

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

between

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

February 2023

1. Introduction and background

- 1.1 A Gloucestershire Statement of Common Ground (GSoCG) covering agreements on various strategic planning matters has been prepared and approved by the seven local authorities in Gloucestershire and GFirstLEP. The GSoCG provides for additional or supplementary Statements of Common Ground to be prepared by participating local authorities, particularly within the context of emerging local plans.
- 1.2 This additional Statement of Common Ground (SoCG) covering strategic housing matters has been prepared to support the examination of the Stroud District Local Plan Review (2020-2040), and has been signed by Cheltenham Borough Council, Cotswold District Council, Forest of Dean District Council, Gloucester City Council, Stroud District Council and Tewkesbury Borough Council, referred to hereafter as ‘the parties’. Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council were previously known as the Joint Core Strategy (JCS) authorities and are now collectively known as ‘the Joint Strategic Plan (JSP) authorities’.
- 1.3 A separate SoCG between the parties relating to Gypsy, Traveller and Travelling Showpeople matters was approved in May 2021 and submitted with the plan. However, this has been updated in light of the recent completion of the Gloucestershire Gypsy and Traveller Accommodation Assessment 2022.

2. Strategic matters that are agreed

Context and actions taken to date

- 2.1 The National Planning Policy Framework (NPPF) requires strategic policies relating to housing to be informed by the production of a local housing needs assessment. This should determine the minimum number of homes needed using the standard method and the size, type and tenure of housing needed (NPPF, para. 61-62).
- 2.2 In 2018 the parties, with Gloucestershire County Council, jointly commissioned consultants to complete a Gloucestershire Local Housing Needs Assessment (LHNA) for the Gloucestershire Housing Market Area. A final report was published in September 2020. The LHNA adheres to the requirements of the NPPF and the associated planning practice guidance.

- 2.3 The report concludes, based on a range of indicators, that Gloucestershire forms a single housing market area (HMA). Whilst this does not preclude overlap occurring with neighbouring HMAs, from an administrative point of view, the parties form the most appropriate grouping.
- 2.4 The principal duty to co-operate issue surrounding housing provision within Gloucestershire is related to meeting the needs arising within Gloucester City and Cheltenham Borough. It is recognised that these settlements have a limited capacity to accommodate needs within existing boundaries and that, depending upon the scale of future needs and the availability of land, development may need to be located within adjoining authority areas.
- 2.5 A Statement of Cooperation was drafted by Stroud District Council in 2013 and agreed in 2014 between Stroud District Council and the JCS authorities to set out the process and triggers by which any unmet objectively assessed needs arising from within their administrative areas could be considered through a review of the Joint Core Strategy (JCS) and the Stroud District Local Plan.
- 2.6 Subsequently the adopted Stroud District Local Plan included within Core Policy 2 a commitment to give “due consideration to the need to assist other local planning authorities in this housing market area in meeting their unmet objectively assessed development and infrastructure needs, including through an early review of this Local Plan, to ensure that any shortfalls that may arise in the delivery of housing and employment growth (as identified through the other authority’s local plan process) are provided for in sustainable locations.” In the light of these unmet needs, the District Council decided to commence an early review of the Stroud District Local Plan in 2017.
- 2.7 In December 2017, the Gloucester, Cheltenham and Tewkesbury Core Strategy (JCS) was adopted. The JCS recognises that “Gloucester has a good supply of land for the short to medium term that will enable it to meet its requirements to at least 2028/9. This will allow adequate time for an early review of the plan to explore further the potential to meet Gloucester’s needs in the longer term towards the end of the plan period. This would allow the consideration of additional development options that may become available, both within and outside the JCS area. This could include the unlocking of further development opportunities within the urban area, as well as potential new urban extensions in Tewkesbury Borough and Stroud District or elsewhere in the housing market area.” (JCS, para. 3.2.16)
- 2.8 In December 2018 Cheltenham Borough, Forest of Dean District, Gloucester City, Stroud District and Tewkesbury Borough councils jointly commissioned an assessment to inform the search for suitable and available strategic development land beyond the existing settlement boundaries in the study area. The methodology for the study was developed through an iterative process with close ongoing liaison with Gloucestershire County Council and other statutory consultees. This was intended to inform local plan and JCS reviews and the preparation of an informal spatial framework for the whole of Gloucestershire in the longer term, but was also intended to consider the matter of accommodating Gloucester’s longer term housing needs and the Interim Report published in October 2019 was prepared specifically to address this issue.
- 2.9 The Interim Report identified 7 assessment areas as having the highest accessibility to Gloucester (1 area within Gloucester, 3 areas within Stroud and 3 areas within Tewkesbury) and an additional 3 areas (all within Tewkesbury) that currently have lower accessibility to

Gloucester but which may be able to be improved and achieve similar accessibility levels to those outlined above, following investment associated with potential development.

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

Commitments for future work and collaboration

- 2.15 As mentioned in paragraph 1.2, the JCS is now called the Gloucester, Cheltenham and Tewkesbury Joint Strategic Plan (JSP). Rather than a partial review, the scope of the review will be comprehensive and provide a full review/replacement of the plan.
- 2.16 The next stage in the JSP process is a Regulation 18 document, which will be published later in the year for public and stakeholder consultation. The document will consider growth options (how much development) and spatial options (the strategy for delivering growth in the most sustainable way) and other matters. Amongst other evidence documents, it will be accompanied by Urban Capacity Studies for Gloucester City and Cheltenham Borough, which will identify how much growth can realistically be accommodated in the administrative areas of these local authority areas. It is also necessary for the JSP authorities to update their Local Development Schemes, which will take place in the summer.
- 2.17 The JSP plan-making programmes don’t align with the Stroud District Local Plan examination. Therefore the parties agree to work together to explore options for releasing the site post adoption, if still required to meet a housing shortfall and if still the preferred sustainable location having considered all reasonable alternatives.

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

3. Matters that are not agreed

3.1 None

4. Signatories

Signed on behalf of Cheltenham Borough Council
Approval confirmed by email 23/02/23
.....

Signed on behalf of Cotswold District Council
Approved by email 17/02/23 [REDACTED] - Forward Planning Manager
.....

Signed on behalf of Forest of Dean District Council
Approved by email 17/02/23 [REDACTED] - Forward Planning Manager
.....

Signed on behalf of Gloucester City Council
Approval confirmed by email 23/02/23
.....

Signed on behalf of Stroud District Council



— Head of Planning Strategy and Economic Development

.....
Signed on behalf of Tewkesbury Borough Council
Approval confirmed by email 23/02/23

.....
Dated
27 February 2023