore, Policies HC4 and DHC4 support new housing schemes to meet the housing need at settlements (including at third tier settlements and fourth tier settlements where there is specific need and appropriate environmental consideration) and those initiated by local communities.

- 6.19 Of the 36 site allocations included in the Pre-submission Draft Local Plan, 18 are expected to have minor positive effects in relation to this SA objective. In most cases, this is because development would incorporate new community facilities, but in some cases, development would occur on brownfield land, thereby contributing to the regeneration of the District. Five site allocations (G1, G2, PS30, PS36 and PS37) are expected to have significant positive effects given that they are to deliver new local centres where new community and other uses are to be provided. These types of provisions should help to provide a focus for new service provision over the plan period and potentially in the longer term and will provide spaces in which positive interactions between residents are facilitated.
- 6.20 Overall a cumulative **minor positive** effect is likely in relation to the creation of vibrant communities.

**SA objective 6: To maintain and improve access to all services and facilities.**

- 6.21 Policies CP2 and CP3 would result in much of the housing development over the plan period being concentrated at locations that provide the best level of access to services, i.e. the Tier 1 settlements of Stroud, Stonehouse and Cam and Dursley as well as within the Gloucester fringe area. A significant amount of growth is also to be directed to new settlements at Sharpness (PS36) and Wisloe (PS37), which will provide new services and facilities within local centres as part of development and positive effects on this SA objective. However, this approach could limit the potential for new substantial services and facilities to be supported at the smaller and more rural settlements of the District. There is also potential for service and facility provision to be inadequate during the early stages of development at the new settlements.
- 6.22 Policies in the Pre-submission Draft Local Plan (Policies EI6, EI7, EI8 and EI9) which seek to protect the viability of town centres in the District are expected to help maintain access to service provision at these locations. Ensuring support for successfully functioning town centres and service provision in accessible locations, particularly by public transport, will be of benefit to a high number of residents within the District. Policies DHC6 and DHC7 seek to ensure that existing open spaces and recreation facilities are protected and opportunities to provide further facilities of this nature are maximised.
- 6.23 The majority of local site allocations included in the Pre-submission Draft Local Plan are expected to result in positive effects alone in relation to this SA objective due to their proximity to Tier 1, 2 or 3a settlements and in some cases through the provision of uses which would benefit access to services and facilities for the local population. The exception to this is local site allocation PS35, which would provide some benefits given that it is to incorporate new community uses, however, this site does not adjoin the settlement of Newtown which it is closest to. Residents at this site are therefore likely to lack nearby access to a range of existing services and facilities. Sites at the Tier 1 settlements of Stroud, Stonehouse and Cam and Dursley as well as at Whaddon at the urban edge of Gloucester city are expected to result in significant positive effects in relation to this SA objective as these locations provide good access to a range of services and facilities. Strategic site allocations (G1, G2, PS30, PS36 and PS37), which include delivery of local centres, are also expected to result in significant positive effects given that these locations will provide a focus for service provision over and possibly beyond the plan period.

- 6.24 Overall a cumulative mixed **significant positive and minor negative** effect is likely in relation to improving access to services and facilities.

SA objective 7: To create, protect, enhance, restore and connect habitats, species and/or sites of **biodiversity or geological interest**.

- 6.25 The Pre-submission Draft Local Plan includes policies which would support the conservation and enhancement of the countryside and biodiversity in the District as new development is delivered over the duration of the plan period. Policies DCP1, ES6, ES8, DES2, CP14, DHC6 and DHC7 provide the greatest potential for positive impacts in relation to this SA objective through a requirement to provide nature recovery and net gain in biodiversity at development sites, the protection of biodiversity designations and greenspaces and the incorporation of green infrastructure as growth occurs in the District.
- 6.26 However, the high level of development supported over the plan period through policy CP2 is likely to result in some habitat loss, disturbance and fragmentation as well as the potential for increased recreational pressures on designated biodiversity sites where new residential development is delivered. Most of the site allocations included in the Pre-submission Draft Local Plan are also likely to have a negative effect on this SA objective given that they would be within close proximity of a local, national or internationally designated biodiversity site. There is potential for particular pressures to result in relation to the Severn Estuary SAC/SPA/Ramsar site, Cotswold Beechwoods SAC and Rodborough Common SAC due to their sensitivity to residential development and recreational pressures.
- 6.27 Two site allocations located at Newtown and Sharpness (PS34 and PS36) are in close proximity of the Severn Estuary SAC/SPA/Ramsar site. A further two site allocations at Brimscombe and Thrupp (PS02) and South of Hardwicke (G1) include an identified green infrastructure asset which might be lost as a result of development. Therefore, the effect of development at these sites could be particularly adverse. However, the majority of site allocations are also expected to have positive effects on the natural environment through mitigation measures and delivery of green space outlined in their respective site allocation policies.
- 6.28 The HRA screening work undertaken<sup>70</sup> for the plan identified the potential for significant effects on Severn Estuary SAC/SPA/Ramsar, Rodborough Common SAC and Cotswolds Beechwoods SAC in relation to urban effects (covering effects relating to light, noise, cat predation, fly tipping, spread of invasive species and vandalism), loss of supporting habitat/functionally-linked land, recreation, water issues and air quality. However, the potential for most of these types of effects arising from development provided for in the plan to adversely affect the integrity of each of these European sites was ruled out through the appropriate assessment when taking into account the policy requirements in the Pre-submission Draft Local Plan as well as the findings of traffic modelling undertaken. In addition, strategic approaches are currently in place to address recreation impacts on the Rodborough Common SAC<sup>71</sup> and on the Severn Estuary SAC/SPA/Ramsar<sup>72</sup> and there is a draft strategy for the Cotswolds Beechwoods SAC. The HRA states that the adopted strategies will need to be updated to ensure they will deliver sufficient mitigation to address the scale of growth in the plan. Therefore, some uncertainty remains in relation to the adverse effects on the integrity of Rodborough Common SAC and on the Severn Estuary SAC/SPA/Ramsar, until this review of the relevant mitigation strategies is undertaken.
- 6.29 Overall a cumulative **mixed minor positive and significant negative** effect is likely in relation to biodiversity and geodiversity.

SA objective 8: To conserve and enhance the local character and distinctiveness of **landscapes and townscapes** and provide sustainable access to countryside in the District.

- 6.30 The large areas of rural countryside which surround the main and more peripheral settlements, play a large role in influencing the landscape character of Stroud District as well as the

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<sup>70</sup> Footprint Ecology (2021) *Habitats Regulations Assessment of the Stroud District Local Plan Review Pre-submission Draft Plan*

<sup>71</sup> Stroud District Council (2015) *Interim Strategy for Avoidance of Likely Significant Adverse Effects on Rodborough Common Special Area of Conservation (SAC)*

<sup>72</sup> Stroud District Council (2017) *Strategy for Avoidance of Likely Significant Adverse Effects on the Severn Estuary SAC, SPA and Ramsar Site*

townscapes of those settlements. The Cotswolds AONB to the east heavily influences the character of this portion of the District and is particularly sensitive to new development.

- 6.31 The Pre-submission Draft Local Plan contains a number of policies (CP5, DHC6, DHC7, CP14, CP15, ES7, ES8, ES10, ES11 and DES2) which are likely to help promote a high quality of design and the protection of existing green space and landscape character including important landscape features that characterise the District. In particular, Policy ES7 seeks to support proposals that will conserve and enhance the setting of the Cotswolds AONB, with priority to be given to the conservation and enhancement of the natural and scenic beauty of the landscape. Policies ES12 and ES16 may help to mitigate negative impacts relating to the aesthetic quality of settlements in the District by encouraging high quality design and layout of new development as well as opportunities to incorporate public art works.
- 6.32 The Local Plan's growth strategy (in particular elements of Policies CP2 and CP3) seeks to deliver much of the development over the plan period at the main settlements of the District thereby limiting the level of development which would be supported at the smaller and more rural settlements. Although much of the new growth would potentially avoid the more sensitive locations of the District particularly within the AONB, the high level of development required over the plan period will result in the loss of large areas of greenfield land and potential encroachment on the open countryside. Furthermore, development supported through the growth strategy would occur around some settlements which are noted to have high landscape sensitivity to new development.
- 6.33 The majority of site allocations set out for development in the Pre-submission Draft Local Plan are expected to have some adverse effect in terms of protecting and enhancing the local distinctiveness and character of landscapes in the District. Most of these sites have been assessed as having at least medium/low sensitivity (three sites) or medium sensitivity (13 sites) to development as set out in the Landscape Sensitivity Assessment for Stroud District or the landscape assessment work undertaken for the Gloucestershire Strategic Development Opportunities study. Ten sites are not covered by either assessment but are located within 500m of the AONB, meaning there are could be some more limited impacts on the setting of the AONB. This overview of the sites selected for allocation demonstrates that the majority have been taken forward at locations where the potential for impacts on landscape character is reduced.
- 6.34 However, seven sites at Stonehouse (PS20), Hunts Grove (PS32 and PS43), Newtown and Sharpness (PS36), Painswick (PS41) and Kingswood (PS47) and in the Gloucester fringe (G2) are allocated in areas which have been identified as having medium/high or high sensitivity to development through the landscape sensitivity studies undertaken<sup>73,74</sup>. While two sites included in the Pre-submission Draft Local Plan at Minchinhampton (PS05 and PS05a) lie in an area identified as being of medium sensitivity to residential development, they also lie within the AONB meaning there is potential for impacts on the setting of the designated landscape. Any impacts at site PS05a would be in the longer term given that the Plan safeguards this site to meet the future housing needs of Minchinhampton, if required. Development at all nine of these sites could have significant negative effects on landscape character in the District. It should be noted that for 26 of the site allocations, a mixed positive and negative effect is expected in relation to landscape character. The respective site allocation policies for these sites include the requirement for landscape buffers, and retention of key hedgerows and trees or contain specific reference for the need for development to ensure that landscape impacts are minimised.
- 6.35 Overall a cumulative **mixed (minor positive and significant negative)** effect is likely in relation to landscape.

**SA objective 9: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment.**

- 6.36 The scale and location of development included in the Pre-submission Draft Local Plan, as set out in Policies CP2 and CP3 could adversely affect heritage assets and their settings, particularly where development is to occur on larger scale greenfield sites. Loss of greenfield land is likely to

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<sup>73</sup> White Consultants on behalf of Stroud District Council (2016) *Landscape Sensitivity Assessment*

<sup>74</sup> LUC on behalf of Gloucester City Council, Cheltenham Borough Council, Tewkesbury Borough Council, Stroud District Council and Forest of Dean District Council (2019) *The Assessment of Strategic Development Opportunities in Parts of Gloucestershire*

significantly alter the setting of nearby heritage assets and may disturb archaeological assets on site. Development would also occur in close proximity to locations which are potentially sensitive in terms of heritage assets such as the Industrial Heritage Conservation Area which runs through Stonehouse and Stroud, as the proposed development strategy focusses much of the growth towards the main settlements. The Industrial Heritage Conservation Area is on the heritage at risk register meaning that it may be particularly sensitive to new development and change which is not considerate of its setting. However, the Pre-submission Draft Local Plan does encourage the re-use of brownfield land across the District by focussing much of the growth over the plan period within the settlement development limits of the larger settlements, through Policy CP3. This policy approach could result in beneficial effects in terms of the setting of heritage assets.

- 6.37 Policy ES10 relates mostly directly to the protection and enhancement of the District's heritage assets. Policies CP5, DHC6, DHC7, CP14, ES11 and DES2 are likely to support the delivery of high quality design across the plan area and protect important areas of greenspace and elements of the local built environment which provide the setting for heritage assets in Stroud District. In addition, Policies ES12 and ES16 seek to encourage design that is sympathetic to the existing townscape of settlements and increase the attractiveness of settlements through the incorporation of public art works.
- 6.38 A number of the site allocations included in the Pre submission Draft Plan are likely to have significant negative effects in relation to this SA objective. Sites at Brimscombe and Thrupp (PS01 and PS02), Minchinhampton (PS05 and PS05a), Stroud (PS10 and PS11), Stonehouse (PS20), Newtown and Sharpness (PS34) and Kingswood (PS47) have been identified as having significant or very significant heritage constraints as per the findings of the SALA heritage assessment. Conversely, site allocations PS01, PS02, PS10, PS11, PS12, PS27 and PS34 were identified through the SALA heritage assessment as having opportunities to achieve enhancements in terms of the historic environment. Furthermore, a mixed positive and negative effect is expected for a number of the site allocations due to mitigation measures outlined through their respective site allocation policies that are designed to respond to local context.
- 6.39 Overall, a cumulative **mixed (minor positive and significant negative)** effect is likely in relation to the historic environment.

**SA objective 10: To ensure that air quality continues to improve.**

- 6.40 The relatively high level of development supported over the plan period through the Pre-submission Draft Local Plan is expected to result in an increase in the number of journeys being made on a daily basis in Stroud District. Residents are likely to need to travel regularly to access services, facilities and employment sites, which could have an adverse impact on local air quality. However, the policy approach set out through Policies CP2 and CP3 goes some way to provide a spatial strategy for development that could help to minimise the need to travel, particularly by private car. By concentrating large proportions of housing development at Tier 1 settlements where there is currently the best access to services, facilities, jobs and infrastructure, there is potential to reduce trip distance and for a large proportion of trips to be made by more sustainable modes of transport.
- 6.41 Policies CP2 and CP3 also allow for a high proportion of development at new settlements at Sharpness (PS36) and Wisloe (PS37). These are large-scale developments that will have sufficient critical mass to support the delivery of services and facilities onsite and would incorporate sustainable transport infrastructure and employment land. The policy requirements for these sites seek to encourage modal shift, with a new railway station to be provided at the Sharpness site. The delivery of new development in line with Garden City Principles is likely to further promote the ability to achieve modal shift. However, there is a possibility that residents will have inadequate access to services and facilities during the early stages of development, which may result in a need to travel further afield using private car trips, resulting in decreased air quality in the short term.
- 6.42 Policies CP14, ES3 and ES5 of the Pre-submission Draft Local Plan require development proposals not to contribute to reduced air quality. In particular, Policy ES5 is likely to contribute significantly to limiting any increases in air pollution as new development is provided in Stroud District. This policy sets out specific mitigation criteria relating to air quality including approaches to the scale and location of transport infrastructure as well as supporting the expansion of the capacity of the

natural environment to mitigate poor air quality. The provision of infrastructure to support modal shift will be of particular importance to limiting air pollution as growth occurs in the District. Policy EI12 directly addresses this issue, but would also support the delivery of strategic road improvements, thereby increasing the potential for higher numbers of private car journeys to be made in the plan area. Policy EI13 seeks to directly support the provision of an alternative to private car travel by expanding the walking and cycling network in the District. Policy DHC7 relates to the provision of green open space and is also expected to help address issues of air quality in the District given the potential for increased sequestration of air pollutants.

- 6.43 Many of the site allocations have been identified as having the potential to require new residents or employees to travel greater distances on a regular basis as set out through the findings of the SALA Transport Accessibility Assessment. While local sites adjacent to Tier 1 settlements, such as PS10, PS11, PS12 and STR065 at Stroud and site PS28 at Dursley (all of which would provide an element of residential development), are particularly well related to existing services and facilities by more active modes of transport, seven site allocations are expected to have significant negative effects on air quality in the District due to the poor level of access they would provide to services and facilities. A number of site allocations would require development to be delivered to encourage the use of more sustainable transport modes. Strategic site allocations PS19a, PS20, PS30, G2 and PS36 are expected to have combined significant positive effects in relation to the potential to achieve modal shift in the long term as they would incorporate significant new sustainable transport infrastructure, including railway and rapid bus improvements as well as electric vehicle charging points.
- 6.44 Overall, a cumulative **mixed minor positive and minor negative** effect is likely in relation to air quality.

SA objective 11: To maintain and enhance the **quality of ground and surface waters** and to achieve **sustainable water resources management** in the District.

- 6.45 The Pre-submission Draft Local Plan's growth strategy, as set out in Policies CP2 and CP3, would result in the majority of development occurring by settlements which have been identified as containing land which mostly falls outside of Source Protection Zones. The pattern of development set out through this approach, however, would include large areas of land which fall within Drinking Water Safeguarding Zones and Source Protection Zones and could therefore have a significant negative effect on water quality; including 17 of the 36 site allocations. However, all ten of the strategic site allocations are expected to have a combined minor positive effect in relation to water quality. The respective allocation policies for these sites include a requirement for the provision of adequate and timely infrastructure to tackle wastewater generated by the development.
- 6.46 Despite the potential for negative effects on water quality due to development in areas safeguarded for drinking water sources, there are a number of policies (CP14, ES3, ES4, ES11 and DES2) that are likely to help mitigate these effects. In particular, Policy ES4 sets out specific criteria for development to ensure no deterioration of water quality and the enhancement of watercourse corridors and catchments. Policy ES4 would help to encourage improved water efficiency at developments. In addition, the design and construction techniques used for new development are likely to be able to avoid adverse effects on groundwater.
- 6.47 Overall a cumulative **mixed minor positive and minor negative** effect is likely in relation to water quality.

SA objective 12: To manage and reduce the risk of **flooding** and resulting detriment to public wellbeing, the economy and the environment.

- 6.48 The Pre-submission Draft Local Plan's policy approach includes the prioritisation of the use of brownfield land (Policy CP2), the regeneration of underutilised or low value employment sites (Policies EI2 and EI4) and the preservation and provision of open space and community facilities (Policies DHC6 and DHC7). The aforementioned policies have the potential to preserve greenfield areas of the District that contribute to the safe infiltration of surface water, thereby limiting the potential for increased flood risk as development occurs. The Pre-submission Draft Local Plan also includes Policy ES4, which makes the most significant contribution to this SA objective given that it specifically relates to addressing local flood risk. New development is to be sited with

consideration for the sequential test and implementation of the "Exception Test" where necessary and is required to incorporate SuDS.

6.49 The Pre-submission Draft Local Plan supports development which is to occur on sites which take in large portions of land in flood zone 3a and 3b in the District. Development at the site allocations at Brimscombe and Thrupp (PS01 and PS02) Stonehouse (PS20), south of Hardwicke (G1) Whaddon (G2) Berkeley(PS33), Newtown and Sharpness (PS34) and the new settlement at Sharpness (PS36) would result in increases in the number of residents who have potential to be affected by flooding in Stroud. As such, it is expected that the development of these sites would have significant negative effects in terms of flood risk in the district. However, the majority of draft site allocations are only likely to have minor negative effects because they are outside of the high-risk flood zones, but include areas of currently undeveloped land, the development of which is likely to increase risks of surface water runoff. Additionally, 17 of the site allocations are expected to result in minor positive effects (as part of an overall mixed effect) due to the requirement for surface water to be managed and disposed of appropriately (including through the use of SuDS) in their allocation policies.

6.50 Overall a cumulative **mixed minor positive and minor negative** effect is likely in relation to flooding.

**SA objective 13: To improve efficiency in land use and protection of soil quality through the re-use of previously developed land and existing buildings and encouraging urban renaissance.**

6.51 The Pre-submission Draft Local Plan includes several policies which are likely to promote a more efficient pattern of land use, including the redevelopment of brownfield sites in Stroud District. The growth strategy which Policies CP2 and CP3 form part of, directs a large proportion of new growth within the settlement development limits which may help to maximise the potential of brownfield land. Policies EI2 and EI4 seek to maximise the potential of existing employment sites through regeneration and expansion. Nevertheless, the relatively high level of development set out through the Pre-submission Draft Local Plan and the rural nature of much of the District means that large areas of greenfield land will be developed and therefore a significant negative effect on this SA objective is likely.

6.52 Many of the site allocations are on greenfield land, including sites at Minchinhampton (PS05), Leonard Stanley (PS16 and PS42), Stonehouse (PS19 and PS20), Cam (PS24 and PS25), Hardwicke and Hunts Grove (PS30, PS32 and PS43), Whaddon (G2), Berkeley (PS33), Kingswood (PS38 and PS47), Painswick (PS41), Frampton (PS44) and Whitminster (PS45 and PS46) as well as the new settlements at Newtown and Sharpness (PS36) and Wisloe (PS37). These greenfield sites are large and/or contain Grades 1, 2 or 3 agricultural soils which are likely to be lost as a result of development (although much of the land within the boundaries at PS37 has been identified as being Grade 3b, which is not classified as 'best and most versatile' land).

6.53 Overall a cumulative **mixed minor positive and significant negative** effect is likely in relation to the efficient use of land and preservation of higher value soils.

**SA objective 14: To implement strategies that help mitigate global warming by actively reducing greenhouse gases and adapt to unavoidable climate change within the District.**

6.54 The Pre-submission Draft Local Plan includes an overarching policy (DCP1) which seeks to ensure carbon neutrality in the District by 2030, which is ahead of the Government target of 2050. To achieve this aim, the policy sets out a number of criteria which new development will be required to meet. The growth strategy of the Pre-submission Draft Local Plan detailed through Policy CP2 and Policy CP3 is likely to support the achievement of this target by focussing a high proportion of new growth at the larger settlements of the District where residents will have reduced need to travel long distances on a regular basis to access services and facilities.

6.55 Residents at the new settlements of Sharpness (PS36) and Wisloe (PS37) would benefit from a good level of access to services and facilities once these strategic sites are fully built out although it is noted that there could be increased need to travel from the Sharpness site, in particular, in the early stages of development, given its more isolated location. The level of service provision and employment land to be incorporated at both new settlement sites could help to promote a degree of self-containment in the long term. Additionally, these sites are to incorporate zero

carbon energy generation, which will contribute to mitigating the District's emissions from domestic sources.

- 6.56 The scale of development set out in the Pre-submission Draft Local Plan, however, will inevitably result in an increase in the number of journeys undertaken in the plan area. Considering that many of these trips will be made by private vehicle the level of growth supported will be to the detriment of climate change. Development may particularly affect emissions during the initial construction phase due to transport to and from construction sites. The District's contribution to climate change for the most part, however, will be impacted upon by the number of day-to-day journeys undertaken and how these journeys are made, which Policies DCP1, CP2 and CP3 may help to mitigate.
- 6.57 The high levels of residential and employment growth for the District, which are set in Policy CP2, would result in increased levels of travel locally but may also help to support an increased level of self-containment in Stroud District. Some of the economic growth would take place at the M5/A38 corridor which would provide varying levels of access to employment opportunities for residents within the main settlements in the District. Furthermore, providing employment at these locations could result in some in commuting by private car given the high level of accessibility to the strategic road network.
- 6.58 Other policies in the Pre-submission Draft Local Plan (EI12, EI13 DEI1, DES2, ES1, ES2, DES3 ES4) support transport, energy and flood management measures which are likely to help provide climate change mitigation and adaptation as development is delivered over the plan period. These policies will contribute to modal shift in Stroud District. They will also have benefits relating to climate change given that they should help to incorporate new green infrastructure which will support carbon sequestration, help to manage flood risk, support more sustainable design and construction practices, as well as the delivery of new infrastructure which supports energy generation from renewable sources and more efficient heat supply.
- 6.59 Overall a cumulative **mixed significant positive and minor negative** effect is likely in relation to climate change and reducing greenhouse gas emissions.

SA objective 15: To minimise the amount of **waste** produced, maximise the amount that is reused or recycled, and seek to recover energy from the largest proportion of the residual material, and achieve the sustainable management of waste.

- 6.60 It is expected that the level of growth, as set out in Policy CP2, would result in increases in local waste production. However, new development may help to encourage sustainable waste management or recycling practices dependent upon whether new infrastructure and storage space to support changes in the behaviour of local people is provided. Furthermore, the delivery of high levels of development will not adversely impact upon rates of recycling and re-use in the District. This is likely to be encouraged through Policy DCP1, which requires all development to be designed to reduce waste in accordance with the waste hierarchy to promote a circular economy. Policies CP4 and CP5 are likely to contribute positively to the achievement of higher rates of recycling in Stroud as they require that development proposals must adequately consider storage space for waste collection materials and that strategic sites minimise waste and maximise recycling during construction. The potential for sustainable construction techniques as well as the operation of new development to minimise waste is supported through Policy ES1, which sets out specific criteria that development proposals should fulfil. Policy CP14 states that development in the District should respect environmental limits, which includes minimising the amount of waste produced.
- 6.61 Furthermore, prioritising the use of brownfield land to provide future growth in the District is a theme which runs through much of the Pre-submission Draft Local Plan. It is expected that this approach to new development in the District may help to encourage the re-use of onsite buildings and materials thereby limiting construction and demolition waste. The growth strategy, which is partially set out through Policy CP3, directs a high proportion of development to areas within the settlement development limits where the potential for re-use of brownfield sites is likely to be highest.
- 6.62 Twelve of the site allocations, including those located at Brimscombe (PS01 and PS02), Nailsworth (PS06), Stroud (PS10, PS11, PS12 and STR065), Stonehouse (PS17), Dursley (PS27 and PS28) and Newtown and Sharpness (PS34 and PS35) contain significant portions of

brownfield land and development at these locations may result in the re-use of onsite buildings and materials dependent upon the design of proposals which come forward.

- 6.63 Overall, a cumulative **minor positive** effect is likely in relation to waste.

**SA objective 16: To deliver, maintain and enhance sustainable and diverse employment opportunities, to meet both current and future needs.**

- 6.64 The proposed growth strategy in the Pre-submission Draft Local Plan seeks to provide 72ha of new employment land to meet needs in Stroud District between 2020 and 2040. It seeks to provide economic growth and additional jobs on and adjacent to existing high value employment sites as well as within the M5/A38 corridor and as part of mixed used developments. Policies CP2 and CP3 set out the specific locations where most of the employment growth is to occur, many of which are located in areas with access to the motorway or A-road network and are well related to the larger settlements.
- 6.65 By concentrating employment growth within the A38/M5 corridor and at locations where housing growth would also be provided, the Pre-submission Draft Local Plan is expected to help maximise the potential for inward investment that will ensure that new employment sites are supported by strategic scale transport infrastructure. This new economic growth and the resultant employment opportunities provided may, however, be less accessible to some people in the District; particularly those at smaller settlements and more rural locations which are not as well related to the A38/M5 corridor.
- 6.66 It is expected that the updates to the settlement boundaries set out through Policy CP3 would have both positive and negative effects in relation to the provision of accessible employment opportunities in the District. While the settlement boundaries may act to limit the area at which employment development is acceptable, the update boundaries would result in the majority of new employment opportunities being provided at locations which are in close proximity to a large number of residents. The boundaries would also allow for a compact pattern of development which may help to promote vitality and viability resulting in inward investment and job creation.
- 6.67 Policy CP11 directly addresses new employment development in Stroud District with new provision to be supported at a range of sites and premises across the District. New development should not hinder existing employment and where possible should be readily accessible by public transport. Policies EI1, EI2, EI2a, EI4, EI5 and EI10 also make particular contributions to the achievement of employment provision in the District. These policies are likely to help protect existing key employment sites in Stroud District. Appropriate redevelopment for mixed uses is to be supported at certain employment sites where the overall employment offer is at least the same as it was prior to the new proposal. They will also help to support the viability and diversification of rural employment opportunities by allowing the appropriate extensions of rural employment sites as well as farm or forestry diversification schemes and rural tourism. The Pre-submission Draft Local Plan also supports some employment provision at the District's town centres through Policy CP12.
- 6.68 Several site allocations are expected to be of particular benefit in terms of providing accessible employment opportunities in the District. This includes sites at Stroud (PS12 and STR065), Stonehouse (PS17, PS19a and PS20), Cam (PS24 and PS25), Dursley (PS28), Berkeley (PS33), Newtown and Sharpness (PS36), Javelin Park by Hunts Grove (PS43) and Kingswood (PS47). These are sites which would deliver a large amount of employment land or would provide new homes in close proximity to a key employment site and within a Tier 1 or 2 settlement where further employment opportunities are likely to be located. Of the strategic employment sites included in the Pre-submission Draft Local Plan, only the Quedgeley East Extension (PS32) is expected to deliver less than 10ha of employment land. This site would support improved access to employment opportunities in the plan area but unlike the aforementioned sites, the positive effect is unlikely to be significant. Sites at Hardwicke (HAR017), Stroud (PS12), Newtown and Sharpness (PS35), Leonard Stanley (PS42) and Whitminster (PS45 and PS46) have been identified as containing a current employment use or are not within close proximity to employment site and are not at a Tier 1 or 2 settlement. These sites therefore have the potential to have a negative effect.
- 6.69 Overall a cumulative **mixed (significant positive/minor negative)** effect is likely in relation to employment opportunities.



SA objective 17: To allow for sustainable **economic growth** within environmental limits and innovation, an educated/ skilled workforce and support the long term competitiveness of the District.

- 6.70 The Pre-submission Draft Local Plan's growth strategy, as set out in part through Policy CP2, is likely to be beneficial in relation to encouraging inward investment. The proposed development strategy would focus employment growth within the A38/M5 corridor and create new sustainable communities at locations (most notably at Sharpness (PS36) and Wisloe (PS37)) where development can provide new and improved services and infrastructure. The relatively high level of growth concentrated at a number of locations where economic development would benefit from access to strategic transport infrastructure is likely to prove attractive to developers and in the longer term would support enhancements to existing infrastructure. The settlement development limits set out through Policy CP3 have the potential to limit the areas where economic growth could occur but would focus growth at more sustainable locations and is also likely to help support the viability of town centres in Stroud District.
- 6.71 New employment development is supported at a range of sites and premises across the District as set out through Policy CP11. Ensuring that new development should not hinder existing employment is likely to help continue support for economic growth in the District. Policies EI1 and EI2 protect key employment sites, and support redevelopment of other employment sites where mixed use development is provided and a decrease in employment opportunities would not result. This approach is likely to mean that those sites which are currently most attractive to businesses are maintained for economic use and regeneration occurs where at least the same employment opportunities for the local community would be provided by the new development. The Pre-submission Draft Local Plan, through Policies EI4, EI5 and EI10, also supports diversification of the rural economy. These policies would allow for the extension of rural employment sites as well as farm or forestry diversification schemes and rural tourism provided that the necessary criteria are met.
- 6.72 Requiring developers to support infrastructure provision through appropriate contributions, may make development less viable in certain circumstances. However, the requirement for contributions through CIL in line with the Infrastructure Delivery Plan (IDP) set out through Policy CP6, is expected to help support long term investment in the District. Transport improvements and mitigation that will help to ensure the successful functioning of employment land and town centres in the District will help to foster future economic growth and business start-ups. The policy will also help to promote long term skills uptake through support for education facilities.
- 6.73 The site allocations in the Pre-submission Draft Local Plan which would allow for residential growth in close proximity to both a primary school and a secondary school (and therefore good access education opportunities dependent upon the capacity of existing schools) or would allow for a high level of employment development are expected to be of particular benefit in terms of achieving this SA objective. This includes the employment sites PS43 Javelin Park and PS47 at Renishaw New Mills. The strategic site at the M5 Junction 13 Eco Park, Stonehouse (PS20) would also provide a similarly high level of employment growth. Additional strategic sites at Stonehouse (PS19a) and Hardwicke (G1), the local site allocation at Stonehouse (PS17) as well as the new settlements to be provided at Sharpness (PS36) and Wisloe (PS37) are likely to help promote educational attainment in the District by supporting the delivery of new education facilities onsite or providing access to nearby existing education facilities.
- 6.74 Overall a cumulative **significant positive effect** is likely in relation to economic growth.

## In-combination effects

- 6.75 There is potential for the cumulative effects described above to give rise to in-combination effects with development planned for areas that are outside of but in close proximity to the District. In-combination effects may also occur with county-wide initiatives such as transport infrastructure projects within Gloucestershire County. **Table 6.3** sets out relevant plans which are considered most likely to give rise to in-combination effects with the effects identified for the Stroud District Plan Review alone.

**Table 6.3 Summary of development with potential to result in in-combination effects with Stroud District Plan Review – Pre-submission Draft Local Plan**

Plan	Progress	Development proposed with potential for in-combination effects with development within Stroud
<p>Stroud District is bordered by the <b>Forest of Dean District</b> to the west. The boundary with the Forest of Dean District is formed by the extent of the River Severn meaning that distance between the two local authority areas is more than 1.0km in many places.</p>		
<p><b>Forest of Dean District</b> <i>The current Adopted Local Plan includes the Core Strategy (February 2012) and the Allocations Plan (June 2018)</i></p>	<p>The Forest of Dean District Core Strategy was adopted in February 2012 and sets the overall vision for how the district and places within it should evolve up to 2026. The Allocations Plan includes sites for housing, employment, shopping and other built development.</p> <p>The District Council is currently reviewing the Local Plan to guide development up to 2041. The review process reached the preferred options stage in 2020 and a consultation took place up to January 2021. The Strategic Option consultation did not identify specific sites although general areas considered appropriate for development were referred to. Consultation on the Draft Local Plan is due to commence in spring 2021.</p>	<p>The Core Strategy (Policy CSP5) sets out that Lydney (1,900 homes), Cinderford and Ruspidge urban area (1,050 homes), Coleford (650 homes) and Newent (350 homes) would accommodate a large proportion of the 5,162 homes required over the plan period. Development within Lydney (and most notably site A47 'East of Lydney' which would provide 1,684 homes) is in close proximity to the boundary with Stroud. Development within Cinderford and Newent would approximately 5.0km and 10.0km from the Stroud boundary respectively. Much of the new growth at Cinderford would be provided within the Northern Quarter AAP boundary which is located on the far north western side of the existing development at the settlement. A comparatively small amount of development (95 homes at each site) is to be delivered at both Newnham and Tutshill but the sites allocated in the Allocations Plan lie in relatively close proximity to the District boundary formed by the River Severn.</p>
<p>Stroud District is bordered by <b>Gloucester City</b> and <b>Tewkesbury Borough</b> to the north.</p>		
<p><b>Gloucester City and Tewkesbury Borough</b></p>	<p>The JCS was adopted by Gloucester City Council, Cheltenham Borough Council, and Tewkesbury</p>	<p>The JCS (Policy SP1) sets out that provision will be made to meet the need for approximately 35,175 new</p>

Plan	Progress	Development proposed with potential for in-combination effects with development within Stroud
<p><i>The adopted plan in both authorities comprises the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) (December 2017) with saved policies from the Gloucester Local Plan (1983) also material in that authority area</i></p>	<p>Borough Council in December 2017. It sets the plan for co-ordinated strategic development in Gloucester City, Cheltenham Borough and Tewkesbury Borough up to 2031. Only two policies from the 1983 Local Plan are relevant for planning decisions in Gloucester City and these relate to heights of buildings and the site identified at Abbeydale to provide two Primary Schools.</p> <p>The JCS authorities are currently reviewing the plan to guide development up to at least 2036. Consultation was undertaken from November 2018 to January 2019 on the Issues and Options. The Preferred Options plan is being prepared for consultation in the summer/autumn of 2021.</p> <p>Tewkesbury Borough Council submitted the Tewkesbury Borough Plan for examination in May 2020. Gloucester City Council submitted the Gloucester City Plan for examination in November 2020. While the JCS identifies larger sites for housing and employment and deals with strategic issues such as major infrastructure delivery and transport, once adopted the district level plans will set out additional site allocations for smaller scale growth and detailed policies to guide development.</p>	<p>homes and a minimum of 192 hectares of B-class employment land across the plan area up to 2031. At least 13,287 dwellings are to be provided within the Gloucester City administrative boundary. Strategic allocations (policy SA1) set out to help provide this level of housing include the Winneycroft Strategic Allocation (620 homes), and urban extensions at Innsworth and Twigworth (2,295 homes and 9.1ha of employment land), South Churchdown (1,100 homes and 17.4ha of employment land) and North Brockworth within Tewkesbury Borough (1,500 homes and 3.0ha of employment land). The strategic allocations mostly lie on the far northern side of development within Gloucester city, the exception to this being the site at North Brockworth which is within 1.5km to the north of the Stroud District boundary. To meet the needs of Tewkesbury Borough, the JCS will make provision for at least 9,899 new homes, at least 7,445 of which will be provided through existing commitments, development at Tewkesbury town, and smaller-scale development meeting local needs at Rural Service Centres and Service Villages.</p>
<p>Stroud District is bordered by the <b>Cotswold District</b> to the east.</p>		
<p><b>Cotswold District</b></p>	<p>The Cotswold District Local Plan was adopted in August 2018 and set out policies</p>	<p>The plan sets out to deliver at least 8,400 dwellings and at least 24 hectares for B</p>

Plan	Progress	Development proposed with potential for in-combination effects with development within Stroud
<p><i>Cotswold District Local Plan 2011-2031 (August 2018)</i></p>	<p>and proposals to meet the challenges facing the area up to 2031.</p>	<p>class employment use from 2011 to 2031 at the Principal Settlements. A large proportion of the new development (2,350 homes and 9.1ha of employment land) is to be provided at the strategic site south of Chesterton in Cirencester which lies outside of the AONB within proximity 7.0km to the east of the Stroud District boundary. Tetbury within the AONB is within 2.5km of the Stroud District boundary and includes sites which would provide modest amounts of development (43 homes and 18 homes at Blind Lane and Northfield Garage respectively).</p>
<p>Stroud District is bordered by the <b>South Gloucestershire District</b> to the south.</p>		
<p><b>South Gloucestershire District</b></p> <p><i>The development plan includes the Core Strategy 2006-2027 (December 2013) Policies, Sites and Places Plan (PSP Plan) (November 2017)</i></p>	<p>The Core Strategy was adopted in December 2013 and the PSP Plan was adopted in November 2017. The Core Strategy forms the strategic component of the Council's Local Plan up to 2027, while the PSP Plan sets out development management policies and details of town centres and site allocations.</p> <p>A new Local Plan is being developed for South Gloucestershire. Consultation on the Issues and Approaches took place from November 2020 to March 2021.</p>	<p>The Core Strategy identifies that 28,355 new homes are to be delivered in the period 2006 to 2027. Housing and employment development (Policy CS11 and Policy CS15) is mostly to be concentrated within the Bristol North Fringe/East Fringe urban areas to the south of the district. Development within the Yate/Chipping Sodbury and Thornbury would be within 5.0km and 6.0km of Stroud District respectively, to the south. This development would allow for greater self-containment at these settlements. Land at Yate is to allow for up to 3,000 new homes with 97ha of employment land allocated or safeguarded. At Thornbury 800 new homes and 19ha of safeguarded employment land are set out.</p>

Plan	Progress	Development proposed with potential for in-combination effects with development within Stroud
<p>The three <b>West of England Combined Authority Councils</b> – Bath and North East Somerset, Bristol City, and South Gloucestershire are working together to produce a West of England Spatial Development Strategy (SDS). Stroud District is bordered by South Gloucestershire area to the south.</p>		
<p><b>West of England</b> <i>Spatial Development Strategy</i></p>	<p>The Spatial Development Strategy will set out the vision for how people will live, work and play in the West of England over the next 20 years and will help deliver the West of England Combined Authority's (WECA) commitment to achieve carbon neutrality by 2030. Statutory consultation on the draft plan is due to take place later in 2021.</p>	<p>N/A</p>
<p><b>Gloucestershire County Council</b> is responsible for providing the transport strategy for Stroud District, as well as Cheltenham, Cotswold District, Gloucester City and Tewkesbury.</p>		
<p><b>Gloucestershire County Council</b> <i>Gloucestershire's Local Transport Plan (LTP) 2020-2041 (March 2021)</i></p>	<p>The Gloucestershire LTP sets the strategic transport vision for the county to 2041. The plan sets out the overarching and mode policies that support the spatial Connecting Places Strategies (CPS) and the Transport Scenarios, looking to 2041. Each CPS area set out priorities based on strategic, major and local schemes. The overarching vision for the LTP is a resilient transport network that enables sustainable economic growth by providing travel choices for all, making Gloucestershire a better place to live, work and visit.</p>	<p>Within Stroud up to 2031 highways improvements and junctions improvements are identified at the A419 corridor at Stonehouse; B4066 corridor at Berkeley; Cainscross roundabout, Stroud; Dursley Relief Road; A4135/B4066 Dursley Road roundabout, Dursley; A38/B4066; A4135/B4060, Woodfield roundabout, Dursley; A419/A46 Dudbridge Road roundabout, Stroud; A419 / Dr Newton's Way, Stroud; A46/Bath Road (Dudbridge Road); and A38/Alkington Lane.</p> <p>More substantial active travel improvement priorities are identified for Cam and Dursley 'Active Travel Route' to the Railway Station; Stroudwater Navigation to Gloucester and Sharpness Canal; B4008 between Little Haresfield (M5 J12) and Stonehouse corridor; Cycle access improvements at multiple locations including</p>

Plan	Progress	Development proposed with potential for in-combination effects with development within Stroud
		<p>between Chalford and Cirencester, Stroud and Chalford and Eastington and Nailsworth; and an Active Travel Route between Wotton-Under-Edge and Charfield.</p> <p>More substantial public transport scheme priorities are set out such as Strategic Park and Interchange hub scheme for M5 J13 / A419; Bus stop and bus advantage improvements for the Stroud – Gloucester Corridor; Park and Interchange hub at Cam and Dursley Railway Station; Rail junction and capacity improvements to rail lines between Cam and Dursley and Charfield; new railway station(s) to the south of Gloucester, north of Bristol; and Stonehouse Railway Station improvements.</p>

- 6.76 In combination with the level of housing and employment development proposed in the Stroud Pre-submission Draft Local Plan, development set out in the various local plan documents above is likely to reinforce the significant positive effects already identified in relation to SA objective 1: **housing**, as well as SA objective 16: **employment** and SA objective 17: **economic growth**. The employment growth provided at settlements which are well related to the District may help to balance the redevelopment of existing employment sites for alternative uses at Stroud and Newtown and Sharpness. The new employment growth at Gloucester and South Gloucestershire (most notably at Thornbury) is likely to prove particularly accessible to residents of Stroud District considering that the strategic road (M5 and A38) network runs directly through these areas, although this may increase commuting by car with potentially negative effects on air quality and climate change as discussed below.
- 6.77 Service provision and the creation of vibrant and successfully functioning communities are important factors for consideration when delivering high levels of new growth in any area. The level of growth proposed across the entirety of the District and the surrounding areas has the potential to result in local capacity issues relating to service provision. Larger scale new development is however also likely to support new service provision in the long term. Where new growth is supported in areas which are well related to the District boundary, any new services provided will be of particular benefit to the nearby rural communities of Stroud District. This is particularly likely to be the case for new development at the city of Gloucester, Brockworth and Thornbury considering their accessibility via the strategic road network. Development at Yate is also likely to be beneficial in this respect but would lack the same level of access from Stroud District considering that the most direct route is provided by the B4060. As such, development provided outside of the District has the potential to result in additional positive effects identified in relation SA objective 2: **health**, SA objective 3: **social inclusion**, SA objective 5: **vibrant communities** and SA objective 6: **access to services and facilities**. Further mitigation of negative effects relating to the accessibility of services and facilities and associated effects

relating to promoting improved levels of public health and social inclusion, and the creation of more vibrant communities is contained in the policies of the Pre-submission Draft Plan itself (please see the Mitigation section below). It is expected that these policies would help to ensure new services and facilities are provided to support new residents, encourage development which responds to the needs of a range of types of residents and ensure satisfaction with the new development provided.

- 6.78 The loss of greenfield land to development in the District combined with development proposed in surrounding areas has the potential to result in fragmentation of existing habitats and impacts on ecological features. Development sites allocated in the JCS area by Gloucester city (at Brockworth in particular) and in Forest of Dean at Lydney, as well as at the smaller sites included at Newnham and Tutshill have the potential to result in increased human activities to the detriment of biodiversity at Cotswold Commons and Beechwoods NNR and Cotswold Beechwoods SAC and the Severn Estuary SAC/SPA/Ramsar site, which would be over and above the effects identified for the Pre-submission Draft Plan alone. Impacts may result in terms of urban effects, loss of supporting habitat/functionally-linked land, recreation, water issues and air quality. The significant negative identified in relation to SA objective 7: **biodiversity/geodiversity** therefore has the potential to be exacerbated, although it recognised that the minor positive effect identified could be strengthened through the incorporation of appropriate mitigation at new development locations, including through the delivery of new green infrastructure. Those sites allocated within the Forest of Dean which are in closest proximity to the Severn Estuary site (Newnham and Tutshill) are required to be compatible with the Habitats Regulations. The submitted Local Plans for Tewkesbury and Gloucester City contain policies to require development to consider the potential for increased recreation pressures or air quality issues in relation to the Cotswold Beechwoods site. Recreation pressures should be addressed in line with the SAC mitigation and implementation strategy. The cross boundary mitigation strategies are expected to help mitigate the potential for increased adverse effects on these European sites.
- 6.79 It is also likely that the level of growth expected in-combination, which will involve the development of large areas of greenfield land as well as the intensification of uses at other sites, will have impacts in terms of the existing character of the area. These impacts are likely to relate to both landscape character and the setting of the historic environment. Similar to the approach of the Stroud Pre-submission Draft Local Plan, much of the new development in the surrounding authority areas would be delivered to avoid the Cotswolds AONB. A large proportion of the new growth which is in close proximity to Stroud in Cotswolds District is to be directed towards Cirencester outside of the AONB boundaries. Within the Forest of Dean development (45 dwellings and 4ha of employment land) would occur at Lydbrook which lies within the Wye Valley AONB. While this development would not affect the special character of the Cotswolds AONB, parts of which lie within Stroud District, it could lead to degradation of the landscape character of the wider area. As such there is potential for the significant negative effect identified in relation to SA objective 8: **landscape/townscape** and SA objective 9: **historic environment** to be strengthened. However, there is potential for development in the surrounding areas to provide opportunities to improve local character through appropriate landscape design, the incorporation of green infrastructure and bringing brownfield land back into appropriate uses. Mitigation requirements set out through policies in the surrounding area's local plan documents may provide further benefits in relation to these SA objectives meaning that there is potential for the minor positive effects identified in combination to be strengthened.
- 6.80 The LTP includes sustainable transport improvements such as to bus, rail, pedestrian and cycle access as well as local Park and Interchange infrastructure. This includes the potential delivery of one or more new railway stations in the District to the south of Gloucester and north of Bristol. However, the schemes identified also include improvements to the strategic road network. These improvements could help to limit the potential for adverse impacts in terms of air quality (particularly by encouraging modal shift and reducing the potential for congestion) and the release of greenhouse gases in the area. There is also potential for the increased capacity of the strategic road network in the plan area to allow for a higher volume of vehicles being accommodated on roads in the plan area, which may limit the potential to encourage modal shift. As a whole, the development in the District and that in the surrounding areas, is likely to result in an increase in the number of trips being made regularly to commute or meet other local needs. As such, there is potential for both the mixed minor positive and minor negative effect identified in

relation to SA objective 10: **air quality** and the mixed significant positive and minor negative effect identified in relation to SA objective 14: **climate change** to be strengthened.

- 6.81 The delivery of a relatively high level of growth within Stroud District and in the surrounding areas combined, will result in the development of a substantial amount of greenfield land. This is likely to take in areas of Grade 2 and Grade 3 agricultural land, as well as a small amount of Grade 1 agricultural land to the west and north of the city of Gloucester. Similar to the Stroud Pre-submission Draft Local Plan, focussing much of the growth at the larger settlements of the JCS and South Gloucestershire areas in particular are likely to provide further opportunities to allow for the redevelopment of brownfield land when considering wider in-combination effects. As such, the significant negative effect which has been identified in combination with a minor positive effect in relation to SA objective 13: **land use** is likely to remain when considering in-combination effects.

## Recommendations

### Emerging Strategy stage

- 6.82 The SA findings relating to the emerging future growth strategy and the site options for the District contained in the Emerging Strategy Paper (November 2018) as presented in **Appendix 3** and **Appendix 5** of this report were initially presented as internal notes to the Council in late summer 2018. This work included a summary of the sustainability effects for the four potential growth strategy options as well as the site options considered for allocation by the Council.
- 6.83 The SA concluded that the growth strategy option which would result in a more concentrated pattern of development would perform slightly better in sustainability terms overall than the other three options. Therefore, it was recommended that a hybrid option which resembled the concentrated development option but also included growth at the one or two growth points and/or one or two of the smaller towns and larger villages as well might be taken forward. This approach could achieve the potential growth, uplift and funding for the provision of new infrastructure of including a small number of large growth points within the District while also avoiding the areas of the District which are most constrained by sensitive features. The SA also recommended that in selecting site options to allocate, there would be a need to avoid settlements where negative environmental effects on biodiversity/geodiversity, landscape/townscape, historic environment, water quality and flooding are more likely.
- 6.84 The Council took these SA recommendations into account as part of the production of the Emerging Strategy Paper.

### Draft Plan stage

- 6.85 The SA Report of the Stroud District Draft Local Plan identified a number of additional recommendations, which were considered by the Council (alongside consultation responses) when preparing the Pre-submission Draft Local Plan. The recommendations included in the SA Report of the Draft Local Plan and the Council's responses to these are detailed in **Table 6.4** below.

**Table 6.4 Recommendations at the Draft Plan stage and Council's response**

Recommendation	Council's response
Delivery policies could include support for the remediation of contaminated land.	The policy wording of Delivery Policy HC1 in the Pre-submission Plan has been amended to include explicit support for the remediation of contaminated land.
Delivery policies could include the requirement for residential development not to be sited in close proximity to unsuitable neighbouring uses (e.g. waste management facilities, the strategic road network or railway lines), which might otherwise have impacts on the residential amenity of the new development.	Core Policy CP14 High quality sustainable development and Delivery Policy ES3 Maintaining quality of life within environmental limits seek to manage new development to ensure no unacceptable levels of air, noise, water, light or soil pollution or exposure to unacceptable risk from existing or potential sources of pollution.



Recommendation	Council's response
<p>Policy ES2 could be updated to make explicit reference to requiring proposals for wind development to avoid adverse effects on the integrity of the Severn Estuary SAC, SPA and Ramsar site. The policy is supportive of larger schemes of this nature at locations in close proximity to this designated site meaning specific consideration for its protection should be included through the policy. This recommendation may be influenced by the conclusions of the HRA in relation to the Severn Estuary site, which are currently being finalised.</p>	<p>Supporting text clarifies the policy approach taken in Policy ES2 to identify all land with technical potential according to the District's Council's Renewable Energy Resources Assessment (RERA) (2019) as suitable for wind development; but to require that all proposals on this land also satisfy a variety of criteria that will ensure that impacts upon the environment and amenity of the district, with specific reference to biodiversity, can be adequately controlled. These criteria are set within the policy which are an additional requirement to being in a suitable area on the Policies Map.</p>
<p>Policy ES6 could be updated to refer directly to the need to ensure development would not result in detrimental impacts relating to the Severn Estuary SAC, SPA and Ramsar site as well as Rodborough Common SAC considering the particular sensitivities of these sites to residential development and the catchment areas which have been identified for these sites. This recommendation may be influenced by the conclusions of the HRA in relation to the Severn Estuary site and Rodborough Common SAC, which are currently being finalised.</p>	<p>Delivery Policy ES6 specifies that development that will adversely affect international or nationally important habitats of principal importance will not be considered sustainable development and will not be permitted.</p> <p>The supporting text to the policy specifically references the mitigation strategies being operated on the Rodborough Common SAC and the Severn Estuary SAC, SPA and Ramsar together with the identified measures that will now be required for the Cotswolds Beechwoods SAC over the Local Plan period, to ensure no adverse effect occurs on the SAC due to the expected population increase in the County and the associated increase in recreational activity.</p>
<p>Policy ES6 could better reflect the guidance regarding biodiversity net gain requirements, as at present this requirement is only alluded to in the introductory text for the policy.</p>	<p>The policy wording of Delivery Policy ES6 in the Pre-submission Plan has been amended to include an explicit requirement for development proposals to provide a minimum 10% net gain in biodiversity</p>

## Mitigation

- 6.86 The Pre-submission Draft Local Plan supports a high level of development over the plan period. As this chapter describes, alongside many positive effects, a number of potential negative effects arising from this new development have been identified in relation to many of the SA objectives. The SEA Regulations advocate an approach that negative effects should be addressed in line with the mitigation hierarchy: avoid effects where possible, reduce the extent or magnitude of effects, then seek to mitigate any remaining effects.
- 6.87 **Table 6.5** summarises the key policies of the Pre-submission Draft Local Plan which could mitigate potential negative effects of delivering a high level of growth over the plan period in relation to each of the SA objectives.

**Table 6.5 Pre-submission Draft Local Plan policies that would contribute to the mitigation of negative effects identified**

SA Objective	Mitigation provided by Pre-submission Draft Local Plan policies
SA 1: Housing	<p>Policies <b>CP2: Strategic growth and development locations</b>; <b>CP3: Settlement Hierarchy</b>; and <b>DHC2: Sustainable Rural Communities</b> set out the necessary principles for the development of housing at appropriate locations in the District to meet local needs.</p> <p>Policies <b>DCP2: Supporting Older People and People with Mobility Issues</b>; <b>DHC4: Community-led housing</b>; <b>CP7: Inclusive communities</b>; <b>CP8: New Housing Development</b>; <b>CP9: Affordable Housing</b>; <b>DHC1: Meeting housing need within defined settlements</b>; <b>HC2: Providing new homes above shops in our town centres</b>; <b>HC3: Self-build and Custom Build Housing Provision</b>; <b>HC4: Local housing need (exception sites)</b>; and <b>HC7: Annexes for dependents or carers</b> are likely to help contribute to delivering a sufficient mix of homes (including affordable homes) that addresses a variety of needs in the long term in the District.</p> <p>Policies <b>HC1: Detailed Criteria for New Housing Developments</b>; <b>HC6: Residential Sub-Division of Dwellings</b>; and <b>HC8: Extensions to Dwellings</b> support appropriate extensions to existing properties in Stroud to allow for the adaptability of homes and help ensure that new housing development is appropriately designed to meet the needs of the District.</p>
SA 2: Health	<p>Policies <b>DHC5: Wellbeing and Healthy Communities</b>; <b>DHC6: Protection of Existing Open Spaces and Built and Indoor Sports Facilities</b>; <b>DHC7: Provision of New Open Space and Built and Indoor Sport Facilities</b>; <b>EI11: Providing Sport, Leisure, Recreation and Cultural Facilities</b>; <b>EI12: Promoting transport choice and accessibility</b>; <b>EI13: Protecting and extending our walking and cycling routes</b> <b>ES3: Maintaining Quality of Life Within our Environmental Limits</b>; and <b>DES2: Green Infrastructure</b> all seek to ensure that the health of the District's communities are promoted by maintaining a healthy and safe living environment and encouraging healthier lifestyle choices. They are also likely to help promote opportunities for increased levels of physical activity, including through the uptake of active modes of travel. These policies are also likely to help ensure that local communities are supported by the necessary infrastructure and accessible health care services.</p>
SA 3: Social inclusion	<p>Policies <b>DCP2: Supporting Older People and People with Mobility Issues</b>; <b>CP7: Inclusive Communities</b>; <b>CP10: Gypsy, Traveller and Travelling Showpeople Sites</b>; <b>DHC4: Community-Led Housing</b>; <b>EI11: Providing Sport, Leisure, Recreation and Cultural Facilities</b>; are expected to contribute to ensuring that development is supported by services and infrastructure that will help to reduce the potential for social isolation in Stroud District. These policies will also help to provide development to address the needs of needs of groups of specific portions of the local population.</p>
SA 4: Crime	<p>Policies <b>CP4: Place Making</b>; <b>CP14: High Quality Sustainable Development</b>; <b>ES3: Maintaining Quality of Life Within Our Environmental Limits</b>; and <b>ES12: Better Design of Places</b> are all expected to contribute to creating well designed and safe environments within the District where there is reduced potential for the incidences and fear of crime.</p>
SA 5: Vibrant communities	<p>Policies <b>CP4: Place Making</b>; <b>CP7: Inclusive Communities</b>; <b>DHC4: Community-Led Housing</b>; <b>DHC5: Wellbeing and Healthy Communities</b>; <b>HC1: Detailed Criteria for New Housing Developments</b>; <b>EI6: Protecting Individual and Village Shops, Public Houses and Other Community Uses</b>; <b>EI11: Providing Sport, Leisure, Recreation and Cultural Facilities</b>; <b>ES12: Better Design of Places</b>; and <b>ES16: Public Art Contributions</b> are all expected to work towards improving the satisfaction of people in the District as a place to live by supporting the delivery of high quality</p>

SA Objective	Mitigation provided by Pre-submission Draft Local Plan policies
	development and community services and facilities to foster more vibrant communities in the District. Several of the policies would also help to contribute to improving the aesthetic of the District as well as protecting residential amenity.
SA 6: Services and facilities	<p><b>DHC5: Wellbeing and healthy communities; DHC6: Protection of existing open spaces and built indoor sports facilities; DHC7: Provision of new open space and built and indoor sports facilities; EI6: Protecting individual and village shops, public houses and other community uses; and EI11: Providing sport, leisure, recreation and cultural facilities</b>, seek to ensure that a sufficient level of community facilities is provided to support growth in the District, as well as protecting and enhancing existing facilities.</p> <p>Policies <b>CP3: Settlement Hierarchy</b>; Policies <b>CP4: Place making; CP5: Environmental development principles for strategic sites; EI12: Promoting transport choice and accessibility; EI13: Protecting and extending our walking and cycling routes; and EI16: Provision of public transport facilities</b> seek to ensure that new development is provided at locations where services and facilities are accessible and would also support sustainable transport provisions to allow for improved accessibility to these types of provisions.</p>
SA 7: Biodiversity/geodiversity	Policies <b>ES6: Providing for biodiversity and geodiversity; ES8: Trees, hedgerows and woodlands; and DES2: Green Infrastructure</b> will help to ensure the protection of the District’s ecological assets by requiring that development proposals provide a net gain in biodiversity and by preventing harm relating to designated biodiversity sites. In general, it is expected that these policies would help to prevent potential habitat loss and disturbance and fragmentation of important ecological features. These policies will also seek to appropriately enhance the value, functionality, and connectivity of these features.
SA 8: Landscapes/townscapes	Policies <b>ES7: Landscape character; ES8: Trees, hedgerows and woodlands and ES12: Better design of places</b> require development proposals to consider the special features and landscape character of the District (including that of the Cotswolds AONB). These policies will help to ensure that buildings are appropriately designed, and that landscaping is sensitive to the local landscape character.
SA 9: Historic environment	Policies <b>ES7: Landscape character; ES10: Valuing our historic environment and assets; and ES12: Better design of places</b> seek to protect and conserve historic and cultural features in the District, as well as locally distinctive landmark features. Development is also required to be well designed to be sensitive to the local context. Where appropriate, development proposals that enhance the District’s heritage assets will be supported.
SA 10: Air quality	<p>Policies <b>DCP1: Delivering Carbon Neutral by 2030; ES1: Sustainable construction design; ES3: Maintaining quality of life within our environmental limits; ES2: Renewable or low carbon energy generation; and ES5: Air quality</b>, will help to improve the air quality in the District by encouraging energy generation from alternative sources and high quality design which promotes energy efficiency at new developments. These policies are also expected to help limit the potential for air pollution to be exacerbated through the scale, nature or location of new development.</p> <p>Policies <b>EI12: Promoting transport choice and accessibility, EI13: protecting and extending our walking and cycling route and EI16: Provision of public transport facilities</b>, will help to promote modal shift in Stroud District as well as helping to prevent growth in traffic volume, particularly by private vehicle. This approach is likely to help limit air pollution resulting as new growth occurs in the plan area.</p>
SA 11: Water quality	Policies <b>CP14: High quality sustainable development; ES1: Sustainable construction design; ES3: Maintaining quality of life within our environmental limits and ES4: Water resources, quality and flood risk</b> seek to minimise

SA Objective	Mitigation provided by Pre-submission Draft Local Plan policies
	<p>the potential for adverse effects on the quality and quantity of local water bodies as a result of development proposals, as well as conserving and enhancing the ecological flood storage value of the water environment.</p> <p>These policies will also help to ensure more efficient of water use and recycling of water resources in new development.</p>
SA 12: Flooding	<p>Policies <b>CP14: High quality sustainable development; ES1: Sustainable construction and design; ES3: Maintaining quality of life within our environmental limits;</b> and <b>ES4: Water resources, quality and flood risk</b> seek to reduce the causes and impacts of flooding by ensuring that new development minimises its vulnerability to flooding and implements measures to maximise future flood resilience. Proposals for development should also be considerate of the sequential test and the "Exception Test" where necessary and will incorporate SuDS thereby limiting the delivery of vulnerable development in high risk areas and requiring that measures to ensure risk of flooding is not increased.</p>
SA 13: Efficient land use	<p>Policies <b>CP3: Settlement Hierarchy; EI2: Regenerating existing employment sites; EI4: Development at existing employment sites in the countryside;</b> and <b>CP14: High quality sustainable development</b> seek to promote development on previously developed brownfield land, either by the regeneration of existing sites or the adaptation of existing buildings. This approach is considered to help contribute to more efficient land use in the District.</p>
SA 14: Climate change	<p>Policies <b>DCP1: Delivering Carbon Neutral by 2030; EI12: Promoting transport choice and accessibility; EI16: Provision of public transport facilities; ES1: Sustainable construction and design; ES2: Renewable or low carbon energy generation;</b> and <b>DES3: Heat supply</b> all aim to reduce carbon emissions through the promotion of more sustainable modes of transport, the recycling of waste and water, encouraging more efficient building design and the use of energy from renewable sources. These policies also seek to reduce the vulnerability of new development to impacts caused by future climate change such as flooding.</p> <p>Policies <b>ES6: Providing for biodiversity and geodiversity</b> and <b>DES2: Green infrastructure</b> seek to enhance biodiversity value in the District by ensuring a net gain in biodiversity, and therefore mitigate the potential loss of biodiversity caused by climate change. The maintenance of areas of open space as part of the green infrastructure network will also help to promote climate change mitigation and adaptation by allowing for areas which act to sequester carbon and helping to limit the potential for the heat island effect and the proliferation of impermeable surfaces which might increase flood risk.</p>
SA 15: Waste	<p>Policies <b>ES1: Sustainable construction and design; ES4: Water resources, quality and flood risk; CP5: Environmental development principles for strategic sites;</b> and <b>CP14: High quality sustainable development</b> seek to ensure that new development maximises the recycling of any waste generated during construction and operation, promote the recycling of grey water and seek to minimise generation of waste.</p>
SA 16: Employment	<p>Policies <b>CP11: New employment development; EI1: Key employment sites; EI2: Regenerating existing employment sites; EI2a: Former Berkeley Power Station;</b> and <b>EI4: Development at existing employment sites in the countryside</b> all contribute to the increased provision of employment opportunities at sustainable locations by supporting the allocation of sites for new employment development and protecting the against the regeneration of existing viable employment sites for other uses.</p>
SA 17: Economic growth	<p>Policies <b>CP11: New employment development; CP13: Demand management and sustainable travel measures; EI1: Key employment sites; EI5: Farm and forestry enterprise diversification; Delivery Policy EI7: Non-retail</b></p>

SA Objective	Mitigation provided by Pre-submission Draft Local Plan policies
	<p><b>uses in primary frontages; EI8: Non-retail uses in secondary frontages; EI10: Provision of new tourism opportunities; EI12: Promoting transport choice and accessibility and EI13: Protecting and extending our walking and cycling routes</b> are expected to help ensure that there is sufficient space for economic growth in the District and that infrastructure which enables sustainable economic growth, such as transport provisions and high speed broadband is supported. These policies are also likely to help ensure that town centres in the District remain viability and continue to attract appropriate levels of footfall and that the rural economy and tourism are sufficiently supported.</p>

## 7 Monitoring

- 7.1 The SEA Regulations require that *“the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”* and that the environmental report should provide information on *“a description of the measures envisaged concerning monitoring”*. Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.
- 7.2 Monitoring should be focused on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. In line with a precautionary approach, those SA objectives against which no significant adverse effects have been identified but uncertainty is recorded have been included in the monitoring framework. Significant adverse effects and/or uncertain effects have been identified against all SA objectives apart from SA objectives 3: **social inclusion** and 4: **crime**.
- 7.3 **Table 7.1** overleaf sets out a number of suggested indicators for monitoring the potential sustainability effects of the Pre-submission Draft Local Plan. Where possible, this draws from the proposed monitoring framework for the adopted Stroud District Local Plan (2015) that has been prepared by Stroud District Council. Monitoring indicators have been updated to take account of representations received relating to this topic as part of the consultation undertaken on the SA Scoping Report and those for the SA report for the Emerging Strategy Paper. Note that the indicators proposed are included as suggestions at this stage may change when Stroud District Council prepares its monitoring framework for the Local Plan Review. The Council is to prepare a monitoring framework to assess the performance of the Local Plan over its course up to 2040. It is also to publish regular monitoring reports to identify progress with the Local Plan.
- 7.4 The data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations (e.g. the Environment Agency) can also be used as a source of indicators. It is therefore recommended that the Council continues the dialogue with statutory environmental consultees and other stakeholders that has already been commenced, and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

**Table 7.1 Proposed Monitoring Framework for the Stroud District Local Plan Review – Pre-submission Draft Local Plan**

<b>SA objectives</b>	<b>Proposed monitoring indicators</b>
<p><b>Housing</b> SA 1: To provide affordable, sustainable and decent housing to meet local needs.</p>	<ul style="list-style-type: none"> <li>• Net additional dwellings (also considered as a percentage of net dwellings required).</li> <li>• Percentage of Affordable housing.</li> <li>• Percentage reduction of unfit/non-decent homes.</li> <li>• Net additional transit and residential pitches (gypsy, traveller and travelling showpeople) permitted and completed to meet identified requirement.</li> <li>• Number of small scale housing applications permitted.</li> <li>• Quantum of new self build housing.</li> <li>• Number of permitted schemes for rural housing.</li> <li>• Net additional care home bed spaces.</li> <li>• Gross completions by dwelling type and size.</li> <li>• Total windfalls from previous year.</li> <li>• Percentage of windfall allowance completed.</li> </ul>
<p><b>Health</b> SA 2: To maintain and improve the community’s health with accessible healthcare for residents, including increasing levels of physical activity, especially among the young.</p>	<ul style="list-style-type: none"> <li>• Capacity of health services.</li> <li>• Percentage of people who regularly take 30 minutes exercise more than three times a week.</li> <li>• Number of playgrounds to NPFA standard.</li> <li>• Health inequality indicators.</li> <li>• Net change in floorspace of sports centres.</li> <li>• Quantity of public open space lost.</li> <li>• Quantity of public open space provided.</li> <li>• Percentage of the city's population having access to a natural greenspace within 400 metres of their home.</li> <li>• Length of greenways constructed.</li> <li>• Hectares of accessible open space per 1,000 population.</li> </ul>
<p><b>Vibrant Communities</b> SA 5: To create and sustain vibrant communities.</p>	<ul style="list-style-type: none"> <li>• Percentage of new development built on previously developed land (brownfield completions).</li> <li>• Proportion of vacant shops in all identified centres.</li> </ul>
<p><b>Services and Facilities</b> SA 6: To maintain and improve access to all services and facilities.</p>	<ul style="list-style-type: none"> <li>• Number of libraries per 1,000 people.</li> <li>• Number of visits to libraries in Stroud District per annum.</li> <li>• Number of visits to leisure facilities in Stroud District per annum.</li> <li>• Quantity of community facilities lost through development.</li> <li>• Quantity of new community facilities.</li> <li>• Net change in floorspace of cultural uses in the town centres.</li> </ul>

SA objectives	Proposed monitoring indicators
<p><b>Biodiversity/Geodiversity</b> SA 7: To create, protect, enhance, restore and connect habitats, species and/or sites of biodiversity or geological interest.</p>	<ul style="list-style-type: none"> <li>• Number of planning applications involving a BAP habitat being created or managed as a result of new development.</li> <li>• Number of trees with preservation orders in place.</li> <li>• Number of planning applications with conditions to ensure works to manage or enhance the condition of SSSI features of interest.</li> <li>• Percentage area of SSSIs in adverse condition as a result of development.</li> <li>• Percentage of granted planning permissions within areas of biodiversity and geodiversity value.</li> <li>• Area of net biodiversity gain.</li> <li>• Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.</li> <li>• Percentage of major developments generating overall biodiversity enhancement.</li> <li>• Hectares of biodiversity habitat delivered through strategic site allocations.</li> </ul>
<p><b>Landscapes/Townscapes</b> SA 8: To conserve and enhance the local character and distinctiveness of landscapes and townscapes and provide sustainable access to countryside in the District.</p>	<ul style="list-style-type: none"> <li>• Percentage of development approved in areas where there is a need to take account of landscape character.</li> <li>• Number of applications permitted within the AONB.</li> <li>• Amount of new development in AONB with commentary on likely impact.</li> </ul>
<p><b>Historic Environment</b> SA 9: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment.</p>	<ul style="list-style-type: none"> <li>• Number of Listed Buildings (all grades) in the district.</li> <li>• Number and percentage of Listed Buildings at Risk (all grades).</li> <li>• Number of listed buildings.</li> <li>• Number of non-designated heritage assets (these can be, but are not always, "locally listed").</li> <li>• Number of conservation areas with an up to date appraisal and heritage at risk survey.</li> <li>• Number of instances of substantial harm to non-designated heritage assets.</li> <li>• Amount of development permitted on land safeguarded for the canals.</li> <li>• Total distance (metres) of restored canal.</li> </ul>
<p><b>Air Quality</b> SA 10: To ensure that air quality continues to improve.</p>	<ul style="list-style-type: none"> <li>• Percentage of residents driving a car or van.</li> <li>• Percentage of trips made using walking or cycling.</li> <li>• Number of applications that do not provide a travel plans and / or transport assessment that is contrary to transport advice.</li> <li>• Percentage of new residential development within 800 metres of public transport facilities.</li> <li>• Number of applications located within 800 metres of a District, Local or Neighbourhood Centre.</li> <li>• Number of permitted schemes with accompanying public transport facilities included within 400 metres.</li> <li>• Level of air pollution recorded through Air Quality Strategy.</li> </ul>



SA objectives	Proposed monitoring indicators
<p><b>Water Quality</b> SA 11: To maintain and enhance the quality of ground and surface waters and to achieve sustainable water resources management in the District.</p>	<ul style="list-style-type: none"> <li>Percentage increase in use of recycled water.</li> <li>Number of developments in Drinking Water Safeguarding Zones and Source Protection Zones.</li> <li>Number of planning permissions granted contrary to the advice of the Environment Agency on water quality grounds.</li> <li>Percentage of the District's main water bodies achieving 'good' status.</li> </ul>
<p><b>Flooding</b> SA 12: To manage and reduce the risk of flooding and resulting detriment to public wellbeing, the economy and the environment.</p>	<ul style="list-style-type: none"> <li>Number of planning permissions granted contrary to the advice of the Environment Agency on flood risk grounds.</li> <li>Permissions granted contrary to the advice of the Lead Local Flood Authority.</li> </ul>
<p><b>Efficient Land Use</b> SA 13: To improve efficiency in land use and protection of soil quality through the re-use of previously developed land and existing buildings and encouraging urban renaissance.</p>	<ul style="list-style-type: none"> <li>Percentage of new development built on previously developed land (brownfield completions).</li> <li>Percentage of greenfield development completions.</li> <li>Percentage of dwellings completed at between 30 and 50 dwellings per hectare.</li> <li>Percentage of new development at Tier 1 settlements.</li> </ul>
<p><b>Climate Change</b> SA 14: To implement strategies that help mitigate global warming by actively reducing greenhouse gases and adapt to unavoidable climate change within the District.</p>	<ul style="list-style-type: none"> <li>Percentage of buildings classed A-C in energy efficiency.</li> <li>Number of renewable energy developments.</li> <li>Renewable energy capacity installed (by type) (measured in kW).</li> <li>Percentage of trips made using green modes of transport.</li> </ul>
<p><b>Waste</b> SA 15: To minimise the amount of waste produced, maximise the amount that is reused or recycled, and seek to recover energy from the largest proportion of the residual material, and achieve the sustainable management of waste.</p>	<ul style="list-style-type: none"> <li>Amounts of household, construction and demolition and commercial and industrial waste produced.</li> <li>Percentage increase in waste recycled.</li> <li>Percentage reduction in production of hazardous waste.</li> </ul>
<p><b>Employment</b> SA 16: To deliver, maintain and enhance sustainable and diverse employment opportunities, to meet both current and future needs.</p>	<ul style="list-style-type: none"> <li>Net employment land gain.</li> <li>Loss of employment floorspace.</li> <li>Percentage increase in employment.</li> <li>Amount of new employment floorspace within identified employment areas.</li> <li>Number of business registrations and de-registrations.</li> <li>Quantum of land developed by employment type and location.</li> <li>Quantum of employment land lost to non-employment development.</li> <li>Quantum of land developed by employment type and location (key employment areas).</li> </ul>

SA objectives	Proposed monitoring indicators
<p><b>Economic</b></p> <p>SA 17: To allow for sustainable economic growth within environmental limits and innovation, an educated/ skilled workforce and support the long term competitiveness of the District.</p>	<ul style="list-style-type: none"> <li>• Increase in GVA of the region.</li> <li>• Increase in investment in region.</li> <li>• Increase in education facilities in region.</li> <li>• The percentage of young people aged 16 to 18 not in education, training or employment.</li> <li>• Proportion of vacant shops in all centres.</li> <li>• Number of non-retail uses on primary &amp; secondary frontages.</li> <li>• Percentage class A1 retail use in primary frontage.</li> <li>• Percentage class A1 retail use in secondary frontage.</li> <li>• Number of applications granted contrary to advice in relation to retail impact assessment.</li> <li>• Holiday Home completions.</li> </ul>

## 8 Conclusions

- 8.1 This report has considered the sustainability implications of the policies and sites presented in the Stroud District Pre-submission Draft Local Plan. Alongside these, reasonable alternative policy and site options have also been appraised.
- 8.2 The plan area is mostly rural in character and contains areas of high value landscapes. This includes areas which fall within the designated landscape of the Cotswolds AONB. The focus of services and facilities as well as jobs is found mainly within the Tier 1 main settlements of Stroud and Stonehouse towards the central portion of the District and Cam and Dursley to the south. Below these settlements, the Tier 2 local service centres provide residents with comparatively more limited but still relatively good access to services and facilities and jobs. Residents in the north of the District benefit from nearby access to Gloucester city, which acts as a major strategic provider for services and facilities and jobs. Southern parts of the District benefit from links with Bristol city and South Gloucestershire to meet the needs of the communities in these locations. The existing strategic road network allows for access from the District towards Gloucester city to the north and Bristol city and South Gloucestershire to the south via the A38 and M5. Rail access in the District is limited to the settlements of Cam and Dursley, Stonehouse and Stroud. Cam and Dursley lie on the Bristol-Birmingham main railway line, while Stonehouse and Stroud lie on the Gloucester-London main railway line. Sustainable transport options away from these larger settlements are more limited.
- 8.3 The District benefits from a range of ecologically important features. International sites including the Severn Estuary SPA, SAC and Ramsar site, Rodborough Common SAC and Cotswold Beechwoods SAC all lie within the boundaries of Stroud District. Catchment zones have been established around Rodborough Common SAC (3.0km), Severn Estuary SAC/SPA/Ramsar site (7.7km) and Cotswold Beechwoods SAC (15.4km). Within these parts of the District, development that would deliver new homes could result in increased recreational pressures on these designated sites.
- 8.4 Key issues which development in the District will be required to address include the affordability of local housing, delivering development in a highly rural District in a manner which can limit the need to travel longer distances and limiting impacts on higher value landscape and biodiversity. New development in the plan area will also be required to address climate change mitigation and the implications of climate change. The plan is set out to be in line with the Council's declaration to make Stroud District carbon neutral by 2030. Increased uncertainty and impacts relating to Brexit and COVID-19 may also have longer implications in terms of economic and housing growth as well as commuting patterns in the area. This includes the implications of the potential for a longer-term shift towards rising levels of home working which has been evident during the COVID-19 pandemic.
- 8.5 The plan sets out a growth strategy for the District up to 2040. A level of housing growth to meet the Government's standard method for housing delivery for the District (630 homes per year) is provided for. In total over the 20 year plan period, 12,600 new homes will be provided. This includes some homes which already have planning permission and other which are assumed to be firm commitments to be developed up to 2040. The figure represents a 40% increase from the figure in the adopted 2015 Local Plan of 456 homes per year. This level of housing is expected to help achieve the step change in housing delivery required by Government and support a more affordable housing stock for local people. The plan also safeguards land at Whaddon to meet the future housing needs of neighbouring Gloucester City should it be required in accordance with the development strategy for the JCS area
- 8.6 The plan also supports the delivery of a range of housing types, including affordable homes and homes for older people which will be of particular importance given the national and District trend towards an older population. A commitment to ensure a five year land supply for deliverable Gypsy and Traveller sites is also included in the plan to meet the accommodation needs of this group.

- 8.7 A total of 79ha of new employment land is allocated in the plan to support the growth of the local economy. Much of this is well related to the existing larger settlements in the plan area or areas immediately surrounding, or areas where large scale housing development is to be delivered over the plan period. This approach is expected to support a degree of self-containment in the plan area. Furthermore, much of the employment land allocated benefits from access to the strategic road network in the plan or is within key employment property market areas. While the good level of access to the strategic road network from these locations may result in increased potential for journeys to be made by car and associated levels of air pollutants and greenhouse gases, these locations are likely to be attractive to potential investors.
- 8.8 A number of options for the plan's growth strategy have been tested through the SA. Alongside the findings of other evidence base studies, this work has been used by the Council to inform its decision to take forward a hybrid approach to the distribution of development. This includes larger strategic sites, which will extend existing larger settlements, two new settlements at Sharpness and Wisloe and local development sites at accessible local settlements and other development broadly in line with the settlement hierarchy. In order to support smaller rural communities, the strategy provides flexibility for small scale development adjacent to settlement developments to meet identified local needs where supported by local communities. It is expected that this approach would make good use of the existing services and facilities, employment opportunities and sustainable transport links in the plan area. The delivery of a more limited level of development at smaller settlements will help to ensure the viability of local services and facilities at these locations to help ensure that residents can meet some of their needs locally.
- 8.9 The larger strategic sites (most notably the new settlement sites) are of a scale to support substantial new service provision in the plan area. These strategic sites also will enable improvements to the sustainable transport network in the plan area. Notably, measures that would support railway improvements are required through the site allocation policies at the Hunts Grove Extension, Stonehouse North West Extension and new Sharpness settlement. The new settlements at Sharpness and Wisloe are also to incorporate small scale carbon energy generation which will help to limit the contribution these developments make to the District's carbon emissions. Furthermore, the new Sharpness settlement will provide a long-term focus for housing growth in the plan area. The allocation of this site will allow for the delivery of 2,400 dwellings and associated uses by 2040 and a total of 5,000 dwellings by 2050 subject to Local Plan Review.
- 8.10 While much of the District is rural with access to services and facilities more limited in places, the approach to the distribution of development is expected to help reduce reliance on the private vehicle. By providing much of the development at the larger settlements, access to services and facilities which benefit public health will also be supported. At the new settlements, access to services and facilities will be greatly dependent upon the timing of new service provision and earlier occupiers of the Wisloe and Sharpness new settlements may have to travel longer distances for certain needs. Through the growth strategy there could also be implications in terms of landscape character given the high level of greenfield land required and that some of the sites lie in close proximity to the AONB and/or have been identified through the Landscape Sensitivity Assessment (2016) as having medium/high or high sensitivity<sup>75</sup> for development. Furthermore, a number of the sites were identified through the heritage impact work undertaken to support the Council's SALA as having potential for impacts on historic assets or their settings, prior to mitigation.
- 8.11 The delivery of new development in the plan area is also likely to result in increased habitat disturbance, fragmentation and loss. There is potential for increased pressures as a result of activities associated with construction and site occupation on designated and undesignated sites which are of importance to wildlife. The close proximity of the Sharpness new settlement to the Severn Estuary could pose particular issues in terms of water resources as well as recreational pressures. The site allocation policy for the new settlement seeks to mitigate the effects of recreational pressure through the provision of suitable alternative natural greenspace (SANG) and other mitigation measures to help absorb human recreational activity which might otherwise affect the Estuary site. Many sites also fall within the zones of influence established around the Rodborough Common SAC and Cotswold Beechwoods SAC meaning there is increased potential

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<sup>75</sup> Or through the Gloucestershire Strategic Development Opportunities (2019) assessment as having moderate-high or high sensitivity to development

for recreational impacts at these sites as result of development. The HRA screening work undertaken for the plan identified the potential for significant effects on Severn Estuary SAC/SPA/Ramsar, Rodborough Common SAC and Cotswolds Beechwoods SAC. However, the potential for most of the types of effects identified as a result of development set out in the plan to adversely affect the integrity of each of these European sites was ruled out through the appropriate assessment when considering in the policy requirements in the Pre-submission Draft Local Plan. The appropriate assessment also considered the findings of traffic modelling work undertaken.

- 8.12 Delivery Policy ES6: Providing for biodiversity and geodiversity in the Pre-submission Draft Local Plan sets out that in addition to the Mitigation Strategies being operated on the Rodborough Common SAC and the Severn Estuary SAC, SPA and Ramsar development proposals that could affect the Cotswold Beechwoods SAC will be required to contribute to mitigation measures. The initiatives will be funded principally through S106 contributions that contribute towards an agreed SAC Avoidance and Mitigation Strategy. Developments that are supported by specific measures to avoid and mitigate impacts upon the SAC or SPA, the District Council will undertake an Appropriate Assessment.
- 8.13 To help ensure the mitigation of the potential adverse impacts of development, the plan includes a number of additional topic-based policies in addition to site specific policy requirements. These include the requirement for development to achieve a minimum of 10% biodiversity net gain and the incorporation of measures to contribute to making the District carbon neutral by 2030. Specific policy support is included for decentralised renewable and low carbon energy schemes. Policies are also included to protect local air quality and limit other forms of pollution, prevent increases in flood risk and preserve the historic environment and landscape character. This includes protection for the individual identity of settlements and quality of the countryside as well as the natural and special character of the Cotswolds AONB.
- 8.14 The likely cumulative sustainability effects of the Pre-submission Draft Local Plan are described in **Chapter 6** of this report. Potentially significant positive cumulative effects were identified in relation to SA objectives 1: **housing**, 6: **services and facilities**, 14: **climate change**, 16: **employment** and 17: **economic growth**. For SA objectives 14: climate change and 16: employment it is expected that the significant positive effect identified would be in combination with a minor negative effect for an overall mixed cumulative effect. Potentially significant negative cumulative effects were identified in relation to SA objective 7: **biodiversity/geodiversity**, 8: **landscape/townscape**, 11: **water quality** and 13: **efficient land use**, in combination with a minor positive effect for an overall mixed cumulative effect.
- 8.15 In all, the Pre-Submission Draft Local Plan sets out an approach to accommodate a relatively high level of housing growth to meet local needs. This delivery is expected to benefit housing affordability which is a long-term problem for the District. Allowing for a range of housing types is also expected to help meet the needs of a changing local population given the increasing number of older people in the area. A suitable level of employment growth is also supported, and development is to be delivered in a distribution that will allow for the incorporation of new services and facilities. In this way the plan will help to promote a degree of self-containment in the District and its settlements. The rural nature of the District and lack of service provision in some locations, however, will mean that promoting a move away from reliance on the private vehicle is likely to prove challenging. Additional challenges relate to the potential impacts of development on landscape character and biodiversity as well as those relating to the historic environment. The multiple landscape, biodiversity and heritage features of value in the plan area will make it difficult to avoid all adverse effects. The plan has incorporated policy safeguards which will reduce the significance of the adverse effects expected. Considering all elements of the plan, a positive approach to delivering a sustainable form of development is detailed and this will help meet the needs of the local community up to 2040.

## Next steps

- 8.16 This SA Report will be available for consultation alongside the Pre-submission Draft Local Plan between 26<sup>th</sup> May and 7<sup>th</sup> July 2021. Following this consultation, the Local Plan and accompanying SA Report will be submitted to the Secretary of State for public examination. Any proposed

modifications to the Submission version of the Local Plan arising out of this process may require SA, which will be consulted upon, as necessary.

LUC

May 2021