



**COTSWOLD**  
DISTRICT COUNCIL

## Response to the Stroud District Council Local Plan Review – Emerging Strategy Paper (Regulation 18) consultation

---

### **Q1.0a: Have we identified the top 5 issues for you?**

A1.0a. Agree GI should have a central role in the emerging strategy (2<sup>nd</sup> Issue)

### **Q1.0b Do you agree with the ways we intend to tackle these issues?**

A1.0b. No Comment

### **Q2.1a: Do you agree with the ways in which the emerging Strategy intends to support the local economy and the creation of jobs?**

A2.1a. As noted in Section 2.1, the Local Enterprise Partnership economic ambitions will be a key factor in establishing future needs. Cotswold District Council supports partnership and collaborative working across Gloucestershire to meet the economic needs and priorities of Gloucestershire.

### **Q2.1b: Do you support an alternative approach? Or have we missed anything?**

A2.1b. A key transport corridor linking Stroud District to Cotswold District is the A419, which links Cirencester and Stroud. Consideration should be given to the A417 missing link project and what, if any, the potential impact of altered traffic flows will have on the local highways network through Stroud.

### **Q2.2a Do you agree with the ways in which the emerging Strategy intends to support the District's town centres?**

A2.2a. It is accepted that planning policies should support town centres to evolve and adapt to future challenges and changing circumstances, so 'a more flexible planning framework' is welcomed. Cotswold District Council invites the Council to consider recommendations contained within the recent Grimsey Review 2 report and its principles for a thriving town centre.

### **Q2.2b: Do you support an alternative approach? Or have we missed anything?**

A2.2b. The new NPPF refers to primary shopping areas and town centres (para.85b).

### **Q2.3a: Do you agree with the ways in which the emerging Strategy intends to meet local housing need?**

A2.3a. Cotswold District Council supports Stroud District's commitment to meet its housing needs in full within its area.

**Q2.3b Do you support an alternative approach? Or have we missed anything?**

A2.3b. No comment.

**Q2.4a: Do you agree with the ways in which the emerging Strategy intends to protect existing or deliver new local green spaces and community facilities?**

A2.4a. Opportunities to enhance the GI network will help improve health and wellbeing of communities.

**Q2.4b: Do you support an alternative approach? Or have we missed anything?**

A2.4b. The Council's Local Plan review should be mindful of the Glover Review into protected (designated) landscapes, including AONBs and National Parks. Any change to the level of protection given to landscapes within the area, including the Wye Valley, the Forest of Dean and the Cotswolds could have implications, both directly in altering the degree to which these areas have to be taken into account in policy formulation and allocations within Stroud District itself and also indirectly as there may be an increased pressure to provide land, outside of protected landscapes, for development as part of duty to co-operate obligations.

**Q3.1a: Do you agree with the vision for 2040 as drafted?**

A3.1a. No comment.

**Q3.1b: Do you support an alternative approach? Or have we missed anything?**

A3.1b: All Councils have signed up to the GI Pledge for Gloucestershire. Cotswold District Council supports the Council to embed the pledge into its vision as well as informing the objectives of the strategy.

**Q3.2a: Do you agree with the Strategic Objectives as drafted?**

A3.2a. No comment

**Q3.2b: Do you support an alternative approach? Or have we missed anything?**

A3.2b. Consideration could also be given to the Gloucestershire County Council's emerging Joint Health and Wellbeing Strategy and supporting needs assessments.

**Q4.2a: Do you support the broad approach of the emerging growth strategy, in terms of distributing the growth required by national policy for Stroud District?**

A4.2a. As noted in 4.2 of the consultation document, the NPPF seeks a range of housing sites (para72) and recognises the role of small to medium sites. The proposal for some limited development '*immediately adjoining settlement development limits at Tier 1- 3 to meet specific identified local development needs*' (self or custom build for example) arguably makes the idea of a settlement limit a moot point. An allocated extension for a specific use with site specific criteria

based policy would be an alternative approach, if it could be safeguarded against predatory applications i.e. losing employment allocations to housing.

The emerging strategy is mindful of the potential role of Neighbourhood Planning in allocating additional sites to those in the Local Plan (tier 4 and 5) but could also mention/ consider its role in other settlements. The NPPF states NDP groups 'should consider a size of no larger than 1ha' (NPPF 68a, 69).

**Q4.2b Do you support an alternative strategy approach?**

No comment.

**Q4.2c Have we identified the right towns and villages for growth? Or do other settlements have growth potential?**

No comment.

**Q4.2d Do you support our approach to addressing Gloucester's housing needs?**

No comment.

**Q4.2e Do you support an alternative approach to addressing Gloucester's housing needs?**

No comment.

**Q4.3a: Are any of the settlements in the wrong tier and, if so, for what reason?**

No comment.

**Q4.3b: Do you support the proposed approach to managing development at small Tier 4 and 5 settlements by including them within the hierarchy and defining Settlement Development Limits? Or do you support an alternative approach of simply treating them as 'open countryside'? What are the pros and cons of either approach?**

A4.3b. All settlements can play a role in delivering sustainable development (NPPG). Settlement boundaries can help prevent development sprawl and safeguards land outside the boundary from development. An overarching methodology / approach would likely be required for consistency and settlements would need to be reviewed regularly to ensure they are in the most appropriate tier. Cotswold District Council does not employ a settlement hierarchy and instead identifies 17 settlements as the principal focus for development. Beyond these principal settlements, the Local Plan supports small scale development in non-principal settlements (policy DS3) however it restricts open market housing in the open countryside (policy DS4). Non-principal settlements do not have settlement boundaries and instead applications must adhere to criteria set out in policy DS3 and other relevant policies. This approach was tested at examination and was found to be sound. This approach does away with numerous tiers of settlement but still provides suitable flexibility to deliver small scale windfall development in the rural settlements.

**Q4.3c: Do you support the idea that the Local Plan should seek to manage the cumulative impacts of growth on individual settlements? How should we develop a policy framework to achieve this?**

A4.3c. Yes. Consideration of extant and expected planning permissions (perhaps the number of possible developable SALA sites) within the settlement strategy approach could be taken into account to manage cumulative impacts and an appropriate overall scale of growth at the settlement. Ensure that policy criteria will only support proposals where the impacts of development, including cumulatively, have all been considered and are likely to be or can be made acceptable in planning terms.

**Q4.4a. Do you support the emerging Strategy's approach towards maintaining settlement development limits?**

A4.4a. An overarching methodology / approach would be required for consistency.

The Sustainability Appraisal states '*one hybrid option could be a combination of removing settlement development limits for large settlements, but retaining them for small villages with few facilities in sensitive locations. This approach would have some of the more positive social and economic effects of Option 2, while still providing some of the environmental protection associated with retaining settlement development limits*'. Cotswold District Council's adopted Plan is based on a vice-versa approach, in that settlement development limits remain for more sustainable settlements, but not for smaller and more rural villages.

**Question 4.4b Or do you support an alternative approach?**

No comment.

**Question 4.4c Do you support the proposals to allow some limited development beyond settlement development limits? Question 4.4d Or do you support an alternative approach?**

No comment.

**Question 4.4e Do you support the specific changes to existing settlement development limits that are set out in Appendix A? (Please clearly specify which settlement(s) your comment(s) relate to, and use the map's boundary change reference where relevant).**

No comment.

**Question 4.4f Do you support any other changes to settlement development limits, not listed in Appendix A? Please specify.**

No comment.

**Question 5.0a Do you support the proposed mini-visions for your area(s)? (Please be clear and specific about which of the 8 mini-visions your comment(s) relate to).**

No comment.

**Question 5.0b Would you like to propose alternative wording for any of the mini-visions? (Please be clear and specific about which of the 8 mini-visions your comment(s) relate to).**

No comment.

**Question 5.0c Do you support the identified key issues and priorities for action for your area(s)? (Please be clear and specific about which of the 8 parish clusters your comment(s) relate to).**

No comment.

**Question 5.0d Are there other important issues and priorities you would like to highlight? (Please be clear and specific about which of the 8 parish clusters your comment(s) relate to).**

No comment.

**Question 5.1a Assuming some growth is desirable, have we identified the best site(s) at each town and village? (Please clearly specify which settlement(s) your comment(s) relate to, and use the site reference numbers shown on the map, where relevant). Would you like to promote an additional alternative site for consideration through the next SALA? Visit our Local Plan Review web page to find out how to submit a site.**

No comment.

**Question 6.1 Are there any other specific local studies that you believe are needed to inform the Local Plan review? Have you any advice on the scope or content of any of these studies?**